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Submission to M4 Widening Environmental Impact Statement

To Whom It May Concern,

Thank you for the opportunity to make a submission on the Environmental Impact Statement (EIS) of the M4 Widening stage of the proposed WestConnex project.

I am making this submission in my capacity as a Greens MP and spokesperson for Transport, Roads and Freight.

In my capacity as a Member of Parliament, I have been talking to communities throughout the Inner West, Western Sydney and across NSW and they have expressed enormous concerns regarding the impacts of this project.

The WestConnex toll road project is flawed in a number of crucial ways, demanding that it be rejected and funds be diverted to integrated transport solutions that actually address congestion and mobility issues in Sydney. Investing billions of dollars in one urban toll road is wasteful and will starve Sydney and regional NSW of much needed improvement in transport.

I have a number of concerns regarding the proposed project:

- Planning of WestConnex lacks transparency and has produced a project that does not meet the needs of NSW
- WestConnex is not an integrated transport solution and does not follow integrated land use planning principles
- There is no clear economic, social or environmental benefit to building WestConnex
- Alternatives to WestConnex, including rail freight, have not been adequately investigated
- The M4 Widening stage of WestConnex will not reduce congestion
- Cumulative impact of the full WestConnex project has not been assessed, including air pollution from exhaust stacks

These concerns, regarding WestConnex, and specifically the environmental impact statement for the M4 widening, are discussed in detail below.

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1. Planning of WestConnex lacks transparency and justification

WestConnex has not been planned in a transparent manner. Communities across Sydney are demanding evidence and justification for this $15 billion dollar toll road project.

The government's refusal to release the full business case, cost benefit analysis and traffic projections for WestConnex, the largest infrastructure project in Australia, only serves to diminish community confidence in this project.

Cost benefit analyses should consider and compare the alternatives options that are available to solve the congestion problem in Sydney, however these have not been made publically available for any stage of the WestConnex project.

The little information that has been publicly released, most notably the Business Case Executive Summary and the Strategic Environmental Review documents, has not substantiated the environmental, social or economic justification for WestConnex.

The final route of the full WestConnex project is still unknown, yet the toll road project is justified based on the purported benefits of the full project. Currently, the proposed subsequent stages to the M4 Widening are the M4 east and M5 east, yet details of the route for each remain unclear with northern and southern links proposed for both.

Additionally, the cumulative impacts of the full project have not been investigated although the full project design is used in its justification. Further, transparent investigations into alternatives to the full WestConnex project or the M4 Widening stage such as public transport improvements, rail freight, demand management or smart planning have not been conducted as part of the EIS.

Given the billions of dollars of public money used to fund the construction of the project and the duration of tolls placed on users, this information should be released to the public. The project should not proceed any further until full justification, the cost benefit analysis, traffic forecasts and alternative options have been made available for public scrutiny and found to stack up.

2. WestConnex follows neither integrated transport nor integrated land use planning principles

Integrated transport planning and the alignment of transport and land use planning are central components of the NSW Long Term Transport Master Plan (a document used to justify the project). However, the WestConnex project fails to deliver on both.

Integrated transport planning is multi-modal and customer-focused, aiming to allow customers to reach their destination quickly and seamlessly whilst minimising the impact on the community and environment. WestConnex is not an example of integrated transport planning as it is restricted to one mode, does not reduce congestion for car-users and impedes access to surrounding public transport options for others in the community.

Alignment of transport and land-use planning has also not been adequately considered in the planning, justification and viability of WestConnex. On the one hand the Government's planning reforms together with its draft Sydney Metropolitan Strategy would allow unfettered overdevelopment in a 100 km^2 zone along Parramatta road, allowing developers to run the show while community and environmental controls are removed. And on the other hand, the impact of this proposed urban activation around WestConnex and the proposed North Parramatta development have not been incorporated into the analysis of congestion or use of WestConnex and the requirement for public transport connections or improvements based on this land use.

Many other cities around the world have a goal of moving towards sustainable urban motility, which involves the planning of people-oriented cities rather than car and freight movements. A dedication to transit-oriented and mixed-use development principles could ensure that new jobs and homes are created in areas with reliable and frequent public transport, thus reducing the contribution of Sydney's predicted population growth to congestion. However, the EIS has dismissed planning and demand management as complementary initiatives that can take many years to achieve (M4 Widening EIS Chapter 4.2.4).

Cheaper, more effective and sustainable alternatives to the WestConnex project include park and ride facilities, increasing the number of grade-separated services such as busways, light rail and cycleways, improving the frequency and reliability of current train services, increasing patronage on the airport line by removing the station access fees, increasing pedestrian access to public transport, effective freight transport strategies (including a transition to rail-freight as a predominant mode and smart intermodal terminal planning) and a public transport plan for Western Sydney.

Alongside the roll-out of electronic ticketing in NSW (Opal) the Government could also implement integrated fare systems and timetabling that would encourage more commuters to make multi-modal public transport journeys.

3. There is no clear economic, social or environmental benefit to building WestConnex.

Economic justification/viability:
Toll roads with similar lack of justification (e.g. the Lane Cove Tunnel) have failed to meet traffic volumes to be economically viable, a trend repeated globally (Prozzi, *et al.* 2009).

By 2020, the economic cost of road congestion is predicted to rise to $8.8 billion annually for Sydney (M4 Widening EIS Chapter 3.3.2). Historical preferences for road infrastructure projects in Sydney have not reduced the rising cost of congestion, and WestConnex does not provide a lasting solution to congestion.

Alternatives to toll roads can provide the marginal road traffic reductions necessary to alleviate congestion. However, the EIS does not adequately consider public transport alternatives and largely dismisses them (M4 Widening EIS Chapter 4.2.3) despite evidence from other global cities and the investigative rigour demanded by the size, scope and cost of the full WestConnex project.

Socio-economic considerations:
The effect of the reintroduction of the M4 toll on different socio-economic groups in the region has not been considered, even though this is especially pertinent regarding the large number of households with high oil and mortgage vulnerability in the region.

The EIS incorrectly highlights socio-economic benefits from the project via increasing access and connectivity to social infrastructure (e.g. health, sport, recreation and education facilities), local businesses and work as these benefits would only be available to car-users able to pay the M4 toll.

Households surrounding but not purchased for the construction of the WestConnex project have been inadequately consulted although they will be forced to endure the long construction period, increased traffic and pollution and are deemed ineligible to receive any financial compensation. Another major issue is that this project will erode community cohesion forcing long term residents to relocate for little gain.

Reimbursements for properties acquired to build WestConnex are unfair as they have assumed affected householders will be able to buy like for like housing in the area when they will most likely lose value on their properties. Further, with changes now announced to the route for the M4 extension, there is much uncertainty about how many and which households will be acquired for this stage. This situation is inevitably having an emotional toll on many residents around the proposed project location.

The cost of driving is not limited to tolls and congestion; there are many personal financial contributions to driving that are not considered in the justification of the project. Further, the

socio-economic benefits of alternatives to the WestConnex project have not been investigated despite the associated savings of increased public transport provision for commuters.

Mobility considerations:
A 2011 study into active transport use in Queensland found $2.10 and $3.51 of associated health benefits from 1km of walking and cycling respectively, investing in pedestrianisation and improving cycling access around transport hubs would help to meet NSW 2021 Goal 11: *Keep People Healthy and Out of Hospital*.

The mobility needs of an ageing Australia are not considered by the WestConnex project, although one in five Australians will be over 65 by 2031 and may face barriers to driving a car (NRMA). Investment is needed to make public transport accessible and affordable for an ageing population with comprehensive service coverage, ease of access and user-friendly timetable information (TRACEY, 2013).

Air quality, environment and safety considerations:
The EIS recognises that increased congestion on Parramatta Rd due to toll avoidance on the M4 will increase the concentration of traffic-related emissions on Parramatta Rd under both the M4 Widening and full WestConnex scenarios. However, the EIS has not investigated air quality changes to other roads that will receive increased congestion due to toll avoidance on the M4 and the effect of this reduction in air quality on the local community.

Monitoring sites disparate to the location of the M4 Widening project (at Prospect, Chullora and Rozelle) were used to model the changes to air quality. This inaccurate modelling is not sufficient considering the scope and expense of the project.

Figure 6.6 in the Traffic and Transport Report for the M4 Widening EIS shows that the project will lead to fewer heavy commercial vehicles (HCVs) using the M4 once it is widened and tolled. It is crucial that the impacts of increased local road HCV movements on air quality and road safety on these local roads is thoroughly investigated before the project is approved. Furthermore, the benefits of a transition to rail-freight on air quality should be investigated.

Under a full WestConnex scenario (details still unknown) there will be multiple ventilation stacks to ventilate the proposed tunnels. The impact of these ventilation stacks on the communities surrounding them has not been assessed and should be before any full WestConnex scenario is approved or used to justify earlier stages of the project. Further, cumulative impacts of the full WestConnex project have not been calculated.

Finally, the project does not recognise or work to reduce the high levels of transport-related greenhouse gas (GHG) emissions in NSW.

4. Rail-freight alternatives have not been adequately investigated

The details of how WestConnex will service the expanding freight task at Sydney Airport and Port Botany remain unclear. Thus, the ability of the full WestConnex project to support the road-freight task in these locations should not be used to justify the M4 Widening project.

Heavy commercial vehicles cannot be forced to use WestConnex and the EIS modeling highlights that these vehicles may choose to use local roads to avoid the tolls on the M4 (Figure 6.6 in the Traffic and Transport Report). Businesses in the region have freight delivery requirements. Developing an effective intermodal freight strategy for the region could ensure that only necessary heavy commercial vehicle movements occur on Sydney's roads and these vehicles aren't being diverted to local roads. Reducing the presence of heavy commercial vehicles on local roads will improve road safety and the health of local communities (NSW 2021 Goals 10 and 11). A dedication by the Government to investing in rail-freight solutions to congestion would work towards fulfilling these goals.

Shifting to rail-freight would benefit congestion and the economy. Rail freight has almost five-fold less social and environmental costs compared to road-freight. The EIS highlights that the current plans for improvements to heavy rail connections to Port Botany will not be sufficient to meet the demand. Port Botany currently handles 95% of container movements in NSW. 98% of imported containers and 60% of exported containers have their origin and destination within Greater Sydney. Designing an effective intermodal freight solution for NSW would reduce the predicted increased need for road-freight transport.

5. The M4 Widening stage of WestConnex will not reduce congestion:

Congestion is predicted to increase in Sydney due to population growth, urban sprawl and lack of concomitant frequent, reliable and integrated public transport service planning which inevitably forces the majority of Sydney's residents to have car dependent lifestyles.

Any reduction in travel times reported in the EIS will only be available to those able to pay the M4 toll, with travel times increasing on surrounding roads. Widening the M4 will shift congestion onto Parramatta Rd and surrounding roads due to toll-avoidance. Further, the congestion bottleneck will only be moved down the M4 towards Parramatta Rd. Under the full WestConnex scenario, high levels of congestion remain on Parramatta Rd and eventually return to the M4. This $15 billion project is not a solution to congestion in the region.

The Duck River crossing of Parramatta Road was used to model congestion in the EIS. As this site already has high congestion, this stretch of the road is not indicative of the whole of Parramatta road and hence the modeling does not accurately represent a future scenario where congestion on other parts of the road could increase by a much higher percentage than at Duck River crossing.

Additionally, calculations have been made using a route for WestConnex that has since been ruled out and should not be used to justify the project.

6. Encouraging a mode-shift to public transport is a viable solution to congestion and demands increased public investment

NSW has a goal to increase the patronage, frequency and reliability of public transport (see NSW 2021 goals 7, 8, 20) yet public funds are directed to WestConnex. A small mode-shift to public transport can have large impacts on traffic congestion.

The Sydney rail network is predicted to reach moderate to very high levels of crowding (causing "material reliability impacts") on the Western Line by 2031. Moreover, the Parramatta Road corridor handles twice as much travel per person than the metropolitan average. These predictions demand improvements to public transport in this region and have not been compared or investigated in the M4 Widening stage of the WestConnex project.

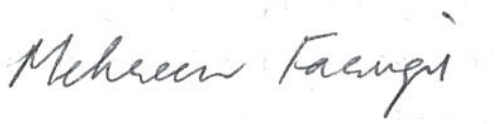
The project is justified on benefits to freight transport, even though the main category of vehicles using WestConnex will be private cars. Significant reductions to congestion can be delivered not by investing in toll-roads but by investing in public transport improvements to encourage drivers who have the option of shifting modes to public transport.

In the western section of the Parramatta Road corridor, where the M4 Widening is proposed, travel is predominantly car-based. Public transport accessibility in this western region is the lowest for the entire corridor, with significant areas outside walking catchments to public transport (measured as an 800m walk to heavy rail, light rail stations and ferry wharves or 400m walk to a bus stop). Additionally, as the vast majority of trips to the Parramatta CBD originate in the western section of the corridor, the beneficial reductions to congestion in the corridor produced by fast-tracking the Western Sydney Light Rail proposal or the rollout of Sydney's Bus Future (including grade-separated bus services) should be investigated and compared to the proposed M4 Widening stage of the WestConnex project. An investigation into the costs and benefits associated with implementing these recommendations that work to shift drivers to public or active transport should be conducted.

In conclusion, WestConnex in any of its stages is not the solution to Sydney's traffic congestion and should be firmly opposed. The government needs to invest in real integrated public transport to promote a mode-shift from private cars and in necessary rail- freight infrastructure to reduce congestion and increase road safety in our communities.

Again, thank you for the opportunity to comment and outline the reasons for my opposition to this project. If you have any questions, do not hesitate to contact my office for further information.

Kind Regards



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