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

To the Director, Major Planning Assessments, Department of Planning

We the Owners Committees of **SP67711** (125 Euston Road Alexandria, comprising of **34 residential lots**) and **SP72036** (95 Euston Road Alexandria comprising of **59 residential lots**) strongly object to this project, the M4 East motorway upgrade and extension which forms part of the WestConnex scheme.

Global experience of major toll road construction has demonstrated conclusively that these projects are enormously expensive and counter-productive. WestConnex will increase air pollution and encourage more car use, quickly filling the increased road capacity. It is not a long-term solution to Sydney's congestion problem.

That the State Government has already signed multi-billion dollar contracts for WestConnex before this EIS was even placed on public exhibition undermines community confidence that this is a genuine consultation process. This EIS considers benefits for all stages of the project but doesn't address the negative impacts along the whole route.

We object to this proposal as it will have devastating impacts on local communities and fails to provide a long term solution to traffic and congestion. We outline the reasoning behind objection to the project below.

We appreciate that Sydney needs infrastructure but a toll road instead of public transport is wrong. Sydney deserves efficient public transport, NOT a toll road. Traffic modelling by independent consultants show the modelling by AECOM (which also prepared this EIS) is unsound. AECOM is a company with a questionable professional record[1] and has been awarded contracts in the

[1] Insolvency firm KordaMentha accuses AECOM of 'misleading and deceptive conduct' and making 'negligent misstatements' by ambitiously forecasting more than 100,000 vehicles a day while actual traffic volumes only totalled 22,000 a day. The insolvency firm also alleges Aecom had predicted

Westconnex project for both construction and assessing environmental risks - a clear conflict of interest. AECOM was the subject of legal action in Queensland, where more than 650 investors sued the company for allegedly inflating traffic predictions for a private toll-way in Brisbane.[2] Receivers and financiers of the $1.68 billion RiverCity Motor Group are believed to have reached an out-of-court settlement with AECOM, reliably estimated to be as much as $700 million.[3]

The EIS does nothing to address the major health and safety concerns and the social impact that the motorway will have on the local area.

There has been no sound business case established for the WestConnex and no traffic modelling that establishes the case for the project. This $15.4 billion WestConnex scheme – that's $2000 per adult and child in NSW – would be used by only a tiny proportion of the state's population each day, would fill up with induced traffic soon after it opened, would encourage more urban sprawl and would destroy numerous communities.

The report provides no data or concrete evidence to support assertions about the need for the project or the reason why alternatives were not preferred.

- The report states that a 'review of all available research was carried out'. In fact, this review omits discussion of important research and reports, which are highly relevant to this evaluation.

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future demand by referencing a 'one-hour demand forecast from a two-hour weekday peak-hour period' without 'allowance for seasonal adjustments' including school holidays."We believe the work done by Aecom to support their traffic forecasts was substandard. We have engaged third party experts to review their output," says KordaMentha partner Martin Madden.After RCM's Clem Jones Tunnel (Clem7) consistently failed to meet projected targets, the group financially collapsed in February 2011 with debts totalling $1.3 billion.

http://www.businessnewsaus.com.au/articles/traffic-forecasters-sued-for-clem7-numbers.html

[2] http://www.wsj.com/articles/aecom-technology-says-australia-toll-road-lawsuit-could-hurt-result-1407925288

[3] http://www.theaustralian.com.au/business/dataroom/rivercity-motor-group-in-168bn-legal-settlement/story-fnjw8txa-1227457810858

- The proposal should not be considered in isolation but as part of larger projects including other parts of the Westconnex.
- The actions undermine or render futile previous conditions of approval for the original M5.
- References to potential offsets and mitigation in the absence of any design or specific detail are meaningless.

Geoffrey Clifton, lecturer in Transport and Logistics Management at the University of Sydney's Institute of Transport and Logistics Studies has questioned the focus on new transport capacity to and from the CBD is misplaced – particularly road capacity, noting "Are we responding to demand, or are we just increasing the dominance of the CBD?"[4]

Clifton also notes that the WestConnex mega-project may not be the most economical solution to Sydney's transport challenges, pointing to the adoption of far less costly measures in other parts of Australia, saying, "There may be cheaper alternatives to some of the big ticket items on the government's investment list. We know from cities like Brisbane that investing in quality Bus Rapid Transit provides most of the benefits of rail based options at a fraction of the cost, and without many of the effects of disruption during construction."[5]

Christopher Standen, a research analyst also based at the University of Sydney's Institute of Transport and Logistics Studies, says, "We can never provide enough road capacity to cater for the huge latent demand for car travel in a highly populated and fast growing city. Investing in urban road expansion to 'fix congestion' is essentially a huge waste, and should not be funded through either asset recycling or borrowing. We know that urban freeways give a negative return on investment[6] – Sydney's Cross City

[4] https://sourceable.net/nsw-infrastructure-plans-draw-extremely-mixed-response/#

[5] https://sourceable.net/nsw-infrastructure-plans-draw-extremely-mixed-response/#

[6] Most of the privately owned toll highway projects constructed in the last 15 years in Australia have fallen into receivership or administration within a short time of opening to traffic when it became clear that toll revenue from actual

Tunnel and Lane Cove Tunnel[7] [8]are prime examples. WestConnex will be no different."[9]

Standen notes that the purported benefits of the project are based upon unsound economic reasoning. "The benefit to the economy and productivity will be a fraction of the AU$15 billion cost. Some $18 billion of the $20 billion in 'economic benefits' claimed is merely the value of expected 'travel time savings' and 'travel time reliability. Personal travel time savings do not benefit the economy, because any time saved is largely used for leisure, not economically productive activities."[10]

City economies are becoming less dependent on cars, with the rate of growth in kilometres travelled by car in capital cities in Australia, including Sydney, trending lower for the past two decades.[11] [12] Analysis by SGS Economic and Planning shows this is driven by two main factors. First: a structural shift in city economies away from manufacturing to services such as IT, finance and professional services; services which don't need to transport as many physical materials as they once did when they

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traffic usage would be well short of covering its contribution to the construction costs. http://www.tunneltalk.com/Discussion-Forum-16Jul13-Australia-PPP-toll-tunnel-crisis.php

[7] FUN FACT. Tony Shepherd, who recently stepped down as the Westconnex Delivery Authority Chair, was the executive of Transfield Holdings who ran the consortium who built the Lane Cove Tunnel. The Lane Cove Tunnel project was subject to legal proceedings between one of it's investors and the traffic forecasters Parsons Brinckerhoff and Booz Allen Hamilton due to the $144 million losses suffered by the investor from the inflated number for motorists forecast to use the tunnel. That tunnel opened in 2007 with actual traffic figures drastically below forecast. Lane Cove tunnel entered receivership in 2010. http://www.smh.com.au/nsw/audit-chief-tony-shepherd-pushed-traffic-forecasts-on-lane-cove-tunnel-20140812-103beq.html

[8] http://www.afr.com/news/politics/national/traffic-forecasters-settle-with-ampover-lane-cove-20140923-jftpp

[9] https://sourceable.net/nsw-infrastructure-plans-draw-extremely-mixed-response/#

[10] https://sourceable.net/nsw-infrastructure-plans-draw-extremely-mixed-response/#

[11] Wade, M. (2015) *The car is waning as an economic driver* in the Sun Herald , Sunday 11 October 2015 at page 31.

[12] NSW Government Household Travel survey http://www.bts.nsw.gov.au/ArticleDocuments/79/r2013-08-hts-summary.pdf.aspx

dominated the economy.[13] Patterns of jobs growth have also shifted with the knowledge industries grouping in and around CBDs, with workers following suit. These workers drive cars less.[14] The changing economic structure in Sydney results in jobs clustering together along public transport routes.[15]

Secondly: community preferences have changed with people preferring to live in locations where they can walk or ride to work and use public transport – the emergence of car sharing services such as GoGet is part of this trend.[16]This reflects behavioural changes in people not needing to drive as much as they might have in the past. Digital technologies and the sharing economy have disrupted driving behaviours and trends. These shifting trends in car use have huge implications for the way we use road infrastructure and also the way the decision-makers who allocate billions of tax payer dollars to major projects.

LACK OF CREDIBLE BUSINESS CASE

This project has no credible business case to point to as justification – strategy documents released following a parliamentary call for papers show the initial plan was to release plenty of detailed "econometric studies" to show the benefits of the WestConnex motorway. [17]

In December 2014, the NSW Auditor General criticised an earlier version of a purported business case for the Westconnex project, stating:

> *The processes applied to WestConnex to provide independent assurance to Government did not meet best practice standards. The agencies concerned adopted a*

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[13] Wade, M. (2015) *The car is waning as an economic driver* in the Sun_Herald , Sunday 11 October 2015 at page 31.
[14] Wade, M. (2015) *The car is waning as an economic driver* in the Sun Herald , Sunday 11 October 2015 at page 31.
[15] Wade, M. (2015) *The car is waning as an economic driver* in the Sun_Herald , Sunday 11 October 2015 at page 31.
[16] Wade, M. (2015) *The car is waning as an economic driver* in the Sun Herald , Sunday 11 October 2015 at page 31.
[17] http://www.smh.com.au/nsw/westconnex-has-a-numbers-issue-what-are-they-20140404-36400.html

number of good practice internal governance and assurance arrangements for WestConnex. However, the Government would have received greater assurance about the risks, costs and benefits of the project had these agencies devoted time and effort to also implementing the Major Projects Assurance Framework effectively.

Reliance was placed on steering committees and boards with responsibility for project delivery to also provide independent assurance to the Government. There is a fundamental conflict in such an arrangement. A steering committee or board with delivery responsibility cannot provide truly independent advice to government. If the Major Projects Assurance Framework had been fully implemented, there would have been regular, formal monitoring by and reporting to Infrastructure NSW in the period covered by this audit to enable it to provide independent assurance to the Government.

The confusion and lack of clarity noted above occurred despite the Major Projects Assurance Framework being developed and announced concurrently with the WestConnex concept. It is surprising that the agencies concerned held the view that the Major Projects Assurance Framework would not apply to such a major project as WestConnex. [18]

Subsequently, the NSW government promised to release sections of its business case but to date, has not done so.

This road project was envisaged by Infrastructure NSW, the Greiner-led advisory body that first recommended the motorway. The Sydney Motorways Project Office, set up at the end of 2012 under director Paul Goldsmith, received advice from construction firms Leighton and Ferrovial that a contentious element of the WestConnex plan, building the motorway in an open-cut "slot" down Parramatta Road, would be too difficult to build. It would also not achieve the "better urban environment" key to selling the

[18] page 3 NSW Auditor-General's Report to Parliament|WestConnex: Assurance to the Government https://www.audit.nsw.gov.au/ArticleDocuments/351/01_Westconnex_Full_Report.pdf.aspx?Embed=Y

project. Under Goldsmith, multiple "workstreams" were set up to write different parts of the business case for WestConnex. The business case was due in the middle of last year. Macquarie Capital would advise on the finances, Ernst & Young would advise on the economics, Leighton and Ferrovial would advise on the construction, and Sinclair Knight Merz and AECOM would advise on the traffic. And according to the documents in NSW Parliament under freedom of information laws, the traffic modelling would emerge as the most difficult part of the business case to wrestle with. [19] [20] [21]

One objective of the project is to "relieve road congestion so as to improve the speed, reliability and safety of travel in the M4 and M5 corridor, including parallel arterial roads." A report by SGS Economics & Planning commissioned by the City of Sydney found that the motorway is unlikely to reduce traffic on local roads, exposes the public to huge financial risk, and will not benefit a large proportion of Sydney commuters, including those in Western Sydney. [22] [23] Independent experts argue that motorways induce rather than remove traffic. [24] [25]

One does not even have to look as far as independent experts to find evidence that the statement that road congestion will be

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[19] http://www.smh.com.au/nsw/westconnex-has-a-numbers-issue-what-are-they-20140404-36400.html

[20] http://www.smh.com.au/nsw/westconnex-people-left-wondering-as-plans-shift-and-change-20140704-zswsi.html

[21] Query on Westconnex numbers http://www.afr.com/news/politics/query-on-westconnex-numbers-20140127-iy6oglo

[22] Saulwick, J. (2015) Westconnex: The wrong project for Sydney report says' Feb 23. http://www.smh.com.au/nsw/nsw-state-election-2015/westconnex-the-wrong-project-for-sydney-report-says--invest-in-public-transport-instead-20150223-13m8f0.html

[23] SGS Economics & Planning (2015) Summary report http://www.cityofsydney.nsw.gov.au/__data/assets/pdf*file/0011/232697/150427*COUNCIL*ITEM35*ATTACHMENTA.PDF

[24] Zeibots, M.E. Institute for Sustainable Futures, UTS 2007, Before and after the motorway: A review of methodologies used to investigate the occurrence of induced traffic growth in international and Australian cities, pp. 1-65, Sydney.

[25] Zeibots, M.E. 2009, 'Do people really love their cars or do governments just love road building ... and what are the implications for sustainability?', Society for Sustainability and Environmental Engineering Program, International Conference: Solutions for a Sustainable Planet, Society for Sustainability and Environmental Engineering, Melbourne, Australia, pp. 1-11

relieved on arterial roads is not correct. The EIS for the M4 widening from Parramatta to Homebush found that traffic is expected to increase on Parramatta Road by 35% after tolls are imposed. By 2031, it will be 16% more. These increases will be mostly due to diversion from the M4, which will be tolled again.
Traffic will also increase on Victoria Road and the M2 motorway. The EIS for Westconnex preliminary works at King Georges Road interchange shows that the intersection would be even more congested when the preliminary project is completed.

The report states that the M5 duplicate is part of a much bigger project involving more than 33 kilometres of exposed motorway and tunnel. It acknowledges that the M5 duplicate tunnel alone will involve the removal of more than 80 hectares of vegetation, bushland and sporting fields. The impact for the whole proposed Westconnex project has not been assessed.

The proposed motorway does not provide any amenity to local communities in any aspect of the proposal.

THE EIS

The general requirements on an Environmental Impact Statement (EIS) must be prepared in accordance with, and meet minimum requirements. An analysis of a project must be in accordance with clause 7(1)(d) of Schedule 2 Of the *Environmental Planning and Assessment Regulation (2000) NSW.*

This clause provides that the content of environmental impact statement is as follows:

(1) An environmental impact statement must also include each of the following:

(a) a summary of the environmental impact statement,

(b) a statement of the objectives of the development, activity or infrastructure,

(c) an analysis of any feasible alternatives to the carrying out of the development, activity or infrastructure, having regard to its objectives, including the consequences of not carrying out the development, activity or infrastructure,

(d) an analysis of the development, activity or infrastructure, including:
(i) a full description of the development, activity or infrastructure, and
(ii) a general description of the environment likely to be affected by the development, activity or infrastructure, together with a detailed description of those aspects of the environment that are likely to be significantly affected, and
(iii) the likely impact on the environment of the development, activity or infrastructure, and
(iv) a full description of the measures proposed to mitigate any adverse effects of the development, activity or infrastructure on the environment, and
(v) a list of any approvals that must be obtained under any other Act or law before the development, activity or infrastructure may lawfully be carried out,
(e) a compilation (in a single section of the environmental impact statement) of the measures referred to in item (d) (iv),
(f) the reasons justifying the carrying out of the development, activity or infrastructure in the manner proposed, having regard to biophysical, economic and social considerations, including the principles of ecologically sustainable development set out in subclause (4).[26]

M4 East SSI 6307 (the subject of this objection) page1-1

The project is located within the Auburn, Strathfield, Canada Bay, Burwood and Ashfield local government areas (LGAs). The project travels through 10 suburbs: Sydney Olympic Park, Homebush West, Homebush, North Strathfield, Strathfield, Concord, Burwood, Croydon, Ashfield and Haberfield.

The M4 East SSI 6307 EIS Statement of Objectives at 3.3 and our Objections to the Objectives[27]:

26
Amended SEARs 16 June 2015.pdf

27 M4 East Environmental Impact Statement Volume 1 A page 3-16 https://majorprojects.affinitylive.com/public/4b70b2e3a1143795114f6b619c02af12/EIS_Volume%201A.pdf

States that the core objectives of this project are consistent with the core objectives of the entire WestConnex project:

1. Support Sydney's long-term economic growth through improved motorway access and **connections linking Sydney's international gateways (Sydney Airport and Port Botany),** Western Sydney and places of business across the city

Objection. Sydney traffic congestions costs the economy billions of dollars each year. The question is: How far will Westconnex go to solving that traffic congestion? One analysis has already raised serious questions about traffic modelling.[28] Another says that that there will be more congestion along the Parramatta Rd corridor.[29] If the Westconnex leads to more traffic congestion in the Inner West and routes into the CBD, it will not improve access to businesses. It may depend which businesses one considers but thousands of small businesses in Haberfield, Newtown and St Peters have not been consulted and fear that their livelihoods will be damaged not enhanced.

This core objective neglects to mention the Badgery's Creek airport which would be another international gate way, improving

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[28] THE collapse of the original Cross City Tunnel business was a complicated financial mess for banks and investors but it had one simple root cause: they got the traffic forecasts wrong.

http://www.smh.com.au/federal-politics/political-opinion/the-forecast-was-not-good–or-even-accurate-20120929-26rzb.html

[29] Twenty years ago the Greiner and Fahey Governments claimed construction of the M4 missing link and the M5 would significantly cut travel times and reduce congestion. Opponents said the motorways would only generate more traffic, eroding any short term improvements while pulling people off public transport and starving the rail and other pubic transport networks of funds for further development.

Today, Sydney's road traffic is worse than ever and in some inner urban areas where the motorways converge, motorists are beginning to experience **'super-jams'** — delays where people can get caught in traffic for hours.

http://m4eis.org/2015/10/15/eis-admits-deterioration-in-parramatta-road-traffic-after-m4-east/

connections for Western Sydney, especially if there is a railway to the airport.

2. **Relieve road congestion so as to improve the speed, reliability and safety of travel in the M4 corridor, including parallel arterial roads.** Cater for the diverse travel demands along these corridors that are best met by road infrastructure

Objection. The second sentence seems to assume rather than demonstrate that this objective will be met by stating that diverse travel needs are 'best met by road infrastructure.' Claims by Westconnex that the project will improve speed and reliability depend on the reliability of its approach to traffic modelling which experts argue are flawed.[30]

3. Create opportunities for urban revitalisation, improved liveability, and public and active transport improvements along and around Parramatta Road

Objection. This is a reference to Urban Growth's plans for major redevelopment [31] *including high rise buildings along Parramatta Rd. There is no doubt that some opportunities for cycling and walking will be retained or developed but many argue that the overall impact of the project will be to increase car dependency which will have negative health impacts. The project could improve livability for some but serious downgrade livability for many thousands of others.*

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[30] Christopher Standen, a research analyst also based at the University of Sydney's Institute of Transport and Logistics Studies, says "We can never provide enough road capacity to cater for the huge latent demand for car travel in a highly populated and fast growing city. Investing in urban road expansion to 'fix congestion' is essentially a huge waste, and should not be funded through either asset recycling or borrowing. We know that urban freeways give a negative return on investment– Sydney's Cross City Tunnel and Lane Cove Tunnel are prime examples. WestConnex will be no different."

[31] http://www.urbangrowthnsw.com.au/work/urban-transformation-projects/parramatta-road-urban-transformation-program.aspx

4. Enhance the productivity of commercial and freight generating land uses strategically located near transport infrastructure

Objection. This is a reference to the faster travel times for businesses along the Westconnex route. This relies on traffic modelling predictions being accurate. Modelling has failed for some past projects leading to business failure. It's also not clear exactly what this is referring to and in the absence of a transparent business case, it's not possible to evaluate the positive impact of land uses.

5. Enhance movements across the Parramatta Road corridor which are currently restricted

Objection. It's hard to see how this objective will be achieved when there will be more traffic on some sections of Parramatta Rd than there is now. Some intersections across Parramatta Rd west of Homebush will also be slower according to the M4 Widening M4 East SSI 6307 EIS*. Traffic flow might flow more easily in the M4 tunnel but some argue that it will hit congested spots not long after it emerges from the tunnel. Past experience would suggest that this congestion could bank up in tunnels. Also by 2031, the tunnels will reach full capacity.*

6. **Fit within the financial capacity of the State and Federal Governments, in partnership with the private sector**

Objection. It is not possible to assess this goal because there is no public business case. Billions of dollars of public money are being paid to private companies. The public not the private sector carry the risk on this project. Currently, banks are being recruited to offer loans that will be repaid over many years by the toll paying public. That the Westconnex Delivery Authority functions have been transferred to a private (but publicly owned) corporation, the Sydney Motorway Corporation [32] only adds to the lack of transparency around the project. As asserted above, the only business case that was ever produced was found by the NSW

[32] http://www.smh.com.au/nsw/westconnex-shielded-from-scrutiny-after-control-handed-to-private-corporation-20151016-gkapzx.html

Auditor General to be inadequate.[33] *The Auditor General found "the process to provide independent assurance to government did not meet best practice standards" by the "steering committees and boards with responsibility for project delivery…is a fundamental conflict [and] cannot provide truly independent advice".*[34] *Currently we the public do know that the Westconnex will absorb billions of Federal and State funds that could be spent on alternative projects.*

7. **Optimise user pays contributions to support funding in a way that is affordable and equitable**

Objection. This is a reference to tolls for the road users. Commuters who choose to use the Westconnex M4 to travel would spend hundreds of dollars a week on tolls.[35] *While some agree with a user pays approach to roads, others argue that tolls shouldn't be applied unless there is affordable public transport alternatives or alternative free viable routes.*

8. **Integrate with the preceding and proposed future stages of WestConnex, without creating significant impacts on the surrounding environment or duplicating any potential issues across the construction periods**

Objection. This is very hard to accept given the three (3) year long construction period for the M4 tunnel and the 24/7 construction plan. Even the M4 East SSI 6307 EIS acknowledges there are significant impacts in relation to noise,[36] *loss of housing*[37] *and*

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[33] page 3 NSW Auditor-General's Report to Parliament|WestConnex: Assurance to the Government

[34] page 3 NSW Auditor-General's Report to Parliament|WestConnex: Assurance to the Government

[35] http://www.mehreenfaruqi.org.au/westconnextolls/

[36] page viii https://majorprojects.affinitylive.com/public/4b70b2e3a1143795114f6b619c02af12/EIS_Volume%201A.pdf

[37] pages 4-30 , 4-31 , 4-32 , 5-1, https://majorprojects.affinitylive.com/public/4b70b2e3a1143795114f6b619c02af12/EIS_Volume%201A.pdf

destruction of heritage.[38] *Already on the M4 widening, there are issues with asbestos waste while at Beverly Hills noise walls have been stripped away from the M5 and will stay down for about 4 more months than originally predicted.*

9. **Protect natural and cultural resources and enhance the environment through the following key approaches:**

-Manage tunnel ventilation emissions to ensure local air quality meets EPA standards

-Maintain regional air quality

-Minimise adverse impacts at a local level on air and noise quality

-Manage in-tunnel air quality to meet community visibility and health expectations

-Minimise energy use during construction and operation

-Manage noise impacts in accordance with the NSW Road Noise Policy and realise opportunities to reduce or mitigate noise

-Provide for improvement of social and visual amenity

-Minimise impacts on natural systems including biodiversity

-Minimise impact on Aboriginal and non-Aboriginal cultural heritage

-Minimal impact on surface and groundwater sources and water quality including management of contaminated areas

Objection. Hectares of open space and a huge amount of trees and other vegetation would be lost and are marked to be lost

[38] page 4-23 https://majorprojects.affinitylive.com/public/4b70b2e3a1143795114f6b619c02af12/EIS_Volume%201A.pdf

across the Westconnex project routes. A large number of heritage buildings, including homes, would be demolished.

The M4 East SSI 6307 EIS description of strategic need at 3.2 and our rebuttal:

With respect to existing road network conditions, the M4 East SSI 6307 EIS identifies:
"Parramatta Road between Burwood and the Sydney CBD is identified in the NSW Long Term Transport Master Plan as the most important Sydney transport corridor, due largely to it having the highest public transport movements of any corridor in Sydney" and "there is high travel demand and the road is considered highly constrained in its ability to meet this demand with average travel speeds of private vehicles during the morning peak of about 30 kilometres an hour".

The M4 East SSI 6307 EIS devotes a short paragraph to the impact of congestion on public transport, that is "buses do not run to timetable" and specifically notes: "During Urban Growth's consultation on Draft Parramatta Road Urban Renewal Strategy (UrbanGrowth NSW 2015), **improved *public transport services* were identified by survey participants** as the highest priority issue for the Parramatta Road corridor."[39]

At 3.2.6 The M4 East SSI 6307 EIS states **that a fully completed WestConnex** and urban growth **would facilitate a new rapid transit transport solution** (ie bus rapid transit or light rail transit).

We argue that "facilitating public transport solutions" for an area identified by Urban Growth NSW and NSW Long Term Transport Master Plan is not an ideal outcome, particularly when the NSW Long Term Transport Master Plan states *INFRASTRUCTURE* is required:

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[39] [at 3.2.2]
https://majorprojects.affinitylive.com/public/4b70b2e3a1143795114f6b619c02af12/EIS_Volume%201A.pdf

Bus Head Start Program: ***Bus priority infrastructure*** *on major road corridors on Sydney's strategic bus network to improve public transport travel times to urban centres or interchanges* [40]

Outcomes and objectives of the project are noted at 3.1 of the M4 East SSI 6307 EIS and our rebuttal.[41]

The M4 East SSI 6307 EIS outlines that the project (as part of WestConnex) is to help to achieve several priority actions by expanding the capacity of the M4 and extending it further east along the Parramatta Road corridor, within the context of goals identified in the NSW 2021 Performance Report (NSW Department of Premier and Cabinet 2014)[42] and NSW 2021: A Plan to Make NSW Number One (NSW Department of Premier and Cabinet 2011)[43] which the M4 East SSI 6307 EIS refers to as "NSW 2021".

Specifically it is claimed the project will help achieve goals:

- 4 – increase competitiveness of doing business in Sydney by reducing travel times along the M4 and Parramatta Road corridor[44] [45]
- 7 – reduce travel times along the M4 and Parramatta Road corridor [46] Bureau of Transport NSW household travel survey

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40 http://www.transport.nsw.gov.au/sites/default/files/b2b/publications/lttmp-fact-sheet-sydney.pdf

41 M4 East Environmental Impact statement Volume 1 A at page 3-1 https://majorprojects.affinitylive.com/public/4b70b2e3a1143795114f6b619c02af12/EIS_Volume%201A.pdf

42 http://www.nsw.gov.au/sites/default/files/initiatives/nsw_2021_performance_report.pdf

43 http://www.ipc.nsw.gov.au/sites/default/files/file_manager/NSW2021_WEBVERSION.pdf

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statistics[47] released in 2013 show that *The total daily travel time per person has remained unchanged at 79 minutes for a decade.* [48] [49]

- 8 – grow public transport patronage as the project (as part of WestConnex in its entirety) is considered to be a key driver for the introduction of a rapid transport solution (ie buses or light rail).[50] *A key driver is not a solution.*

- 10 – improve road safety by reducing the congestion "because lower vehicle numbers result in fewer potential conflicts between vehicles"[51] [52]

- 19 – invest in critical infrastructure - **The project was declared to be critical State significant infrastructure in December 2014**[53]

- 20 – build liveable centres - The planned reduction in trucks and cars travelling longer distances on Parramatta Road is supposed to facilitate urban renewal along the corridor through improved urban amenity and liveability characteristics, supported by improved public transport, active transport such as walking and cycling, and local vehicle travel. And enhance the connections between key housing and employment areas (as described in section 3.1.5 - A Plan for Growing Sydney).[54]

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[47] http://www.bts.nsw.gov.au/ArticleDocuments/79/r2013-08-hts-summary.pdf.aspx
[48] Page 9 http://www.bts.nsw.gov.au/ArticleDocuments/79/r2013-08-hts-summary.pdf.aspx
[49] Page 23 Sydneysiders spent an average of 79 minutes travelling each weekday. This has remained unchanged for the last decade.

http://www.bts.nsw.gov.au/ArticleDocuments/79/r2013-08-hts-summary.pdf.aspx
[50] page 3-2 Volume 1A
[51] page 3-2 Volume 1A
[52] Then refers the reader to 3.2.2 and 8.2.2 of the EIS.
[53] Page 3-2 Volume 1A
[54] page 3-2 volume 1A

With respect to Goal 20, A Plan For Growing Sydney - Housing Choices, direction 2.2 provides for acceleration of urban renewal across Sydney, providing homes closer to jobs.

New urban renewal locations are to be selected in or near centres on the public transport network. The policy framework suggests that by locating new housing in these areas, it will be easier for people to get to jobs and services and take pressure off congested roads.

New housing will be supported by social infrastructure – for example, parks and sporting facilities, schools, and medical services – to make the living environment more attractive.[55]

A Plan for Growing Sydney focuses new housing in centres, which have public transport that runs frequently and can carry large numbers of passengers. The Government is supposed to continue to focus urban renewal activities to provide additional housing in the Parramatta Road corridor.

Improved transport services for this corridor was identified in Sydney's Bus Future. Targeting housing in the Parramatta Road corridor is to "make public transport a more viable alternative to car transport".[56]

Transport is said to the significant enabler to link people to jobs and a catalyst for further urban renewal in the *Plan for Growing Sydney*: "Improvements to public transport will create an opportunity to explore the changing patterns of activity across Sydney. For example, as Greater Parramatta grows, it will be important to consider opportunities that may be created for the Liverpool to Parramatta Corridor".[57]

At 3.1.5 of the M4 East SSI 6307 EIS, it states that the Westconnex project supports the four goals defined in *A Plan for Growing Sydney*:

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[55] A Plan for Growing Sydney Direction 2.2
http://www.strategy.planning.nsw.gov.au/sydney/the-plan/
[56] http://www.strategy.planning.nsw.gov.au/sydney/the-plan/
[57] http://www.strategy.planning.nsw.gov.au/sydney/the-plan/

Goal 1 – A competitive economy with world-class services and transport

Goal 2 – A city of housing choice with homes that meet our needs and lifestyles

Goal 3 – A great place to live with communities that are strong, healthy and well connected

Goal 4 - A sustainable and resilient city that protects the natural environment and has a balanced approach to the use of land and resources.[58]

A Plan for Growing Sydney also sets out specific directions and actions that will deliver these goals.

Goal 1 – A competitive economy with world-class services and transport
"Direction 1.11 of A Plan for Growing Sydney identifies the WestConnex corridors as corridors that should be preserved to allow Sydney's transport networks to expand as Sydney grows."[59]
Action 1.11 states:

"Preserve future transport and road corridors to support future growth. Preserving future transport corridors allows Sydney's transport networks to grow as the city's population grows. They become a focus for future housing and jobs and link residents to other services and recreation."[60]

The policies that WestConnex claim as its driving mandate to build 33 kilometres of toll roads are in fact focusing on public transport.

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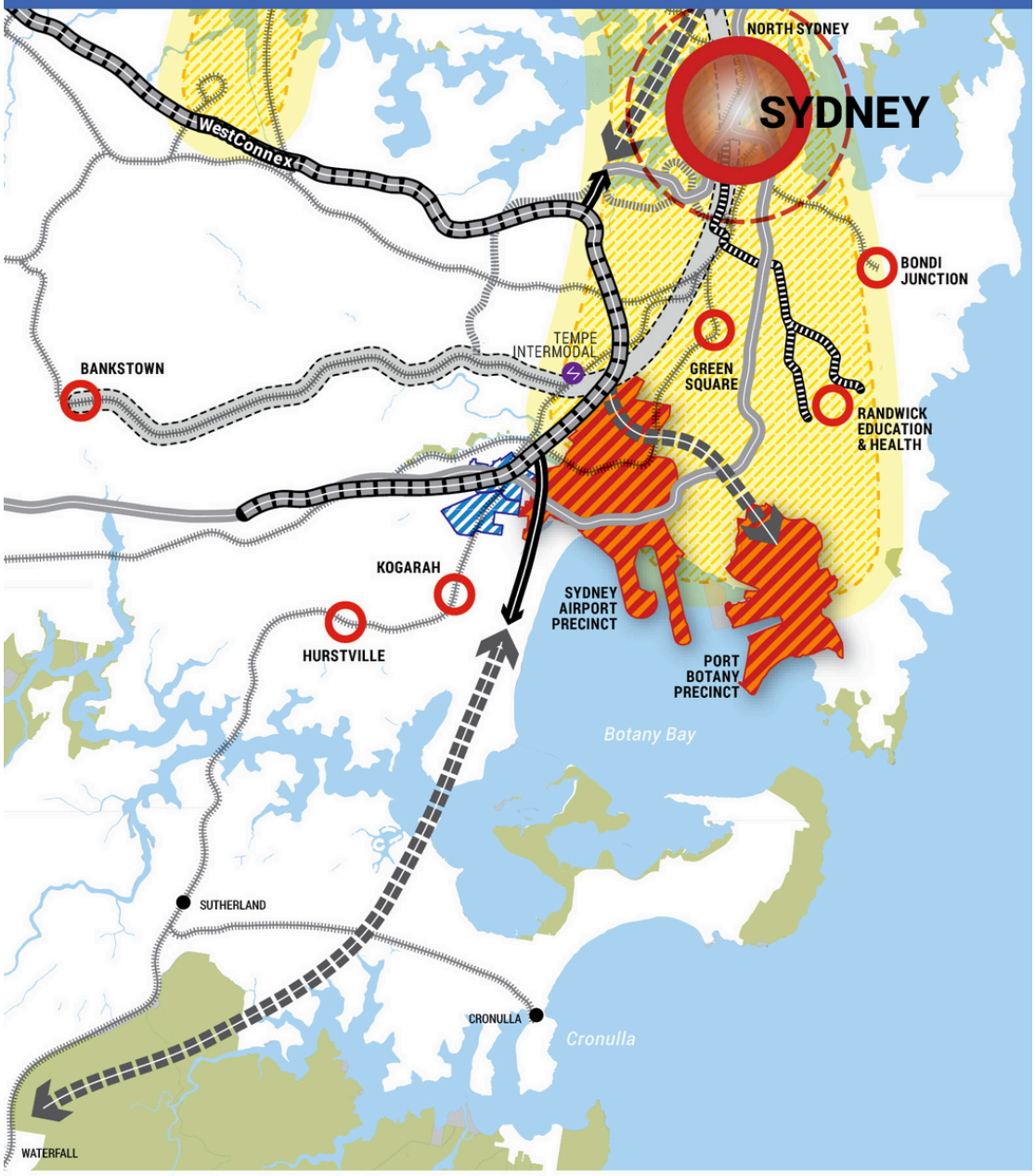
[58] page 3-6 Volume 1A
https://majorprojects.affinitylive.com/public/4b70b2e3a1143795114f6b619c02af12/EIS_Volume%201A.pdf
[59] page 3-6 Volume 1A
https://majorprojects.affinitylive.com/public/4b70b2e3a1143795114f6b619c02af12/EIS_Volume%201A.pdf
[60] Action 1.11.1 http://www.strategy.planning.nsw.gov.au/sydney/the-plan/

The diagram of Westconnex provided *in A Plan for Growing Sydney*, figure 20 extracted below, is very different to the ones being presented to communities today.[61] [62]

[61] http://www.strategy.planning.nsw.gov.au/sydney/wp-content/uploads/sites/2/2014/11/Fig-20-Southern-Sydney-WEB.jpg

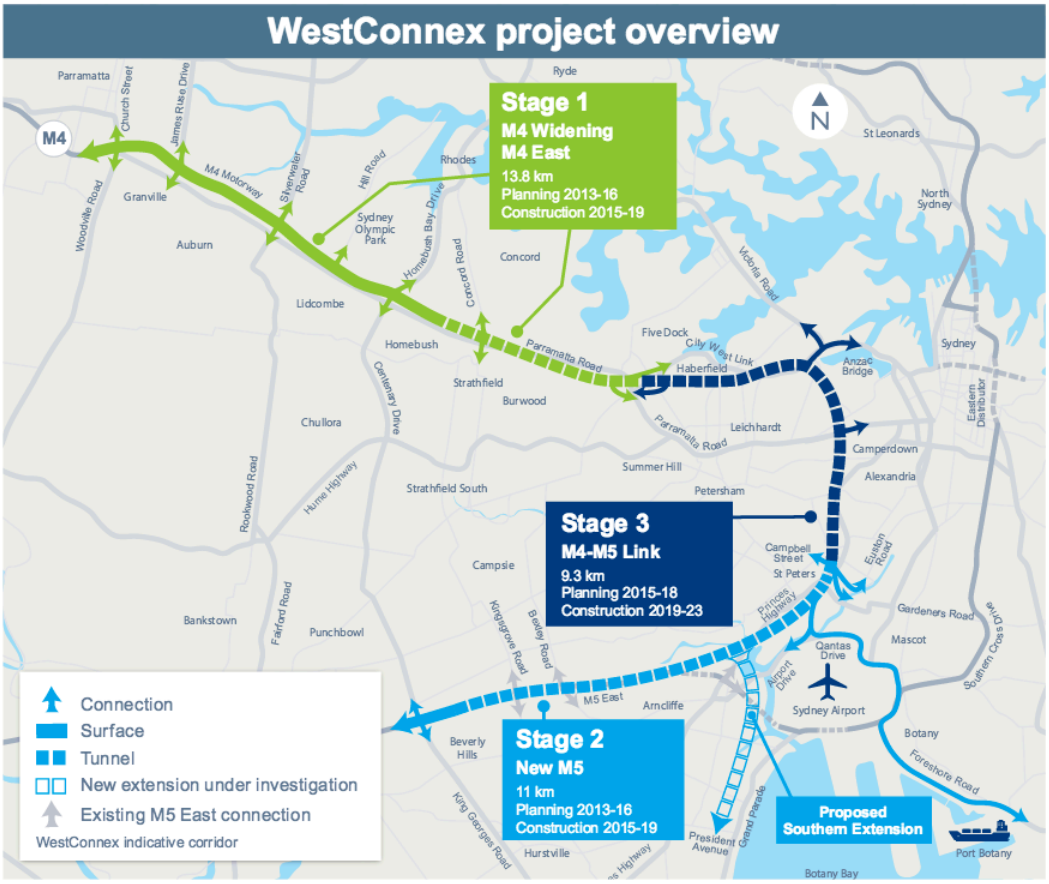
[62] A Plan for Growing Sydney 2014 The Department of Planning and Environment http://www.strategy.planning.nsw.gov.au/sydney/the-plan/

FIGURE 20: Southern Sydney – Integrating employment with transport investment



Indeed the image overviews of Westconnex in its entirety presented in the M4 East SSI 6307 EIS application differs to the one presented in September 2015's community update documentation.

Below image via M4 East September 2015 EIS Community Update[63]



63 http://www.westconnex.com.au/documents/150909m4_east_community_update.pdf

Below image via M4 East Application Report overview of Westconnex scheme– figure 1.1[64]

Figure 1-1 **Overview of WestConnex scheme**

[64] Page 3 https://majorprojects.affinitylive.com/public/657170f6b7df3b19bda88a222fd0ec4b/WestConnex_M4%20East_SSI%20Application%20Report.pdf

Traffic and Transport

Westconnex representatives said at the Enmore Theatre community meeting 23 February 2015 that "the percentage of trips taken by car will not change".[65] However, NSW Bureau of Transport Statistics show that in the decade to 2012, the population grew by 12%, car driver trips grew only 6%, while trips by bus and train increased by 16% and 23% respectively.[66] At the same community meeting, it was said that if the M4-M5 Link is not built, the same amount of traffic "will still find a way through your area". This flies in the face of research overseas and in Australia, which consistently finds that adding extra roads encourages more traffic, while closing roads results in less traffic.[67] The 2007 OECD European Conference of Ministers of Transport report put forward policy-oriented, research-based recommendations for effectively managing traffic congestion and eliminating excessive congestion in large urban areas. Of which Australia was a party to this conference.[68]

It was found that care should be given to consider the downstream impacts of releasing greater traffic flows through previously contained bottlenecks. Great care should be taken to at least address what the network effects will be over the mid- to long-term of such bottleneck treatments.[69] They go on to say that building new road infrastructure is often constrained by a lack of space in dense urban cores *and is nearly always an expensive proposition even in the outlying peripheries of urban areas*. Many cities now view infrastructure expansion only as a last resort. The effectiveness of providing new road capacity as a congestion

[65] LINK TO 1.39 video of meeting
https://publish.viostream.com/play/179qaabn7j1nq
[66] http://www.bts.nsw.gov.au/Statistics/Travel-Forecasts/Travel-Forecasts/default.aspx?FolderID=221#top
[67] http://www.internationaltransportforum.org/Pub/pdf/07Congestion.pdf
[68] http://www.internationaltransportforum.org/Pub/pdf/07Congestion.pdf
[69] page 23
http://www.internationaltransportforum.org/Pub/pdf/07Congestion.pdf

management “solution” is oftentimes eroded by new traffic demand.[70]

Using the traffic data in the Westconnex M4 East SSI 6307 EIS, the Ecotransit Sydney team have analysed the impact of the project on local roads and concluded: “traffic volumes on local roads are higher with the M4 East motorway and full Westconnex motorway scheme in place than they would be without them.”[71] This will disappoint those who are hoping that the Westconnex would relieve them of wasted hours sitting in traffic jams.

Ecotransit Sydney concluded, “An EIS is supposed to honestly and fully discuss the costs and economic benefits as well as the social and environmental effects of a project as well as alternatives to it, but the EIS for the M4 East section of the EIS is no more than a shoddy and evasive sales pitch.”[72]

Local roads are at capacity, especially during morning and afternoon peak periods and on weekends. There will also be an adverse impact on local streets as drivers detour to avoid the tolls. Most suburban streets do not have vehicle weight limits so the impact of heavy vehicles will be felt by residents. Roads and Maritime Services modeling prepared early in 2015, shows traffic volumes for roads around inner Sydney and the third stage of WestConnex – a tunnel from St Peters to Haberfield - before and after this tunnel is built. Along King Street, the RMS figures show a continual increase in cars travelling in the morning and afternoon peak hours between the years 2011, 2026 and 2036. There is a similar story for other major roads around the inner south of Sydney, including the already densely congested Botany Road, O'Riordan Street, Cleveland Street and Southern Cross Drive. The modelling challenges claims that construction of the motorway will

[70] page 23
http://www.internationaltransportforum.org/Pub/pdf/07Congestion.pdf
[71] http://m4eis.org/2015/10/14/pubic-transport-group-ecotransit-says-westconnex-is-15-billion-down-hole/
[72] http://m4eis.org/2015/10/14/pubic-transport-group-ecotransit-says-westconnex-is-15-billion-down-hole/

quieten local roads.[73] Figures obtained by Fairfax Media were created within RMS using the department's strategic traffic forecasting model. The documents include information about when the model created the traffic forecasts. The forecasts do not align with the traffic forecasts released by the WDA for the first stage of the project, the widened M4 motorway. The WDA is using traffic forecasts for *2021* and *2031*, as opposed to the figures for 2026 and 2036 obtained by Fairfax Media.[74]

Chapter 8 of the M4 East SSI 6307 EIS outlines the potential traffic and transport impact associated with the M4 East project, with a detailed traffic and transport assessment for the project in appendix G of the M4 East SSI 6307 EIS documents. [7576]

The M4 East SSI 6307 EIS analysis of travel times savings results in time savings in the morning peak period of 6 to 8 minutes provided by the project by 2021, with savings of 10 to 18 minutes by **2031** – because of a linking of the M4 and M5.[77] The afternoon peak period is similar in time savings by 2021(6 to 8 minutes), with 13 to 20 minutes by 2031, again the M4-M5 link needs to happen to achieve this meager travel time saving.[78] Appendix G defines the morning or AM peak period as "trips arriving at their destination during the average one hour peak period between 6.31am–9.30am

[73] http://www.smh.com.au/nsw/sydney-traffic-secret-westconnex-documents-show-worse-congestion-after-toll-road-20150525-gh980u.html#ixzz3pNz1y4s4
[74] http://www.smh.com.au/nsw/sydney-traffic-secret-westconnex-documents-show-worse-congestion-after-toll-road-20150525-gh980u.html#ixzz3pNzjnEVW

[75] page 8-1 https://majorprojects.affinitylive.com/public/4b70b2e3a1143795114f6b619c02af12/EIS_Volume%201A.pdf
[76] Appendix G p113 - https://majorprojects.affinitylive.com/public/656c6d9869cff4e877fa7f539904a093/EIS_Volume%202A_%20App%20A-G.pdf
[77] page 8-30 Figure 8.4 https://majorprojects.affinitylive.com/public/4b70b2e3a1143795114f6b619c02af12/EIS_Volume%201A.pdf
[78] 8-30 Figure 8.5 https://majorprojects.affinitylive.com/public/4b70b2e3a1143795114f6b619c02af12/EIS_Volume%201A.pdf

on a weekday"[79] and afternoon or PM peak period as "vehicle trips arriving at their destination during the average one hour peak period between 3.01pm–6.30pm on a weekday".[80]

The automatic traffic count (ATC) surveys were completed by AECOM Australia between 2012 and 2014 to understand and analyse existing traffic volumes and patterns, and signed off in the executive summary in September 2015.[81]

With respect to future conditions without the road infrastructure project, AECOM's predictions suggest "unsatisfactory levels of service" in both 2021 and 2031 future year scenarios.[82]

AECOM was the subject of legal action in Queensland – more than 650 investors sued for $150 million, claiming the company's traffic predictions for a privately owned toll-road in Brisbane were substantially inflated.[83] BrisConnections, the owner and operator of Brisbane's Airport Link tunnels went into receivership in February 2013 because the company did not generate enough income from toll fares to pay back its debt.[84]

The evaluation of alternatives is vague, lacks details and is superficial. There is no data to support any claims.

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[79] Glossary Appendix G page i
https://majorprojects.affinitylive.com/public/656c6d9869cff4e877fa7f539904a093/EIS_Volume%202A_%20App%20A-G.pdf
[80] Glossary Appendix G page iii
https://majorprojects.affinitylive.com/public/656c6d9869cff4e877fa7f539904a093/EIS_Volume%202A_%20App%20A-G.pdf
[81] Appendix G page v
https://majorprojects.affinitylive.com/public/656c6d9869cff4e877fa7f539904a093/EIS_Volume%202A_%20App%20A-G.pdf
[82] Appendix G page vii
https://majorprojects.affinitylive.com/public/656c6d9869cff4e877fa7f539904a093/EIS_Volume%202A_%20App%20A-G.pdf
[83] https://newmatilda.com/2015/06/04/westconnex-mike-bairds-tunnel-big-corporate-love/
[84] http://www.smh.com.au/business/aviation/compensation-demanded-for-brisbane-airport-link-tunnel-defects-20150622-ghulfb.html#ixzz3nlkqubZs

TUNNEL DESIGN

Over height trucks using Sydney's current tunnel network cause chaos when drivers ignore load height restrictions or confirm their load are properly secured, causing lengthy delays for hundreds of thousands of motorists. There is a 13 kilometre tunnel proposed as part of the project. Sydney's major tunnels are 4.4 metres in height except the M5 East Main Tunnel which is 4.6 metres.[85]

Each mainline tunnel of the Westconnex project would generally be excavated to a height of between eight and 10 metres and a width of between 14 and 20 metres. After tunnel lining and fitout, each tunnel would have a minimum vertical clear envelope of 5.3metres and a width of at least 12.5 metres. [86]

Most major road tunnels do not allow passage to trucks carrying dangerous goods, meaning that the dangerous materials will continue rumbling along suburban roads. Exactly how the residents are supposed to feel comforted about this fact remains unanswered.

FREIGHT

The M4 East SSI 6307 project objectives state there is a need to enhance the productivity of commercial and freight generating land uses strategically located near transport infrastructure. This is to improve connectivity and journey times across the corridor, and "provide the opportunities for regeneration being explored in the Parramatta Road Urban Transformation Program and improve the capacity of the transport network for the increased productivity of land uses".[87]

One of the biggest arguments being used for this project is freight however a new freight terminal being built in Western Sydney is

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[85] https://www.crosscity.com.au/files/Documents/2006_tunnelsafety.pdf

[86] 5.4 EIS Tunnels at page 5-7
https://majorprojects.affinitylive.com/public/4b70b2e3a1143795114f6b619c02af12/EIS_Volume%201A.pdf

[87] page 8-33
https://majorprojects.affinitylive.com/public/4b70b2e3a1143795114f6b619c02af12/EIS_Volume%201A.pdf

part of a strategy to move freight from Port Botany by rail instead of more trucks on overcrowded roads:[88]

> *Qube Logistics and rail group Aurizon plan to develop a $1.9 billion intermodal facility that would remove up to 3000 trucks a day from Sydney roads by railing containers to the Moorebank site in Sydney's southwest, from where they would then be transferred to trucks for local distribution.*
>
> *The project has won backing from the federal government, which would need to spend an estimated $350m on rail to the facility. The project would see the two companies emerge as significant players in Sydney's freight business.*
>
> *But Asciano, which owns the country's biggest stevedoring business, Patrick, and the Pacific National rail network, wants to develop its own sites, allowing the company to win a bigger share of the handling costs.*
>
> *Chief executive John Mullen said the Asciano sites at Chullora and St Marys were better located near the existing freight precincts where customers already have warehouses and distribution centres.*
>
> *"The reality is that customers drive this, not us," Mr Mullen said. Mr Mullen said the integrated ports and rail business would begin sending freight to an existing intermodal terminal at Chullora — used now for interstate freight — while work begins next year on upgrading the St Mary's site, which lacks most facilities except a rail siding.*
>
> *The site has the potential to handle up to 300,000 twenty-foot-equivalent units (TEU) or shipping containers a year, which represent about a quarter of the throughput at the Patrick stevedoring operation, the largest at Port Botany. Mr Mullen said* ***the long-discussed plans to shift freight from roads*** *to rail had become more viable because of increasing congestion on Sydney roads, which increased the time and cost of moving freight through the city.*

[88] http://www.theaustralian.com.au/news/asciano-to-shift-container-traffic-from-road-to-rail/story-e6frg6n6-1227562553590 October 9 2015

> *"Congestion, longer and longer transport times are slowly making **rail a lot more competitive solution, quite apart from the environmental impact**." he said.*
>
> *"The time is right for slow, steady growth. I think you are going to see quite a lot of this as a trend going into the future."*
>
> *The Asciano plan is the latest in a series of planned intermodal facilities, with Toll and Japan Post planning a site at Villawood.* [89]

SGS Economics and Planning prepared reports for the City of Sydney council earlier in 2015. They concluded that the construction the Moorebank Intermodal Freight Terminal (and smaller intermodal terminals around Sydney) may mean that the M5 extensions between Sydney Airport / Port Botany and Western Sydney are not required. [90] SGS Economics and Planning note the 'Business Case' for WestConnex was completed prior to the announcement of the second Sydney airport at Badgerys Creek, and state that Sydney's second airport will not only change the distribution of passenger and freight movements around Sydney; it will majorly influence local employment growth in related industries.[91]

Traffic modeling and Public Transport

According to the documents released to the NSW Parliament, the traffic modelling is the most contentious part of the Westconnex project. Professor David Hensher from the Institute of Transport and Logistics Studies at Sydney University, was assigned a role as an academic peer reviewer of the traffic modelling. Hensher has

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[89] http://www.theaustralian.com.au/news/asciano-to-shift-container-traffic-from-road-to-rail/story-e6frg6n6-1227562553590

[90] Page 2 http://www.cityofsydney.nsw.gov.au/__data/assets/pdf_file/0008/227690/140511-Final-Report_150409.pdf

[91] Page 2 http://www.cityofsydney.nsw.gov.au/__data/assets/pdf_file/0008/227690/140511-Final-Report_150409.pdf

noted public transport was *not* part of the modelling. "We must recognise opportunities for serious BRT [bus rapid transit] otherwise this entire exercise is nothing more than building another tolled road which is not what [WestConnex] is singularly about," There is no dedicated underground bus corridors built as part of WestConnex.[92]

The accuracy of traffic forecasts is of considerable interest in the toll road sector. One of the unresolved issues is that of the poor performance of traffic forecasts on proposed toll roads and tunnels in urban Australia. The ratio of actual traffic on opening a toll road facility to that of the forecast traffic confirms the optimism bias that has been identified.[93] In Australia, it has become clear that the traffic projections for most toll roads have been built around the financial model, not vice versa as it should be. And the financial model has been structured in such a way as to ''upfront'' or bring forward the project cashflows so bankers and their consultants could pocket billions of dollars in fees before even a cent was earned in tolls.[94]

The M4 East SSI 6307 EIS outlines that the Westonnex project in its entirety will assist in achieving goals identified in the NSW 2021 Performance Report (NSW Department of Premier and Cabinet 2014)[95] and NSW 2021: A Plan to Make NSW Number One (NSW Department of Premier and Cabinet 2011)[96] which of which growing public transport patronage as the project (as part of WestConnex in its entirety) is considered to be a key driver for the

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[92] http://www.smh.com.au/nsw/westconnex-has-a-numbers-issue-what-are-they-20140404-36400.html#ixzz3oz5PjE6k

[93] Black, J. (2014) Traffic Risk in the Australian Toll Road Sector in PUBLIC INFRASTRUCTURE BULLETIN Vol 1 Issue 9 at page 10 http://epublications.bond.edu.au/cgi/viewcontent.cgi?article=1058&context=pib

[94] Black, J. (2014) Traffic Risk in the Australian Toll Road Sector in PUBLIC INFRASTRUCTURE BULLETIN Vol 1 Issue 9 at page 10 http://epublications.bond.edu.au/cgi/viewcontent.cgi?article=1058&context=pib

[95] http://www.nsw.gov.au/sites/default/files/initiatives/nsw_2021_performance_report.pdf

[96] http://www.ipc.nsw.gov.au/sites/default/files/file_manager/NSW2021_WEBVERSION.pdf

introduction of a rapid transport solution (ie buses or light rail).[97] Note this is ***not*** building the infrastructure required, such as light rail networks or dedicated bus lanes on the roads and through the tunnels.

It is highly unlikely that there will be sufficient demand to ensure the various WestConnex tolls roads are viable. Journey to work data does not support construction of WestConnex. Analysis suggests that the travellers in the key catchment, those intended to be users, are more likely to make use of public transport. Only four per cent of workers in Penrith, St Marys and Camden travel to the CBD. Furthermore, 90 per cent of work trips to the CBD from the west are made by public transport – compared to 74 per cent for Sydney overall. This suggests that major public transport improvements in this corridor might be a better way of managing travel needs and stimulating urban renewal. [98]

The M4 East SSI 6307 EIS states that public transport options such as rail, light rail or bus would be feasible potential alternatives if the project, as part of WestConnex, was primarily concerned with transporting people to and from centres.[99] However, the key customer markets identified for the project include highly dispersed and long distance passenger movements, as well as heavy and light freight and commercial services and businesses whose travel patterns are also greatly dispersed and diverse in nature.[100]

The Westconnex Executive Summary Business Case Strategic Overview claims that 55% of Western Sydney residents currently travel to jobs east of Parramatta by car.[101] The SGS Economics

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[97] page 3-2 Volume 1A

[98] Page 2 http://www.cityofsydney.nsw.gov.au/__data/assets/pdf_file/0008/227690/140511-Final-Report_150409.pdf

[99] page 4-7 https://majorprojects.affinitylive.com/public/4b70b2e3a1143795114f6b619c02af12/EIS_Volume%201A.pdf

[100] page 4-7 https://majorprojects.affinitylive.com/public/4b70b2e3a1143795114f6b619c02af12/EIS_Volume%201A.pdf

[101] The Westconnex Executive Summary Business Case Strategic Overview page 10 http://www.westconnex.com.au/documents/westconnex-executive-summary-september-2013.pdf

and Planning report claims the proportion of workers in Sydney's west travelling to jobs in the east is low, and of these, most are made by public transport. Residents in Western Sydney are half as likely to work in the east compared to the rest of Sydney. Of those who do travel to work in the east, 90 percent of these trips are made by public transport. [102]

At the Grattan Institute *Productive Cities* seminar in Sydney in May 2013, Malcolm Turnbull identified public transport infrastructure as being a "social justice issue" which was "tragically" neglected.[103] Mr Turnbull advocated for increased public transport infrastructure, which he said was crucial for Australian cities' development, and somewhat lacking in Sydney:

> "*We've tragically neglected transport infrastructure – particularly public transport infrastructure – in this city. If you don't have adequate transport you discriminate against the old, the young, the poor and the sick. This is a social justice issue. It's a question of social equity.*"[104]

Not all Australians are able to drive, have access to, or own a vehicle. For these people, a city which is car dependent restricts their access to services, employment, shops, social and other activities. Under the Australian Governments Liveable Cities program, a key goal was to improve accessibility and reduce dependence on private vehicles through improving transport options.[105] [106]

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[102] page 44 http://www.cityofsydney.nsw.gov.au/__data/assets/pdf_file/0008/227690/140511-Final-Report_150409.pdf

[103] http://www.thefifthestate.com.au/innovation/planning/turnbull-calls-for-public-transport-infrastructure-funding/49735

[104] http://www.thefifthestate.com.au/innovation/planning/turnbull-calls-for-public-transport-infrastructure-funding/49735

[105] http://www.abs.gov.au/AUSSTATS/abs@.nsf/Lookup/4102.0Main+Features40July+2013#end5

The Federal Government's Institute of Family Studies found that car based urban planning detrimentally disadvantages specific sub-groups in the community (low income households) – essentially forcing them to own a vehicle ("forced car ownership") and committing them to the associated financial stresses of vehicle ownership – maintenance, registration and tolls etc.[107]

Bureau of Transport NSW household travel survey statistics[108] released in 2013 show that:

> *In support of NSW 2021 goals, public transport and walking trips grew at a faster rate (23% for train, 16% for bus, and 15% for walking trips) than private vehicle trips (6% for car driver trips and 6% for car passenger trips) in the past decade.*
>
> *Social/recreational trips and education/childcare trips increased the most (17% for each), while work-related business trips (-17%) and personal business trips (-16%) fell.*
>
> *Over the decade, the data shows the population grew by 12%, distance travelled for education/childcare grew by 30%, implying children are travelling further and are increasingly less likely to go to their closest school. Distance travelled for personal business decreased by 20% over the same time period, consistent with the growth of the internet and mobile technologies.*
>
> *The total daily travel time per person remained unchanged at 79 minutes.* [109] [110]

106

5. Department of Infrastructure and Transport, 2011, Our Cities, Our future: A national urban policy for a productive sustainable and liveable future, <http://www.infrastructure.gov.au/>.

107 https://aifs.gov.au/cfca/publications/relationship-between-transport-and-disadvantage-austr

108 http://www.bts.nsw.gov.au/ArticleDocuments/79/r2013-08-hts-summary.pdf.aspx

109 Page 9 http://www.bts.nsw.gov.au/ArticleDocuments/79/r2013-08-hts-summary.pdf.aspx

110 Page 23 Sydneysiders spent an average of 79 minutes travelling each weekday. This has remained unchanged for the last decade.

Train (23%) and bus (16%) trips rose faster than the population in the last decade. [111] Those commuting to work by public transport were most likely to do so because they were avoiding parking problems (53%). A third (33%) of PT commuters travelled to work by PT because it was cheaper than travelling by car. Many PT commuters (31%) travelled to work by PT because it was faster than travelling by car. [112] Compared to 2001/02, people aged 30 years and below were less likely to drive in 2011/12. Those aged over 60 were more likely to drive in the recent year. [113] This trend in vehicle ownership and use is reflected nation-wide, with ABS reporting similar findings.[114]

In March 2013, when the then Prime Minister Julia Gillard offered $1billion in funding for Sydney's WestConnex, based on it meeting 3 conditions: (1) go all the way to the CBD, (2) it must go all the way to Port Botany, and (3) the government must not impose tolls on currently untolled roads, the then Premier Barry O'Farrell immediately dismissed the offer, claiming that fulfilling those three conditions would cost $5-9billionn in additional construction and lost revenue.

It is the first point, the linking of WestConnex through to the CBD, that obtained the most attention, and here Mr O'Farrell got it right. Many transport experts supported the decision to not send WestConnex right into the CBD. It's worth remembering that private vehicles on roads do a terrible job of moving large numbers of people to a single place: a single track of rail has ten times the capacity of a single lane of road. Building more roads into the CBD cannot solve congestion on the roads leading into the CBD, it won't eliminate the bottleneck – it will merely shift it closer to the CBD. Not only is CBD road space limited, but also so are parking

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http://www.bts.nsw.gov.au/ArticleDocuments/79/r2013-08-hts-summary.pdf.aspx

[111] Page 17 http://www.bts.nsw.gov.au/ArticleDocuments/79/r2013-08-hts-summary.pdf.aspx

[112] Page 19 http://www.bts.nsw.gov.au/ArticleDocuments/79/r2013-08-hts-summary.pdf.aspx

[113] page 26 http://www.bts.nsw.gov.au/ArticleDocuments/79/r2013-08-hts-summary.pdf.aspx

[114] http://www.abs.gov.au/AUSSTATS/abs@.nsf/Lookup/4102.0Main+Features40July+2013

spaces, and both of these are a poor use of the very limited space available in the city centre.[115]

Australian Bureau of Statistics journey to work data from the 2011 Census shows that Sydney remains the major Australian city with the highest proportion of public transport trips to work.[116]

Then there is the Transport for NSW and Roads and Maritime Services Sydney CBD projects, involving a series of transport infrastructure projects, which incidentally are currently underway, across greater Sydney with a key focus on the city centre.[117] Part of the CBD works is the construction and operation of a light rail service from Circular Quay to Kingsford and Randwick via Surry Hills, including approximately 20 light rail stops, interchanges at ferry, rail and bus stations along the route and the transformation of a section of George Street between Hunter Street and Bathurst Street, Sydney into a pedestrian zone.[118] The EIS of the CBD and South East Light Rail (CSELR) project states it was necessary to transform the transport system within inner Sydney and provide a step change
in transport capability, reliability and capacity. [119] The problems from congestion were reducing Sydney's productivity and urban amenity which created transport congestion, unreliability, significant economic and social impacts and a degraded environment (particularly along the George Street corridor). In response the CSELR would free up road capacity, transferring CBD trips from existing buses and private vehicles onto the light rail and along the proposed George Street pedestrian zone. In tandem with other Sydney bus network changes as part of the Sydney City Centre Access Strategy (SCCAS), the CSELR

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115 http://www.smh.com.au/federal-politics/political-news/critics-slam-gillards-plan-for-motorway-to-the-city-centre-20130304-2fh2c.html

116 http://www.censusdata.abs.gov.au/census_services/getproduct/census/2011/quickstat/1GSYD?opendocument&navpos=220

117 http://www.cityofsydney.nsw.gov.au/vision/city-transformation

118 http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=6042

119 page E-3 https://majorprojects.affinitylive.com/public/ee4241b76393b91aea89ae55b47ffd8d/01%20CSELR%20EIS%20-%20Table%20of%20Contents%20and%20Executive%20Summary.pdf

proposal would lead to approximately 220 fewer bus trips during the morning peak periods within the CBD.[120]

The EIS of the CSELR project also noted that the transport system does not have the capacity to support growth — in response the CSELR is to support future economic growth by improving public transport capacity, quality and reliability.[121]

The proposed benefits of the CSELR would be negated with the Westconnex project in its entirety, as the WestConnex project will ultimately funnel traffic into the CBD, which will have a further reduced capacity for vehicle traffic. The planning processes of both projects do not take into account their respective impacts.

AIRPORT

WestConnex is supposed to respond to future strategic challenges pertinent to Sydney's economic productivity and liveability, including:

- An additional 36 million passengers forecast at Sydney Airport by 2033 resulting in significant vehicle trip generation on a heavily constrained and complex part of the road network. [122]
- Traffic in the Sydney Airport precinct includes a mixture of airport traffic and through traffic destined for Port Botany, Sydney CBD and Sydney's north.[123]

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[120] page E-3 https://majorprojects.affinitylive.com/public/ee4241b76393b91aea89ae55b47ffd8d/01%20CSELR%20EIS%20-%20Table%20of%20Contents%20and%20Executive%20Summary.pdf

[121] page E-3 https://majorprojects.affinitylive.com/public/ee4241b76393b91aea89ae55b47ffd8d/01%20CSELR%20EIS%20-%20Table%20of%20Contents%20and%20Executive%20Summary.pdf

[122] (SACL 2013, p.38)

[123] PAGE 10 WESTCONNEX M4 East Homebush Bay Drive to Parramatta Road and City West LinkState Significant Infrastructure Application ReportWestConnex Delivery Authority November 2013 https://majorprojects.affinitylive.com/public/657170f6b7df3b19bda88a222fd0ec4b/WestConnex_M4%20East_SSI%20Application%20Report.pdf

However, the construction of Sydney's second airport will begin next year in 2016. The runway will be able to accommodate the largest plane in the sky — the A380.A 3km transport tunnel has been earmarked on the schematics for a future underground rail link to the airport.

The first stage, which will be completed within eight years and be able to take 10 million passengers a year. The final design reveals a major international airport complex forecast to take 80 million passengers a year, twice the number currently serviced by Sydney Airport at Mascot. [124]

The draft *Environmental Impact Statement (EIS)* and *Airport Plan* by the Federal Government highlights the need for proper transport links, with the Western Sydney Director of the Sydney Business Chamber, David Borger saying:

> *Access to Badgerys Creek by road alone is completely unsustainable and rail should be a key mode of transport. We need to invest in a rail network that can create fast transport links that connect the airport to Sydney city, Liverpool and Parramatta.*[125]

The airport passenger numbers projected by AECOM for the Westconnex M4 East SSI 6307 EIS at Sydney Airport above do not co-relate with the numbers projected for the Badgery's Creek passenger numbers.

As stated above, the SGS Economics and Planning report concluded that the construction the Moorebank Intermodal Freight Terminal (and smaller intermodal terminals around Sydney) may mean that the M5 extensions between Sydney Airport / Port

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[124] http://www.dailytelegraph.com.au/news/nsw/badgerys-creek-airport-sydneys-bold-plan-is-taking-wing/story-fni0cx12-1227304121459

[125] See Appendix 1 - Media Release Sydney Business Chamber Monday, October 19 2015 Airport on track to deliver jobs to Western Sydney

Botany and Western Sydney are not required,[126] and noted Business Case for WestConnex was completed prior to the announcement of the second Sydney airport at Badgerys Creek, which would change the distribution of passenger and freight movements around Sydney.[127] The Westconnex Executive Summary Business Case Strategic Overview uses data[128] from the NSW Long Term Master Transport Plan, a document developed in 2011, of which the "trips to the airport" is merely a boxed pull quote, illustrated below:[129]

[126] Page 2 http://www.cityofsydney.nsw.gov.au/__data/assets/pdf_file/0008/227690/140511-Final-Report_150409.pdf

[127] Page 2 http://www.cityofsydney.nsw.gov.au/__data/assets/pdf_file/0008/227690/140511-Final-Report_150409.pdf

[128] page 10 http://www.westconnex.com.au/documents/westconnex-executive-summary-september-2013.pdf

[129] p117 NSW Long Term Master Transport Plan http://www.transport.nsw.gov.au/sites/default/files/b2b/publications/nsw-transport-masterplan-final.pdf

4.6 Customers' travel needs are changing

TRIPS TO THE AIRPORT

Travel demands associated with Sydney Airport continue to grow. At present, around 100,000 trips are made every weekday to and from the Airport. Roughly one third (36 percent) of these trips start in the CBD and inner Sydney, with the next greatest proportion of travellers (13 percent) coming from the North Shore/ Northern Beaches. The majority of these travellers must pass along the Airport to CBD corridor to reach the airport.

Activity at Sydney Airport is forecast to double over the next 25 years: from 36 million trips each year to 79 million trips. This means that airport traffic by itself will have a major impact on the corridor, before any other growing demands are taken into account – such as travel from South West Sydney to the CBD or an increase in freight bound for Port Botany.

While Sydney's transport system serves many communities well, it needs to adapt to the changing requirements of some places and people. The Long Term Transport Master Plan has identified six travel requirements where our transport system needs to provide better support.

4.6.1 Our growing demand for off-peak and weekend travel

Sydneysiders' travel patterns are changing, with a trend emerging of more off-peak and weekend travel. Frequency of services is listed by public transport customers as one of the most important factors in how satisfied they are with the services they use. But at some times of the week, services are much less frequent despite demand being relatively high. In part, this is due to historic reasons. Our transport system was developed largely to cater to a nine to five, five-day working week. As working patterns and lifestyles change, many more of us now want – and need – to travel outside peak times. The rise of the services sector has contributed to this change in demand, with

SOCIAL AND ECONOMIC

The NSW Long Term Transport Master Plan sets out at 5.2 the growth challenges for NSW, particularly equipping Greater Sydney for Jobs growth. This master plan sets out the framework for the NSW state government to deliver an integrated and modern transport system, which identifies and guides planning, as well as underpinning policy decisions. With respect to local populations and jobs, the Master Plan states:

> *The fastest growing part of Greater Sydney is Western Sydney. Today, Western Sydney is home to 47 percent of Sydney's residents, and 37 percent of Sydney's jobs. Only around a quarter of these jobs are located in Western Sydney's centres, which means Western Sydney residents on average have to commute further than people elsewhere in Sydney. This challenge is increased by lower density development in much of Western Sydney, which increases car dependency and tends towards street-based public transport that can cover wider areas. The draft Metropolitan Strategy for Sydney sets out the largest employment centres in Western Sydney which are Parramatta (47,000), Penrith (16,000) and Liverpool (22,000). The evidence indicates that Western Sydney residents, who hold around 72 percent of Western Sydney jobs, want to work closer to home. As employment increases across the metropolitan region, centres in the Global Economic Corridor of Sydney are likely to experience some capacity constraints and rent increases, leading to non-essential CBD businesses and activities seeking more cost effective locations elsewhere. Western Sydney's centres offer an attractive, lower cost location provided the land and workforce, and business to business links are in place. This trend is an opportunity for economic centres located closer to where people live in Greater Sydney to take advantage of spillover economic activity, and to develop local industries in their own right. In transport terms, this would reduce the impacts of dispersed employment in Greater Sydney, alleviate car dependency*

and long commutes, and promote more liveable communities. [130]

The Westconnex M4 East SSI 6307 EIS contradicts the data collected in the Master Plan, asserting that:

> *While growth in jobs in Western Sydney is expected to be strong, it is not expected to match the numbers of new jobs forecast in the eastern half of Sydney. Workforce and employment forecasts between 2011 and 2031 indicate that employment will remain higher in eastern Sydney than in the west. This increase in population in Sydney's west (without a similar rate of jobs growth) will significantly increase travel demand towards the east (where the majority of jobs will exist) on an already constrained transport network, particularly along the M4 and Parramatta Road corridor* [131]

The small proportion of workers from Sydney's west who work in the east tend to be employed in the manufacturing and transport-related industries. This proportion is likely to decline, with job growth around the second airport. The Moorebank Intermodal Freight Terminal will also change the pattern of freight movements.[132]

The NSW Long Term Transport Master Plan consultation process was undertaken over 12 months, and involved "unprecedented engagement with our customers, experts (industry, government and business) and the community."[133] The Westconnex M4 East

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[130] page 181 NSW Long Term Transport Master Plan December 2012 **http://www.transport.nsw.gov.au/sites/default/files/b2b/publications/nsw-transport-masterplan-final.pdf**

[131] page 3-11 https://majorprojects.affinitylive.com/public/4b70b2e3a1143795114f6b619c02af12/EIS_Volume%201A.pdf

[132] page 1 SGS Economics and Planning (Feb 2015) Strategic Review of the WestConnex Project http://www.cityofsydney.nsw.gov.au/__data/assets/pdf_file/0008/227690/140511-Final-Report_150409.pdf

[133] page 388

SSI 6307 EIS cites A Plan for Growing Sydney (NSW Government 2014a)[134] as its source for job creation in Western Sydney and stronger job growth in Eastern Sydney.[135]

That the Westconnex M4 East SSI 6307 EIS was prepared by AECOM[136] is concerning with respect to vague citations which lack pinpoint references to data which allowed them to forecast employment remaining higher in the east of Sydney than in the west. AECOM is the company with a questionable prediction record[137] and has also been awarded contracts in the Westconnex project for both for construction, as well as assessing environmental risks and preparing the Westconnex M4 East SSI 6307 EIS - a clear conflict of interest. AECOM was subject of legal action in Queensland, where more than 650 investors are sued the company for allegedly inflating traffic predictions for a private toll-way in Brisbane.[138]

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http://www.transport.nsw.gov.au/sites/default/files/b2b/publications/nsw-transport-masterplan-final.pdf

[134] http://www.planning.nsw.gov.au/Plans-for-Your-Area/Sydney/A-Plan-for-Growing-Sydney

[135] p 3-13
https://majorprojects.affinitylive.com/public/4b70b2e3a1143795114f6b619c02af12/EIS_Volume%201A.pdf

[136] in conjunction with GHD Pty Ltd

[137] Insolvency firm KordaMentha accuses AECOM of 'misleading and deceptive conduct' and making 'negligent misstatements' by ambitiously forecasting more than 100,000 vehicles a day while actual traffic volumes only totalled 22,000 a day. The insolvency firm also alleges Aecom had predicted future demand by referencing a 'one-hour demand forecast from a two-hour weekday peak-hour period' without 'allowance for seasonal adjustments' including school holidays."We believe the work done by Aecom to support their traffic forecasts was substandard. We have engaged third party experts to review their output," says KordaMentha partner Martin Madden.After RCM's Clem Jones Tunnel (Clem7) consistently failed to meet projected targets, the group financially collapsed in February 2011 with debts totalling $1.3 billion.

http://www.businessnewsaus.com.au/articles/traffic-forecasters-sued-for-clem7-numbers.html

[138] http://www.wsj.com/articles/aecom-technology-says-australia-toll-road-lawsuit-could-hurt-result-1407925288

CONCLUSION

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

We reiterate - as Owners Committees of **SP67711** (125 Euston Road Alexandria, comprising of **34 residential lots**) and **SP72036** (95 Euston Road Alexandria comprising of **59 residential lots**) we strongly object to the M4 East SSI 6307 EIS proposal as it is not well thought out. It is clear that the Westconnex motorway will struggle to achieve its aims of providing a long-term solution to heavy traffic - it is doubtful that any type of motorway will do this.

That the State Government has already signed multi-billion dollar contracts for WestConnex before this EIS was even placed on public exhibition undermines community confidence that this is a genuine consultation process.

The lack of a business case, compounded by job growth and traffic modelling figures by a company which has been sued for "misleading and deceptive conduct" for providing grossly inaccurate predictions for similar infrastructure works is cause for great concern. The planning of this project has not taken into consideration other connecting major infrastructure structure works, nor does it adequately address needs identified in the various frameworks, strategies and policy directives which inform decision-making, particularly those with respect to transport and infrastructure.

We, the Owners Committees of SP67711 (125 Euston Road Alexandria, comprising of 34 residential lots) and SP72036 (95 Euston Road Alexandria comprising of 59 residential lots, strongly object to this proposal as it will have devastating impacts on local communities and fails to provide a long term solution to traffic and congestion.

Signed on behalf of SP67711 Signed on behalf of SP72036

Yolanda Floro (Chairperson) Paul Christie (Chairperson)

Appendix 1

Media Release Sydney Business Chamber

Monday, October 19 2015

Airport on track to deliver jobs to Western Sydney

The Sydney Business Chamber, the leading advocate for the Western Sydney Airport, said today's release of the draft Environmental Impact Statement (EIS) and Airport Plan by the Federal Government is a great step towards lift off in 2025.

The Western Sydney Director of the Sydney Business Chamber, David Borger said, "The EIS is a significant milestone in the delivery of an airport for Western Sydney and the Airport Plan highlights the opportunities available.

"Western Sydney needs more jobs and this airport is the best chance we have for creating a long term employment solution, but if it is to deliver jobs, it needs proper transport links, holistic planning and a world class design.

"Access to Badgerys Creek by road alone is completely unsustainable and rail should be a key mode of transport. We need to invest in a rail network that can create fast transport links that connect the airport to Sydney city, Liverpool and Parramatta.

"We hosted two international aviation and planning

experts at our Preparing for Take-off conference earlier this year, and both agreed that improving the speed and reliability of transport networks is vital to success of the Western Sydney airport.

“In his report analysing the potential growth of a Western Sydney airport, aviation expert Dr John Kasarda said passengers need to access the airport in no more than 45 minutes for the airport to be commercially viable.

“To ensure commercial success, we also need to adopt all-inclusive planning because if we get the preparation right, we will completely transform Western Sydney and ensure its prosperity for generations to come.

“If this airport is to be up and running in ten years, proper planning and coordination between all parties, including the business community, is essential.

“The Chamber is currently working with government to establish an independent authority to oversee and manage the airport’s planning and delivery.

“We want an airport that utilises an Aerotropolis strategy that gives businesses rapid connectivity to their suppliers, customers, and enterprise partners, nationally and worldwide.

“According to Dr Kasarda, aviation is shaping the new global economy and 35% of the value of world trade already moves by air.

“If Western Sydney embraces an Aerotropolis strategy, the benefits will be monumental, for the region and the country.

“The government is predicting that 80 million passengers will use this airport by 2060, twice the number currently serviced by Sydney Airport at Mascot.

“This is a big airport that requires big thinking.

“Comprehensive planning needs to start now so we can create an opportunity for new companies to gravitate to the precinct surrounding the airport and establish a jobs engine for Western Sydney,” said Mr Borger.

Media contact: David Borger 0408 239 262 or Kate Bryant 0424 186 367