

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

To the Director, Major Project Assessments, Department of Planning

I write to express my strong objection to the WestConnex M4 East motorway proposal.

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

I strongly object to the lack of due process evidenced by the awarding of contracts for the process, the compulsory acquisition of family homes and the planned destruction of local communities and greenspace before the affected local community had even been advised of the full facts. The fact that the State Government has already signed multi-billion dollar contracts for WestConnex before this EIS was even placed on public exhibition undermines community confidence that this is a genuine consultation process.

This EIS considers benefits for all stages of the project but doesn't even begin to adequately address the negative impacts along the whole route or provide sufficient satisfactory mitigation measures to counter the unacceptable levels of disruption due to years of noise, heavy vehicle movements, tunnelling beneath homes and heritage buildings as well as the health risks due to exposure to increased levels of pollution. The EIS also fails to provide appropriate explanation around how the increased traffic at the end of Stage 1 (but prior to the completion of Stage 3 which will result in heavy congestion around Haberfield) will be addressed. It also fails to address the inevitable outcome of rat running through local inner suburbs to avoid this congestion and tolls.

My specific objectives to the project are outlined below:

1. Health Risks

There's strong evidence about the dangers to human health from a wide range of vehicle exhaust pollutants, especially tiny particulate matter. The health risks for this tiny particle matter are increased for the young and elderly. Despite this fact, due to the increased costs of fitting filtration systems to the smokestacks, unfiltered ventilation exhaust stacks will be located less than 500 metres from public schools, childcare centres and nursing homes in the west, south west and inner west suburbs on the WestConnex route. The proposal to locate an unfiltered smokestack on the corner of Wattle Street and Parramatta Road in Haberfield less than 500 metres from a public school and adjacent to an early childcare facility and within a 1.5 kilometre radius of multiple other schools, pre-schools and aged care facilities is completely unacceptable.

In the WestConnex air quality modelling for PM_{2.5}s (particulate matter that's less than 2.5 microns in diameter), the results show that the air quality at the 31 sites modelled across the M4 East area will greatly exceed the proposed national standard of 8 microns per cubic metre of air by 2021. The WestConnex modelling also shows the air quality for a large section of Sydney including Haberfield, Five Dock, Ashfield, Burwood, Strathfield, Concord, Canada Bay, Homebush and Flemington, which is home to tens of thousands of residents, will be about 25% worse in the next 6 years than the target air quality standard for these dangerous pollutants.

Modern diesel exhaust consists mostly of particles sized PM_{0.5} and smaller (i.e less than 0.5 micrometres and at least one fifth smaller than PM_{2.5}) however the EIS does not measure the quantity of these particles that drivers will be exposed to in tunnels. The EIS argues that the NSW approved methods has no requirement to measure PM_{2.5}. It is not acceptable to state that the technology to measure these PM emissions is difficult and not required by NSW approved methods (section 9.2.4) . The public needs to know what they would be exposed to in tunnel and via the tunnel exhaust stacks and portals. There are mitigating technologies that reduce in-tunnel emissions and emissions from tunnel exhaust stacks, by the use of electronic precipitators which if designed from the start can work satisfactorily as they do in tunnel systems in Europe and Hong Kong. Also carbon filtration can reduce nitrous oxide build-up both in tunnel and from the exhaust stacks. Why have these mitigation measures not been included in the report?

The claim that there will be less emissions and pollution with WestConnex due to free flowing traffic is not supported by the facts in the EIS. Total traffic east-west across this part of Sydney will jump 53% by 2031. Such an increase is hardly going to improve air quality.

The EIS states in Section 26.4.2 that there would be significant increases in concentrations of pollutants in a select number of sites, but does not specify where. Detailed information is required about where the pollution impacts are predicted to be worse as a consequence of this project and identification of what remedies or solutions are proposed. These matters must be satisfactorily addressed before the proposal proceeds any further.

On this basis I strongly object to the proposed location of the Haberfield smokestack due to the established health risks for the young and elderly.

Furthermore, there are a number of additional health impacts that are not adequately addressed in the EIS.

The EIS refers to heavy vehicle movements and subterranean boring being permitted on a 24 hour basis. This would disrupt sleep patterns for many residents over a period of years. Poor sleep is associated with a number of health impacts including increased blood pressure, increased cholesterol levels, impaired work performance, increased anxiety and depression. It is not acceptable to allow high levels of noise around the clock when local by-laws do not allow increased noise levels after 10pm and before 6am. The same curfew that is applied to aircraft should be applied to any heavy vehicle movements and drilling activity.

Furthermore, the redistribution of traffic and focussed portal entry and exits would cause concentrations of noise and pollution. In addition ventilation fans and exhaust stacks would create new noise sources that would require monitoring. The EIS fails to adequately address these issues or provide appropriate mitigation measures. This information should be clearly spelled out and readily identified and appropriate mitigation planned.

I strongly object to the increased health risks that the population of the Inner West including my young children will be exposed to. It is unreasonable to expect that the vulnerable including children, the elderly and those with compromised immune systems should be exposed to increased levels of cancer causing pollutants and round-the-clock noise from heavy vehicles and machinery when mitigation strategies exist but have been excluded due to cost concerns.

2. Irreversible Damage to Heritage Buildings and Sites

WestConnex will negatively impact on some of Sydney's most important heritage sites, which are zoned as Heritage Conservation Areas by the NSW Government and are significant not only to local communities but to all Australians. Many homes and heritage items are slated for demolition in Ashfield and Haberfield as part of WestConnex Stage 1 and the heritage suburbs of Newtown, St. Peters, and Enmore will all be significantly impacted by Stage 2 of the proposed project.

Haberfield was designated a State Conservation Area in 1985 and was added to the register of the National Estate in 1991. The M4 East EIS notes that 53 properties within the Haberfield Conservation Area will be demolished, "permanently (removing) a substantial portion of the built heritage items fronting Wattle Street." 29 of these are assessed as 'contributory to the values of the Conservation Area'. Haberfield properties in Ramsay, Martin, Walker, Northcote, Wollesley and Bland Streets are being acquired and two intact tree lined streets (Sydney and Edwards) in Concord, will be affected. The EIS states that this proposal would have a major adverse affect on Haberfield and the overall project would have a major cumulative impact on the Haberfield Conservation Area. It does not propose any mitigation or restitution for this loss (Definition of Major Adverse Impact p19-11, Table 19-4 EIS Section 1B: "Actions that would have a severe, long-term and possibly irreversible impact on a heritage item. Actions in this category would include partial or complete demolition of a heritage item or addition of new structures in its vicinity that destroy the visual setting of the item. These items cannot be fully mitigated.")

Furthermore, WestConnex Stage 1 will dump 3 lanes of traffic from the M4 onto Wattle Street Haberfield, to connect to the already inadequate 2-lane City West Link. Traffic changes include new right-hand-turn lanes off Wattle Street onto Ramsay and Waratah Streets, which will encourage drivers to 'rat-run' through Haberfield and Leichhardt on their way to the City down quiet suburban streets one of which has a public school situated on it.

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 opposes motorway proposals that promote increased large truck movements through urban precincts, particularly those with heritage significance.

I strongly object to the irreversible damage to significant heritage buildings and suburbs and to the increased traffic flows that will inevitably occur through currently quiet suburban streets.

3. Increased Traffic Flows

The EIS fails to adequately provide an alternative public transport solution using the estimated \$15.4 billion required to construct Westconnex. WestConnex's own modelling shows that by 2031 the M4 East will reach capacity. \$15.4 billion would more than pay for a fully integrated public transport system and leave funds for other vital infrastructure like schools and hospitals.

Predictions show that by 2031, traffic volumes will increase significantly on key roads in the target area and this means traffic congestion will just get worse. Traffic on Parramatta Rd at Homebush will increase by 46% with average weekday traffic climbing from 33,600 to 49,800 by the year 2031. East-west traffic along Lyons Rd, Dobroyd Parade, Parramatta Rd and New Canterbury Rd will jump by about 48% if WestConnex is built, averaging around 193 cars a minute, 24 hours a day. More than 31,000 extra cars will feed into the inner-west every day, onto small residential streets and into Newtown and Enmore, where increased clearways will be inevitable. The proposed tunnel linking the M4 and M5 in Stage 3 of the project will result in very high traffic densities.

Once the project is completed in 2019, contrary to claims by WDA spokespeople that traffic levels will be reduced, the EIS notes that Haberfield and Ashfield would remain significantly impacted. The increased induced traffic would tunnel into two already crowded corridors (Parramatta Road and Dobroyd Parade). Proposed new right hand turns at Ramsey Street and Waratah Street off Wattle Street would increase through traffic in a residential suburb. The EIS notes in its cumulative impact section (26), that there would be greater traffic densities along both the Eastern sector of Parramatta Road and Wattle Street when the whole project is complete. This appears to contradict other assertions about the localised benefits.

4. Construction Related Impacts

The size of the project is huge with a 65 hectare project footprint. This includes clearance of 13 hectares of vegetation and established tree cover in suburbs where green space is already limited and highly sought after for exercise and recreation. I particularly object to the proposed destruction of healthy iconic trees in the Reg Coady reserve.

The EIS discussed the extent of the construction period of around three years. This includes a plan for 24 hour operations of heavy truck removal with many places experiencing 20-40 heavy truck movements an hour 24 hours a day as over 16 million tonnes of spoil are removed. Part of this includes trucks running up and down Wattle Street adjacent to residential areas where traffic is usually light between 9pm and 6am.

I object to the proposed 24 hour spoil removal by truck.

5. Lack of Due Process in Development of the Project

There are serious concerns about the way the WestConnex project has been developed and progressed, with many questioning the lack of good governance, oversight and economic rationale for this major infrastructure project. The lack of transparency around the project, including state and federal governments' refusal to table documents detailing the cost-benefit analysis or business case for the project, is of great concern.

Specifically no business case has been revealed for WestConnex, the largest infrastructure project in Australia today at a projected \$15.4 billion dollars.

In Dec 2014 the NSW Auditor-General noted that there were 'shortcomings in the level of independent assurance provided to the Government'. According to the Government's framework, an additional 4 'Gateway' reviews should have been conducted. The NSW Auditor-General noted fundamental conflicts in the fact that WestConnex steering committees and boards also provided assurances to Government.

It is particularly concerning that approximately 400 homes and businesses are subject to compulsory acquisition by WestConnex for the M4 East and M5 even before the project has been approved and before a business case supporting the project has been released, including 41 properties in Brown Street, Campbell Street, Campbell Road, and Florence Street in St Peters. Many residents report that prices being offered by the government grossly undervalue their properties and they have been given a 90 day time frame for a negotiated settlement to be finalised before court proceedings will commence.

The choice of AECOM to produce the M4 East EIS documentation is also of concern. Given that AECOM has been involved in the WestConnex project from the outset and paid for a range of services including project concept development, tunnel design, and communication services and is also involved in Urban Growth NSW's proposal for high rise development along Parramatta Road, AECOM could be perceived to have a significant conflict of interest and a strong commercial interest in WestConnex going ahead. The EIS uses AECOM's traffic modelling predictions for traffic congestion forecasts and air quality predictions. Given that the company is currently under investigation for falsely inflating the traffic predictions for the failed Clem 7 RiverCity tunnel in Brisbane, this raises serious concerns around the company's independence and competence. When traffic modelling experts and academics such as Professor Peter Newman (who was on the board of infrastructure Australia for four years) have raised concerns around the proposed project and projected traffic forecast figures these have been ignored and an acceptable rebuttal has not been forthcoming. Independent studies commissioned by the City of Sydney that contradicted WDA's traffic modelling were similarly rejected without acceptable levels of consideration.

Equally concerning is the fact that consultations with Local Councils were only conducted on the concept plan regarding the M4East and were not repeated in 2015 after the final route was announced. Therefore councils were not given the opportunity to address the issues of loss of housing or concerns about loss of heritage on the final route. This again circumvents normal procedure and appears to be a way of pushing the project through without due process being observed.

I strongly object to a project of the size and scale of WestConnex being progressed without the release of the full business case. This should be released for consultation with local councils and other affected parties before this project proceeds further. Additional traffic modelling studies should also be undertaken by an independent third party with no financial or commercial interests in the WestConnex project proceeding.