

**Secretary**

**Date: 01/11/ 2015**

**DP&E**

**Project No. SSI 6307**

**NSW Dept. of Planning & Environment**

**GPO Box 39**

**SYDNEY NSW 2001**

**Re – WESTCONNEX PROJECT (the Project) WestConnex M4 East EIS (SSI 6307).**

I am writing this submission as comment on the above EIS and my consequent opposition to the Project. My comments revolve around 4 main areas: Process; Health; World Standing (impact on ours as residents of NSW and Australia) and; Waste (opportunity and money).

I oppose the Project.

**PROCESS.**

That contracts have been let, and construction activity commenced, prior to the release of the business case and EIS casts doubt on the proponents' commitment to due process. This chronology is all wrong.

There must be serious doubts about the credibility of a report prepared by an organisation that has recently been the subject of legal proceedings relating to the accuracy and reliability of their traffic studies.

The basis of much of the data is unstated. For example, do the traffic forecasts take into account the impact of the proposed re-development of the Parramatta Road corridor and the recently announced proposed sub-divisions on the outskirts of Sydney? If not, why not?

The EIS informs us that any traffic benefit will only flow from future, currently unfunded and unapproved, extensions to the motorway project of Westconnex. That extension is known as Stage 3 (a tunnel from Haberfield to St Peters to link the M4 with the M5).

The multiple changes in structure of the responsible body appear, at best to be a symptom of disorder, at worst an attempt to obfuscate and discourage real investigation and understanding.

The process undertaken in production of this EIS is flawed and opaque. It, therefore, lacks credibility.

This makes the release of the business case, if not cancellation of the entire project, an imperative.

## **HEALTH.**

The air quality in the immediate surrounds and within the tunnels will contain high levels of health impairing pollutants.

The EIS has used soon-to-be outdated standards for particulate matter (PM) levels as well as using unexplained methods for estimation of pollutant levels. There is growing knowledge and acceptance of the carcinogenic nature of diesel exhaust fumes. To spend over \$15 billion on a project and not attempt to mitigate the high level of destructive pollution is an obscenity. Filtration of motorway tunnels is World's best practice and should be incorporated in the design of any, and every, new proposal for Australia.

Not all air pollutants that are likely to be emitted from the Project have been considered. Only one "expected traffic scenario" has been considered for surface roads, this may not be representative of worst-case scenarios which may entail much greater traffic volumes on Parramatta Road and/or delays in the provision of the M4-M5 Link

No predictions have been made in regard to air quality due to the ventilation outlets in isolation – rather the model is predicated on averages across a much wider area. This is inadequate and unacceptable when we are considering adverse health outcomes.

During construction, it is proposed that there will be 24 hours a day, seven days a week tunnelling. This will cause considerable sleep disturbance and consequential adverse health outcomes. This should not be allowed.

Added to this is the above-ground construction's disruption to residents' daily lives. The noise, dust and stress this will cause are not adequately dealt with within the EIS. The EIS does not adequately consider alternatives, nor mitigation, for residents.

Construction emissions and impacts are dealt with generically with the underlying assumption that impacts are manageable such that the residual effect will be "not significant". No detailed information is provided regarding proposed mitigation measures to prevent the generation and emission of dust and air pollutants during construction – only generic information is provided with further detail deferred to "Dust Management Plans" that have not yet been prepared. A more specific assessment is required.

On this basis the Project should be cancelled. If it is not to be cancelled, it should be re-considered and a new EIS commissioned with an emphasis on mitigation of adverse health outcomes. It should consider alternative tunnel lengths and location and, most importantly, the filtration of portals and exhaust stacks.

**WORLD STANDING (of NSW and Australia).**

If we are to spend over \$15 billion on a project, surely we should be designing it to incorporate the very latest technology and design to maximise its social, health and economic outcomes?

The proposal entails partial destruction of a heritage area with world significance. Haberfield Heritage Conservation Area is one of the first planned garden suburbs in the world and is substantially still intact.

The Project, by admission in the EIS, will have a significant adverse impact on the heritage values of the Haberfield Heritage Conservation Area. In addition, there will be a broader social impact on the local community whose sense of place and community is importantly founded on the existence of such important heritage values of the local environment.

By concentrating on the outmoded car-based transport system (ignoring the need for simultaneous development of mass transport options) and the out-of-hand dismissal of filtration of the proposed tunnels, the EIS shows that NSW, and Australia, is not interested in design that aligns us with World's best practice.

This shows NSW, and Australia, in an extremely poor light on the world stage.

On this basis the Project should be cancelled. If not cancelled, then there should be consideration of alternatives that take account of the latest technology on the one hand and the preservation of our important and very valuable Haberfield Heritage Conservation Area on the other.

**WASTE.**

The expenditure of over \$15 billion to gain no real improvement in traffic flow but, instead, the loss of a valuable part of our heritage and the deterioration in the health and social well-being of a significant number of Sydney residents is incomprehensible.

Consideration should be given to alternative uses of this money: alternatives that provide immediate, lasting, improvements in the social, health and economic well-being of residents of Sydney and NSW.

The Project as proposed wastes a valuable opportunity: an opportunity to move Sydney into the 21<sup>st</sup> Century; an opportunity to incorporate World's best practice in the design and construction of amenities to serve the modern metropolis. Using road-based strategies for urban renewal and transport solutions is so mid-20<sup>th</sup> Century.

That it is proposed to spend over \$15 billion on this wasted opportunity is a heinous waste of Australia's, and NSW's, ever diminishing (in real terms) tax take. We can do so much better. We must do so much better!

On that basis, the Project should be cancelled. If it is not to be cancelled, new considerations should be given to new, better, ways to take Sydney in to the future.

**Summary.**

In conclusion, I would like to re-iterate that I believe the EIS lacks adequate consideration of alternatives, mitigations and possible outcomes. It lacks credibility. Consequently, the Project lacks credibility.

I oppose the Project and reject the EIS' findings.

The Project should be cancelled.

Failing cancellation of the project, an alternate EIS should be commissioned from a credible organisation with a brief to consider all important alternatives and mitigation.

There should be detailed proposals for public transport, pedestrian and cycling initiatives to encourage modal shift to more sustainable travel.

There should be better siting so as to preserve the Haberfield Heritage Conservation Area.

There should be the incorporation of World's best practice in technology for improvements in health outcomes (for example filtration of tunnel portals and exhaust stacks).

Please respond to this submission?

Yours sincerely,

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