

SSI 6788  
NSW Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2001

28 January 2016

**Submission to WestConnex New M5 EIS;  
Application Number SSI 14\_6788**

I strongly object to the WestConnex New M5, Application Number SSI 14\_6788. As discussed below, the proposal will cause significant and unacceptable environmental impacts. The project must be rejected and should not be approved.

**Objection: Significant and unacceptable environmental and community impacts to the Alexandria and St Peters and surrounding areas from traffic related impacts. Failure to account for cumulative impact of traffic from other nearby development activities.**

Failure of the EIS and proposal to identify, assesses and incorporate population growth from significant developments within Alexandria and surrounding areas. The cumulative impact of these developments will significantly increase exacerbate traffic problems discuss below.

Specifically, examples of significant (large high rise) development either in progress, recently approved or planned for the near future include (but are not limited too):

- Ashmore Precinct, including Application Reference Number D/2015/966 currently under consideration by City of Sydney Council. Population increase about 6,000 residents
- Green Square development.
- 18 Huntley Street Alexandria. Development Application Reference Number D/2015/1718 currently under consideration by City of Sydney Council. Population increase about 600 residents
- Development of the Australian Technology Park by the NSW State Government in accordance with the *State Environmental Planning Policy (Major Development) 2005*. Application Number SSD 15\_7317; EIS currently on exhibition  
[http://majorprojects.planning.nsw.gov.au/index.pl?action=view\\_job&job\\_id=7317](http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=7317)
- Green Square development
- Sydney Metro Waterloo train station and associated development (by NSW Government).
- Central to Eveleigh rail corridor development by the NSW State

Government

- 33-49 Euston Road Alexandria
- Alice Street, Newtown
- Sydney Park Road, St Peters

The combined population growth of these nearby developments will intensify and exacerbate the impacts of this proposal on the local community. The proposal will increase the traffic volumes and alter road conditions but fails to assess and provide for development that significantly populates an area and the necessary roadway infrastructure and services to support the proposal.

In particular the Westconnex EIS and proposal fails to identify, assess and incorporated the changes to roadways proposed by these developments. For example, Ashmore Precinct development proposes to make significant changes to Mitchell Road including installing traffic lights and reducing parking availability.

The business case and EIS discuss that Westconnex proposal will cause Euston Road is to receive 61,000 vehicles per day on 3 lanes each way. This is almost 10 times what it support handle on 2 lanes. It is physically impossible for Euston Road and surrounding roadways to support this volume of traffic. Adding extra lanes to Euston will not help because the roads that Euston Road feeds are also gridlocked. Traffic does not simply dissipate once it leaves the M5. It will only increase and exacerbate the traffic related problems for this community and encourage inappropriate rat-running through roadways . The proposal relies on traffic arriving and dispersing through local roadways without adequately assessing the impact on local roadways or planning and providing for the supplementary, supporting roadway infrastructure essential to support the project.

The proposal fails to adequately plan and provide for the roadway infrastructure required to support the proposal. Euston Road is expected to receive over 60,000 vehicles per day. The proposal fails to identify, assess and provide for roadway impacts beyond the Euston Road intersection with Maddox Street. Euston Road north of Maddox Street is currently significantly congested and cannot physically support the traffic volume expected under the proposal. The proposal will lead to enoromously significant impacts on the local community as a result of traffic congestion that spreads throughout interconnected, local roadways.

Changes to local roadways within Alexandria will significantly increase traffic problems by increasing traffic volumes and making it difficult to travel along local roadways. The proposal includes:

- No right hand turn from Mitchell Road into Sydney Park Road
- No right hand turns from Euston Road into Sydney Park Road, except for buses (confirmed by Westconnex to Alexandria Residents Action Group organization).
- Northbound left turn Lane from Euston Road, Alexandria into Maddox Street Alexandria north.

Such changes will make it difficult for the large residential community to drive local streets. It will also encourage enormous significant traffic volumes to use local streets and laneways causing rat-running and impacting the local residential communities. Local roadways will become extremely congested and inefficient. Local residents will have significant trouble traveling around local roads due to significant roadways restrictions such as no right hand turns from Mitchel Road into Sydney Park Road.

The above discussed changes will significantly negative impact on the community and residential areas, especially on Huntley, Belmont and Lawrence Streets and Mitchell Road, through increased traffic volumes, traffic noise, traffic congestion and road changes to accommodate the proposal. These impacts are significant and unacceptable. they do not meet community expectation or public interest.

**Objection to northbound left turn Lane from Euston Road, Alexandria into Maddox Street Alexandria. Significant impacts incurred to the local community. This roadway is unsafe for the volume of traffic expected under the proposal.**

This will encourage traffic along Maddox Street between Euston Road and Mitchell Road. This is a small, residential roadway that cannot support the significant increase in traffic. This length of road traverses through residential areas and connects with small narrow laneways. This location is surrounded by a residential area dominated by families with young children. The City of Sydney studies of 2013 Ashmore Social Sustainability Study and the Ashmore Infrastructure Plan note that the local community is dominated by families with young children. The City of Sydney website <http://www.cityofsydney.nsw.gov.au/vision/major-developments/ashmore-precinct/planning-for-the-ashmore-precinct> states: "the Ashmore area has a higher proportion of children than others across the local area". The proposal is unacceptable to the local community and not in the public interest.

Maddox Street at this location also lacks storm water infrastructure and is frequently prone to flooding. figure 1 illustrates flooding at intersection of Maddox and Belmont Streets Alexandria after a rain event in 2015. This roadway is unsafe for the volume of traffic expected under the proposal



Figure 1: Flooding of roadway, curbs and footpaths near intersection of Belmont Street and Maddox Street during a rain event in 2015. Flooding is a frequent issue in this locality. The area lacks stormwater infrastructure to support the expect traffic volumes along Maddox Street..

Overall Maddox Street cannot support the increased traffic volume expected under the proposal. The increased traffic will impact residents through increased traffic volumes, congestion noise pollution, air pollution, reduced on-street parking and amenity impacts. The EIS fails to identify and address these impacts. Given the significance of these impacts, the proposal is unacceptable.

**Objection to widening of Euston Road north of Sydney Park Road. The unacceptable risk of safety from the proposal to the community.**

The proposal plans to widen Euston Road north of Sydney Park Road to within 2m of residential properties (specifically along the western side of Euston Road). Irrespective of whether a legal road reserve exists, it is unacceptable to widen Euston Road to within 2m of residential properties. Given the EIS predicts over 60,000 vehicles will use this road the risk to public safety of vehicles travelling so close to residential buildings is too great to allow this. The consequence of any incidents involving vehicles colliding with buildings will be catastrophic. This is not in the public interest and does not meet community expectation.



**Objection to loss of parking due to changed roadway conditions along Euston Road, Alexandria.** The changes to Euston road will decrease parking availability along Euston Road. This will increase parking competition within nearby roads such as Belmont Street, Lawrence Street. Parking availability and competition within these areas is already a significant problem. The Westconnex proposal will significantly impact local residents by increasing parking pressure and reducing parking availability. The EIS fails to identify this impact.

**Objection: significant air quality impacts.**

- I object to the use of an air quality model that has not been used in Australia before and which cannot be verified by the NSW EPA.
- I object to implementation of unfiltered ventilation stacks at St Peters. Alexandria residents are already exposed to levels of PM2.5 particles that exceed national guidelines, yet the EIS predicts that these levels will only worsen. Community expectation and public interest demand that this Westconnex Proposal **must be required to install filtered ventilation stacks**. Therefore the proposal does not meet ecologically sustainable criteria, particularly, *Inter-generational equity*. This consideration requires that the present generation ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations.

**Objection to Impacts to Sydney Park**

- I object to the loss of Space within Sydney park, particularly along Euston Road, Alexandria. This project will carve 11,000 square metres from Sydney Park and expose the rest of the park to vehicle fumes and noise. This damage is particularly felt, because this area already has one the lowest amounts of public open space per person in Australia, even without considering the future in-fill projects that are already in progress.
- I object to the loss of trees in Sydney Park, particularly along Euston Road, Alexandria
- I Object to the size of the area occupied within Sydney Park during construction. A significantly large and excess area of Sydney Park will be occupied during construction. the area is excessive and will significantly decrease the availability of the recreational, open space for the local community. The area of occupation must be significantly reduced.

**Objection to Noise impacts**

I object to the Westconnex proposal based on the following specific noise impacts:

- Noise levels 2021 and 2031, if the project is built, all along Sydney Park Road and both sides of Euston Road all properties will register the highest noise level band, i.e. >65db at both day and night ( Vol2D, App J, Appendix L – Operational noise results).

- Objection - when westconnex is operational there will be significant noise impacts to residents particularly near Euston Road and Maddox Street. There is no measurement of the impact or modelling of the impact on Euston Road, Mitchell Road, Maddox Street and surrounding roadways and residential properties. ( Vol 1B, Ch 12 Table 12-42). Given the project will encourage and increase vehicle movements along these roads (refer to above discussion) this is an unacceptable failing of the EIS. The noise impact is significant and unacceptable. It does not meet community expectation.
- 4 properties in Euston and Lawrence Streets are identified as eligible for sound mitigation. Many more in St Peters and elsewhere.( Vol2D, App J, Appendix M – Operational noise results – road traffic tables). The curious thing is that where noise levels are identified as ‘exceeding Cumulative Limit’, in some cases the property in question is eligible for assistance and in others they are not.
- Out of hours construction work for road tie-in works is predicted to cause excessive noise for 974 receivers in our broader area and sleep disturbance levels for 425 receivers. Kerbing and drainage is predicted to cause excessive noise for 1262 receivers in our broader area and sleep disturbance for 804. The figures for Alexandria specifically are 163/67 and 180/151 respectively. ( Vol 1B, Ch 12, Page 69 Table 12-34
- There is a lot of excessive noise to be endured by the residents of St Peters in particular, but also Sydney Park and Alexandria. E.G. In St Peters, rock hammering will result in an excess of 50db above benchmark, 248 receivers will exceed the norm and of those 100 will be highly noise affected. Even earthworks with no rock hammering will result in an excess over norm of 40db, 161 receivers will exceed the norm and of those 86 will be highly noise affected. ( Vol 1B, Ch 12, Page 54, Table 12-22) meanwhile, everyone will suffer excess noise from kerbing and drainage. In Alexandria, the excess above norm will be 43db, 45 receivers will be affected and 13 will be highly noise affected ( Vol 1B, Ch12, Page 55, Table 12-22)
- Overall there is a failure to comply with the *Interim Construction Noise Guideline* (State of NSW and Department of Environment and Climate Change NSW, 2009). Specifically, implementing all **reasonable and feasible measures** to reduce noise impacts. The assessment of noise on St Peters and Alexandria residents and mitigation measures area inadequate given the construction work at St Peters will be of lengthy duration and involve routine night works for a prolonged period of time.

**Objection to the design of the St Peters interchange.** The design of the above-ground roads, infrastructure footpaths and cycle ways are visually disgusting and ugly. The proposal will create a ugly eye-sore that protrudes into and impacts the visual amenity of the area. This impact significantly detracts the existing valued amenity of Sydney Park. The proposal should not be approved and the design be revised to a more visually attractive and aesthetically pleasing design that is sympathetic to site-specific location and Sydney Park values.

## **Objection to Biodiversity impacts**

I object to the removal of significant extent of critically endangered Cooks River Castlereagh Iron Bark Forest at Kingsgrove.

I object to the removal of seven hectares of habitat of one of only two surviving colonies in NSW of endangered Green and Golden Bell Frog *Litoria aurea* for a excessively large tunnelling site. I object to the ecological impact the project will have on this endangered species.

## **Objection: Significant Financial burden will result on the community.**

The costing of the WestConnex projects has blown out from an initial projected coast of \$10billion to \$16.8 billion and climbing. The business case for the project is heavily redacted so the community cannot make informed decisions regarding the project. The project will force the public to use privatised toll (fee based) roads for a time period spanning decade. This project prevents public funds supporting public transport developments. The financial burden on the community will be enormous. It is therefore unacceptable and does not meet community expectation or public interest.

The financial burden of the fee (toll) based roadway will persist for decades. Therefore the proposal does not meet ecologically sustainable criteria, particularly, *Inter-generational equity*. This consideration requires that the present generation ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations.

The new M5 is an unfair waste of taxpayers' money that could be better used elsewhere, such as on projects that improve transport infrastructure out west or in the regions, or in our area to help us cope with the massive rise in density that we are facing over the next ten years.

## **Objection: 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'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 fact that 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.

**Objection to the compulsory acquisition of homes.** The cumulative impact of numerous home acquisitions is a significant impact on the community. This is unacceptable. it does not meet the community expectation.

**Objection: The EIS Chapter 27, Cumulative Impacts fails to identify and adequately assess significant cumulative impacts for the Alexandria and St Peters localities.**

The EIS identifies Green Square development as a major development for Alexandria area but fails to identify the following:

- Ashmore Precinct, including Application Reference Number D/2015/966 currently under consideration by City of Sydney Council. Population increase about 6,000 residents.
- 18 Huntley Street Alexandria. Development Application Reference Number D/2015/1718 currently under consideration by City of Sydney Council. Population increase about 600 residents
- Development of the Australian Technology Park by the NSW State Government. Application Number SSD 15\_7317; EIS currently on exhibition [http://majorprojects.planning.nsw.gov.au/index.pl?action=view\\_job&job\\_id=7317](http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=7317)
- Sydney Metro Waterloo train station and associated development (by NSW Government).

All these developments are likely to be in progress during the construction of Westconnex. All influence to cumulative impact of Westconnex during operation. The EIS page 27-7 states it *"is likely that there would be some overlap of construction activities with the New M5"*.

The assessment of impact by the EIS is the Green Square is *"generally located away from areas affected by the project. Traffic from these developments is therefore unlikely to contribute substantially to cumulative traffic impacts in the vicinity of the project during its construction phase."*

The impact assessment is grossly inadequate, unsupported and lack understanding the local area and traffic routes. The Green Square is very close to the Westconnex footprint. Key traffic routes for vehicles included flow from Green Square to Euston Road, Gardeners Road and the Princes Highway at St Peters.

The failure of the EIS to identify the above listed development demonstrates a failure to adequately assess the cumulative impact of the project on the Alexandria Community. The overlap in construction period of Westconnex combined with Green Square, Ashmore Precinct, 18 Huntley Street Alexandria, Australian Technology Park and Waterloo Train Station will subject the local Alexandria residential community to enormous cumulative impact of multiple major development activities. The combined population growth of these developments will intensify and exacerbate the individual impacts of each individual proposal on the local community. When assessing impacts such as traffic, noise, vibration the combined total The EIS has failed to adequately assess and account for the cumulative impacts of Westconnex on the Alexandria locality. The impacts are significant and unacceptable. Therefore the proposal must be rejected.

**Conclusion:**

**The Westconnex proposal and EIS demonstrated that the proposal will cause significant and unacceptable environmental impacts. The project must be rejected and should not be approved.**

**I do not consent to my name and contact details being made available to the public. If submissions are to be made publicly available, please remove all of my personal details from this letter.**