

A response to WestConnex M4 East EIS proposal

I write this from several perspectives. I am a resident of Haberfield and work locally. I am a registered medical practitioner with specialist qualifications in both child & adolescent and general psychiatry (FRANZCP) and public health medicine (FAFPHM). Additionally I am a graduate of Harvard University in public administration (MPA) and of the Australian Institute of Company Directors (GAICD).

This document summarises my objections to the recently published EIS for the M4East proposal. My objections concentrate on aspects of the health and social impact, including social & emotional wellbeing of residents as a consequence of the M4 East proposal. This along with linked projects, the M5 East duplication & the M4-5 link projects are the bulk of the 33 km long road & tunnel project, collectively known as WestConnex.

My submission addresses concerns in several areas:

- General concerns about the flawed consultation and governance
- Initial impacts of the project to date
- Construction related impacts
- Post construction impacts
- Multiple unanswered questions or deficits in the current EIS

1. General concerns about the flawed consultation and governance

Individually and collectively these projects have already impacted on the social and economic life of residents and workers in the inner west, since the current proposal was first mooted in late 2013. In particular, the M4 East project impacts heavily on residents and businesses around Homebush/North Strathfield & Concord and its Western end, and on residents and businesses around Haberfield/Ashfield & Croydon at its eastern end.

In addition the M4East project is proposed at the same time as other significant proposals likely to affect residents in the inner west.

- The first are the NSW Urban growth proposals for the Parramatta Road Corridor, with five of the eight proposed growth precincts within the inner west, coupled with the Bays precinct and the Central to Eveleigh project. Together these projects will have substantial influences on the character, built environment and population make-up of the inner west.
- The second are proposals for forced amalgamations of local councils. Many residents are concerned that this will mean local affairs will be managed by large distant bureaucracies. There is a real sense that local decision-making and democracy is being removed from residents by this enforced process. There is also great frustration that decisions affecting the lives of people are being made by a government that seems to show no interest in the impacts these decisions have on the lives of local people. There has been no attempt by the Premier nor relevant Government ministers to actually visit the sites of where residents are being forced from their homes. They have not justified why it is necessary to destroy vibrant communities. Nor have they proposed adequate mitigation of these impacts on the lives of individuals, families, friends and community.

I object to the proposal because it has not been presented in a way that enables the public to determine if the proposal is an appropriate and effective solution for Sydney's significant transport problems.

These combined sets of factors have left local residents feeling sad and angry about the process to date, and many feel sceptical about there being any real concern for their rights and welfare by the NSW and Federal Governments or their agencies.

In addition no comprehensive business case has been presented and the arguments in the 5000 pages of the EIS are simplistic and lack depth. Critics such as the NSW Auditor-General and MLC Ms Mehreen Faruqi have seen the WestConnex business case and have made strong arguments against why they consider it to be a flawed process and proposal. There has been no serious rebuttal from the proponents, which suggests that the critiques are accurate and that the whole process is flawed. If this was private company seeking to use shareholder funds, the lack of a publically available business case would be disturbing for shareholders. With the M4 East project it is public money that is being proposed for investment. The scheme proponents are keeping the public in the dark about their financing methods and the economic rationale for using public funds in the manner proposed.

I object to the fact that public money has been used to establish a private company, with 2 ministerial shareholders, so that the corporation does not have to be publically accountable. The opportunity costs of this project and the alternatives that could be developed by equivalent investment have not been tested in public.

I object because the whole planning and tender is a corrupted process. The process has not been transparent and the proponents and financial beneficiaries have been intimately involved in the process of "evaluation" and marketing of the project to the public. There has been no independent analysis or arms-length review, such as a treasury gateway process. This is further evidenced by the awarding of contracts for the project, notice of compulsory acquisition of family homes and the planned destruction of local communities; all before the matter has been properly considered and approved. It is also evidenced by the unseemly haste in which the EIS has been prepared and the even further "haste" with which the community is expected to respond to a very large and multilayered set of documents.

I object that the EIS has in large part been prepared by AECOM, whose reputation for impartial independent advice must be in serious question. How can the public have any confidence in a company that has recently settled claims against it with a \$280 million settlement because of inaccurate traffic forecasting for the RiverCity tunnel project in Brisbane?

The most disturbing outcome of M4 East proposal, coupled with the other assaults on community rights and the ability of the public to engage in decision making about their city, is the further distrust about governance and probity in NSW. The planning and development process of the M4 East project smacks of back room deals hidden behind the cloak of "commercial-in- confidence concerns", so that the public who pays for this are not truly involved in the decision making. **This is a fundamental core of my objection to what appears to be a flawed proposal.**

2. Initial Impacts

I object to how this process has been managed, since its inception, including poorly run community “engagement”. The “consultations” appeared more concerned with the marketing and media spin, rather than provision of information. If we were watching an episode of the television series “Utopia”, the dark humour may be appreciated. However the cruel impact of decisions, made by people who do not have to live with the consequences, is very disturbing for those that suffer the consequences.

The initial announcement of this project was made in the last quarter of 2013. The WestConnex Delivery Authority (WDA) conducted a series of information sessions near the proposed concept route. At that time, many local residents and businesses received letters that their homes/ buildings would probably be resumed for the project.

Many residents in Homebush, Concord, Ashfield and Haberfield considered these ‘consultations’ as being characterised by contradictory and misleading information. On multiple occasions, attendees reported that they received contradictory answers to the same questions from different staff at the information booths.

There was considerable distress amongst older residents at the prospect of being forced from their homes to an unknown and uncertain future.

There was an immediate deflation on local real estate prices in the affected areas. Some property owners who have rental properties were not directly advised of the intention for property resumption. They discovered from tenants about RMS plans for property acquisition. In some instances the owners discovered the resumption plans only when their tenants gave sudden notice. There are credible reports of other long-term owners in Haberfield and Concord being pressured to sell their properties for low prices, by WDA/RMS agents.

Many businesses faced uncertainty about their prospects and found that trade reduced quickly throughout 2014. The proposed resumption and demolition of a family run motel on Parramatta Road will be significant loss for the district.

In mid 2015, a large number of residents who had lived for over 18 months with apprehension about their homes being compulsorily acquired by RMS, were suddenly advised that their properties were no longer needed. Others who had not had any such notice received letters stating their properties would be resumed. This occurred in Ashfield and Haberfield. The cumulative and individual impact of proposed resumptions in Haberfield and Ashfield is significant. There is no proper analysis of this in the EIS. Many core agencies have not been consulted prior to the EIS. Some schools, local chambers of commerce and local social infra-structure providers have only been consulted since the release of the EIS. Others have not been consulted at all. **Hence, I object as the EIS is incomplete because the social impact assessment is seriously deficient and inadequate. It does not address the following:**

- **Lack of analysis of the Socio-economic impact:** The EIS identifies the social impacts on individual finances, health and loss of equity caused by compulsory land acquisition. It also concludes that this disadvantages the sick, frail, elderly and poor. It also concludes that property owners who seek to find property in the district are also disadvantaged by the limited time available to find suitable property. Despite this, remedies offered in the EIS are

limited and does little to identify how local residents can be properly supported. It appears to conclude that any social impact is just necessary collateral damage. There is no detailing of the socio-economic cost of these impacts. These need to be appropriately estimated and considered within a more comprehensive social impact statement. ***Those disadvantaged by the proposed measures must have appropriate financial restitution to compensate for current and future losses.***

- **Demolition of Apartments and social housing stock:** One impact particularly for Haberfield/Ashfield, and also Concord, is the proposed demolition of many apartments and social housing blocks. Haberfield will lose over 50% of its apartment dwellings, many of which house long term residents who are single people, elderly and others with special disability needs. There is little if any equivalent stock available for them to purchase or rent nearby. Many of the people being forced out their homes will have to find a new home some distance away from their established communities, in which they have lived for years. Compulsory acquisition processes are already being implemented on local residents. Families, friends and neighbours are being separated. So while the impact is most significant for the 400 or more people who are being forced to move, it also affects the thousands who remain behind in their once shared community. ***Housing stock needs to be replaced and made locally available for people on low incomes.***
- **Supports for those affected by proposals:** The EIS suggests WestConnex would offer a counselling service to those impacted. This is somewhat akin to a person assaulting another and then offering counselling to the assaulted person! ***The only reasonable support to offer is independent financial, legal, counselling and social support to affected people. There must be payment of full and appropriate sums to compensate for all imposed losses.***
- **Destruction of Urban Heritage in Historic Conservation Area:** The heritage report identifies that many historic houses to be slated for destruction are in Haberfield and Ashfield. This will result in a permanent scar on the historic fabric of the world's first garden suburb, and also cut off the western corner of the suburb from the rest of this treasured precinct. The EIS states that this proposal will have a major adverse impact on Haberfield and the overall project will 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 p 19-11, 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 actions cannot be fully mitigated."*) ***I object to the destruction of parts of the Haberfield Conservation Area and the overall loss of integrity of the Area.***
- **Loss of Community:** The EIS itself says in 14.4.2, "Changes to the amenity of a street or suburb can negatively impact the sense of belonging and identity of its residents and consequently their cohesion and connectedness. Areas with heritage values can also be a significant contributor to local character and community sense of place. Impacts on heritage assets affect not only the value of the assets, but the value communities place on the quality

of their environment, and their connections to it, both past and present.” “These impacts are primarily along the M4 corridor in Homebush at the western and eastern ventilation facilities, Concord Road interchange, and Parramatta Road and Wattle Street interchanges.” It describes that the impacts for Haberfield are “major adverse impacts” with the whole project having cumulative adverse impacts. ***It proposes no solution or restitution for this impact. This is not acceptable and I object to this unwarranted impact..***

- **Ongoing implied forced acquisition of property prior to any official approval for the project:** in the last 3 weeks residents and businesses in Haberfield & Ashfield have received compulsory acquisition notices (PANS), which set a 90 day time frame for a negotiated settlement to be finalised, before legal proceedings would commence. Residents, who have lived their whole lives in the district, are being forced from their homes, often with what is considered inadequate funds to secure housing within the neighbourhood. Residents report that RMS employees are behaving in a forceful and what some consider a bullying manner towards them. They find it difficult to understand that given the EIS has just been released for community consultation, that planned acquisitions are being forced through, prior to any formal development of the project, and prior to any proper consideration of EIS submissions and response. Many believe the EIS process to be a sham formality. ***All property acquisition processes must cease until there is full release of the Business case to parliament and the public to allow appropriate analysis of the M4 East proposal and for transport alternatives to be properly considered. This must include a full socio-economic impact analysis that accounts for the true costs of the project and does not hide the costs borne by individuals if the M4 East project were to proceed. I object to this process.***

3. Construction related impacts

The size of the project is huge with a reported 65 hectare (650,000 square metres) project footprint. This includes clearance of 13 hectares of vegetation and established tree cover. ***I object to the removal of established trees and vegetation for this project and in particular the proposed destruction of healthy iconic trees in the Reg Coady reserve.***

- **Noise and Dust:** The EIS discusses a construction period of 3 years. It proposes 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 1.7 million cubic metres or some 16 million tonnes of spoil are removed. It is also proposed that trucks run up and down Wattle Street adjacent to residential areas where traffic is usually light between 9 pm & 6 am. ***I object to the proposed 24 hour spoil removal by truck. There must be respite from this process, from 9pm to 7am.***
- All the trucks from Haberfield/Ashfield would congregate in Concord through Homebush and beyond for 24 hours a day, subjecting many people along that corridor to extended period of noise & dust. Current proposed mitigation measures for this cumulative impact is inadequate. ***Appropriate noise mitigation through double glazing and sound proofing on individual homes is required. Trucks must be fully covered and all trucks should be washed, on the body of the truck and around the wheel bay & tyres, before entering road ways and distributing silica based dust. This will also require installation of high capacity dust***

filtration on air-conditioners. The capital and recurrent operating costs should be borne by WDA/SMC.

- **Vibration & potential damage to homes:** There is significant local resident concern on the impact of tunnelling beneath and around properties and the possibility of structural damage to old homes. The assessment of properties for which structural condition reports are provided needs to cover a greater area than is proposed in the EIS. ***There must be independent structural assessment of all houses in the region of the proposed tunnelling and blasting (within 200metres either side of the tunnels and construction areas). All damage must be compensated with full remediation.***
- **Destruction to Neighbourhood and Community:** The grief and mourning caused by the forced breakup of family kinship and community ties will be long-lasting and inter-generational. ***If the project proceeds a health monitoring study must start now and monitor the health and well-being of all local residents who remain and those displaced to ensure that health impacts are kept under close scrutiny.***

Health Impacts of Construction

I object to this project because a number of health impacts resulting from this project are not satisfactorily addressed in the EIS.

- Sleep Disturbance; if heavy truck movement is permitted on a 24 hour basis, it will disrupt sleep patterns for many local residents. Poor sleep is associated with a raft of health impacts, including increased blood pressure, increased cholesterol levels, impaired work performance, increased anxiety & depression, and relationship stress and breakdown. ***There needs to be a truck operation and movement curfew between 9pm and 7 am, along with noise mitigation described above. I object that the EIS does not address this problem.***
- Respiratory Irritation due dust: Spoil removal from tunnelling will increase dust locally and this will impact on general respiratory health, particularly for young infants and children and those with pre-existing heart & lung conditions. ***There needs to be appropriate glazing and air filtration mitigation as proposed above. Trucks must be fully covered and all trucks should be washed, on the body of the truck and around the wheel bay & tyres, before entering road ways and distributing silica based dust. In addition round the clock monitoring of local air quality is required and residents should be alerted if dust levels are raised at certain times. I object that this problem appears unaddressed.***
- Mourning & Grief over loss over home & community: This will be an enduring influence on many people, including those forcibly moved and those that remain. It will also increase the risk of both anxiety and depressive conditions. The loss of home and community attacks a basic need for all humans, to have stable shelter and accommodation. Many people believed that a home within the confines of the Heritage Conservation area would safe-guard them from such destruction and vandalism of their community as proposed by the M4 East project. ***The lack of any proposed mitigation for this major impact is a serious deficiency in the EIS. It requires appropriate address and resolution. There should not be any progress on the project until this matter is satisfactorily addressed and appropriate restitution made to affected residents. I object that this impact has not been given necessary consideration.***

- Anxiety about impact on homes: The ongoing work, associated, with blasting, tunnelling and spoil removal will leave many remaining residents anxious about the security of their own homes, probable financial loss and reduced ability to care for themselves and their families' future. ***I object that this problem has not been addressed.***
- Impact on Family life: The loss of close family and friends from an immediate neighbourhood diminishes the quality of life for many people. Increased isolation, particularly those who were in their own or rented flats will be associated with increased health morbidity. ***It is most likely that the initiation of the project will hasten the death of many elderly residents if they are displaced from their long-standing homes and community. The lack of a clear and compassionate plan to deal with these major problems is a serious deficiency of the EIS. I object that this issue has not been addressed.***
- ***If the project proceeds a health monitoring study must start now and monitor the health and well-being of all local residents who remain and those displaced to ensure that health impacts are kept under close scrutiny. In particular the impacts on children need to be carefully monitored, particularly impairments on school education performance.***

4. Post Construction related impacts

I object that even when the M4 East is completed, the traffic congestion impacts in the Haberfield/Ashfield localities will not have improved.

Once the project is completed in 2019, the Haberfield/Ashfield sector will remain significantly impacted as the increased induced traffic will funnel into 2 already crowded corridors, namely Parramatta Rd and Dobroyd Parade. Proposed new right hand turns at Ramsay Street & and Waratah St off Wattle Street will increase through traffic in what is a residential suburb. The EIS also notes in its cumulative impact section (26), that there would be greater traffic densities along both the Eastern sector of Parramatta Rd and Wattle St when the whole project is complete. This appears to contradict other assertions about the localised benefits. It also 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 consequence of this project and identification of what remedies or solutions are proposed. The project should not be approved to proceed until these matters are satisfactorily addressed.***

5. Unanswered Questions

I object to the current proposal because the EIS fails to satisfactorily address a number of significant concerns about ongoing health impacts:

- **Localised noise hot spots:** The redistribution of traffic and focussed portal entry & exits will cause concentrations of noise. In addition ventilation fans and exhaust stacks will create new noise sources that will require monitoring. Ambient noise will combine and effect the Haberfield/Ashfield interchange and Concord interchange zones. ***This information should be clearly spelled and readily identified and appropriate mitigation planned.***
- **Ongoing sleep disturbance:** The localised hot spots will contribute to ongoing sleep disturbance with health impacts that are known and documented

- **Localised Pollution hotspots:** The Portal entry and exits will create localised pollution hot-spots. In addition until the project is complete, as described above there will be ongoing increased traffic in Parramatta road east of Bland Street, which will cause local problems. ***Again detailed information of these impacts is required along with mitigation proposals.***
- The EIS does not provide data on PM2.5 pollution in localised areas, except from 24 hour averaged data. The WestConnex website provides data from June-August 2015 on 5 sites, but again only provides PM data on a 24 hour averaging basis. Peak levels during the morning and afternoon travel peaks on an hourly exposure basis are not made available. ***The hour average data of PM2.5 exposure is required because this is when children and parents are often walking to school.***
- **Exhaust stack plume dispersal:** If we accept the assertion in the EIS that the exhaust ventilation tunnel will for the most part allow for reasonable distribution of pollutants away from the immediate vicinity, several issues of concern remain.
- The first is ***what is the impact of intense localised plume strikes onto small areas, which will cause often short, but quite intense concentrations of pollutants in a restricted area, due to changes in wind patterns or atmospheric inversion layers?*** These acute events can be a major trigger for acute asthma episodes or people with other chronic lung conditions.
- A further related issue is that plume strikes will more frequently hit high rise buildings, so projected high rise apartments along the Parramatta Rd corridor, especially at Kings Bay, Burwood and Homebush, will be more likely to be affected than low rise housing. ***What will be done to mitigate exposure to residents in the proposed high rise buildings under the Urban growth plans?***
- The third issue is, ***do these pollutant plumes continue to contribute to the adverse air quality conditions in the SW of Sydney?*** So is the claim of an improved local air quality in in the inner west, done at the expense of a worsening of the air quality in the South West, due to the prevailing air movements?
- The EIS does not consider the impact of traffic growth along the Parramatta Road corridor following the proposed developments proposed by Urban growth for the corridor. How will air quality improve if traffic volumes build up due to increased population densities proposed for the corridor?
- **In Tunnel exposure to pollutants.** The EIS identifies the pollutant exposure for the Concord-Haberfield journey. However, there does not appear any recognition of cumulative exposure for people such as transport and taxi drivers, once all proposed tunnel projects are complete. If a person takes a return trip from Hornsby to the airport via NorthConnex & WestConnex, over half the journey by 2023 will be in a tunnel. So there would be some 40 or more minutes spent driving in a tunnel on a return trip. What will be the cumulative in-tunnel exposure from such a lengthy trip? Or if a taxi driver does this trip three times in a day, the exposure may even be longer; say a minimum of 120 minutes of in tunnel ambient exposure. How would the cumulative impact accrue in terms of NO2 or CO exposure. ***Would there need to be advisory information to limit in-tunnel exposure to less than 60 minutes per day?***
- **The lack of analysis about particulate matter pollution.** The EIS raises a number of contradictory issues about PM monitoring. The EIS argues that the NSW approved methods has no requirement to measure PM2.5. In fact much of the analysis is done on standards

promulgated in 1998, and probably on science that is over 30 years old! There have been huge advances in knowledge and measurement technologies, that this raised questions about claims that this project is being based on world's best practice. The air quality standards proposed in the EIS do not appear to match the proposed levels contained in the revised National Environment Protection (**Ambient Air Quality**) Measure, which would be equal to world's best practice (eg a 24 hour exposure to PM2.5 of 20 microgram/m3 instead of 25 microgram/m3). ***The EIS should apply the proposed levels which are to be implemented across the country later this year, rather than the current out dated levels used in the EIS.***

- **How were vehicle exhaust predictions calculated?** Did the EIS calculate motor vehicle exhaust emission in tunnel based on the proposed mix of vehicles and the type of emission under varying operating conditions as supplied by vehicle manufacturers? ***Were any of the calculations based on what we know to be false and misleading data from companies such as VW?***
- **We know that there is no safe limit to most exhaust emission exposure.** They contribute to both increased rates of cardio-vascular disease and lung conditions, including lung cancer, which is now increasing amongst non-smokers.
- **Diesel exhaust emissions are carcinogenic.** Modern Diesel exhaust consists mostly of particles sized PM0.5 and smaller (i.e less than 0.5 micrometer, at least one fifth smaller than PM2.5). There is no measurement of the quantity of these particles which drivers will be exposed to in tunnels. These particles penetrate into the blood stream and long term effects are not well known. ***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 will be exposed to in tunnel and via the tunnel exhaust vents. There are mitigating technologies that reduce in-tunnel and from tunnel exhaust ventilation stacks, by the use of electronic precipitators, which if designed from the start would work satisfactorily, as they do in Madrid and Hong Kong. Also carbon filtration can reduce Nitrous oxide build-up both in tunnel and from exhaust.***
- **Diesel vehicles may need to be banned from the tunnels and also from our urban environments.**

IN SUMMARY

The EIS clearly outlines the enduring and destructive impact that the WestConnex project will have on the lives of many people. The loss of heritage items will be irreplaceable. The social connections and networks of families and friends will be disrupted. No meaningful mitigation is proposed. The central argument of the project proponents is that the perceived benefits will make Sydney a better place to live and work, so presumably, although it is not stated explicitly, the enforced sacrifices on several hundred thousand residents of the inner west justifies this outcome. The proponents do not give any real evidence to support this thesis and to date no business case, with all the socio-economic costs and benefits, has been made available. In fact it would appear that the proponents are pushing ahead with the project in spite of clear external critiques and with no logical rebuttal to the critics.

The so-called social impact analysis in the EIS is markedly deficient and requires to be re-done if it is to meet the requirements of the SEARS, and what the community is entitled to expect from proper EIS process.

The project has already had an impact on the health and wellbeing of local citizens. Many residents have reported becoming anxious, angry, depressed and resorting to medication. There will be further health, social and economic consequences on a greater scale if construction activities remain unmodified, particularly in regard to 24 hour heavy vehicle movements and tunnelling work. Even when the M4 East is completed, local pollution and noise hot-spots will remain; east of Bland St and along City West link will be as congested as ever, with increased the capacity coming to a stuttering halt at those 2 choke points. Improved public transport plans for Parramatta road corridor are not even planned to be operational until 2031.

As outlined there remain too many adverse impacts and unanswered questions about the health impacts of this project. From a health and welfare perspective, this is a slow moving disaster for local affected communities. The disaster is easily avoidable and should be avoided by not proceeding headlong with this project. It is the wrong project at the wrong time for Sydney. Let us stand back, take a deep breath and work collaboratively, using proper planning principles, to design twenty-first century transport solutions for our communities and metropolis.

Victor Storm, October 28 2015

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