

Submission: WestConnex New M5 Environmental Impact Statement (SSI 14_6788)

To the Director, Major Planning Assessments, Department of Planning

I write to express my strong objection to the WestConnex New M5 motorway proposal.

International experience of major toll road construction has demonstrated conclusively that these projects are incredibly expensive and do not reduce congestion in the long term. WestConnex will increase air pollution and encourage more car use, quickly filling the increased road capacity, this has been proven on other roads like the M5 and M7. It is not a long-term solution to Sydney's congestion problem.

I object to the fact that my taxes have gone to help the State Government sign multi-billion dollar contracts for WestConnex before the EIS was placed on public exhibition. This is not democratic and undermines transparency and community confidence that this is a genuine consultation process.

This EIS only considers benefits for the project stages but does not address the negative impacts along the whole route, one of which, more traffic in the inner west directly impacts me, my family and my community.

I object to this proposal because:

- 1) The New M5 will have devastating impacts on our local communities and local amenities.
- 2) The New M5 will be a massive contributor to greenhouse gas emissions, while destroying important habitat and greenspace.
- 3) WestConnex and the New M5 is a financial black hole that won't solve Sydney's traffic congestion.
- 4) The WestConnex project including the New M5 lacks transparency and accountability.
- 5) The WestConnex project comes with no real evaluation of alternative options such as world class public transport.

1) The New M5 will have devastating impacts on our local communities and local amenities.

The New M5 will have irreversible detrimental impacts on surrounding suburbs and communities, including my own community in Redfern - Waterloo. It will result in more traffic congestion on existing key roads; major projected increases in traffic volumes into local roads and streets; increased pollution; displacement through forced acquisitions; negative impacts on business precincts due to inevitable clearways on major commercial strips; and significant loss of green spaces, existing parklands, mature trees and biodiversity.

From 2019, the New M5 and the existing M5 will be routed through to the proposed St. Peters Interchange. Up to 100,000 extra vehicles will be forced onto local roads, particularly onto south King Street in Newtown which will be unable to accommodate such a massive increase in traffic. This will directly affect my standard of living in Redfern and my child's school experience in Newtown. Stage 3 of WestConnex (joining the M4 and M5) is not planned to be completed until 2023 and is predicated on the sale of Stages 1 and 2 and the imposition of significantly high toll fees for decades. There is no certainty that it will even be built, leaving local inner west suburbs in constant gridlock and residents subject to unacceptable levels of dangerous pollution and destruction of their amenity. I was in King St Newtown last night and it was gridlock for 2 hours in afternoon peak hour. There is no way drivers will want to stay on this already congested road and will find back routes into our village communities of St

Peters, Erskineville, Alexandria, Waterloo and Redfern to name a few. In St. Peters alone there will be more than 2,200 extra heavy and light truck movements per day for years. This will also have health impacts for our children who have to live, play sport and attend school in these areas.

2) The New M5 will be an extremely large contributor to greenhouse gas emissions, while destroying important habitat and greenspace. This directly contradicts world views and political will to reduce greenhouse gas emissions to avoid disastrous global warming, sea level rise and changes in climate.

This proposal will contribute large amounts of greenhouse gas emissions, promoting global warming, making us the laughing stock of the rest of the developed world. It will encourage greater use of private cars, leading to increased fuel consumption and air pollution throughout Sydney. It will also increase demand for car parking, taking up valuable open space which is already in short supply in inner Sydney.

The impact of the New M5 on the largest green space in the inner west, Sydney Park is a major pitfall of this project. As well as losing a significant portion of this park, there will be tunnels, ramps, ventilation stacks and multi-lane roads with fast moving traffic, immediately bordering the park. This will make visiting and using the park much less user friendly. Many residents and visitors to this iconic area of Sydney will be cut off from the park by the St Peters interchange and the widening of Euston Road to seven lanes between Sydney Park Road and Campbell Road. All park users and local residents will be subject to high levels of pollution and noise. I regularly use Sydney Park for kids parties, recreation and relaxation. The proposed WestConnex will make it harder for me to access the Park from Redfern, whether by car or bicycle, will make it more dangerous for my child to get there on his own and detract from our outdoor experiences while we are there.

Recently it was announced that another 350 trees and 6,000m² of land will be accessioned from Sydney Park to be added to the 8,000m² already allocated. This may be deemed 'non-permanent' by the State government's spokespeople, but the timeframe of the project is decades and this is not an appropriate use for a public park in such a closely settled area of inner Sydney where large areas of open space is rare and intensively used.

The WestConnex project will also lead to the destruction of more than 75 hectares of vegetation, including endangered Turpentine Iron Bark Forest and the critically endangered Cooks River Castlereagh Iron Bark Forest. The habitat of the vulnerable Green and Golden Bell Frog at Kogarah Golf Course at Arncliffe will also be slashed by the New M5. This is a disaster for inner Sydney where our comparatively pristine natural areas should be a showcase of environmental sustainability for tourists and visitors. This is what brings people to our city, not multi-lane toll roads; we need to fully protect our natural areas for future generations.

3) Air pollution from the New M5 will be hazardous for our health

There is strong evidence about the dangers to human health from a wide range of vehicle exhaust pollutants, especially tiny particulate matter less than 10 microns in diameter (known as PM₁₀s), and particulate matter that is less than 2.5 microns in diameter (PM_{2.5}). These tiny particles can penetrate into the throat and lungs and are known to worsen heart disease and asthma, and cause cancer. The [WHO guidelines](#) state that small particulate pollution has health impacts even at very low concentrations and that 'no threshold has been identified below which no damage to health is observed. Therefore, the WHO guideline limits aim 'to achieve the lowest concentrations of PM

possible.' The State government should adhere to these guidelines to protect Sydney residents and visitors. Research has shown that people exposed to diesel exhaust at high levels in enclosed spaces for long periods of time – such as truck drivers, railway workers, and miners – face up to 40 per cent increased risk of lung cancers, even after the effects of smoking are taken into account (IOSH 2014).

Most state regulatory bodies in Australia accept there is no safe level of exposure to diesel exhaust. As well as cancer, other health hazards are respiratory illnesses and heart disease.

- The results of air quality modelling for annual average PM2.5 in the WestConnex New M5 EIS, indicate that there will be an increase in the levels of this particle pollution at 63% of receptors along the proposed route.
- During the construction period, the New M5 EIS states that there will be up to 1,000 extra heavy vehicle movements (trucks) per day in the Kingsgrove and Bexley surface works area and approximately 1,240 extra light vehicle movements. The health impacts on the community and on workers from this amount of concentrated particulate pollution from diesel fuelled vehicles will be significant and is not adequately accounted for in the EIS or the updated Westconnex Business Case.
- By 2031 when the whole WestConnex project is due to be completed, total traffic demand will rise significantly, for example, demand in St Peters will increase by up to 33% and there will be significant increases in traffic on key roads within the project perimeters including sections of Parramatta Road, Broadway, King Georges Road, Stoney Creek Road, Bexley Road, Forest Road, Euston Road and many more smaller roads in local suburbs.
- There is no evidence for the claim that there will be less emissions and pollution with WestConnex due to free flowing traffic so this claim cannot be used. Total two-way traffic east-west across this part of Sydney will jump 53% by 2031, this will not improve air quality.
- Unfiltered ventilation exhaust stacks will be located less than 500 metres from homes, public schools, childcare centres, aged care facilities and hospitals in the west, south west and inner west suburbs on the WestConnex route. Vehicles that use diesel fuel are responsible for around 80 per cent of fine particle pollution from vehicles. According to a recent [ABC health report](#), the high hazard zone for health is considered to be 150 m either side of busy roads – particularly within 50 m. And, depending on the number of vehicles on the road, the levels can be up to 10 times higher than the usual city background – which is already at levels which are considered unhealthy. So the increases we can expect in dangerous air pollution by encouraging more vehicle trips and locating dangerous ventilation stacks next to homes, schools and hospitals, are completely unacceptable.
- The correlation between rises in particle concentrations and death rates from a variety of causes is proven with impacts that accumulate over a lifetime (IOSH 2014). Children are at greatest risk along with the elderly, and people with emphysema, asthma, and chronic heart and lung disease. I am concerned that this project will impact negatively on the health of our future generations placing more pressure on our health system.

4) The financial costs to NSW taxpayers for WestConnex have already blown out and will continue to do so, just like the mismanaged Albert “Tibby” Cotter Walkway in Paddington.

Global experience of major toll road construction has demonstrated conclusively that these projects are enormously expensive and counter-productive. Here in Sydney, taxpayers have pumped billions into the failed Cross City Tunnel, use of which is still well below project projections. The Albert “Tibby” Cotter Walkway costs blew out from 10 million to 38 million. The NSW Acting Auditor-General has identified multiple deficiencies in the business case and contracting for this walkway, which is now

rarely used outside event days at Moore Park. State government has not proved that it is proficient in managing these projects and they should be placed under much more scrutiny than has happened today.

Recent research from the Institute of Transport and Logistics Studies at Sydney University has warned the Government that Sydney motorists are unwilling to pay for more toll roads. Instead, motorists will look for free back-road routes, pushing more cars onto local streets. My suburb of Redfern will be directly impacted by this increased traffic and congestion, increasing travel times and risk to drivers, cyclists and pedestrians.

The WestConnex toll road has blown out from an initial projected cost of \$10 billion to \$16.8 billion and climbing. It will increase air pollution and encourage more car use, quickly filling the increased road capacity. It is not a long-term solution to Sydney's traffic congestion problem and as the most expensive transport infrastructure project in NSW, it does not address key community demands for efficient, inexpensive and world class public transport options. Rather it locks Sydney commuters into car dependency and use of privatised toll roads for decades to come while removing funds from public transport developments.

WestConnex does not offer sustainable solutions for the transportation of freight from Port Botany or Sydney Airport which is one of the primary rationales for the whole project. A recent Environmental Defenders Office presentation outlined that the Kingsford Smith Sydney Airport is targeted for closure once the Western Sydney Badgerys Creek Airport is at full capacity which further dismisses this claim. WestConnex does not offer faster transportation to Sydney Airport from the western suburbs and even the projected travel times using WestConnex are longer than the travel times using the existing rail infrastructure.

5) The WestConnex project including the New M5 lacks transparency and accountability.

The fact that the WestConnex Delivery Authority and now the Sydney Motorway Corporation have already signed multi-billion dollar contracts before this EIS and the previous M4 East EIS were placed on public exhibition, let alone given Development Consent, undermines community confidence that this is a genuine consultation process.

There are serious concerns about the way the WestConnex project has been developed and progressed regarding the lack of good governance, oversight and economic rationale for this major infrastructure project. The lack of transparency around the project, including state and federal governments' refusal to table documents detailing the cost-benefit analysis and traffic modelling used in the business case, is unacceptable. The project should not progress until this has been addressed.

The project's further planning and implementation will now be managed by the newly created private corporation, the Sydney Motorway Corporation. This will further obscure information about the project which should be openly available to the public. The NSW Minister for Roads, Maritime and Freight and the NSW Treasurer hold shares in this corporation is a conflict of interest, given that their role as public officers should be to ensure that public funds and public/private projects are placed under the highest scrutiny. These high ranking politicians should not be involved in this project due to the conflict of interest.

6) The WestConnex project comes with no real evaluation of alternative options such as world class public transport.

The Department of Planning's Secretary's Environmental Assessment Requirements (SEARs) demand that the New M5 EIS provide "an analysis of feasible alternatives to the carrying out of the proposal and proposal justification, ... (including an assessment of the environmental costs and benefits of the proposal relative to the alternatives and the consequences of not carrying out the proposal), and whether or not the proposal is in the public interest." This should be undertaken immediately before any further progress on this project occurs.

There is no apparent assessment of the environmental costs and benefits of the New M5 proposal relative to the alternatives and no adequate appraisal of whether the proposal is in the public interest. This assessment needs to be done immediately before any further progress is made on the WestConnex proposal project.

Unsubstantiated claims such as this are made within the EIS without adequate references:

"Public transport is best suited to serving concentrated, high volume flows of people to and from established centres. It is less suited to serving dispersed cross-city or local trips. Even with significant investment and high levels of patronage growth forecasts for Sydney's public transport network, 72 per cent of journeys in 2031 will be made on the road network each weekday by vehicle, equal to an additional 4.3 million new trips compared to current traffic movements (Infrastructure NSW, 2014)."

This statement is misleading as there is no analysis of the framework used in the source study. These questions need to be answered immediately: Did the survey or forecast factor in significant improvements in Sydney's public transport and freight infrastructure in the next 16 years? Were new work patterns such as local business hubs taken into account or the anticipated employment figures for the second airport at Badgery's Creek? And why are no independent studies sourced? Why is public transport less suited to serving cross city or local trips? This contradicts the basis of public transport networks in most other major cities in the world where public transport works efficiently and effectively.

The analysis of feasible alternatives to the project is completely inadequate with the section on public transport and rail freight improvements (Alternative 3) comprising only 5 pages (Chapter 4, pp 4.11 to 4.15) within the multi-volume EIS document. This needs to be amended immediately and before further work on the WestConnex is made.

This section does not show that public and active transport and rail freight options are not a feasible option to the New M5 road toll project. In fact, the summary statement admits that, *"Public and active transport options would be feasible alternatives to the project should the objectives of the WestConnex program of works be largely concerned with transporting people to and from centres."*

The summary statement goes on to make the claim that *"...the commuting demand is only a proportion of the demand along the M5 East Motorway corridor. The key customer markets identified for the project include highly dispersed and long distance passenger movements, as well as heavy and light freight and commercial services and businesses whose travel patterns are also highly dispersed and diverse in nature. These customers have highly varied requirements when it comes to the transfer of goods and services. These requirements include the transport of containerised freight by rigid and articulated trucks, light trucks, vans, utility vehicles and cars."*

This argument is highly flawed in that it does not suggest a significant reduction of commuter traffic on existing roads given improved public transport and active transport options and therefore the increased capacity on the existing road infrastructure would support the transport of goods and services that are not accommodated by increased rail freight services.

When specifying the 'key customer markets' as 'highly dispersed and long distance passenger movements' the EIS implies that this market requires privatised vehicle road transport with no supporting evidence to back up this claim. In fact to the contrary, long distance passenger movements are highly suited to rail transport options. The claim that movements on this corridor are 'long distance' are also questionable given that the complete WestConnex project is 33 km and many motorists will not use the entire toll road.

It further claims that heavy and light freight and commercial services have travel patterns that are 'highly dispersed and diverse in nature' and therefore require road transport infrastructure. However, claiming that travel requirements are dispersed and diverse does not necessarily preclude the development of public transport and freight systems that can accommodate such requirements - these requirements are the same for any sizable city and international best practice shows that there are sustainable solutions to these transport challenges which do not rely on privatised road transport.

References:

Institution of Occupational Safety and Health (IOSH), UK (2014) Diesel engine exhaust fumes
<https://www.iosh.co.uk/~media/NTTL%20files/POL2531%20-%20Diesel%20Fact%20Sheet%20WEB.pdf?la=en>