

Director, Major Project Assessments

Department of Planning

GPO Box 39

Sydney NSW 2001

SUBMISSION: WESTCONNEX M4 EAST EIS (SSI 6307)

From: Councillor Rochelle Porteous (Leichhardt Council)

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

I also want to express my strong objection to the short amount of time provided to make a submission. 90 days was the time requested by many people including myself and it was the minimum time required, the 45 then extended to 55 days has been way too short and inherently biases the EIS process in favour of the proponent and against objectors.

I also object to this proposal because the stated objectives for the project were contrived to fit the project after it had already been announced. There has been no assessment and no consultation with the community on the WestConnex project before it was announced. In a democratic strategic planning process, objectives are set first based on the identified needs of the community, and then alternative projects/policies are appraised against their ability to meet those objectives. This has not happened with the WestConnex project.

In fact this EIS has not modelled alternative policy scenarios that could meet the transport/accessibility needs of NSW's growing population such as greater investment in public transport.

I object that EIS does not recommend referral of the M4East project to the Australian Government Department of the Environment for further assessment or approval under the EPBC Act. I believe that the M4 East project, in all proposed stages, and because of its cumulative impact should be referred to the Australian Government under the EPBC Act.

I also strongly object to the building of the WestConnex M4 East on the following grounds:

- The EIS does not contain the evidence to substantiate the claims made in it.
- On the evidence provided in the EIS, the WestConnex M4 East will not meet its objectives
- The EIS does not include a wide range of salient evidence.
- The EIS does not properly reflect the costs or benefits of the WestConnex M4 East
- The EIS does not properly consider the alternatives to the WestConnex M4 East
- The EIS does not properly fulfil the obligations in the Secretary's Environmental Assessment Requirements

The EIS has failed to model the impacts of implementing the proposed project (M4 East) relative to not implementing the proposed project (the 'future do minimum' scenario). The 'future do something' scenarios, on which the traffic, air quality, health and greenhouse modelling is based, include the M4 East project plus another uncommitted project to convert kerbside general traffic lanes on Parramatta Road to bus priority. With these additional bus lanes, the capacity of Parramatta Road would be significantly reduced and traffic volumes would fall accordingly, with drivers opting to use the M4 East tunnel instead. As such, the traffic volumes for the M4 East tunnel

have been dramatically overestimated, and the traffic volumes for Parramatta Road have been dramatically underestimated in the 'future do something' scenarios.

Traffic Modelling and Traffic and Transport Assessment is not acceptable and I note the following;

- 1) 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 appears not to have allowed 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.
- 2) The impacts of the project as proposed by the proponent (and as defined in Section 5 of the EIS), that is, the M4 East Tunnel with no new priority bus lanes on Parramatta Road, has not been presented in the EIS, as required by the SEARs.
- 3) There is no sensitivity analysis in the Traffic and Transport Assessment. The effects of varying key assumptions (e.g., willingness to pay the M4 East toll) have not been disclosed.
- 4) The Traffic and Transport Assessment has not modelled the travel time and accessibility impacts for non-motorised modes (walk and bicycle).
- 5) The issue of induced demand has not been adequately addressed in the Traffic and Transport Assessment.
- 6) The Traffic and Transport Assessment does not stand up to scrutiny. There is not enough information about the methodology, input data or assumptions for the forecasts to be independently verified
- 7) Given the seriously flawed Traffic and Transport Assessment, there can be no confidence in the accuracy of the other impact analyses in the EIS that are dependent on the traffic forecasts, in particular:
 - a) Air quality,
 - b) Noise and vibration,
 - c) Human health,
 - d) Greenhouse gas emissions.
- 8) There is not enough information about the modelling methodology for it to be replicated and the outputs independently verified.
- 9) The transport model (WRTM) has not been made available for independent verification.
- 10) The model input data and assumptions have not been made available for independent verification. What toll prices have been assumed?
- 11) The model coverage area is too small to capture all the transport impacts of the project. The project will affect transport demand and behaviour across the whole metropolitan area.
- 12) More detail on the Value of Travel Time Saving (VTTS)/Willingness to Pay (WTP) model is needed.
 - (a) The form and parameters of the model have not been given.
 - (b) If it was based on stated preference surveys, then how has the issue of hypothetical bias been addressed?

(c) Has the model been validated? Previous toll choice models in Australia have overestimated WTP for toll roads.

(d) Does it include the negative utility of the tunnel environment (monotony, no natural light, poor air quality)?

13) The weekend period has not been modelled, despite current weekend traffic volumes being higher than weekday traffic volumes on many corridors.

14) Insufficient information about the travel zone structure in the WRTM:

(a) What are the travel zones based on? How big are they?

(b) How are intra-zonal trips modelled?

(c) How are trips to/from external zones modelled?

I object to the impact on the natural and built environment.

In particular, I object 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 I object to the loss of trees from the Reg Coady reserve. Some of which are magnificent specimens and provide important habitat for native birds and canopy for the park.

I object to public land being seized to build a road that will force Sydneysiders into greater car dependency, induce more traffic into our city, and inevitably increase road congestion throughout all of Sydney.

I object to the loss and threat to the Grey-headed Flying-fox, a vulnerable fauna species listed under the TSC Act and the EPBBC Act. The Grey-headed Flying Fox has been recorded with the project footprint.

I also object to the threat caused by the M4 East project to the threatened microbat species, such as the Eastern Bentwing Bat and the Large-footed Myots. These are species that roost under bridges and culverts. Roosting bats, if present would be disrupted by construction activities. There is no suitable breeding habitat for these species within the construction footprint or adjoining areas. The project would also remove areas of foraging habitat (planted trees along roads and in parks) for the Eastern Bentwing Bat.

I object that the EIS recommends that a 'formal biodiversity offset is not considered necessary to compensate' for 'minor and localised residual impacts' of the M4East project. I believe that a formal biodiversity offset would be required.

I believe the Social Impact Statement is not adequate and needs to be redone.

I object to the validity of the Social Impacts Assessment (SIA) because baseline information and much of the research material used has inherent bias as it was not collected independently. I object that much of the material and information used as a basis for the GHD SIA had been collected and

supplied to the SIA team by WestConnex Delivery Authority. I object to this lack of independence of the SIA from the proponent of the project.

I object to the project because of poor and limited methodology used in the compilation of the SIA. How meaningful is the identification of the true and complete social impacts of the M4 East project on the Haberfield and Ashfield communities, – and what chance of redress and mitigation given such bias and limitation in the development of the SIA? I believe that the SIA must be redone, in order for the full social impacts of the project to be identified and addressed.

I object that much of the SIA work was done in preparation for the concept plan when the ‘baseline’ work was completed and before the preferred route was announced.

I object that there was no SIA consultation with Ashfield Council after initial discussions around the concept plan phase, and not in direct relation to the preferred and indicative route released in 2015. I strongly object to this serious omission, as the route and the impacts of the M4East project changed significantly from those associated with the concept phase announced in 2013.

I object that after the community ‘consultation’ re the 2013 concept plan there was no direct engagement with residents in the development of the SIA for the EIS of the preferred route released in 2015.

I object that only residents whose homes were notified of acquisition in 2013 and 2015 were considered ‘consulted’ in relation to the SIA for the EIS.

I object to how little knowledge or information about Haberfield and Ashfield Social Infrastructure Providers (SIPs) is revealed or referred to in the SIA of the EIS.

I object that Dobroyd Public School, St Joan of Arc Primary School, Ella Community centre and outreach programs, the Ella residential care facility, Ella childcare, and another child care centre in Ramsay St, Haberfield were omitted from direct consultation in the development the SIA.

I object that these important local services were not consulted in relation to the SIA, because they were considered outside the area affected by the route and project area.

I object that only SIPs located directly along the route and very close to it were regarded as within the project area to be considered for the SIA. I object that many other social infrastructure providers from Homebush to Haberfield must also have been excluded for consideration and consultation in preparation of the M4East EIS. I object because it is most likely that there will be many other aged, child and community centres and services that will have been overlooked in the EIS.

I object to important social impacts being neglected because they were considered outside the project – it is not.

I object to the lack of consideration of by the SIA of the considerable impact on residents, schools and community caused by local street changes required due to a new right hand turn into Waratah St, Haberfield. I understand that these impacts were omitted from the SIA, because they were seen as being outside the project area required to be considered by the SIA.

I object to the complete omission within the SIA and consideration of resulting social impacts from proposed traffic changes and restrictions at the intersection of City West Link with Timbrell Avenue

and Mortley Avenue, Haberfield. I understand that these impacts were omitted from the SIA, because they were seen as being outside the project area required to be considered by the SIA.

I object to the lack of attention by the SIA of the impacts on residents in Ashfield & Haberfield cause by trucks exiting into Bland St, Ashfield, from a construction site in the middle of a densely populated area.

I object to the SIA of the EIS because it is a poor and inadequate report.

I object to the terrible impact the WestConnex project will have on one of the most important heritage suburbs we have in Australia and perhaps what is the most intact

I object to the listed Heritage Items below being demolished in order to build WestConnex.

- 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

I object to the fact these heritage and contributing heritage buildings will be destroyed and I note that the National Trust's view on the heritage impacts of the WestConnex Motorway is that the impacts are severe.

I also object to the building of the WestConnex M4East because it will bring significant traffic congestion into Leichhardt, Rozelle, Lilyfield and Annandale. It is opposed by Leichhardt, Marrickville, Ashfield and City of Sydney Councils. The traffic modelling simply does not stack up and it is clear that WestConnex will clog up local roads with traffic even more so than is currently the case.

The WestConnex project should be assessed as a complete project not in this piecemeal way which does not allow any real scrutiny of the impacts.

I object to the fact that there is no public benefit for the community of the Inner West with the WestConnex project. The only real beneficiaries will be the private companies building the tollway and the private corporations buying the toll concession later at a bargain price.