

Anthony McCosker

Bachelor Regional and Town Planning (Honours Class I), University of Queensland

PhD Candidate, Curtin University Sustainability Policy Institute

proofreading.service.online@gmail.com

Attn: Secretary, NSW Department of Planning and Environment

SSI 6307

GPO Box 39

Sydney NSW 2001

Re: SSI 6307 submission (WestConnex M4 East)

Objection to WestConnex M4 East EIS Proposal

I wish to register that I strongly object to the WestConnex M4 East proposal.

Please find attached my reasons for objecting to this EIS, relating particularly to the Social and economic chapter (Chapter 14), Appendix M and Appendix N:

- Of the 5 road or tunnel projects the SIA (see Appendix A within Appendix M) uses as precedents for SIAs of 'other similar projects', one has been cancelled prior to building (the East-West Link in Melbourne), and three have proven financially unviable (Brisbane's Clem7 and in Sydney the Lane Cove Tunnel and the Cross City Tunnel [which failed financially twice]). Consideration of this point is not made throughout the entirety of the EIS document.
- Just 30-40% of trips along the existing corridor during peak and business hours are for business purposes. This high level of other discretionary trips (60-70%) provides an opportunity for traffic demand management strategies to reduce congestion and increase efficiency without expanding the roadway. Though 'additional capacity is limited during peak periods', removing even a limited percentage of these discretionary trips, or having them change to off-peak use of the roadway, would remove the need for the M4 – East project (given that it is only a small percentage increase in cars that slows all cars from freely flowing to gridlock, the same is true for the reverse—given only a small decrease in cars on existing roads such as through public transport improvements cars that necessarily have to make the trip, as well as freight, could do so more efficiently).
- Also, 'A key element of this program [Parramatta Road urban renewal] is improved public transport services along Parramatta Road' – yet there is no reference to the effects of induced traffic on Parramatta Road in this section and no reference to any proof elsewhere in the document showing that this will happen.
 - The report takes a wider context (eight renewal strategies) for the benefit of the WestConnex case—'The Parramatta Road Urban Transformation Program is also planning for the construction and delivery of walking and cycling infrastructure in

key locations along the corridor' (Chapter 14, p. 17) whereas other planning considerations (for instance Ashfield 2023's vision to 'Reduce the reliance on public cars') are overlooked.

- There is an inconsistent assessment of level of impacts between the SIA (Appendix M) and EIA (Appendix N), and Chapter 14 Social and economic, raising concerns as to information left out of the 'main document' and included (essentially 'hidden') only in Appendices:
 - While seemingly significant heritage effects are identified in Appendix M and concerns raised by local councils regarding this, the only mention in the main document's Chapter 14 Social and economic comes briefly under 'Section 14.4.2 Changes in amenity' ('loss of heritage items and changes to streetscapes') and concerns brought up during community consultation (Section 14.1.4).
 - Health is mentioned in Appendix M (p. 87) as 'worst case assessments without mitigation would likely generate health impacts for some receivers during some works', though these are not elaborated on in Chapter 14, with mentions of 'health' limited to issues raised during community consultation (section 14.1.4), under construction impacts and operational impacts as 'Health of the community' (though no further information is given), and in broad terms (such as 'Relocation health risks' or 'important for community health'). Given community health concerns (and those raised during consultation with the public and councils) this issue must be more thoroughly addressed to ensure the appropriate 'mitigation' measures as mentioned are followed.
 - Considering the size of the document, relegating important information to Appendices significantly reduces the ability for relevant stakeholders to identify and assess this information.
- The inconsistency of the assessment methodology is noted:
 - Impacts are evaluated in consideration of their duration and spatial scope, and the combination of these two is given as the level of impact. It is difficult from this point on (and including in the SIA and EIA) to see this methodology utilised in any great detail, and especially not with any consistency.
 - For instance, how does the EIA come to the finding that 'Overall, the assessment has concluded that the positive impacts on businesses and the economic benefits of the project are expected to outweigh any negative impacts that cannot be satisfactorily mitigated' (Appendix N, p. 9-1)? Insufficient assessment and evidence is provided within the EIS main document or indeed the Appendices to support such a conclusion.
- The 'social impacts' of transport infrastructure are considered to be 'property acquisition, community networks and amenity' (Chapter 14, p. 2), an insufficient, incomplete and assumptive starting point for a project of this scope and impact.
- The maximum spatial scope of the Impact assessment rating criteria is 'Inner western region of Sydney'—though with this project touted to be the 'biggest transport project in Australia' (http://www.westconnex.com.au/news/media_releases/media_releases_2013/20130919_biggest_transport_project_begins.html) the economic and social ramifications of it will be far broader than this. The scope of this section is too narrow. For instance:
 - 'Significant subsurface works associated with the project, such as tunnelling, would occur outside these precincts; however, these are not expected to impact at the surface'—no objective analysis or findings from other sections given, assumed from the start of this section.

- ‘City of Sydney Council LGA is outside the project footprint and would be indirectly affected’—at this scale transport infrastructure, especially of a radial nature funnelling traffic directly into the city centre, would be expected to affect traffic flows and the central city of the region in which it is implemented. Also, ‘indirect effects’ that positively boost the state’s economy are examined in a subsequent section.
- Community consultation is not distinguished between its different elements or functions (Chapter 14, p. 6), for example consultation ‘undertaken...during land acquisition and community engagement activities’ is unlikely to allow for any collaboration or empowerment of the community. ‘Consultation’ will continue through to operation of the M4 – East project, but the lack of clarification between types of consultation on the IAP2 spectrum (<https://www.iap2.org.au/resources/iap2s-public-participation-spectrum>) in this section indicates insufficient consultation.
 - Particularly for the EIA, which was not based on direct consultation (see Appendix N, p. 3-2)—instead using data from other sections of the EIS, stating that consultation with businesses and business groups will continue. Given the significant social and economic ramifications of this project, it would be assumed consultation with homeowners (homes being acquired and affected) and business owners (businesses to acquired and affected) would be warranted as a minimum action (the ‘precautionary principal’ is noted elsewhere in the document) to assess potential social and economic impacts.
- The SIA (Appendix M) is not definitive, and would have hopefully been able to collect more reliable data so that the effects and its findings could be validated:
 - ‘It is important to note, that not all social infrastructure may be captured in this report. Information has been gathered through desktop research, site visits, information from Councils and information provided as part of community consultation. There may be some social infrastructure which is not identified at this stage but it is anticipated that Appendix C will be continually updated as part of the ongoing environmental planning and assessment process’ (Appendix M, p. 49).
- The EIA (Appendix N) is not based on a sound business case or cost-benefit analysis, thus limiting detail and the accuracy of any findings made:
 - For instance there is no consideration of negative, direct or indirect effects to the ‘wider state economy’ (Appendix N, p. 6-1), despite consideration of several positive indirect or accumulative effects.
 - ‘For the purpose of the EIA, an affected business has been defined as a business that would be impacted by property acquisition, changes in amenity, changes to accessibility or changes in the volume of passing trade due to the construction and operation of the project’—though a figure for the actual total number of businesses these changes affect is not provided in the EIS.
- In ‘Chapter 14 Social and economic’, as well as Appendix M and Appendix N, cumulative *benefits* are given preference (such as overall travel time improvements to 2031 once all project sections are complete) while cumulative *negative impacts* of the overall project are largely overlooked
- The EIA is by its own admission is predominantly ‘a qualitative assessment of the impacts’ (Appendix N, p. 3-4), despite its use of economic multipliers as a quantitative measure and the opportunity/need here to provide an economic business case outlining where the benefits of the M4 East project would be achieved.

- A 52% rise in urban population to 2031 as will be experienced in the study area alone suggests that alternatives other than road expansion are necessary to deal with such rapid growth while maintaining transport efficiency and urban liveability levels.
- Given the types of businesses in the area (the major three being real estate, professional and technical), and the focus in the preceding 'benefits' of the project on freight, it is clear that the project will be of minimal economic benefit to those businesses within the study area.
- 2% of trips made are by bus in the area—yet one of the big 'benefits' of this project is touted as improved bus service—not necessarily needed in the area with such low patronage and given the high number of train connections within the local study area (seven).
- Simply listing social infrastructure within the study region cannot be defined as social impact assessment—nowhere (either in Chapter 14 or in the Social Impact Assessment) is there a systematic review of each piece of (social) infrastructure against a best-practice framework to determine whether it will be affected and, if so, the extent to which it will be and appropriate action to be taken.
- Under 'Existing environment of social infrastructure', little is made of the sense of community or the impact the project might have. Social infrastructure can be defined as the 'hard' infrastructure (Hancock, 1993) (such as halls, schools, churches etc. and is rudimentarily addressed in this SIA and EIS) and the 'soft' infrastructure (such as the relationships that form between people and groups in the community and is largely overlooked in this report). This report does not address these forms of social capital (a relevant example of 'soft' social infrastructure might be the fact that in many suburbs groups have mobilised against the project in WestConnex Action Groups—simultaneously giving an idea of community sentiment regarding the project, community spirit and the types of social aspects that the report fails to even approach).
 - The social effects of such large scale road projects are evident in works such as Jacobs (1961) from the 1960s, and are hinted at by the local government submissions in this report (such as concern by Ashfield Council regarding the mobility, safety, connectivity and isolation of its older residents) (see Appendix M, p. 61), though are not dealt with as part of the EIS. Many cities globally have realised the social cost of road-building at the expense of communities and have either stopped building large road projects, or are ripping existing ones down.
- The fact that the first construction impact listed is economic stimulus and a boost in the economy and no evaluation of its effects (such as even being 'minor') shows that the framework of evaluating impacts outlined in the methodology section has not been followed, especially considering the far greater negative impacts that will occur.
 - Also, in talking about an 'increase in demand for labour may increase wages in the region, particularly for construction workers' there is no reference or mention of where else has happened in either the main document or the EIA. Would such localised wage increases be plausible?
- Visual environment only considers residents and workers—disregards context given in the introduction of the social and economic section (that the area also includes businesses and important social infrastructure such as schools, churches etc) which would require shoppers, students, etc. to be included—otherwise why was the 'Existing environment' context given in such detail?
- While changes to accessibility appear to have been evaluated against the framework listed in the methodology, it is not clear how they are rated (eg are they evaluated as 'minor')

impacts due to them being considered ‘short-term’ but with considerable effects, or some other combination?).

- Given the impact assessment rating criteria (Table 14.2), the medium-term timeframe and the municipality (and in some cases regional) effects of these considerations, can it be assumed that each of the impacts concerning traffic delays would be at least moderate? No definite result of this analysis is given in the report.
 - Regarding property acquisition, simply stating that dwellings on partially acquired properties will not be affected is insufficient—what measures are to be taken to ensure this from a social/economic perspective, or what reason is there to assume that they will not be affected?
 - ‘14.3 Assessment of construction impacts’ lists ‘Health of the community’ as one of six considerations that will be discussed in the following section, however there is no such section. This is a concern given the far-reaching social impacts relating to health that this project will have.
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- To list the negative aspects of surface works in dot point form in Chapter 14 given the extent of the impact they will have socially *and* economically on the region (consider: loss of vegetation screening, new road infrastructure – interchanges, tunnel ramps, bridges/flyovers and new noise walls, closer proximity to new road infrastructure for some properties, ancillary operation facilities such as ventilation facilities, the motorway control centre, electricity sub-stations and the water treatment facility, loss of heritage items and changes to streetscapes) is insufficient, with minimal additional detail given in Appendices M and N (for instance regarding the new road infrastructure and the ventilation stacks, electricity sub-stations and the loss of heritage items). The high-impact nature of road surface-works warrant a more thorough investigation regarding social impacts, particularly.
 - In Appendix M health is listed (p. 93), and this section talks about vehicle emission rates, however not at the emission stacks. This issue should be addressed (whether positive or negative) considering widespread community and council concern at the social (health) impacts and economic (health) costs of these ventilation facilities.
 - For those properties affected by the noise of the project it is assumed that they will ‘keep external windows and doors shut and have minimal use of outdoor areas’ and that ‘Impacts on the use and enjoyment of outdoor areas due to increased noise may result in increased levels of stress at individual properties’. This is a significant social impact and warrants more mitigation and analysis than is given in this report. No consultation was undertaken to determine the feasibility of such measures.
 - Minimal consideration is given to existing businesses along Parramatta Road, especially in the EIA document itself, despite the prediction of a ‘19% loss of output and full time employment for businesses along Parramatta Road due to reduced passing trade, equivalent to \$7.3 million output’.
 - Although it is noted that ‘This assessment does not take into account the **potential increase in passing trade for businesses along Parramatta Road, west of Concord Road, from an increase in traffic volumes associated with drivers choosing to avoid the motorway tolls**. Five businesses were identified as potentially benefitting from an increase in passing trade, comprising service stations, a car wash and cafes/restaurants.’—making the possibility of ‘rat-running’ clear, and indicating a willingness to include data in the report when it benefits the issue in question.

- Broad and abstract terms are included in the social and economic assessment such as claims that ‘Travel time savings (or transport efficiency) provide significant social benefits, freeing more time for recreation, social interaction and economic activities, all of which contribute to physical and mental health. With reduced congestion on major roads in the long term, local mobility would also likely be enhanced. Parramatta Road is currently a barrier to many local and regional social networks. Reduced congestion at intersections to cross the corridor and on the road itself would be an incentive for increased expansion across the corridor for community interaction, enhancing access to regional social infrastructure such as Sydney Olympic Park and Flemington Markets.’ These claims open the door to analysis through similar broader lenses including car dependence (and its effects on population health, the economy and societal connections), societal impacts of induced traffic demand and impacts on social infrastructure/community connectedness, all of which (and more) are missing from the report.
- **The WestConnex M4 – East EIS document itself states that: ‘Improvements in public transport availability and efficiency would have broad social benefits. The use of public transport includes incidental exercise (eg walking to and from bus or train stops), increasing the chance of travellers meeting recommended daily physical activity targets. A more active lifestyle can help reduce the risk of preventable diseases, including coronary heart disease, stroke, type 2 diabetes, obesity and some cancers. It can also help improve mental health, community life, social wellbeing and community safety.’** The benefits of public and active transport are self-evident.
- ‘14.4 Assessment of operational impacts’ lists ‘Health of the community’ as one of six considerations, however the subsequent section is missing.
- Cumulative construction impacts given as most likely to occur because of concurrent construction activity (such as new M5 and M4 widening) are employment and economic stimulus opportunities, increased local employment opportunities, potential higher wages for construction workers, opportunity for local businesses to supply the goods and services. To consider these positive aspects as the first and most relevant ‘cumulative impacts’ of construction of such a large-scale road project is difficult to comprehend, as is the exclusion of any potential negative cumulative impacts of multiple construction works from Chapter 14.
- No further mention in Chapter 14 of how any other negative impacts during construction would interact with each other or on other users of the area (residents, business owners etc.), which would be beneficially addressed here to assess the overall impact of the project (eg loss of local amenity AND loss of local service AND loss of accessibility AND impacting on more vulnerable groups such as elderly populations...).
- No negative cumulative social and/or economic impacts of the operation of this project are outlined—not even negative operation impacts are given in Appendix M.
- Management of changes to amenity, traffic and access refers readers to other chapters, but this is the section in which the *social* and *economic* impacts of these should be addressed in detail; they are not.

- Bill Boyce and Reg Coady reserves are listed as being restored to their 'pre-construction condition' with the timing given as 'pre-construction'—the logistical aspect of this part of the project plan is difficult to comprehend.
- Mitigation works, such as those to reduce impacts on social infrastructure (Appendix M, p. ii), centre predominantly around consultation and lack clear and decisive measures by which tangible effects of the M4 East project (such as noise, vibration and visual amenity) will be addressed.
- Given the extent of the social and economic impacts that *will* occur as a result of the project, the list of proposed actions is insufficient in both impacts that it addresses and the detail of responses given for the matters that are addressed. It is difficult to effectively and confidently evaluate the scope and extent of the social *or* economic effects of the M4 East project from this chapter and associated appendices, let alone the combined effects. This is made especially difficult given the lack of a business case for the WestConnex project, which must surely form a central part of any economic evaluation of such a costly (in many ways) proposal.

In summary:

- I object to the insufficient scale and scope used in this analysis to identify economic and social impacts.
- I object to the fact that an Economic Impact Assessment has been conducted without a business case made available to the public.
- I object to the lack of community/stakeholder consultation regarding the economic and social impacts to be imposed on businesses and residents, especially.
- I object to the lack of detail regarding the social implications for acquisitions and relocation of businesses and particularly households, and to the process that is allowing this to proceed.
- I object to the incomplete range of economic and social impacts identified as resulting from this project.
- I object to the incomplete and insufficient economic and social 'mitigation works' identified, especially to the lack of detail surrounding these actions.
- I object to the notion that 'Overall, the assessment has concluded that the positive impacts on businesses and the economic benefits of the project are expected to outweigh any negative impacts that cannot be satisfactorily mitigated' (Appendix N, p. 9-1); insufficient assessment and evidence (including any form of consultation) is provided to support such a conclusion.

I request a written response to all of the concerns outlined above.