

WESTCONNEX NEW M5 ENVIRONMENTAL IMPACT STATEMENT

SUBMISSION

by

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Preamble

The New M5 is part of WestConnex. I oppose WestConnex as a strategic planning error and waste of public money on a massive. Therefore I oppose the New M5 on the same grounds.

The government has avoided public scrutiny, abused due process, ignored best practice, and failed to justify this massive expenditure of public funds on this project. For these reasons, the Environmental Impact Statement (EIS) should be rejected.

The Minister for Planning, being a member of the government proposing the project, has a massive conflict of interest between his responsibility as Minister for Planning and being a part of the Government.

My comments on the WestConnex New M5 EIS fall under four headings:

1. Objections to process
2. Objections to WestConnex
3. Alternatives to WestConnex
4. Specific objections relating to the New M5 EIS

Each contains bolded and italicised comments or recommendations.

My submission ends with a number of Concluding Comments.

1. Objections to process

This is a huge infrastructure project with a huge investment of public funds, yet ***the NSW Government has trashed due process since the outset with WestConnex.***

1.1 It has never established a detailed business case nor published a credible cost benefit analysis for the project.

The government has often referred to the 'WestConnex Business Case Executive Summary' of September 2013 as its business case. This was not an evidence based business case, which assessed all alternative transport solution and could be subject to independent analysis. It was a public relations exercise based on assertion, without substantiation for those assertions.

Under pressure the government eventually published what it called the 'WestConnex Updated Strategic Business Case' in November 2015. That this is not a genuine business case is shown by the fact that this was produced after contracts had been signed to build the M4 Widening and the M4 East.

The 'WestConnex Updated Strategic Business Case' is another public relations exercise aimed at justifying the government's political decision to build WestConnex without objective and independent analysis to support it. The document is highly sanitised and misleading. Much crucial information on estimated toll revenue and operational costs have been redacted. An examination of the stated economic benefits of WestConnex shows these have been pumped up using dubious methodologies, to try to get a positive Benefit Cost Ratio.

Indeed, one fact that completely shreds the credibility of the 'WestConnex Updated Strategic Business Case' is its assertion of a BCR for WestConnex of between 1.71 (without wider economic benefits) and 1.88 (with wider economic benefits). This is four times the benefit to cost ratio of 0.45 for Melbourne's comparable East West Link.

How can this be? Well, with the business case released for East West Link, we know that this was cabinet in confidence advice that went to the Victorian government of the time, so it is the highest quality briefing. With the NSW government's so called business case, however, we are being told what they want us to hear. In other words it is just more PR spin wrapped as a technical document.

Tragically, if WestConnex goes ahead, by the time the so called business case has been revealed as a work of fiction:

- the state budget will be distorted by the massive capital expenditure and ongoing subsidies required to operate the road (there is no way toll revenue will meet these costs)
- more people will have been encouraged to drive rather than use public transport resulting in more air pollution and more traffic congestion
- hundreds of people will have lost their homes, bulldozed to make room for WestConnex, which includes the destruction of heritage properties
- similarly much useable parkland (eg in Sydney Park) and trees and vegetation removed
- whole areas of the inner city will be 'uglified', suburban landscapes gashed through by concrete scars and structures out of all scale and sympathy with the surrounding townscape

The EIS should be rejected on the grounds that the government has failed to produce a credible evidence based business case for the WestConnex.

1.2 The Government's its own Auditor General has serious concerns about the process being followed in developing WestConnex.

The NSW Auditor General's 2014 'Performance Audit of WestConnex' (<http://www.nsw.gov.au/news/westconnex-assurance-to-the-government>) was savage (in bureaucratic language) in its criticisms of how WestConnex has been developed. Among other things it found that the government was not complying with its own Major Projects Assurance Framework, conflicts of roles within government agencies developing WestConnex, and lack of external independent review.

The Auditor General's report noted that the Gateway Review Panel report on the preliminary business case did not receive enough information to form a view on whether it is a worthwhile and prudent investment. The Panel's traffic light risk ratings against the Gateway criteria were all yellow and red (important and urgent, and critical and urgent to address), with no green lights. The project should not have proceeded further without addressing these concerns.

The Auditor General reviewed the final business case and found deficiencies that a full Gateway review should have found. "These deficiencies related to the way the business case dealt with risks around traffic projections, project cost, economic benefits, financial analysis, governance arrangements and the procurement strategy".

It does not get much more damning than that! The project should not have proceeded further without addressing these concerns.

In spite of their serious nature, the Minister for Roads dismissed the concerns of the government's own independent Auditor General out of hand, instead of taking the Auditor General's concerns seriously. Nothing better illustrates the abuse of process by the government with regard to WestConnex. The SMH even wrote an editorial criticising the government on this ('Baird government's dismissal of report alarming', 12 January 2015).

The project should not have proceeded further until the Auditor General's concerns were addressed, and the Auditor General's requirements for Gateway reviews had been complied with. Because the government has failed to do so, the New M5 is built on sand, and we can have no confidence in it.

The staff in Planning responsible for assessing the EIS should read the Auditor General's report on WestConnex.

The EIS should be rejected on the grounds that the WestConnex has been developed contrary to the Government's own Major Projects Assurance Framework.

Similar concerns about governments' rushed and ill conceived decisions on major infrastructure projects was expressed by no less than Peter Harris, Chairman of the Productivity Commission. ('Politicians accuse of rushing on big projects', SMH, 13 September 2014)

1.3 The Government has fought tooth and nail to maintain secrecy and to avoid public scrutiny of this project

For example, in mid 2014 the Government did a deal with the Shooters and Fishers party to avoid an Upper House Inquiry, initiated by the Greens and supported by Labor, by agreeing that Ashfield Park would not be touched (a part of the Park was to have been taken for tunnel portals). ('WestConnex inquiry out as MP cuts deal on park', SMH, 26 June 2014)

Concerns about secrecy in major roads projects were expressed eloquently by the SMH's business writer, Michael West (Secrecy is the real toll road scandal', Businessday, 12 September 2012). He concludes "Even before the case for a road project is made, a 'public sector comparator' should be done by government to assess whether the money might be better spent on rail than road, and then a comparison of funding and structuring models of each". The NSW government has failed to do this.

The previous Chairman of the Productivity Commission, Bill Scales, has called for all infrastructure projects above the value of \$1bn to subject to a cost benefit analysis, and this be published before the project proceeds ('Cost-benefit analysis urged for all projects of over \$1bn', SMH, 6 August 2014). The NSW government has manifestly failed to follow this suggestion for good practice with WestConnex.

Now it seems the government's replacement of the WestConnex Delivery Authority with creation of the Sydney Motorway Corporation is another way to avoid public scrutiny ('WestConnex buried from public scrutiny', SMH, 17-18 October 2015).

The latest examples of the government's attempts to avoid public scrutiny are

- firstly, the cynical release of the 'WestConnex Updated Strategic Business Case' on Friday 20 November 2015, the day after the NSW Parliament rose for its summer recess, and
- secondly the Minister for Planning only allowing a minimal 55 days over the summer holiday period for public comment on the immensely technical and complex New M5 EIS

The New M5 EIS should be denied planning approval on the basis that the government has not allowed sufficient opportunity for public scrutiny and debate on the New M5 and WestConnex more generally

1.4 The Government has just gone through the motions of community consultation. It is not interested in community views, and is intent on bulldozing through its road come what may.

At the public meeting at the Enmore Theatre on 23 February 2015, there were prolonged loud and angry protests, questions and heckling from the floor. This opposition to WestConnex was just airbrushed from the records, to make it seem that that a calm consultation had taken place.

The WestConnex Delivery Authority (WDA) however learnt from this experience. It held subsequent meetings inside licensed clubs (see 1.5), where protesters could be kept out or thrown out (which did happen).

1.5 The WDA information sessions were a complete waste of time, and just a means to say they have consulted or informed the public.

Another meaningless public relations exercise. My experience is in relation to the M4 East, but from what I hear it has been the same with the New M5.

For example, I attended the information session at Wests in Ashfield. I had a number of questions that those present could not answer, so these were dutifully taken down by scribes with a promise they'd get back to me. They never did.

The WDA information service developed a technique of responding to my specific emailed questions by inviting me to discuss them over the phone rather than provide me with a written response. I can only interpret this as a reluctance to put their responses in writing on the public record.

The stuff in the EIS about community consultation is nonsense. Inadequate community consultation is a ground for refusing planning approval.

1.6 The EIS is not the appropriate opportunity to comment on WestConnex.

In lieu of a meaningful opportunity to comment on the concept of WestConnex, the WDA and WestConnex contractors deflected questions and avoided giving information by saying it will all be in the EIS. Commenting on the EIS is not the same as commenting on WestConnex, especially as the Government has corrupted the planning process, for example by signing a contract for the construction of the M4 East before having received planning permission.

1.7 There has been an inadequate time given to comment on the EIS.

The EIS is massive and highly technical. It is hard for individuals to find time in busy lives to absorb the document and make meaningful comment. For organisations such as community groups and local Councils, they have also to go through a process of agreeing the organisation's positions on a whole number of things included in the EIS before they can respond.

The statutory minimum of 30 days is ridiculous and held up by the Government as the benchmark, and we that should be grateful for any increase on that.

The Minister for Planning's initial 45 days for the M4 East was derisory for this project and indicates to me pressure to approve the project with minimal scrutiny now the contract has been signed.

Intense lobbying of the Minister resulted in the 45 days being increased to 55 days, but this is not really adequate. When I worked in Wales the statutory minimum for public consultation on policy was 90 days, and WestConnex is public policy on a massive scale. The period should be 90 days, especially for a project of this magnitude. Instead, the Minister for Planning has now repeated the 55 days public consultation period for the New M5, but this time over the summer holidays, when many people are away.

The public consultation period for each WestConnex EIS should be 90 days, especially for a project of this magnitude.

1.8 The government signed a contract to construct the M4 East before receiving planning approval though the EIS process.

This exemplifies the absolute mockery of approval process. What Minister for Planning is going to refuse permission or substantially change the proposal in such a circumstance?

Conclusion: This project has no credibility. The Government has failed to present and argue its case for WestConnex, and has indeed done its best to avoid public or parliamentary scrutiny of the project. The whole process has been disturbingly antidemocratic.

2. Objections to WestConnex

2.1 WestConnex is poor strategic policy

Australia is almost totally dependent on imported oil. This comes to us from unstable parts of the world over vulnerable sea lanes. If that supply is interrupted then economic activity in Australia will rapidly grind to a halt. Especially as the Australian government does not have the strategic wit to stockpile oil, say three months' supply, as other countries have done.

People point to electric cars, but these just move the source of energy generation. And at the moment most electricity in Australia is generated using coal, contributing to global warming. There will be increased international pressure on Australia to reduce the use of coal.

We have to reduce our oil dependence, and burning of fossil fuels, by reducing energy consumption and using alternative energy sources. In terms of transport this means reducing car dependence and favouring more efficient public and active transport solutions over energy intensive private cars.

WestConnex encourages car dependence and the use of fossil fuels

2.2 WestConnex is an outdated concept and poor planning policy

Far from ex PM Abbott's ideological commitment to the primacy of the car over public transport and ambition to build the roads of the 21st C, WestConnex is a mid 20th C concept.

I recently saw a comment favourable to WestConnex saying that this is fulfilment of a plan made 60 years ago. Precisely. 60 years ago was in the age of cheap and abundant oil, of rising affluence at the start of the post war boom. Sydney was a low density city of 1.5m people, and people aspired to the quarter acre block in the suburbs. None of this now pertains. No one had heard of greenhouse gas emissions and global warming. Since then, we've had 'oil shocks' and increased prices. We are probably past 'peak oil', a concept not dreamed of 60 years ago. And Sydney is now a city of 4m people rapidly growing towards 6m, with increasing population density and people increasingly living in multi unit dwellings.

Increasing population density and relying on private road transport is fundamentally at odds with each other. One can never build enough roads, which become congested as soon as they are built.

The solution for a city the size of Sydney is increasing density coupled with mass transit systems and active transport solutions.

This is now recognised the world over, with sophisticated cities, not only in Europe, but in the US and Asia, building mass transit systems. Consultancy companies, McKinsey and SGS Economics and Planning, have pointed out how Sydney is falling behind other cities in Asia and elsewhere, and how this impacts on our economy and claims to be a 'global city' ('Public transport still the key to the future', SMH, 14-15 June 2014). The latter point is explored by SMH economics writer Matt Wade, who concludes that effective mass transit is required for the 21st C knowledge economy ('Smart cities need good transport to lure wise workers', SMH, 23 April 2014). A point he had also made in a previous article ('Infrastructure woes drag down Sydney's ambition to be a global city', SMH, 13 April 2014).

Good public transport systems and active transport solutions such as bicycle paths encourage people who have the option to use these over using the private car, freeing up road space for trucks and tradies who have to drive as part of their daily business.

That WestConnex is not based on rational strategic transport planning is explained in Lyall Kennedy's excellent paper surveying the historical context for WestConnex (<http://m4eis.org/2015/10/29/narrow-interests-plus-public-transport-failure-behindwestconnex-m4-east-lyall-kennedy-submission-part-2/>). Kennedy points out that the Long Term Transport Master Plan did not originally include WestConnex; it was amended later to retrofit WestConnex as a centrepiece, arguably distorting transport investment in Sydney.

The M4 East is a revival of the 2003-04 plan to extend the M4 to the CBD. The earlier scheme did not proceed due to concerns over economic viability and environmental impacts. The latest iteration, in the EIS, is no better in these regards, so should be similarly abandoned.

2.3 WestConnex is a low priority for Infrastructure Australia

The WestConnex EIS under consideration has come about because of the Abbott Government sidelining Infrastructure Australia, the technocratic body that should be making evidence based decisions on infrastructure projects. WestConnex was way down their list of priorities.

WestConnex should be referred to Infrastructure Australia before it proceeds further, for objective assessment and prioritisation against other infrastructure projects, free of political interference.

2.4 WestConnex is not economically viable

Capital costs:

The 'WestConnex Business Case Executive Summary' of September 2013 gave a benefit cost ratio of 2.55 (p20). This was a total fiction.

Firstly, costs have increased. The Executive Summary estimates the total cost of WestConnex to be less than \$11bn (p21). The latest estimate is \$16.8bn, an increase of two thirds in two years. And this cost is bound to increase significantly, as it always does with major infrastructure projects.

Secondly, the stated economic benefits in the Executive Summary were extremely flaky. These were stated as over \$25bn on p21, of which over \$15bn are 'travel time savings'. This commonly simplified to "benefits of more than \$20bn", a conveniently round and easily memorable figure that the media has obligingly repeatedly regurgitated as fact. I doubt this figure for a number of reasons:

- the Government has never provided substantiation for these figures
- some of the stated benefits seem to be duplicative and definitely vague. What for example does 'Environmental and indirect benefits and residual value' mean?
- what does 'time travel savings' mean? The figure is likely to be calculated on savings of a few minutes on millions of journeys of work. This is private time, of people being able to leave a home a little later and arriving home a little earlier. I do not consider this to be an economic benefit; it is just a way of inflating the figures. The real economic benefits are the productivity benefits, which are stated as less than \$3.5bn

If one takes out the unsubstantiated and dubious 'Time travel savings', the benefit-cost ratio becomes less than one.

Infrastructure Australia's assessment of WestConnex earlier in 2015 shows a significant fall from the 2.55 benefit-cost ratio of September 2013 to 1.8. Infrastructure Australia however pointed to serious flaws in the WDA methodology, which will reduce the figure further ('Thumbs up for WestConnex', SMH, 28 February 2015).

Now we have the 'WestConnex Updated Strategic Business Case' with its assertion of a BCR for WestConnex of between 1.71 (without wider economic benefits) and 1.88 (with wider economic benefits). This is four times the benefit to cost ratio of 0.45 for Melbourne's comparable East West Link.

How can this be? Well, with the business case released for East West Link, we know that it is the cabinet in confidence figure that went to Cabinet in Victoria, so likely to be the most balanced and objective figure.

In comparison, the 1.8 benefit-cost ratio figure is quoted on p3-10 of Volume 1-A of the New M5 EIS, but without any explanation of how this figure is arrived at. It is highly likely that this figure has been manipulated to be on the high side, and therefore subject to the criticisms I have made above. And as point out in 2.8 below, no one can be sure on the traffic projections, and experience with other motorway projects in Australia time and again is that these turn out to be very optimistic, to justify the proponents' proposal.

At the end of the day the benefit-cost ratio for WestConnex is likely to be close to the 0.45 that was revealed by the change in government in Victoria to be the case for the comparable East West Link project in Melbourne.

WestConnex is a poor investment, with a benefit-cost ratio is likely to be significantly less than 1.0.

Recurrent costs:

A budget has never been produced to shows that the tolls collected will be sufficient to run the motorway, and produce a surplus sufficient to fund Stage 3. The ongoing costs are significant:

- the cost of electricity to power lights, signs, ventilation fans, water pumps
- staff for monitoring and motorway and traffic management
- road and tunnel maintenance
- the imputed cost of capital ie how much the government could earn by investing the amount spent on building WestConnex

The government is in a dilemma. The higher it puts tolls to cover running costs and generate a surplus to fund Stage 3, the more drivers will avoid WestConnex and use other routes to avoid the tolls. Which rather defeats the purpose of WestConnex to take traffic off the surface. Or it can reduce tolls to encourage people to use WestConnex, but run the risk of reducing revenue.

It is doubtful that toll revenue will be sufficient to fund Stage 3.

2.5 Stage 3 is unfunded

The Commonwealth and State government's have only put in enough money to fund Stages 1 and 2 (the latter by means of a loan from Commonwealth to State). Stage 3 is currently unfunded. There is over a \$10bn shortfall in funding to complete WestConnex.

The whole argument for WestConnex depends on completing the whole motorway, that is including Stage 3. Not to do so, will mean that billions of dollars of taxpayers' money will have been spent moving traffic jams a few km, at enormous social and environmental cost to suburbs such as Concord, Ashfield, Haberfield and St Peters. This includes loss of peoples' homes with inadequate financial compensation, destruction of heritage buildings, destruction of businesses, immense scarring of the suburban landscape, and increased air and noise pollution. For what purpose?

It is reckless in the extreme for the government to embark on building individual stages of WestConnex without assured finance to complete the whole project. The project should be put on hold until it can demonstrate it has the funds to complete it.

2.6 WestConnex will distort and undermine state finances

Michael West, business writer for the SMH has reported on an analysis done on behalf of Fairfax Media by actuary, Ian Bell, on the comparative costs of urban motorways ('Light shed on the cloudy costs of roads', 11 August 2014). One of Bell's conclusions was that, unsurprisingly, the capital costs for roads jump significantly once tunnelling is involved. He found that WestConnex was two and a half to three times as expensive to build as the M7. As the government could not set tolls on WestConnex two and a half to three times the level of the M7, as no one would use WestConnex, the latter will require hundreds of millions of dollars of funding to meet revenue shortfall. This shortfall will have to be picked up by the NSW budget.

It is highly likely that the state (possibly with Commonwealth assistance) will have to fund the completion of project and provide ongoing subsidy for its operation. In addition WestConnex will induce more traffic and therefore induce more funding for the widening of roads feeding and taking traffic from the tunnels.

So far, the private sector has steered well clear of WestConnex, having previously had its fingers burnt with projects such as the Lane Cove and Cross City tunnels. WestConnex is therefore not funded using a public private partnership (PPP). Taxpayers are taking the entire risk, with private capital sitting back and seeing what happens. If they think they can turn a buck by renting or buying sections of WestConnex they will do so. Otherwise taxpayers will be left carrying the can.

The NSW Greens Commissioned a financial analysis which showed that even allowing for estimated toll revenue, depreciation and operating costs means that WestConnex will make an annual loss \$29m, and the project will carry an interest burden of \$630m pa on that loss ('WestConnex will be a disaster: Greens', AFR, 27 November 2014).

It is likely therefore that taxpayers will have to subsidise WestConnex for over half a billion dollars per annum into the foreseeable future.

Another option is that the government will be so desperate to fund Stage 3 and to get operating costs off its books, that it will sell the rights to earlier stages to a private motorway operator at a reduced price. That is for less than the publicly funded capital cost of building the road. This still means that the government and taxpayers will have paid a massive subsidy to build this one road.

Stephen Greaves, associate professor in transport management at Sydney University, has pointed to the cost of WestConnex crowding out funding for other infrastructure including public transport ('WestConnex may gobble up rail money, says expert', SMH, 12 June 2014).

This is all supported by the writings of Ken Davidson, respected Victorian economics writer on Melbourne's own version of WestConnex, the East West Link and its previous iterations ('Why the east-west road tunnel is a stinker' The Age, 28 November 2011; 'Why tunnel vision will cost all Victorians, big time', The Age 24 June 2013; 'East West funding part of a bumpy road for the future', 7 May 2014 – all of these are available on line). The history of the East West Link sounds depressingly similar to that of WestConnex, the secrecy, the lack of a business case, cost benefit analysis etc.

The major point however is that, as it will be for NSW with WestConnex, that "The East West Link will be a financial and environmental disaster" and "It will cripple the state's fiscal position for many years". Victorians had a narrow escape from a huge financial burden with the change in government and cancelling East West Link. Would that we in NSW were so lucky.

The cost of WestConnex is so huge that the public funding required will be a drain and distort the state budget for years to come, precluding funding on other services, including public transport.

2.7 EISs for individual stage are not valid

The arguments that the government mounts on the benefits of WestConnex depends on the completion of all three stages, 1, 2 and 3. How then can one conduct an EIS on an individual stage? Either the benefit-cost ratio is calculated on that individual stage such as the New M5, or an EIS conducted for the WestConnex as a whole.

The EIS should be for the whole of WestConnex, not for individual stages, such as the New M5.

2.8 WestConnex is based on dubious traffic projections

The whole WestConnex proposal, its economics, its benefits and its costs, hinge on credible traffic projections. Traffic projections are the basis for:

- the road's benefit-cost ratio
- the economics of the road through toll revenue
- projecting the impact on Parramatta Road and other surface roads
- projecting air and noise pollution, and therefore the road's health impacts

The government has employed AECOM to do the traffic projections for the New M5. This is the same company that had to pay massive compensation for its traffic projections in Australia.

In September 2015 banks which had financed Brisbane's failed Clem7 RiverCity tunnel, successfully sued AECOM for its inaccurate traffic projections, settling for \$280m (the banks had alleged that AECOM's work had cost them \$1.5bn. In addition, 650 investors are pursuing a class action against AECOM on the same matter. Incredibly, it is alleged that AECOM had failed to reveal earlier forecasts it had developed for Brisbane City Council that showed travel volumes significantly lower than those in the RiverCity Disclosure Statements.

The experience with Brisbane's RiverCity tunnel must throw doubt on the accuracy of AECOM's traffic projections for the M4 East.

But failures of traffic modelling are more endemic than those of AECOM in Brisbane. A brilliant paper by Anthony McCosker, together with references to the literature, at <http://m4eis.org/2015/10/17major-flaws-in-westconnex-eis-traffic-report/> shows that **traffic modelling is not to be relied on and should not be used as a justification for road projects**. In summary, "In attempting to model the future, traffic modelling makes a number of assumptions to produce what can sometimes seem like absolute and certain figures. In contrast, the number of assumptions, simplifications and estimations in the modelling means that the figures produced are just one possible outcome of many."

McCosker gives three examples that warn against traffic projections justifying road projects:

- the Clem 7 example, where AECOM predicted over 100,000 cars a day usage by 2011, despite predicting just 18 months previously, 57,000 cars per day. Actual traffic usage in 2011 was less than 24,000 cars per day
- the Cross Sydney Tunnel became insolvent in 2006 due to traffic modelling predicting 90,000 cars per day, compared to actual usage of 20,000 cars per day
- the two companies responsible for the Lane Cove Tunnel are being sued after the tunnel becoming bankrupt soon after completion in 2009 due to actual usage less than half that predicted

There is also history in Australia of consultants justifying traffic projections that the government and private sector want to hear. This is easily achieved by changing the assumptions in the model.

A recent episode of the ABC TV's 'Utopia' program is prescient on how governments will manipulate the assumptions behind the data to get the result it wants for road projects.

The SMH reported on 12 and 13 August 2014 ('How traffic numbers went into a dark tunnel' and 'Audit chief Shepherd 'pumped up' traffic figures', respectively) the real life example of traffic forecasts for the Lane Cove Tunnel, now subject to litigation.

The New M5 traffic projections cannot be relied upon, and this goes to the heart of the economic justification for WestConnex and its financial viability.

Traffic projections are so fundamental to WestConnex and its EIS that to try to get as accurate projections as possible, the NSW Department of Planning and Environment should request two further independent assessments of traffic numbers be conducted before the EIS is assessed, and publish the assumptions on which they are based.

2.9 WestConnex will not reduce traffic congestion

The common misperception is that by spreading existing traffic over a bigger road surface will reduce traffic density and therefore congestion. Wrong.

The phenomenon of induced traffic will mean that the additional road capacity created by WestConnex will soon fill, as people are encouraged to use their cars over other transport modes. After a short period, congestion will return to its present level or worse.

An excellent brief explanation of 'induced traffic' (and 'peak car use', reached in Australia in 2004), together with references to the literature, is at <http://m4eis.org/2015/09/30/noteexplaining-auomobile-dependenc-peak-car-use-and-induced-traffic/>. I recommend those in Planning assessing the EIS read it, as it really destroys the whole justification for WestConnex.

The only way to reduce traffic congestion is to encourage people who can, to use other transport modes by making these relatively quicker than road transport.

The current experience of the closure of George Street in the CBD is instructive. There, traffic congestion has not got worse, and may even have got better, as people adjust their travel behaviour.

Now is the time, before the massive investment in WestConnex, is to break the paradigm of just building more roads in an endless quest to reduce traffic congestion, and instead invest this money in an expansion of public transport provision.

2.10 WestConnex is not an integrated transport proposal

The M4 East is a good example of this. There, in spite of government rhetoric to 'sell' the road, and pretty lines on maps with vague promises to look at light rail along Parramatta Road, it has made no commitment to improved public transport as part of WestConnex. It is just a very expensive road.

The nearest thing to a commitment to improved public transport along Parramatta Road, is a dedicated bus lane and faster buses. Big deal; painting a road lane red. In the context of Australia's biggest road project?

WestConnex should include a funding commitment for improved public transport as part of the integrated transport proposal it purports to be. The New M5 EIS should not be approved until it includes funding allocated for specified improvements to public transport along its route.

2.11 WestConnex will not take traffic off surface roads

The detailed design of WestConnex now emerging shows that the government's selling line that traffic will be magically taken off the ground and whisked through the fibre optic cable that is WestConnex (watch the early promotional videos) is a myth. It might take traffic off some surface roads where the tunnel duplicates them, but entrance and exit portals will increase surface traffic in their vicinity, where vehicles are exiting and entering tunnels.

2.12 Who pays for and who benefits from WestConnex?

In response to people losing their homes to WestConnex Premier Baird said that a few people have to make sacrifices for the benefit of many.

So, who is paying for and who is benefiting from WestConnex?

People losing their homes is at the extreme end of sacrifice, which is made worse by inadequate compensation to enable them to buy back into the same area. At a personal level this means people uprooted from their communities and social networks, including children having to change schools and losing their friends. At a policy level it means the loss of housing stock in accessible locations, mostly houses for families which are not being replaced. And there are hundreds of homes being lost and blighted, wherever WestConnex stretches its tentacles. We now know about the M4 East and New M5 areas. And Stage 3 will inevitably result in more homes being lost along its route.

But we are all paying financially for the folly of WestConnex through our taxes

Also through tolls paid by users. And WestConnex is not only to be paid for by its own tolls, but also by raising tolls on other roads ('Disappointed NRMA hits out at toll 'cross-subsidy' proposal, SMH, 8 April 2014). Tolls have already been reimposed on the M4. A leaked financing strategy by Macquarie Capital revealed the extent of imposing new tolls on the M5 ('Revealed: M5 tolls to stay 50 years', SMH, 7 April 2014). Road users throughout Sydney will be paying for this one road.

We are also paying through not receiving other services, including public transport, that \$16.8bn being spent on WestConnex would otherwise purchase.

The people of Western Sydney have been completely misled on the benefits to them of WestConnex. How many really want to drive to the CBD or to the airport? The fact is that 90% of trips to the CBD are by public transport, and parking in the CBD is limited and very expensive. As for driving to the airport, it will still be quicker, and cheaper, to catch a train from Parramatta than to drive, even after WestConnex is built.

Instead, what the people of Western Sydney need is better transport access within Western Sydney, which is the major location of growth within Sydney.

So, who is benefiting?

The Minister for Roads benefits due a substantial increase in the size of his portfolio. And the roads bureaucracy benefits from the continuing stream of work that WestConnex and the inevitable downstream road projects it will engender.

The trucking industry? The improved movement of freight to and from Port Botany is often given as a benefit of WestConnex. But WestConnex does not go near and is not connected to Port Botany, and it surely would if this were its major purpose.

Improved access by car to Sydney Airport is often given as a rationale for WestConnex, and this is the truth of the matter. The privately owned Sydney Airport collects a lot of revenue from parking, and has lobbied for years for improved road access. But this is scarcely an argument for the expenditure of large amounts of public funds on WestConnex, with the Airport already having good rail access.

The corporations building WestConnex, and the numerous consultants involved in designing and justifying it, and the eventual private operator of the tollway will benefit from WestConnex. So will the banks and financial institutions if it attracts private capital.

Michael West, with another of his succinct and incisive analyses has explained how professionals get rich on the fees from road projects, and that fees for roads are far more lucrative than rail ('Bankers and lawyers get rich pushing roads', SMH, 2-3 August 2014). As he says "the real winners from the road deals are bankers, lawyers, accountants and assorted professionals who so indispensably provide their advice". West refers to them as "the road pushers".

In summary then, the government's friends in the big end of town are the major beneficiaries, set to make a motza out of public purse in designing, building and operating WestConnex, with all the risk lying with taxpayers.

Quite the reverse of the Premier's assertion, then, the many are paying for the benefit of the few.

3. Alternatives to WestConnex

I have been following the press on WestConnex for a long time. Apart from people who benefit from or are fearful of criticising the government lest they lose business, and the politically partisan Murdoch press, what I have found is universal criticism and condemnation by transport experts and commentators. I have mentioned a number of examples throughout this submission. Consistent is that the future of cities like Sydney lies with public transport, not more roads.

A typical recent example is 'We need to build the cities of the 21st century, not the roads ...' by Professor Peter Newman, AO, John Curtin Distinguished Professor of Sustainability at Curtin University (p7, EcoTransit News, October 2015). Prof Newman was also on the Board of Infrastructure Australia for four years. He argues that WestConnex should be stopped and that the \$15bn (now \$16.8bn and rising) that was to be spent on be redirected into improving public transport for, and walkability of Sydney.

The government, however, has never systematically considered alternatives to building WestConnex. Or at least as far as we know. All we have is some vague analysis that concludes that WestConnex is the best or only option, an example of retrofitting the arguments to suit the government's preconceived ideas.

Led by Tony Abbot, and his 1950s love affair with the car and disdain for public transport, the NSW Government had decided it wants to build WestConnex, Australia's most expensive road, which will suck in funds that could be used for other infrastructure.

Comparatively little public funds have been put into WestConnex so far, and the project should be referred to the Productivity Commission for review before proceeding further.

4. Specific objections relating to the New M5 EIS

4.1 Visual blight

It is a myth that the government has promoted that WestConnex removes traffic from the surface and puts it underground. It does this for those sections of the road which are underground, but inevitably where WestConnex comes to the surface it wreaks greater environmental havoc than the existing situation. So it is with the New M5.

I am horrified at the visual impact of the New M5 on the southern inner and middle ring suburbs of Sydney.

At the southern end (Beverley Hills), the joining of the two M5s results in a road that is 10 or more lanes wide. Both the resulting plans and cross sections of this give an idea of this blight that is proposed to be visited on the area. This road will be a great scar on the urban landscape, rip communities apart, and subject them to greatly increased noise and air pollution.

At the northern end (St Peters) we are confronted with a huge 'spaghetti junction' of roads on three levels. This is an even greater visual blight than the southern end as the roads are elevated.

These sort of roads might be suitable for the low density urban fringes, but not for densely populated inner areas. The New M5 will be a permanent visual blight on inner Sydney. Any amount of tree planting and other prettying up will be completely inadequate to mitigate the disaster for the urban environment that is the New M5, and WestConnex more generally.

Sydney must be one of the few places in the developed world that is still doing this sort of thing; other cities are pulling down such monstrosities and building mass transit systems to take people off the roads. WestConnex really shows what a backward nation we are.

I object to the visual blight that the New M5 will inflict on Sydney and suggest that this is a ground for refusal of the New M5 as presented in the EIS.

4.2 Expansion of surface road systems

Contrary to the government's assertion that WestConnex will take traffic off surface roads, the New M5 EIS admits that the tolls imposed will result on traffic diverting off the motorways network onto local roads (this was also admitted in the M4 Widening EIS, and has been seen with past tollway projects, such as the Cross City Tunnel).

And the long list of related widenings and 'improvements' to existing surface roads in St Peters and adjoining suburbs, summarised on p i of the Executive Summary and expanded on elsewhere in the EIS (eg in section 5.7) are clearly needed because the New M5 will result in an increase in traffic in this area.

Inevitably these 'improvements' will shift congestion to different points, which will then lead to demand for more 'improvements'; and further takeover of the suburban fabric more roads. And so it goes on, with the steady destruction of homes and parkland.

I object to the New M5's detrimental effect on local roads and the suburban environment in St Peters and surrounding areas.

4.3 Use of Sydney Park

If it had not been reported in The Sydney Morning Herald I would not have been aware that the Sydney Motorway Corporation is planning to use part of Sydney Park as construction compound. In spite of the significance of the alienation of important inner city public land, this is buried deep within the EIS on p 6-4 and figure 6-4 of Volume 1A. This is disingenuous and typical of the government's secrecy about WestConnex.

My objections to this proposal are

- WestConnex has a huge area of the landfill site to use as a construction site, and the whole basis of the EIS is that by using this site, it will have minimal impact on properties and open space.
- If the easy option of Sydney Park were not available, this landfill site would be sufficient for construction activities
- The use of this site is said to be temporary (p6-33). Frankly I do not believe this. Once the Roads bureaucracy get possession of the land they quietly find a use for it, in the hope that a few years down the track people will have forgotten it is public parkland.
- The government has repeatedly said that the only part of Sydney Park that would be used would that already designated as road reservations. Clearly the government is not to be trusted to keep its word.

If planning approval is given to the New M5, a condition should be that no part of Sydney Park which are not currently road reservations are to be used, temporarily or permanently, for the construction of the New M5 and ancillary works.

Concluding Comments

I oppose WestConnex, full stop. The resources put into WestConnex, and conceptual thinking underpinning it, will set back transport planning and urban planning more generally in Sydney for a decade.

WestConnex is not the magic fix to Sydney's traffic congestion. Instead, the induced traffic it will create and spreading of traffic congestion onto surface roads already at capacity will create demands for an unending demand for road 'improvements'.

The M4 Widening is comparatively simple and cheap, and could even be reversed. But the M4 East and New M5 are the tipping points. If they are built, there is no going back. We will be propelled towards completing WestConnex. And then an ongoing stream of expensive road projects into the future, such as the northern extension/Harbour crossing, southern extension, and Sydney Gateway. Plus a plethora of expansions of the surface road network to address the congestion problems WestConnex will create.

It is time to change the paradigm and stop this madness.

I believe I have presented enough arguments in this submission for planning approval based on the EIS to be refused.

***I request an individual written response to all points I have made in my submission.
Thank you.***

John Hyde
29 January 2016