

WESTCONNEX M4 WIDENING APPLICATION NO SSI 13_6148

ENVIRONMENTAL IMPACT STATEMENT (EIS) SUBMISSION

Ashfield Council acknowledges that the physical works arising from the M4 Widening are unlikely to have a direct impact on the Ashfield LGA, however, there are issues resulting from the release of the EIS and flow on effects from the widening of the M4 and future stages of the WestConnex project that the Council wishes to comment on which form the basis of its submission to the Department of Planning & Environment on the EIS.

1.0 Traffic and Transport

1.1 Direct Ashfield impacts

The proposal to increase the capacity on the M4 Motorway has the potential to encourage increased private vehicle use, particularly for trips between western Sydney and the inner west.

The EIS acknowledges that the reintroduction of a toll for the M4 will result in some motorists choosing alternate routes from Sydney's west to the inner city to avoid paying the toll. This is expected to result in an increase in traffic volumes along parallel traffic routes, in particular Parramatta Road and Victoria Road.

Parramatta Road, from the termination of the M4 at Concord to the City West Link, has limited capacity to accommodate increased traffic volumes. However, by widening the M4 to accommodate more capacity, it follows that more vehicles will be encouraged to use the motorway and Parramatta Road will see resultant traffic volume increases that will flow through to the inner west. There is therefore potential for major road links and junctions in the Ashfield LGA and within the Parramatta Road catchment to experience increased congestion. Parallel 'rat run' routes are also likely to see an increase in traffic volumes as more traffic and congestion on Parramatta Road will see it become an even less attractive route from Sydney's west.

1.2 Future Ashfield impacts

The WestConnex M4 East Stage, which is intended to follow the M4 widening works, will result in significant traffic and environmental impacts on the Ashfield LGA through the relocation of the M4 'terminus' from Concord to the inner west - particularly in relation to the suburbs of Ashfield and Haberfield. A more detailed response will be prepared by the Council following the release of the associated EIS for M4 East.

2.0 Air-Quality

An increase in traffic volumes filtering through to the inner west and more traffic congestion is likely to result in further deterioration of air quality along the Parramatta Road corridor and throughout the Ashfield LGA. The air quality assessment in the EIS is focused primarily on the area within the immediate vicinity of the M4 widening. There is no broader analysis of cumulative impacts of air quality outside of the immediate project works area which could impact on communities further east of the project site.

3.0 Health Impact Assessment

The EIS does not appear to address potential health impacts arising from the M4 widening, possibly because the DGRs issued for the project do not go to a requirement for such an analysis. NSW Health has developed Health Impact Assessment (HIA) guidelines to inform the assessment of a development, program or policy on the health of the population. The DGRs required the project proponent to consult with NSW Health during the preparation phase of the EIS but there does not appear to be any information which outlines, what, if any, response may have been received.

4.0 General comments

4.1 EIS Exhibition

While it is acknowledged that the EIS has been exhibited for the required statutory period of 28 days, a project of the significance of WestConnex, with its major external regional impacts, should be available for public review and comment over a much longer period - at a minimum of two but preferably three months.

The M4 widening EIS, which arguably addresses one of the less complex phases of the WestConnex motorway project, includes many volumes of data, analysis and technical information. The EIS no doubt took many months to put together. It therefore stands to reason that the public notification and engagement phase of the assessment process needs to go beyond minimum statutory requirements. This will be particularly relevant for subsequent stages of the project.

4.2 WestConnex Broader Context

The EIS for the M4 Widening needs to be considered in the broader context of the WestConnex project - i.e. the subsequent stages. Using this approach the EIS would be required to address broader environmental, traffic, air quality, health, economic and other impacts and thereby facilitate a more realistic and relevant approach to cumulative impacts across the project's influence. As it stands, the EIS solely addresses the route between Parramatta and Homebush and is therefore limited in its focus and scope to address broader impact issues.

4.3 Economic Impacts

No detailed business case or toll sensitive analysis has been included in the EIS other than reference to an executive summary from the WestConnex Business Case which looks more broadly at the overall WestConnex scheme. Consequently, it is difficult to ascertain the economic impacts arising from just the M4 Widening component and potential broader impacts on the road network east of the M4 are therefore unknown. In addition, there is no reference to related economic impacts from major urban renewal projects currently being considered for the Parramatta Road corridor which are linked to the WestConnex motorway. These projects have the potential to significantly alter traffic demands and generation within the corridor, impact on public transport use and demands and general access within the corridor.

4.4 Environmental impacts

The EIS indicates that the M4 Widening will not have any substantial, unmanageable, environmental impacts. Particular emphasis is placed on the resultant improved traffic flows which will reduce air pollution by reducing congestion. However, while this may be relevant for the M4 widening section of WestConnex, it may not hold true for the Parramatta Road corridor east of the termination of the M4. As mentioned previously in this submission, no detailed analysis has been undertaken of longer term environment impacts arising from increased traffic volumes and congestion east of Concord should the subsequent stages of WestConnex not proceed. The only comment appears to be an acknowledgement that there will be an overall increase in emissions when comparing the completed scenario with the not completed scenario.

In addition, the EIS does not analyse the impacts of increased travel demand resulting from the capacity of the existing M4 being increased through the widening works.

Contact: Phil Sarin - Director Planning & Environment