Director, Major Projects Assessment Department of Planning GPO Box 39 Sydney NSW

Submission: WestConnex M4 East EIS (SSI 6307)

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

Firstly I would like to express my dismay at the contempt the government is showing its own planning system and people by entering into a contract with a construction company prior to the completion of the environmental impact statement or assessment process. This ignores the right for meaningful consultation and discussion of developments which are provided in the planning system and questions the impartiality of the whole assessment process.

The EIS process is supposed to allow for genuine public input and to result in approval or non-approval or approval with modifications. Entering into a contract prior to this increases the risk to the people of NSW. This poor level of consultation is reflected by the choice of displays in shopping precincts, none of which occurred in close proximity to the worst affected suburb of Haberfield, with Burwood being the closest.

This contempt is further reflect in the fact the government is not prepared to provide the business case for the project despite repeated parliamentary requests. Clearly the case does not stack up which is why the government is building it rather the private sector. This is after all a project which failed to gain support from Infrastructure Australia due to it being poorly considered and uneconomic.

Secondly, I am alarmed at the number of errors in relation to place names, street names etc. These are simple things which are easily reviewed and checked yet are frequently incorrect within the document. This sloppiness reflects both a poor understanding of the place being assessed but a clear lack of rigor to the construction of the assessment in the first place. If you can't get street names correct what chance do you have of modelling any of the impacts.

Two examples:

- 1.The Infants Home, Ashfield A site which you are meant to have attended and interviewed is called up as the Infants Home, Haberfield.
- 2. Appendix G Page 11-5 Heading Dobroyd Parade and Timbrell Ave should read Timbrell Drive.

These are not isolated and occur throughout the documents.

The assessment itself:

Transport Planning

A potted history of the M4 corridor is discussed. This history conveniently leaves out the section related to the corridors originally being identified as part of the County of Cumberland Scheme. This included government acquiring significant tracts of land to preserve the corridor. This plan however was identified as poorly conceived in the 1980's when it was realised that building motorways and funnelling traffic to the centre of town was not the answer to traffic congestion. This is reflected the world over where highways radiating around the city are the focus and there is renewed focus on public transport systems. The fact that motorways generate traffic is well understood and reflected

in the Sydney road network. This is why the M5 East tunnel was at capacity almost from time of opening, and why the City West Link is above its forecast capacity.

Transport forecast have also been shown to be consistently wrong with all free most recent tunnel projects having seriously flawed traffic calculations. What assurity is there that the numbers within this assessment are any more reliable than the flawed numbers for the Cross City Tunnel, Lane Cove Tunnel and M5 East Tunnel.

Transport Options

The assessment does not provide a detailed discussion of transport options public of otherwise. A key element of the report system focuses on heavy vehicle usage yet consideration of a dedicated freight tunnel is not discussed, nor the impacts of the establishment of freight terminals in association with dedicated freight lines at the perimeter of Sydney. All of which have the potential to influence the make up traffic yet are not considered.

It assumes that public transport will be provided along the Parramatta Road corridor at a later date rather than committing to as part of the project. Surely it should form the basis of the proposal that a viable public alternative is provided to the use of the Motorway.

Sustainability and Core Values of the WestConnex

While there are a set of values which allude to a sustainable and balanced solution for the project, these are not evident in the response to key Principles. The following items in italics are directly from the EIS and demonstrate failure to achieve compliance:

Principle: Protect and enhance the natural environment and local heritage

Response: While there would be impacts on non-Aboriginal heritage, including the Powell's Estate Heritage Conservation Area (HCA) and the Haberfield HCA, these impacts have been minimised and/or mitigated where practicable.

While acknowledgement is made of impacts the assessment skirts over the significance and nature of the impacts identified in the specialist reports which identify that the heritage value of the National Estate Listed Suburb of Haberfield are significantly impacted by demolishing houses, protected by the Heritage Conservation area of the suburb, for the construction of ventilation stack. Yet discussion of alternate sites is not given. The commercial/ industrial site opposite the ventilation site at Wattle Street ie Bunnings could both accommodate and incorporate such a structure and retain much of the urban fabric of the intersection.

The urban design response for the surplus lands in this area is a lack lustre approach of creating a relatively useless landscape space which does not even pick up on the significance of the site as the birth of the Garden Suburb movement in Australia and certainly doesn't add to the overall usability and desirability of the openspace within the area.

Principle: Contribute to liveable communities (ease congestion, connect communities, integrate land use and transport planning and facilitate urban revitalisation)

Response: Create/enhance public open space. Following construction, there would be a number of locations where there would be residual land (ie land required for construction but not operation), including at the Concord Road, Wattle Street and Parramatta Road interchanges. There would be opportunities for this residual land to be used for open space, which would represent an increase in the amount of open space in the locality.

While the use of residual landscape may contribute to the enhancement of the road corridor it is not a meaningful contribution to the liveability of the suburb and certainly isn't portrayed in a way that this would be considered.

Liveability if far wider in its parameters than just giving back greenspace and its requirements are clearly defined in a Roads and Maritime Service publication on the very issue. Liveability relates to general amenity, connectivity and the fit of the road within the place through it passes and the things that make this infrastructure an integral part of the functioning of the community. In this respect the proposal has a number of unresolved issues:

For example the management of traffic – both through and local traffic. Presently important local connections such as Mortley Avenue are suggested to be closed to access from the north to enhance functionality of the project without assessing how this impacts local traffic movements or the public transport system. Waratah Street is also identified as having a dedicated discharge from the tunnel encouraging through traffic despite the presence of the local primary school but restricting the present local traffic movement which links to Five Dock.

Both these roads form an important local road function but this is not acknowledged in the assessment or even understood. A detailed liveability study needs to be undertaken for the alignment to ensure that enhancements are made where they are meaningful and contribute to the healing of the suburb.

Overall there appears to be limited justification for the project or sufficient resolution of local interface matters to provide a comprehensive and clear assessment of impacts.