

Director, Major Project Assessments  
Department of Planning  
GPO Box 39  
SYDNEY NSW 2001

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

I write to express my strong objection to the WestConnex M4 East motorway proposal as well as the entire WestConnex project in entirety.

I am very concerned that the WestConnex project has been ill conceived, and the weaknesses of the proposal have been amplified through poor project governance.

**I strongly urge the Department of Planning & Environment to reject the M4 East EIS – as well as the entire WestConnex project as not in the best interests for Sydney.**

I am concerned that, (in my estimates), up to a million people across the entire WestConnex project will be permanently and highly impacted by a motorway that will not ease Sydney's congestion\_ as conceded by the M5 KGR Interchange and the M4 East EIS – for what is clearly for the benefit of a few Corporate vested interests. Just the M4 East footprint alone is 300,000 residents and 64,000 employees.

I have endeavored to cover all aspects of the WestConnex project from a holistic perspective of the entire project impacts, as well as focusing on the minutia of the M4 East.

The WestConnex project will have a **devastating impact** on middle, inner and South Sydney – as well as a lost opportunity for alternate investment in solutions that will address congestion.

**The WestConnex project does not fit within the rationale of the NSW Master Transport Plan – for which it claims it is front and center despite retrofitted after the initial Plan release:**

*“Regular physical activity is important to our health and wellbeing. Recent research shows that many people get an additional eight to 10 minutes of exercise each day when they use public transport. Importantly, being active for part of our journey to work or school incorporates exercise into our daily routines. The NSW Centre for Population Health has observed that public transport use, walking and cycling are associated with a number of health benefits, including a reduced incidence of obesity, higher levels of exercise and improved mental health.*

*Building social and community goals into our transport planning will strengthen communities, reduce disadvantage and open up opportunities. To meet our objective of reducing social disadvantage, we will require new ways of thinking about how to distribute transport services more evenly across the State. We will need to give people healthier travel options, such as making it easier and safer to cycle to work or walk to the nearest train station. We will also need to integrate our transport system more closely with land use planning, creating well-designed cities and suburban centres that **reduce our reliance on cars**, encourage us to be more active and produce safe, attractive and well-used urban spaces”.*

## Summary of objections based on subject area:

My objections are based on a holistic review – attempting to cover in-depth across a broad range of subjects within a short 55 day review. This is in itself a **corruption of the democratic process** to deny the public the opportunity to digest 5000 page EIS – and intelligently respond – within 55 days.

1. The project has failed to follow correct due Governance
2. The project does not complement the rationale of the NSW Transport Master Plan.
3. The project failed to properly assess transport alternatives
4. The project fails to meet its own stated core objectives
5. The project fails to address Noise and vibration
6. The project represents lost opportunity for better transport investment
7. The project fails justification that it is in the best interests for the public
8. The project negatively impacts a significant number of people
9. The project fails in applying an appropriate solution to a 21<sup>st</sup> century problem of congestion
10. The project contributes to carbon emissions
11. The project will be responsible for poor air quality
12. The loss of heritage is unacceptable
13. The community has been treated in contemptuous manner
14. The loss of our say in the future of OUR city

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# 1 Failure of Project Governance

**I object to the entire WestConnex project as it has failed to follow the correct and disciplined project governance requirements. Please respond to the below**

## 1.1 Lack of Transparency and Proper Process in Project Selection

The Federal and NSW governments have called WestConnex the largest road infrastructure project in Australia's history. For such a major piece of infrastructure it has had a relatively short period of review. It appears to have been 'fast-tracked' bypassing important evaluation steps aimed at providing assurance to government and the taxpayers that the project is the best solution.

The Productivity Commission in its recent inquiry into public infrastructure found, "an urgent need to comprehensively overhaul processes for assessing and developing public infrastructure projects."

It pointed to "numerous examples of poor value for money arising from inadequate project selection, potentially costing Australia billions of dollars". It argued that further spending under the status quo will simply increase the cost to users, taxpayers and the community, and lead to more wasteful infrastructure.(1)

At the request of the Senate Select Committee into the Abbott Government's Budget Cuts, the Grattan Institute recently prepared a paper on infrastructure financing and expenditure with a focus on transport infrastructure.(2)

"To get a better return from infrastructure spending, governments should focus on **\*\*selecting the right projects, and on making the business cases and their underlying assumptions more transparent\*\***. Governments can also get a better return through use of new technologies to get more value out of existing infrastructure; through minor augmentation and relief of pinch points; and through more systematic maintenance.

**"The capacity to waste money is a serious risk for infrastructure, given the very large amounts of money involved." (p.1)**

"Infrastructure investment over the past five years has been about one per cent of GDP higher than a decade earlier. Such a significant increase would have been expected to have some visible effect on GDP growth. There is no evidence it has done so, with GDP growth still well below three per cent per annum and below historic growth rates.

**"The wrong projects can destroy value and divert funds from projects that would be more valuable to the economy and community." (p.4-5)**

"Australia could get better value from public infrastructure by making better project selections. Unreliable or non-existent cost-benefit analyses have been an obstacle to optimal project selection. Recent large infrastructure projects in Australia have typically suffered from cost overruns of about 15 per cent, while patronage has been



15 per cent lower than projected, on average. As a result, real cost-benefit multiples are expected to be about 25 per cent lower than projected on average. All other things being equal, this consistent overestimation of benefit-cost ratios is making uneconomic projects look viable at the approval stage.” (p.5)

Unfortunately, the WestConnex project **does not appear to be an example of industry best practice** in project selection and transparency (see NSW Auditor General’s comments below). Calls for the release of the business case have been opposed by both the Federal and NSW governments. **If there is such a compelling business case, then why isn’t it being shared with the Australian taxpayers who are bearing the risks associated with this project.**

The [NSW Auditor General’s Performance Audit of WestConnex](#) conducted in 2014 highlighted the importance of proper evaluation and identified some serious deficiencies in the development of the WestConnex project.

The Executive Summary concluded:

“In the period covered by this audit, the processes applied to WestConnex to provide independent assurance to Government did not meet best practice standards...

“The preliminary business case submitted for Gateway review had many deficiencies and fell well short of the standard required for such a document. Further, on our analysis, the business case put to the Government still included some deficiencies that independent Gateway reviews and external assurance arrangements, if they had occurred, should have identified...

“The post-business case governance arrangements did not clearly separate board-level responsibilities for commissioning from responsibilities for delivering the WestConnex project. After not separating the roles, they also failed to provide mechanisms to effectively manage the conflict between these roles.

“The WestConnex project offers several lessons. While good internal controls are critical, they are not a substitute for externally managed Gateway reviews. Steering committees and boards cannot be responsible for both project delivery and independent assurance and reporting to the Government. Responsibility for commissioning should be clearly differentiated from the responsibility for project delivery. Challenging deadlines heighten the need for good assurance but, paradoxically, also the risk of departure from best practice.” (p.3-4)

“The Government approved a new Major Projects Assurance Framework in December 2011...

“The objective of the Framework is to increase the Government’s confidence and assurance in planning and implementation of major projects through their entire lifecycle, specifically:

- prevent projects failing or not realising their stated objectives/benefits
- improve clarity in the feasibility phase of projects
- drive better governance
- inform Cabinet Infrastructure Committee intervention

“A key component of the Major Projects Assurance Framework is the Gateway review system. The Gateway system is a series of structured reviews at key decision points (gates) in a project’s lifecycle. Gateway gives the Government a level of independent assurance on:

- whether an investment in a project is warranted
- the strategic options considered
- the agency’s capacity to manage and deliver the project on time, on budget and achieve desired project outcomes
- whether a project is on track and ready to move to the next phase.”(p.10-11)

## 1.2 WestConnex Concept

“Based on the Major Projects Assurance Framework, we expected a Gateway review (or similar arm’s length, independent review) either during the concept phase or early in the development of the business case.

“The Major Projects Assurance Framework introduced a Gate Zero to provide assurance that projects are well justified after considering a wide range of options. A Gateway review or similar should therefore be conducted early in a project’s life cycle to provide assurance around whether:

- the need for a project is properly defined
- there is justification for addressing that need
- the best value means of servicing that need are being proposed after considering a broad range of alternatives and their associated costs and benefits.

“We also expected that Infrastructure NSW or some other body would have recognised the need for a Gateway review during the concept phase, or early in the development of the business case and taken steps to ensure this occurred, including reporting to the Cabinet Infrastructure Committee.

“There was no independent Gateway review or equivalent undertaken at the concept stage. Infrastructure NSW has indicated that the concept paper it prepared to advise Government before WestConnex was publicly announced was not subjected to any independent assurance reviews. The first gateway review was of the preliminary business case late in the business case development phase..

**“We saw no evidence that:**

- the Government specifically exempted WestConnex from the Major Projects Assurance Framework Gate Zero
- provided an explanation or justification for the variation from the Major Projects Assurance Framework
- the alternative approach adopted was assessed as being equivalent to, or better than, the Major Projects Assurance Framework.

“...we believe that a Gate Zero Gateway review should have been conducted. It would have provided independent assurance that the project was justified...”

**“Infrastructure NSW’s roles at this stage of the WestConnex project were in conflict.** It was responsible for developing the WestConnex concept and at the same time it was the key agency responsible for providing assurance to Government over major capital projects including WestConnex. A fundamental principle is separation between those providing independent assurance and those developing and delivering a project.” (p. 16-17)

### 1.3 Developing the business case

“Given no Gate Zero Gateway review was conducted during the concept phase, we expected one (or an equivalent arm’s length, independent expert review) at the beginning of this phase.

“In line with the Transport for NSW Investment and Gating System we also expected to see the following Gateway reviews (or equivalent arm’s length, independent expert reviews)

- a strategic business case review (Gate One)
- a preliminary business case review (Gate Two)
- a final business case review (Gate Three).

“We expected there would be acquittals of each of these reviews, and that the review reports and acquittals would be provided formally to Infrastructure NSW and followed up in each subsequent Gateway review or equivalent. We also expected regular progress reports to, and monitoring by, Infrastructure NSW.” (p.21)

“We expected to see outputs from the other peer reviewers but detailed reports were limited to infrastructure solutions, capital costs and traffic analysis. Even here, timing was a concern. The peer reviewer engaged to review the traffic analysis produced a report, but not until November 2013 after the business case went to the Government. The reviewer’s report indicated that the review was supposed to be continuous throughout the process of modelling, but the traffic modellers were too pressed for time to consult on a continuous basis with the peer reviewer. The reviewer described the exercise as more an audit than a peer review. The reviewer concluded that the traffic data he received in early August 2013 ‘raises questions about the underlying quality of the modelling’.

“The agencies concerned advised us that significant analysis and review of traffic numbers was undertaken by the specialist work streams established within the Project Office. However, we have seen no evidence of an independent, arm’s length review of the traffic analysis used for the final business case, by someone technically qualified to do so, before the business case was presented to the Government.

“We did not find peer review outputs for land use, urban planning or transport planning.”(p.26)

## 1.4 Gateway review of preliminary business case

“One formal, independent Gateway review was conducted during the development of the business case. This was on a preliminary business case.

“In its report to the Sydney Motorways Project Office (dated 14 June 2013), the Gateway Review Panel concluded that:

“due to lack of key information presented for the review, the Gateway Review Panel was not able to form a view on whether the project is a worthwhile and prudent investment (both economically and financially viable) for the NSW Government”.

“Further, the Gateway Review Panel stated that:

“A number of key documents were delivered later than anticipated and the Review Panel had very limited time to review the Silver business case.

“Relevant documentation relating to a number of critical areas of the business case was not available for review – these included the Governance Section, Financial Plan and Communications Plan. The absence of these documents did impact on the ability to review related sections.

“The Review Panel did not have access to a number of Stakeholders or documents that were considered essential in order to satisfactorily complete the review.

“The Review Panel noted that not all key benefits nor all key risks were adequately documented, and that the business case would benefit from these and other inclusions”. (p.28)

“The Gateway Review Panel also found the preliminary business case should have been more advanced than it was and would have benefited from previous iterations and review processes which had not occurred.

“The Gateway Review Panel’s ‘traffic light’ risk ratings against the Gateway criteria were all red and yellow, with no greens.”

(p.29)

*Red: critical and urgent – project strategy to address the shortcomings/recommendations is to be established before project is further progressed.*

*Yellow: Important and urgent – project should go forward with action on recommendations. Source: WestConnex preliminary business case Gateway review 2013.*

## 1.5 Matters a Gateway review may have identified

“We reviewed the final business case and identified some issues with the underlying analysis which we believe a full Gateway review should have identified.

“These deficiencies related to the way the business case dealt with risks around traffic projections, project cost, economic benefits, financial analysis, governance arrangements and the procurement strategy.” (p.31)

## 1.6 Purpose of the business case

“Roads and Maritime Services say that the assurance provided to the Government on the WestConnex business case was appropriate for its purpose.

“It says the overall objective outlined in the Business Case Implementation Plan was to “produce a business case that demonstrates the overall technical and financial viability of the WestConnex scheme, consistent with the State’s Fiscal Strategy”.

“Roads and Maritime Services advised that at the conclusion of the business case in July 2013, Stage 1 was regarded as being sufficiently developed to proceed to procurement and environmental planning phases. For the other stages, the business case outlined a pathway for their further development and planning. It says that it was always envisaged that there would be additional Gateway reviews conducted on the component parts of the scheme.

“Roads and Maritime Services’ arguments do not justify the lower level of independent assurance provided on WestConnex than that offered by the Major Projects Assurance Framework. The objective was to “produce a business case that demonstrates the overall technical and financial viability of the WestConnex scheme, consistent with the State’s Fiscal Strategy.” Approval of the business case was the key decision point so far for this project, and arguably the stage at which independent assurance was most critical.”(p.31)

**I reject the WestConnex project in its entirety as WDA have been unable to present any evidence of project viability.**

## 1.7 Solution mode prior to analysis

The ‘Captains Call’ to build a road was decided without exploring other options from an expert analysis of Sydney’s congestion problems. The intricate science of public transport was ignored, as well as decades of world experience that building motorways through an inner city does not solve congestion.

This project has had nothing to do with Infrastructure Australia’s processes, nothing to do with a strategic approach to building transport, nothing about getting better economic productivity, let alone sustainability.

Tony Abbott and Nick Greiner have had a bizarre aversion to Public Transport, thus leading to this enormous Folly.

It is unacceptable that out- of-touch politicians and ex-politicians should jump into solution mode and decide to build the WestConnex motorway. Leaving RMS/WDA staff scrambling to find something (anything) to justify the project.

It is unacceptable that correct project procedures of understanding the core problem and identifying the best solution that meets the cost / benefit analysis was ignored.

It is unacceptable that the recommendations of Independent Infrastructure Experts were ignored.

It is unacceptable that a spend of \$15.4billion (plus) and 10 years of destruction and inconvenience for upwards one million people is justified with a Sydney road network improvement of just one kilometer per hour. (\*source KGR M5 Vol 1 page v)

**On this basis I reject the entire WestConnex project as not the solution to Sydney's congestion.**

**Failure to abide by the Major Projects Assurance Framework and employ best practice governance from project inception has greatly reduced community confidence. The Community is being asked to comment on an EIS that is deficient in analysis of project justification.**

**A condition of consent for the M4 East should include adherence to the NSW Government's Major Projects Assurance Framework. Vital gateway reviews which should have been undertaken before the preparation of the EIS (and certainly before awarding construction contracts) should be commissioned, completed and made publicly available before any further approvals are issued.**



EIS submission Pub Night – Newtown Social Club October 28, 2015

## Footnotes

1. Inquiry into Public Infrastructure, Productivity Commission (2014)
2. Submission to Select Committee into the Abbott Government's Budget Cuts, Marion Terrill, Transport Program Director, Grattan Institute (August 2015)



## 1.8 Shutting down public scrutiny

As reported SMH 17 October 2015, the largest transport project in the country – WestConnex - is shielded from public scrutiny after the Government has transferred control to a “private corporation”. The Sydney Motorway Corporation. There are no representatives of transport agencies on the Board. A Board comprised of Treasury officials, builders and financiers.

According to Labor’s spokeswoman, Jodi McKay, it is “all about shutting down scrutiny”. She has also commented that “I do not understand how they can call themselves a private corporation when they have two minister share-holders”.

This era will be long remembered as a shameful corruption of the democratic process for NSW.

**On this basis I reject the entire WestConnex project as it concerns me greatly the loss of transparency by transferring the delivery of the project to a ‘private company’. This is not democracy.**

## 1.9 AECOM and Conflict of Interest

Experts and academics have been critical of the AECOM traffic studies for this project, one complaining that there is insufficient information about assumptions behind the Westconnex Traffic Model for other researchers to test it independently.

This can only add to community unease about the EIS and planning process, especially because AECOM has not used the opportunity of the EIS report to respond to or engage with independent consultants as SCG Consulting that have questioned its traffic predictions for the WestConnex M4.ely on government departments to seriously evaluate the project and engage with critiques. Unfortunately, the Planning Department will publish the responses to the EIS on its website. Westconnex and AECOM will then prepare a ‘responses report’. Planners, health experts and others inside government say they will then be pressured to sign off on the EIS, although many know it is poor social policy.

The same firm is the subject of an ongoing legal action in Queensland – more than 650 investors are suing for \$150 million, claiming the company’s traffic predictions for a privately-owned toll-road in Brisbane were substantially inflated

**Is it too much to hope that the Minister for Planning Rob Stokes and professional planners employed by the NSW government take time to seriously consider the substantial critiques of the project? From the public’s point of view, it would be so much better to stop now rather than be stuck with another failed tollway project.**

**On the basis on questionable independence and integrity of the planning assessment process I reject the WestConnex project in its entirety.**

## 1.10 Failed EIS Process

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 as well as the King Georges Road M5 Interchange the EIS is no more than a shoddy and evasive sales pitch.

I object because the whole process has been corrupted by the agencies who are its proponents. This is evidenced by, the awarding of contracts for the project, notice of compulsory acquisition of family homes and the planned destruction of local communities, all before the matter has been considered and approved.

These factors combined have left local residents feeling sad and angry about the process to date and left many feeling sceptical that there is any real concern about their rights and welfare. In addition no comprehensive business case has been presented and the arguments in the 5000 page EIS are simplistic and lack depth.

I object that the community was only granted 55 days to review the M4 East EIS. A minimum of 90 days should have been granted.

**On this basis I reject the entire WestConnex project due to the failed EIS process.**

### **1.11 Failure to engage in Community Participation & Discussion**

It is unacceptable that the community and councils have not been engaged in meaningful dialogue and involvement in the future of Sydney and this project.

- The various so-called ‘information sessions’ have been a sham
- The information kiosks are not attended by informed staff
- The distributed material contains information meant to mislead.
- The distributed material is specifically designed to not advertise the project

WDA repeatedly quotes unsubstantiated ‘benefits’ across the entire project, yet downplays negative impacts to just the immediate section.

It is time that there is a meaningful discussion on transport infrastructure in this city. It is time to address demand management.

It is time in 2015 to ramp up the campaign to raise public awareness of a healthier and environmentally friendly commute to destinations. It is time that Urban Planning incorporates models of walkability when planning new suburbs. It is time that the public become very aware of the real cost of driving – both financially and the space that automobiles and roads take up. And, it is time to really penalise single passenger vehicles when public transport is available via (eg) via tolls and congestion tax.

It is time that our cities are returned to the people. Sixty years of priority has been given to automobiles and their domination of our landscape vs the livability of our suburbs.

**I therefore reject the WestConnex project in entirety, as it has not been presented in a way that enables the public to determine if the proposal is an appropriate and effective solution for Sydney’s significant transport problems.**

### **1.12 Failure to disclose negative impacts in a timely and transparent fashion**

WDA has been known to hide negative information that is essential for the community to form an opinion. Recent examples:

- Information kiosks at the shopping centers and information sessions:
  - Failure to incorporate the locations of unfiltered stacks in material
  - Failure to disclose the amount of greenspace and parks lost to the motorway
  - Failure to properly disclose the tolls & reintroduction of tolls on existing roads
  - Failure to disclose the number of people that will be displaced



- Failure to disclose the number of businesses compulsory acquired and the jobs lost
- Failure to disclose the method of calculation & definition of “up to 10000 new jobs”
- Failure to disclose that there is no appropriate monitoring of PM2.5 and less.
- Information distributed to Arncliffe residents failed to disclose the horrible impact on the endangered Green and Golden Bell Frogs.
- Confirmation that an unfiltered exhaust stack at Kingsgrove was planned. WDA staff member was very evasive to confirm that this was fact in June 2015.
- The eventual disclosure stating that this stack was located in an industrial area. No. It is a business park and located near nine schools and many homes and places of employment

### 1.13 Failure to incorporate Community Feedback from EIS

WDA have never incorporated community feedback in their designs, as evidenced by residents impacted by the KGR M5 Interchange at Beverly Hills. Even if data contained in the EIS was pointed out as incorrect.

- The response to residents was ‘*we will explain it differently, so you might understand*’ our (flawed) vision.
- I object that all reasonable requests by Beverly Hills residents were denied on the grounds they were not reasonable or not feasible. The real answer is that the project is delivering the cheapest possible engineering design – at a permanent cost to residents.
- I object that the community and our local councils have been denied a voice.
- I object that residents have had to take extraordinary action to be ‘heard’.

## 2 WestConnex fails the objectives of the NSW Transport Master Plan

### 2.1 What came first – WestConnex or the Strategic Plans?

WestConnex is an anomaly to the NSW Transport Master Plan 2012

The WestConnex EIS claims that it was a legitimate part of the long term transport planning for NSW for which it is very obvious that it was retrofitted after the event.

The NSW Master Transport Plan December 2012 was written from the perspective of improving the mobility for residents and visitors to Sydney through the modernising and connectivity of Public Transport.

The focus mentioned frequently throughout the document was to reduce car dependency and thus congestion by investing further in the various modes public transport. The main initiatives were to address the lack of rail connectivity, by enhancing the current radial mode to be a more networked and connected system. It also included complementary improvements with other modes, such as increase dedicated bus lanes plus BRT, increased cycle-ways and encouraging walkability. The livability of communities and protection of the environment was a key outcome of the Plan.

*“Most of Sydney’s rail network was built more than 100 years ago and is primarily centred on servicing the CBD. There has been little recent expansion of the network, with 39 kilometres of the total CityRail system of 1,050 kilometres built in the past 33 years (as at 2012).. As Sydney has grown and evolved to a multi-centred city, its needs have changed and our rail system needs to evolve to keep up with these changes.”*

*“Businesses often cite the lack of public transport connectivity as an inhibitor to establishing a presence in the three regional cities of Parramatta, Penrith and Liverpool, as well as precincts like Macquarie Park, Sydney Olympic Park and Port Botany”.*

*“By enabling industries to set up in the regions, 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”.*

**The below comments – lifted from the Master Plan – succinctly encapsulate the rationale of this Plan:**

*“Regular physical activity is important to our health and wellbeing. Recent research shows that many people get an additional eight to 10 minutes of exercise each day when they use public transport. Importantly, being active for part of our journey to work or school incorporates exercise into our daily routines. The NSW Centre for Population Health has observed that public transport use, walking and cycling are associated with a number of health benefits, including a reduced incidence of obesity, higher levels of exercise and improved mental health.*

*Building social and community goals into our transport planning will strengthen communities, reduce disadvantage and open up opportunities. To meet our objective of reducing social disadvantage, we will require new ways of thinking about how to distribute transport services more evenly across the State. We will need to give people healthier travel options, such as making it easier and safer to cycle to work or walk to the nearest train station. We will also need to integrate our transport system more closely with land use planning, creating well-designed cities and suburban centres that reduce our reliance on cars, encourage us to be more active and produce safe, attractive and well-used urban spaces”.*

**The inclusion of the WestConnex project at various points throughout the document is an anomaly to the key rationale of the original document.**

**NSW Master Transport Plan Vision**

*“The city will become more liveable by improving the design of buildings and public areas, developing mixed-use spaces where people work and live, and creating more opportunities for people to walk and cycle to work and major service centres. Protecting our natural environment, improving access to green spaces and improving air quality will be critical. The Metropolitan Strategy for Sydney underpins this land use and planning vision for Metropolitan Sydney to 2031.*

*Central to these outcomes will be an integrated and efficient transport system that is closely aligned with land use planning. Sydney’s transport infrastructure and services will cater to the customer, providing diverse transport options and reduced travel times, while being readily accessible across all parts of the city. Improved public transport networks will increase productivity and global competitiveness.”*

**“Improve sustainability** – by maintaining and optimising the use of the transport network, easing congestion, growing the proportion of travel by sustainable modes such as public transport, walking and cycling, and becoming more energy efficient”

*“For public transport - If Under a ‘do nothing’ scenario, most travel in Sydney would continue to be by motor vehicle, with roughly the same percentage of trips still made by car in 2031.*

**“Transport has an important role in supporting Sydney as a global city. Strong connectivity across the city, quality public transport networks and opportunities for walking and cycling can all contribute to maintaining Sydney’s role as a centre of economic and social activity”.**

*“The city will become more liveable by improving the design of buildings and public areas, developing mixed-use spaces where people work and live, and creating more opportunities for people to walk and cycle to work and major service centres. Protecting our natural environment, improving access to green spaces and improving air quality will be critical.*

*“Central to these outcomes will be an integrated and efficient transport system that is closely aligned with land use planning. Sydney’s transport infrastructure and services will cater to the customer, providing diverse*

*transport options and reduced travel times, while being readily accessible across all parts of the city. **Improved public transport networks will increase productivity and global competitiveness***

*The Master Plan also goes on with the rationale “Currently, **around 14 percent of greenhouse gas (GHG) emissions produced in NSW come from the transport sector, making it the State’s second highest source of emissions. In the context of population growth and increasing travel demand, mitigating GHG emissions is a major challenge for the future**”.*

*“**Providing people with opportunities to use public transport instead of private vehicles** will help to reduce the environmental impact of transport in NSW. Increased walking and cycling, particularly for short, local trips, will also contribute to improved environmental outcomes.”*

*“The cost and availability of oil and the rising cost of electricity will also have a direct influence on the choices we make in procuring the most environmentally sustainable and energy efficient technologies to power our transport fleets”.*

*“The growing travel task is also a challenge for preserving the amenity of many of our communities. The movement of freight is rarely silent and the generation of noise on a shared network in proximity to residential areas is a recognised issue”.*

**The WestConnex project and its horrible impact on communities, vulnerable species and the environment is a complete juxtaposition to the vision for Sydney’s mobility by Gladys Berejiklian (previous Minister for Transport)**

There is a requirement for the EIS that the proponent’s proposal is consistent with all Sydney’s strategic planning instruments. Requiring this project to be consistent with all strategic planning instruments sounds reasonable until you realise that **all the plans were rewritten in 2012/2013 to place WestConnex at the center of their transport strategies.**

Up until 2012, metro strategy development in NSW was based on developing the broad strategy planning objectives and then discussing options to meet these strategic objectives before proposing individual projects/actions. Linking the M4 with the M5, as proposed by WestConnex, was never included as a project to realise previous Metropolitan Strategies.

Once WestConnex became the number one infrastructure project proposed by Infrastructure NSW, all strategic planning documents were rewritten to include WestConnex. In fact, it became the centerpiece of the transport strategy. This was after extensive community consultation was undertaken in February 2012 for the Long Term Transport Master Plan which did not include Westconnex.

At the time, Les Walinga, the then Director General of Transport, was on the Board of Infrastructure NSW and at the same time was developing the Long Term Transport Master Plan. When Infrastructure NSW proposed WestConnex as the major infrastructure project of its plan, **Les Walinga resigned from the Board citing conflict of interest as he was proposing public transport solutions in the Long Term Master Plan and was not supporting WestConnex.** Even within Infrastructure NSW there was doubt about the appropriateness of WestConnex.

Even allowing for the bastardisation of the planning process, this submission identifies areas where the **M4 East extension is inconsistent with the Metro Strategy.** These include:

- Does nothing to alleviate Western Sydney congestion
- Is an unsustainable solution as it will reach capacity by 2031
- Does not relieve traffic congestion on most downstream intersections

**I strongly object** to the WestConnex project, as it fails to match any of the required core outcomes of the NSW Travel Master Plan.

**I strongly object** to the WestConnex project as it represents a lost opportunity to “Get Sydney moving”. The funds required to fully implement the exciting public transport projects that will significantly improve connectivity of rail; bus, cycle and walking opportunities as proposed by Ms Berejilian will not be available. Instead, funds are redirected to a road project that is a space hungry, low volume mode of transport. It eschews Ms Berejiklian’s rational plan for Sydney, instead resulting in the perpetuation of car dependency, more pollution, more traffic noise, more congestion, and more GHG emissions. It reduces the livability and amenity of our suburbs. It removes important greenspace and vegetation that is critical for the survival of vulnerable species and for the health and wellbeing of residents.

**I strongly object** to the misrepresentation contained in the EIS that WestConnex was part of the NSW Transport Master Plan 2012. WestConnex was retrofitted in 2013, and was never a legitimate part of the long term plan scope.

### 3 The project fails to properly assess alternatives

To paraphrase a misattribution of Einstein ... the definition of insanity is to do the same thing over and over again, and expect a different result.

There clearly comes a point in time that more roads and widening roads won't solve the problem but are merely a temporary band aid. (Most other cities realised this decades ago).

As stated in the EIS, “*public transport options could be a feasible alternative if WestConnex was primarily about transporting people to and from centres*”. Considering that the WDA claims that it was front and centre of the NSW Transport Master Plan, I find this comment quite contradictory to the ethos and rationale contained in the aforesaid document – particularly version 2012.

The Secretary’s Environmental Assessment Requirements require an “analysis of feasible alternatives”.

As an example, demand management is dismissed as an alternative because it would “require major changes in social attitudes, travel behaviour and government policy”.

The first claim, that social attitudes must change, is dubious; social attitudes are already changing – road use per person is declining, and this is especially true amongst the young.

The second claim is simply wrong. Changes in travel behaviour are not a prerequisite for demand management; they are the result of demand management.

The third claim, that demand management is not an alternative because it is not currently government policy, is damning in its implication.

While changing government policy is not trivial, it is clearly possible; changing government policy is a feasible alternative. Should proper consideration of an option by the WDA lead to policy change being recommended, it is clearly possible that the government of the day can change government policy. To acknowledge that this option was dismissed on the grounds that it would require a change of government policy is strong evidence that the option was not considered on its merits, as is required by the SEARs.

#### 3.1 Sydney has underinvested in public transport over the past 30 years

In 1998 the NSW government released Action for Transport 2010 an integrated transport plan for Sydney. The plan proposed to:

“redress the [then] current imbalance in the road and public transport system.”

(Action for Transport 2010 an integrated transport plan for Sydney, 1998, NSW Government p.2)

The plan included a 10 Point Action Plan for Sydney:

1. Getting the best out of the Sydney system
2. Improving Sydney's air quality
3. Reducing car dependency
4. Meeting the needs of our growing suburbs
5. Getting more people on public transport
6. Safeguarding our environment
7. Making space for cyclists and walkers
8. Preventing accidents and saving lives
9. Making freight more competitive
10. Giving the community value for money

(p. 3)

The plan listed (at page 5) 21 projects to be completed or started by 2010 these were:

### **Rapid Bus Only Transitways**

#### **1. Liverpool to Parramatta (2003)**

2. Parramatta to Strathfield (2002)
3. St Marys to Penrith (Stage 1 2003) (Stage 2 2008)

#### **4. Parramatta to Blacktown (2004)**

5. Blacktown to Castle Hill (2009)
6. Blacktown to Wetherill Park (2006)
7. Parramatta to Mungerie Park (2010)

### **Heavy Rail**

#### **1. Airport Line (2000)**

2. Bondi Beach Railway (2002)
3. Parramatta Rail Link to Epping and Chatswood (2006)
4. Hornsby to Newcastle High Speed Rail (Stage 1 to Warnervale 2007) (Stage 2 to Newcastle work to start by 2010)

### **North West Rail Link Epping to Castle Hill (2010)**

1. North West Rail Link Epping to Castle Hill (2010)
2. Sutherland to Wollongong High Speed Rail (2010)
3. Hurstville to Strathfield Railway (To start by 2010 and be completed by 2014)
4. Liverpool Y Link (Work to start by 2010)

## **Light Rail**

### **16. To Lilyfield (2001)**

## **Road Improvements**

### **17. Eastern Distributor (2000)**

### **18. M5 East (2002)**

### **19. Cross City Tunnel (2004)**

### **20. M2 to Gore Hill (2004)**

### **21. Western Sydney Orbital (2007)**

All the projects in bold were built. It can be seen from the list that every road project was delivered. Of the 16 public transport projects only four were completed.

The inability for successive governments to deliver public transport projects has made Sydney (particularly western Sydney) more car dependent. Building more roads has not had any lasting impact on road congestion. The traffic projections in the current M4 East EIS show the tunnel at capacity by 2031.

“2031 AM peak and PM peak operational performances (in comparison to the ‘do minimum’ results) are detailed in Table 10.7 and Table 10.8 respectively.

High traffic densities are now recorded in the project’s mainline tunnel east of Concord Road, particularly westbound during the AM peak and eastbound in the PM peak where capacity is reached.”

*(M4 EIS M4 East EIS Volume 2A Appendix A-G, page 10-6)*

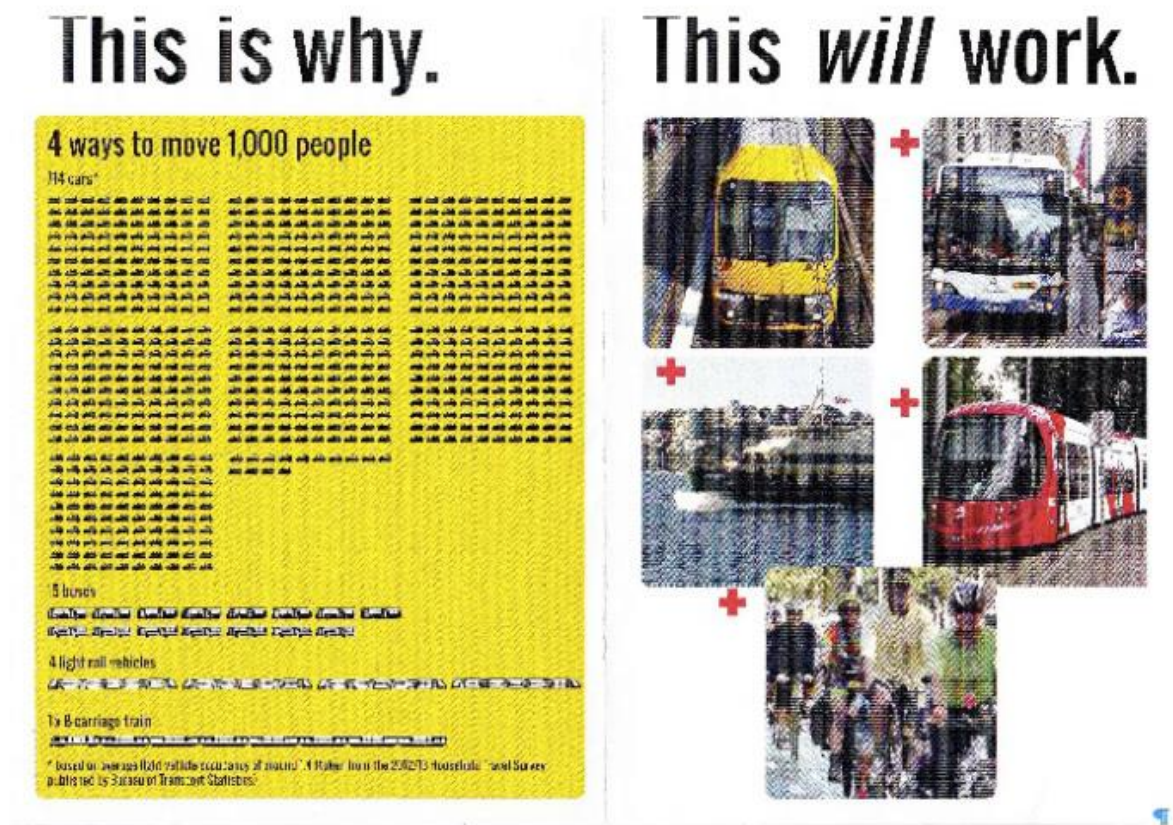
## **What is the plan post 2031? Building more roads will not solve traffic congestion in Sydney.**

WestConnex clearly fails to:

- Reduce car dependency
- Meet the needs of our growing suburbs
- Get more people on public transport

The Benefit-Cost analysis of WestConnex is evaluated over a 40 year period. Relieving traffic congestion on the corridor appears to be a major objective of the project. The project reaches capacity in the M4 East tunnel within eight years after project completion. This does not seem to be an

effective means of relieving congestion. The Cost-Benefit analysis should include costs of additional measures required over the **remaining 32 years of the project life** to maintain the claimed congestion and travel time savings. If included, it is likely that the **project costs will significantly outweigh any benefits.**



### 3.2 M4 East Past and Present

The M4 East was previously proposed in 2003/2004. The Sydney Motorways Project Office prepared a strategic environmental review of the WestConnex project in 2013. Chapter 4 of the review outlined the WestConnex scheme development and alternatives.

It is worth noting that this section covering alternatives to the then \$10.5 billion project was only four pages long out of a 127page document. The review gave a brief history of the M4 East proposal.

“The M4 Motorway between Emu Plains and Concord has been progressively developed over a 40 year period. The section between Parramatta and Concord was opened in 1992. An eastern extension of the M4 Motorway to the Sydney CBD was subsequently planned and a scheme was publicly exhibited in 2003 to 2004 which proposed extending the motorway to the City West Link and



widening the existing motorway. This scheme did not proceed due to concerns over economic viability and environmental impacts.” (p.25)

In the current M4 East EIS the following explanation is given:

“Between 2003 and 2004 a preferred option for an eastern extension of the M4 to the Sydney central business district (CBD) was developed and publicly exhibited. This option, referred to as the M4 East, proposed extending the M4 to the City West Link and Parramatta Road at Ashfield as well as widening the existing motorway between Homebush Bay Drive and Concord Road. This scheme was put on hold indefinitely by the then NSW Government. The 2003 preferred option formed the basis of the concept design for the M4 East project, which forms part of WestConnex.”

WestConnex M4 East Environmental Impact Statement, Volume 1A, WestConnex Delivery Authority, September 2015, Page 4-1

The two reports appear to contradict each other. It is quite a different proposition to a project being abandoned “due to concerns over economic viability and environmental impacts” and simply putting the project “on hold”. There is no analysis in the current EIS as to the reasons why the original proposal did not proceed. The comments in the Strategic Environmental Review should have been addressed in the EIS. What has changed since 2004 that now makes the M4 East economically viable with positive environmental impacts? The failure to release the business case further exacerbates the situation.

The project should not be approved without a full appraisal of the economic and environmental impacts of the proposal with particular reference to how the current proposal overcomes the previous concerns raised in 2004 that led to its abandonment.

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The project should not be approved without a full appraisal of the economic and environmental

impacts of the proposal with particular reference to how the current proposal overcomes the previous concerns raised in 2004 that led to its abandonment.

### 3.3 Reasons given for Westconnex M4 East don't stack up

“Parramatta Road is now one of the six most congested transport corridors in Sydney, with high travel demand and average travel speeds of private vehicles during the morning peak of about 30 kilometers an hour.” WestConnex M4 East EIS, Vol 1A, Page ii

The EIS does not say where Parramatta Road sits in the top six most congested roads in Sydney. Is it the worst or is it the sixth worst? If it is the sixth worst why is \$15.5 billion being spent on this corridor while the other five more congested corridors are not being given priority? There is no discussion in the EIS on the comparative advantages of spending the money on WestConnex as opposed to the other congested corridors.

“The Parramatta Road corridor is also one of Sydney’s busiest corridors for public transport. It has one of the highest number of bus passengers during the morning peak of any major bus route in Metropolitan Sydney.” M4 EIS vol 1A p.ii

Buses from the inner west carry around 10,000 passengers in the busiest hour into the city (as measured at Broadway). This includes the routes along Parramatta Road and King Street Newtown. However, in the study area, in particular Parramatta Road between Concord Road and Burwood Road there are no existing bus services. Between Burwood Road and Wattle Street, there is only one bus route the 461. This route has a peak frequency of 4 buses per hour. This gives a capacity of less than 250 passengers per hour. It is not a strong bus route due in part to its proximity to the main western rail line which accounts for most of the peak public transport demand on the corridor.

The EIS paints a false picture of public transport in the corridor. It suggests that there is already high public transport service and use on the corridor and that WestConnex will free up lanes on Parramatta Road for more and faster bus services. The implementation of bus lanes is stated to be the main public transport initiative of WestConnex. However, the project does not deliver bus lanes along the length of the Parramatta Road until after 2031.

*:The EIS mentions bus lanes as part of the benefits of the M4 East but they are **not** part of this project. They are not part of current NSW Transport plans and according to WDA would not be available at the time the tunnel would open in 2021.)*

WestConnex will have a net negative impact on public transport use. Refer to Part 3 on Congestion pricing for more information on why expansion of urban motorways has a negative impact on public transport.

## **4 Failure to meet the stated project objectives**

**I object to the Westconnex project in its entirety as the core objectives are not met.**

It is very obvious that the rationale used to ‘justify’ the project strongly indicates that WDA staff are scrambling to find any reason, no matter how flimsy, to support the objectives.

Here is the list of these core objective, for which each are discussed in detail.

- 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
- 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
- Create opportunities for urban revitalization, improved livability, and public and active transport (walking and cycling) improvements along and around Parramatta Road
- Enhance the productivity of commercial and freight generating land uses strategically located near transport infrastructure
- Enhance movements across the Parramatta Road corridor which are currently restricted
- Fit within the financial capacity of the State and Federal Governments, in partnership with the private sector
- Optimise user-pays contributions to support funding in a way that is affordable and equitable
- 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
- Protect natural and cultural resources and enhance the environment.

### **4.1 Support Sydney’s long-term economic growth with motorway access**

#### **4.1.1 Failure to meet this objective**

This section has not been adequately addressed on how it “supports 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”

#### 4.1.2 Who really Benefits from the WestConnex Motorway?

Given that **WestConnex provides a direct link to Sydney Airport** but not to the city or Port Botany (which is eight kilometres from WestConnex) who is the big winner out of this project?

I would suggest that MAp Airports Limited the then [owner of Sydney Airport](#) appears to be a major beneficiary. Since at least 2004, Sydney Airports has pushed in each of its Master Plans for improved links to the M4.

In 2011 the debate on a second Sydney airport was well advanced with the Federal Government considering a further proposal. If billions of taxpayers' money could be spent on improving road connections to the airport, this would cement Sydney Airport as the primary airport for Sydney for decades to come.

But how could an individual company influence the deliberations of Infrastructure NSW? One way may be to have the Chairman of Sydney Airport Holdings Max Moore-Wilton also as a Board member to Infrastructure NSW.

The only major attractor that is served by WestConnex is Sydney Airport. According to the WDA spin, among the benefits that WestConnex delivered included reducing the travel time from Parramatta to the airport by 40 minutes and bypassing up to 52 sets of traffic lights. They failed to say that you can now avoid the 52 traffic lights now in 2015 by catching the train which takes 45 minutes from Parramatta to the airport. According to google maps it takes between 39 and 54 minutes to drive between Parramatta and the airport. The claim of a 40 minute saving seems heroic.

The cover of the Strategic Environmental Review released by WDA in 2013 was a picture of the airport.

**I object to the WestConnex project in its entirety as the prime beneficiary appears to be Sydney Airport, and their car park. The people will not benefit.**



## **4.2 Relieve road congestion so as to improve the speed, reliability and safety of travel in the M4 corridor, including parallel arterial roads**

### **4.2.1 Failure to meet this objective**

Our road network will continue to deteriorate because of this project and the lost opportunity of investing in alternate transport modes that are better suited to the movement of people and freight from center to center. The many media announcements proclaiming to the public that this project will ‘bust congestion’ are deceiving and misleading

Roads are a low volume, space hungry mode of transport. They are an inefficient means to solve congestion problems. It is the quality of the available public transport that is the solution to relieving congestions.

A road lane can only transport 2,200 vehicles per hour. With peak hour single passenger vehicle average of 1.2 persons per vehicle, the best a road lane can transport is around 2,700 people per hour. This compares very poorly to the performance of a single train line that can on average move 20,000 to 30,000 people per hour. Modernising Sydney’s rail signalling would also contribute to a target movement of 50,000 people per hour.

#### 4.2.2 Traffic Analysis reveals congestion will remain

Keeping in mind that this EIS is meant to be a sales-pitch for the motorway. If the underwhelming traffic “improvements” are the best the WestConnex Delivery Authority can produce amongst its general obfuscation of the truth, I expect that the reality is likely to be far worse and certainly not worth spending \$15.4 billion on.

A close look at the numbers shows that **congestion is anticipated to get worse in many areas and traffic volumes on some sections of Parramatta Road are anticipated to be higher than if WestConnex was not built.**

The spin used by the WestConnex Delivery Authority to justify the projects is that while the motorways won’t generate any significant improvements, the next motorway that connects the M4 and M5, will. The predictions are that travel times will improve on most routes from around 6 to 8 minutes in the morning peak by 2021 to an earth shattering 10 to 12 by 2031 if the full \$15.4 billion WestConnex scheme is built.

With about eight different motorway projects under discussion in Sydney and an embarrassing recent history of legal proceedings over traffic predictions for tollways, coupled with little in the way of public transport for western Sydney, **the community can be easily forgiven for feeling this situation is getting ridiculous and out of control.**

The EIS traffic results don’t sit well with the claims from politicians that more motorway building will take traffic off local roads.

One of the reasons why traffic volumes will remain high on many sections of Parramatta Road and other local arterial roads is because the motorway will unleash another round of induced traffic growth and significant sections of the network are needed to act as feeder routes to the M4.

**When taken as a whole — traffic on the motorways and local arterial roads — the volumes are always higher with the motorways in place.**

#### 4.2.3 M4 Widening & traffic congestion.

The EIS states that by 2021 with minimal network changes at a point near Duck Creek, Parramatta Road will be carrying 43,990 vehicles on average per day, per year. With the M4 Widening it will carrying 59,370 — that’s 35 per cent more — because with a toll in place, some traffic will divert to using non-tolled roads. Victoria Road to the north is estimated to carry a daily average of 70,250 per day, per year with the M4 Widening instead of 60,440 — that’s 16 per cent more — also because of toll diversion. By 2031 with the full WestConnex scheme in place, volumes will rise to 62,490 for Parramatta Road and 75,770 for Victoria Road. If WestConnex isn’t built, the 2031 estimates are 52,030 for Parramatta Road and 68,250 for Victoria Road.

Results from the intersection analyses in the EISs aren’t much better. Using a traffic engineering standard that measures congestion on a scale from A to F, where F represents a breakdown in the flow of traffic so that queuing and extensive delays result, of the 29 intersections covered in the EIS for the M4 Widening (Church Street, Granville to Shaftesbury Road, Burwood), 15 will be operating at Level of Service F or experience a drop in service levels during the morning peak, 7 will be much the same, while Level of Service is estimated to improve on only 7. With the full WestConnex in place 16

intersections will be at Level of Service F or worse, 4 will be the same and 9 are anticipated to improve. The results are similar for the evening peak period.

#### 4.2.4 M4 East & traffic congestion

Moving on to the M4 East, at points along Parramatta, Liverpool, Punchbowl and Canterbury roads, the story is much the same. 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. By 2021, average weekday traffic on Parramatta Road would be just over 29,000 in the 'do minimum' case but 42,000 in the 'do something' case. For Liverpool, Punchbowl and Canterbury Roads, volumes stay pretty much where they are with no real improvements. For 2031, the estimated traffic volumes, are all higher or much the same, with the full WestConnex scheme in place with the exception of Liverpool Road which would see just 2,000 less vehicles on average on a weekday.

Results from the intersection analyses in the EISs closer to the city, an inspection of the numbers in the EIS for the M4 East for 2021 tells a similar story. Of the 39 intersections analysed (Homebush Bay Drive to Crystal Street), 14 are anticipated to be operating at Level of Service F or experience worse congestion, 11 will be much the same, while 14 are estimated to improve during the morning peak period. Results for the evening peak are similar. **With the full WestConnex scheme in place by 2031, 16 are anticipated to be operating at Level of Service F or experience worse congestion, 10** will be much the same and 15 are estimated to improve. Results are similar for the evening peak.

#### 4.2.5 Parramatta Road intersections would continue with extremely poor level of service

Frighteningly, of the total 68 intersections investigated along the stretch of Parramatta Road, **25 are anticipated to be operating at Level of Service F**. Add the 40,000 additional apartments that Urban Growth wants to build in the Parramatta Road corridor that have not been included in the traffic model and this number will increase so that conditions become even worse than the forlorn outcomes reported in the EISs

#### 4.2.6 King Georges Road M5 Interchange & increased congestion

A similar traffic forecast for KGR future performance estimates that peak hour travel times will increase by 50%.

Given that the content distributed to the community by WDA claims KGR will improve by 45% is outright misrepresentation. Located within the King Georges Road M5 Interchange these figures were retrieved.



Route on KGR		2014 (pg 91)	2017 (with upgrade) pg 99	2027 (with full project) pg 99
Northbound Stoney Cr Rd to Canterbury Rd	AM	9:09	10:44	10:53
	PM	8:04	9:25	10:14
Southbound Canterbury Rd to Stoney Cr Rd	AM	9:46	14:39	15:34
	PM	9:26	10:55	12:13

### 4.3 Flaws in the concept travel demands best met to a toll road

**There are major flaws in Westconnex EIS Traffic report, the analysis and application in the attempt to justify the Westconnex project. On this basis I object to the entire project.**

A fixed motorway will not address diverse travel plans, as you are relying on the local road network to absorb the induced traffic from the motorway.

#### 4.3.1 Traffic Modelling Flaws

Chapter 8 Traffic and transport and the associated appendix (Appendix G) are based on traffic modelling based on a three-stage system (see Appendix G, pp. 4-2 to 4-15):

- (1) traffic demand management;
- (2) rebase future year traffic demand; and
- (3) operational traffic modelling.

This summary examines the limitations of relying solely on traffic modelling findings, before assessing the assumptions made by WestConnex traffic modelling, examining a parallel report completed by SGS and concluding with a brief case of other traffic modelling for similar projects.

#### 4.3.2 Limitations of traffic modelling

Traffic Modelling has many limitations and therefore it is dangerous to rely solely on its findings.

In attempting to model the future, Traffic modelling makes a number of assumptions to produce what can sometimes seem like absolute and certain figures rather than estimates and the provision of one alternate outcome from many. So to rely solely on these findings can lead to misguided conclusions or outcomes, adding unnecessary risk to a project (Evans, Burke, & Dodson, 2007). This can be seen in recent Australian examples such as AECOM facing litigation over the traffic modelling of the CLEM7 tunnel in Brisbane, litigation over the traffic modelling for the Lane Cove Tunnel, and the Cross City Tunnel struggling to reach 20,000 automobiles per day after modelling suggested that 90,000 automobiles a day would use it (see <http://www.smh.com.au/federal-politics/political-opinion/the-forecast-was-not-good-or-even-accurate-20120929-26rzb.html>).

Indeed a reliance on traffic modelling as a justification for projects (as commonly happens in Australia) has seen ‘...investments in Melbourne’s urban road network [result] in more time being



used by Melbourne's motorists rather than less time' (Odgers, n.d., pp. 14-15), finding that from 2000-1 to 2006-7 overall speeds per hour on Melbourne freeways stayed generally the same, at around 78km/hour. Thus it is important to consider that 'Transport models are useful planning tools, but travel demand forecasting is not a precise science, and there are numerous outside factors which are difficult to predict or quantify' SGS (2015). Professor Michiel Bliemer and Dr Matthew Beck (both from the University of Sydney's Institute of Transport and Logistics) (Bliemer & Beck, 2015) state that models do not factor in future trends, preferences or behaviour (even trends that are known to be happening, such as 'millennials' driving less).

### **4.3.3 Some limitations of traffic modelling**

#### **4.3.3.1 Traffic modelling overlooks future trends**

Because 'a linear relationship is assumed between population, concentrations of land use and long-term transport demand' (Evans et al., 2007, p. 6), traffic modelling fails to consider future trends including (but not limited to):

- Changes in fuel prices and shortage (or perceived shortage) of fuel ('Most technical assessments of transport systems are naïve to the issue of petroleum risk' (Evans et al., 2007)):
- Changes in government policy (including transport and planning policy)
- The effect that emerging transport trends including decentralised and disruptive transport provision (such as Uber), car share (eg GoGet) and autonomous vehicles will have on car use
- Changes in generational travel preferences (such as 'Millennials' preferring technological connections over private vehicle connections; 'Boomers' driving less as this cohort ages)
- Changes in sociocultural trends (such as preference for particular destination types or avoidance of areas due to issues such as crime)

#### **4.3.3.2 Traffic modelling inadequately address effects of 'induced traffic'**

Traffic models also struggle to accurately address induced traffic, which 'weakens their capacity to inform policy makers about the broader economic value and environmental impact of major transport projects' (Evans et al., 2007, p. 6). Induced traffic can include:

- Mode change (such as switching from public transport to automobile use due to reduced travel time upon immediate opening of the road, known as the Downs-Thompson Paradox—see for example <http://io9.com/how-the-downs-thomson-paradox-will-ruin-your-commute-1152573927>)
- New trip
- Change of route
- Shift of times at which people travel
- As travel times are initially shortened by increased road capacity, people have more time in their travel budget (generally around one hour—see the Marchetti Constant for more on this) so may choose to make longer trips
- Changes in land use due to changes in accessibility to transport modes
- Reduced public transport services further increasing automobility of a city

‘The biggest force still driving the Auto City to build large freeways and accommodate the automobile rather than providing other options is the standard “black box” transportation/land use model... These are based on how a new or widened road will save time, reduce fuel, and lower emissions and road accidents... these benefits are illusory due primarily to “induced traffic.”’ (Newman & Kenworthy, 1999)

#### **4.3.3.3 Traffic modelling oversimplifies trip types**

Travel is ‘grossly simplified’ with minimal trip types considered (Evans et al., 2007, p. 4), for instance ‘trip-chaining’ (combining a number of destinations in one journey, such as dropping children at school before going to work, then picking the child up and going shopping) is ignored in modelling due to its complexity

Traffic modelling oversimplifies or limits considerations that lead people to choose trip or mode types

Residential density, land use mix and non-motorised accessibility all influence travel behaviour but are rarely accounted for (list adapted from Evans et al., 2007):

- ‘Australian metropolitan strategies... generally seek to reduce land use separation and distance, to promote walking, cycling, and public transport, and to reduce the use of the private motor vehicles. The use of models is unable to assess land use/transport interactions in order to determine and prioritise transport project investments within these strategies is therefore questionable.
- Trip zones considered are generally large, limiting consideration of walking or cycling
- Modal assignment is limited and overlooks many qualitative considerations of public transport services (such as youth preference to engage technology while travelling)
- Limited consideration of non-motorised trips and other travel options (such as car pooling)
- There is a focus on interchange and waiting times over quality of nodes or destinations (which affects the modes of transport people will take)

#### **4.3.3.4 Traffic modelling focusses predominantly on travel times at the expense of other considerations**

Models give limited consideration to effects such as pollution, noise or car emissions, while route/traffic assignment (Evans et al., 2007) assigns traffic flows to an equilibrium where no traveller can switch routes and reduce their costs which is not how the ‘real world’ works; capacities are generally over-simplified (for example heavy vehicle movements and highway geometry are often overlooked).

#### **4.3.3.5 Traffic modelling is generally ‘expert’-led and ‘technocentric’, with little community input or justification of assumptions and inputs**

Due to their technical nature, ‘knowledge of how the models work and their capacities, and in turn their biases and inadequacies, is often restricted to a small number of professional experts’ (Evans et al., 2007, p. 2). This can give traffic modelling reports the impression of ‘objectivity’ and ‘universality’, whereas the policy context and the political surroundings certainly play a role in the assumptions and inputs into such models, and when this is added to ‘the inherent inadequacies of transport modelling, this technical complexity may be seen to create a form of institutional risk for transport planning assessment’ (Evans et al., 2007, p. 2).

**Traffic modelling generally favours one mode—the car (Evans et al., 2007)**

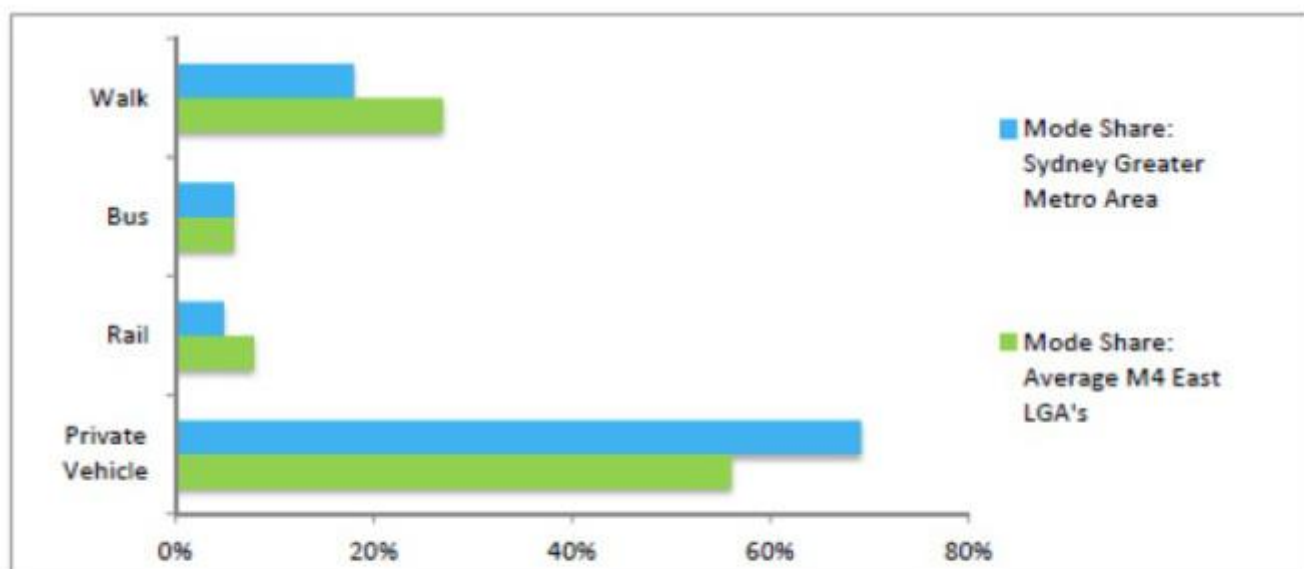
#### 4.3.4 M4 East traffic modelling—what are the assumptions?

##### 4.3.4.1 ‘Do nothing’ baseline is assumed

A ‘Do nothing’ approach is used as the baseline for any time-saving benefits of the M4 East and wider WestConnex project, however a more viable comparison might have been an incremental improvement of multiple modes of transport infrastructure (including for automobiles, buses, trains, light rail, walking and cycling) using the funding amounts for the M4 East and wider WestConnex project (\$15.4 billion). This could present an opportunity for increased viability of the traffic modelling, as previous suggestions by independent experts (see <http://www.reportageonline.com/2014/06/westconnex-motorway-not-actually-going-to-help-sydneys-traffic-congestion/>) for sustainable public transport as an alternative have been ‘overruled by WestConnex’, and the speed of a city’s roads are directly related to the speed of its public transport (known as the ‘Mogridge Conjecture’).

##### 4.3.4.2 An auto-dependent study area is assumed

The study area—defined as the Local Government Areas in the project—is assumed in the report to be auto-dependent and reliant predominantly on cars for transport. However Newman and Kenworthy (2015) outline the fact that a suitable aspirational target for total trips taken by automobile might be 75% in an ‘automobile fabric’ area. Table 5.7 (Appendix G, p. 5-8) however shows that the average weekday travel for all local government areas within the project area is 57%, far lower than both the Greater Metropolitan Area of Sydney (67%) and the threshold for Newman and Kenworthy’s ‘automobile fabric’. It is a figure that is closer to a ‘transit fabric’ of 50% overall car use (see also Figure 5.4 from Appendix G, below). Along with the fact that 90% of western Sydney commuters to the CBD travel every day by public transport (SGS, 2015), this brings into question the modelling assumptions that cars are the preferred form of transport and that they will remain so to the modelling horizon (2031).



**Figure 5.4** Travel mode share comparison between study area average and Sydney GMA (Source: NSW Bureau of Transport Statistics, Household Travel Survey Report: Sydney 2012/13, November 2014 release)

(Appendix G (p. 5-8) itself states: ‘Findings from the HTS [household travel surveys] shows that on average, 57 per cent of trips on a typical weekday in the project area are car based compared to 69 per cent in the Sydney GMA. The lower proportion of residents who are dependent on car travel can be partly attributed to good public transport options in the project area and also to the proximity of activities with a high proportion of travel utilising the walk mode share in comparison to LGAs with a more dispersed land use.’)

#### ***4.3.4.3 Current trends such as ‘peak automobile’ are ignored; outdated status quo is assumed***

As outlined above, traffic models struggle to deal with future trends and patterns. However even current trends such as peak car (Newman & Kenworthy, 2015), which began in 2004 and is the decrease in the growth in overall car use, are ignored in the modelling. Ignoring trends towards peak automobile and shifts away from automobile dependence, as well as societal changes (such as an ageing population in Sydney and reduced reliance on cars by younger generations) and potential future technological developments (such as car share systems and autonomous vehicles), adds risk to the modelling assumptions and significantly reduces their reliability.

#### ***4.3.4.4 A certain level (2-7%) of induced traffic is assumed***

‘At the extremes of the project a slight increase in volumes is shown on Parramatta Road, Concord Road and City West Link. This is indicative of the induced traffic demand attracted to the corridor as a result of the project...To the west, Concord Road and Parramatta Road continue to show an increase in expected daily volumes reflecting the induced demand resulting from the attraction to drivers of the WestConnex scheme.’ (Appendix G, p. 8-2)

‘Induced travel demand increases 2031 future year traffic volumes using WestConnex between two per cent and seven per cent, with the specific value varying across different sections of the project.’ (Appendix G, p. 4-6)

Yet the uncertainty regarding the actual amount of induced traffic and its effects on project aims (such as ‘Relieve road congestion’ and ‘Create opportunities for urban revitalisation...along Parramatta Road’), its impact on the local study area and its implications in the context of Greater Metropolitan Sydney area are not addressed.

#### ***4.3.4.5 The effect of induced traffic demand on public transport usage is not acknowledged***

Despite claims that improved public transport (such as bus) travel times will improve patronage (Chapter 8, p. 32), the effects of induced traffic (such as switches away from public transport to cars) on alternative modes are ignored. Concerns regarding increasing the demand for automobile use when the majority of developed cities around the world and most strategic directions and plans for Sydney point towards reducing automobile demand are also overlooked.

The other component of induced demand overlooked in transport models is changes in residential/work location choice. New/expanded freeways encourage people to move further from work, knowing that they can do so and still keep their daily commute time within their travel budget.

The resulting sprawl has huge economic, environmental and social costs which are not included in a business case or EIS.

The cumulative impact of urban-motorway induced sprawl over the last half century is that Australian cities now spend 13% of GDP on transport, compared to only 8% in European cities.

#### ***4.3.4.6 SGS traffic modelling report is ignored***

A traffic modelling report conducted by SGS Economics and Planning (SGS, 2015) relating to the entire WestConnex project produces numerous counterpoints to the modelling conducted for the M4 East project and given in the EIS. This report is ignored throughout the M4 East report, despite the opportunity to strengthen both models by comparing and contrasting outcomes, and identifying differences in assumptions that led to any disparities (some select findings from the report are outlined below).

#### **4.3.5 Brief findings from the SGS traffic modelling report**

As a counterpoint to the modelling used for the EIS, this section will briefly outline the main points made by the SGS report that was conducted into the wider WestConnex project (available at <http://www.sydney.org.au/sgs-economics-and-planning-westconnex-transport-modelling-summary-report/>).

At best the disparity in the two projections proves the difficulty in accurately predicting future transport movements across a complex network in a city such as Sydney and confirms the above points warning against sole reliance on traffic modelling for project justification. At worst they present a bleak view of the effectiveness the WestConnex project will have, and bring the validity of the modelling used and thus the justification for the entire project into question. Briefly, the SGS report found that:

‘Sydney traffic congestion will worsen with or without WestConnex, with the project only making a minor difference to Sydney’s overall traffic in the future...The net effect [of the entire WestConnex project] is similar to the status quo.’ (SGS, 2015, p. 1) (see below)



A map showing which areas stand to win (green circles) and lose (red) according to the City of Sydney.

(see <http://www.smh.com.au/nsw/parramatta-road-traffic-will-increase-under-westconnex-study-shows-20150427-1mueqm.html>)

‘The [SGS] modelling confirms that WestConnex will not improve access to the Sydney CBD...the CBD is already congested and has little available parking.’ (SGS, 2015, p. 4)

‘Traffic flows on Parramatta Road will increase by up to 22 per cent (between Homebush Bay Drive and Concord Road) as vehicles avoid paying the toll on the M4 and M4 eastern extension. This finding is consistent with the WestConnex Delivery Authority’s own assessment presented in the M4 Widening Environmental Impact Statement and with the traffic flow impacts observed when the M4 toll was removed in 2010. As a result of WestConnex, Parramatta Road will take more traffic in the future, not less.’ (SGS, 2015, p. 15)

‘Traffic growth on Parramatta Road will clearly jeopardise the government’s planned urban renewal and population growth along this corridor.’ (SGS, 2015, p. 4)

#### 4.3.6 Issues with modelling of other comparable projects

In recent years, traffic modelling of other similar projects has been called into question on a number of occasions, and serves as a warning against relying solely on traffic modelling as justification for road projects into the future. For instance:

- The Cross City Tunnel (Sydney) became insolvent in 2006 as a result of significant traffic modelling discrepancies—90,000 cars/day were predicted through the model, though just over 20,000 cars /day actually used the tunnel (see <http://www.smh.com.au/federal-politics/political-opinion/the-forecast-was-not-good-or-even-accurate-20120929-26rzb.html>)
- The two companies responsible for the Lane Cove Tunnel (Sydney) traffic modelling were subject to litigation after the tunnel became bankrupt directly following its 2009 completion due to



actual use less than half that projected in the modelling (see <http://www.smh.com.au/nsw/trial-to-start-on-144-million-lane-cove-tunnel-debacle-20140809-102c6d.html>)

AECOM (who conducted the M4-East traffic modelling) faced litigation over the modelling of the Clem7 tolled tunnel in Brisbane. Central to the claim was the fact that AECOM provided traffic models showing 100,000+ cars /day usage by 2011, despite having 18 months earlier estimated usage would be 57,000 cars /day. Actual traffic usage numbers in 2011 were under 24,000 cars/day (see <http://www.smh.com.au/business/backers-sue-on-tollroad-forecast-use-20110414-1dfxd.html>).

#### **4.4 Create opportunities for urban revitalization, improved livability, and public and active transport (walking and cycling) improvements along and around Parramatta Road**

##### **4.4.1 Failure to meet this objective**

‘Traffic growth on Parramatta Road will clearly jeopardise the government’s planned urban renewal and population growth along this corridor.’ (SGS, 2015, p. 4)

The uncertainty regarding the actual amount of induced traffic and its effects on project aims (such as ‘Relieve road congestion’ and ‘Create opportunities for urban revitalisation...along Parramatta Road’), its impact on the local study area and its implications in the context of Greater Metropolitan Sydney area are not addressed by the EIS.

Another contribution was the pointed discussion by Tim Williams, the chief executive of the Committee for Sydney, an advocacy group whose members include engineering and finance firms that would typically be on the hunt for work from a multibillion-dollar toll-road.

Dr Williams used a presentation at the University of Sydney to advocate fiercely for a more ambitious public transport agenda, arguing governments needed to help transform Sydney into a city that relied less on the car, while also lambasting the refusal of motorway authorities to release information about their projects.

In Dr Williams' telling, other global cities have realised merely adding new roads does not solve the problem of congestion, nor do new motorways of themselves create a more productive or liveable city.

"Many other cities in the world are taking their highway capacity out and I'm just wondering, what is so different about the Australian city experience that means that they're wrong and we are right?" Dr Williams asked.

"We think this is a congestion-busting proposition and nowhere in Christendom does that appear to be the case – so what's going on?"

The issue is the future of the city, and the question of whether the \$15 billion WestConnex is the right thing to add to it. And the government should not be allowed to bluff its way through. Too many reputable voices – from academia, from business, from an increasingly informed public – are challenging the idea that new motorways radiating into and out of congested inner suburbs is the right transport strategy for the city.

<http://www.smh.com.au/comment/smh-editorial/more-debate-on-15-billion-westconnex-initiative-welcomed-20150503-1myvdb.html#ixzz3op21KKec>

## 4.5 Enhance the productivity of commercial and freight generating land uses strategically located near transport infrastructure

### 4.5.1 Failure to meet this objective

Freight benefits are an integral part of the justification for WestConnex. It should be noted that when WestConnex was first reviewed by Infrastructure Australia it was classified as a freight project. However, there is no analysis of the current freight movements in the corridor or any discussion of alternative options for freight. This is a major weakness of the EIS. **WestConnex should not be approved until the community has had an opportunity to see and review all the freight claims and impacts**

As detailed in the below section, with the majority of Sydney's the population located in the Greater West it makes better sense to transport the bulk of freight via rail, such as the utilisation of the planned new distribution center planned for St Mary's.

### 4.5.2 Freight by rail projects by private sector

According to a recent SMH article alternate investments are being made to move freight more efficiently and cheaply by rail from Port Botany.

A recent announcement by Asciano aims to have a second freight hub transporting containers by rail to Port Botany within 12 months, as it prepares to spend \$100 million building a new intermodal terminal in western Sydney. This new 43-hectare hub, will be located in St Marys which is claimed as an ideal location for big retailers such as Woolworths, Coles and Bunnings, which have distribution centres nearby. It will be Asciano's second intermodal terminal in western Sydney after Chullora. The Chullora terminal started transporting containers on rail to the port two months ago.

The new hub's rail shuttle will have annual capacity of 300,000, 20-foot equivalent units (TEUs) annually. Chullora has annual capacity of 600,000 TEUs, including up to 135,000 TEUs that can run on rail to Port Botany. Chullora is running some 75,000 TEUs annually on rail to Port Botany.

At full capacity, moving freight from Port Botany by rail from Chullora could take up to 100,000 truck journeys off roads every year, according to Asciano chief executive John Mullen.

A much-bigger competing freight terminal will be opened at Moorebank by logistics group Qube and rival rail group Aurizon in late 2017.

The distribution centres at both Chullora and Moorebank are better suited for distributions in the inner west. Mr Mullen stated that with "most of the distribution centre activity is further north-west" then it makes sense to transport via a cheaper and more efficient rail mode.

The WestConnex project will perpetuate an inadequate, antiquated and highly congested transport route that will not meet the needs of the freight transport industry and the people of Sydney and NSW. The Freight Industry recognises this, and have embarked on their rail projects that will better support



Sydney's global economic corridor. Why does this Government and the RMS not recognise 21<sup>st</sup> century solutions to our congestion problem?

: <http://www.smh.com.au/business/asciano-spends-100m-on-expanding-sydney-freight-hub-network-20151008-gk44qp.html#ixzz3oFxu8ITj>

#### 4.5.3 NSW Government has failed in aim to increase freight by rail

The NSW government has failed in its aim of moving an increasing proportion of freight throughout Sydney on rail, leading to more heavy trucks on the road. This outcome, which Roads and Freight Minister Duncan Gay concedes is a "slight embarrassment", comes amid rapid growth in the volume of goods and commodities being moved through Sydney's container port at Botany.

The state Coalition government wants to lift the share of containers moved through the port from 14 per cent to 28 per cent by the start of the next decade. This is a downgrade from the former government's target of 40 per cent, which it never got close to meeting. But over the life of the O'Farrell and Baird governments, the rail share of containers has remained stuck at about 14 per cent. Asked about the failure to lift the share at budget estimates about the failure to lift the share, Mr Gay said: "We believe we will do it, but we are a long way off at the moment."

**Mr Gay attributed the failure to move a larger share of goods by rail to improvements in truck access to the port, which started under a program set up by former ports minister Joe Tripodi.**

"It is success in one area that has stopped progress in another," Mr Gay said.

The executive general manager of NSW Ports for planning and infrastructure at NSW Ports, Marika Calfas, attributes the number of trucks due to the lack of terminals to transport containers by rail, and to a lack of regulation. "We need the facilities out there to increase capacity," Ms Calfas said. "We need to be able to take the boxes somewhere."

#### 4.5.4 Decades of underinvestment in freight rail

Tony Abbott - in his 2009 book *Battlelines*, the "humblest person is king in his own car". He went on to dismiss outright the practicality of public transport in Australia's sprawling cities: "Mostly, there just aren't enough people wanting to go from a particular place to a particular destination at a particular time to justify any vehicle larger than a car, and cars need roads."

Despite this assertion, the new Sydney motorways partly funded by the Road-focussed Abbott government are being built in the most densely settled parts of Sydney. The NorthConnex and WestConnex involve building very long tunnels. All are likely to ignore the safety recommendations from the coronial inquest by Judge Jennifer Coate into the three-truck pile-up inside Melbourne's Burnley tunnel in 2007. Between them, the projects involve more than 23 kilometres of new tunnels. Coate urged governments to build tunnels with dedicated emergency lanes and to eliminate the need for lane-changing, but the NSW government has shown that such features won't be included.

The relentless rise of heavy vehicles in Australia's transport system over the past four decades has occurred in part because Australia has no proper charging system, and because

governments have starved the publicly owned rail-freight system of investment. As a result, rail's share in moving the goods that Australians buy every day has steadily declined, while the volume of road freight has increased almost tenfold over the past 40 years, to 203 billion tonne kilometres.

This development is in marked contrast with the situation in the United States. The US still moves about 40% of its intercity freight via rail. The US rail system is one of the most efficient in the world, and it is also profitable. It's such a good business that the shrewd investor Warren Buffett recently sank \$US26.5 billion into buying a rail company.

Australia's shift to the roads has locked us into a freight system that is inherently more costly, more carbon intensive and more dangerous. Figures published by the federal government's Bureau of Infrastructure, Transport and Regional Economics (BITRE) show that the cost of moving 1 tonne of freight by road over a distance of 1 kilometre (known as cost per tonne kilometre) is 7.5 cents for road, more than double the 3.5 cents for rail. The greenhouse-gas emissions for road are more than triple those for rail: 52 grams per tonne kilometre versus 15.

This road-dependent freight system also means that Australia's cost of living is much more exposed to oil price rises. The carbon-intensive nature of the system makes it vulnerable to any future moves to introduce international trading systems or other regulations for greenhouse emissions.

There's also road dependency's cost to human life. In the five years to 2011, the average number of fatalities from Australian road accidents that involved a truck of more than 4.5 tonnes was 239 a year. The comparable number for rail, including passenger trains, was 34 deaths a year, which is remarkably low given that rail moves greater tonnage than road when bulk commodities such as minerals and grain are included. This means that trucks cause around 20% of all road fatalities in Australia even though they make up only 2.5% of the vehicles on the road. The number of people injured in such accidents continues to rise. In 2008–09, the latest year for which injury data is available, 1536 people were hospitalised after accidents with trucks. Accident victims classified as suffering a "high threat to life" totalled 551 in 2008–09, an increase of 18% in eight years, according to a 2014 BITRE report.

BITRE predicts a further 50% rise in the number of trucks on our roads over the next 15 years. Despite the urgent need for policy action, the wheels of government are moving slowly.

Two key reforms would give Australia a less costly, less dangerous and more climate-friendly freight system, and they are related. The first is distance-based charging for heavy vehicles, and the second is the construction of an inland rail line between Melbourne and Brisbane, which would avoid Sydney's notorious congestion and the 19<sup>th</sup>-century coastal rail line.

Trucking has become so dominant that even the trucking companies are saying that it's in their interest to shift more freight onto rail. Fox and his company executives declined to answer a series of questions put to them, and Abbott would not comment on his relationship with Fox. But back in 2009, Fox broke ranks with the industry, and the Abbott view, and said Australia had to shift back to rail if it were to have a viable freight system.

"I'm talking against myself when I'm talking about putting things on rail," Fox told a forum at the National Press Club. Fox backed the inland rail line, but he also advocated making greater use of coastal shipping, transferring more of Sydney's trade activity to Newcastle or Wollongong, and shifting Melbourne's major port to Hastings on the Mornington Peninsula. In the early '70s, about one-third of the freight moved between Victoria and Queensland went by sea, but that has now fallen to nil. He said Australia could learn a great deal from China, which has built deep-water ports away from major cities. "We do need to move away from running transport operations in the centre of the city, particularly on the east coast of Australia."

Fox expressed what might be the vain hope that he would see **sensible reform** happen in his lifetime: "We're only here for a short time. I've got probably less than ten years to go. I'd certainly like to see some of these things that are in the **interests of the nation.**"

Without the NSW Government investing in the right infrastructure, ie to invest in a more efficient movement of freight around our state and country – instead of the antiquated and polluting motorways, our country will continue to decline in profitability.

<http://www.smh.com.au/nsw/more-trucks-on-sydney-roads-as-government-fails-to-hit-rail-share-targets-20140921-10jyab.html#ixzz3pDnELmvV>

<https://www.themonthly.com.au/issue/2014/december/1417352400/paul-cleary/roads-nowhere>

## **4.6 Enhance movements across the Parramatta Road corridor which are currently restricted**

### **4.6.1 Failure to meet this objective**

'Sydney traffic congestion will worsen with or without WestConnex, with the project only making a minor difference to Sydney's overall traffic in the future...The net effect [of the entire WestConnex project] is similar to the status quo.' (SGS, 2015, p. 1)

'Traffic growth on Parramatta Road will clearly jeopardise the government's planned urban renewal and population growth along this corridor.' (SGS, 2015, p. 4)

The uncertainty regarding the actual amount of induced traffic and its effects on project aims (such as 'Relieve road congestion' and 'Create opportunities for urban revitalisation...along Parramatta Road'), its impact on the local study area and its implications in the context of Greater Metropolitan Sydney area have not addressed by the EIS.

## 4.7 Fit within the financial capacity of the State and Federal Governments, in partnership with the private sector

### 4.7.1 Failure to meet this objective

The WestConnex motorway is the wrong transport project for Sydney's future, a report commissioned by City of Sydney Council says.

The report argues the WestConnex motorway is unlikely to reduce traffic on local roads, exposes the taxpayer to huge financial risk, and will not benefit many western Sydney commuters. Journey-to-work figures analysed by SGS show only about four per cent of workers in suburbs such as Penrith, St Marys and Camden travel to the CBD. Moreover, about 90 per cent of these work trips to the CBD from the west are using public transport.

SGS's report also says "WestConnex shares characteristics with other motorways that have financially failed, such as the Lane Cove Tunnel, Cross City Tunnel and Clem 7 in Brisbane, exposing the taxpayer to risk".

Principal of SGS Terry Rawnsley said a metro rail line along Parramatta Road between Westmead and Central would be a better fit for the city than a new motorway.

"It's the biggest transport project in Sydney's history and you want to be sure it is going to be an economically viable project. There's a lot of questions that someone needs to answer."

<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#ixzz3ooycRRIG>

I consider that the provisions of public/private partnership agreements for urban motorways should be made public and that such agreements must not contain penalty provisions for compensation payments to a motorway operator if a public transport system competes effectively with the motorway

The EIS does not include the business case. Until the business case is released, and independently verified, it can only be assumed that the project does not fit within the financial capacity of the State and Federal Governments. It has already been made clear that the private sector will not be funding this project, precisely because of concerns about its viability.

**I reject the entire WestConnex project on the basis that the expected cost benefit ratio is less than the dollar and thus a waste of our NSW taxes.**

### 4.7.2 Reasons given for Westconnex M4 East don't stack up

"Parramatta Road is now one of the six most congested transport corridors in Sydney, with high travel demand and average travel speeds of private vehicles during the morning peak of about 30 kilometers an hour." WestConnex M4 East EIS, Vol 1A, Page ii

The EIS does not say where Parramatta Road sits in the top six most congested roads in Sydney. Is it the worst or is it the sixth worst? If it is the sixth worst why is \$15.5 billion being spent on this corridor while the other five more congested corridors are not being given priority? There is no discussion in the EIS on the comparative advantages of spending the money on WestConnex as opposed to the other congested corridors.

“The Parramatta Road corridor is also one of Sydney’s busiest corridors for public transport. It has one of the highest number of bus passengers during the morning peak of any major bus route in Metropolitan Sydney.” M4 EIS vol 1A p.ii

Buses from the inner west carry around 10,000 passengers in the busiest hour into the city (as measured at Broadway). This includes the routes along Parramatta Road and King Street Newtown. However, in the study area, in particular Parramatta Road between Concord Road and Burwood Road there are no existing bus services. Between Burwood Road and Wattle Street, there is only one bus route the 461. This route has a peak frequency of 4 buses per hour. This gives a capacity of less than 250 passengers per hour. It is not a strong bus route due in part to its proximity to the main western rail line which accounts for most of the peak public transport demand on the corridor.

The EIS paints a false picture of public transport in the corridor. It suggests that there is already high public transport service and use on the corridor and that WestConnex will free up lanes on Parramatta Road for more and faster bus services. The implementation of bus lanes is stated to be the main public transport initiative of WestConnex. However, the project does not deliver bus lanes along the length of the Parramatta Road until after 2031.

*:The EIS mentions bus lanes as part of the benefits of the M4 East but they are **not** part of this project. They are not part of current NSW Transport plans and according to WDA would not be available at the time the tunnel would open in 2021.)*

**WestConnex will have a net negative impact on public transport use. Refer to Part 3 on Congestion pricing for more information on why expansion of urban motorways has a negative impact on public transport. I therefore object to this project in its entirety**

## **4.8 Optimise user-pays contributions to support funding in a way that is affordable and equitable**

### **4.8.1 Failure to meet this objective**

WestConnex perpetuates car dependency.

I certainly do not have an issue with tolls or congestion taxes – but you must have a decent integrated public transport solution available first. Initiatives contained in the NSW Transport Master Plan (ignoring the retrofitted and contradictory westconnex) and Eco Transit Sydney would have enlivened the ability for people to get from A to B without via Central. Recent examples of the popularity of public transport – Gold Coast Tram. Green Square & Mascott stations once fares were reduced to standard.

WestConnex means that families in the West will need to find \$100 - \$200 per week to travel to work. Yet I – with public transport & Opal – pays \$33.60 per week giving me free travel 3 days per week.

This is inequitable. Greater Sydney will continue to be in congestion – but now have to pay.

**On this basis, I reject the entire WestConnex project in its entirety as it does not meet the objective of fair and reasonable access to transport for Greater Sydney.**

## **4.9 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**

### **4.9.1 Failure to meet this objective**

There are large sections in our community that will endure up to 10 years of construction (destruction) in their community with 24/7 activity.

The EIS provides no mitigation or solution (apart from counselling).

10 years is a significant impact on a highly populated sections of the populace and should have been given greater weight for reasons not to proceed with WestConnex.

SouthConnex (F6) will entail its own additional significant impacts on the community and environment, particularly at Arncliffe and the Rockdale wetlands.

Refer to the various sections relating to case studies of peoples impact and the environment impact to flora and fauna.

**The lack of any evidence contained in the EIS on how this objective can be met, but anecdotal evidence proving otherwise, I therefore reject the WestConnex project in its entirety. This is a highly destructive and intrusive project for near one million people. That is not a ‘few cracked eggs’**

## **4.10 Protect natural and cultural resources and enhance the environment.**

### **4.10.1 The WestConnex project does not meet this core objective**

Features of the M4 East project include: Widening roads; unfiltered exhaust stacks close to homes, schools and aged care centres; destruction of trees; temporary and permanent loss of greenspace; induced traffic onto local roads; impact on wetlands, groundwater and endangered species; exposing residents to prolonged high impact acute noise 24/7; hundreds of significant truck movements a day impacting on the safety of residents particularly primary school children; isolation; community dislocation; car dependence.

None of these factors enhance the environment. In fact, this proposal has a very significant negative impact on the urban and natural environment where over a quarter of a million people live and 64,000 work in the M4 section. It will remove valuable cultural resources including heritage buildings.

#### 4.10.2 Sectional planning approach

I **object** to the sectional planning project approach to the 33 kilometre Westconnex motorway. This prevents serious consideration of the impacts of the larger Westconnex project. **While broad justifications for the whole project are used to justify local threats, there has been no overall analysis and evaluation of the environment threats from the whole project.**

This submission endeavours to take an **holistic approach** to the project and refers to both the M4 and M5.

#### 4.10.3 Social Impacts

Significant impacts on residents and businesses

##### 4.10.3.1 Home acquisitions

The stated recommended mitigations in Appendix M is contradicted by actual outcomes. Home Owners (reported in the media) claim that lower than market value is offered for their homes and that they are bullied by RMS staff. Longstanding communities members are being forced to move far from their social networks.

Renters are also having to seek legal advice for relocation compensation. One long term renter in the same home for 18 years was only offered \$5000 to relocate.

The disadvantaged residents in social housing (including independent homes for people with special needs) of RMS property have not had their needs addressed in the rush to evict hundreds of people from their homes.

Most of these people forced from their homes will likely find they have to move some distance away from where they have established support networks. This would be particularly hard on the frail and elderly.

I object to the mitigation of offer of 'counselling' which even if it does exist (and some say it has not been offered to them) would be of little assistance.

#### ***4.10.3.2 Impacts on social facilities***

In the area impacted by the project, there are:

- 8 aged care and nursing homes
- 5 primary schools, 3 high schools and 3 kindergarten to Yr 12
- 5 childcare centres and one tertiary education provider
- A number of sports and recreation facilities
- Religious services a
- Shopping centres

I object to the 'mitigation' for organisations that will be left near the tollway construction site ( such as the Willows Private Nursing Home and Peek-a-boo Child Care Centre) described as "consultation for 'relief periods' from 24 / 7 construction (destruction) if "feasible and reasonable". This proposal is shallow and unacceptable.

**This is an inhumane approach towards the most vulnerable in our society.**



Students from Haberfield Primary School protesting on the pedestrian bridge after school

#### ***4.10.3.3 Amenity Mitigation***

This project will have a high impact on thousands of people. Noise 24/7 for three years, loss of visual outlook, and views of construction (destruction) compounds should not be trivialised. This is a prolonged construction period.



I object to the suggestion that decorating hoardings and some temporary plantings around the compounds is 'mitigation'.

#### **4.10.3.4 Sports fields**

Locals and visiting teams will be playing active sport within an environment of elevated pollution. Emissions from modern vehicles contains fine particulate matter that can penetrate the cells of lungs. See Air Quality section.

**I object to a project that places the health of the community at risk.**

#### **4.10.3.5 Unsafe Removal of Asbestos.**

This dangerous substance has been located in several locations across the Westconnex project already. There is evidence that trucks removing asbestos have not been following appropriate safety standards such as sprinkler systems, washing down trucks before departure, and neglecting to properly cover loads.

I object to the contempt Westconnex has shown for the health and safety of residents within the locations and on route to Erskine Park where soil contaminated with asbestos has been dumped without being wetted or properly covered at the time of disposal.

#### **4.10.3.6 Divisive Infrastructure**

I object to a 'solution' that results in a dreadful outcome on the amenity for all impacted suburbs. A wide, dirty and noisy toll road and the spaghetti interchanges thrust through suburbs that form part of Australia's 19th and 20th century history including the destruction of heritage listed homes and historic buildings.

#### **4.10.3.7 Mental Health**

The stress imposed on people by the Westconnex will increase the likelihood of anxiety and depression. The grief people will experience watching the suburb and urban landscape they love permanently destroyed has not been sufficiently addressed in the EIS social impact statement.

The permanent impact of this toll road on thousands of people's physical and mental health through

- visually divisive spaghetti interchanges
- noise barriers -that we know little care to landscaping for residents will be addressed –ref M5 KGR landscape design aka bare noise walls
- prominent and unfiltered exhaust stacks a constant reminder that residents and workers and their families are being poisoned by high levels of pollution
- loss of accessibility by pedestrians and cyclists

- impacts on the elderly for mobility, safety, connectivity and isolation
- impacts to the community and schools with the loss of neighbours
- impacts on the significant number of people forced to leave their home and community – loss of social networks and loss of school mates.
- stress and anxiety brought on by living in a permanent high noise and highly polluted environment.

#### **4.10.3.8 Cumulative Impacts**

Claims of reduced traffic on Parramatta road and improving amenity are unsubstantiated. The traffic congestion on the Parramatta road corridor will not improve (source your EIS). With a better solution to mass transport people (public transport) not addressed and increasing population, Parramatta Road will remain congested.

#### **4.10.3.9 Impact on businesses**

There are approximately 600 permanent jobs that will disappear due to this project due to property acquisitions at Haberfield alone. Remaining businesses, including aged care and child care centres, are likely to fail or suffer significant loss of trade. Suggestions that the patronage of construction workers will augment the local economy seem to be clutching at straws to find a solution here.

We have recently learned that quite a number of businesses at Gareema Ct Kingsgrove will also be acquired. As part of the M5 East section.

#### **4.10.3.10 Social Infrastructure**

Stated mitigation - Landscaping treatments for the benefit of residents. Let's revisit the landscape design of the King Georges Road Interchange – hundreds of metres of bare noise walls because it is easier for the maintenance crew to inspect. Never mind the residents or professional pride or genuine appreciation for the huge disruption caused to residents. Ugly bare walls.

**I object to the likely outcome facing residents of the landscaping treatments being a typical, visually divisive structure.**

#### **4.10.3.11 Loss of vegetation**

I object to the loss of any vegetation planted as part of the rehabilitation/landscaping works following the construction of the M4 motorway. I have often been forced to travel on the M4 between the Sydney and the Blue Mountains. Over many years, I have watched side vegetation grow and provide visual relief, shade and refuge. I object to watching this vegetation being torn down, especially as once upon a time, the construction of the M4 motorway was then supposed to be the answer to Sydney's east/west transport problems. I object that this existing motorway vegetation is seen to have no real value within the EIS.

I object to the impact upon the habitat of birds and animals which live, forage and shelter amongst the vegetation and trees to be lost due to the construction or operational needs of the project.

I object to the fact that the project will result in the know **removal of about 15.7 hectares of vegetation, comprising 12.9 hectares of planted trees and screening vegetation (mainly from alongside the M4) and about 2.8 hectares of grassland with scattered trees (such as from Cintra Park and Reg Coady Reserve).**

I object to the loss of open space available for passive recreation and enjoyment and loss of trees from the Reg Coady reserve. There is too little green space available for passive enjoyment these days. Any loss is an unacceptable loss. As our urban environment is built up and becomes more densely populated, there is an increasing need for green space available for passive enjoyment, not less.

**I object to the loss of the ‘scattered trees’ within the Reg Coady reserve. Some of which are magnificent specimens and the home and staging posts for local birds. I object to the loss of cool, shade and shelter due canopy loss with the removal of trees in the reserve.**

#### **4.10.3.12      *Car Dependence***

Build a city for the people – and they will come. Build a city for cars – and congestion will prevail.

Ironically, it is these suburbs – targeted for destruction by Westconex – that demonstrates what the NSW Govt should be the planning for new outer suburb communities. The walkability factor - with ready public transport and local shopping centres. Local employment opportunities or employment centres (including high value jobs) within 60 minutes by public transport. Shared community spaces for gardening and leisure and social connectivity. Cultural and entertainment facilities for all ages.

The infrastructure planning for the new western suburbs, such as near Camden is woeful, with only 7% of Camden residents using public transport. Westconnex promotes socially isolating car dependence and the environmental impact of ever increasing traffic noise and air pollution – and does not provide residents of the western suburbs with any relief from congestion.

I object to this proposal as it is the wrong project for the wrong time.

#### **4.10.3.13      *Biodiversity and natural environment***

Australia has the notorious distinction of having possibly the worst extinction record on earth according to Richard Kingsford, professor of environmental science at the University of NSW. This is predicted to continue without serious changes to the way we conserve our environment

#### **4.10.3.14      *Biodiversity effects are defined narrowly in focusing on potential impacts on Threatened Species.***

Methodology and EIS statements re “the highly modified nature of the project footprint” (20-14)

Typically an EIS downplays or dismisses the habitat value within a project footprint in order to remove or limit the biodiversity-promoting value that is there, and/or to understate the impacts of the project. This EIS is no exception.

The EIS field surveys ( observations in the field) are very limited in duration and season (as usual in an EIS) – the “short duration of surveys” is acknowledged (20-3) as well as **“it is possible that seasonal species were not identified”**(20-3): for this EIS it was 1 day (12/2/15: no number of hours specified) and one night (27/2/15: also no duration specified) in one area (not specified where), with additional surveys on 12/3/15 and 26/6/15 “to investigate areas not covered by the previous surveys” (20-3). (It is not specified where if a physical location is referred to, nor whether it was day or night, and the duration).

Repeated sampling over some time period is really needed to develop anything representing a comprehensive survey. And if you are not (inclined to be) looking for it, you don’t tend to find it, and if you are quite time limited as all EIS’s are, you are falling well short of what is a satisfactory, let alone a rigorous survey process.

#### **4.10.4 Endangered Fauna**

##### **4.10.4.1 Green and Golden Bell Frog**

THE endangered Green and Golden Bell Frog is under threat as secret plans to build the WestConnex toll road through one of its last remaining habitats were quietly lodged to avoid public scrutiny.

The Green and Golden Bell Frog was once the most common frog species in the Sydney region but it now reduced to only two secure populations in the Sydney region – Kogarah and Homebush

The proposed development for WestConnex occupies the same area as the Green and Golden Bell Frogs on Kogarah Golf Course. Out of the seven locations where they were found, six of these locations are from ponds on the golf course and five of them are within the zone they have outlined for construction. Further the only two locations that are not impacted only supported small numbers of frogs. All the main ponds occupied by bell frogs have been zoned for construction, this construction zone is exactly where the frogs occur on the golf course, and they were not detected more widely despite the entire area being surveyed.

**In my opinion if this development were to go ahead as planned it would likely spell the end for the Kogarah population of Green and Golden Bell Frogs.**

Scientists are studying several species of Australian frogs - including the endangered green and golden bell frog - whose skin secretions are toxic to the multi-drug-resistant golden staph know as

MRSA. The GGBF secretions may be the wonder drug of the 21st century. Yet, the overall WestConnex project will more than likely be responsible for the extinction of such an important species, as part of the M5 East section.



THE endangered Green and Golden Bell Frog is under threat as secret plans to build the WestCONnex toll road through one of its last remaining habitats were quietly lodged to avoid public scrutiny.

#### *4.10.4.2 Rare Grey Headed Flying Fox*

The EIS acknowledges that **Grey-headed Flying-foxes (GHFF)** use the area when foraging for food. An evening field study, consisting of two evenings only, confirmed this.

The project footprint is well within the nightly foraging range of the Clyde/Duck River camp, as well as other urban Sydney GHFF camps.

Urban GHFF camps have become important to the survival of the species which is now classed as Vulnerable under Federal and State legislation.

Neither street trees nor private garden trees have been included in loss of area calculation (see more on this below). Trees in these “unaccounted for” areas can be and are very important food resources for GHFF feeding.

This foraging habitat should have been quantified in their assessment and their conclusion re GHFF foraging habitat impact. As a result the area and significance of foraging habitat has been understated. On 20-16, the EIS states that “These planted trees do not constitute habitat critical to the survival of the Grey-headed Flying-fox.”

As there is currently no declaration by either the NSW or Federal Government as to what constitutes critical habitat this statement is disingenuous.

Stating under the heading Cumulative Impacts (20-20) that the combined Westconnex projects would result in “the removal of mainly planted vegetation and associated fauna habitats” (20-20) is not an adequate assessment of the whole Westconnex’s project impact on Grey-headed Flying fox foraging habitat.

This species in its increasingly urban environment relies on much planted vegetation. Indeed the number of urban camps now in the Greater Sydney area is a result of the available food provided by such urban planted landscapes in proximity to camps – themselves also located in some cases amongst planted vegetation, especially as suitable habitat elsewhere in the species range has significantly contracted since European occupation (estimated at 50 % loss: Eby,P).

**The whole Westconnex project – combined M4E and New M5 will impact on urban GHFF foraging habitat to a significant degree.**

*Grey Headed Flying Fox by Andrew Meares*





#### ***4.10.4.3 Eastern Bentwing Bat***

The impact on this species will be the loss of foraging habitat and the disturbance of roosting sites. Again, as similar to all of our native animals within Sydney metro, the significant and continued loss of vegetation will have a serious impact on these local communities.

#### ***4.10.4.4 Micro - bats (Large-footed Myotis and Eastern Bentwing Bat)***

Given the very limited field surveys undertaken and poor quality recording of calls during these, the EIS cannot substantiate claims about the extent of use of existing infrastructure as roosting sites, nor claims about breeding habitat. The EIS claims there is no breeding habitat in the study area, but a breeding habitat can also include roof and wall cavities in the absence of tree hollows.

Nor is there substance to the claims about re-colonising new roosting sites eg. continuing to use culverts post construction disruption (20-16). There is no evidence quoted to indicate this will happen.

#### ***4.10.4.5 Vegetation***

It's stated as being substantially planted vegetation – “Planted trees and gardens”, including parkland, involving 15.7 hectares made up of 12.9 hectares of planted trees and screening vegetation (although inconsistently, the EIS also refers to 13.3 hectares on page 27-11), and 2.8 hectares of grassland with scattered trees (i.e. parkland).

The EIS has not quantified the loss in area and nature of vegetation from private gardens and street trees. This should have been done since they claim they are providing in this EIS “a detailed assessment of ecological issues including impacts on flora and fauna”.

The EIS included these areas in the 83 species number cited (20-6); it also should have been straightforward to map the coverage, and so approximate area covered by this private/street vegetation. This was not done. This downplays the role (and given the aforementioned, the extent) of vegetation of any sort. Irrespective of whether it is planted or remnant, it is potentially important and can play an ecological role (ref. Fly-fox info. above).

The EIS therefore makes no real assessment of the nature and quality of the planted vegetation which can stand in to some extent for remnant vegetation if well planned and maintained.

Dismissing it (just) as planted eg on 20-13 “All the above creek lines only have planted vegetation within their riparian corridors ....” fails to provide any further detailed (qualitative or quantitative) assessment as to ecological value as claimed.

All city vegetation is important in the context of preventing, and countering the urban heat island effect, a recognised phenomenon. For instance, see

<http://www.cityofsydney.nsw.gov.au/vision/towards-2030/sustainability/carbon-reduction/urban-heat-island> , and there are urban biodiversity benefits of both planted as well as remnant vegetation well acknowledged by others.

For instance see September 2015 (Vol. 16, No. 3) of *Ecological Management and Restoration (EMR)* (pp. 206-213). Trees and shrubs (although the latter is not mentioned in the EIS) certainly “have the potential to provide nesting and shelter habitat for common birds and possums” (20-12). Not mentioned is that they also provide food resources either directly, or indirectly. This is a sloppy omission, but again it downplays and limits the vegetation’s role.

#### ***4.10.4.6 Statement that vegetation connectivity is limited***

Some animal species manage quite well in small and fragmented patches, and providing that patch distance is not too great other species are able to move between and utilise such patches.

Suburban gardens are an example of this even where there is no direct house to house connectivity and there are roads and footpaths separating areas; an example animal species would be the once common Superb Blue Wren, a small bird species which moves between home gardens finding necessary resources (nesting sites, shelter, food) quite satisfactorily. Ditto Blue Tongue Lizards, also



once common but now in decline in urban areas. Given the EIS has not quantified nor assessed the ecological role of private gardens and street plantings (see above), EIS comments about connectivity do not tell the whole story and so the potential connectivity (and ‘stepping stones’) that exist via this vegetation is ignored.



#### ***4.10.4.7 Cooks River Castlereagh Iron Bark bushland***

Another cumulative impact on our natural environment, with the loss of a critically endangered stand, a development condition of the first M5, will be destroyed.

Threatened Flora - **Cooks River Clay Plain Scrub Forest**, located north of the M5 East Motorway, was significantly impacted by the original M5 construction. The remnant remaining is in good condition and is used by the Grey Headed Flying Foxes for foraging.

The Scientific Committee, established by the Threatened Species Conservation Act, had made a final determination to list the Cooks River Clay Plain Scrub Forest as an ENDANGERED ECOLOGICAL COMMUNITY on Part 3 of Schedule 1 of the Act. Listing of Endangered Ecological Communities is provided for by Section 12 of the Act. (THREATENED SPECIES CONSERVATION ACT 1995 No 101)

Noted by the Scientific Committee that they are of the opinion that Cooks River/Castlereagh Ironbark Forest in the Sydney Basin Bioregion is likely to become extinct in nature in New South Wales unless

the circumstances and factors threatening its survival or evolutionary development cease to operate and that the community is eligible for listing as an endangered ecological community.

**The community had worked hard to save this from M5 version 1.**

#### ***4.10.4.8 Rosecomb – at Wolli Bush found***

Some months back, Fungi displaying a rare abnormality linked to vehicle pollution have been found near the existing M5 emission stack at Turrella.

Joanna Robinski of WCPS likens Rosecomb to a dead canary in a coalmine. “Finding Rosecomb is another wake-up call for local residents,” she said. “Since 2012, when the World Health Organisation upgraded the status of diesel fumes to the highest level of human carcinogenicity, we’ve had confirmation of the ill-effects of pollution. This provides further evidence that living alongside emission stacks negatively impacts the biota of our environment as well.”

The abnormal fungi – found only near the stack – needs further assessing.

#### ***4.10.4.9 Ramsar Wetlands***

Wetlands provide significant economic, social and cultural benefits. They are important for primary products such as pastures, timber and fish and support recreational and tourist activities. Wetlands also help reduce the impacts from storm damage and flooding, maintain good water quality in rivers, recharge groundwater, store carbon, help stabilise climatic conditions and control pests. They are also important sites for biodiversity.

Wetlands cover about 9% of the earth’s surface and are estimated to contain around 35% of global terrestrial carbon. Wetlands act as sinks for carbon dioxide and other greenhouse gases, especially if their vegetation is protected and their natural processes are maintained.

Without biodiversity the variety of all life forms, local ecosystems and in turn, human societies, cannot survive. Although highly urbanised, the City has retained several small **bushland** and **wetland** areas which play an important role in terms of providing food, habitat and shelter for native animals. These areas are deemed to have ‘conservation value’ (meaning they are worth preserving for future generations) because they represent ecosystems that would otherwise be lost.

The proposed F6 extension ( which is referred to as a given in the EIS although it is not even in early stages of planning) will likely also impact on the Rockdale wetlands – another significant loss to our natural and human environment.

I object to the sectional approach taken to the Westconnex project which makes it difficult to properly assess the cumulative impact on our wetlands across both Westconnex and Southconnex

I object to the unwarranted destruction of what remains of our natural environment for a project which is managed by politicians and business people who continue to hide the business case on which it is

based. Westconnex managers have been unable to properly debate or refute the many informed critiques of the project.

#### **4.10.4.10 Conclusion**

In an age of shrinking backyards and an ever-increasing urbanised metropolis these remnants of natural spaces and parks are much more than sanctuaries for our native wildlife and remnant flora - they are places for individuals, families and groups to play, relax and to simply enjoy the wildlife and flora that exist in these spaces. These places have important cultural and social significance, and they need our protection. Climate change, greenhouse gas emissions and noise pollution further strengthen the argument that building more motorways is not the right direction to take.

Our aim is to give our natural spaces a voice, and to lobby State, Federal and Local governments to protect them for wildlife, for our community and for future generations, and to propose sustainable transport options rather than freeways.

**Is the cost and destruction to endangered fauna and flora, hectares of parks, air quality and loss of many homes and businesses worth a one kilometre per hour speed increase (source KGR M5 eis pg 'v')?**

#### **4.10.5 Flooding**

During construction, there is the potential for local catchment runoff to enter project excavations at the interchange locations and impact the construction ancillary facilities. Construction activities also have the potential to exacerbate flooding conditions in adjacent developments. The mitigation stated are physical barriers designed to protect the works areas and tunnel entries so as not to increase flooding conditions in adjacent areas. The public needs full independent advice on the safety of the tunnels which is not possible in the short period allowed for consultation.

#### **4.10.6 Urban Salinity**

I am concerned about the potential for salinity damage that can shorten the life of urban infrastructure such as roads, buildings, water and sewage pipes. This leads to costly maintenance and repair by homeowners and councils.

The movement of excess water and salt in parks and gardens can affect plant growth and cause plant death. Sports grounds and recreation areas affected by urban salinity may become bare, unattractive and unusable. Soil properties can be altered significantly making it hard to revegetate these areas.

Pockets of native vegetation in and around urban landscapes may also be affected. This can have serious consequences including the disappearance of native flora and fauna and poor downstream water quality.

I am concerned about the impact of groundwater and the potential for increased risk of flooding due to the reduction of greenspace.

The public needs access to more independent technical information so that they can understand the true impacts of the project.

**I conclude that Westconnex comprehensively fails one of its claimed core objectives - '*Protect natural and cultural resources and enhance the environment*' is not met by the Westconnex**



**project.**

## **5 Noise and Vibration**

### **5.1 Comments on Noise and Vibration Assessment**

SLR Consulting was hired by Westconnex to conduct an assessment of the noise and vibration impacts of the Westconnex. Its report can be found in Chapter 10 of Volume 1A from [10.1 onwards](#) continued at 10-3 -10-47 [here](10-3 -10-47) and also in [Volume 2C, Appendix I](#).

Noise could have a long term impact on those who would live beside the proposed M4 East or in local streets and roads carrying extra traffic nearer tunnel exits and on 'rat runs'. Construction noise from demolition, thousands of truck movements a day and rock crushers would impact on local communities and businesses. In some situations this could occur for several years. In others, the impact would be over shorter periods. Research has shown that [noise does have negative effects on health](#). Vibration from construction including tunneling could cause cracked walls. Westconnex has already begun warning residents of this risk.

The SLR report does recommend noise mitigation for some buildings, although only up to the first story. It recommends noise walls and other strategies that would reduce the noise. Some buildings on Parramatta Rd that would under normal circumstances be offered noise protection would be left exposed so that the land between these buildings and the motorway can later be developed.

In the absence of that we asked an environmental scientist to review the material in Chapter 10 in the EIS. For personal reasons to do with her employment, we cannot publish the environmental scientist's name.

It's worrying that there are many gaps in the EIS and much is also left to future decision making during the final design phase. There are many issues here that need following up.

The EIS reports are presented in ways that even make it difficult for residents to see whether their neighbourhoods would be affected by excessive noise levels or not. While it's expected that technical data can be hard to understand, the summary chapter should be presented in a more accessible way. This is just one of the reasons why residents want more time for the consultation period so that they could hire their own independent consultants. We can safely say that the EIS shows that hundreds of homes and thousands of residents would be affected by noise either during the 3 year long construction period or after the opening of the tunnel should it be allowed to proceed.

## 5.2 Gaps in Westconnex EIS analysis.

### 5.2.1 Deficiencies in reporting of noise monitoring results

Table 10.2 does not provide information on what times of day, evening or night the noise levels presented for the attended noise monitoring was undertaken. If the purpose of the attended monitoring was to support the data gathered through unattended monitoring, then attended noise monitoring results for each of these time periods should be provided.

### 5.2.2 Construction noise management levels

Table 10.3 states out that the noise management levels (NMLs) for construction works during standard hours should be the rating background level (RBL) +10dBA and the rating background level +5dBA for out of hours works (based on the [Interim Construction Noise Guideline](#) (INCG), however not all of the NMLs for the project have been accurately calculated in Table 10.4 when compared to the measured INCG RBLs in Table 10.2.

For example:

INCG RBLs for monitoring location L23 are 53dBA (day-time), 52dBA (evening) and 46dBA (night-time) which should make the out of hours NMLs for this location 58dBA (day-time), 57dBA (evening) and 51dBA (night-time), however the night-time NML in this table is shown as being 54dBA

INCG RBLs for monitoring location L22 are 53dBA (day-time), 53dBA (evening) and 49dBA (night-time) which should make the out of hours NMLs for this location 58dBA (day-time), 58dBA (evening) and 54dBA (night-time), however the NMLs shown in this table are 66dBA (day-time), 62dBA (evening) and 47dBA (night-time)

**There are other inaccuracies in the calculations given and this whole section needs to be reviewed and amended as necessary. This would then need to be compared against the data predicting exceedences of the NMLs to ensure that these are based on accurate NMLs.**

**Given the significant predicted noise impacts discussed in later sections of the EIS, this is absolutely critical to get right so that the local community can make an informed decision about what the potential noise impacts are likely to be.**

### 5.2.3 Sleep disturbance during construction

Page 10-11 states that a sleep disturbance NML of 55dBA LAFmax (internal) and 65DBA LAFmax (external) has been adopted, however Table 10.4 provides varying sleep disturbance NMLs for each noise catchment area and does not specify whether the sleep disturbance NML is internal or external.

\*\* Page 10-29 summarises that Tables 10.14 to 10.19 show that sleep disturbance criteria are predicted to be exceeded during all construction scenarios that are proposed at night and notes that the INCG only requires consideration of maximum noise levels when more than two consecutive nights are proposed. More detail on how potential sleep disturbance would be managed must be included in the EIS given the proposal to conduct such extensive out of hours works as identified throughout this section of the EIS.\*\*

### 5.2.4 Construction vibration

In s10.3.2 on page 10-15 there is discussion about the application of blast vibration criteria with a statement:

“For projects such as this, with a shorter duration of blasting of 12 months or less, a higher vibration criterion may be reasonable. For this project, the location of the blast moves along the alignment such that any one receiver is affected for only a short period of time.”

**With no detail given about how long ‘a short period of time’ is, there is no way to determine whether it is appropriate that a higher vibration criterion be permitted, irrespective of whether or not the referenced standard was developed for mining operations rather than road tunnel construction.** Given the range of sensitivities to vibration within any one community, it would be more appropriate to apply a conservation measure in the first instance.\*\*

In s10.3.2 the control of damage from air blast is discussed and there is a statement that:

“Nominating appropriate criteria for heritage buildings generally require site inspections; this would be confirmed during detailed design.”

The SEARs state that the EIS must “include an environmental risk analysis to identify the potential environmental impacts associated with the infrastructure” and “where relevant...must include...measures to avoid, minimise and if necessary, offset the predicted impacts, including detailed contingency plans for managing any significant risks to the environment.”

**If nominating appropriate criteria for the control of damage from air blast requires further site inspection then this should be conducted as part of the EIS process in order to meet the requirements of the SEARs as referenced above. Delaying this until detailed design, the completion of which would realistically occur some time after the commencement of construction should the project be approved, is not adequate given the potential impacts to the heritage and the concerns about this in the community.**

Table 10-23 shows a total of 203 residential and light commercial buildings, 238 typical buildings, 11 heritage listed and 13 structurally unsound buildings are within safe working distances of highest vibration plant for cosmetic damage. 493 buildings are within the human response criteria for vibration. Additionally, three more properties are within the safe working distance for human response due to proposed tunneling activities.

**This is a large number of buildings that are going to be placed at risk of cosmetic damage and an even more significant number of buildings within which people would be at risk of experiencing adverse effects from vibration. The number of buildings predicted to be impacted**



**by vibration is worrying, particularly for the human response criteria as this impacts on the health and wellbeing of residents.**

Page 10-35 refers to a detailed analysis of the potential vibration impacts needing to be undertaken for locations where the predicted and/or measured vibration levels are greater than the nominated screening levels, but no timeframe is supplied for this. Similarly, s10.4.5 discusses the need for further investigation into predicted noise and vibration levels after confirmation of the scope of blasting to determine whether or not the cosmetic damage and human comfort criteria would be met.

Given the significant numbers that are predicted to experience vibration impacts, both of these analyses should be undertaken as part of the EIS process so that the local community and potentially impacted residents can make a fully informed opinion on the proposed project.

**The proposed management measures in this EIS are also not adequate to mitigate the potential vibration impacts on such large numbers of receivers as they do not discuss ways to reduce or eliminate vibration impacts or provision of respite. More rigor should be applied to determining the exact extent of potential impact and what would be done in a practical sense to ensure that people and buildings are not exposed to potentially damaging levels of vibration.**

#### **5.2.5 Demolition of buildings**

Table 10-13 shows that in 13 NCAs exceedences of the NMLs are predicted to be up to or more than 25dBA during day-time works. Given the RBLs are 10dBA less than the NMLs, then this means that over half of the NCAs would experience noise levels of up to or more than 35dBA above the existing background level during demolition. **The Transport for NSW Construction Noise Strategy referenced on page 10-5 of the EIS categorises this level of noise impact to be “highly intrusive” as it uses the rating background level as the starting point for determining exceedences.**

What is proposed to mitigate noise impacts associated with demolition? As a minimum, highly affected receivers should be offered respite (accommodation elsewhere paid for during construction period.)

#### **5.2.6 Work area establishment**

Table 10-14 shows exceedences of up to or more than 25dBA above the NMLs are predicted for work areas establishment in 14 NCAs during standard daytime hours, with exceedences of more than 25dBA predicted for all but two sets of receivers during out-of-hours works. **These exceedences are excessive and would have a significant impact on nearby receivers.**

#### **5.2.7 Construction facilities**

Table 10-16 shows that operation of construction facilities is predicted to significantly exceed NMLs during night-time operations, including exceedences of 50dBA or more in 4 NCAs and 11 NCAs that are predicted to exceed night-time NMLs by 30-50dBA. This represents a significantly intrusive impact to residents and night-time operations should not be considered reasonable for residents to have to endure in these locations.

#### **5.2.8 Road construction**

The opening paragraph on road construction states that new road works would be undertaken within the construction footprint, however out of hours works would be likely to minimise impacts to traffic and reduce safety risks for workers. If the works are being conducted entirely within the construction footprint, then why would there be potential impacts to traffic and workers safety? Does this actually mean that new road works would be undertaken within areas that are currently in use for road operations?

Table 10-17 shows that exceedences of over 25dBA above the NMLs are predicted for the majority of NCAs for all time periods during road construction works. Given the significance of this level of exceedence, more detail should be provided about exactly how much over 25dBA predicted exceedences are for each of these time periods. The information presented in the table indicates that the majority of the NCAs would experience high noise impacts (at the higher end of “moderately intrusive” as defined by the TfNSW CNS) for the duration of road works. This represents a significant burden on the local community, particularly during out of hours works when sleep disturbance is likely.

### 5.2.9 Tunnelling

Tunneling is proposed to be carried out 24 hours a day, seven days a week and some above ground tunnel construction ancillary facilities would also be in use 24 hours a day, seven days a week to support tunneling works. Page 10-28 states that:

“NMLs for residential properties located close to the tunnel construction ancillary facilities are predicted to be exceeded by more than 25dBA during the night-time periods. These exceedences would be restricted to residential properties directly adjacent to tunneling sites. Where exceedences are expected, properties would be considered for construction mitigation.”

**Even with the proposed installation of acoustic hoarding and the assumption that this would afford a 10dBA reduction in noise levels, there would still be residential receivers who would experience exceedences of more than 25dBA above the NML, as shown in Table 40 of Appendix I.**

It is unacceptable to expect residents to be subjected to such potentially high noise levels 24 hours a day, seven days a week as this provides no respite from noise, light, dust and traffic impacts. It is also noted that the statement above gives no certainty about whether or not mitigation would actually be implemented, merely considered.

### 5.2.10 Proposed Noise Mitigation

I consider that to suggest to a significant number of households and schools – that mitigation to increased traffic noise and pollution by ‘simply staying indoors’ is an unacceptable impact on the way people lead their lives. To never use ones backyard or enjoy recreation of what is left of our parks due to the unacceptable a





Residents studying the EIS while questioning the legality of early drilling in Haberfield

## 6 The project represents lost opportunity for better transport investment

As mentioned earlier, it is a tragedy for Sydney and NSW that the rational initiatives put forward by Ms Berejilian in the NSW Transport Master plan have been cast aside for this flawed project.

Alternatives that would have been regarded as long term assets as put forward by EcoTransit in their recent newspaper :

- Parramatta – focused light rail network.
- Modernise rail signaling to increase increase capacity
- East – West Translink – extending light rail network from Dulwich Hill through to the Airport using unused rail space

- Kingsgrove “Last chance” Park & Ride
- Retrofit two extra stations at Airport Line
- Buyback the Airport line and reduce train fares to standard rates at the Airport stations and also removing the anti-competition clause
- Sydney-Newcastle rail line upgrade (stage 1)
- Parramatta Road Light Rail (CBD to Olympic Park)
- White Bay GreenLink
- Cycling storage at selected stations to complement a rail and ride concept
- More rail capacity and frequent services for the Western Sydney Rail Line
- Pippita Express Solution using spare rail space

The combined cost of all of these projects come in significantly less than \$15 billion and would make a genuine dent in the problem of road congestion. These projects particularly would soak up much of the single passenger vehicles off the M4 and M5, clearing the road significantly for tradies and freight.

The science is clear – **Faster road network speed depends on faster public transport.** Take for example the recently built Gold Coast Tram. Patronage on the tram was delightfully beyond expectations. As a result, the performance of the parallel Gold Coast Hwy also significantly improved.

This is genuinely a tragedy to Sydney and NSW, particularly taking into account the WDA boast contained the King Georges Road M5 interchange (page v in volume 1) that “Sydney’s network will improve by one kmph on completion of the entire project”. Wow. Or more to the point, rather an underwhelming outcome.

**I therefore reject the WestConnex project in its entirety, as it represents a tragic loss to the people of NSW in honestly addressing the congestion issues of Sydney.**

## **7 The project fails justification that it is in the best interests for the public**

I reject the WestConnex project in its entirety, as public health and wellbeing has been completely disregarded. This is a huge gamble on people’s health, and the future funds to cover medical costs.

### **7.1 Health Impacts Summary**

- This Human Health Risk Assessment is not accepted as a reliable study of the health risks of the WestConnex project
- This assessment has several serious flaws, but the key one is that it is not independent. It relies completely on the findings of the Air Quality Impact Assessment (Volume 2B,

Appendix H), which in turn relies on the WRTM traffic forecast model. It does not question, in any way, the findings of the Air Quality Impact Assessment, thus does not assess the health risks of the very real potential for induced demand on Parramatta Road.

- Both NO<sub>2</sub> and PM<sub>2.5</sub> levels are already elevated and above guidelines in many of the localities within the project area, so any additional traffic due to induced demand (in tunnels or on surface roads) will add to this situation.
- This risk assessment does not point out that the air quality standards or guidelines used in the EIS may be superseded by stricter ones at the end of 2015 when the new National Environment Protection (Ambient Air Quality) Measure (NEPM) standards are passed
- A truly independent health risk assessment would have concluded that peoples' health was already being compromised in this corridor, and that further "hot spots" are going to be created by the project and that the relevant government authorities should be taking action about it, including by urgently implementing the National Clean Air Agreement.
- Other cleaner forms of transport are required in this corridor.
- Diesel fuel vehicles need to be phased out quickly, as is happening in France and proposed in other parts of Europe.

## **7.2 The Westconnex/AECOM Human Health Risk Assessment reaches the following overall conclusions**

- The tunnel doesn't need filtration as there will be negligible pollution at the portals and the ventilation stack will disperse pollutants across the air-shed with negligible effect on local residents
- A detailed assessment of two key pollutants (nitrogen dioxide – NO<sub>2</sub> – and particulate matter measured in microns – PM<sub>10</sub>, PM<sub>2.5</sub>) is required, given their known associated health effects and the impacts of their co-exposure (common in urban environments) and the known main source of PM<sub>2.5</sub> (and finer) in the urban environment being vehicle diesel exhaust
- Potential health impacts associated with changes in air quality (specifically NO<sub>2</sub> and PM) within the local community was assessed as low and essentially negligible
- There are some residents who will have an increased exposure to PM as a result of the redistribution of emissions from surface roads
- There are some residents who will be exposed to less PM<sub>2.5</sub> as a result of the project
- Summary of mortality data for three key factors (COPD, lung cancer, cardiovascular disease) indicates that Sydney Area Health Service has rates higher than the average NSW rate for all

three indicators; summary of hospitalisation data for key factors (asthma, cardiovascular disease, COPD) shows asthma rates similar to NSW and cardiovascular disease and COPD less than NSW rates (possibly accounted for by high GP service level in Inner Sydney)

- Increases in population (and its distribution) of the suburbs within the project footprint will have no impact on the health outcomes
- The time spent exposed to pollutants within the tunnel is very short (minutes) and in the absence of published guidelines for NO<sub>2</sub> and PM within tunnels, advises keeping vehicle windows up and air con on recirculation setting
- Potential for noise and vibration impacts during construction could result in adverse health effects so management and mitigation plan required for health effects
- After construction, some properties will have elevated road noise so mitigation measures are required
- In such a complex project, there are inherent uncertainties in each of the methods used to estimate emissions and concentrations, and there are limits to how accurately any impacts in future years can be predicted

### **7.3 Summary of key air quality issues accepted by the Health Risk Assessment**

- By 2021, without the project, the maximum (residential and commercial) 1-hour concentration of NO<sub>2</sub> estimated to be (in micrograms per cubic metre) 375ug/m<sup>3</sup> and 360ug/m<sup>3</sup> (respectively) – which is well above the guideline (of 246ug/m<sup>3</sup>); with the project completion, the levels estimated as 307ug/m<sup>3</sup> and 286ug/m<sup>3</sup> (respectively) – still well above the guideline.
- By 2021, with the project, the cumulative (maximum annual average, rather than acute) NO<sub>2</sub> concentrations estimated to be below the guideline of 62ug/m<sup>3</sup>
- By 2031, with the project, cumulative NO<sub>2</sub> concentrations estimated below the guideline of 62 ug/m<sup>3</sup>
- By 2021, without the project, the maximum (residential and commercial) 24-hr average concentration of PM<sub>2.5</sub> estimated to be 29.3 ug/m<sup>3</sup> and 30.5ug/m<sup>3</sup> (respectively) – which is significantly above the guideline (25ug/m<sup>3</sup>); with the project completion, the levels estimated as 28.2ug/m<sup>3</sup> and 26.6ug/m<sup>3</sup> (respectively) – still above the guideline
- By 2031, with the project, PM<sub>2.5</sub> levels estimated as above the guideline

- By 2021, without the project, the maximum (residential and commercial) 24-hr average PM10 concentration estimated as 54ug/m3 and 55.4ug/m3 (respectively) – above the current guideline (50ug/m3) and well above the recommended (from the 2014/15 review) of 40-50ug/m3
- By 2021, with the project, the maximum (residential and commercial) 24-hr average PM10 concentration estimated as 52 ug/m3 and 50ug/m3 (respectively) – above both the current guideline and recommended (review) guideline
- By 2031, both without and with the project, PM10 will be above both guidelines
- Community locations most at risk by 2031 of mortality, cardiovascular and respiratory illness from increases in PM2.5 concentrations are: **Homebush Boys High School, Ella Community Child Care Centre, St Joan Of Arc Catholic School, Dobroyd Point Public School, Woodfield Aged Care Centre**

#### 7.4 Methodology of the Health Risk Assessment

*The Risk Assessment relies on key aspects of the Air Quality Impact Assessment including:*

- The tunnel design claim that there will be negligible impact at sites of portals and ventilation stacks
- The findings of the air quality report within this EIS, which relies heavily on the air quality data from the 3 OEH monitoring stations at Rozelle, Chullora and Earlwood, one of which, Rozelle, does not monitor PM2.5
- Traffic estimates within this EIS (which in turn rely on the population estimates).

*For the health indicators, it relies on:*

- data that is five (5) years old for the key health indicators
- hospitalisation data only for respiratory indicators, and *has not included any GP data relating to consultations.*

It does not include the demolition of buildings (houses and commercial) in the risks associated with the project, even though a high proportion of pre-1980's buildings could have some asbestos on the sites.

## 7.5 Flaws in the Health Risk Assessment Methodology

- It accepts the claim that the tunnel design is “state of the art”, and doesn’t canvass options to filter using actual “state of the art” like the Hong Kong Wanchai By-Pass tunnel and Madrid (Spain) M30 Ring-Road.
- Residents at the Kingsgrove RSL (no) information session were advised by the Tunnel Ventilation representative that the Hong Kong tunnel is filtered due to the proximity of 25 story apartment buildings. This admission by WDA staff proves that Sydney is receiving a cheap ‘ventilation’ solution despite a similar situation to Hong Kong
  - Parramatta Road is planned for apartment buildings of 25 storeys
  - Moorefields Rd Primary (on a hill) is located very close upwind from the Kingsgrove business park poison stack located in a valley.
- It accepts a tunnel design that infers there will be no pollution at tunnel entry or exit ramps, with the speed into entrance ramps relying on the “piston effect” to pull vehicle emissions into the tunnel and into the ventilation stack. A close questioning of the “experts” (at a number of the WDA consultations) about tunnel exit ramps where they hit Parramatta Rd and West City Link, found they agreed that **there would be pollution in the vicinity of ramps if traffic hits congestion on exiting, and the same would be true for queuing traffic to enter tunnels. Thus their definition of “portals” is strictly that entry/exit area within the tunnel, not leading into or out-of the tunnels.** An independent risk assessment would have noted the possibility of build-up of pollution around these portal sites and the consequent health impacts.
- More real-time local air quality data should have also been used, particularly from near the sensitive receivers, given that the nearest two OEH monitors are some distance from these sensitive receivers. The OEH monitor at Chullora is closer to the Homebush/Nth Strathfield receivers, whilst the OEH Rozelle monitor is closer to the Haberfield/Ashfield receivers. However, both of the monitors are more than five (5) kilometres from these receivers and are not measuring real-time air quality in a 6kmx8km square area that has five of the heaviest-trafficked roads in Sydney. A very high proportion of residents in this 48 square km area live within 300metres of one of these main roads, so are exposed to much higher levels of NO<sub>2</sub> and PM than are claimed in this report and based on the data from OEH Chullora and Rozelle monitoring stations. In fact, the OEH Rozelle station (located in the leafy grounds of the old psychiatric hospital near the river) does not collect data on PM<sub>2.5</sub>. \*\* An AMA submission into air quality states that the current air quality monitoring system in Australia does not



adequately capture data relating to the exposure of vulnerable groups; and information on the levels that specific communities are exposed to, and the subsequent risk, is often unknown; the AMA believes the current monitoring system is only capturing data that represents exposure of the broader population, not people at “hot spots” – these “hot spots” would include the large number of residential and commercial properties within 300 metres of major roads (Australian Medical Association (March 2013), Submission to the Senate Standing Committee on Community Affairs, Inquiry into the impacts on health of air quality in Australia, p7). The Human Health Risk Assessment itself indicates there are 10,000 residences and commercial units (which includes multiple apartment blocks) within the affected zone. A conservative estimation of this population would be 40,000 people who may already be living in “hot spots”.

- the data collected at the four (4) roadside air quality monitoring stations can be supplemented by similar data from the Lane Cove study (Cowie et al, 2012) collected at Parramatta Road Camperdown in 2006-2008, which indicated highly elevated levels of NO<sub>2</sub> and PM<sub>2.5</sub>. The traffic count (2005) at the Camperdown (control) site in that study was 65,000 vehicles/day, which is a little fewer than the City-West Link count of 69,000 vehicles/day and higher than Parramatta Road (at Dalhousie St Haberfield) of 54,000 vehicles/day (NSW RMS Average Daily Traffic 2012). All this data shows that levels are already higher than the guidelines, which themselves have been questioned by the AMA and several other groups in their submissions to the Senate Standing Committee On Community Affairs Inquiry Into The impacts On Health Of Air Quality In Australia.
- It should have noted that the new national air quality standards to be endorsed at the end of 2015, well before the project starts, may include higher standards for PM<sub>10</sub> than are used in this EIS. The outcome could be many more “hot spots” than acknowledged in the Air Quality Impact Assessment.
- The study should have noted that several international studies have shown the adverse health effects of living less than 500 metres from major roads. In one longitudinal study of 2,300 children in Los Angeles, Guaderman et al found that improvements in the air quality (particularly PM<sub>2.5</sub> and NO<sub>2</sub>) over several years had dramatically improved the lung function of children living less than 500 metres from major roads (Gauderman WJ, Urman R, Avol E, Berhane K, McConnell R, Rappaport E, Chang R, Lurmann F, Gilliland F. 2015. Association of improved air quality with lung development in children. N Engl J Med. 372(10):905-913). A paper that calculates the medical costs of air pollution indicates that even the NEPM standards give a false sense of “safe” levels of pollution. This report states that as average

levels of air pollution increase so do the average adverse health effects and that in fact there is no safe threshold. The paper claims that proper cost benefit analyses should be undertaken to accurately quantify adverse health effects due to both local and general increases in air pollution (Barnett, A, 2014 “It’s safe to say there is no safe level of air pollution” Australian and New Zealand Journal of Public Health 2014 vol. 38 no. 5). The health risk assessment does not acknowledge any critique of what is considered a safe threshold because it completely accepts the assumptions of the Air Quality Impact Assessment. Available evidence doesn’t indicate there is an exposure threshold for PM below which health effects do not occur; thus this risk assessment should have erred on the side of caution.

- The study should have noted the large number of people living, working and schooling less than 500 metres from Parramatta Road and thus at an already elevated risk of health damage; it also should have noted the increased risk if this corridor does not have the reduced traffic volume estimated by the WRTM, given the additional sources from the tunnel traffic.
- A scenario including all risk factors for 2031 should have been discussed – that of increased traffic on the surface of Parramatta Road the full length of the project. The concept of ‘induced traffic demand’ is a real one and has not been taken into account by this health risk assessment. A meta-analysis of induced demand (Cervero, R, 2001, Induced Demand: An Urban and Metropolitan Perspective, Paper prepared for Policy Forum, US Environmental Protection Agency) concluded that, whilst there were a range of elasticities associated with increased demand with new road infrastructure, the phenomenon should not be trivialised
- The study ignores the possible contribution of the project to the estimated health costs of the Sydney region. In 2005 in Sydney motor vehicle pollution alone accounted for \$1.5b in health costs (Australian Bureau of Transport and Regional Economics, 2005, cited in Senate Standing Committee On Community Affairs Inquiry Into The impacts On Health Of Air Quality In Australia, NSW Environment Protection Authority Submission, September 2013, p15). As this report states ... “particle pollution is the driver for the high public health costs of air pollution” (ibid).
- The mortality data for three key factors (COPD, lung cancer, cardiovascular disease) shows that Sydney Area Health Service has rates higher than the average NSW rate for all three indicators, yet this risk assessment does not question whether exposure to already elevated levels of NO<sub>2</sub> and PM<sub>2.5</sub> may be a cause of these elevated rates.
- The reliance on five years old data for the key health indicators is problematic, given background sources of key pollutants (NO<sub>2</sub> and PM<sub>2.5</sub> and PM<sub>10</sub>) have increased in that five year period, as evidenced by vehicle fleet data. According to the Sydney Morning Herald



(March 15-16 2014) the number of diesel vehicles on the road in Australia has more than doubled since 2005. ABS data shows that in 2015 there are 3.6 million diesel powered vehicles, accounting for 19.7% of the fleet; and over the five year period from 2010, the number of Passenger vehicles and Light Commercial vehicles registered with diesel fuel increased by 96.4% and 62.9% respectively (ABS, Motor Vehicle Census, Australia, cat no 9309.0). This increase in diesel fuel use would have had both short term and longer term impacts on health in the period since this health data was published and has not been captured by it, nor has this health risk assessment mentioned increased risks from the growing diesel fleet. The other concern with growth of the diesel fleet relates to car manufacturers using software called “defeat devices” that allows the masking of exhaust emissions in pollution control tests. Recent revelations (eg SMH, Sep 23 2015) of such corruption by what was thought of as a “good corporate citizen” – the Volkswagen company – indicates the distinct possibility that other manufacturers may be doing the same. If the environmental protection laws are being flouted by many diesel fuel vehicle makers, then the claim by this EIS that tougher laws are making the Australian vehicle fleet (and therefore the air) cleaner is questionable. The best option for any government keen to improve air quality in polluted parts of Sydney would be to quickly phase out diesel vehicles.

- Hospitalisation data for respiratory indicators should have been supplemented by GP survey data (given Medicare does not collect this level of data), collected by the relevant Local Health Districts.
- Sydney Area Health Service collects data on health risk factors, published for each Local Health District. The risk factor model is one that can be called a “personal behaviour” model. It includes risky alcohol drinking, smoking, consumption of fruit & vegetables, being overweight or obese, and adequate physical activity). It does not include external risk factors, like living within a few hundred metres of a busy road. The fact that the Area Health Services in NSW do not collect data for external risk factors, although they are known (e.g. exposure to coal dust (mainly PM10) and road pollution (notably NO2 and PM2.5) means that more meaningful data is not available to these types of Human Health Risk Assessments.
- The health impacts from noise and vibration seem to be underestimated by this health risk assessment. The writer should have conducted an independent analysis of that assessment, rather than relying on its findings. A independent review of the noise and vibration section of the EIS ( which will be published by the People’s EIS soon) raises uncertainty in a range of areas of the noise and vibration assessment. It states that, given the number of potentially impacted properties and people within the project area, further work needs to be done to

ensure the local community and other affected stakeholders are provided with a fully informed assessment. This needs to occur as part of the EIS consultation process where further comment can be sought from the community, and not simply resolved through the [Submissions Report](#) which does provide for any further input from the community.

- The health risk assessment should have included a risk assessment for asbestos and a management plan for mitigating risks, given serious community concern has been expressed over issues with asbestos removal and treatment at Granville (M4 widening stage) and at Alexandria (M5E stage).
- It is common practice in health research (including health risk assessments) to identify and analyse any related health studies to understand their the implications for the project being assessed-in this case the WestConnex project. Two such studies have been conducted on the Lane Cove Tunnel and on the M5East tunnel. The risk assessment ignored the ‘fine print’ findings of both of these studies. The Lane Cove study was of the short-term respiratory (asthma-like symptoms) health effects of exposure to emissions from the tunnel stack. The study was conducted 2006-2008, with thirty six (36) participants originally, falling to twenty (20) by 2008. This is a very small cohort from which to draw any strong conclusions. The “control site” was Parramatta Road, Camperdown. The main conclusion was that residents near the eastern tunnel stack reported increased symptoms (even though there were no increases in pollutants) and this could be accounted for by other sources of pollution not measured in the study (e.g. particles smaller than PM2.5 and/or volatile compounds) or other unknown sources. The study also found significant adverse effects of increased airway inflammation, and chest and eye symptoms associated with exposure along Parramatta Road Camperdown after only 2-hour exposure periods. The authors recommended a follow-up study to better understand the effects of the ventilation stack. (Christine T Cowie et al, 2012, ‘A randomised cross-over cohort study of exposure to emissions from a road tunnel ventilation stack’, BMJ Open 2012;2). No further studies have been conducted.
- In the study of the pollution effects of the M5 East tunnel (NSW Health, 2012), it was stated that the ventilation stack was an important source of air pollution in the area within a 2 km radius, contributing 23% of NOx and 17% of PM10. The study’s aim was to consider cancer incidence in the vicinity of the tunnel stack. Whilst it found there was a significantly higher incidence of lung cancer in postcodes immediately around the stack, the study concluded that it was unlikely there was a causal link. However, the study did qualify its overall conclusions with the comment that the descriptive epidemiological method used in the study was a relatively weak tool to resolve the type of issues under investigation. The study methodology

was unable to discern the types of lung cancers screened in the area (smokers vs non-smokers). The study's argument was that, given lung cancers can take a number of years to become apparent, the higher incidence recorded after the opening of the tunnel may not have been connected to the stack emissions. The study concluded that the higher incidence of lung cancer probably pre-dated the locating of the stack in that area. This is an alarming finding, given that the cancer registry data would have been available to NSW Health, Department of Main Roads and the other bodies responsible for the EIS prior to the building of the M5East. So it would appear that an area of Sydney which already had an elevated incidence of lung cancer was chosen as the site of the M5East ventilation stack, when health research was already indicating the causal link between particulate matter and lung cancer. Given that mortality data for three key factors (COPD, lung cancer, cardiovascular disease) indicates that Sydney Area Health Service has rates higher than the average NSW rate for all three, is it possible that this project is again ignoring the potential health impacts of a project that independent experts predict will increase total traffic pollution over time.

## 7.6 Flaws in the assumptions on which EIS health findings are based

- The health risk assessment does not take into account the possibility of total higher traffic along Parramatta Road than the WRTM forecasts. An Australian Government Department of Infrastructure and Transport Research (2012) report into traffic growth in Australia shows that traffic per person in Australia has grown steadily between 1965 and 2011. The measure of traffic volume (number of vehicles x distance travelled = vkt) in all states and major cities for this period indicates that the pattern of increases has been consistent, with only minor changes in response to petrol price rises, unemployment and the global financial crisis. Forecasts of future growth in traffic volumes indicate that traffic in Australia will rise from 55 billion vkt per quarter in 2011 to more than 65 billion vkt per quarter in 2020.
- There is no reason to believe that traffic volumes on the surface of Parramatta Road will decrease after 2021, especially with the anticipated population growth in Sydney, including in Inner Western Sydney. The traffic studies on which the air quality data assessments are based does not take into account Urban Growth plans to build more than 40,000 apartments in Parramatta Rd. Given that this EIS shows that levels of PM2.5 and NO2 are already elevated in parts of this corridor, it is obvious the project is designed to take current volumes of traffic off this road so that high-density residential development can be enabled even in the face of currently known health risk factors. **This is a huge gamble with people's health.**

## **8 The project negatively impacts a significant number of people**

The claim of Mike Baird recently “that a few are compromised for the benefit of millions” is a misrepresentation of fact.

The footprint of just the M4 East is near 300,000 and 64,000 workers. My estimate across the entire 33Km and the SouthConnex (F6) is close to a million people that will be significantly and adversely impacted permanently.

Impacts are many and varied. The main ones

- Construction close to their homes with visually divisive structures supporting the motorway.
- Living within the 2km spew of unfiltered toxins from the exhaust stacks.
- Locked into their suburb due to gridlocked local roads.
- their children play sport on fields or go to school located near an unfiltered exhaust stack
- Loss of parks, trees and greenspace

Others further afield are

- impacted by the perpetuation of being car dependent with money deployed to a motorway rather than investing in public transport connectivity
- forced to pay high tolls where no public transport alternative is available

I strongly object that a significant number of people are impacted by this project, and falsely downplayed by the NSW Government as a ‘just a few’.

## **9 The project fails in applying an appropriate solution to a 21<sup>st</sup> century problem of congestion**

The stated justification for the project is based on the discredited ‘predict and provide’ approach to transport planning, whereby it is assumed that transport demand will continue to grow, and that capacity must be increased to accommodate it. In practice, transport demand in cities is limited by capacity: as capacity increases, so does demand (induced demand). It is geometrically impossible to provide enough roadway capacity to accommodate all the latent demand for driving (i.e., where everyone can live and work where they want, and make all the driving trips they want, when they want, to wherever they want in free-flow traffic) in a city of Sydney’s population.

Furthermore, the most efficient way to accommodate the transport and accessibility needs of a growing population is through mass transit and better land use-transport integration. Urban motorways are a very inefficient way of moving people around. A single traffic lane can transport a

maximum of only 2000 people per hour (in ideal conditions); a single railway line can transport 20,000 people per hour.

The statement “It is acknowledged that any investment in motorway infrastructure has to be aligned with supporting public and active transport initiatives to achieve an increase in capacity, while aiming to reduce the reliance and demand of private vehicles on the future road network” is contradictory: increasing motorway capacity will only serve to increase private vehicle demand.

The EIS does not consider the cumulative costs of adding more urban motorways to those previously built through the heart of Sydney since the 1950s. Although the economic, social and environmental costs of each individual motorway (as reported in an EIS) may be considered by some stakeholders to be acceptable, the cumulative costs are considerable:

(a) Following decades of road expansion and consequential sprawl, Sydney now spends about 13% of its GDP on transport, while the average European or Asian city spends only between 5% and 8%.<sup>1</sup> (1)

(b) Serious human health impacts due to petrochemical vehicle emissions/smog, including:

i) Lung cancer,

ii) Asthma,

iii) Heart disease,

iv) Impaired lung development in children living near motorways/exhaust stacks.

(c) Waterways contaminated with road runoff (heavy metals and carcinogens in brake and clutch dust, exhaust particulates etc.).

(d) High traffic crash costs (of deaths/traumatic injuries and material damage).

(e) Urban sprawl and increasing commuting distances.

(f) Social isolation for non-drivers living in car-dependent suburbs.

(g) Noise pollution from traffic and its impacts on sleep.

(h) Impacts on visual amenity (pollution stacks, concrete interchanges, concrete flyovers).

(i) Extreme summer temperatures (urban heat island effect).

(j) Community destruction and severance.

(k) Destruction of heritage.

(l) Less incidental physical activity from walking and cycling (including to/from public transport), resulting in higher rates of obesity, diabetes, cancer and heart disease.

(m) Increased chauffeuring burdens for parents and carers.)

(n) Less independence for children.

(o) High per-capita greenhouse gas emissions.

## 10 The project contributes to carbon emissions

A shift from car-centric transport to one based on public transport, walking and cycling can reduce carbon dioxide emissions by 40%, according to a report by the Institute for Transportation and Development Policy and University of California.

“Transportation, driven by rapid growth in car use, has been the fastest growing source of CO<sub>2</sub> in the world, said Michael Replogle, ITDP’s managing director for policy and co-author of the report. “An affordable but largely overlooked way to cut that pollution is to give people clean options to use public transportation, walking and cycling, expanding mobility options especially for the poor and curbing air pollution from traffic.”

“The analysis shows that getting away from car-centric development will cut urban CO<sub>2</sub> dramatically and also reduce costs, especially in rapidly expanding economies,” said report co-author Lew Fulton, co-director of NextSTEPS Program at the Institute of Transportation Studies at UC Davis. “It is also critical to reduce the energy use and carbon emissions of all vehicles.”

**Given that climate change is real, and every county must endeavour to reduce emissions significantly, the WestConnex project is not best practice. I therefore reject this project in its entirety.**

## 11 The project will be responsible for poor Air Quality

### 11.1 Key Summary:

- this Air Quality Impact Statement relies too heavily on the WestConnex Road Traffic Model (WRTM) forecast of reduced traffic on Parramatta Road for its claim that there will be negligible impact on the overall air quality in the vicinity of the WestConnex project; in what should have been an independent study, this Statement needed to model a fuller range of traffic scenarios for the corridor, including possible "rat runs" used to avoid tolls and thus changing the air quality at those points
- the fact that the Parramatta Road corridor has numerous traffic "hot spots", where levels of dangerous pollutants are already elevated, is glossed over, and the dangers of adding to these "hot spots" and creating more of them is not taken into account by the overly conservative (ie optimistic) induced traffic forecasts
- there has been no modelling of estimates for any pollutants in a scenario where the traffic on Parramatta Road is more than the modelled forecast of a "53% reduction" (by 2021) along the Concord to Haberfield section.
- other cleaner forms of transport have not been compared, ie no cost-benefit analysis has been included
- the EIS Statement makes no mention of the possibility of phasing out diesel fuel passenger vehicles as one way of assisting with the problem of elevated levels of PM<sub>2.5</sub> and NO<sub>2</sub> in the corridor
- the monthly data reports – show there are several days where the PM<sub>2.5</sub> (24-hr average) is exceeding the current NEPM standard (25ug/m<sup>3</sup> for 24-hr average). Given it is a 24-hr average, what can we only imagine some of the higher readings are during peak-hour traffic??

- If the NEPM new standard (20ug/m<sup>3</sup> for 24-hr average ) is adopted in the near future, there will be a lot more exceedances, even before more traffic is generated along the corridor by WestConnex

## 11.2 Key findings from the EIS report

- the contribution of tunnel ventilation to pollutants is calculated as negligible for all receptors (ie locations where pollutants were measured)
- there will be general improvements in air quality along Parramatta Road as a result of the project, due to reduction in traffic along the road and improved dispersion of emissions from diverted traffic through tunnel ventilation outlets
- predicted concentrations of pollutants are dominated by existing background levels, both short-term readings and longer-term readings; with background concentrations particularly dominant for PM<sub>10</sub> and PM<sub>2.5</sub>
- whilst exhaust emissions from some pollutants from road transport have decreased as legislation has tightened, over the longer term levels will start to rise again as increases in annual vehicle activity begin to offset reductions achieved by legislation and improved technology
- there are no controls or legislation for non-exhaust particles emissions, which are significant in Sydney and these will increase as vehicle activity increases
- the NSW Office of Environment and Heritage (OEH) Sydney Basin air quality monitoring stations are collecting data on PM<sub>2.5</sub> from 3 out of 7 sites (Vol 2B, part 6, Appendix J, Table F2); the three sites show both annual mean PM<sub>2.5</sub> concentrations and maximum 1-hr concentrations are above the advisory reporting standards of 25ug/m<sup>3</sup> and 8ug/m<sup>3</sup> (respectively)
- time-series for PM<sub>2.5</sub> only available at Chullora and Earlwood; there are considerable uncertainties in measurement of PM<sub>2.5</sub> (but has been more accurately measured since 2012 - using USEPA-equivalent monitoring)
- long-term mean nitrogen oxide concentrations at the RMS roadside sites (F1, M1 = Flat Rock Rd Kingsgrove, M5E tunnel portal) substantially higher than at the background sites at 106 and 107 ug/m<sup>3</sup>; "illustrates the ongoing contribution of NO<sub>x</sub> emissions from road transport" (Vol 2B, part 6, Appendix J, Table F2, p F-12)
- long-term trend in NO<sub>2</sub> shows some background decreases at OEH sites, but increases or no change at several RMS urban background sites
- the ambient air quality in this part of Sydney has PM<sub>2.5</sub> levels well above the advisory standard for both 24-hr (25ug/m<sup>3</sup>, moving to 20ug/m<sup>3</sup>) and annual (8ug/m<sup>3</sup> moving to 7ug/m<sup>3</sup>) concentrations, judging by the readings at Edward Street Concord and the Bill Boyce Reserve Homebush and the levels at the 31 community receptors (Table K-47, p K-83). **The modelled data of forecasted PM<sub>2.5</sub> increases and decreases shows one locality is traded against another. The top 10 ranked receptor readings, 2014 (Table K-47, pK-83) for annual mean concentrations show a range from 14.1 ug/m<sup>3</sup> to 12.5ug/m<sup>3</sup> (all well above the advisory standard of 8ug/m<sup>3</sup>), with the "do minimum" and "do something" scenarios still showing modelled data above the advisory standard. With the completion of all stages of the project by 2031, these modelled**

**readings are still above the advisory standard and will be well above the recommended new standard of 7ug/m3 (to be adopted possibly by end of 2015)**

- the top 10 ranked receptor readings, 2014 (Table K-51, p K98) for maximum 24-hr concentrations show a range from 26.5ug/m3 to 24.3ug/m3 (all above the advisory standard of 25ug/m3) with the "do minimum" and "do something" scenarios still showing modelled data above the advisory standard. With the completion of all stages of the project by 2031, these modelled readings will still be above the new advisory standard (20ug/m3)

### **11.3 Flaws in the methodology of the EIS report**

- relies on the traffic modelling for its claim receptors will, generally, be improved - this traffic modelling did not include a scenario where traffic on Parramatta Road is greater than model estimates
- the WRTM traffic forecasts rely on the Bureau of Transport Statistics (BTM) population model, which uses the main inputs from the Department of Planning and Environment's (DP&E) 2014 NSW population, household and dwelling projections and Australian Bureau of Statistics' (ABS) 2011 Census data on population and dwellings. The model makes adjustments to incorporate known major developments and future plans. Given that the EIS uses BTM data from 2013, before the Parramatta Road Renewal Plan was released, the model may not allow for an estimated additional 40,000 units (80,00 - 100,000 people) along the Parramatta Road corridor, most of whom will own at least one vehicle.
- the estimations for "induced demand" in traffic (claimed as between 2%-7% - Vol 2A, Traffic and Transport Assessment, p4-6) are very conservative, given they rely on population forecasts which may underestimate population growth along the corridor (collected prior to the Parramatta Road Renewal Plan)
- the planned height of the ventilation stacks is not modeled to show other scenarios, including effects of greater heights on dispersal of pollutants; there is a lot of international research that indicates a greater height of stack results in better dispersion
- the model claims the data from the OEH monitors and the WDA St Lukes Park Concord (M4E:05) is representative of the air quality of the project; the data from the other 4 WDA (road-side) monitoring sites is down-played, yet there are currently many residents living within 200-300 metres of these "hot spots"
- the statement seems to downplay the key findings from the Human Health Risk Assessment (Volume 2D, Appendices J-L) including:

*by 2021, without the project, the maximum (residential and commercial) 1-hour concentration of NO2 estimated to be (in micrograms per cubic metre) 375ug/m3 and 360ug/m3 (respectively) - which is well above the guideline (of 246ug/m3); with the project completion, the levels estimated as 307ug/m3 and 286ug/m3 (respectively) - still well above the guideline*

*by 2021, without the project, the maximum (residential and commercial) 24-hr average concentration of PM2.5 estimated to be 29.3 ug/m3 and 30.5ug/m3 (respectively) - which is significantly above the*



*guideline (25ug/m<sup>3</sup>); with the project completion, the levels estimated as 28.2ug/m<sup>3</sup> and 26.6ug/m<sup>3</sup> (respectively)-still above the guideline*

*by 2031, with the project, PM<sub>2.5</sub> levels estimated as above the guideline*

*by 2021, without the project, the maximum (residential and commercial) 24-hr average PM<sub>10</sub> concentration estimated as 54ug/m<sup>3</sup> and 55.4ug/m<sup>3</sup> (respectively) - above the current guideline (50ug/m<sup>3</sup>) and well above the recommended (from the 2014/15 review) of 40-50ug/m<sup>3</sup>*

*by 2021, with the project, the maximum (residential and commercial) 24-hr average PM<sub>10</sub> concentration estimated as 52 ug/m<sup>3</sup> and 50ug/m<sup>3</sup> (respectively) - above both the current guideline and recommended (review) guideline*

*by 2031, both without and with the project, PM<sub>10</sub> will be above both guidelines*

- the claim there will be no emissions from portal sites is questionable, given that any congestion on the feeder road into a portal entrance or the exit point will produce concentrated sites of emissions
- Bureau of Metereology data from Canterbury Racecourse is used to model the atmospheric conditions for dispersion of the plume at Wattle Street Haberfield; this may not be appropriate, given the location of the very large Parramatta River to the East of the stack and thus different terrain compared to Canterbury; more suitable local data should have been collected for such a major project

### 11.4 Flaws in Model's Assumptions

- the benefits from the project, in terms of some reduced pollutant concentrations at particular points (as shown on contour maps (Fig K-98, K-99, K- 100), depend on completion of stage 3 of the project, which may not eventuate if tolling of stage 1 does not meet estimated revenue. **If stage 3 is not completed, the levels of PM<sub>2.5</sub> throughout many parts of Haberfield, Ashfield and Leichhardt will exceed current advisory and new standards.**
- the overall benefits rely on the traffic on Parramatta Road being significantly reduced, as claimed in the EIS. The WRTM traffic model depends on the BTR population forecasts (which use ABS Census of Population & Housing data) and the toll-resistance modelling estimations. Traffic forecasting is a major issue in Australia, given the number of projects with significantly incorrect forecasts of volume, including the Brisbane N-S By-Pass, Sydney Cross City Tunnel, Brisbane Connections, Lane Cove Tunnel and East-Link Melbourne. As the Australian Bureau of Transport and Communication Economics, Canberra states, traffic models are ... "radical simplifications of real urban systems" (cited in Black, J (2014) Traffic Risk in the Australian Toll Road Sector, Public Infrastructure Bulletin, Vol 1, Issue 9, Art 3). **So all the claims of improvements in overall air quality, or at best negligible impacts on air quality, are reliant on the accuracy of the traffic modelling.** As Black (ib id, p5) shows, the eight most recently built toll-roads in Australia have all had significant underestimation of traffic volumes by an average ratio of .48 (total traffic

from the 8 projects forecast as 945,286 vehicles, but actual volume was 455,939 vehicles). The WDA must be very optimistic that this project will be the first one in many years to get the traffic forecasts correct. The problem is that local residents lives are about to be severely interrupted and possibly have the air quality worsened if this project attracts more traffic than estimated onto the surface roads, particularly Parramatta Road. Following a review of local and international reports and data, the Australian Department of Infrastructure and Transport, Bureau of Transport and Regional Economics (BITRE) in its Review of Traffic Forecasting Performance Toll Roads (2011) sets out what it sees as the major sources of errors in toll road forecasting. These errors include both technical (inadequate models, data limitations, unrealistic model input assumptions and ramp-up risk) and non-technical (optimism bias and strategic misrepresentation) sources of errors. Given that the Project Manager of the WDA stated at an Ashfield Council Forum (23/09/2015) that a key element of the business case for the project is .."as an enabler for the Parramatta Road Renewal Plan", one would have to wonder whether the traffic forecast that the M4 will reduce surface traffic on Parramatta Road by 53% by 2021 is an error of misrepresentation (to cite the BITRE classification of errors). The robustness of the WRTM model is crucial to the claims that the air quality will not be adversely affected by the project, and this Air Quality Report should have included a worst-case scenario of more than projected traffic on Parramatta Road.

- this assessment ignores the fact that the air quality standards or guidelines used in the EIS may be superseded by stricter ones at the end of 2015 when the new National Environment Protection (Ambient Air Quality) Measure (NEPM) standards are passed
- this assessment appears to ignore some of the actions recommended in the new National Clean Air Act, including initiatives to reduce localised emissions.
- Ozone is unlike most other pollutants in that it is not directly emitted from anywhere. Rather it forms in summertime if the sun is strong enough and there's enough nitrogen dioxide around.



**This WestConnex project will not only increase levels of NO<sub>2</sub> and PM<sub>2.5</sub> at several community receptors, it also runs the risk (if estimated traffic flows are greater on Parramatta Road than predicted) of increasing these levels across the Corridor. Accordingly, I strongly object to the entire WestConnex project.**

## **12 The Heritage Department says WestConnex is not worth it**

Recently, the National Trust of Australia (NSW) Advocacy Director Graham Quint made a submission to the Westconnex M4 EIS process. The National Trust (NSW) objects to the destruction of so much heritage and argues that the Westconnex motorway system is a flawed policy that does not justify the loss.

The submission begins by reiterating a few points drawn from its February, 2014 submission to the WestConnex Delivery Authority M4 concept design.

- It concerns the Trust that, at the Environmental Impact Statement assessment stage of this massive project, contracts may already have been signed and commitments made to commence construction when the full impacts of the development may only be coming to the public attention.

- Over the past fifteen years the Trust has continued to express concern at the heritage impacts of inner urban motorway proposals and has supported mass transport options such as light and heavy rail in preference to inner urban motorways.
- While acknowledging that the increased mobility and affluence of our society and an expanding population require much improved transport facilities, the National Trust opposes further motorways being brought into the inner suburbs and central business district if they threaten areas of historical, architectural, scenic and social importance.
- The National Trust believes that the provisions of public/private partnership agreements for urban motorways should be made public and that such agreements must not contain penalty provisions for compensation payments to a motorway operator if a public transport system competes effectively with the motorway.
- The National Trust would oppose public/private agreements that disadvantage the public who do not choose to use the toll roads constructed under those agreements and believes that massive expenditure on motorway development will divert much needed public and private investment away from public transport development which can move large numbers of people more effectively and with much less adverse heritage impact.
- The constant daily movement of large transport trucks severely degrades the urban environment and the National Trust urges that rail transport should be the preferred means for transporting container goods related to Port Botany and Sydney Airport. The Trust would oppose motorway proposals which promote increased large truck movements through urban precincts, particularly those with heritage significance.
- The National Trust acknowledges that inner city motorway development will be inextricably linked to residential/commercial redevelopment of higher densities in the zones adjoining the motorway and consequently, would oppose such development, or elements of that redevelopment when it: –
  - impacts upon, or degrades the values of adjoining, Heritage Conservation Areas
  - involves the demolition of Listed Heritage Items
  - involves the demolition of places which have been removed from Heritage Lists on non heritage-based grounds
  - involves the demolition of places which, in the Trust's view are of indisputable heritage significance, but which have been denied statutory heritage recognition.

## **12.1 National Trust history in campaigning with community**

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

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

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

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

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

1. While acknowledging that the increased mobility and affluence of our society and an increasing population require much improved transport facilities, the National Trust will oppose further motorways being brought into the inner suburbs and central business district if they threaten areas of great historical, architectural, scenic and social importance.
2. The National Trust will oppose the loss of public parklands for inner urban motorway construction, including both permanent loss involved with a motorway route/connection ramps or shorter term alienation during the construction phase.
3. The National Trust believes that the provisions of public/private partnership agreements for urban motorways should be made public and that such agreements must not contain penalty provisions for compensation payments to a motorway operator if a public transport system competes effectively with the motorway.
4. The National Trust would oppose public/private agreements that disadvantage the public who do not choose to use the toll roads constructed under those agreements.

5. The National Trust believes that massive expenditure on motorway development will divert much needed public and private investment away from public transport development which can move large numbers of people more effectively and with much less adverse heritage impact.
6. The National Trust believes that the constant daily movement of large transport trucks severely degrades the urban environment and will urge that rail transport should be the preferred means for transporting container goods related to Port Botany and Sydney Airport. The Trust would oppose motorway proposals which promote increased large truck movements through urban precincts, particularly those with heritage significance.
7. The National Trust acknowledges that inner city motorway development will be inextricably linked to residential/commercial redevelopment of higher densities in the zones adjoining the motorway and consequently would oppose such development or elements of that redevelopment when it;
  - impacts upon or degrades the values of adjoining Heritage Conservation Areas,
  - involves the demolition of Listed Heritage Items, involves the demolition of places which have been removed from Heritage Lists on non heritage- based grounds,
  - involves the demolition of places which, in the Trust's view are of indisputable heritage significance but which have been denied statutory heritage recognition.

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

### **12.3 Listed Heritage Items to be demolished**

- 11 and 23 Sydney Street, Concord, Rare examples of Victorian houses in Canada Bay
- 64 Concord Road, Concord, example of transitional Victorian/Federation house
- 9 Wattle Street, Haberfield, an example of John Spencer-Stansfield's Design No 1
- 19 Wattle Street, Haberfield
- 21 Wattle Street, Haberfield
- 23-25 Wattle Street, Haberfield
- 35 Wattle Street Haberfield
- 37-39 Wattle Street Haberfield
- 41-43 Wattle Street, Haberfield

- 51 Wattle Street, Haberfield
- 53 Wattle Street, Haberfield
- 46 Martin Street, Haberfield
- 164 Ramsey Street Haberfield.
- 92-94 Chandos Street, Haberfield
- 96 Chandos Street Haberfield

Potential Heritage Items to be demolished

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

Properties proposed for demolition within the Haberfield Conservation Area

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

Properties proposed for demolition within the Powells Estate Conservation Area

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

Partial demolition with major consequences

- Wesley Uniting Church, 81 Concord Road



## 12.4 National Trust Conclusions

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

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

Back in the 1970's – workers refused to demolish 'those old buildings at the Rocks'. These historic buildings are an icon and asset to our Sydney. It is the same with the inner suburbs across the 33km. this is our history. It is gobsmacking that WestConnex project has been proposed with such a significant loss as a result.

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

## 12.5 Alexandra Canal – heritage importance

**The Alexandra Canal is also at risk by the WestConnex project – yet another piece of our history likely to be destroyed.**

Alexandra Canal is of high historic, aesthetic and technical/research significance. Historically, it is a rare example of 19th century navigational canal construction in Australia, being one of only two purpose built canals in the State, with one other known example in Victoria. It has the ability to demonstrate the NSW Governments initiative to create water transport as a means of developing an industrial complex in the Alexandria and Botany areas and exploiting the use of unemployed labour to achieve its scheme.

It played a seminal role in the changing pattern and evolution of the occupation and industrial uses of the local area and nearby suburbs, which included filling large areas of low lying land for development.

Aesthetically, intact original sections of the canal, comprising pitched dry packed ashlar sandstone, provides a textured and coloured finish which is aesthetically valuable in the cultural landscape. It is a major landmark and dramatic component of the industrial landscape of the area, particularly as viewed from the Ricketty Street Bridge and along Airport Drive.

Scientifically, the excavation of the canal provided a valuable contribution to the understanding of the changing sea-levels along the eastern seaboard and the antiquity of the aboriginal presence in the area. Intact original sections of the fascine dyke sandstone construction are rare examples of late 19th

century coastal engineering works.

**I object to the WestConnex project in its entirety, due to the destruction of our heritage for what is a wasteful project that fails to achieve any of its stated objectives.**



Haberfield Westconnex Action Group and Save Ashfield Park protesting against heritage destruction in October 2015

## 13 People's stories

### 13.1 Willows Nursing Home

According to the GHD EIS Social Impact report, at least five aged care facilities including hundreds of beds lie near the path of the M4 East.

Residents of aged care facilities or their families try to choose the best environment for their final home. High on their list of physical priorities are peace and quiet, a bright outlook and easy access for visitors.

Aged care facilities are both a home for residents and a business. While the EIS economic impact statement did not conduct any consultations with other businesses, ‘social infrastructure’ organisations such as churches, schools and health care facilities were asked for feedback and nearly all told Westconnex of their concerns.

The Willows Nursing Home was no exception. The GHD report records its many objections including noise, pollution and dust and anxiety about how visitors and staff would access the home both during construction and afterwards.

This is because if the M4 East was to proceed along the planned route, Willows Nursing Home would literally be in the middle of a construction zone and later next to the tunnel exit and unfiltered ventilation stack.

**I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.**

### **13.2 People’s EIS interview with Sass Inbari.**

Sass Inbari has owned Willows Private Nursing Home on Orpington Road, in Ashfield, since 1977. It was his father’s before that and Sass built it up from 27 beds to 40. The home provides high care support to its elderly residents, and welcomes visitors from 8.00 am to 8.00 pm daily.

The Westconnex GHD social impact study notes that as a high care residential facility “the impacts of vibration and noise could be detrimental to health and wellbeing of residents.”

Sass is concerned about the noise and dust occasioned by the demolition of the buildings immediately behind and next to the nursing home. Later there would be more disruption when this emptied space would be occupied as a construction site for the motorway and a parking lot for hundreds of large diesel trucks that will move in and out of the site each day.

The residents at the Nursing Home are frail and vulnerable. Staff are also upset and it will be a major inconvenience with road closures and works for relatives coming to visit, ambulances, delivery etc.

Bus stops on Parramatta Road are going to be moved, which means it will be harder for relatives to visit the residents.

Sass first heard about the Westconnex motorway on the news like everyone else, then about 3 or 4 months ago he got a visit from Westconnex representatives to discuss his concerns. “They took it all on board but I have not heard from them since,” says Sass.

He wants compensation because of the impacts of the construction and of the operation of the motorway, and he is worried he is going to loose business.

He is angry too as he says he doesn’t “know what good the Westconnex is going to do. All it will do is just shift the bottle neck towards the city.”

He doesn’t think people realise what impact the motorway will have.

All the other businesses around him, on Paramatta Road, have been purchased. Sass doesn’t wish to be purchased, only compensated. He is stressed and frustrated as he feels there is nothing he can do to change the situation

**I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.**

### **13.3 This is the story of Kevin**

### **13.4 Impact on Residents by Westconnex**

WestConnex was required to include a social impact study in the EIS. This is [Appendix M](#). The NSW Planning Department required that this section of the EIS should report on the impact of the M4 East on communities from planning through to operation of the WestConnex. GHD was hired to work alongside AECOM to produce the social impact study. According to its website, GHD is a global services company that operates in the “markets of water, energy and resources, environment, property and buildings, and transportation.” It provides, “engineering, architecture, environmental and construction services to private and public sector clients.” It is not a specialist in social impact studies.

People’s EIS caught up with GHD consultant Anne Mithieux at a Strathfield EIS exhibition session in September. She explained to us that GHD did not interview any people whose houses were being acquired directly which probably explains why her impact study contained very little detail and described the stress and disruption that is already occurring along the M4 route as if it was a future

event. She saw her task as recommending mitigation for the impacts of a project that was going to happen. (This is the sort of attitude that is fueling critics' apprehension that the Planning process is a set up.) She was not uncaring but is not very familiar with the area she was studying. She seemed a little surprised about the intensity of the impacts that were already happening.

Two weeks ago, the ABC [interviewed Arthur Alibrandi](#) who told the ABC News that his 82-year-old father, Joe who has lived in his unit for nearly 50 years, had been offered an amount by WestConnex that would make it "physically impossible" for his elderly father to stay in the area.

In response, Premier Baird told the ABC, "At times, there has to be a provision for the majority, there are difficulties for some people as part of that... We're doing everything we can in terms of compensation, looking after them, provide provision for a new home."

**This statement reveals a similar detachment and apparent lack of knowledge on the part of the Premier.** According to the SMH, Slater and Gordon Lawyers, who are representing about 70 property owners affected by WestConnex compulsory acquisitions have found that offers are 20-50 per cent below what clients' properties are worth. This means that residents quite unexpectedly are not only losing their homes but feel they have lost control over where they can live altogether.

**I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.**

### **13.5 Kevin : another story from Underwood Road**

Kevin and Ann (not their real names) are both in their eighties. Five years ago, they moved to Homebush, a community along the M4 route that will be hit hard by the WestConnex.

Initially, Kevin wasn't bothered by the WestConnex because according to earlier plans, it would have bypassed his home. But in June this year, he was told WestConnex would compulsorily acquire his home and he and Ann must move out by April. As anyone who lives in Sydney would know, nine months is not nearly enough time to unexpectedly sell and find another home.

When Kevin and Ann moved into their home five years ago, they expected to stay there for the rest of their lives. They had specifically chosen the house because it had no stairs, was walking distance to the train station and shops, and in a quiet street.

When interviewed for the People's EIS this week, Kevin said,

“I am very unhappy about the WestConnex. I can’t find anywhere to replace my house. I am very old, in my 80s, so I thought the place where we are living at the moment, is our home. But I can’t find anything to replace the house that is near the station and the grocery shops. There were a few houses on the market, but they are too expensive. There is no way to get one of those houses, with the money I get from our house.”

**“They’re going to acquisition it, they’re going to buy it by force.”**

The situation is “very stressful. Particularly for aged people like me.” He describes the search for a replacement as a “nightmare” that may have “shortened my life expectancy”.

He laughed when asked if WestConnex had been helpful. “No. Just one way instructions.”

**“WestConnex is not helping to find a new house. It did a valuation and that’s it. The amount from WestConnex may be fair, but I can’t find anything to replace the house with the money from WestConnex.”**

**I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.**





96 year old

resident Ray Harrison lives close to what could become a massive construction site for the tunnel exit and ventilation stack. He has been regularly protesting on the streets of Haberfield

### **13.6 WestConnex GHD report warns of serious risks to residents, especially vulnerable ones**

The GHD report did find that the acquisition process could carry ‘significant social risks’ (Appendix M, p. 96)... including ‘inaccessibility of equivalent housing at a comparable cost...relocation health risks...[and] altered access to social infrastructure’ as well as potential housing stress due to higher rent or house costs. It is ‘expected that the majority of



owner-occupiers would aim to relocate within the local area', and effects may be compounded by the timeframe of just 9 months for some households to be relocated, market volatility and reduced housing stock available to relocate into (Appendix M, p. 68).

It also noted that the "stress and anxiety" could lead to "impacts on health, well-being and quality of life, which have been worsened by the uncertainty and the changing footprint of the project with some dwellings originally to be acquired now not, and some originally not impacted now required for the project (Appendix M, p. 68)."

It found that the impacts would likely impact vulnerable households but that even less vulnerable households would be affected as "land acquisition would increase property demand in the local area with some households with only nine months to identify alternate properties". (Actually it is less than nine months for Kevin as some property owners have been told they must be out of their houses by April next year.)

"Overall it is anticipated that the social impacts of relocating for many of the directly affected households would be **major short-term impacts**. In some cases, where households are unable to relocate locally, the social impact may involve an extended recovery time to re-establish social networks and daily routines for work, study and recreation. Alternatively, where households need to incur higher levels of debt in order to remain in the local area, increased mortgage or rental stress may result in greater and longer term social impacts."

Short term impacts are defined as between 1 and 3 years. (Appendix M p. 23). Major impacts are substantial ones that the report states could be mitigated, although it does not explain how this might happen after residents are forced out, which is in the process of happening at the moment. So for older people this could be very serious. The stress and forced relocation could shorten their lives, particularly for those who do not have strong family support networks.

Given the lack of any in depth or direct investigation by GHD, it is disturbing that the consultant repeats and appears to accept the word of WestConnex at face value. On page 87, GDA reports:

WDA is also providing an independent service to vulnerable households (e.g. elderly, those suffering an illness) to help assist with their relocation. This service aims to provide assistance with tasks such as finding a new property (either to rent or purchase), arranging

removalists, disconnection of services (electricity, gas etc.), attending appointments with solicitors and other tasks associated with relocating. With nine per cent of people in the region over the age of 70 years and 4.6 per cent needing assistance for their daily needs, this support will be imperative to mitigating relocation disruption.

On the basis of this statement, the report concludes that “minimising dislocation of affected households from their existing socio-economic networks is a key consideration in avoiding social risks to those affected by property acquisition.”

### **13.7 GHD report out of touch with residents’ experiences**

While the WDA statement quoted in the GHD report does represent the official version of what is happening, it doesn’t represent what residents would have told the consultant had they been asked. The problem is that with five months to go until they empty their homes and move to new houses, residents such as Kevin claim that support is simply not there.

WestConnex Action Group Haberfield spokesperson Sharon Laura told the People’s EIS, “I hope those who are currently in the process of trying to negotiate just terms for the loss of their homes are not panicked into accepting what is first on offer by WestConnex/RMS.” She recommended that residents negotiate hard [like Aurelia](#) to get the best deal – and not leave their current home until they have found a suitable replacement for the home and community they are losing.

“In Haberfield and Ashfield, there are owners and tenants, who have received their PANs (notice to settle on agreed price, either as an owner or tenant), and who are being hassled to leave their homes before Christmas. Many have no idea of where they will re-locate. Some, who may have been offered a ‘good price’, say that even with this, they cannot afford to purchase or rent back in Haberfield or Ashfield. So much for ‘just compensation’ and a just process of acquisition. Money provides no ‘just compensation’, when a person or family is forced out of their community against their will, and in an such and untimely manner. Why should anyone leave until they are ready and have got something decent to move into?”

The WestConnex Action Group rejected Baird’s assurances that the government is doing all it can to support people and called for a halt to forced acquisitions.



Aurelia's

96 year old neighbour Richard reading EcoTransit Sydney newspaper

There are also serious impacts for residents living in aged care facilities and for tenants who may find it impossible to find or afford comparable accommodation in their home suburb

**I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.**

For many, working to own your own home is an important part of life in Sydney, although it is increasingly unlikely for younger residents due to rising house prices. People work hard to meet expectations. The least they expect is that when it comes to the ownership of their home, they will be treated fairly.

The picture emerging is far from what Premier Mike Baird called "doing everything we can in terms of compensation, looking after them, provide provision for a new home" or the low key distanced tone of the Westconnex GHD Social Impact study

But you don't have to be old to be severely affected by the threat of losing your home for less than its value, especially when you call Westconnex's so called free counselling service and they don't ring back.

### **13.8 The is the story of Kim Sun who home at 21 Young Street will be smashed for Westconnex:**

For the past few months, Kim Sun has spent almost every weekend attending auctions and open home inspections in and around North Strathfield. He is desperate and stressed as house prices are way above what he can afford.

The thing is, Kim and his wife already own a lovely home debt free in North Strathfield, which they have renovated bit by bit since buying it in 2006. They've added insulation, solar power and a water tank as they expected to stay in it a lot longer. Their six year old son rides his scooter with his dad to the local school and his grandmother lives a 5 minutes drive away in same suburb.

But in November 2013, Kim received a letter from the WestConnex Delivery Authority (WDA), informing him his house was to be acquired to make way for the motorway. It was the first he'd ever heard of the WestConnex. The family must now vacate by March next year, but Kim says WestConnex will only buy their house at nearly \$200,000 less than market value.

"The price Roads and Maritime Services offer means we can only buy a home very substandard to the one we are living in. And time is running out. " says Kim.

"It's not right. It should be market value. That's what they say they are offering, and it's not. They are not doing the right thing by people. Considering the project is going to cost \$15.4 billion, and they need our place, and they are stressing us out, why put on that extra pressure of offering below market value."



Kim Sun's has been forced to sell his house to RMS at below market value

“It’s a difficult situation too for me because my wife doesn’t work, she looks after my son and the house. I am the only one working, so it makes it a bit difficult having to borrow extra money to find a place, so we can stay within the area, with what they are offering.”

Kim says it’s the same for everybody on their street: “We all seem to have a problem with getting the market value.”

He knows others who have had to move to the Central Coast after their house was acquired, but that’s not an option of the Sun family. “I don’t want to change schools for my son, he likes it there, and mum is close by. I don’t want to go somewhere else,” says Kim, who catches a train from North Strathfield station or Strathfield station into work at Town Hall. “We were hoping to stay here a long time, which is why we set the house up comfortably.”

The past two years of negotiations and uncertainty have taken their toll. Kim is struggling with stress and is on antidepressants. It’s a situation made worse by a lack of communication from the WDA. “I’ve tried to call WestConnex myself, but they don’t return calls,” says Kim, who has kept a log of these calls, having been assigned a ‘job number’ for each. He feels “extremely disappointed and stressed” with the way WDA has treated his family.



In July this year Kim called WestConnex wanting to know by when exactly the house had to be emptied, and also asked about accessing the free counselling service on offer. His call was never returned.

A young family, work and an ailing mother already make for a busy life, and Kim says the last thing he needed on top of it all is to be “kicked out of my home in such a short space of time now”.

Asked by the People’s M4EIS what he thought of Premier Baird’s comment about needing to make provision for the majority, Kim says: “ If I was losing my house to public transport I’d probably feel less hurt by it. I don’t think the WestConnex is going to solve our problems. For me public transport would be the way to go first. And I thought ‘market value’ was market value. I don’t see why we have to negotiate so hard with them.”

**I object to the WestConnex Project in its entirety, as the treatment of residents is an unacceptable. It is un-Australian.**

### **13.9 Snippets from ‘American Way’ interview with Jessie J (*The Voice*) about Sydney**

Speaking of adventure, Jessie says her newest discovery is an area called Newtown — best described as being the Sydney version of what Brooklyn is to Manhattan. Located two train stops from the city and bordered by the sprawling campus of The University of Sydney, the neighborhood is a little alternative with a touch of hipster chic and vintage cool thrown in for good measure.

One of her recommendations is in the historic Rocks area abutting the harbor at the northern end of the Central Business District. “The fact that you’ve got the Sydney Harbour Bridge, the Opera House and some great bars and restaurants all in the same area makes it very unique. There’s nowhere else in the world you could be in that moment.”

If she had to name one place in the city that is a nonnegotiable, it lies just across the harbor under the northern pylon of the Bridge.

“Luna Park is an old-fashioned amusement fair that’s lit up beautifully at night,” she says. “I feel a bit bad talking about it because it’s a place the locals adore and it’s got beautiful heritage architecture with a view across the water that is just beautiful. There is also a great live-music venue there, which I’ve actually played, so do a bit of research beforehand and you can actually catch a gig while you’re there.”

Ask any Sydneysider how they feel about this icon, and they’ll usually tell you it shines all the brighter the longer you look at it. Much like Jessie J herself

**I object to WestConnex in its entirety, as it will destroy heritage areas that are of interest to tourists, not to mention, of national interest. You can’t just destroy what is the essence of Sydney.**

## 14 Where does democracy fit in?

Prime Minister Malcolm Turnbull has created a new ministry for cities and the built environment. Announcing his decision last month, he said:

“Liveable, vibrant cities are absolutely critical to our prosperity. (They are) where the bulk of our economic growth can be found ... (and they are) economic assets. (M)aking sure that Australia is a wonderful place to live in, that our cities and indeed our regional centres are wonderful places to live, is an absolutely key priority of every level of government. Because the most valuable capital in the world today is not financial capital ... (it’s) human capital”

The inner west and inner south is a wonderful center which is mostly people for walking – nearly 90% of people are walking at any one time, 80% of people get there by public transport. A metropolitan strategy based on walkability and public transport is exciting.

WestConnex is out of kilter. It is hard to believe that the NSW Government would have really wanted this in their array of strategic plans (it certainly was not part of the NSW Transport Master Plan 2012). Obviously – it was dropped from above aka (worst ever ) PM Tony Abbott.

We need to rethink how to plan to tackle Sydney’s congestion issues. Fifteen billion dollars (plus) is a very sizeable amount of money – let’s put it into that alternative future, because that’s where the competitive future is for Sydney, and it will give us a much more liveable city.

Let’s get serious about providing a better future for Sydney and throw wasteCONnex out.

**I reject WestConnex in entirety, as it has not been through the proper planning strategy. If proper protocols had been followed, such a pathetic project would not have seen the light of day.**

**The People of NSW have been deceived and misled by the proponents of the WestConnex motorway.**

## 15 Conclusion

I consider it extraordinary that the WestConnex project has progressed to the point of issuing contracts and PAN notices to residents – without following the required dNSW and Federal public money u Sw Connex project has progressed this far. A project that has not followed due project procedures. A project that has been shrouded in secrecy and unable to provide evidence that it is the right project for Sydney.



## 16 References

SydneyBliemer, M., & Beck, M. (2015). Myth: Roads are the solution to congestion. Paper presented at the Festival of Urbanism, Sydney.

Evans, R., Burke, M., & Dodson, J. (2007). Clothing the Emperor?: Transport modelling and decision-making in Australian cities. Paper presented at the State of Australian Cities National Conference, Adelaide.

Newman, P., & Kenworthy, J. (1999). Sustainability and cities: Overcoming automobile dependence. Washington, D.C.: Island Press.

Newman, P., & Kenworthy, J. (2015). The end of automobile dependence: How cities are moving beyond car-based planning. Washington, DC, USA: Island Press.

Odgers, J. (n.d.). Have all the travel time savings on Melbourne's road network been achieved? GAMUT Discussion Paper. Melbourne: RMIT.

SGS. (2015). WestConnex transport modelling: Summary report. Sydney: Commissioned by City of Sydney.