

SSI 6307
NSW Department of Planning and Environment
GPO Box 39
Sydney NSW 2001)

1 November 2015

Submission to Application Number SSI 6307 – Westconnex M4 East

Dear Department of Planning and Environment,

I object to and do not support the Application Number SSI 6307 – Westconnex M4 East. I request the NSW Department of Planning and Environment reject and not approve this proposal.

In this submission I focus on the following key objections.

Objections

Objection: Failure to assess, address and mitigate impacts from the proposal on local roads and traffic conditions. The proposal will significant impact local roads from increased traffic, congestion and loss of parking. This will cause subsequent impacts including noise, air quality, community, visual and amenity impacts.

In particular, I object to the St Peter's Interchange planning and proposal. The Proposals' planning and assessment for the St Peter's Interchange finishes at Campbell Street, St Peters and fails to address traffic impacts along Euston Road and McEvoy Street Alexandria as well as all connected local roads in the Alexandria, St Peters and Erskineville area. The WestConnex Delivery Authority has not conducted any traffic modelling beyond this Campbell Road point.

The proposal will increased traffic volumes, congestion and cause loss of parking along Euston Road and McEvoy Street Alexandria. It will have significant subsequent and flow on impacts to connected local roads in Alexandria, for example, Fountain Street, Maddox Road and Mitchell Road.. The proposal relies on traffic simply dispersing St Peters Interchange via local roads and does not assess, address and mitigate impacts on local roads from this traffic.

The proposal fails to adequately plan for traffic travelling to and from the St Peter's Interchange along local roads in Alexandria. This area is a highly residential community and the above impacts will cause subsequent impacts including noise, air quality, community, visual and amenity impacts. I draw your attention to significant development areas of Ashmore Precinct and Green Square (refer to City of Sydney Council) that will increase the population of this locality by well over 10,000 people. The failure to **assess, address and mitigate impacts incurred under the proposal from** induced traffic on local roads will lead to long term significant impacts at this location. The cumulative impact of the proposal combined with Ashmore Precinct and Green Square development has not been considered and will lead significant and unacceptable community impacts at this locality.

Objection: Significant impact from Air Pollution Health Risks as a result of the proposal

- 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 shows that 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 EIS also shows the air quality for a large section of Sydney, including Haberfield, Five Dock, Ashfield, Burwood, Strathfield, Concord, Canada Bay, Homebush and

Flemington, will be about 25% worse in the next 6 years than the target air quality standard.

- Unfiltered pollution exhaust stacks will be located less than 500m from public schools, childcare centres and nursing homes.
- Modern diesel exhaust consists mostly of particles sized PM0.5 and smaller. There is no measurement in the M4 EIS of the quantity of these particles that drivers will be exposed to in WestConnex's tunnels.
- Fine particle matter has been placed by the World Health Organisation (WHO) in the same class of carcinogens as asbestos. They can penetrate deep into the throat and lungs, and are known to cause premature mortality, respiratory and heart diseases, cancers, impaired lung development in children, and more.

Objection: Significant impacts to Community

- 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.
- Haberfield will lose over 50% of its apartment dwellings, home to mostly single and elderly long term residents, who will find it impossible to find similar accommodation nearby. Many will have to move away from their established communities that have been home for years.
- Many residents report that prices being offered by the government grossly undervalue their properties and they have been given 90 day time frame for a negotiated settlement to be finalised before court proceedings will commence.
- Many thousands of residents will be impacted by increased noise and pollution, which will have significant negative health impacts. This is also likely to devalue many homes near the WestConnex tollway and tunnels.
- Consultations with Local Councils were only done 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.
- Families, friends and neighbours are being separated and while the impact is most significant for those forced to move, it also affects the hundreds who remain. Local communities will be carved up by multi-lane roads separating one side of suburbs from another making it difficult for residents to access to social infrastructure.
- Communities will be subjected to years of disruption and traffic chaos during the construction phase of the tollway creating stress and loss of amenity
- Pedestrians and cyclists will be impacted as they face increased traffic density on key roads and increased travel times, affecting their health, safety and wellbeing.
- The Proposal will produce an outcome that will mean suburbs all along the 33 km route will be carved up by huge multi-lane roads, destroying community cohesion and access to amenities.

Objection: Impacts to Green Space and Biodiversity

- The M4 East EIS field surveys are very limited in duration and season. The EIS acknowledges this, stating "it is possible that seasonal species were not identified".
- Many homes targeted for acquisition and destruction for the M4 East have substantial yards with mature trees and green areas. Streetside green spaces will also disappear, along streets lined with established trees.
- Parks and open space provision under the proposal is inadequately compared to the footprint and scale of the proposal. More parkland, open space and designated environmental areas should be included to offset the impact incurred by the project. parkland, open space and designated environmental areas need to be planned for in close proximity to where loss under occurs the proposal.

Objection: Significant impact to HERITAGE items and heritage values

- 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’.
- The constant daily movement of large transport trucks severely degrades the urban environment, including those with heritage significance
- The Proposal’s EIS fails to adequately assess the cumulative impact of the proposal on heritage. The accumulated impact and destruction of numerous heritage items will be a highly significant impact and loss to the NSW Heritage inventory and, specifically the NSW State Heritage Register. I draw your attention to the *Heritage Act 1977* and obligations to ensure significant impact to heritage values are not incurred.

Objection: Lack of transparency around Westconnex

- No business case has been revealed for the \$15.4 billion WestConnex. The short ‘summary’ released by WestConnex to date is no substitute for a full and proper business case with detailed cost/benefit analyses, traffic modelling, and other data that can be independently scrutinised.
- 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 that WestConnex steering committees and boards also provided assurances to Government.
- The Sydney Motorway Corporation (SMC) is the public/private company charged with delivering WestConnex. Information about SMC cannot be captured through Freedom of Information requests, shielding it from scrutiny.

Objection: The proposal will encourage private vehicle transportation and discourage public transport.

- More tollways and roads encourage more people to drive - it’s called the ‘induced demand effect’.
- Westconnex 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. 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.

Cumulative financial impacts on the Public and community.

The creation of toll roads forces the public to pay to use the roads. This imposes a crippling, financial burden on the public. The proposal will have a long-term, cumulative impact on the public to fund the proposal through a user-pays approach. This is not in the public or community interest.

Conclusion

The proposal will cause numerous significant impacts. The cumulative impact of the above issues on the environment and community will be enormous. I therefore call on the NSW Department of Planning and Environmental as well as the NSW Minister for Planning to reject this proposal and I request a formal response to the concerns I have raised.

I do not consent to my name and contact details being made available to the publicly available.