[redacted]

From: [redacted]
Sent: Monday, 11 January 2016 8:01 PM
To: DPE CSE Information Planning Mailbox
Subject: Submission to SSI 14_6788 WestConnex New M5

Attn: Secretary, Department of Planning and Environment

I make this submission in response to the WestConnex New M5 Environmental Impact Statement (EIS), project number SSI 14_6788. I object to the project and the whole WestConnex for a range of reasons, which I have listed below.

I expect to receive a response to all of my concerns.

TRAFFIC IMPACTS

I object to the impact on traffic the New M5 will bring to my local suburbs. When complete, the New M5 will cause an extra 50,000 cars per day into our suburbs. The proponent estimates our key local roads, such as King Georges, Stoney Creek, Canterbury, Forest, and Moorefields will need to absorb this additional traffic due to motorists avoiding the tolls.

I object to the public announcements that King Georges Road will have a 49% improvement in travel time, yet the EIS acknowledges that the current LoS-F (Level of Service) will be the same with our without WestConnex.

The EIS ignores the published work of independent traffic and planning experts who have presented evidence based arguments that the Westconnex will not meet its goals. It should be rejected on that basis alone.

I object to the decision by AECOM to do no serious traffic modelling outside the project area; it is absurd to suggest that the impacts will stop at the end of the project. Instead communities will be left to deal with traffic and unhealthy pollution and the additional financial and social costs that will result from WestConnex.

I object to the failure of the Sydney Motorway Corporation to publicly reveal the peer review of the traffic model and their failure to reveal the assumptions on which it is based so independent traffic planners can test its results.

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I object to the superficial consideration of alternatives which consists of little more than bald claims rather than presenting analysis of alternatives including public transport and traffic management that could reduce road freight and car use.

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I object to hundreds of trucks a day for years transporting millions of cubic metres of soil including contaminated waste (asbestos) through Kingsgrove and Moorefields Road to the Western suburbs where it will be dumped without any clear plans or information for communities affected.

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The RMS was given approval to build the old M5 on condition that it protected endangered flora and fauna. Now it wants approval to destroy those communities for a new tollway because its old project has failed to solve congestion. This makes the system of conditions meaningless. This proposal should be rejected.

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I object to the removal of 7 hectares of habitat of one of only two surviving colonies in NSW of endangered Green and Golden Bell Frogs for a massive tunnelling site.

TUNNELLING IMPACTS

I object to the selection of tunnelling methods that may damage houses at the surface.

AIR QUALITY

I object to a transport 'solution' that results in a further nine unfiltered exhaust stacks throughout highly populated suburbs.

It is unacceptable that a 35 metre exhaust stack is located in the valley of Kingsgrove, with schools, homes and sporting fields on higher ground.

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I particularly object to tollway portals and increased traffic being so close to local schools. I note that fine particle pollution can cause lung cancer and is particularly dangerous for the lungs of growing children. I support the parents of local schools who have requested an extended period of time after school returns at the end of Janaury 2016 in which to seek independent advice.

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I particularly object to the transparent noise walls, as an "opportunity to enhance the driver experience with views across Canterbury Golf Course, Beverly Grove Park and Tallawalla St park". This demonstrates that urban repair for residents' is not a priority.

GREENHOUSE GAS EMISSIONS

The whole WestConnex system will increase greenhouse gas emissions in Sydney at a time when we should be doing all we can to reduce them. I am not convinced by a method of analysis which does not look at alternatives but instead compares the New M5 project against a 'do nothing' scenario to claim a reduction in greenhouse gas emissions.

In addition, no credible authority in the world today would suggest that building huge urban motorways is the solution to cutting national greenhouse emissions, or that increases in vehicle kilometres travelled (VKT) would somehow result in a net reduction in greenhouse gas emissions. Yet this is exactly what the proponent is claiming in this EIS. I object to this flawed analysis.

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I object to a planning system that awards billion-dollar contracts to tollway construction company when local government staff and many experts are convinced the WestConnex will not deliver on its objectives. This places unreasonable pressure on planners to approve the project.

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Whole communities will be disastrously impacted by this project. The social impact study - which is even less detailed than the inadequate one done for the WestConnex M4 East EIS - should be rejected, as it ignores well established evidence of the significant negative impacts on people of loss of community identity and social connections. The study is little more than a cut and paste and is insulting to residents, both those who are being forced to sell and those who will stay.

NOISE

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COMPENSATION FOR LOSS OF HOMES

People's homes are being forcibly taken from them so the government can build a road that does not make sense and a road that I will never use. The compensation for this heartbreaking loss is abysmal. It should be at least 50% more than the suburb record not 30% less. These people have to fund furniture removal, new homes, all the little things that one must do when one moves, take time off work, uproot themselves and likely from the community find their children to new schools.

I recognise there is pressure on several NSW Departments, including Planning and the Environment, to approve this project. I remind public servants of their obligation to the public and to the potential social, health and economic costs of spending $16.8 billion on WestConnex when it provides no solution to Sydney's transport needs.

Yours sincerely,

[redacted]

[redacted]

[redacted]

[redacted]

From: Josie Smith [redacted]
Sent: Sunday, 10 January 2016 3:46 PM
To: DPE CSE Information Planning Mailbox
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Yours sincerely,

Josie Smith

Sydney NSW 2015, Australia



[redacted]

From: Yann Quide[redacted]
Sent: Sunday, 10 January 2016 1:52 PM
To: DPE CSE Information Planning Mailbox
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Yours sincerely,

Yann Quide

Sydney NSW 2042, Australia



[redacted]

From: Ben Morris <[redacted]
Sent: Sunday, 10 January 2016 12:57 AM
To: DPE CSE Information Planning Mailbox
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[redacted]

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I object to a consultation period being held during January when schools are closed, residents are away and many local government staff are on holidays. The consultation period should be extended until March 2016.

SOCIAL IMPACT STUDY

Whole communities will be disastrously impacted by this project. The social impact study - which is even less detailed than the inadequate one done for the WestConnex M4 East EIS - should be rejected, as it ignores well established evidence of the significant negative impacts on people of loss of community identity and social connections. The study is little more than a cut and paste and is insulting to residents, both those who are being forced to sell and those who will stay.

NOISE

Many residents will experience noise during construction and operation at unsafe levels that can damage health. I object to the lack of information about mitigation and the suggestion that those above a second story may not be mitigated at all.

I recognise there is pressure on several NSW Departments, including Planning and the Environment, to approve this project. I remind public servants of their obligation to the public and to the potential social, health and economic costs of spending $16.8 billion on WestConnex when it provides no solution to Sydney's transport needs.

Yours sincerely,

Dylan Higgs

Sydney NSW 2138, Australia

_____

[redacted]

[redacted]

From: Cyprus Tutunoa <[redacted]
Sent: Saturday, 9 January 2016 11:54 PM
To: DPE CSE Information Planning Mailbox
Subject: Submission to SSI 14_6788 WestConnex New M5

Attn: Secretary, Department of Planning and Environment

I make this submission in response to the WestConnex New M5 Environmental Impact Statement (EIS), project number SSI 14_6788. I object to the project and the whole WestConnex for a range of reasons, which I have listed below.

I expect to receive a response to all of my concerns.

TRAFFIC IMPACTS

I object to the impact on traffic the New M5 will bring to my local suburbs. When complete, the New M5 will cause an extra 50,000 cars per day into our suburbs. The proponent estimates our key local roads, such as King Georges, Stoney Creek, Canterbury, Forest, and Moorefields will need to absorb this additional traffic due to motorists avoiding the tolls.

I object to the public announcements that King Georges Road will have a 49% improvement in travel time, yet the EIS acknowledges that the current LoS-F (Level of Service) will be the same with our without WestConnex.

The EIS ignores the published work of independent traffic and planning experts who have presented evidence based arguments that the Westconnex will not meet its goals. It should be rejected on that basis alone.

I object to the decision by AECOM to do no serious traffic modelling outside the project area; it is absurd to suggest that the impacts will stop at the end of the project. Instead communities will be left to deal with traffic and unhealthy pollution and the additional financial and social costs that will result from WestConnex.

I object to the failure of the Sydney Motorway Corporation to publicly reveal the peer review of the traffic model and their failure to reveal the assumptions on which it is based so independent traffic planners can test its results.

POOR ANALYSIS OF ALTERNATIVES

I object to the superficial consideration of alternatives which consists of little more than bald claims rather than presenting analysis of alternatives including public transport and traffic management that could reduce road freight and car use.

TRUCK MOVEMENTS DURING CONSTRUCTION

I object to hundreds of trucks a day for years transporting millions of cubic metres of soil including contaminated waste (asbestos) through Kingsgrove and Moorefields Road to the Western suburbs where it will be dumped without any clear plans or information for communities affected.

DESTRUCTION OF BIODIVERSITY

The RMS was given approval to build the old M5 on condition that it protected endangered flora and fauna. Now it wants approval to destroy those communities for a new tollway because its old project has failed to solve congestion. This makes the system of conditions meaningless. This proposal should be rejected.

I object to removal of most of critically endangered Cooks River Iron Bark forest at Kingsgrove. I note that scientists have observed that its value has been deliberately minimised in the EIS.

I object to the removal of 7 hectares of habitat of one of only two surviving colonies in NSW of endangered Green and Golden Bell Frogs for a massive tunnelling site.

TUNNELLING IMPACTS

I object to the selection of tunnelling methods that may damage houses at the surface.

AIR QUALITY

I object to a transport 'solution' that results in a further nine unfiltered exhaust stacks throughout highly populated suburbs.

It is unacceptable that a 35 metre exhaust stack is located in the valley of Kingsgrove, with schools, homes and sporting fields on higher ground.

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 note that there will be an increase in dangerous pollution in some areas close to the tollway portals and near roads with increased traffic. It is not acceptable to me that a government should deliberately place the health of citizens in jeopardy.

I particularly object to tollway portals and increased traffic being so close to local schools. I note that fine particle pollution can cause lung cancer and is particularly dangerous for the lungs of growing children. I support the parents of local schools who have requested an extended period of time after school returns at the end of Janaury 2016 in which to seek independent advice.

URBAN LANDSCAPE DESIGN

I object to further deterioration to our amenity that this project will cause. Statements such as "the narrowed pedestrian access around the edge of the widened portion of the M5 East Motorway would not be out of character" completely dismisses the significant change to our urban environment with the legacy M5.

I particularly object to the transparent noise walls, as an "opportunity to enhance the driver experience with views across Canterbury Golf Course, Beverly Grove Park and Tallawalla St park". This demonstrates that urban repair for residents' is not a priority.

GREENHOUSE GAS EMISSIONS

The whole WestConnex system will increase greenhouse gas emissions in Sydney at a time when we should be doing all we can to reduce them. I am not convinced by a method of analysis which does not look at alternatives but instead compares the New M5 project against a 'do nothing' scenario to claim a reduction in greenhouse gas emissions.

In addition, no credible authority in the world today would suggest that building huge urban motorways is the solution to cutting national greenhouse emissions, or that increases in vehicle kilometres travelled (VKT) would somehow result in a net reduction in greenhouse gas emissions. Yet this is exactly what the proponent is claiming in this EIS. I object to this flawed analysis.

PROCESS

I object to a planning system that awards billion-dollar contracts to tollway construction company when local government staff and many experts are convinced the WestConnex will not deliver on its objectives. This places unreasonable pressure on planners to approve the project.

I object to the fact that AECOM who have a record of failed traffic modelling has been paid $13 million to complete this EIS while it has other contracts which depend on the project going ahead.

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Yours sincerely,

Cyprus Tutunoa

New South Wales 2099, Australia



[redacted]

From: Nicholas Malesevic [redacted]
Sent: Saturday, 9 January 2016 11:52 PM
To: DPE CSE Information Planning Mailbox
Subject: Submission to SSI 14_6788 WestConnex New M5

Attn: Secretary, Department of Planning and Environment

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Yours sincerely,

Nicholas Malesevic

Sydney NSW 2050, Australia



[redacted]

From: [redacted]
Sent: Monday, 22 February 2016 12:09 PM
To: [redacted]
Subject: FW: Submission Details for Jacqui Cowell (object)

Categories: Follow-up

[redacted] **On Behalf Of** Jacqui Cowell
Sent: Tuesday, 19 January 2016 2:42 PM
[redacted]
Subject: Submission Details for Jacqui Cowell (object)

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Jacqui Cowell
[redacted]

Address:
[redacted]

Alexandria, NSW
2015

Content:
I object to the WestConnext project as it will bring increased traffic on local roads, increased pollution and noise as well as taking away much needed parklands at Sydney Park.
This is a waste of taxpayers money and little thought has been given to the needs of the community and the future of the densely populated area.
Instead of more roads, we need more public transport as the population grows. The inner west and specifically Alexandria, Newtown and Camperdown would benefit from a light rail which would allow more commuters per hour than a motorway.
There is no advantage to the Westconnex M5 motorway. It will ruin Sydney Park and the community feel of the area. It will also mean that we have construction, noise and pollution whilst they build the motorway until 2023.
Surely, increasing the rail network, heavy rail or light rail or increasing buses is a more sensible way forward for the future.

[redacted]

Jacqui Cowell

[redacted]

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[redacted]

Name: Jacqui Cowell
[redacted]

Address:
[redacted]

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2015

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[redacted]

Name:

Address:

, NSW

Content:

[redacted]

[redacted]

SUBMISSION TO M5 EIS

Name Amy Chew ……
Full address [redacted] Alexandria……

I strongly object to the proposed New M5.

The roads around the St Peters interchange are already at an unacceptable Level of Service and are getting worse because of in-fill developments not allowed for by the EIS:
* Green Square: 61,000 residents
* Ashmore: 6,000 residents
* Waterloo Estate: 30,000 residents
* Central 2 Eveleigh: 56,000 residents, 25,000 workers

With an extra 150,000 people in an area of a few square kilometres, this is going to be the most densely populated area in Australia.

There is no evidence that the traffic models have factored in this huge increase in density that will occur in the area.

The EIS clearly demonstrates that the traffic on roads in the Alexandria area will deteriorate as a result of WestConnex. But it also predicts that Level of Service will improve at many intersections even if nothing is done – in the case of Euston Rd/Sydney Park Rd, from D to A, in the PM peak. This is clearly wrong - so wrong that it suggests that the traffic modelling is broken (the EIS does acknowledge that "modelling is probably optimistic") and it suggests that the level of service on local roads will be several levels worse than predicted, either with or without the project.

According to the business case, Euston Road is supposed to handle 61,000 cars on 3 lanes each way. This is almost 10 times what it can handle on 2 lanes. There is no way it can handle 61,000 cars, however many lanes are added to it. 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 the damage done to the area and cause rat-running.

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.

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.

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.

Finally, I strongly object to the quality of the EIS. There is too little information on the traffic volumes that will occur in Alexandria, and there is also conflicting information on possible mitigation strategies. Although the diagrams in the EIS show right-hand turn lanes in all four directions at the Sydney Park Road/Euston Road intersection, the text of "New M5 EIS Vol 2B App G Traffic and Transport" instead indicates that there will be a "banned right turn from Mitchell Road into Sydney Park Road [because of] the banned right turn southbound at the Sydney Park Road / Euston Road intersection". The text also indicates that there will be a "north-bound lane [which] will go as far as Maddox Street, where it becomes a new left-hand turn lane",

but the diagrams do not show this. Not having clarity on which of these two scenarios is planned makes informed consultation impossible. If these right-hand turns into Sydney Park Road are not permitted, there will be enormous volumes of traffic on local roads as drivers try to rat run. Likewise, the extra left-hand turn lane, if it is actually planned, seems destined to drive traffic onto local roads.

Roads, especially tunnels, are expensive, and move relatively few people - perhaps 2,000 vehicles per hour per lane. This is a fraction of what can be moved by heavy rail, or light rail, or bicycles. Even pedestrians can move more commuters per lane than can be moved by car.

The EIS business case says that with toll roads, "losses to investors [are typical] due to traffic demand forecast being overly optimistic. This has led to a situation where it is likely the private sector sponsors will be unwilling [and the NSW Government is likely to have] to take on all or part of the development and start up traffic risk". Why does the NSW government think that WestConnex can be profitable when the private sector does not?

I call for the M5 EIS not to proceed. As a NSW taxpayer, I want better value for money.

ADD YOUR OWN COMMENTS HERE:

I have not made a reportable political donation. (Circle the option that applies to you. If yes, you need to attach a Political Disclosures Donation Statement, available from the Department of Planning website).

How to lodge your submission:

ONLINE: http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=6788

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

IN PERSON: deliver it to the main desk of the Department of Planning, Information Office, 23-33 Bridge Street, Sydney NSW 2000

For more details, see http://www.arag.org.au

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[redacted]

Name: Louise Esler

[redacted]

Address:

[redacted]

Alexandria, NSW
2015

Content:
The west connex interchange is a disaster for Sydney. Studies continue to show that it will have no real benefits and will merely strangle an important Sydney cultural area and its surrounding suburbs.
Diverting the immense amount of funds to build this monstrosity away from investing in public transport for our future need is a disgusting mistake. While city's around the world are investing in their future Australia is going backward. The politicians who are driving this are astonishingly ignorant and self serving. .

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[redacted]

[redacted]

[redacted]

Name: Eloise Basuki
[redacted]

Address:
[redacted]

Erskineville , NSW
2043

Content:
The westconnex is a dated, bandaid solution to a 21st century problem. Investing in public transport is the answer to traffic congestion, not adding more roads! The west connex will dump thousands of additional vehicles into already congested roads not to mention impact the surrounding suburbs. Trees from Sydney park will be cut down to be replaced with more cars and major highways! This just makes no sense. Please look to the modern cities of Tokyo, Singapore and London who heavily invest in such efficient and environmentally friendly public transport to help the community travel such large distances in no time. Help to conserve the beautiful culture and surrounding environment s of the inner west, don't destroy it with rediculous and ugly roads that will be a detriment to tourism and the community. Let the community have faith that our government wants to ensure Sydney is a livable city for all.

[redacted]

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[redacted]

Name: Richard Capuano
[redacted]

Address:
[redacted]

St Peters, NSW
2044

Content:
Dear Sir/Madam,

I strongly object to this project and the entire WestConnex of which this is part, and ask that you reject this proposal on the basis of this environmental impact statement (EIS).

My home is being 'acquired' by the RMS - who've been nasty toward residents and treated us with considerable disrespect, despite assuring us we'd be looked after. Liars and cheats, that's all they are.

Many of my neighbours have already been cheated out of several hundred thousand dollars (if the RMS had a backbone, they'd recompense these residents), and the rest of us have just been issued with the PAN -- the RMS will take possession of our homes on 20 April, and I'm expected to rent from them -- what a load of rubbish.

Based on their pathetic offer (I was compared to a 2br semi, I have a 4br Terrace), I'll be seriously out of pocket and there's absolutely no way I can afford to purchase a similar home in the area... the stress and uncertainty over the last year has been soul-destroying and they didn't even stick to the legislated timeframe - but they don't care. I am now effectively homeless. Thanks.

The RMS has completely corrupted the Acquisition process and want it all their way, we have to fight for compensation - at taxpayer expense, but they don't care. We already know the review has stated the process is seriously flawed, and we should be able to buy a home similar to what we already have -- not be given some crap 'market value' they make up by deliberately undervaluing our homes by comparing us to inferior houses in inferior suburbs. Heck, their valuer had no idea what value to put on homes and chose the lowest value. Seriously, what a bunch of cowboys.

Myself and other neighbours will be fighting this all the way, the RMS has bullied/cheated us enough and we're fed up with them.

The WDA also put our health at risk by removing asbestos contaminated waste from the Alexandria Landfill past our homes (I wrote to the Dept Planning but you wouldn't get involved, and EPA let them do whatever they want).

WDA and Marrickville Council hid behind existing 'clean up' notices for the site, and commenced 'preparatory work' without proper approvals. [redacted] from EPA and [redacted] from WDA (two-faced liars) wouldn't even listen to our request to use the Burrows Rd entry away from residents (apparently because of the location of the wheel wash at Albert St, yet trucks were filthy) - we documented trucks spreading asbestos contaminated dirt throughout the residential area on Campbell St/Rd.

If we are to get some illness related to asbestos exposure, I seriously doubt the State Govt will help us and WDA will be gone... they're bullies and cowards, how dare they deliberately put our health at risk.

When we tried to call for a halt to work, WDA called Newtown Police (who witnessed the dust storms and dirty trucks, yet did nothing) and [redacted] read us the riot act while WDA staff stood behind them and laughed at us. Bullies.

Even Duncan Gay called us 'Nasty Little Anarchists' in parliament, how disrespectful after putting our health at risk... how dare this government think they can just walk all over us.

Since returning to work from Xmas/New Year holidays, WDA has removed the safety fence and started to rip up concrete near the entrance (I was expected to put up with loud jack hammering 10hrs/day) - this work goes far beyond the 'clean up' notices.

I had to yell at them to halt work... [redacted] told me they were operating under the Marrickville Council DA for the site (rubbish) while [redacted] pulled out some obscure clause from Environment blah blah blah 2007 to justify that the RMS 'doesn't need approval when it comes to preparing for roads'... corrupt liars, yet they won't be sacked.

You can also make out the alignment of proposed roads on the site, all of this so-called 'preparatory work' should've been approved by Dept Planning under the EIS... why has the government corrupted the approval process?

We get it, you'll just rubber stamp this dumb project and continue to walk all over residents. Thanks for crapping all over us.

[redacted]

[redacted]

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[redacted]

[redacted]

[redacted]

[redacted]

Name: john ONeill
[redacted]

Address:
[redacted]

Alexandria, NSW
2015

Content:
I wish to object to the Westconnex routing into Alexandria.

[redacted]

[redacted]

[redacted]

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SUBMISSION TO M5 EIS

[redacted]

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According to the business case, Euston Road is supposed to handle 61,000 cars on 3 lanes each way. This is almost 10 times what it can handle on 2 lanes. There is no way it can handle 61,000 cars, however many lanes are added to it. 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 the damage done to the area and cause rat-running.

Meanwhile, usage of the M5 is not growing, and has not grown for some years. This project only makes an existing road more expensive for commuters. It will save little time, if any, and at an exorbitant price. As the EIS acknowledges, the tolls are going to force drivers off the M5 and onto local roads, and no wonder. The Updated Strategic Business Case shows that for almost all of its users, the Value of Time saved is less than the cost of using WestConnex.

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.

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.

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.

Finally, I strongly object to the quality of the EIS. There is too little information on the traffic volumes that

will occur in Alexandria, and there is also conflicting information on possible mitigation strategies. Although the diagrams in the EIS show right-hand turn lanes in all four directions at the Sydney Park Road/Euston Road intersection, the text of "New M5 EIS Vol 2B App G Traffic and Transport" instead indicates that there will be a "banned right turn from Mitchell Road into Sydney Park Road [because of] the banned right turn southbound at the Sydney Park Road / Euston Road intersection". The text also indicates that there will be a "north-bound lane [which] will go as far as Maddox Street, where it becomes a new left-hand turn lane", but the diagrams do not show this. Not having clarity on which of these two scenarios is planned makes informed consultation impossible. If these right-hand turns into Sydney Park Road are not permitted, there will be enormous volumes of traffic on local roads as drivers try to rat run. Likewise, the extra left-hand turn lane, if it is actually planned, seems destined to drive traffic onto local roads.

Roads, especially tunnels, are expensive, and move relatively few people - perhaps 2,000 vehicles per hour per lane. This is a fraction of what can be moved by heavy rail, or light rail, or bicycles. Even pedestrians can move more commuters per lane than can be moved by car.

The EIS business case says that with toll roads, "losses to investors [are typical] due to traffic demand forecast being overly optimistic. This has led to a situation where it is likely the private sector sponsors will be unwilling [and the NSW Government is likely to have] to take on all or part of the development and start up traffic risk". Why does the NSW government think that WestConnex can be profitable when the private sector does not?

I call for the M5 EIS not to proceed. As a NSW taxpayer, I want better value for money.

ADD YOUR OWN COMMENTS HERE:

I have / have not made a reportable political donation. (Circle the option that applies to you. If yes, you need to attach a Political Disclosures Donation Statement, available from the Department of Planning website).

How to lodge your submission:

ONLINE: http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=6788

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

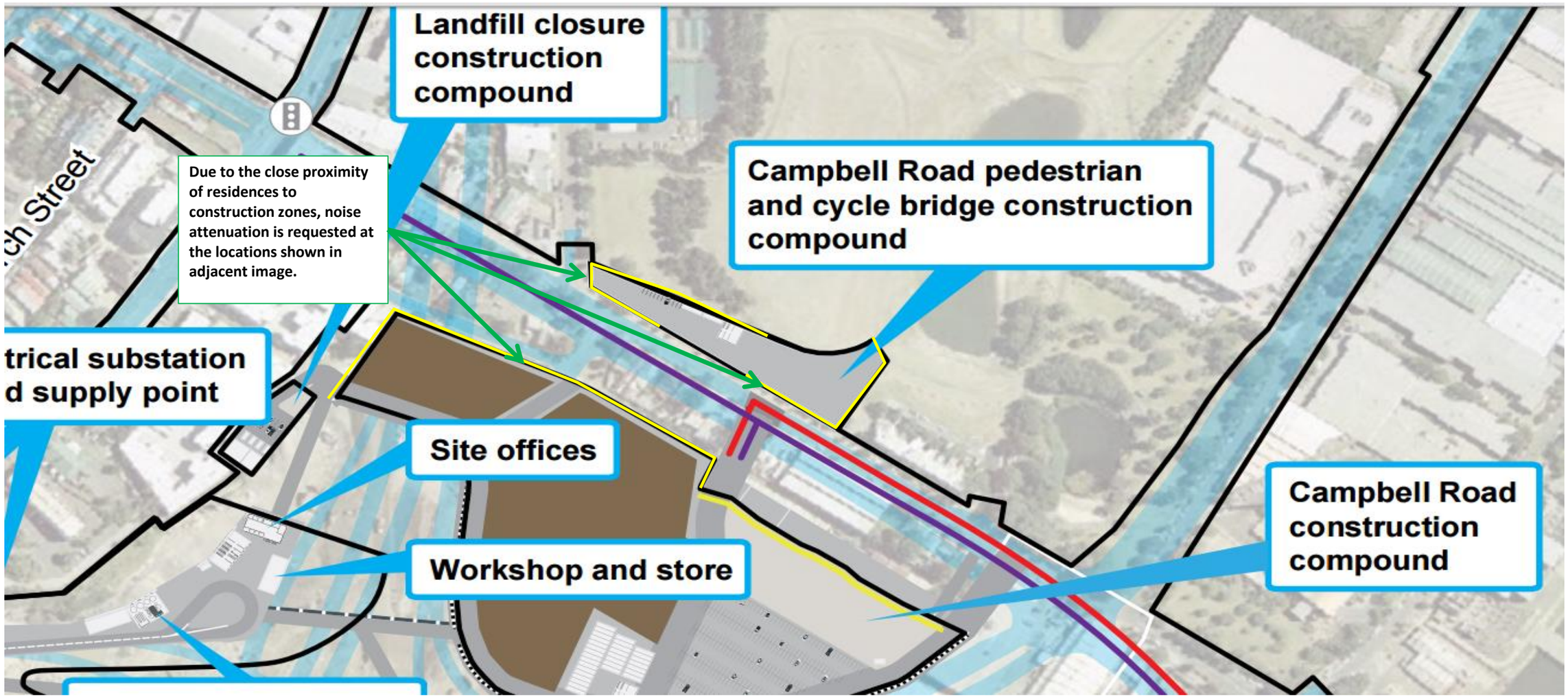
IN PERSON: deliver it to the main desk of the Department of Planning, Information Office, 23-33 Bridge Street, Sydney NSW 2000

For more details, see http://www.arag.org.au

[redacted]

[redacted]

[redacted]


Landfill closure construction compound
Due to the close proximity of residences to construction zones, noise attenuation is requested at the locations shown in adjacent image.
Campbell Road pedestrian and cycle bridge construction compound
trical substation
d supply point
Site offices
Workshop and store
Campbell Road construction compound



[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

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[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: Kathryn Calman
[redacted]

Address:
[redacted]

Beverly Hills, NSW
2209

Content:
I strongly object to the New M5 and the entire WestConnex project. I urge the Dept of Planning to reject.

[redacted]

[redacted]

[redacted]

Secretary
NSW Department of Planning & Environment
GPO Box 39, Sydney NSW 2001

Submission to DP & E. Project Number: SSI-14_6788 WestConnex New M5

Social and Economic Impact
Volume 1B – Chapter 15 and Appendix M

I strongly object to the project, and to the broader WestConnex scheme. The social and environmental impacts described in the EIS are unacceptable and far outweigh any alleged benefits of the project.

The importance of Community Values. Westconnex wants to destroy the very things we value – our enjoyment of our parks and greenspaces. The loss of significant trees. In a highly urban environment, the limited greenspace remaining is precious. Instead, what is planned for visually divisive motorway operation complexes, spaghetti interchanges and huge unfiltered exhaust stacks that are a constant reminder of the danger to our health.

The style of wording contained in the *Social and Economic Impact Report* is NOT the impartial assessment of a project determining 'given these social impacts, should the project go ahead?' but instead 'assuming the project goes ahead what will the impact be?'

Given this is a $17 Billion project - and that over one million people are highly impacted in one or more ways - it is damning that there are no real actual benefits to the community.

1 The Social and Economic Report (Report) states:

"Construction and operation of the project is expected to have social and economic benefits and impacts on communities and groups within and in the vicinity of the project corridor. The purpose of the Social and Economic Impact report (Volume 1B – chapter 15 and Appendix M) is to identify and assess these impacts and to identify management and mitigation measures to address these impacts".

"The assessment needs to provide an overview of the existing social and economic environments in which the project is located and the communities and businesses impacted (positively and negatively) by the project. The potential impacts are the outcome of the interaction between the project and the existing environment and are considered from local and regional perspectives".

It is noted from the Report that *"The preparation of the Social and Economic **did not** include direct consultation with businesses, individuals. community groups or industry. The primary research was limited to that undertaken by the project community consultation team and desktop inquiries".*

The WestConnex community consultation team has been strongly criticised for incomplete and misinformation to the public.

When the EIS refers to 'community consultation' it might be referring to what many members of the community have experienced as inadequate information provision. Some 'facts' may also be selected rather than others because they promote the case for the Westconnex. For example, for the KGR Interchange, only two of the fifty residents involved in the voting regarding the

transparent noise walls voted for the 28 meter option. Both these residents later admitted that they had not considered that this view would be of 12 lanes of motorway and had since changed their minds. There was an overwhelming support to reinstate the noise walls as existing (ie concrete) as per the contents contained in the EIS. WestConnex Community Liason staff are now informing callers to the info line that there is support for 'transparent walls' to allow more light. This is a misrepresentation of fact.

The Secretary of the NSW Department of Planning and Environment (DP&E) has issued a set of environmental assessment requirements for the project.

SEAR	Where addressed
A description of the existing socio-economic environment.	**Section 15.2**
Social and economic impacts to businesses and the community within the vicinity of the proposal, with associated property acquisition, traffic, access, property, public domain and open space, and amenity and health related changes (including the broader regional impacts associated with the closure of the Alexandria landfill site should this be part of the proposal).	**Section 15.3**
An assessment of the impact of the proposal on community facilities, including open space and recreational facilities. The assessment must include the use of existing facilities impacted by the proposal, and options and opportunities for the relocation and / or reconfiguration of the community facilities, both temporary and permanent.	**Section 15.3**
Impacts on directly affected properties and land uses, including impacts related to access, land use, settlement and subsidence associated with tunnel excavation, property acquisition (including relocations and expenses for those properties acquired) and amenity related changes.	**Section 15.3** **Chapter 13** (Land use and property) **Chapter 19** (Groundwater)
Where there are potential impacts to the OEH estate reserved under the National Parks and Wildlife Act 1974 or where the proposal is located upstream of OEH estate, an assessment of the matters to be considered outlined in the *Guidelines for developments adjoining land and water managed by DECCW* (DECCW, 2010a).	**Chapter 13** (Land use and property)
Opportunities for local centre and street revitalisation near the St Peters interchange.	**Appendix L** (Urban design report)
Potential impacts on utilities (including communications, electricity, gas, and water and sewerage) and the relocation of these utilities.	**Chapter 13** (Land use and property)
A draft Community Consultation Framework identifying relevant stakeholders, procedures for distributing information and receiving/responding to feedback and procedures for resolving stakeholder and community complaints during construction and operation. Key issues that must be addressed in the draft Strategy include: • traffic management (including property access, pedestrian access), • landscaping/urban design matters, • construction activities including out of hours work; and • noise and vibration mitigation and management.	**Appendix E** (Draft community consultation framework)

2 Description of the existing socio-economic environment

"Defining the relevant study area for the social and economic impact assessment, taking into account the extent or scale of the potential impacts of the project, including both direct and indirect impacts, and the context of the area surrounding the project."

*"This section is required to accurately report on **all** the sensitive receivers that are impacted".*

"The latest ABS Population statistics estimated resident population in 2013 was 660,000 people DP&E (Department of Planning and Environment, 2014) estimated that the population of the study area will reach approximately 850,000 residents in 2031. Between 2011 and 2031, it is estimated that Canterbury LGA will experience the smallest growth, with the population growing by 25 per cent over this period. Over the same period, Sydney LGA is projected to experience the greatest growth, with the population growing by 49 per cent."

Within the **Educational facilities** section there are a number of schools and day care centres that are **MISSING** from the list. The omission of sensitive receivers from this list is not acceptable.
The missing schools identified to date are:

- Our Lady of Fatima Primary, Caroline St Kingsgrove
- Bexley North Primary
- Kingsgrove Primary, Caroline / Stoney Ck (Impacted also by higher traffic on Stoney Ck)
- Kingsgrove High, Kingsgrove Rd / Stoney Ck (Impacted also by higher traffic on Stoney Ck)
- Babies Oasis (Day Care centre) Kingsgrove Ave
- St Pius, St Peters
- St Peters Community Preschool
- OOSH St Peters
- St Peters Playgroup
- Eskinville Primary
- And apparently more

Table 15-2 Educational facilities within the immediate vicinity of the project

Project area	Child care facilities	Primary schools	High schools	Tertiary education facilities
Western surface works	• Active Kids Beverly Hills • Active Kids Narwee • Barfa Bear Child Care Centre • Footsteps Early Learning Centre • Footsteps Early Learning Centre Oosh School Care • Kingsgrove World of Learning • Kids Oasis Childcare Centre	• Regina Coeli Catholic Primary School • Beverly Hills North Public School • McCallums Hill Public School	• Beverly Hills Girls High School • Kingsgrove North High School • St Ursula's College Catholic Girls High School	None in proximity to the works
Bexley surface works	None in proximity to the works	• Clemton Park Public School	None in proximity to the works	• Booth College, School for Christian Studies, Bexley North (Salvation Army)
Arncliffe surface works	• Busy Bee Long Day Child Care Centre • Do Re Mi Long Day Care Centre	• Arncliffe Public School • St Francis Xavier's Catholic Primary School	None in proximity to the works	None in proximity to the works
St Peters interchange	• Active Kids Mascot • Building Blocks Early Learning & Child Care Centre Alexandria • Sydney Park Child Care Centre • Lady Gowrie Child Centre Newtown • Camdenville Public School Preschool	• Camdenville Public School • St Peters Public School • Newtown Public School • Alexandria Park Community School (kindergarten to year 12)	• Alexandria Park Community School (kindergarten to year 12) • Tempe High School • Newtown High School of the Performing Arts	• Sydney TAFE Design Centre Enmore

Within the **Sports and Recreation Section** it is concerning that **sporting fields are MISSING** from the list. These parks are in CLOSE PROXIMITY of an unfiltered exhaust stack and tunnel portals:

- Clempton Park Kingsgrove
- Beverly Hills Park

- Cahill Park Arncliffe
- Bennet Park Roselands
- Beaumont Park Bexley North

Together with Kingsgrove Avenue Park, there are thousands of kids that play sport each winter weekend. Without an adequate measurement of air quality, the community is rightly concerned that kids breathing heavily during sport the concentrated toxins of a 9km tunnel.

This is an extraordinary omission and determines that insufficient analysis has been conducted both in the Social Impacts and Air Quality impacts.

Park / Recreation Area	Location	Impacted
Wolli Creek		
Cooks River		
M5 Linear park	Beverly Hills / Kinsgrove / Bexley Nth	Impacted
Bennet Park – sports fields	Roselands	**MISSING FROM LIST**
Beverly Grove Park	Kingsgrove - M5 Linear park	**10.7 hectares acquired. 2.6 hectares remain**
Forrester Reserve	M5 Linear park	
Kingsbury Reserve	M5 Linear park	
Kingsgrove Avenue Reserve	Bexley North	Impacted by unfiltered stack
Canterbury Golf Course	Kingsgrove	Partially acquired
Clempton Park – Sports Fields	Kingsgrove	**MISSING FROM LIST - highly impacted by unfiltered stack**
Beverly Hills Park – Sports Fields	Beverly Hills	**MISSING FROM LIST - highly impacted by unfiltered stack**
Beaumont Park - Sports	Bexley North	**MISSING FROM LIST**
Kogarah Golf Course	Arncliffe	**Significantly acquired**
Barton Park Public Driving Range	Arncliffe	
Riverine Park (Baseball & playing fields)	Arncliffe	
Banksia Field	Arncliffe	
Eve Street Wetlands – off limits to public	Arncliffe	
Cahill Park – Sports Field	Arncliffe	**MISSING FROM LIST - highly impacted by unfiltered stack**
Sydney Park	St Peters	**3 ½ acres acquired**
Simpson Park	St Peters	
Camdenville Park – Playing fields	St Peters	
May St Park	St Peters	

Table sourced from Chapter 10 – Air quality.

Table 10-16 Summary of RWR receiver types

Receiver type	Number	% of total
Child care / pre-school	25	0.05%
School	129	0.28%
Further education	9	0.02%
Aged care	14	0.03%
Residential	41,579	89.96%
Commercial	2,210	4.78%
Industrial	1,468	3.18%
Hotel	29	0.06%
Park / sport / recreation	136	0.29%
Public services	11	0.02%
Community	13	0.03%
Medical	101	0.22%
Religion	80	0.17%
Construction site	22	0.05%
Other	393	0.85%
Total	**46,219**	**100.0%**

The omission of schools, day care centres and sports fields that are directly impacted by construction and / or operations is concerning. It is also concerning that high impact suburbs – Bexley North and Arncliffe were not included in the introductory section of the report. – *"As the majority of the project would be in tunnels, physical and direct impacts would be limited to areas close to the western (ie at Kingsgrove and Beverly Hills) and eastern (ie at St Peters) extents of the project and at other locations where temporary (construction) and permanent (operational) surface infrastructure facilities are proposed for the project"*

It is therefore reasonable for the community to have **NO CONFIDENCE** in the completeness and accuracy of this Report.

On the grounds that the Social Impact assessment is profoundly inadequate, I strongly object to the New M5 and the WestConnex project in entirety.

3 Defining the Social Impacts

3.1 Amenity and health - construction

"Amenity contributes to a community's identity and its sense of place. Amenity impacts during construction would include factors that affect the ability of a resident, visitor or business owner to enjoy their home, business and/ or daily activities. These impacts may affect individuals in private homes, as well as the general public's use of educational facilities, shopping centres, cultural, sport and other recreational facilities."

"Increases in noise and vibration associated with construction works, including increases in road traffic from construction vehicles and the construction workforce

• *Increased dust and air emissions associated with surface disturbance and / or the handling, transport and disposal of soil, as well as vehicular emissions from construction vehicles*

• *Changes in visual amenity due to the introduction of construction compounds or activities*

• *Changes in traffic volumes and air quality resulting in changes in the health of residents and road users".*

Then the comment
"The majority of construction activity would occur underground, which would limit the extent of amenity impacts along the project corridor. Impacts would mainly arise at the locations of surface works, in proximity to construction sites and compounds and along transport routes used by construction traffic." Coupled with the introductory comment *"As the majority of the project would be in tunnels, physical and direct impacts would be limited to areas close to the western (ie at Kingsgrove and Beverly Hills) and eastern (ie at St Peters) extents of the project and at other locations where temporary (construction) and permanent (operational) surface infrastructure facilities are proposed for the project"*

This is a deliberate attempt to downplay the extent that construction will have on the community. No consideration has been taken into account to the noise and vibration that will occur with tunnelling activities, as well as significant construction vehicles through residential streets.

It does not include the cumulative impacts of air pollution that will envelope the entire region.

3.2 Mitigation

Construction
"*A community involvement plan would be implemented to provide timely, regular and transparent information about changes to access and traffic conditions, details of future work programs and general construction progress throughout the construction phase of the project. Information would be provided in a variety of ways including letter box drops, media releases, internet site, signage and a hotline*".

Thousands of homes, schools, and businesses will be affected by significant noise during construction and / or operation to a level that can damage health, while mitigation is recommended for some, no details are provided. Westconnex will provide no detailed plans until after approval, and in some case until after construction begins.

As a standard that is now known to expect – work has already been set with the King Georges Rd M5 Interchange, where temporary noise walls had been promised during construction. It is unreasonable for residents to accept that thin plywood can pass as 'noise walls'. It is also unreasonable for residents at Beverly Hills to accept the duration for noise walls to be down for 14 weeks (in sections) to find ALL noise walls are removed and have been down for 4 months – with some time yet for reinstallation.

On the basis that Westconnex have demonstrated a lack of effort in addressing high noise impacts to residents, I reject the new M5 and the entire WestConnex project.

3.3 Amenity and health - operational

On Completion of the project, there will be significant impacts on over a million people that will impact on the enjoyment and connectivity of their homes and suburbs:

- *Loss of own or neighbours homes including heritage homes*
- *Loss of businesses impacting local employment opportunities*
- *Significant loss of parks, trees and greenspace – contributing to the heat island affect*

- *Significantly increased traffic on local roads inhibiting residents ability to navigate within suburb*
- *Increased traffic noise on local roads causing sleep disturbance and inability to open windows*
- *Increased traffic noise from the motorway likewise causing sleep disturbance*
- *Increased pollution from unfiltered exhaust stacks and from induced traffic impacting health*
- *Increasing incidence of pollution hot spots.*
- *Continued car dependency due to lack of public transport investment*
- *Lack of independence for non-drivers, remaining reliant on parents or family for transport.*
- *Visually divisive motorway structures dominating our suburbs*
- *Demonstrated lack of commitment for urban rehabilitation that benefits the community*
- *Lost opportunity to have invested in public transport that would have made Sydney great and benefited millions of people (not just the financiers and toll road operators).*
- *Lost opportunity to divest more freight onto rail rather than road*

The loss of sense of place. The loss of the amenity and enjoyment of our homes and suburbs. The loss of those things that a community holds most dear, that loss being our parks and trees. The dominant obtrusive motorway operation complexes . Unfiltered exhaust stacks.

The cumulative impacts of decades of successive road projects has on communities has not been factored into the Social Impacts.

4 Benefits

It's quite damning for a $17 billion project that a search for 'benefits' yielded minimal results for the one million people that are impacted by the overall project.

This is about the only section found:

"The long term impact of the project on property values would be influenced by the long term benefits of the project as perceived in the land and property markets, arising from general overall improvements in amenity, including improved air quality, reduced traffic noise and improved road safety on local surface roads as traffic is diverted from them to the new tunnel".

Let's look at each of these 'benefits"

- **Property values?** - are always lower near major roads and higher near public transport. With a "value decline" for 10's thousands households across the route, can these residents expect payment to compensate for loss the loss of value caused by Westconnex, ie a reverse to 'value add' proposals?.
- **Improved Amenity?** - Westconnex will impose a significant loss of amenity with the fracturing of community through acquisitions, the "Berlin Wall" impact of noise walls, the resumption of parks and a significant loss in trees and greenspace – replaced with a polluting road. The minimalistic cheap urban landscape designs returned to the communities, such as witnessed by the KGR Interchange designs. Traffic noise resulting in inability to open windows and in some highly impacted areas, unable to even use their backyard. Amenity?
- **Air quality improvement?** Nine unfiltered exhaust stacks located near schools, homes and playing fields. An additional 50,000 vehicles per day to be absorbed on the western end local roads will exacerbate an already congested and polluted environment and 60,000 at the Eastern end. We should be addressing the existing dangerous levels of pollution people are currently exposed to. It is not acceptable to identify that an area that is already exposed to high pollution levels, and thus a 'little more' is a negligible impact. What an extraordinary attitude, particularly in light that there has been a 68% increase of deaths in

Australia from pollution between 2005 and 2010. http://www.smh.com.au/federal-politics/political-news/air-pollution-takes-toll-on-australian-lives-economy-oecd-report-20140522-38rre.html#ixzz3y4EmFZDb

- **Reduced traffic noise?** Can only be set to increase, as no attempt to reduce traffic volumes on our roads is being undertaken. Quite the converse. Other infrastructure projects seemed designed to further increase traffic volumes (such as the closing of the Bankstown Train line for 11 months). Alleged mitigation measures, such as the 'quiet' road surfacing is only short term as it wears away. There is also no effort to pass legislation to catch and fine excessively noisy vehicles.
- **Improved Road safety of local roads?** With our local roads modelled to expect significant increase in traffic – 50,000 additional on the Western end and 60,000 in the Eastern end, how is local road safety being improved? Key local roads expected to absorb such high additional daily capacity will result in an increase of rat runners through the more residential streets.
- **Cycling at Kingsgrove** – the EIS has also stated improvements. What? Reducing size of Beverly Grove Park. Destroying all the trees. Destroying the Cooks River Clay Plain scrub forest. Replacing the current walkway view of trees with a transparent noise wall as an opportunity to 'enhance the motorists experience'. Removing the cycle lane off the legacy M5, expecting these proficient riders to mix in with recreational cyclists including small children. Installing an unfiltered exhaust stack as a constant reminder of the health impacts. **Sorry – please explain where are the unstated 'benefits' for Kinsgrove cyclists**.

And then this comment contained in the EIS:
"The provision of a new motorway standard connection between St Peters and Kingsgrove, and the possible future connection to the rest of the WestConnex program of works, is likely to increase the desirability of residential, commercial and industrial developments particularly around motorway access points. This improved connectivity and reduced traffic congestion may make some areas more desirable for living and working than is currently the case. Changes in desirability are likely to gradually affect the nature and scale of development around key project connection points over time"

Location of residences close to major roads are regarded as a **dis-amenity** due to pollutant emissions, high traffic noise, loss of amenity with acquisition of parks and greenspaces, loss of aesthetics with dominant motorway operation complexes. The above statement contained in the EIS is nonsense. All impacted residents and businesses should be entitled to a 'value-loss' to compensate.

5 Community Values

"The identification of community values was also undertaken using local councils' community strategic planning documents. These values were identified to aid the assessment of potential social and economic impacts, provide insight into how the community may perceive these impacts, and assist in the assessment of indirect impacts on community identity, cohesion and sense of place."

The Councils contribution to the values that the various communities have is quite accurate.

There has been no effort to link these community values to any alleged benefits that Westconnex will bring to our communities. It is a requirement to address community values in infrasructure design.

Road

The social and economic study area is characterised by a number of major motorways and arterial roads. The extensive road network means that travel by car is common. Car trips (as a driver or passenger) were the most common mode of travel to work in Canterbury (71.8 per cent), Hurstville (67.3 per cent), Rockdale (68.1 per cent), Botany Bay (68.1 per cent) and Marrickville (48.9 per cent) LGAs. Car trips (as a driver or passenger) were the second most common mode of travel in Sydney CBD, behind walking, accounting for 30.4 per cent of total trips to work.

The result of 30 years neglect of public transport has meant that public transport has not kept pace with the changing employment patterns of Sydney workers. For people that do not work in the CBD, the lack of reasonable transport has forced people to commute by car.

It is obvious that commuters prefer public transport. Three recent examples.

- The reduction of train fares at Green Square and Mascot has resulted in a significant increase in patronage. What was empty stations for 10 years due to outrageous fares now are bustling stations.
- The increased use of the Inner-West Light Rail with patronage up 60% from last year with 90 extra trips planned.
- Gold Coast Light Rail. This is also an excellent example that it is the provision of public transport that aids the performance of the road network. The parallel Gold Coast Hwy performance has improved.

It is so obvious that Public transport is enormously popular. As a heavy user of Public Transport throughout the week and weekend, at various times of the day, there is high patronage of our rail system.

I object to the New M5 and the Westconnex project in entirety. The strategic justification is weak and inconsistent with the NSW Governments Strategy planning and policy framework.

I consider that is a false claim that WestConnex was front and centre of the NSW Transport Master Plan 2012, when it is painfully obvious that it was shoehorned into the document in 2013. The inclusion of WestConnex in this document contradicts the main objective – to reduce car dependency, promote active transport, and enhance the livability of our suburbs.

There has been **no** compelling case for Westconnex to be built. It is shocking that the Sydney Motorway Corporation has now admitted that the New M5 will not work as a stand-alone project. It is also shocking that Sydney Motorway Corporation have advised that their traffic model does not function properly and presents results that can be misleading.

This is extraordinarily poor planning to plunge into a road project with inadequate assessment that then it is discovered that a myriad of more and more expensive toll roads, and more and more road widening in a desperate effort to make it work. This is extraordinary poor planning, and thus reasonable for the community to consider that this is road planning on the run.

WestConnex claim the main purpose of the project is for the transport of freight from Port Botany. Yet the new M5 does not go anywhere near Port Botany. It is now relying on an extension – the Sydney Gateway for this route. The concern with this extension is the impact this will have on the existing rail freight line.

It is reasonable for the NSW Public have a right to know the full costs and the full extent of the motorway plans for an informed decision if this is what the Public want for Sydney, and whether the social, environmental and financial impacts are worth it . Not by section with alleged benefits stated from the overall project, but the impacts limited to just that section.

I consider that the lack of proper initial assessment and the lack of gateway reviews has resulted in the wrong infrastructure project being selected for Sydney. We have seen how popular the Inner-West Light rail, with an increase of patronage at 68% for the past year requiring an additional 90 services required. This is the sort of projects that enable Sydney to get moving, without the huge Social and Financial costs.

I strongly object to the entire WestConnex project as 33 km of communities are expected to give up the amenity of their suburbs for a road project that fails to meet any of its objectives.

Kathryn Calman

Beverly Hills

[redacted]

[redacted]

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Name: Kathryn Calman
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Address:
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Beverly Hills, NSW
2209

Content:
I strongly object to the entire WestConnex project as the strategic justification is weak. It is a poorly planned project.

[redacted]

[redacted]

[redacted]

Secretary
NSW Department of Planning and Environment
GPO Box 39, Sydney, NSW 2001

Submission to DP&E Project Number: SSI 14_6788 WestConnex New M5

I object to the New M5 and the Westconnex project in entirety. The strategic justification is weak and inconsistent with the NSW Governments Strategy planning and policy framework.

WestConnex, if completed, will be Australia's largest ever motorway and toll-road project. It is reasonable for the Public to be very concerned that the cost of this project has grown to $16.8 Billion which is not wholly funded, and presents a significant opportunity cost. This level of investment could deliver other projects of significant economic and social value to the state which would benefit a greater number of people and businesses.

I strongly object to the project, and to the broader WestConnex scheme. The M5 Linear Park and what is left of the Beverly Grove Park was a mitigation to the residents for the legacy M5. The protection of the Cooks River Clay Plain Scrub Forest was a condition of approval. What is the point of mitigation and conditions of approval, to be ignored just 15 years later?.

It is unreasonable to expect the same communities to endure years of construction for a road project that fails strategic Justification.

There has been **no** compelling case for Westconnex to be built. It is shocking that the Sydney Motorway Corporation has now admitted that the New M5 will not work as a stand-alone project. It is also shocking that Sydney Motorway Corporation have advised that their traffic model does not function properly and presents results that can be misleading.

This is extraordinarily poor planning to plunge into a road project with inadequate assessment that then it is discovered that a myriad of more and more expensive toll roads, and more and more road widening in a desperate effort to make it work. This is extraordinary poor planning, and thus reasonable for the community to consider that this is road planning on the run.

The cumulative Impact of Road Building on Communities:

The communities of Beverly Hills, Kingsgrove, Bexley North, Earlwood and Arncliffe lived through years of construction for the first M5 circa 2001, (Legacy M5). We were granted mitigations for this endurance.

The legacy M5 resulted in a 'Berlin Wall' effect that separated our community into two. The North and South sides. It also had a devastating impact on residents in regards to pollution. Turrella and Earlwood, with an unfiltered exhaust stack, and Bexley North and Arncliffe with tunnel portals (openings).

Homes, the trees and parks taken. Years of construction, and then, to thank us for our endurance, we were handed cheap, visually divisive noise walls and poor urban design. The urban design and landscaping was of such a poor standard that Allambee Crescent Nth Beverly Hills actually features in the RMS Landscape and Design Principles as an excellent example of what **NOT to** do.

Allambee Crescent Nth Beverly Hills circa 2015.


Screenshot from the RMS Urban Landscape Design Principles


The noise wall is visually divisive and bears no contextual relationship to the setting in this residential area on the Northern side of the M5 East

It is a credit to Council and a few residents of these communities that they took the repair of our environment into our own hands. **We had no choice because the RMS would not**.



“Landscaping” by the Community & Canterbury Council – maturing growth circa 2015 below



The M5 turned out to be a noisy congested old fashioned solution to traffic congestion. But the NSW government has learned nothing. Again last year we found ourselves faced with new projects. Firstly there was the expansion of the King Georges Road Interchange and now a duplicate of the old failed M5 – call the New M5

What standard of repair can we expect from Westconnex 15 years later?

A review of the current KGR M5 Interchange Landscape Design shows that nothing has changed in the last 15 years. WestCONnex has already demonstrated the same scant regard for communities and offers only minimal rehabilitation after construction.

We are faced with the mature vegetation being stripped away as the walls are torn down for the early stage of the widening of the King Georges Interchange, which according to Westconnex's own figures will leave the intersection at the worst Level of Service (F). We have engaged with every part of the process. At a landscape review meeting some months back, AECOM Landscape Designer (Frank) advised residents that hundreds of metres of wall

would remain bare because it is easier for maintenance crews to inspect. When we showed him evidence lifted from RMS's own *Urban Landscape Design Principles* on how to deal with pinch points, we were later advised that there are now *'new WestConnex Urban Design Principles'.*

When we questioned why the Cooloongatta Rd bridge section would contain transparent walls, we were told it was to protect cyclists. When we could find no reference to this in any of the cyclist safety guideline documents we were referred to, we were told that it was a '*new WestConnex Safety Guideline*' criteria. Unfortunately, it wasn't available to be shared with the public. There is so much material that's not shared with the public!

One could be forgiven for thinking WestConnex are making it up as they go along.

The picture below is near the Cooloongatta Rd. Bridge. It's an example of native plantings successfully used in legacy M5 to improve the visual harshness of a concrete noise wall in a narrow space. These shrubs reached the top of the wall, just prior to being destroyed by in September 2015. The new plan for this section is transparent noise walls. Community backlash, including the involvement of local MPs, have forced WestConnex to reduce the length to 12 metres, down from the original 28 metres. We want concrete, as transparent noise walls for the benefit of the M5 motorist is unreasonable to the community. I also take exception that our request for Perspex to span the Cooloongatta Rd Bridge instead of the wire was rejected as an unreasonable expense to enable resident some noise attenuation.



Westconnex Framework for design – objectives or merely buzzwords?

- leading edge environmental responsiveness
- connectivity and legibility
- place making
- livability and urban renewal
- memorable identity and a safe, pleasant experience
- a new quality benchmark.

Let’s review the New M5 Linear walk impacts against these objectives from a community perspective. We can then decide whether it is reasonable for the community to accept them.

Why does the M5 Linear Park matter?

The M5 Linear Park is an off-road shared path that runs parallel to the M5 East Motorway between Belmore Road, Riverwood and Bexley Road, Kingsgrove. The M5 Linear walk is used by hundreds of people each day.

The linear pathway is an important active transport artery that connects the community members to each other, as well as schools, shops and train stations. Older children can safely cycle to sports training or friends' homes without having to cross a road.

It's a lovely place to walk or cycle aiding both physical and psychological well-being, reducing stress and reconnecting with nature. Within a highly built urban environment, such as at Beverly Hills, you highly value our remnant of natural bushland and plantings that complement it.

Now unbelievably, much of this natural and planted landscape along our linear walk – including the critically endangered Cooks River Clay Plain Scrub Forest – is planned for destruction.

WestCONnex designers have taken the opportunity with their noise wall design to enhance the motorist experience. 1200 metres of transparent noise walls to the north and 700 metres to the south would provide drivers with views across the golf course, Beverly Grove Park and Tallawalla St. Park. From the walker's perspective, almost two kilometres of our pathway would overlook lanes of motorway from behind a plastic wall.

This design is neither reasonable nor moral for our community to accept.

M5 Linear walk – Cooks River Clay scrub forest. Beverly Hills North circa 2015



The above scene would be replaced by a transparent noise wall allowing the walker a view of 10 lanes of motorway. An artistic impression below. Fancy walking here?



The photo below is the Southern side of the M5 Linear Walk west of Tallawalla Street. This is near WestCONnex's proposed location for an unfiltered exhaust stack and a motorway operations complex and tunnel portals.



This section of our walkway will be replaced by a uniform and monotonous landscape design (pictured below). The human brain is hardwired to appreciate the diversity, the complexity and the changing form of our environment, whether built or natural.

A dominant feature in this landscape would be a 33 metre tall unfiltered exhaust stack and a motorway complex. This ‘chimney’ stack will spew concentrated toxins from a 9 km tunnel – a reminder to all us walkers and cyclists of the constant serious threat to our health.

The enjoyment of walkers would be further marred by high noise. The tunnel portals require noisy industrial size fans to manage vehicle emissions which would add to the ever present high traffic noise.

An unfiltered exhaust stack in the valley of Kingsgrove is not reasonable for our community and should not be accepted.



Figure 21 Indicative maintenance facility at Kingsgrove perspective B

Beverly Grove Park

Beverly Grove Park is a peaceful environment except for raucous birds delighting the community at dusk and the laughter of children at play. It's a quiet haven from traffic, protected by a noise mound. But the park was not always like this. After the first M5, it took years before the soil regenerated enough to support vegetation. Today, trees have just reached the sufficient maturity to support native fauna. If left alone they would grow a lot more, creating more shade and cooling.

WestConnex would acquisition the whole park for a construction compound:

- Hoarding (four metres high)
- Temporary noise barriers (around 2.5 metres high)
- Car parking
- Tunnel shaft within an acoustic spoil shed and associated haulage
- Site offices and crib area
- Storage areas
- Access between the northern and southern side for construction traffic via the existing Kindilan Underpass
- Sedimentation pond

Tunnelling works will be conducted 24 hours per day. Heavy truck movements would transport tunnel spoil (including asbestos) past hundreds of homes and two schools via Kingsgrove and Moorefields Roads. Residents would have to endure a truck movement every minute, 24 hours per day.

It's not reasonable for a community to accept such volumes of heavy truck movements through its residential streets.

It's not reasonable for any community to accept the standards of asbestos removal as witnessed at the Alexandria Landfill at St Peters.

Beverly Grove Park – North.



After 4 years of construction, **10.7 hectares of our Beverly Grove Park would be retained for the M5**, with only 2.6 hectares returned to the community. The below diagram shows the proposed rehabilitation. Note the transparent noise walls and the view of the unfiltered

exhaust stack in the valley – and the minimal plantings that even after 10 years fail to obscure the noise walls.

The drawing depth indicating size of the park is questionable.



The architectural treatment of the ventilation facilities would be confirmed during detailed design as discussed in Chapter 2.

Figure 6-54 Photomontage showing the change to view from the end of Glamis Street at project completion (opening)

Artists impression of Beverly Park later. Are people expected to feel good about walking and their children playing near an unfiltered ventilation stack?



The architectural treatment of the ventilation facilities would be confirmed during detailed design as discussed in Chapter 2.

Figure 6-55 Photomontage showing the change to view from the end of Glamis Street, ten years after opening

By the end of the 2020s, the park may be dotted with some trees again

It is not reasonable for a community to accept a landscaping design that benefits the motorist at significant expense of residents.

Now lets look at Beverly Grove Park South. This path will become an access road to the Motorway complex.



Kindlean Underpass

The community fought for this underpass in the legacy M5 project. It's key to community links. The current underpass is 26 metres long. Even at night, the underpass is short enough for pedestrians not to fear apprehensive. It is well lit with a clear view of the surroundings.

The WestConnex proposal would extend the underpass by a further 50 metres. In effect, it would **become a long 76 metre tunnel**. C**lear views of the surroundings and a sense of quick escape would be lost. This could lead to a sense of foreboding for those entering the tunnel. This may inhibit walkers, particularly women, from exercising in the evening.** Given these cumulative impacts on the M5 linear park, it's obvious that it will be used less and because it is used less, it will not be as safe.

The impact of these changes for residents who use the M5 Linear pathway should be assessed as 'High'. No mitigation is proposed in the EIS. It is therefore not reasonable for the community to accept the loss of their parks and social amenity.



Artist impression of a significantly longer tunnel



Westconnex's justification for proposed urban landscape designs

Rhe RMS and Westconnex do not consider the cumulative impacts of road construction of the legacy M5 and the New M5 on our community in the EIS. This is disengenuous. They then justify even further destruction of our suburbs. Our environment becomes merely 'an already disturbed LGA'. This is not acceptable. To quote one of many examples, the EIS discusses the Motorway Operations Complex in the following way:

"The MOC2 shares a boundary with the M5 Linear Park. Although this narrow parkland is used for public recreation, the land is zoned SP2 Infrastructure and is closely associated with the M5 East Motorway, having been created as a legacy project for the construction of the motorway. The change within the MOC2 site (from public open space to the MOC2) does constitute a significant character change from the existing condition, but as the zoned SP2 Infrastructure, this change is (therefore) acceptable within the anticipated character of the site considering the current zoning. Using other areas within the M5 Linear Park as a bench mark, the narrowed pedestrian and cycle access around the edge of the MOC2 would not be out of character for this linear park."

Yes, there are instances where the amenity of the pathway is a low standard, such as behind Gareema Circuit heading to Kingsgrove Road (pictured below). Although these visually divisive sections do exist, the fact that they exist shouldn't then be used as the benchmark of 'the character' that provides the excuse to degrade the rest of our walkway and urban environment to the same low standard.

It is not reasonable for the community to accept such justifications for the destruction of the environment.

Location – M5 linear walk behind Gareema Circuit Business Park. Circa 2015. Example of sub-standard urban design that should never become a 'benchmark' of character.



Westconnex Framework – does it meet objectives?

The Westconnex Framework objectives are supposed to have been developed to create a project that best benefits road users and the community:

- leading edge environmental responsiveness
- connectivity and legibility

- place making
- livability and urban renewal
- memorable identity and a safe, pleasant experience
- a new quality benchmark.

Let's revisit these objectives in light of the impacts.

The loss of the Cooks River Clay Plain Scrub Forest

The new M5 tunnel from King Georges Rd to St Peters will destroy 1.4 of 1.87 hectares of critically endangered Cooks River Clay Plain Scrub Forest. This was a condition of approval for the legacy M5. So precious is this woodland that it is protected by a fence. According to the EIS, WestCONnex has not been able to locate a 'like-for-like' to offset the loss. Instead, the EIS has deliberately adopted language that suggests this forest is 'insignificant" and has 'low long term viability'. In reality, it is a healthy stunning forest.

It is not reasonable for the wider community to accept that although there are no appropriate offsets for significant impacts on biodiversity, WestCONnex should be permitted to destroy a critically endangered bushland in its path.

The loss of tree canopy

WestConnex plans to expose almost 2km of the pathway to transparent noise walls. Minimal revegetation is planned as the aim is to provide motorists with perspective and pleasant views across the park. The presence of a prominent new structure, a 33 metre high unfiltered exhaust stack, will continually remind residents that they are breathing dangerous pollutants.

It is not reasonable for a community to accept that priority is given to motorists at the expense of residents.

Loss of safety

The current M5 Linear Park provides a pleasurable walk for most of the journey. The WestCONnex proposal will be significantly reduce its size. Many trees will be destroyed and replaced with views of a 10 lane motorway. The enjoyment of this walkway will be significantly diminished. The current level of patronage makes this walkway safe. The loss in amenity will result in less patronage.

It is not reasonable for a community to accept a loss of safety when exercising or visiting shops, schools and train stations.

Conclusion

I strongly reject and urge others to reject the new M5 and the entire WestCONnex project on the grounds that the NSW Government is rushing ahead without forethought or care for the consequences of a project. I believe that the project will destroy much of what we value and will be a substantial waste of public money.

I object to the fact that the **cumulative impacts of motorways are not assessed**. The impacts resulting from the legacy M5 combined with the new M5 should have been considered in the EIS.

It is unreasonable to ask the same community – within 15 years – to go through construction and loss again.

I further object to WestConnex community liaison staff **concealing information from residents.** The KGR M5 Interchange EIS stated that noise walls will be reinstated in their current form.

Westconnex have never properly disclosed that their plans include hundreds of metres of transparent walls to benefit the driver experience and perspective. It is indeed shocking that almost 2km of our walls will be plastic. **That is not reasonable for a community to accept.**

In considering this whole project, **never forget that** the communities of **Beverly Hills, Kingsgrove, Bexley North, Earlwood and Arncliffe** lived through years of construction for the first M5 circa 2001, (Legacy M5) and have been leaving with its impacts ever since.

There are far better solutions to transport people and freight. It's called Public Transport. It is less divisive on a community (apart from the fact you pull down 100 yo trees rather than upset the Racecourse development plans). It is more efficient and better for the environment.

We need planners in our city to be innovative in their approach to addressing congestion. Not a 1950's approach that advanced cities discarded decades ago.

I realise that the Department of Planning is under a lot of pressure to approve the WestConnex project. I urge you to do the right thing for Sydney and our future. Reject is the only option.

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Content:
THE HERDING EFFECT
It seems inevitable that EDGWARE road will be to be turned into a clearway to attempt to mitigate the impact of funneling this amount of increased traffic volume into the existing 2 lanes of traffic. This is completely unacceptable. This is a residential street which cannot be turned into a clearway without significant loss of amenity for all residents. The EIS has a requirement to adequately address the severe economic, social, health and environment impacts of the proposal on all the residents of Edgeware road and surrounding local roads including the scenario of implementing clearway restrictions on this road

Just another zillion reasons to object to the westconnex

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Content:
I object to any loss of Green Space in Sydney to this Dirty Toll Road. We need more Green Space not less.
I deplore the cutting down of any Sydney Trees for this Dirty Toll Road.
I object to Sydney Motorway Corporation's half baked decisions and failures to explain.
I deplore the increased car traffic in local roads. We should be actively lessening this in Sydney in 2016 and into our future.
Unfiltered exhaust stacks in 2016?? Seriously?
We should all be working towards a Modern City - not rehashing failed concepts from the Fifties.
The EIS confirms that this Dirty Toll Road will have significant negative impacts for Society, the Environment and the Economy.
We don't want it - why continue with this destruction?

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Content:
HOW CAN THE GOVERNMENT THINK THAT DESTROYING AND POLLUTING OUR ENVIROMENT IS A GOOD THING???
The New M5 and whole westconnex will be a massive contributor to greenhouse gas emissions, while destroying important habitat and greenspace. There is NO safe level of fine particle exposure. Through this project and the entire WestCONnex of which it is part, the NSW Government is consciously building a project that it knows will worsen already high levels of pollution in parts of the inner west and south-west Sydney.
Just many more reasons to object to the westconnex

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[redacted]

[redacted]

[redacted]

Name: Colin charlton
[redacted]

Address:
[redacted]

Bondi, NSW
2026

Content:
From WestConnex website community opposition https://publish.viostream.com/play/179qaabn7j1nq

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[redacted]

Political Donations Disclosure Statement to Minister or the Director-General

If you are required under section 147(3) of the Environmental Planning and Assessment Act 1979 *to disclose any political donations (see Page 1 for details), please fill in this form and sign below.*

Disclosure statement details

Name of person making this disclosure	Planning application reference (e.g. DA number, planning application title or reference, property address or other description)
COLIN CHARLTON	SSI 6307

Your interest in the planning application (circle relevant option below)

You are the APPLICANT **YES / NO** OR You are a PERSON MAKING A SUBMISSION IN RELATION TO AN APPLICATION **(YES) / NO**

Reportable political donations made by person making this declaration or by other relevant persons

** State below any reportable political donations **you have made** over the 'relevant period' (see glossary on page 2). If the donation was made by an entity (and not by you as an individual) include the Australian Business Number (ABN).*

** If you are the **applicant** of a relevant planning application state below any reportable political donations that you know, or ought reasonably to know, were made by any persons with a financial interest in the planning application, OR*

** If you are a **person making a submission** in relation to an application, state below any reportable political donations that you know, or ought reasonably to know, were made by an associate.*

Name of donor (or ABN if an entity)	Donor's residential address or entity's registered address or other official office of the donor	Name of party or person for whose benefit the donation was made	Date donation made	Amount/ value of donation
COLIN CHARLTON	2/71 REDMYRE ST BONDI	THE GREENS	19/9/14	20
"	"	"	23/9/14	2200
"	"	"	29/9/14	240
"	"	"	20/3/15	1000

Please list all reportable political donations—additional space is provided overleaf if required.

By signing below, I/we hereby declare that all information contained within this statement is accurate at the time of signing.

Signature(s) and Date C. Ch. 29/10/15

Name(s) COLIN CHARLTON.

Cont...

Political Donations Disclosure Statement to Minister or the Director-General

Name of donor (or ABN if an entity)	Donor's residential address or entity's registered address or other official office of the donor	Name of party or person for whose benefit the donation was made	Date donation made	Amount/ value of donation
COLIN CHARLTON	2/71 EDWARD ST BONDI	THE GREENS	19/9/14	20
"	"	"	20/6/15	120

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: Didier Poisseroux

[redacted]

Address:

[redacted]

Newtown, NSW

2042

Content:

STOP Westconnex now please.

What a waste of money for a city with such a bad public transport offer. If you compare the tranport in Sydney to city like London, New York or Paris, anyone with good common sense will realise how bad the public transport is in Sydney.

The Sydney Park was just renewed, it is beloved by all SydneySiders and you are planning to destroy the great feeling and the view from there.

Newtown is such a preserved area, king street is without any doubt the most attractive street for shopping, and socialise. Keep preserving it.

The St Peters interchange looks like nothing but a disaster in terms of environment, architecture and impact on Western Subburbs.

Please invest this money in public transport. I'm lucky enough to live in Newtown, having Newtown and Erskineville Station at a foot step. Extend the train offers, allowing people outside the city to easily reach it by train, metro. I always had a car while in Europe, I'm Australian now, and I did get

rid of my car 5 years ago, using car sharing as a good option. You have to deliver solutions to decrease the numbers of cars and certainly not encouraging people to buy more.

In Paris, you have a metro every two minutes, in London, every one minute sometimes, even in Moscow. But in Sydney, the politicians continue to think that a train every fifteen minutes is an acceptable option. No... It is not...



[redacted]

Name: Laurent Jonckheer

[redacted]

Address:

[redacted]

Newtown, NSW

2042

Content:

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[redacted]

Content:
See attached submission

Green and Golden Bell Frogs - Number will be decimated
as WestConnex use their habitat as a multipurpose and parking area.

Not only does the EIS anticipate a number of frogs will be killed during construction, it's likely they could be relocated to an area adjacent to Eve St. This location is right next to a busy multi lane road which at some point in the future could also be widened at the whim of the government. The frogs will never survive with this continuous adverse interference.

[redacted]

NSW Department of Planning **and Environment**

This specific Submission is on M5 WestConnex EIS – Biodiversity – Green and Golden Bell Frogs of the Kogarah Golf Course.

I lodge a strong objection to the destruction of the Green and Golden Bell Frog and to the entire WestConnex.

Introduction

The WestConnex plan to widen Marsh St as part of its overall aim to expand the M5 roadway destroying a critical section of Frog habitat at the Kogarah Golf Course which it says can't be avoided. The WestConnex frog management plan is not adequate for their protection. That and the extensive period of destructive action/s by the WestConnex of more than four years (after including an unfiltered emissions stack) at this location will severely impact the Green and Golden Bell Frog potentially eradicating the sensitive species from this site and area.

For a project of this size, the biggest in the world, it lacks transparency and independent review. There are far too many contentious and damaging outcomes which do not value add to the project going ahead or to the city when it's finished. As such it should not proceed. However the NSW Government has rushed ahead without forethought or care to the consequences of a project that will destroy so much of what we value and will be a huge waste of public money.

Items of Significance – M5 impacts to critical environments

The M5 WestConnex EIS at page 12 of the M5 - Biodiversity Assessment Report identified the Green and Golden Bell frog amongst the three items of high significance which had been assessed for potential impacts from the project as follows:

Endangered Ecological Communities are:

· Cooks River / Castlereagh Ironbark Forest of the Sydney Basin Bioregion.

Threatened Fauna

· *Litoria aurea* (Green and Golden Bell Frog)

· *Pteropus poliocephalus* (Grey-headed Flying-fox).

Discussion – Green and Golden Bell Frog

The New M5 EIS Biodiversity Assessment (at 21.2.4) advised that the population of Green and Golden Bell frogs on the Kogarah Golf course are located within the construction and operational footprint of the WestConnex. The frogs have already been subject to relocation due to the construction of the M5 in 1988 where they were relocated to purpose built ponds (RTA ponds) with a frog underpass to Marsh St Wetlands. In their new environment they received regular human management to keep the population in a healthy environment. This is ongoing.

The Kogarah Golf Course is around 40 hectares of viable Green and Golden Bell Frog habitat including several ponds some of which are purpose built RTA ponds. The frogs although seemingly breeding in the RTA ponds are not limited to them as they move around the habitat through various corridors. In a recent 2014/2015 monitoring period, the population was estimated between 30 to 50 adults. This is down from 110 adults in 2012. The current population is unlikely to persist without constant management and considered to have poor long term viability. (p197 Biodiversity Assessment Report -17/104 PDF).

The two RTA ponds, identified by Dr White as the population centres and breeding habitat, are to be retained and buffered by an exclusion zone of about 32 metres. (p197. Biodiversity Assessment Report -17/104 PDF). The Biodiversity report also discusses other means of mitigating harm to the frogs during construction although no actions will directly impact the RTA ponds there are chances that indirect impacts such as increases in noise, light, dust and vibration (p199 Biodiversity Assessment Report -19/104 PDF).

A large portion of foraging, dispersal and sheltering habitat will be removed and replaced by constant construction dangers. The Green and Golden Bell Frog can live as long as 10 to 15 years. Overall population sizes (20 to 100) of the frogs are decreasing. Once formerly large frog populations have completely disappeared since 1960. (ANIMALS - http://animals.mom.me/long-golden-bell-frogs-live-9889.html)

The Australian Government Department of the Environment Biodiversity Species website at Profile and Threats, advised the Green and Golden Bell Frog is known to breed during late winter to early autumn, but generally during September–February with a peak around January–February after heavy rain or storms (Daly 1995; White 2001).

The EIS states that with the implementation of the Plan of Management, the longer-term viability of the population should not decrease. (p198 Biodiversity Assessment Report - 18/104 PDF). In my view to state the population should not decrease is a false statement based on a flawed ideal as there is no doubt a number of frogs will be killed over a four year period of construction.

The proposed action by WestConnex to construct roads, buildings, unfiltered emissions towers, car parks, would remove a maximum of 7.82 hectares (about 20% or the bulk) of the frog's foraging, sheltering and dispersal habitat. It is proposed to install temporary sound proof fencing adjacent the RTA ponds, transparent sound proof fence (minimise shadowing of ponds) directional lighting (24hr) to reduce light spill on ponds at night, use town water supply to decrease dust falling on RTA ponds, a non-acoustic shed (dumping/loading spoil) to aid noise reduction. The bulk of the impacts are said to be temporary (up to four years) with the proposal to rehabilitate the temporary works impact area following completion of the action.

The WestConnex recognise the severe direct impacts to Green and Golden Bell Frog (p71 Biodiversity Assessment Report - 89/197 PDF) which they state may include:

· Mortality to individuals during clearance of sheltering habitat

· Mortality and injury to individuals during decommissioning of dam/pond within the golf course

· Mortality or injury to individuals during construction of mitigation measures (e.g. frog exclusion fencing)

· Mortality or injury to individuals during operation of the permanent facilities at the Arncliffe surface works area

· Decrease the habitat values of the RTA ponds due to shading, dust, noise and light and potentially accidental water contamination.

During construction works at the Arncliffe surface works area, there is a possibility that Green and Golden Bell Frogs may be injured. Remember these are small creatures that may not survive an injury. A pre-clearing procedure would be established to ensure that the area is free of frogs prior to any habitat removal. An unexpected discovery procedure would also be implemented to ensure that even if frogs remain in areas to be cleared, that there is a clear and robust method to minimise the potential for frogs to be injured or killed (p77 Biodiversity Assessment Report - 95/197 PDF).

Appendix D Flora Species Record (Page 16 (82/104 PDF)) **Table 1: Construction mitigation and management measures within the construction zone** Site inductions should contain a relevant section on the Green and Golden Bell Frog. The induction should incorporate:

- What to do in the event of unexpected finds of frogs within the construction zone.
- Highlighting the enhanced frog habitat area and why this is a 'no-go' zone.

Given that there will be high frequency of new personnel rotating through the site over the four year period there is no mention of how frequent new workers will receive an

induction. There is no mention of highly visible warning signage/including pictures (particularly at night when frogs are more active). Strict speed limits within the footprint should be enforced (app. 8 kph). It is also imperative guidelines for the frogs are strictly adhered to. The only way to monitor the integrity of the frog procedures is to have independent observers present 24/7 x 4 + years.

The M5 EIS Biodiversity Assessment Report in Appendix S at Appendix A charts Anticipated Find Procedure. These measures although seemingly going some way to help save wayward frogs are not sufficiently clear. For example if a frog is observed stop work, immediately and notify supervisor and do not start work until cleared by an environmental representative. It must be made clear that no work can recommence and it means no vehicles or workers can move through the area at all even if it's a shift change over. I doubt these procedures will be followed every time a frog is sighted jumping in the dirt.

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Frog procedures must be posted everywhere around the site and at site office/s doors so workers have no doubt that stopping work is the correct thing to do. Despite this I anticipate there will be times when frog procedures are ignored for the sake of getting ahead.

The frogs will endure at least four years of loss of habitat and breeding disruption. Then it will take a number of years for a replacement habitat to become sustainable for a species return (if at all). It would rely on a mix of taller trees and shrubs for shade and temperature control, continuance of grasses for moist corridors, introduction of their food sources to encourage them, more pond options and security of environment.

The interruption to the frog's movement corridors, habitat feeding areas the breeding cycle will be disrupted over the four year period further reducing their numbers to critical levels. I doubt the frog management procedures will be genuinely sustained over a four year period and then many more years after the Cooks Cove project is commenced and completed.

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In the end the WestConnex failed the Ibis. There was no independent review before the contracts were awarded and the M4 widening rushed forward. The WestConnex seriously downplayed the importance of the Ibis in their habitat. As such I believe the WestConnex have failed and will continue to fail the Green and Golden Bell Frogs (due to no independent review and no independent observers.)

It is very clear at 21-8 (21- Biodiversity) that there is a significant loss of water habitat and environs. Also with the Cooks Cove development the extra people and pollutants introduced into this area will see the demise of the frog (*The Biodiversity Assessment Report at page 15 (33/197 PDF) is a reference to Green and Golden Bell Frog Management Plan for Cooks Cove – Cumberland Ecology 2006.)*

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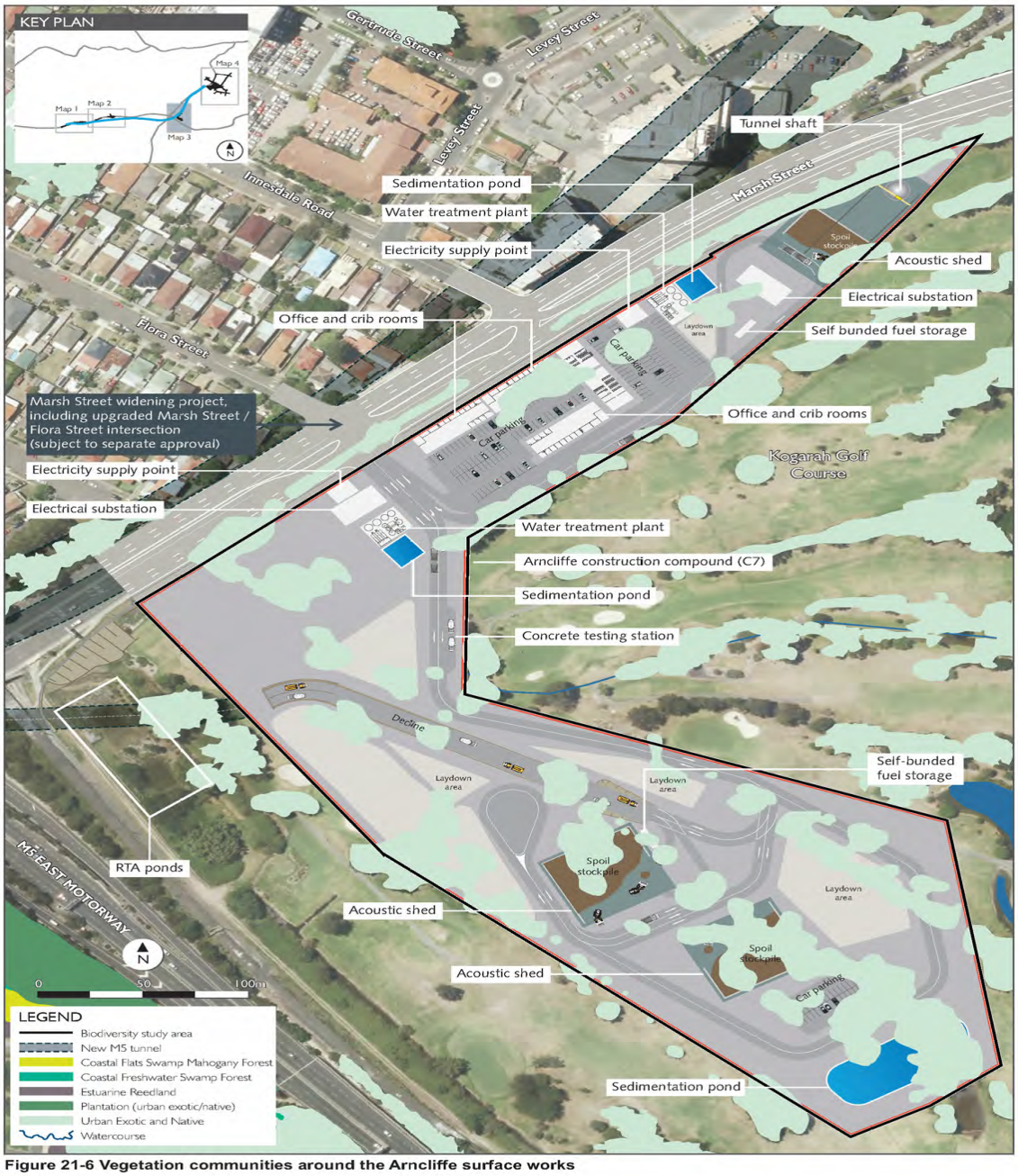


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shown.



Figure 5-40 Arncliffe motorway operations complex (MOC 3)

(figure 5-40 pdf page 40/40 - M5 Motorway Operations Complex at Kogarah Golf Course: - including unfiltered ventilation stacks near RTA ponds -EIS local road 'upgrades')

After work is completed the structure above, a Motorway Operations Complex, ventilation and other buildings will be present. It is not stated when the frog habitat remediation will be completed, likely sometime after the buildings above are completed. However if the picture above is anything to go by, the remediation will look remarkably like the golf course as it currently is.

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> The current population is unlikely to persist without constant management and is considered to have poor long-term viability (Dr Arthur White pers. comm 2015). The population is now small (less than 50 adult frogs; Dr Arthur White pers. comm 2015) and is limited by the presence of Plague Minnow and chytrid fungus in ponds other than the RTA ponds. Since 2003, breeding has occurred in the RTA ponds in every year except 2014.

This is the reasoning towards another frog pond location introduced in Other Measures - at *page 88 - 4.4.3 Habitat creation at Marsh St and the establishment of a captive breeding population*

> *New Green and Golden Bell Frog habitat comprising at least three new ponds will be created and managed in perpetuity for the species on Roads and Maritime land at Marsh Street. See Figure 2. (below)*



Habitat Creation

Not only does the EIS anticipate a number of frogs will be killed during construction, it's likely they could be relocated to an area adjacent to Eve St (within yellow lines above). This location is right next to a busy multi lane road which at some point in the future could also be widened at the whim of the government. The frogs will never survive with this continuous adverse interference.

The proposed pond locations marked in yellow lines is a predominantly grassed dry sloping ground currently not suitable for the wetland frog habit. It would take years to construct and test before it was deemed suitable for the frogs and there is no guarantee the area will be viable or safe from human interference (i.e. vandals). It is just ridiculous that the frogs will be removed from a perfectly suited constant wetland habitat (naturally water fed) to a dry higher location without cover of trees which provide not only protection from predators but tall trees provide temperature control and on a hot day in a young landscape these frogs will suffer. There is no doubt this will adversely impact the survival of the population and I fear will cause their demise.



(Photo [redacted] n 12/12/2015 – Off Eve St looking towards Marsh St)

In the above photo the land is gently sloped downwards from left to right. In the background a stand of medium sized trees and thick low bush which would provide suitable cool air and cover for the frogs if in fact they adopted it as part of their habitat range. The benefit is that these trees are mature. But the rest is in unsuitable open ground. Being next to a road (albeit a high fence is present) the frogs will be proximate to pollution runoff and toxic pollution created by an unfiltered (M5) exhaust stack nearby on the golf course. There is no frog security at Eve St, feral animals, trespassers, vandals. The golf course was a reasonably secure habitat because its membership limited human access.

Conclusion

Our governments cannot continue to pave the way for the destruction of Australia's unique environment (flora and fauna) degrading human health, destroying Sydney's heritage.

If the WestConnex project business case ever became transparent (to be independently assessed) it would show a devastating waste of our taxes for a road that will destroy so much when there are more effective ways to move people than always building roads.

The history of the WestConnex management of protected and threatened species is abysmal as shown by the destruction of Ibis on the M4. The New M5 proposes destruction of the critically endangered Cooks River Forest (or CRCIF) and other significantly important entities (Green and Golden Bell Frog) which will be lost forever in their locations.

In a critical time where all efforts should be made to protect what we have for perpetuity, the NSW Liberal Government has acted bullishly to push through unprecedented irresponsible actions that will devastate Australia's natural and heritage environment and human health.

In light of the serious flaws, lack of transparency and damaging outcome I ask the Secretary of NSW Planning and Environment not to approve the destruction of this precious frog habitat and to not permit the WestConnex to go ahead as there has been no thorough independent, transparent and public review/audit.

Regards

[redacted]

[redacted]

Content:
Please see attached.
Green and Golden Bell Frog
The WestConnex have advised that they expect number? of Green and Golden Bell to be killed when the RMS uses the majority of their habitat as a construction zone which includes a car park and beds. This is unjustifiable waste of the space that should be left to the frog's habitat. Shame on our government once again.

Not one frog should be injured or killed for the sake of a road that is not even necessary.

[redacted]

NSW Department of Planning **and Environment**

This specific Submission is on M5 WestConnex EIS – Biodiversity – Green and Golden Bell Frogs of the Kogarah Golf Course.

I lodge a strong objection to the destruction of the Green and Golden Bell Frog and to the entire WestConnex.

Introduction

The WestConnex plan to widen Marsh St as part of its overall aim to expand the M5 roadway destroying a critical section of Frog habitat at the Kogarah Golf Course which it says can't be avoided. The WestConnex frog management plan is not adequate for their protection. That and the extensive period of destructive action/s by the WestConnex of more than four years (after including an unfiltered emissions stack) at this location will severely impact the Green and Golden Bell Frog potentially eradicating the sensitive species from this site and area.

For a project of this size, the biggest in the world, it lacks transparency and independent review. There are far too many contentious and damaging outcomes which do not value add to the project going ahead or to the city when it's finished. As such it should not proceed. However the NSW Government has rushed ahead without forethought or care to the consequences of a project that will destroy so much of what we value and will be a huge waste of public money.

Items of Significance – M5 impacts to critical environments

The M5 WestConnex EIS at page 12 of the M5 - Biodiversity Assessment Report identified the Green and Golden Bell frog amongst the three items of high significance which had been assessed for potential impacts from the project as follows:

Endangered Ecological Communities are:

· Cooks River / Castlereagh Ironbark Forest of the Sydney Basin Bioregion.

Threatened Fauna

· *Litoria aurea* (Green and Golden Bell Frog)

· *Pteropus poliocephalus* (Grey-headed Flying-fox).

Discussion – Green and Golden Bell Frog

The New M5 EIS Biodiversity Assessment (at 21.2.4) advised that the population of Green and Golden Bell frogs on the Kogarah Golf course are located within the construction and operational footprint of the WestConnex. The frogs have already been subject to relocation due to the construction of the M5 in 1988 where they were relocated to purpose built ponds (RTA ponds) with a frog underpass to Marsh St Wetlands. In their new environment they received regular human management to keep the population in a healthy environment. This is ongoing.

The Kogarah Golf Course is around 40 hectares of viable Green and Golden Bell Frog habitat including several ponds some of which are purpose built RTA ponds. The frogs although seemingly breeding in the RTA ponds are not limited to them as they move around the habitat through various corridors. In a recent 2014/2015 monitoring period, the population was estimated between 30 to 50 adults. This is down from 110 adults in 2012. The current population is unlikely to persist without constant management and considered to have poor long term viability. (p197 Biodiversity Assessment Report -17/104 PDF).

The two RTA ponds, identified by Dr White as the population centres and breeding habitat, are to be retained and buffered by an exclusion zone of about 32 metres. (p197. Biodiversity Assessment Report -17/104 PDF). The Biodiversity report also discusses other means of mitigating harm to the frogs during construction although no actions will directly impact the RTA ponds there are chances that indirect impacts such as increases in noise, light, dust and vibration (p199 Biodiversity Assessment Report -19/104 PDF).

A large portion of foraging, dispersal and sheltering habitat will be removed and replaced by constant construction dangers. The Green and Golden Bell Frog can live as long as 10 to 15 years. Overall population sizes (20 to 100) of the frogs are decreasing. Once formerly large frog populations have completely disappeared since 1960. (ANIMALS - http://animals.mom.me/long-golden-bell-frogs-live-9889.html)

The Australian Government Department of the Environment Biodiversity Species website at Profile and Threats, advised the Green and Golden Bell Frog is known to breed during late winter to early autumn, but generally during September–February with a peak around January–February after heavy rain or storms (Daly 1995; White 2001).

The EIS states that with the implementation of the Plan of Management, the longer-term viability of the population should not decrease. (p198 Biodiversity Assessment Report - 18/104 PDF). In my view to state the population should not decrease is a false statement based on a flawed ideal as there is no doubt a number of frogs will be killed over a four year period of construction.

The proposed action by WestConnex to construct roads, buildings, unfiltered emissions towers, car parks, would remove a maximum of 7.82 hectares (about 20% or the bulk) of the frog's foraging, sheltering and dispersal habitat. It is proposed to install temporary sound proof fencing adjacent the RTA ponds, transparent sound proof fence (minimise shadowing of ponds) directional lighting (24hr) to reduce light spill on ponds at night, use town water supply to decrease dust falling on RTA ponds, a non-acoustic shed (dumping/loading spoil) to aid noise reduction. The bulk of the impacts are said to be temporary (up to four years) with the proposal to rehabilitate the temporary works impact area following completion of the action.

The WestConnex recognise the severe direct impacts to Green and Golden Bell Frog (p71 Biodiversity Assessment Report - 89/197 PDF) which they state may include:

· Mortality to individuals during clearance of sheltering habitat

· Mortality and injury to individuals during decommissioning of dam/pond within the golf course

· Mortality or injury to individuals during construction of mitigation measures (e.g. frog exclusion fencing)

· Mortality or injury to individuals during operation of the permanent facilities at the Arncliffe surface works area

· Decrease the habitat values of the RTA ponds due to shading, dust, noise and light and potentially accidental water contamination.

During construction works at the Arncliffe surface works area, there is a possibility that Green and Golden Bell Frogs may be injured. Remember these are small creatures that may not survive an injury. A pre-clearing procedure would be established to ensure that the area is free of frogs prior to any habitat removal. An unexpected discovery procedure would also be implemented to ensure that even if frogs remain in areas to be cleared, that there is a clear and robust method to minimise the potential for frogs to be injured or killed (p77 Biodiversity Assessment Report - 95/197 PDF).

Appendix D Flora Species Record (Page 16 (82/104 PDF)) **Table 1: Construction mitigation and management measures within the construction zone** Site inductions should contain a relevant section on the Green and Golden Bell Frog. The induction should incorporate:

- What to do in the event of unexpected finds of frogs within the construction zone.
- Highlighting the enhanced frog habitat area and why this is a 'no-go' zone.

Given that there will be high frequency of new personnel rotating through the site over the four year period there is no mention of how frequent new workers will receive an

induction. There is no mention of highly visible warning signage/including pictures (particularly at night when frogs are more active). Strict speed limits within the footprint should be enforced (app. 8 kph). It is also imperative guidelines for the frogs are strictly adhered to. The only way to monitor the integrity of the frog procedures is to have independent observers present 24/7 x 4 + years.

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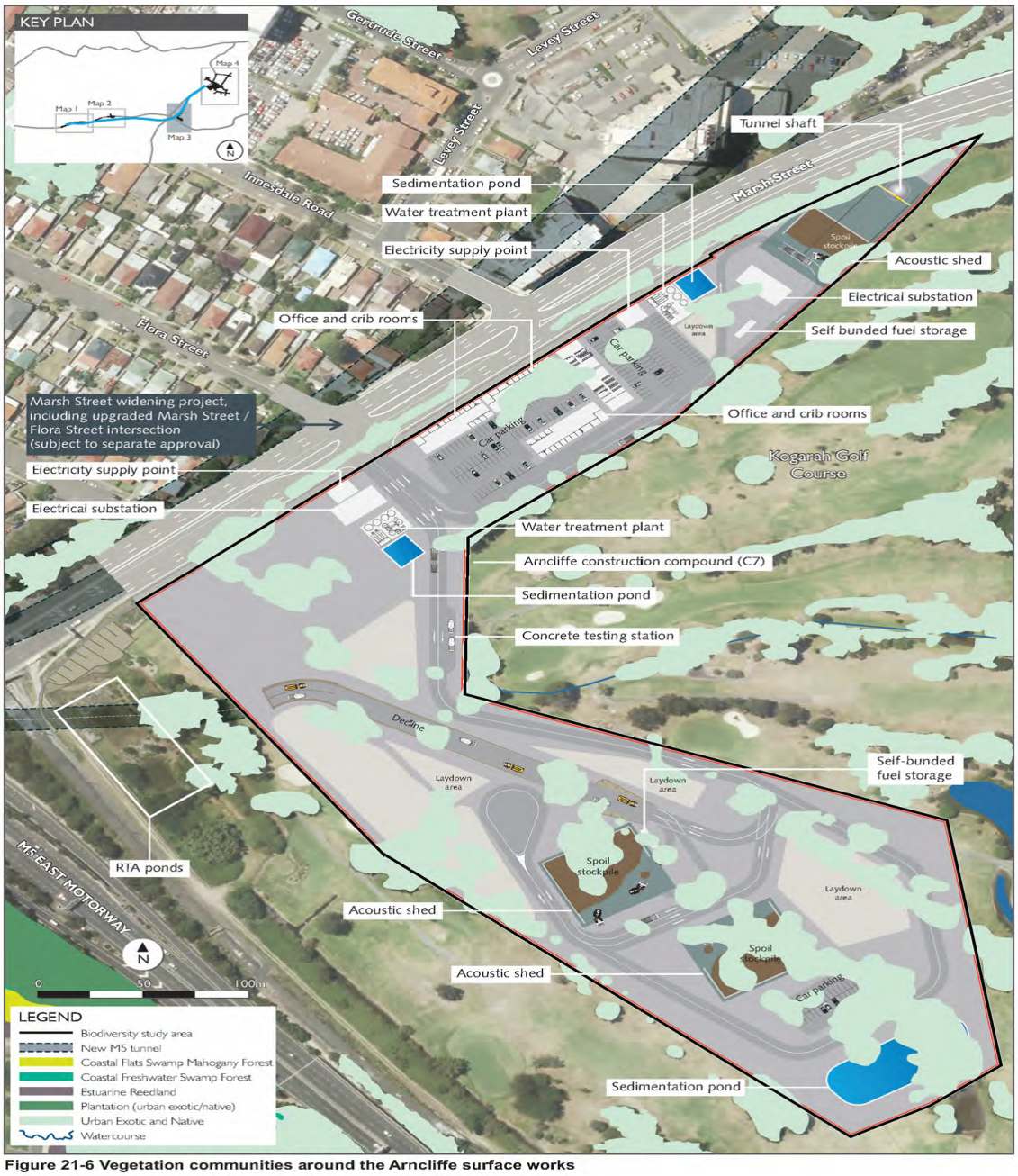


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Regards

[redacted]

[redacted]

Content:
People are losing their homes so the government can build a road. It is criminal bullying behaviour that these people are not being compensated so they can easily move into a home in the same suburb immediately. Shame on the government for not having the guts to step in and do something about this.

Just another reason not to support this illegal project - The Wetsconnex



[redacted]

Name: ronald rayner

Organisation: r.w.p.s. (president)

Govt. Agency: No

[redacted]

Address:

[redacted]

rockdale, NSW

2216

Content:

Sharp-tailed sandpiper Curlew sandpiper Black-winged Stilt ￼ ￼ ￼

ROCKDALE WETLANDS PRESERVATION SOCIETY

[redacted] ROCKDALE 2216

ROCKDAle

[redacted]

Dear Sir or Madam

Will WestConnex deliver on its promises

On current available information it seems unlikely.

It will simply move traffic congestion around. It is still not clear what will happen to traffic 'dumped' at St Peters- how will it get across to the airport and Port Botany, or Southern Cross Drive.

It appears the business model is such that less traffic will use the M5East- with consequently more traffic on local roads.

If there are no advantages to the road as a road, then there can be no justification for the environmental impacts which include loss of important habitat for species including Green and Golden bell frog through the use , for a period of years, of Kogarah Golf Course as a work site loss of an area, including significant trees, in Sydney Park potential disturbance to parts of the Rockdale wetlands corridor (given the uncertainties over the route and construction details, the actual extant of damage cannot be properly assessed at present.

The process by which information trickles out, and where it is impossible to find out details through freedom of information avenues (GIPA) , is to be condemned - in terms of providing a logical planning regime and employing meaningful public consultation NSW has gone back decades.

yours faithfully

ronald rayner

president



[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: WestCONnex Action Group Company
Organisation: WestCONnex Action Group (Member)
Govt. Agency: No
[redacted]

Address:
[redacted]

St Peters, NSW
2044

Content:
Please find attached WestCONnex Action Group's submission to this EIS (200 page PDF). Our objections are detailed in this attachment. If you do not receive it, please email us immediately.

[redacted]

[redacted]

[redacted]

[redacted]



Attn: Secretary
NSW Department of Planning & Environment

Friday 29 January 2016

Submission to EIS for project SSI 14_6788 WestConnex New M5

This document contains the formal submission made by WestCONnex Action Group Incorporated (WAG) to the WestConnex New M5 environmental impact statement (EIS).

WAG is a community group made up of residents from across western, inner and south-west Sydney. We are not affiliated with any political party.

WAG strongly objects to the New M5 project based on the information contained in this EIS, and to the WestConnex proposal as a whole. We ask the Minister for Planning to reject this proposal.

We have a huge number of objections to the project but also to the approach taken in the EIS itself. We agree with the City of Sydney that the inadequacy of the New M5 EIS is "so profound" that should not be used as a basis for a Ministerial determination to approve the project. The EIS as a whole should be rejected.

WestConnex as proposed is the wrong solution at the wrong time for Sydney. It is out of step with international best practice when it comes to transport policy and the creating liveable, economically viable cities in the 21st century.

Experience and research from independent experts here in Australia and overseas has shown that these kinds of toll road mega-projects are hugely expensive and do not ease congestion over the long term. If anything, such projects make congestion worse by increasing overall traffic volumes as the new road capacity quickly fills up. WAG has yet to hear of an independent transport expert who backs the project. Even the EISs produced for the various stages of WestConnex show it is not a long-term solution to Sydney's congestion problem.



In addition, WestConnex will divert billions of dollars of NSW and Federal taxpayer money into a tollway that only 1% of people in NSW will use. If its huge and rapidly escalating $16.8 billion cost was invested in more sustainable transport options instead - such as public transport improvements in western and south-west Sydney, better management of Sydney's existing roads, and so on - it would not only be likely to reduce congestion and improve mobility in our capital. It would also free up much-needed public funds for improving roads, public transport, schools and hospitals in regional NSW. Spending it on a tollway that so few people will use is both wasteful and deeply unfair.

The strategic justification for the New M5 is weak and inconsistent with the NSW Government's strategic planning and policy framework, despite its inclusion in the 2012 State Infrastructure Strategy and the Long Term Transport Master Plan. The project as proposed in this Environmental Impact Statement (EIS) does not deliver the broader objectives of WestConnex as stated in the Updated Strategic Business Case (November 2015).

There has been no compelling case made for why WestConnex should be built, and the project should not receive approval and not proceed. This EIS and the Updated Strategic Business Case for WestConnex are clear that the benefits accruing from Stage 2 do not outweigh the costs. Benefits are shown to come once the whole WestConnex project is built according to the Updated Strategic Business Case, and that no benefits exist until all three Stages are delivered (WestConnex Full Scheme: Economic Appraisal, KPMG, 19 November 2015). I am aware that even this has now expanded to include other tollways such as the Sydney Gateway, making it even more likely that this project will provide disbenefits to society if it proceeds as proposed in this EIS, i.e. as a standalone project. This is particularly concerning given there is a significant risk that Stage 3 will not be built.

This EIS is of a very low standard and fails to provide meaningful evaluation and assessment of the WestConnex New M5. Instead, the document reads like an advertisement for the New M5 and associated road works, rather than as a critical examination of the environmental impacts of the project. Parts of the proposed project are described only with subjective, conditional language such as "where feasible", while not providing any meaningful detail, and implying no requirement to meet objective standards. Some results are provided in context, whilst others are provided as numbers

without a context, and yet others are essentially lists of things that have not yet been surveyed or planned. As such, we contend that the project has not had a meaningful EIS conducted or published.

The EIS lacks rigour and sound analysis, despite the huge volume of documentation. This lack of rigour and analysis is consistent across all chapters and appendices. The project objectives are biased towards a motorway solution, so that any proposed alternative falls short of the proposed solution. Similarly, the work undertaken in the EIS is highly compliance driven, and fails to take into account opportunities or strategic impacts, and the assessment of cumulative impacts is almost negligent.

WestConnex is presented as a 'transformational' infrastructure project, however, the EIS is not clear on what transformation it will achieve. There is no demonstration that WestConnex delivers transformation in terms of social or economic improvement, or better land use outcomes. To the contrary, WestConnex will deliver a piece of infrastructure that increases traffic on local roads, does not enable value capture or urban renewal, and is not consistent with the government's land use priorities or the proposal in the 2012 State Infrastructure Strategy.

A larger question raised by the proposed New M5 project is what happens if capacity on this motorway is reached? The existing M5 East has proven that a new motorway can easily reach or exceed capacity within a 15 year timeframe. If that outcome is realised for the New M5, Sydney will be left with a transport legacy that cannot support the jobs growth in the west consistent with Government policy. Sydney needs to manage demand for existing road assets to maximise economically productive use and deliver sustainable transport as a real alternative to car travel. International cities such as Los Angeles are moving away from their dominant car-based culture to invest in public transport in order to build the sustainability and attractiveness of their city for residents, businesses and visitors alike.

The New M5 project has only been assessed to 2031, which does not take into account the 45 year concession period for the asset as stated in the WestConnex Updated Strategic Business Case. The assessment does not account for future events that may radically change travel demands or behaviours.

The EIS assumes that by 2031 the full WestConnex project will be complete. This includes the M4-M5 Link (Stage 3), which will have additional significant impacts on

residents and businesses. Nowhere in the EIS are these impacts considered, nor information given to the public to fully consider or understand the implications of the whole WestConnex program.

The evidence provided by the EIS in support of the project is incomplete and unbalanced, selectively including and excluding impacts from subsequent planned stages of the WestConnex project. The analysis of strategic alternatives in the EIS is cursory and fails to demonstrate the New M5 extension is the best option to meet the needs of a growing Sydney population. The EIS also does not take into consideration the travel patterns of residents and businesses in western or south-western Sydney that the New M5 is intended to serve, nor the wider impacts on inner-Sydney communities affected by the WestConnex program.

The statement that the New M5 project is an integrated transport project is false and misleading. It is a motorway that does not provide for improved public transport connections and has not fully considered the active transport component in line with government policy. The government could have delivered a better outcome by focusing on ways to “improve access” that is modally agnostic and more consistent with government’s land use policies.

We recognise there is pressure on several NSW Departments, including Planning and the Environment, to approve this project, particularly as contracts have already been signed for the New M5 ahead of such approval being granted. We remind public servants of their obligation to the public and to the potential social, health and economic costs of spending $16.8 billion on WestConnex when it provides no solution to Sydney's transport needs.

In order to make this submission, WAG has consulted with and/or reviewed evidence provided by a wide range of experts, including transport planners, environmental organisations, scientists, transport economists, local councils, medical professionals, social workers, investigative journalists, and more. Combined with our own primary research and review of the EIS, this leads us to not only strongly object to the proposal as a whole, but to raise many specific objections in regards to many areas of this EIS.

As ordinary citizens, we have had to increase our knowledge of a range of new fields including transport, social planning and biodiversity studies. What really disturbs us is that we have encountered so much serious independent and academic opinion and



research that runs counter assertions in the EIS, yet none of this is engaged with or reflected in the EIS. SImilarly we noted that in the Response to Submissions in the EIS, there was no engagement with critical analysis.

WAG asks that the Department rejects this proposal on the basis of this EIS. We expect a detailed response to each of the objections we have raised in this submission, and that you will publish this submission in accordance with the undertaking on your website.

Please send your acknowledgement of this submission and your response to our objections to us at:

WestCONnex Action Group

[redacted]

St Peters NSW 2044

[redacted]



1.0 Objection to the failure of WestConnex, including the New M5, to achieve its stated core objectives

WAG objects to both the failure of WestConnex to meet its stated core objectives and the manner in which these objectives were formulated.

The stated objectives for WestConnex were contrived to fit the project after it had already been announced. In a democratic strategic planning process, objectives are set first based on the needs and desires of the community, and then alternative projects/policies are appraised against their ability to meet those objectives.

The objectives have no associated targets by which their achievement can be ever be determined. Objectives/targets need to be specific, measurable, achievable, relevant and time-bound, and each of the project's objectives fails on one or more of these measures.

Even though the objectives have been contrived to fit the project, the project still fails to meet them, as detailed below.

Core objective	Objective Met?
Support Sydney's long-term economic growth through improved motorway access and connections linking Sydney's international gateways and south-western Sydney and places of business across the city.	**NO** The planned route for the WestConnex does not connect to Sydney Airport or Port Botany. The EIS does not provide evidence that economic growth can be assisted by increased motor traffic to the CBD. There are serious flaws in the proponent's traffic modelling.

If WestConnex leads to more traffic congestion in the inner west, parts of south-west Sydney and routes into the CBD as most independent experts and even this EIS admits it will, the project will not improve access to businesses. Congestion and traffic will only worsen, not just on the New M5 and other parts of WestConnex, but on the surrounding road network.

Should Badgery's Creek airport be built, the emphasis on Sydney Airport is likely to be misplaced, as this hub is likely to act as a more appropriate international gateway for many air freight movements given its proximity to western Sydney freight facilities, as well as western Sydney residents.

There are better ways of spending $16.8 billion that would deliver greater long-term economic growth, including:

- improved road and rail access to Port Botany
- improved public transport between Western Sydney and Sydney's various CBDs
- improving ring roads in Western Sydney
- supporting and developing businesses in Western Sydney

There is already an extensive road and motorway network linking Sydney's international gateways (Sydney Airport and Port Botany), Western Sydney and places of business across the city. The operation of this network could be improved significantly with demand management such as road pricing reform. There is no need for costly and destructive new motorways.

	The most efficient and economic way to link large trip generators is with mass transit. A single motorway lane can transport only 2000 passengers per hour, under ideal conditions. A single railway line can transport 20,000 passengers per hour.
Relieve road congestion to improve the speed, reliability and safety of travel in the M5 Motorway corridor.	**NO** The improvements in congestion claimed for the project arise from measures that can be separated from the rest of the project – namely the charging of tolls for using the M5 East and New M5. Absent congestion charging, or similar, the laws of induced traffic means that increasing road capacity increases traffic volumes; it does not reduce congestion over the long term, if at all. Charging for the M5 and New M5 without congestion charging on alternate routes will increase, not reduce, congestion on those routes. . Many intersections will remain at the lowest Level of Service (F) even if the project, including the New M5, is built. The second sentence seems to assume rather than demonstrate that this objective is met by stating that diverse travel needs are 'best met by road infrastructure.' Claims by WestConnex that the project will improve speed and reliability depend on the reliability of its approach to traffic modelling, which experts argue are flawed.

There is no evidence that increasing road capacity and building urban motorways can relieve road congestion in the long term, because the added capacity simply induces more demand.

As travel speeds increase, so do travel distances, i.e., increasing the speed of the road network encourages urban sprawl. Perversely, this sprawl has the effect of reducing the population's accessibility to employment, education and services, and increasing transport costs, because people have to travel longer distances.

Road congestion is inevitable in any large city in the absence of adequate demand management. There can never be enough road capacity to satisfy the latent demand for driving, where everyone can live as far from work as they like, and drive whenever they like, to wherever they like in free flowing traffic. It is geometrically impossible.

Congestion on Sydney's roads is the main thing keeping private vehicle travel demand in check. If this congestion is relieved temporarily by increasing the road supply, then demand will increase until limited by the resulting congestion.

A better objective would be to give as many people as possible a more pleasant and faster alternative to sitting in traffic – particularly drivers of single-occupant vehicles who make up the vast majority of peak-hour traffic.

	A claimed benefit of the project is that daily traffic on the existing M5 East would reduce by 20-40 percent due to the new tolls. If it is acknowledged that tolls alone are effective in meeting the project objective (reducing congestion), then there is no rationale for adding more capacity. More intersections in the study area will have an LOS of F with the project than without it in 2021.
Cater for the diverse travel demands along these corridors that are best met by road infrastructure	**NO** The majority of traffic movements are fungible, and highly responsive to environmental changes including: provision of alternate modes of transport, (for e.g. public transport); provision of alternate traffic generators (for e.g. increased local employment opportunities); and cost and other signals (for e.g. congestion charging). Catering more adequately for travel demands that are not 'best met by road infrastructure' also has the advantage of releasing road capacity for road users with no alternatives (within the limitations imposed by induced traffic) and potentially at a lower overall cost that proper process would have seen explored as an alternative to this project. There is already more than sufficient capacity along these corridors to cater for all the essential vehicle travel, particularly if alternative strategies such as demand management and public transport investment are implemented.



Enhance the productivity of commercial and freight generating land uses strategically located near transport infrastructure	**NO** The planned route for the WestConnex does not connect to Sydney Airport or Port Botany. This is a reference to faster travel times that should enhance the productivity and attractiveness for businesses along the WestConnex route. It also relies on traffic modelling predictions being accurate. Modelling has failed for some past projects leading to business failure. It's also not clear exactly what this is referring to and in the absence of a transparent business case, it's not possible to evaluate the 'enhanced productivity' of land uses. This objective could be more easily and more economically achieved by improving the operation of the existing road network with demand management, e.g., road pricing reform. It has to be questioned whether a highly populated inner city area is the optimal location for some commercial and freight generating land uses. Could some of it be moved to less populated areas, where the transport costs and externalities are lower? There is evidence this is already happening in places like Moorebank; this would render this objective, and much of the justification for WestConnex, moot.
Fit within the financial capacity of the State and Federal Governments, in partnership with the private sector	**NO** The EIS does not include the business case. Until the full business case is released - i.e. one in which critical information such as the cost and toll revenue figures have not been redacted - and been independently verified, it cannot be assumed that the

project fits within the financial capacity of the State and Federal Governments. It has already been made clear that the private sector will not be funding this project unless and until the toll road becomes profitable precisely because of concerns about its viability.

Billions of dollars of public money are being paid to private companies, and the public not the private sector carry the risk on this project. Such a one-sided relationship can hardly be described as a “partnership”. Currently we do know that the WestConnex will absorb billions of Federal and State funds – not to mention toll revenues from motorists – that could be spent on alternative projects with better and more sustainable returns.

There is a high risk of toll revenue from the project not meeting forecasts, resulting in financial losses for the government at state and federal level – which of course, are losses that be borne by NSW and Australian taxpayers.

The cost of the overall WestConnex project is currently blowing out at the rate of over $2 billion a year. It came with a price tag of $10 billion at its inception in 2012; it is now a muti-tollway project that comes with a $16.8 billion cost. At this rate the final cost would be double that by the time stages 1-3 of WestConnex are due for completion in 2023.

The project has a high financial risk. The flaws and optimistic assumptions in the traffic modelling mean that toll revenue is likely to be significantly lower than

	forecast. AECOM has a history of providing over-optimistic traffic forecasts for toll roads, resulting in previous financial failures (e.g., Clem7).
Optimise user-pays contributions to support funding in a way that is affordable and equitable	**NO** The proposed cost model will not be affordable for many residents, particularly when high parking and vehicle running costs are added to the equation. The tolls are likely to be even less affordable for residents from western and south-west Sydney, where the mean income is below that of residents in the inner city. . Numerous studies have shown that irrespective of income, drivers are extremely sensitive to tolls. This has been ably demonstrated by the financial failure of the last four toll roads built in Australia, including Sydney's Lane Cove Tunnel and Cross City Tunnel. More than 99% of the NSW population will not use the project each day, but they will still have to pay for it through general taxation. Many of the potential users will be from low-income households who cannot afford to live near employment centres or railway stations. They will have to pay high tolls while higher-income households have access to cheaper roads and public transport. This is hardly equitable.
Provide for integration with other WestConnex projects and the proposed Southern extension, while not significantly impacting	**NO** The project proposes significant environmental damage both during the construction period for the New M5 and the future operation of this tunnel if it is built.

on the surrounding environment in the interim period	The EIS acknowledges there are significant impacts in relation to noise, loss of housing, destruction of heritage, and destruction of or serious threats to endangered flora and fauna. Already on the M4 widening, there are issues with asbestos waste that was not properly assessed in that project's EIS, while at Beverly Hills noise walls have been stripped away from the M5 and will stay down for months longer than originally predicted by the King Georges Road Interchange upgrade EIS. It is difficult to believe such construction issues will not eventuate with the New M5 if it proceeds. There is a high risk that future stages of the WestConnex scheme will never go ahead, due to the likely financial failure of the preceding stages. The proponents are also increasingly relying on other unplanned and unfunded tollways, particularly the Sydney Gateway and southern extension, in order to make its traffic model work. There is also a high risk of these projects not proceeding.
Manage tunnel ventilation emissions to ensure local air quality meets NSW Environment Protection Authority (EPA) standards	**NO** The emissions from the exhaust stacks and tunnel portals will not be filtered. Local air quality near the project is already poor, with air toxin levels regularly exceeding standards. Even when they do not exceed standards, they still cause health problems. There is no safe level of air pollution.



	The project will result in poorer local air quality. The air quality modelling in the EIS is worthless because it is based on flawed traffic modelling.
Maintain regional air quality	**NO** Regional air quality in Sydney is already poor, with air toxin levels regularly exceeding standards. Even when they do not exceed standards, they still cause health problems. There is no safe level of air pollution. The project will result in poorer regional air quality. The air quality modelling in the EIS is unreliable because it is based on flawed traffic modelling.
Manage in-tunnel air quality to stringent air quality standards	**NO** The in-tunnel air quality will be poorer than that for surface roads. People using the tunnels on a regular basis will have a higher risk of lung cancer, asthma, heart disease and other diseases. The health of children being driven through the tunnels is a particular concern.
Minimise energy use during construction and operation	Roads are one of most energy-intensive ways of moving people and freight. Road construction is also energy-intensive. The project will encourage longer travel distances (sprawl), which will result in increased transport energy use.

	The project will encourage travellers to switch from energy-efficient public transport to energy-inefficient private vehicles. Transport energy use could be better minimised by: ● Providing for energy-efficient transport modes (public transport, walking, bicycling). ● Land use planning that places homes closer to employment and other destinations.
Manage noise impacts in accordance with the NSW Road Noise Policy and realise opportunities to reduce or mitigate noise	Traffic volumes on surface roads will increase, resulting in increased noise pollution. The noise assessment shows that hundreds of homes will experience noise above acceptable levels. In fact the real impact is likely to be far worse than the results provided in this EIS, because noise monitoring was only done for one location at Beverly Hills and one in St Peters where only 30% of results could be included. Such limited evidence provides the community with no confidence in the conclusions reached in this EIS. Independent experts have also reported that some of the tables are inaccurate in the noise report and are therefore not reliable. The noise monitoring performed in this EIS has been too limited to properly assess the massive noise that will be generated by construction and operation of this project, and the impact it will have on the hundreds of thousands of Sydney residents who would be exposed to and affected by it. It is likely that these impacts will be severe for many residents.



Provide for improvement of social and visual amenity	The project will reduce social and visual amenity. ● The concrete interchanges and pollution stacks will be visually obtrusive. ● The increased traffic volumes on surface roads will result in lower amenity (more noise pollution, more fear and intimation, increased crash risk etc.). ● The increase in petrochemical exhaust emissions from the tunnel portals, pollution stacks and surface roads will result in increased smog and reduced visibility and air quality.
Minimise impacts on natural systems including biodiversity	**NO** The project proposes significant environmental and cultural damage, rather than enhancement or protection. The project proposes the destruction of endangered and critically endangered flora and fauna, the protection of which was a condition of approval for the current M5. For the proponent to insist that these should now be destroyed because this motorway was a failure renders such environmental protections meaningless, and the process a farce. The proponents' claim that WestConnex will reduce emissions (which could be held as minimising the impact on the environment) does not hold up. No credible authority in the world today would suggest that building freeways is the solution to cutting national greenhouse emissions.

	The overall increase in VKT and increased traffic volumes on surface streets will result in poorer air quality and more noise pollution. The project will directly cause irreversible biodiversity loss, and indirectly through increased greenhouse gas emissions that will contribute to climate change and damage natural systems. The project will result in increased VKT, and therefore more contaminants (brake and clutch dust, hydrocarbon particulates etc.) being deposited on roadways and washed into waterways. The project is not a sustainable development either economically or environmentally.
Minimise impact on Aboriginal and non-Aboriginal cultural heritage	**NO** A number of heritage buildings will be destroyed if this project proceeds. Others will be left marooned, surrounded by construction compounds and then traffic.
Protect surface and groundwater sources and water quality including management of contaminated areas	**NO** The project will result in increased VKT, and therefore more contaminants (brake and clutch dust, hydrocarbon particulates etc.) being deposited on roadways and washed into waterways.
Reduce susceptibility to, and minimise impacts of, flooding	**NO**

	The project will contribute to climate change through increased greenhouse gas emissions. This will increase the risk of flooding and other extreme weather events, not just in Sydney, but worldwide. A number of roads in St Peters within the project footprint are already subject to heavy flooding. Adding even more surface roads and removing green space to do so will only worsen this.
Integrate sustainability considerations throughout the design, construction and operation of the project, including consideration of the Infrastructure Sustainability Council of Australia (ISCA) Sustainability Rating tool scorecard	**NO** The project is not a sustainable development. ● Not economically sustainable. The costs far outweigh the productivity benefits. ● Not socially sustainable. It will destroy and sever communities, and result in poorer public health, more car dependency, more transport inequity, and more social isolation. ● Not environmentally sustainable. It will result in higher greenhouse gas emissions and irreversible biodiversity loss.

Conclusion

WAG formally and strongly objects to the WestConnex project, including the New M5, on the basis that it will not even meet its contrived core objectives, and we ask that the Minister for Planning reject the WestConnex New M5 project.



2.0 Objection to the lack of transparency and proper process

WAG objects to the lack of transparency and proper process that has characterised the WestConnex project since its inception, and continues to do so with the New M5.

These flaws are all the more serious given the Federal and NSW governments have called WestConnex the largest road infrastructure project in Australia's history. For such a major piece of infrastructure it has had a relatively short period of review. It appears to have been 'fast-tracked' to bypass important evaluation steps aimed at providing assurance to government and the taxpayers that the project is the best solution.

2.1 Long delayed and heavily redacted business case

The business case for this $16.8 billion project was only released in November 2015 - three years after the project was first proposed - and only then after intense public pressure, including a parliamentary petition that gathered more than 10,000 signatures from constituents across NSW opposed to WestConnex.

Even then, the business case that was released contained so many redactions and was so lacking in any serious detail that would allow any independent experts to undertake a serious review of the projected costs and benefits of the WestConnex project.

WAG finds it difficult to believe that a compelling business case that supports the benefits being touted by its proponents would have needed to redact so much critical information - including the cost and revenue figures that form the cornerstone of any business case - particularly given the increasingly controversial nature of the WestConnex project.

"Commercial in confidence" excuses for this secrecy can hardly apply when the project is being funded almost exclusively by taxpayers. Any other project would see investors have full access to the accounts of the project before putting their money at risk. In this case, the NSW and Federal governments have placed billions of dollars of taxpayers' money at risk on the project without giving the people who provided the funds access to this data. This is unacceptable.

2.2 Lack of independent oversight



There has also been an almost complete lack of independent oversight of the WestConnex project as a whole. Recent moves to dissolve the WestConnex Delivery Authority (WDA) and move its functions into the private corporation Sydney Motorway Corporation seem designed to make the planning processes even less transparent.

It is also disturbing that this merger follows reports of internal problems with the governance of WestConnex, including issues behind the move is conflict over the control of the planning processes. It is also unacceptable that public money has been used to establish a private company, with two ministerial shareholders, so that the corporation does not have to be publically accountable.

2.3 Grossly inadequate timeframe for community submissions to this EIS

Other projects that were less complex and impactful than the New M5 EIS were allocated considerably more time to the EIS process than the time given to the New M5 project, particularly when this EIS was only open for submissions over the Christmas and summer holiday period.

The fact that the timeframe granted to this project is longer than the statutory 30-day requirement is irrelevant given the size, scope, and socio-economic cost of this project.

This is inadequate time for submissions and findings of EIS to be considered, summarised and incorporated. Even with our network of experts and actively involved individuals, WAG found it difficult to compile this response in the allotted time. We cannot believe that ordinary residents, especially those compiling submissions on their own, would have been able to manage this process effectively in the time allowed.

We also know that the Department of Planning & Environment was well aware of the depth community anger at the short period of time given for public review and submissions. WAG's campaigns for the M4 East submission period saw hundreds of people jam the phone lines at the Minister's office on two separate occasions, and triggered hundreds of emails sent to the Minister for Planning, Rob Stokes, all to ask for an extension to 90 days for all WestConnex EIS submissions. Many people did not even receive an acknowledgement of, let alone reply to their requests.



The Minister was told repeatedly a 55-day submission period was not enough time for the community to absorb and respond to this project's massive EIS. Despite this, he failed to grant an extension. He has stated that he acts on the advice of his Department in such matters. Members of the public who contacted the Department during this period were repeatedly told the matter of an extension was still under consideration. Ultimately, the requests were declined.

The failure to grant such an extension in the basis of such an obvious need, and to release this EIS at a time when many affected residents, businesses, government departments and local councils are away, can only be interpreted as an attempt to maintain the lack of transparency surrounding WestConnex, as well as an effort to avoid proper process by circumventing community input.

This time frame is grossly inadequate for a document of this length, and the size and complexity of the task involved in reviewing in excess of 7,000 pages. This period includes many public holidays, together with a long shutdown period for administrators of the WestConnex project, adding further difficulties within an already short time period.

WAG's members and other members of the community have reported delays in obtaining additional information from the project proponents, in part because the USBs made available did not contain the complete EIS (in particular the Appendices), in part as we have had to wait for a response while the WestConnex office was shut over the Christmas break, and in part because of inefficiencies in making the additional information available.

We are disturbed that such a fundamental task such as supplying the correct information could not be accomplished by Westconnex. We have been reliably informed that residents seeking information were given the wrong USBs without the appendices. Because the app

We object to the inadequate community information process involved regarding the EIS for the New M5.

2.4 Breach of WCAG 2.0 publication standards and Disability Discrimination Act

The EIS is published in an inaccessible form with little care taken to guide the public in accessing it. For example, the chapters are not labelled in any clear way.

By publishing the EIS in PDF format, the Department has also ignored the requirement to publish an alternative to PDFs, preferably in HTML. These alternatives are required to be published at the same time and not merely be available upon request.

This requirement is imposed on all documents published by government departments to make information accessible to the visually impaired, as well as people with other disabilities that make it difficult for them to access PDFs.

The Department's failure to provide these submissions in an alternative format is clearly a breach of the government's own standards. All Australian, state and territory government websites are expected conform to Web Content Accessibility Guidelines (WCAG) 2.0 AA standards. It also places the Department in potential breach of the NSW Anti-Discrimination Act as well as the federal Disability Discrimination Act.

2.5 Issues with the response to the M4 East submissions

Having put a lot of trouble into preparing a submission for the M4 East process, WAG was disappointed that we did not receive a notification of receipt and ID number of our submission or any information about how we find out how WestConnex responded to our submissions. We were even more disturbed to discover that the M4 East Response to Submissions report states that people were sent notifications. We have contacted many of our members who have informed us that they did not receive notifications either. This has left us wondering about who provided this sentence in the report and why it is wrong. Can we expect the same dismissive arrogance during the New M5 process?



We also noticed that some important points in our submission did not receive responses at all. This seems to be a failure of process. We understand that the volume of responses was unusual and made processing difficult. But if the Department of Planning expects the community to respond in short timeframes (in this case over the Christmas and summer holidays), the Department should surely be able to deal with the process in a professional and efficient manner.

We are aware that investigative journalist Professor Wendy Bacon has submitted a detailed complaint about the issues with this response to submissions process, which she has published on her blog.

Among the anomalies identified by Prof Bacon were:

- Failures in the publication process
    - Delays in publishing the agency and public submissions
    - Dumping submissions in 61 PDFS in breach of the Department's own undertaking to provide the public with access to names, suburb and content of each submitter
    - Members of the public being misled into thinking that their submissions would be published clearly and transparently.
- Inequitable treatment of submissions
    - No way of identifying submissions initially
    - No notification of when the list of submitters was finally published following public complaints which identified submissions with numbers, and was still incomplete
    - No explanation has been provided for the change in practice and why this standard of publication was far lower than the one offered for the two projects mentioned above
- Failure to publish all submissions

- Publication of unreadable submissions
- Failure to follow the Department's own Privacy Policy
- Failure to publish organisation names of at least one community organisation who submitted to the planning process
- Breach of WCAG 2.0 publication standards and Disability Discrimination Act by publishing submissions in PDF, in contrast with standards adopted for other projects including NorthConnex
- Updating of Response report in response to complaints without any clear notification to public
- False statements about letters having been sent to submitters
- Redactions made to submissions before being sent to the proponent for response
- Apparent failure to submit a complete set of submissions to the proponent or to have processed them systematically
- Publication of false statements to the public about the steps taken by the Department of Planning and Environment to process submissions and its dealings with the community

WAG shares Prof Bacon's concerns that the unfair and unsatisfactory procedures may be adopted in the New M5 project process as well as the M4 East process. At the time of writing, WAG is not aware of Prof Bacon having received any satisfactory response to her letter, which we find extremely disturbing given the serious nature of her complaints. It suggests that the same issues will occur with the submissions process for the New M5, particularly as this project deadline has now passed without any resolution.



2.6 Lack of transparency around WestConnex contracts

Very little information about NSW government contracts for this project is available to the public.

Notices for contracts worth more than $150,000 are published on the NSW Government eTendering website, but are removed soon after a contracts expires. This is in stark contrast to the Federal register, where historic contracts remain available. The NSW system makes it more difficult for the public to track the development process in NSW.

Since responsibility for the project switched to the SMC, this process has become even less transparent. The company refuses to release contract details and refuses to respond to freedom of information (GIPA) requests.

2.7 Failure to consider cumulative negative impacts

While cumulative benefits in travel-time savings and productivity are claimed for the whole 33km WestConnex project – and even, at times, for additional projects that are unplanned and unfunded, such as the Sydney Gateway and southern extension / Souther Connector – cumulative negative effects are almost completely overlooked in the entire EIS.

Negative impacts are restricted to the EIS New M5 project footprint, which is very narrowly defined. They are not extended to include impacts on nearby local government areas; the combined impacts of the full WestConnex on factors such as traffic congestion, pollution, health, and environmental and community destruction; and so on.

If cumulative negative aspects were considered, the opportunity cost of not spending $16.8 billion on a more efficient transportation system (or any public asset) could be evaluated. If the benefits are considered for the whole project at a NSW scale, so too should the negative aspects. The failure to include such analysis in this EIS has the effect of hiding the true impact of both the New M5 and the full motorway, andit contributing further to the lack of transparency surrounding this project.

We particularly note that this EIS does not take account of the greenhouse gas emissions of the whole project, should indeed it ever be constructed.

2.8 External criticism

WestConnex's lack of transparency and proper process have also come in for sharp criticism from a number of credible independent sources.

2.8.1 NSW Auditor General's Performance Audit

NSW Auditor General's Performance Audit of WestConnex conducted in 2014 highlighted the importance of proper evaluation and identified some serious deficiencies in the development of the WestConnex project.

The Executive Summary of this audit concluded:

"In the period covered by this audit, the processes applied to WestConnex to provide independent assurance to Government did not meet best practice standards…

"The preliminary business case submitted for Gateway review had many deficiencies and fell well short of the standard required for such a document. Further, on our analysis, the business case put to the Government still included some deficiencies that independent Gateway reviews and external assurance arrangements, if they had occurred, should have identified…

"The post-business case governance arrangements did not clearly separate board-level responsibilities for commissioning from responsibilities for delivering the WestConnex project. After not separating the roles, they also failed to provide mechanisms to effectively manage the conflict between these roles.

"The WestConnex project offers several lessons. While good internal controls are critical, they are not a substitute for externally managed Gateway reviews. Steering

committees and boards cannot be responsible for both project delivery and independent assurance and reporting to the Government. Responsibility for commissioning should be clearly differentiated from the responsibility for project delivery. Challenging deadlines heighten the need for good assurance but, paradoxically, also the risk of departure from best practice." (p.3-4)

"The Government approved a new Major Projects Assurance Framework in December 2011…

"The objective of the Framework is to increase the Government's confidence and assurance in planning and implementation of major projects through their entire lifecycle, specifically:

- *prevent projects failing or not realising their stated objectives/benefits*
- *improve clarity in the feasibility phase of projects*
- *drive better governance*
- *inform Cabinet Infrastructure Committee intervention*

"A key component of the Major Projects Assurance Framework is the Gateway review system. The Gateway system is a series of structured reviews at key decision points

(gates) in a project's lifecycle. Gateway gives the Government a level of independent assurance on: □

· *whether an investment in a project is warranted □*

· *the strategic options considered*

· *the agency's capacity to manage and deliver the project on time, on budget and achieve desired project outcomes □*

· *whether a project is on track and ready to move to the next phase."(p.10-11)*

WAG agrees with this assessment and it forms part of our objection to the New M5 and WestConnex as a whole. Failure to abide by the Major Projects Assurance Framework and employ best practice governance from project inception has greatly reduced community confidence in the WestConnex project. In the case of the New M5 EIS, the community is being asked to comment on an EIS that is deficient in analysis of project justification.

A project of this size and impact should adhere to the NSW Government's Major Projects Assurance Framework. Vital gateway reviews should have been undertaken before the preparation of the EIS (and certainly before awarding construction contracts) should be commissioned, completed and made publicly available before any further approvals are issued.

The NSW Auditor-General also called the assessment of the WestConnex project concept into serious question. The following quotes are taken directly from its Audit:

"Based on the Major Projects Assurance Framework, we expected a Gateway review (or similar arm's length, independent review) either during the concept phase or early in the development of the business case.

"The Major Projects Assurance Framework introduced a Gate Zero to provide assurance that projects are well justified after considering a wide range of options. A Gateway review or similar should therefore be conducted early in a project's life cycle to provide assurance around whether:

• the need for a project is properly defined □

• there is justification for addressing that need □

• the best value means of servicing that need are being proposed after considering a broad range of alternatives and their associated costs and benefits. □

"We also expected that Infrastructure NSW or some other body would have recognised the need for a Gateway review during the concept phase, or early in the development of the business case and taken steps to ensure this occurred, including reporting to the Cabinet Infrastructure Committee.

"There was no independent Gateway review or equivalent undertaken at the concept stage. Infrastructure NSW has indicated that the concept paper it prepared to advise Government before WestConnex was publicly announced was not subjected to any

independent assurance reviews. The first gateway review was of the preliminary business case late in the business case development phase..

"We saw no evidence that:

• the Government specifically exempted WestConnex from the Major Projects Assurance Framework Gate Zero □

• provided an explanation or justification for the variation from the Major Projects Assurance Framework □

• the alternative approach adopted was assessed as being equivalent to, or better than, the Major Projects Assurance Framework. □

"…we believe that a Gate Zero Gateway review should have been conducted. It would have provided independent assurance that the project was justified…

"Infrastructure NSW's roles at this stage of the WestConnex project were in conflict. It was responsible for developing the WestConnex concept and at the same time it was the key agency responsible for providing assurance to Government over major capital projects including WestConnex. A fundamental principle is separation between those providing independent assurance and those developing and delivering a project." (p. 16-17)



WAG agrees with this assessment and it forms part of our objection to the New M5 and WestConnex as a whole.

The development of the WestConnex business case was also criticised in the NSW Auditor-General's audit. The following quotes are taken directly from its report:

"Given no Gate Zero Gateway review was conducted during the concept phase, we expected one (or an equivalent arm's length, independent expert review) at the beginning of this phase.

"In line with the Transport for NSW Investment and Gating System we also expected to see the following Gateway reviews (or equivalent arm's length, independent expert reviews)

• *a strategic business case review (Gate One)* ▫

• *a preliminary business case review (Gate Two)* ▫

• *a final business case review (Gate Three).* ▫

"We expected there would be acquittals of each of these reviews, and that the review reports and acquittals would be provided formally to Infrastructure NSW and followed up

in each subsequent Gateway review or equivalent. We also expected regular progress reports to, and monitoring by, Infrastructure NSW." (p.21)

"We expected to see outputs from the other peer reviewers but detailed reports were limited to infrastructure solutions, capital costs and traffic analysis. Even here, timing was a concern. The peer reviewer engaged to review the traffic analysis produced a report, but not until November 2013 after the business case went to the Government. The reviewer's report indicated that the review was supposed to be continuous throughout the process of modelling, but the traffic modellers were too pressed for time to consult on a continuous basis with the peer reviewer. The reviewer described the exercise as more an audit than a peer review. The reviewer concluded that the traffic data he received in early August 2013 'raises questions about the underlying quality of the modelling'.

"The agencies concerned advised us that significant analysis and review of traffic numbers was undertaken by the specialist work streams established within the Project Office. However, we have seen no evidence of an independent, arm's length review of the traffic analysis used for the final business case, by someone technically qualified to do so, before the business case was presented to the Government.

"We did not find peer review outputs for land use, urban planning or transport planning."(p.26)

WAG agrees with this assessment and it forms part of our objection to the New M5 and WestConnex as a whole.

As well as criticising the process by which the WestConnex business case was developed, the NSW Auditor General also criticised the lack of information provided

about the project in the single independent review undertaken of the WestConnex business case. From its audit report:

"One formal, independent Gateway review was conducted during the development of the business case. This was of a preliminary business case.

"In its report to the Sydney Motorways Project Office (dated 14 June 2013), the Gateway Review Panel concluded that: 'due to lack of key information presented for the review, the Gateway Review Panel was not able to form a view on whether the project is a worthwhile and prudent investment (both economically and financially viable) for the NSW Government'.

"Further, the Gateway Review Panel stated that:

"A number of key documents were delivered later than anticipated and the Review Panel had very limited time to review the Silver business case.

"Relevant documentation relating to a number of critical areas of the business case was not available for review – these included the Governance Section, Financial Plan and Communications Plan. The absence of these documents did impact on the ability to review related sections.

"The Review Panel did not have access to a number of Stakeholders or documents that were considered essential in order to satisfactorily complete the review.



"The Review Panel noted that not all key benefits nor all key risks were adequately documented, and that the business case would benefit from these and other inclusions". (p.28)

"The Gateway Review Panel also found the preliminary business case should have been more advanced than it was and would have benefited from previous iterations and review processes which had not occurred.

"The Gateway Review Panel's 'traffic light' risk ratings against the Gateway criteria were all red and yellow, with no greens."

WAG agrees with this assessment and it forms part of our objection to the New M5 and WestConnex as a whole.

According to the NSW Auditor General, a full Gateway review may have identified a number of key matters with the business case:

"We reviewed the final business case and identified some issues with the underlying analysis which we believe a full Gateway review should have identified.

"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." (p.31)

WAG agrees with this assessment and it forms part of our objection to the New M5 and WestConnex as a whole.

The NSW Auditor General's audit also raised serious criticisms about the lack of independent reviews of the WestConnex business case:

"Roads and Maritime Services say that the assurance provided to the Government on the WestConnex business case was appropriate for its purpose.

"It says the overall objective outlined in the Business Case Implementation Plan was to "produce a business case that demonstrates the overall technical and financial viability of the WestConnex scheme, consistent with the State's Fiscal Strategy". ▫

"Roads and Maritime Services advised that at the conclusion of the business case in July 2013, Stage 1 was regarded as being sufficiently developed to proceed to procurement and environmental planning phases. For the other stages, the business case outlined a pathway for their further development and planning. It says that it was always envisaged that there would be additional Gateway reviews conducted on the component parts of the scheme. ▫

"Roads and Maritime Services' arguments do not justify the lower level of independent assurance provided on WestConnex than that offered by the Major Projects Assurance Framework. The objective was to "produce a business case that demonstrates the overall technical and financial viability of the WestConnex scheme, consistent with the State's Fiscal Strategy." Approval of the business case was the key decision point so far

for this project, and arguably the stage at which independent assurance was most critical."(p.31)

WAG agrees with this assessment and it forms part of our objection to the New M5 and WestConnex as a whole.

2.6.2 Productivity Commission

It is also clear that the WestConnex project has failed to meet industry best practice in project selection and transparency. The Productivity Commission in its recent inquiry into public infrastructure found: *"an urgent need to comprehensively overhaul processes for assessing and developing public infrastructure projects."*

It pointed to *"numerous examples of poor value for money arising from inadequate project selection, potentially costing Australia billions of dollars"*. It argued that further spending under the status quo will simply increase the cost to users, taxpayers and the community, and lead to more wasteful infrastructure.(1)

2.8.3 Grattan Institute

At the request of the Senate Select Committee into the Abbott Government's Budget Cuts, the Grattan Institute recently prepared a paper on infrastructure financing and expenditure with a focus on transport infrastructure.(2) Their recommendations stand in stark contrast to the WestConnex planning process, which has failed to meet any of the standards outlined below (all excerpts taken directly from the Grattan Institute report):

"To get a better return from infrastructure spending, governments should focus on selecting the right projects, and on making the business cases and their underlying assumptions more transparent. Governments can also get a better return through use of new technologies to get more value out of existing infrastructure; through minor augmentation and relief of pinch points; and through more systematic maintenance.

"The capacity to waste money is a serious risk for infrastructure, given the very large amounts of money involved." (p.1)

"Infrastructure investment over the past five years has been about one per cent of GDP higher than a decade earlier. Such a significant increase would have been expected to have some visible effect on GDP growth. There is no evidence it has done so, with GDP growth still well below three per cent per annum and below historic growth rates.

"The wrong projects can destroy value and divert funds from projects that would be more valuable to the economy and community." (p.4-5)

"Australia could get better value from public infrastructure by making better project selections. Unreliable or non-existent cost-benefit analyses have been an obstacle to optimal project selection. Recent large infrastructure projects in Australia have typically suffered from cost overruns of about 15 per cent, while patronage has been 15 per cent lower than projected, on average. As a result, real cost-benefit multiples are expected to be about 25 per cent lower than projected on average. All other things being equal, this consistent overestimation of benefit-cost ratios is making uneconomic projects look viable at the approval stage." (p.5)

2.8.4 Prof Peter Newman, Professor of Sustainability at Curtin University

Prof Newman, a former member of the Infrastructure Australia board, has spoken out strongly against the processes surrounding WestConnex on a number of occasions.

Newman was a board member of Infrastructure Australia at the time the motorway was first proposed. He is also a member of a Scientific Advisory Committee with the United Nations Educational, Scientific and Cultural Organization (UNESCO).

Professor Newman considers that WestConnex only became a serious proposition when Prime Minister Tony Abbott took up the issue while still in opposition, and that the project is highly politicised.

He described the planning processes around WestConnex as, *"very tight knit… (this scenario) doesn't surprise me because I was involved in the planning side. The planning was really very, very light – just a few ideas being thrown together without any serious detailed work being done, and all the detail that was done showed very poor cost-benefit ratio.*

"They have completely subverted the normal planning processes and now they're subverting the consulting processes.

"It's corrupting the process, that is what you can say. It doesn't mean that it is corrupt in a legal sense, but it is close to the edge."

2.9 Conclusion

WAG formally and strongly objects to the lack of transparency and proper process in the WestConnex project, including the New M5, and we ask that the Minister for Planning reject the WestConnex New M5 project.



3.0 Objection to AECOM doing the EIS for the WestConnex New M5

WAG strongly objects to the fact that AECOM, the company contracted to compile this EIS, has deep interests in the planning and construction of the $16.8 billion motorway project, raising questions about the independence and integrity of the planning assessment process.

The same firm is the subject of ongoing legal action in Queensland. Last year, AECOM paid approximately $200 million to settle negligence claims for its traffic modelling for a privately owned toll-road in Brisbane. Legal firm Maurice Blackburn is representing 650 investors who are seeking to recover losses of more than $150 million from AECOM.

Brisbane's Clem7 RiverCity tunnel carried less than one quarter of the traffic forecasted after it opened in 2010. According to Maurice Blackburn's website, the case alleges that AECOM made forecasts without reasonable grounds, and left critical information out of its report published in RiverCity's Disclosure Statements.

It also allegedly failed to reveal that earlier traffic forecasts it had developed for Brisbane City Council showed traffic volumes substantially lower than those in the RiverCity Disclosure Statements.

We note that an international spokeswoman for AECOM told the media that the company would not be doing traffic modelling any more. It beggars belief that the NSW government could put some much reliance on AECOM for its traffic modelling in a project where the government is carrying the risk. AECOM has been paid $13 million to provide the NSW Baird government with this EIS.

This is one of six contracts the company has been awarded by the proponent over the last 18 months. The contracts have a combined value of over $9 million, and cover a range of services.

AECOM may have been awarded more recent contracts since Sydney Motorway became private, hiding anymore information from the public. The whole idea that such a massive project could be taken outside the normal rules of basic government

accountability is shocking and demands its own investigation. The previous contracts can be found here. http://whywestconnex.herokuapp.com/.

Even before its assessment was published or any feedback received, AECOM already endorsed the motorway on its website. It claimed - though these references seem to have been removed now - that *"WestConnex will assist in making Sydney a more liveable city by reconnecting communities, enhancing centres and significantly improving the urban domain along Parramatta Road"* and will *"provide welcome relief from congestion on the M4 and Parramatta Road…"*

These claims are hotly contested. An independent study commissioned by City of Sydney found that WestConnex will actually *increase* traffic congestion on Parramatta Road. In May the *Sydney Morning Herald* reported that the proponent's own traffic assessments show that the $16.8 billion WestConnex will not stop Sydney traffic from worsening.

AECOM's other work on WestConnex includes a contract to prepare the proponent's proposal for a new Stage 2 M5 East tunnel; a $4.9 million contract to conduct geotechnical investigations for the M5 Tunnel from South West Sydney to St Peters; a $700,000 contract for "Traffic Director" services; and two contracts worth more than $777,000 to work on the Stage 3 of the motorway, which is a tunnel linking the M5 and M4. These Stage 3 contracts include design engineering, business development, and environmental and technical services for the tunnel, about which almost no information is available. These are huge conflicts of interest when it comes to its contract to deliver this EIS.

WAG formally and strongly objects to the New M5 due to these conflicts of interests and serious doubts over AECOM's ability to produce a truly independent EIS, and we ask that the Minister for Planning reject the WestConnex New M5 project. We note that many members of the community and groups including WAG raised concerns about the conflict of interest in their submissions to the M4 East process. In its brief unconvincing response to these concerns, AECOM failed to respond to how it responds to conflict of interest.

It is this conflict of interest that leads to feeling in the EIS document that a project is being sold rather than independently evaluated. Every serious objection that is raised is simply batted away as insignificant. We would like to hope that there are professional planners in the NSW Department of Planning who are concerned about these matters and trying to do something about them.



4.0 Objection to the traffic modelling and analysis of alternatives to WestConnex

WAG strongly objects to the traffic modelling and analysis of alternatives to building the WestConnex New M5 included in the EIS.

Nearly all other claims in the EIS depend for their validity of the traffic analysis. However, there are major issues with the Traffic and Transport Assessment.

The Traffic and Transport Assessment does not stand up to scrutiny for a number of reasons:

- The EIS does not provide enough information about the methodology, input data or assumptions used in the assessment for the forecasts to be independently verified.
- It does not include a sensitivity analysis. The effects of varying key assumptions (e.g. drivers' willingness to pay the New M5 toll) have not been disclosed. How will traffic volumes be affected if (when) the willingness to pay for the toll is different to the point estimate used?
- It has failed to model the travel time and accessibility impacts for non-motorised modes (walking and cycling).
- The issue of induced demand is acknowledged but has not been fully addressed and is likely to have been underestimated.
- Impacts of disruptive technology (e.g. automated vehicles) on future driving demand have not been not considered
- Intergenerational changes in vehicle ownership, driver licensing and transport preferences have not been considered.
- Changes in aggregate transport measures have not been provided for the various scenarios, such as:
  - Overall increase in VKT
  - Change in average trip distance

Given the seriously flawed Traffic and Transport Assessment, there can be no confidence in the accuracy of the other impact analyses in the EIS that are dependent on the traffic forecasts, in particular:

· Air quality

- Noise and vibration
- Human health
- Greenhouse gas emissions.

As outlined in Section 1.0 of this submission, the stated objectives for the project were contrived to fit the project after it had already been announced. In a democratic strategic planning process, objectives are set first based on the needs and desires of the community, and then alternative projects/policies are appraised against their ability to meet those objectives.

The EIS has not modelled alternative policy scenarios that could meet the transport and accessibility needs of NSW's growing population, such as greater investment in public transport, road pricing reform, and land use planning that places more homes closer to employment and services.

It is no secret that the real purpose of the WestConnex scheme is to increase the road freight accessibility of Port Botany and Sydney Airport, and that private passenger vehicles have been included as a means of paying for it through tolls. However, there are various policy alternatives for dealing with the growing freight task that do not appear to have been considered, such as:

- Increasing the capacity and reliability of rail freight.
- Increasing rail freight subsidies to match/surpass those of road freight.
- Diverting container operations to other ports outside the city centre. Very few cities concentrate container operations in the city centre where road access is costly and has significant impacts on highly populated areas.

The New M5 and the WestConnex of which it is part will be used by less than 1% of the NSW population each day. The costs will be borne by the whole population. It can hardly be argued that it is providing for the "greater good".

The role of motorways in a multimodal urban transport network is to allow traffic to circulate around the edge of a city connecting low density suburbs, where the traffic does not directly impact highly populated areas. For radial transport into and out of

employment and activity centres, mass transit is faster and more efficient, requires less space, and has fewer impacts on highly populated inner-urban areas.

The EIS does not consider the cumulative costs of adding more urban motorways to those previously built through the heart of Sydney since the 1950s. Although the economic, social and environmental costs of each *individual* motorway (as reported in an EIS) may be considered by some stakeholders to be acceptable, the cumulative costs are considerable:

· Following decades of road expansion and consequential sprawl, Sydney now spends about 13% of its GDP on transport, while the average European or Asian city spends only between 5% and 8%.[1]
· Serious human health impacts due to petrochemical vehicle emissions/smog, including:
§ Lung cancer,
§ Asthma,
§ Heart disease,
§ Impaired lung development in children living near motorways/exhaust stacks.
· Waterways contaminated with road runoff (heavy metals and carcinogens in brake and clutch dust, exhaust particulates etc.).
· High traffic crash costs (of deaths/traumatic injuries and material damage).
· Urban sprawl and increasing commuting distances.
· Social isolation for non-drivers living in car-dependent suburbs.
· Noise pollution from traffic and its impacts on sleep.
· Impacts on visual amenity (pollution stacks, concrete interchanges, concrete flyovers).
· Extreme summer temperatures (urban heat island effect).
· Community destruction and severance.
· Destruction of heritage.
· Less incidental physical activity from walking and cycling (including to/from public transport), resulting in higher rates of obesity, diabetes, cancer and heart disease.
· Increased chauffeuring burdens for parents and carers.
· Less independence for children.
· High per-capita greenhouse gas emissions.



The EIS also fails to consider the cumulative negative impact of the WestConnex project as a whole, even though it repeatedly cites the supposed benefits of building the entire motorway as justification for building the New M5. At a minimum, it would be expected these would worsen the kinds of factors cited in the previous point, but this is not addressed in any meaningful way in the EIS.

Induced demand for tollways can happen at the same time as overall demand for driving drops due to other changes. It is crucial that all parts of Sydney have adequate public transport. Current plans for private light rail may help but certainly do not address the appalling under investment in public transport in Western Sydney.

The proposal is based on the idea that demand for road capacity will increase over time, without taking into consideration the changes in transport choices that different generations will make for a range of reasons, including environmental considerations, economics and the ease of public transport compared to congested roads.

Not investing in better public transport not only impacts on the communities around the St Peters interchange, but also leaves commuters with no option but to rely on their cars, in turn guaranteeing that congestion will increase over time.

4.1 SEARS not met

The EIS also fails to meet a number of the project's SEARs as detailed in the following table.

SEAR	Requirement met?	Reasons SEAR not met
An analysis of feasible alternatives to the carrying out of the proposal and proposal justification, including: - an analysis of alternatives/options considered, having regard to the proposal	No	The EIS does not include cost-benefit analysis, modelling, or any other objective analysis of feasible alternatives. Only

objectives (including an assessment of the environmental costs and benefits of the proposal relative to alternatives and the consequences of not carrying out the proposal), and whether or not the proposal is in the public interest, - justification for the preferred proposal taking into consideration the objects of the Environmental Planning and Assessment Act 1979, - details of the alternative ventilation options considered during the tunnel design to meet the air quality criteria for the proposal, - details of the short-listed route and tunnel options from the tender process and the criteria that was considered in the selection of the preferred route and tunnel design, and - staging of the proposal and the broader WestConnex scheme, and in particular access to Sydney Airport and Port Botany and improved freight efficiencies.		cursory descriptions are provided. No alternative staging strategies are described or objectively assessed.
Details of the proposal's relationship to and consistency with the broader WestConnex, and an assessment of the cumulative impacts taking into	No	Cumulative construction impacts for the New M5 and other WestConnex projects have not been modelled/reported. Only a

consideration the WestConnex program of works.		cursory description of cumulative impacts is provided. The assessment of operational cumulative impacts does not include past/existing developments, in particular existing arterial roads and motorways. Although the economic, social and environmental costs of the proposed New M5 on its own may be considered by some stakeholders to be acceptable, the cumulative costs of this and previous/existing/planned motorway developments are considerable: 1. Following decades of road expansion and consequential sprawl, Sydney now spends about 13% of its GDP on transport, while the average European or Asian city spends only between 5% and 8%.[1] 2. Serious human health impacts due to petrochemical vehicle

		emissions/smog, including: a. Lung cancer, b. Asthma, c. Heart disease, d. Impaired lung development and nervous system development in children living near motorways/exhaust stacks. 3. Waterways contaminated with road runoff (heavy metals and carcinogens in brake and clutch dust, exhaust particulates etc.). 4. High traffic crash costs (deaths/traumatic injuries and material damage). 5. Urban sprawl and increasing commuting distances. 6. Social isolation for non-drivers living in car-dependent suburbs. 7. Noise pollution from traffic and its impacts on sleep.

		8. Impacts on visual amenity (pollution stacks, concrete interchanges, concrete flyovers). 9. Extreme summer temperatures (urban heat island effect). 10. Community destruction and severance. 11. Destruction of heritage. 12. Irreversible Biodiversity loss. 13. Less incidental physical activity from walking and cycling (including to/from public transport), resulting in higher rates of obesity, diabetes, cancer and heart disease. 14. Increased chauffeuring burdens for parents and carers. 15. Less independence for children. 16. High per-capita greenhouse gas emissions.
Details of how the proposal meets the objectives of the overall WestConnex program.		The proposal does not meet the program objectives (see section 3 below).

An assessment and modelling of operational traffic and transport impacts on the local and regional road network (in consultation with affected councils), and the Sydney motorway network, including the consideration of planning proposals, major urban renewal and development, the potential cumulative impacts of Stage 3 – M4 South (Haberfield to St Peters), and the impacts of potential shifts of traffic movements to alternative routes outside the proposal area (including as a result of tolls).	No	The assessment of operational traffic and transport impacts is limited to a small study area around the project site. However, there will be significant traffic and transport impacts outside the study area, and indeed throughout the whole Sydney metropolitan area. The assessment of operational traffic and transport impacts ignores delays at new on-ramps and off-ramps. The EIS does not include any objective assessment or modelling of impacts on pedestrians and bicycles using the local and regional road network. Pedestrian and bicycle movements have not been included in the strategic model (WRTM) nor the intersection models (LinSig). There is no forecast of the impacts on walking and bicycling travel times and accessibility.

		As such the EIS does not provide a complete "assessment and modelling of operational traffic and transport impacts", it provides only an objective assessment of motor vehicle and public transport impacts within a small part of the area affected.
Induced traffic and operational implications for public transport (particularly with respect to strategic bus corridors and bus routes) and future public transport opportunities.	No	Induced demand has not been adequately accounted for because: 1) The model ignores the induced demand caused by long-term transport decisions of individuals and firms, including: Residential location choice – the project will encourage more people to move further from work (sprawl), thereby increasing average travel distances/demand. Work location choice – the project will encourage more people to work further from home, thereby increasing average travel distances/demand.

		Car ownership choice – the project will encourage more car ownership and use. Firm location choice – the project will encourage firms to locate in locations further away from their labour supply/customers/suppliers than they otherwise would, thereby increasing travel distances/demand. 2) To WAG's knowledge, there has been no long-term evaluation/verification of the methodology used to forecast induced demand (New Zealand Transport Agency Economic Evaluation Manual (EEM)). Induced demand by its nature materialises over several years, as people gradually move home/work location etc. Without a long-term evaluation/verification of the methodology, there can be no confidence in the induced demand forecast produced.
Impacts on cyclists and pedestrian access and safety and consideration	No	The EIS does not include any objective assessment

of opportunities to integrate cycleway and pedestrian elements with surrounding networks.		or modelling of impacts on pedestrians and bicycles using the local and regional road network. Pedestrian and bicycle movements have not been included in the strategic transport model (WRTM) nor the intersection models (LinSig). There is no forecast of the impacts on walking and bicycling travel times and accessibility.
An assessment of construction and operational activities that have the potential to impact on in-tunnel, local and regional air quality. The air quality impact assessment must provide an assessment of the risk associated with potential discharges of fugitive and point source emissions on sensitive receivers.	No	An accurate assessment of air quality impacts is dependent on an accurate assessment of traffic and transport impacts. Because the traffic and transport impacts have not been correctly modelled, the air quality impact assessment is worthless.
An assessment of human health impacts.	No	An accurate assessment of human health is dependent on an accurate assessment of traffic and transport impacts. Because the traffic and transport impacts have not been correctly modelled, the human

		health impact assessment is worthless.
An assessment of the noise impacts of the proposal during operation, consistent with the Road Noise Policy (EPA, 2011) and NSW Industrial Noise Policy (EPA, 2000).	No	An accurate assessment of noise impacts is dependent on an accurate assessment of traffic and transport impacts. Because the traffic and transport impacts have not been correctly modelled, the noise impact assessment is worthless.

4.2 Objections to the Traffic and Transport Assessment - Appendix G

General comments

The Traffic and Transport Assessment does not stand up to scrutiny. There is not enough information about the methodology, input data or assumptions for the forecasts to be independently verified.

The study area is too small to capture adequately the traffic and transport impacts of the project. The project will affect home location choice, work location choice, trip generation, destination choice, mode choice and route choice across the whole metropolitan area.

For example, people travelling between Penrith and the Airport will have a number of options (train; drive via M7/M2; drive via M4; drive via M7/M5; drive via un-tolled roads). The resulting changes in travel behaviour will have implications for local and regional traffic and transport throughout the Sydney metropolitan area. For example, more Penrith residents may be encouraged to drive to the city rather than use the train, which will (a) increase traffic volumes and associated impacts on local/regional roads

in/around Penrith and (b) reduce rail patronage, which could in turn lead to reduced service frequencies affecting remaining rail users.

The Traffic and Transport Assessment does not assess or even acknowledge these traffic and transport impacts beyond the study area.

There is no sensitivity analysis in the Traffic and Transport Assessment. The effects of varying key assumptions (e.g., willingness to pay the tolls) have not been described.

The travel time calculations do not appear to include delays at on-ramps and off-ramps. Although it is not even mentioned in the Traffic and Transport Assessment, the Business Case states that ramp metering will be used. This will cause delays for travellers entering/exiting the M5; these delays have not been included in the Traffic and Transport Assessment.

Travel time and accessibility impacts for non-motorised modes (walk and bicycle) have not been modelled or objectively assessed.

Impacts of disruptive technologies on future driving demand have not been not considered (e.g., automated vehicles).

Inter-generational changes in vehicle ownership, driver licensing and transport preferences have not been considered.

Changes in aggregate measures have not been provided for the whole study area, nor for the wider metropolitan area, e.g.,:

1. Overall increase in VKT.
2. Change in average trip distance.
3. Change in average trip duration.
4. Change in total travel time.

Section 3 Strategic context



The stated justification for the project is based on the discredited 'predict and provide' approach to transport planning, whereby it is assumed that transport demand will continue to grow, and that capacity must be increased to accommodate it. In practice, transport demand in cities is limited by capacity: as capacity increases, so does demand (induced demand). It is geometrically impossible to provide enough roadway capacity to accommodate all the latent demand for driving (i.e., where everyone can live and work where they want, and make all the driving trips they want, when they want, to wherever they want in free-flow traffic) in a city of Sydney's population.

Furthermore, the most efficient way to accommodate the transport and accessibility needs of a growing population is through *mass transit* and better land use-transport integration. Urban motorways are a very inefficient way of moving people around. A single traffic lane can transport a maximum of only 2000 people per hour (in ideal conditions); a single railway line can transport 20,000 people per hour.

The statement "It is acknowledged that any investment in motorway infrastructure has to be aligned with supporting public and active transport initiatives to achieve an increase in capacity, while aiming to reduce the reliance and demand of private vehicles on the future road network" is contradictory: increasing motorway capacity will only serve to *increase* private vehicle demand.

Assessment methodology

There is not enough information about the modelling methodology for it to be replicated and the outputs independently verified.

The transport model (WRTM) has not been made available for independent verification.

The model input data and assumptions have not been made available for independent verification. E.g. what toll prices have been assumed?

The model coverage area is too small to capture all the transport impacts of the project. The project will affect transport demand and behaviour across the whole metropolitan area.



More detail on the Value of Travel Time Saving (VTTS)/Willingness to Pay (WTP) model is needed. For example:

- The form and parameters of the model have not been given.
- If it was based on stated preference surveys, then how has the issue of hypothetical bias been addressed?
- Has the model been validated? Previous toll choice models in Australia have overestimated WTP for toll roads.
- Does it include the negative utility of the tunnel environment (monotony, no natural light, poor air quality)?
- Does the WTP estimate take into account tolls that motorists currently pay (toll saturation)? E.g., a road user may be willing to pay an additional $10/day if he/she currently pays nothing, but not willing to pay an additional $10 if he/she is already spending $15 on tolls.

The weekend period has not been modelled, despite current weekend traffic volumes being higher than weekday traffic volumes on many corridors.

The EIS provides insufficient information about the travel zone structure in the WRTM, including:

· What are the travel zones based on? How big are they?
· How are intra-zonal trips modelled?
· How are trips to/from external zones modelled?

Induced demand has not been fully addressed in this EIS. The model ignores the impact of the project on the long-term transport decisions of individuals and firms, including:

· Residential location choice: the project will encourage more people to move further from work (sprawl), thereby increasing average travel distances and demand for driving.
· Work location choice: the project will encourage more people to work further from home, thereby increasing average travel distances/demand.
· Car ownership choice: the project will encourage more car ownership.

· Firm location choice: the project will encourage firms to locate in locations further away from their labour supply/customers/suppliers than they otherwise would, thereby increasing travel distances/demand.

There appears to have been no long-term evaluation/verification of the methodology used to forecast induced demand (New Zealand Transport Agency Economic Evaluation Manual (EEM)). Induced demand by its nature materialises over several years, as people gradually move home/work location etc. Without a long-term evaluation/verification of the methodology, there can be no confidence in the induced demand forecast produced.

The EIS fails to provide sufficient detail on origin-destination demand matrix generation, including:

a) What are the form and parameters of the generalised cost function?
b) How were shortest paths calculated?

34) Insufficient detail on trip generation:

· What are the form and parameters of the trip production function, and how was it estimated?
· What are the form and parameters of the trip attraction function, and how was it estimated?
· Were trips were balanced towards attractions, or towards productions?

Insufficient detail is provided on trip distribution/modal split.

· What are the form and parameters of the gravity model used?
· What are the form and parameters of the deterrence function used?
· How has modal split been estimated?

The EIS fails to provide sufficient detail on road traffic assignment. E.g.:

· Is assignment stochastic or deterministic?
· What link loading/flow function was used?
· Were intersection delays included?

Insufficient detail on public transport assignment:

- How were access and egress points determined?
- How were route strategies determined?

Non-motorised trips have not been included in the WRTM or LinSig modelling.

Impacts on accessibility have not been modelled.

Most transport is not an end in itself; it is a means to access work, education, services etc. How does the project affect population accessibility? This EIS does not consider this.

Equity and equality impacts not described. For example:

- How many people are better off with the project?
- How many people are worse off with the project?
- Do benefits/impacts accrue to any population groups more than others, e.g., people with a disability or on low incomes?

The Downs-Thomson Paradox has not considered. The project will attract passengers away from public transport to road. As such, public transport patronage will be lower than it would be without the project. This could result in public transport service levels being cut, which will encourage further mode shift from public transport to road.

Given the numerous assumptions and approximations in the model, there needs to be some sensitivity analysis, e.g. How will traffic volumes be affected if (when) the WTP for the toll turns out to be lower than the point estimate used? Yet no such sensitivity analysis has been performed.

Assessment of construction impacts

Impacts on travel times for all modes (driving, public transport, walk and bicycle) have not been assessed/reported. The construction activities will delay travellers in a number of ways, e.g.:

1. Additional construction/workforce traffic.
2. Temporary road and lane closures.
3. Speed limit reductions.
4. Increased parking occupancy rates will mean additional time looking for parking.

Cumulative construction impacts for the New M5 and other concurrent projects have not been modelled/reported. Only a cursory description of cumulative impacts is provided.

Future year traffic volumes and patterns

Tables 79, 80, 81 do not include the base year (2012) values, so the future 'with project' scenarios cannot be compared with current conditions.

Figures 67, 68, 69, 70, 71, 72 do not include the base year (2012) values, so the future 'with project' scenarios cannot be compared with current conditions.

An assessment of the impacts on walking and bicycle demand and travel times has not been provided.

Future conditions with the project

Delays at on-ramps and off-ramps have been omitted from the travel time forecasts, so actual travel times will be significantly higher than those forecast.

The reported travel times savings have been selectively chosen to show only those routes where travel times are forecast to decline (i.e., the M5 itself). The impacts on travel times for adjacent routes have not reported, in particular Stony Creek Road, 1) Canterbury Road Forest Road and Queens Road. Travel times on these routes will increase significantly due to the large increase in traffic diverting to avoid the M5 tolls.

Network performance measures (VKT, total travel time, average speed etc.) for the whole study area (nor for the whole metropolitan area) have not been modelled or

reported. Only performance measures for the immediate area around the St. Peters Interchange have been reported.

Tables 99 and 100 of Appendix G of the EIS compare 'without project' to '2021 with project' and '2031 full WCX'. Figures for '2031 with project' are missing. WAG is aware that when Ben Aveling of Alexandria Residents Action Group (ARAG) enquired as to the missing information, he was told via an email from Louise Bonny of the SMC dated 13 January 2016 that:

"As described in section 10.3.2.1 of Appendix G, for the "2031 'with project' scenario" there is a significant increase in local trip generation and in the traffic demand to and from the WestConnex portal at St Peters. This increase would need to be accommodated by the surrounding road network without any increase in road space (i.e. without the future proposed WestConnex M4-M5 Link, Sydney Gateway and Southern extension projects).

"As noted in Section 10.3.2.1 (page 252), Paramics modelling suggests that only about 80 per cent of the traffic demand in the 2031 'with project' scenario could be accommodated by the existing road network. Modelling a scenario that can only accommodate 80 per cent of the demand results in outputs that are confusing as the model does not function properly and presents results that can be misleading.

"As noted in Section 10.3.2.1, in the absence of the development of the full WestConnex program of works, Sydney Gateway and the Southern extension, additional network upgrades would be required to accommodate the 2031 'with project' traffic demand in the St Peters interchange area....

"Although there is a significant increase in traffic demand in the 2031 'full WestConnex and Southern extension' scenario, the construction of the additional road network components proposed as part of the WestConnex M4-M5 Link, Sydney Gateway and Southern extension projects provide the additional road space and increases the ability to distribute and accommodate the predicted increase in traffic."

Ms Bonny also stated that *"Responses to these questions will also be addressed in the New M5 Submissions Report."*



If the proponent cannot even model the impact of the project without other unplanned and largely unfunded toll road projects, it should not be seeking planning approval for the New M5 as a standalone project. This EIS and proposal should be rejected on this basis alone.

Future conditions without the project

Impacts on walking and bicycle demand and travel times have not been modelled.

Does the LinSig intersection modelling take into account the impact that changes in intersection LOS will have on travel demand?

Failure to properly model impacts on King St, Newtown and surrounding area

WAG has been part of a massive campaign around King Street. Businesses are extremely worried. Although they have been represented by the Newtown Business Precinct there has been no attempt to consult with them directly. This is a major gap in the community feedback report. Indeed the CEO of SMC and the SMC's New M5 Project Director paid one visit to Enmore Theatre for a meeting at which it was clear that there was huge opposition to WestConnex and have not been seen again. Other submissions will have addressed the value of King Street as a precinct. We endorse these. We also stress that the King Street precinct extends down both Erskineville Road and Enmore Road that both be massively impacted by traffic flowing into Euston Road and Edgeware Rd. The impact of this is not even mentioned in the EIS.

Claims that there would be no significant changes to traffic on King St (Page 13-48) do not hold up to scrutiny when there are predictions that traffic on Campbell St, St Peters, alone will increase from around 13,000 traffic movements per day currently to around 59,000 movements per day in 2031. There is nowhere else for this traffic to go but into surrounding local roads, including King St, which will be placed under pressure to be expanded or have clearways introduced, killing the existing amenity.

There have been some suggestions that various intersections will be blocked to stop the flow but these solutions will have massive effects on residential areas nearby. The fundamental flaw in the project cannot be fixed with a small number of traffic tweeks.

Figure 9-1 shows that the traffic study area has been limited to local roads in close proximity to the proposed alignment and does not take into consideration roads that will also be directly impacted by the project. For example, only the lower part of King St, Newtown has been included in the study area, despite the whole road being used currently as a main arterial route. There is no information in the EIS at all about what will occur North of Alice Street.

Edgeware Road, Marrickville has not been included when traffic will be funneled directly from the project onto this road via Campbell St.

The EIS clearly states that "...no regular bus services operate along the M4 East Motorway or the M5 South West Motorway…" and that there "is a commitment to deliver bus priority along the M5 Motorway Corridor…" but gives no further detail on why this is not being pursued as a solution to existing commuter traffic congestion. Why is this not being given a priority as it would be a cheaper, quicker and better environmental outcome than pursuing this proposal which is expensive, will not significantly improve traffic congestion, will have irreversible and detrimental environmental impacts and to which there is strong community opposition?

The EIS (Table 9-17) does not include a survey of traffic volumes on Unwins Bridge Road, despite it being a major road in the vicinity of the proposed St Peters interchange and one that already experiences high volumes of AM and PM peak traffic. The EIS states that performance at some intersections would improve without the project due to other factors and the predictions made on page 13-45 show that some local roads would experience increases in congestion as a result of the project – this is evidence that this is an outdated transport solution as it does not actually fix the problem it purports to, which is reducing congestion.

There is information presented in the EIS showing that the purported benefits of the New M5 would not be realized without other projects being completed. As there is no certainty that these other projects would be funded, approved or built, there needs to be a proper analysis of what the consequences would be if these projects do not proceed.



From the limited amount of traffic modelling that has been done, WAG's analysis shows that In the Peak AM, 11 major intersections in St Peters and Alexandria would be the same or worse with the Westconnex after the New M5 is built in 2021, and in 2031.In the PM peak, 7 intersections would be the same or worse off. The NSW government is deliberately planning to make traffic congestion, which is already a costly risk to health and liveability, worse. Drivers would be paying expensive tolls only to end up in a traffic jam losing where limited savings are lost.

AM Peak Intersections that would be the same or worse off in 2031 include

Princes Highway/Sydney Park Rd
Princes Highway Campbell Street
Princes Highway Canal Rd
Sydney Park Rd and Mitchell Rd
Sydney Park Rd Railway Rd
Sydney Park Rd Euston Rd Huntley St
Unwins Bridge Rd Campbell St
Campbell Street Euston Rd
Campbell Rd Burke St
Gardeners Rd Burke St
Gardeners Rd O Riordan St

PM Peak

Princes Highway/Campbell St
Princes Highway Railway Rd
Sydney Park Rd Euston Rd

Unwins Bridge Rd Campbell Street
Campbell Rd Euston Rd
Gardeners Rd Burke Rd
Gardeners Rd Riordan Rd

This analysis is drawn from Tables 99 and 100 in the Traffic Analysis. If our analysis is wrong tell us exactly why and which ones are wrong.

What sort of transport planning merely aims to make one spot a little better while another is a little worse. If the government approves this project it will be consigning a whole region of population growth to endless traffic congestions.

'Without project' scenarios do not allow for any other solution that might have been found to lesson traffic through providing better public transport, traffic management and through changing work patterns.

Even some of those intersections that would improve would not do so until after parts of the growing Westconnex system that are currently not 'plans' at all - just political concepts. Most community members find it shocking that a government would proceed to spend billions of dollars on this project.

When WAG has asked at EIS sessions for an explanation of why the traffic modelling was not done beyond two intersections, we were told that this was a decision collaboratively made by AECOM and RMS. This decision could only have been made to try to hide the impact on local roads which of course will become a costly public problem that will be isolated from the costs of Westconnex when it should rightfully be included in the total estimates of cost for Westconnex.

WAG objects to the traffic modelling being so limited in scope and not being independently verified when such a vast amount of tax-payers money and significant environmental and social impact is at stake. Given the flaws in traffic modelling for previous largescale motorway projects in Sydney and other Australian cities, it is vital

that the traffic modelling be independently verified and submitted for public consultation prior to project determination.

4.4 Poor analysis of alternatives

There is a big problem with both the Proponent and the RMS, the client for this project having a primary purpose of building new roads, rather than being focused on wider transport options, as they will by nature propose that a new motorway is the preferred solution despite overwhelming evidence showing that this is project should not be built. This is a fundamental problem with the whole EIS.

The EIS discussion of other options to reducing congestion and improving the M5 all focus on road solutions and repeating earlier road schemes and strategies, rather than providing a comprehensive analsyis of different transport solutions. The EIS does not meet the requirement to provide a true analysis of alternatives, such as improved public transport and better traffic management.

The summary in Section 4.1.1 in relation to the strategic concept for the M5 East Duplication shows that the community has previously raised concerns, including about air quality, biodiversity and traffic impacts, with having a motorway extension in this area. These concerns are not adequately addressed by the current proposal, as it is in direct conflict with the community's wishes, making a mockery of the consultation process and showing how little consideration the Baird Government and Westconnex has given to feedback from the community.

Section 4.2.2 outlines reasons for why a project focused only on improving the existing M5 motorway is not preferred, including "significant constructability, social and environmental impacts to existing residential and commercial development along these roads" and that improvements to one section "would increase the demand on adjacent sections of the road network such as the airport tunnel which is already operating at or near capacity…and has limited capacity to cater for additional traffic." Given these same impacts would arise from constructing the proposal, it is nonsense to use these as reasons for not improving the existing M5 yet proposing to impose the same impacts when building the new M5, which would be at a much larger scale of impact.



The discussion on public transport alternatives does not address any of the specific details of the movement of commuters and freight along the proposed alignment, apart from some general discussion about the East Hills rail line.

There are currently no commuter busways up the existing M5. This provides a chance for taking at least some of the commuter cars off the existing M5 by provision of busways which in turn would provide more capacity on this road for the short-haul freight journeys that the proposal is supposedly trying to address. The summary that “no feasible strategic transport alternatives such as heavy rail or light rail options or bus corridor enhancements would meet the diverse range of customer needs…” is not supported by any detail.

Analysis in the context of planning should surely include some presentation and comparison of evidence including quantitative information. The alternatives section reads like an afterthought rather than a genuine consideraiton of alternatives.

Section 4.2.3 outlines predicted population growth and implies that while the majority of this growth will reside in western Sydney where there is more affordable housing, most jobs will still be located in the east – surely this supports the argument for investment in more public transport now rather than investing in a road that will only become more congested with future population growth? As the CEO of the City of Sydney told a Sydney University forum last year, there is something fundamentally wrong with continuing to skew Sydney’s transit systems to the edge. This project simply embeds the traditional short sighted thinking.

This section also states that “..to have a major impact on road traffic, demand management measures would require considerable changes to social attitudes, travel behavior and government policy.” This appears to be a justification for not more actively pursuing demand management measures, No detailed reasons are given for why demand management is not going to be more actively pursued. Given this proposal is being developed and championed by the Government, it is puzzling that government policy is used as an excuse not to do something in this context. Government policy can have a significant impact on social behaviours and attitudes when used proactively and constructively. It is worrying that the push for Westconnex is not occuring in the context of other more enlightened government policy development.



Table 4-2 assesses each of the project objectives against strategic alternatives. The first objective is focussed on improving motorway access, showing that at the heart of the proposal there is an agenda to only build a new motorway and to shape all justification around this, rather than considering and analysing true alternatives. Given this, it is unsurprising that only the new M5 options ticks all of the boxes of this assessment, but it does show the cynical way in which the Proponent and Government is trying to push this project onto a community that clearly does not agree with the need for it, or with the approach being taken by the Government.

Selection of St Peters for the northern interchange location has been made on the basis that the impacts to freight and industry stakeholders would be too great if other options were explored. Given that displacement of freight and industry does not have as great a social, visual or noise and vibration impact as the residential displacement that is being proposed, this does not make it an adequate justification.

Statements that the St Peters interchange is designed to “draw through traffic off local roads” and “distribute traffic using the established urban arterial road network where possible…” are ridiculous given that the increase in traffic that is being predicted for this project will have nowhere to go but the local road network, which is not proposed to be upgraded beyond the proximate junctions with the interchange.

We object to the inadequate analysis of alternatives that have been provided as part of the EIS as it does not meet the requirements of the SEARS, particularly the clauses relating to whether or not the proposal is in the public interest and justification for the project taking into consideration the objects of the Environmental Planning and Assessment Act 1979.

4.6 Objections to operational impacts

It deals with the impact of the *operation* of the New M5 EIS as assessed in the 150 page Chapter 9 of the EIS and associated 298 page Appendix G. Part 1 provides an assessment of the information in the EIS relating to the construction of the project.



In reading and analysing the Traffic and Transport section of the M5 EIS, the following points and concerns are noted.

The "Full WestConnex program of works and Southern extension (2031)" includes all WestConnex projects as completed, *although does not include the M4-M5 Link additional harbour crossing or CBD north access at Rozelle*, as the ANZAC and Harbour Bridges are already at or close to full capacity as acknowledged by the report (Appendix G, p. 33). Those aspects that will benefit the case for the M5 project, particularly regarding traffic modelling, are included (such as the "Full WestConnex project"), but where the case might struggle they are excluded

NSW Freight and Ports Strategy (Transport for NSW)—this strategy is used to justify that provision of an alternative route and saved travel time would lead to network sustainability outcomes through "long-term savings in greenhouse gas emissions" (Appendix G, p. 26), however it would be necessary to show further evidence regarding how extending a road will reduce greenhouse gas emissions, given the complicated effects of induced traffic demand, among other phenomena. *Also, is this the more "sustainable" option compared to improving the rail freight network over the same period (shifting freight to rail is after all a priority for the NSW Government)?*

The fact that the WestConnex Road Traffic Model has two components, and one of them is a Toll Choice Assignment Model specifically to try to predict toll choice behaviour (see

Appendix G, p. 31) indicates the impact of tolls on driver behaviour, and that those charged with modelling the project are highly concerned with the effects of the tolls on matters such as “rat running” and on the economic viability of the project. It must be remembered that figures produced from this aspect of the modelling are not certainties, and far higher numbers of people might choose to avoid tolls and “rat run” for any number of reasons

Land use projections, such as known major urban renewal and developments, as well as induced demand are claimed to be considered in modelling (see Appendix G, p. 32)—*It is extremely difficult to determine the exact effect of new urban development on travel behaviour—for instance the creation of a local precinct might greatly reduce the impetus for residents to use or even own a car—and predicting induced demand is a complex and imprecise practise in itself (not to mention that the many negative impacts of induced demand are glossed over and not mentioned at all in this section of the report)*

The “modelled years” have been chosen specifically as those that represent the best traffic modelling case for the M5 project:

- 2021: Despite the project projected for completion in 2019, 2021 is used as the forecast year “to allow for full ramp-up of traffic demand as travellers respond to the provision of the project” (Appendix G, p. 32)

- 2031: Used as the **"10 years after opening [case] as required in the Roads and Maritime assessment guidelines"** (Appendix G, p. 32), despite, as mentioned above, project completion projected for 2019. *This modelling, then, does not meet RMS assessment guidelines*

The paramics modelling produces four hour peak periods, but this data is only available from the traffic forecasts in one hours sections, so "The forecast one-hour value was spread across the four-hour period to reflect a typical peak shoulder profile" (Appendix G, p. 38). *This simply reinforces the point that with all traffic modelling, but especially at this scale, there is a high amount of approximation, appropriation and estimation of data—which is not appropriately acknowledged throughout subsequent parts of this traffic section, or indeed throughout the entire EIS document*

- Further, the modelling found that: "In some cases, the one-hour future demand would exceed the road capacity. These calculated future demands were then flattened to correspond with anticipated peak spreading, allowing for a longer peak period" (Appendix G, p. 38), *indicating that where modelling results were poor, this traffic was simply "spread" out and the assumption was made that some of this traffic could travel at other times—a measure that is difficult to justify considering the same practice might be used to improve future M5 "without project" modelling—simply by "flattening" use until the peak period spreads out sufficiently to improve network functioning*

Travel around the St Peters interchange indicates low car mode share and high walking for Sydney and Marrickville LGAs, while Botany Bay's mode share aligns closer with the greater Sydney average (see below)—indicating that those that stand to benefit most from the project are not those that face the impacts of the project being implemented

Above: Average weekday mode share for local government areas around proposed St Peters interchange (Appendix G, p. 54)

The report notes that there are seven well-serviced train stations in or in the vicinity of the study area (Newtown, Erskineville, Green Square, St Peters, Sydenham, Tempe, Mascot) and a comprehensive bus network services the surrounding job and activity precincts—*what modelling has been undertaken to seriously investigate the possibility of better using this infrastructure as an alternative option to the M5 project? To what extent will these services suffer from a loss of patronage and changed traffic conditions (busses) as a result of the project?*

In Ch 6 Existing road network performance, 6.1 Assessment criteria:

The report warns that following the project "there may be single locations where there may be improvement, while at others some deterioration" (Appendix G, p. 67)—*do the "improvements" outweigh the "deterioration", and the lack of improvement in many other instances, enough to warrant such an extensive project?*



In describing LoS the report notes that "It should also be noted that capacity constraint can be used as a demand management technique which discourages car travel and that conversely over-provision of capacity can encourage more car use." (Appendix G, p. 68)—*does this suggest that when the M5 modelling produced poor results a low LoS became "a demand management technique"? Was the current situation, similar in that some intersections and road sections are operating at a low LoS, ever considered "a demand management technique"?*

"The actual LoS would be worse than presented here, as the LoS only represents the satisfied demand (capacity) and, due to downstream congestion and queueing at these locations, they underestimate the actual demand" (Appendix G, p. 236)—yet instead of being a starting point for analysis of the pros and cons of this M5 project, these figures are used (regularly) as the final justification for this project. There is a need to be careful about how such figures are used, as they can seem very real and solid whereas they are certainly not guaranteed to happen

- "…Therefore, the v/c ratios and LoS should be seen as a base for comparison, or indication of change for future scenarios, **rather than absolute values**" (Appendix G, p. 69). Moreover, these present a "worst case scenario" of traffic and congestion: more recent trends such as "peak car" (see http://m4eis.org/2015/09/30/note-explaining-automobile-dependence-peak-car-use-and-induced-traffic/) would indicate that travel preferences are changing and that continuing to model upward trends of car use is an outdated (and risk-laden) assumption
- In addition to these issues with modelling, the scope of the project that is modelled does not allow for the full, system-wide effects of the operational project to be analysed

sufficiently. Increasing the scope to a more appropriate scale for such a large project would go some way to identifying its true impact, and would also better allow the cumulative impacts of the project on traffic and transport to be gauged

"Modelling" future crashes, the results of which are used as a justification for the project within the report, is based on a simple assumption that "future frequency, type, and severity of crashes" would remain similar, so using this "formula" and given increasing traffic volumes an increase in *predicted* crashes is assured using such an approach. A more detailed and sensitive model might provide a more accurate estimate of future trends

- The report also states that crashes will decrease due to reduced congestion as a result of the project (Appendix G, p. 241-242), however no estimations are made regarding whether each crash that does occur will be more damaging, expensive and deadly due to higher speeds and changed traffic conditions

Levels of service (LoS) and volume to capacity ratios (v/c ratios) are advised to be only used as "a comparison, or indication of change between scenarios, rather than absolute values"—yet throughout the document these are used as if they are certainties. This further adds doubt to the economic viability of the project, given the difficult in estimating future patronage patterns

"There may be a shift to public transport as a result of the increase[d] travel times [under the "do minimum" scenario]" (Appendix G, p. 211)—little more is said on this point in the

report, however this is certainly a viable (not to mention attractive, given that most cities are strategically aiming to curb car usage and encourage active and public transport) alternative at face value that should have been more thoroughly investigated

"For the purpose of assessing the impacts of the project on surrounding roads, with an exclusive focus on the study area rather the wider Sydney network, it is acknowledged that the adopted three stage approach: forecasting, rebasing and operational traffic modelling, provides a more accurate representation of how future year traffic growth would affect observed traffic demands than direct output from the WRTM. However, a wider assessment can also be undertaken using only traffic forecasting data as this provides evidence of high level patterns across parallel strategic corridors external to the study area for peak and daily time periods. Consequently, traffic volumes were directly sourced from the WRTM for key roads in the study area" (Appendix G, p. 221)—*if both sources have acknowledged strengths and weaknesses why were both not used to gain a more thorough picture of local* and *wider functioning?*

- As an example, the "Screenline" analyses is taken directly from the WRTM, it is not rebased as outlined elsewhere in the report (Appendix G, p. 222)

All modelled outcomes included in the report refer ultimately to the "full WestConnex and southern extension" scenario as that to best justify this project. However given that the complete WestConnex project has yet to gain planning approval, and especially considering that design and cost changes continue to impact on the project, this is



difficult to justify. *Would the M5 project stand up to scrutiny if it were assessed as a stand-alone project? What if the subsequent WestConnex project is delayed or not built?*

- For instance "Although there is a significant increase in traffic demand in the 2031 'full WestConnex and future Southern extension' scenario, the construction of Stage 3 provides the additional road space through the Sydney Gateway proposals and increases the ability to distribute and accommodate the predicted increase in local traffic" (Appendix G, p. 252), yet after saying this, details of *how* stage 3 will accommodate the additional traffic are not given, however then details *are* given for 2031 without the project/2031 including the full WestConnex project. It is misleading to only provide details of these two scenarios only, considering there is a possibility that Stage 3 will not gain planning approval or will not be deemed economically viable
- For instance, *what would the results below look like if the "with project" (without the full WestConnex) modelling was included?* (note that LoS D, E or F are all deemed necessary to require action to improve their situation by the RMS—do not simply assume that "green" equates to a good LoS!)

(Appendix G, p. 255)

"Based on the analysis of WRTM output and screenlines, traffic is forecast to divert off the motorway network to use other routes (in particular, Stoney Creek Road) outside the peak traffic periods to avoid the proposed toll" (Appendix G, p. 233)—the negative impacts of behaviour such as "rat-running" that tolls encourage are omitted from the report

At Level of Service (LoS D) or worse (D, E or F) actions are generally taken to resolve the problem, and the report states that pinch points, limited road capacity and built up areas in Sydney often lead to LoS E and F ("regularly experienced by motorists")—"Roads and Maritime have a program of works aimed at relieving congestion at pinch points and

improving performance on strategic roads". The subsequent report reveals a number of roads and intersections that will operate at such a poor LoS—to build such an extensive and expensive project with numerous sections operating at LoS D, E or F *immediately upon completion*, whereby Roads and Maritime will have to "have a program of works" to address the situation straight away, suggests that the M5 and wider WestConnex project is an obsolete road and transport "solution"

- For instance the New M5, between Southern extension and St Peters interchange, is forecast to operate at LoS C in 2031
- The King Georges Road Interchange Upgrade is **f**orecast to operate at LoS F in both AM and PM peaks in the 'do minimum' and 'full WestConnex and Southern extension' scenarios (Appendix G, p. 239)
- In 2021, at the St Peters interchange, "In both AM and PM peak hours, the network performance with the project improves slightly compared to the network performance without the project. In the AM peak hour, the average travel time per vehicle through the network reduces by nine per cent, with the average speed per vehicle increasing by 17 per cent. In the PM peak hour, the average travel time per vehicle through the network reduces by seven per cent and the average speed per vehicle increases by 16 per cent. This indicates a slight easing of congestion with the project in 2021" (Appendix G, p. 250)
- In 2031, with the M5 project, "there is a significant local increase in local trip generation which needs to be accommodated in the network" (Appendix G, p. 251)—this is not sufficiently addressed throughout the report
- From 2021 to 2031 under the "with project" (only the M5—not the entire WestConnex project) modelling, total network traffic demand is projected to increase by approximately 17% in the peak AM period, and 16% in the PM period, which then "needs to be accommodated without any increase in road space attributed to WestConnex Stage 3" and **"**paramics modelling suggests that only about 80 per cent of the traffic demand in the 2031 'with project' [that is, without the other WestConnex projects being constructed] scenario could be accommodated in the network" (Appendix G, p. 252-253). *How can a project for which the surrounding existing road network can only accommodate 80% of the traffic it generates be proposed as a "solution" to traffic congestion? What is the contingency plan if the subsequent WestConnex project is not undertaken?*



- In 2031 the “without project” modelling for AM peak hour projects vehicles to travel through the area at 18.9km/h, while with the full WestConnex project plus the southern extension this rises to just 26.9km/h. Similarly, in the PM peak period, average speed rises from 16.3km/h to 28.3km/h. The resultant speeds remain insufficient to justify this project (and they themselves are reliant on the subsequent third WestConnex stage as mentioned above)
- Intersection LoS is projected to remain poor around the St Peters interchange area for AM peak hour levels (from 2 LoS D and 4 LoS F ratings without *any* of the project implemented to 5 LoS D and 3 LoS F with the full WestConnex project), and will also be poor for the PM peak hour which contains 2 LoS D, 3 LoS E and 3 LoS F intersections—the report itself states that **“**At LoS D or worse, actions are generally seen as necessary to resolve the problem**”** *[which leads to questions of why LoS D is depicted as green in tables in the report, E as orange and F as red—surely LoS D and worse deserves to be graded “red”, or poor, for a new project billed as a “solution” to congestion?]*
- “Due to the extensive change in the road layouts as part of the St Peters interchange and the local road upgrades, there are permanent impacts on property and business access and on street parking provision”—but these details are not given in this report making it difficult to evaluate their impact. What is known is that they will include additional parking at Campbell Street (34 on-street and 26 off-street spaces), loss of 44 spaces along Albert Street, loss of 111 spaces along Campbell Road, loss of 23 spaces along Burrows Road, loss of 24 spaces along Euston Road, loss of 28 spaces along Huntley Street, 18 less spaces on Princes Highway, 38 less spaces along May Street, 33 spaces lost along Unwins Bridge Road, possible loss of spaces along Brown, Florence, and St Peters Streets, loss of 47 on-street parks on Gardeners Road and loss of 16 off-street parks along Bourke Road (Appendix G, p. 268). An overall loss of 382 (and potentially more) parking spaces represents a significant impact on the local community, and as would be relevant for this section—*will more restricted parking lead*

to additional localised traffic and parking issues?—such impacts are not addressed in the EIS report

To claim that the project aligns with *Sydney's Walking Future* and *Sydney's Cycling Future,* as is done the report, overlooks major aims of these documents such as increased mode share of active transport, improved pedestrian and cyclist safety and promotion of healthier lifestyles

In terms of management of impacts, the only management initiatives proposed in the report are that layout changes are designed to "complement and/or mitigate the impacts of the project", undertaking an operational traffic review 12 months following operation of the project (*by which time it would be too late to significantly address any of the flaws of the project, especially given that "The assessment has identified a number of intersections where the operational performance would change significantly under the future traffic demands as modelled")*, and to engage in "integrated network and corridor planning processes" (including setting objectives, analysing actual versus projected performance, maintenance of existing control systems and identifying strategic funding priorities) (Appendix G, p. 270-271). *No concrete and satisfactory management initiatives are proposed, and the "impacts" they will supposedly address are not given in any form of detail or consistency throughout the report*

4.6 Conclusion



WAG formally and strongly objects to the traffic modelling and analysis of alternatives to building the WestConnex New M5 included in this EIS, and we ask that the Minister for Planning to reject the WestConnex New M5 project.

5.0 Objection to the corruption of planning process

WAG objects the corruption of proper planning processes that characterises WestConnex, including the New M5.

As the NSW Planning Department is aware WAG sent in a large submissions of concerns about the M4 East. We were dismayed to see how nearly all of these were superficially rejected in the Response to Submissions report which were were not even notifed had been published. We know that citizens have made serious complaints about breakdowns in the process and the lack of adherence to principles of access. We are aware too that they have not even been able to find out what guidelines the Planning Department uses to deal with complaints. Planning department staff have told members of our group that some of the problems came about because so many submissions were received. This is a ludicrous situation. The Planning Department imposed unreasonable demands on the community to deal with highly complex poorly presented documents and then expect the community to accept it when it cannot deal with the process properly. This raises serious questions about the independence of the process.

WAG also has other objections in relation to the corruption of the planning processes for this project, which we have detailed below.

5.1 Strategic development

There is a requirement for the EIS that the proponent's proposal is consistent with all Sydney's strategic planning instruments. Requiring this project to be consistent with all strategic planning instruments sounds reasonable until you realise that all the plans were rewritten in 2012/2013 to place WestConnex at the centre of their transport strategies.

Up until 2012, metro strategy development in NSW was based on developing the broad strategy planning objectives and then discussing options to meet these strategic objectives before proposing individual projects/actions. Linking the M4 with the M5, as proposed by WestConnex, was never included as a project to realise previous Metropolitan Strategies.

Once WestConnex became the number one infrastructure project proposed by Infrastructure NSW, all strategic planning documents were rewritten to include



WestConnex. In fact, it became the centrepiece of the transport strategy. This was after extensive community consultation was undertaken in February 2012 for the Long Term Transport Master Plan, which did not include Westconnex.

At the time, Les Walinga, the then Director General of Transport, was on the Board of Infrastructure NSW and at the same time was developing the Long Term Transport Master Plan. When Infrastructure NSW proposed WestConnex as the major infrastructure project of its plan, Les Walinga resigned from the Board citing conflict of interest as he was proposing public transport solutions in the Long Term Master Plan and was not supporting WestConnex. Even within Infrastructure NSW there was doubt about the appropriateness of WestConnex.

Even allowing for the bastardisation of the planning process, there are a number of areas where the New M5 is clearly not consistent with the Metro Strategy. These include:

- Does nothing to alleviate Western Sydney congestion
- Is an unsustainable solution as it will reach capacity by 2031
- Does not relieve traffic congestion on most downstream intersections.

In 1998 the NSW government released *Action for Transport 2010 an integrated transport plan for Sydney*. According to page 2 of this plan, it proposed to:

“redress the [then] current imbalance in the road and public transport system.”

The plan included a 10 Point Action Plan for Sydney:

1. Getting the best out of the Sydney system
2. Improving Sydney’s air quality
3. Reducing car dependency
4. Meeting the needs of our growing suburbs
5. Getting more people on public transport
6. Safeguarding our environment
7. Making space for cyclists and walkers

8. Preventing accidents and saving lives
9. Making freight more competitive
10. Giving the community value for money

The plan listed 21 projects to be completed or started by 2010. These were:

Rapid Bus Only Transitways

1. Liverpool to Parramatta (2003)

2. Parramatta to Strathfield (2002)

3. St Marys to Penrith (Stage 1 2003) (Stage 2 2008)

4. Parramatta to Blacktown (2004)

5. Blacktown to Castle Hill (2009)

6. Blacktown to Wetherill Park (2006)

7. Parramatta to Mungerie Park (2010)

Heavy Rail

1. **Airport Line (2000)**
2. Bondi Beach Railway (2002)
3. Parramatta Rail Link to Epping and Chatswood (2006)
4. Hornsby to Newcastle High Speed Rail (Stage 1 to Warnervale 2007) (Stage 2 to Newcastle work to start by 2010)

North West Rail Link Epping to Castle Hill (2010)

1. North West Rail Link Epping to Castle Hill (2010)
2. Sutherland to Wollongong High Speed Rail (2010)
3. Hurstville to Strathfield Railway (To start by 2010 and be completed by 2014)
4. Liverpool Y Link (Work to start by 2010

Light Rail

16. To Lilyfield (2001)

Road Improvements

17. Eastern Distributor (2000)

18. M5 East (2002)

19. Cross City Tunnel (2004)

20. M2 to Gore Hill (2004)

21. Western Sydney Orbital (2007)

All the projects in bold were built. It can be seen from the list that every road project was delivered. Of the 16 public transport projects only four were completed.

The inability for successive governments to deliver public transport projects has made Sydney (particularly western Sydney) more car dependent. Building more roads has not had any lasting impact on road congestion. No evidence has been provided in this EIS to suggest WestConnex will be any different. This project will not reduce car dependency, meet the needs of our growing suburbs, or get more people on public transport.

5.2 Contracts being signed before planning approval is granted

Another unusual feature of the New M5 is that while the EIS must look at “feasible alternatives” and “project justifications”, the contracts for construction will and are being awarded before this EIS was completed or planning approval granted.

Asked whether he would prefer to grant approval before the contract was awarded or whether he had any concerns about the process, Minister Stokes told *New Matilda*, *"Timing of contracts is entirely the proponent’s responsibility and is not a consideration in the assessment process. However it is clear that no work on any project is able to*

commence without planning approval…. I do not intend to treat this project differently to any other project that comes to me or the Department."

WAG believes that awarding the contracts before approvals as though such approvals are merely "green tape" is neither acceptable nor democratic.

5.3 Politicisation of the process by government officials and Ministers

One of the most disturbing elements of the WestConnex project has been the highly politicised nature of any discussion around the WestConnex. Expert analysis presented by the likes of SGS Economics and Planning, who prepared two independent reports on WestConnex for the City of Sydney, and even the NSW Auditor General have been dismissed by the NSW Government.

Perhaps the most shocking public example of this was the treatment meted out to Dr Tim Williams, CEO of the Committee for Sydney, after he strongly criticised WestConnex and the highly politicised road-building ideology that lies behind these kinds of infrastructure projects in an heavily researched presentation at the University of Sydney in April 2015.

Within days of his speech being reported in the *Sydney Morning Herald*, Dr Williams backed away from the criticism, saying in a letter to the *Herald* co-signed by Committee for Sydney chair Lucy Turnbull that the speech reflected only his personal views, despite the fact that his presentation was made on Committee for Sydney-branded PowerPoint slides.

Days after this letter appeared, Roads Minister Duncan Gay admitted in Parliament that he and his staff had made angry phone calls to pressure the Committee for Sydney to retract Dr Williams's comments, saying:

"I did most of the phoning but my office did some as well...This was an appalling situation in which there was a rogue operator using the Committee for Sydney's material

without their permission. In the strongest possible terms I prosecuted that case to the members of that committee, as did some of my staff."

It is hard not to conclude that the pressure placed on the Committee for Sydney by Minister Gay and his employees did not play a pivotal role in Mrs Turnbull and Dr William's decision to make such a public and humiliating backdown from his well-informed speech, which was in line with credible international analysis on best practice urban and transport policy.

It is a chilling development when elected officials use their power to shut down open and democratic debate on an issue in which so much public money, the future prosperity and liveability of Sydney, and the quality of life of thousands of people rests.

5.4 Compulsory acquisition of properties before planning approvals are granted

Similar to the process for the M4 East, residents and businesses in St Peters and Kingsgrove received compulsory acquisition notices before this EIS was released, let alone planning approval for the project granted. This has had the effect of residents being forced into a timeline for negotiations with the RMS (which has been charged with acquiring properties for WestConnex) for properties being taken for the New M5 before this project has received planning approval.

Residents, some of whom have lived their whole lives in the district, are being forced from their homes, often with what is considered inadequate funds to secure housing within the neighbourhood. Residents report that RMS staff are behaving in a forceful and bullying manner towards them. WAG has been contacted by numerous home and business owners affected by WestConnex compulsory acquisitions across the route, including the New M5, who have reported being offered hundreds of thousands of dollars less than what they are legally entitled to. All of these affected property reported suffering physical and mental anguish as a result of the process, with anxiety, depression, insomnia, relationship strain, significant weight loss and worsening of existing conditions such as schizophrenia, chronic fatigue, and high blood pressure all being reported to WAG as a direct result.



In January 2016, a series of articles in the *Sydney Morning Herald* by Sean Nicholls revealed that the NSW Government was told three years ago that this compulsory acquisition process was unfair to property owners. In the piece that ran on 11 January 2016, it was revealed that:

Hundreds of millions of dollars worth of property is being forcibly resumed by the NSW government to make way for major infrastructure projects such as the WestConnex motorway using a system it was warned three years ago was unfair to landowners.

Despite the report of a parliamentary committee chaired by Liberal MP Matt Kean calling for an overhaul of the compulsory acquisition system, the government has not implemented key recommendations while forging ahead with forced resumption of private homes.

…[M]any landholders have complained they are being given compensation hundreds of thousand of dollars below market value, amid the recent Sydney property boom.

Under the Land Acquisition (Just Terms Compensation) Act, if a landowner cannot reach agreement with the government about how much they will be paid, the Valuer-General provides a valuation as part of a compulsory acquisition.

The landowner can appeal the decision to the Land and Environment Court. But doing so can cost tens of thousands of dollars.

In 2013, the joint standing committee on the office of the valuer-general published a major report on the NSW land valuation system.

It found the compulsory acquisition system is "unfair and inadequate".



"The entire approach to objection and compulsory acquisition valuations requires a paradigm shift where landholders are no longer seen as the receiver of a valuation notice, but rather as an interested party, whose views and opinions are entitled to be heard," the report found.

It recommended landholders be legally entitled to two conferences – in person, by telephone or online – with the valuer or acquiring authority after they make a submission on the valuation of their land.

Far more information should be disclosed about how the valuation was made, the committee said, while authorities should be required to provide in writing reason for rejecting a landholder's submission. Similar rights are in place in Victoria and Queensland.

The report found that "the current costs associated with litigation in the Land and Environment Court represent a material barrier to the enforcement of legal rights."

A full hearing in the Land and Environment Court can cost $100,000 in fees for lawyers and experts.

The report also recommended landholders be entitled to a merits review of their valuation in either the Land and Environment Court or the more affordable option of the NSW Civil and Administrative Tribunal.

Vincent Butcher, a lawyer at Slater and Gordon representing over 100 property owners affected by WestConnex, NorthConnex and other projects said the Land Acquisition Act states a person should not be put in a worse situation.

"The process in which the acquiring authority is engaging in restricts and doesn't give land owners a fair opportunity to have their say," he said.

Mr Butcher said implementing the committee's recommendations would be "a good starting point" but what was needed was an independent panel to impose "more accountability on the acquiring authority during the negotiation process."

Subsequent reports on the issue in the same paper revealed that the findings of this parliamentary committee were being kept secret by the NSW Government.

The only true and fair way of mitigating this social and health impact on affected residents is to cease all property acquisition processes until there is full release of the WestConnex business case and an independent analysis of the entire project, including this New M5 proposal, to be considered and independently verified. This must include a full socio-economic impact analysis that accounts for the true costs of the project and does not hide the costs borne by individuals if the New M5 project were to proceed.

Should the project stand up to this level of transparency and independent scrutiny, affected property owners must be offered just compensation for their losses, and be left in a position that is no worse off than they would have been had they not been forced from their homes or businesses for the toll road. This protection should also extend to rental tenants who live and/or run a business from an affected property.

5.5 Conclusion

WAG formally and strongly objects to the corruption of the planning processes surrounding WestConnex, including the New M5, and we ask that the Minister for Planning reject the WestConnex New M5 project.



6.0 Objection to the health impacts

WAG objects to the negative impact the WestConnex project, including the New M5, would have on the health of residents who live, work or study along the motorway's path, as well as drivers who use the tunnels and feeder roads.

WAG also objects to the human health risk assessment (HHRA) in this EIS on the grounds that so much of the air dispersion, traffic, noise, and vibration modelling assumptions or results upon which it is based are insufficient, poorly done, and/or unable to be verified. Unless the proponent can provide enough data and sufficient analysis to allow its assumptions in these areas to stand up to independent scrutiny, any areas of the EIS that relies on it – including the HHRA – should also be rejected, because the output of this modelling is pivotal data used by the HHRA. This is especially so for the traffic modelling and air dispersion modelling undertaken for the air quality impact assessment. Any deficiencies in the modelling, or change in predictions of pollutant air concentrations are likely to impact the HHRA, and may change the conclusions of the HHRA.

6.1 Expert views on likely health impacts

The health impacts of this project are likely to be severe. Professor Paul Torzillo, Executive Clinical Director of the Royal Prince Alfred Hospital in Sydney and a specialist in respiratory health, gave a presentation on the health risks of projects like WestConnex at a WAG public meeting in Newtown in 2015. He said (this has been edited to suit the context, but the full presentation can be seen online at https://www.youtube.com/watch?v=xjr5TEcEW-k):

"In cities like Sydney, traffic-based air pollution – which the scientists call TRAP, which I think is pretty prophetic – is a major contributor to total air pollution in the cities... it's about 30% of the total air pollution that cities like our experience. It's got two main components. The first is what comes out of exhaust emissions...Then there's a second component to TRAP, and that's road dust, fine particles from bitumen and rubber ware, and these two components contribute to this thing that they call "particulate matter"; that just means "stuff in the atmosphere". It's all small, some of it's really small and some of

it's really really small, and that gets absorbed into your lungs and into your body. All these things are bad for health.

"There's overwhelming international evidence now from organisations like WHO [World Health Organisation] that shows that that sort of pollution – if you look at what happens across big cities – it increases the number of heart attacks people have, strokes, it increases deaths from heart disease, deaths from respiratory disease, and there is some new evidence in the most recent WHO publication which says it probably impairs lung growth in children and it makes a contribution to diabetes, so these things on a population basis have a big impact on health.

"...these health effects occur both with long term exposure, and with repeated short term exposure. Again, the most recent WHO evidence suggests that repeated short term exposure has definitely got a health consequence. And the last thing that's important is there's no evidence about a "safe" lower level of any of these things. So less is better, but less isn't safe. So almost all the important agency reports talk about "mitigating health effects". The commonest word that you see in any of these reports is the word "mitigate".

"So what happens when you get a project like WestConnex? There have been lots of these around the world, what do they do? Well the first thing to know is that the levels of this sort of traffic air pollution are high around busy streets, and they're high probably for up half a kilometre each side – it depends on the topography and wind direction and various other things. Projects that involve tunnels redistribute traffic related pollution, so some places might be a bit better off, and other places might be worse off. So the tunnels themselves, the smoke stacks, the entrance points the exit point – all these places are likely to have higher levels, although you will see – and you will see on the website – it is hard to prove this because of a measurement problem that I'll talk to you about in a second. Importantly when traffic emerges from tunnels, surprisingly, it has to go somewhere. So it goes back on to roads, and when it goes to those roads, then those roads have higher use, higher traffic, higher pollution levels.

"For a whole host of reasons, it's incredibly hard to give a precise measure of how risky is it to live near a stack, near a tunnel entry or exit point, near a ventilation shaft, and

there's a whole lot for reasons for that. But that doesn't refute the fact that the overwhelming evidence is that this traffic related air pollution is bad for health.

"Now many people say – and you'll see this on the websites of every agency involved, that what should be done therefore is to monitor air quality. In fact agencies are very keen on this. But there are a lot of questions. The first is: how many of the components of some of the ones I mentioned are going to be managed? Do you measure them continuously or intermittently? How many monitors do you use? Where are they located? How does the public access this information?

"In a really big National Health and Medical Research Council review of tunnel related air pollution, the expert committee in their key summary said, and I quote, 'We'd like to comment on how difficult it was to obtain data about some Australian tunnels.' So if a federally funded, National Health and Medical Research Council with eminent scientists can't access the information, how easy is it going to be for us?

"The international experience with road projects such as these is that they encourage more traffic. There are more cars, and more people use them. This is bad for population health in Sydney, not just Newtown and St Peters. Traffic and roads have an impact on health. Aside from the ones I've mentioned, they reduce our ability to do a bit of walking or a bit of cycling, even as part of what your daily movement has to be. The big game in here is not monitoring, it's diverting these billions of dollars from these sorts of systems into safe and efficient public transport systems and that's what we should be concentrating on."

Professor Torzillo's comments are echoed by respiratory health experts around the world, including WHO, and make it clear that this project will worsen human health for not just those people who live, work or study along the project route, but also those who live, work or study within half a kilometre of its 'feeder' roads; drivers who use the WestConnex tunnels (particularly those who do so regularly and/or over long distances); and commuters who are locked into greater car dependency and long-distance commutes, rather than having access to healthier public or active transport options and/or employment, education or lifestyle opportunities closer to home.

6.2 Poor analysis of impacts due to tunnels and stacks

Sydney is about to face an unprecedented growth in road tunnel construction and use, including the WestConnex M4 East, this project, and the planned M4-M5 link.

All tunnels will use longitudinal ventilation systems (air in one end, out the other – through a stack). All polluted air produced in the tunnel travels along it, increasing in concentration all the time, until it reaches the exhaust point (the stack) close to the end of the tunnel.

These are probably the longest ventilation 'pathways' of any urban road tunnel in the world.

The longest ventilation pathway in a Sydney tunnel is the west end of the existing M5 East, which is about 5km in total length. This is the portion of the tunnel notorious for its extreme pollution.

There are longer tunnels overseas, but these are mostly in mountainous regions. And if they carry heavy traffic, they tend to either use transverse ventilation systems or have multiple stacks to reduce pollutant build-up along the length of the tunnel.

The Calle30 tunnel recently completed in Madrid is 40km long and carries up to 120000 vpd, however it has 30 ventilation stations (stacks), all of which are filtered.

The justification for these new tunnels is to speed-up the movement of goods and services across the city, so the potential impacts of the tunnels on regular users must be examined to ensure that they are safe and free from harm both to users and to the general public.

People living in the vicinity of tunnels and their stacks are entitled to be concerned about the likely impacts and they have been led to believe that 'monitoring' will be able to detect any harmful impacts. But as Prof Torzillo noted, the true question that should be asked is not 'will there be any measurable impact' but 'will the emissions cause me any harm'.

Commenting on the utility of monitoring, the NHMRC 2008 report observes: *"No clear evidence exists to show that monitoring such as that carried out to assess compliance with air-quality goals, especially for PM10, can reliably predict the size, nature and course of adverse health impacts."*

WAG is aware of reports from residents who live near the M5 East stack that monitoring failed to signal problems with pollutants even when residents could clearly smell the stack emissions; that many residents have reported health problems that began only

after the tunnel became operational; and that some have been forced to sell their homes and leave the area due to ill health.

Mark Curran, President of Residents Against Polluting Stacks (RAPS) and resident of Earlwood, provided this personal statement as part of his submission to this project:

I am sometimes asked why, after 15 years of campaigning about tunnels, I am still motivated to continue. The answer is fairly simple. Prior to the M5East stack starting operations, I, always the technological optimist, had assured my neighbours that all would be well and that there would be no impact from the stack.

I have an ineradicable memory of walking around streets in Undercliffe, close to the stack, soon after the tunnel opened and passing into and out of patches of air which stank of stack emissions.

Almost immediately I started getting reports of people getting ill, of people with controlled asthma reverting to an acute state, of people finding it impossible to tolerate the impacts and putting their houses up for sale.

All this occurred in an area which air quality modeling suggested there would be low but acceptable impacts of less than 0.5µg/m^3 PM10."

The calculations and modelling of impacts, be it of PM10 or PM2.5, as done in the EIS documents, are fundamentally misleading and claims made about the 'results' are disingenuous.

It is NOT scientifically valid to simply 'add' the tunnel PM10 and PM2.5 to the background as a predictor of adverse impacts because the tunnel exhaust is made up almost entirely of carcinogenic diesel emissions.

Experience with other tunnels in Sydney has not established a clear pattern of health impacts from the stacks, although it should be noted that both the tunnels built in the aftermath of the M5 East (the CCT and the Lane Cove Tunnel) were relatively short and had significantly over-designed and over-sized ventilation systems.

It is clear that the same cannot be said for the current tunnel designs which envisage relatively low ventilation volumes (in proportion to length) when compared to others.

The potential for a tunnel to cause harm exists both inside and outside the tunnel.

The NHMRC 2008 report on air quality in and around tunnels found that the pollution conditions inside some tunnels in Sydney were 'clearly dangerous to health' and noted specifically that 'Guideline values or health-based exposure limits should be developed

for the priority pollutants—including particulates and nitrogen dioxide—based on transit times through tunnels, and realistic estimates of total trip and daily exposure.'

In spite of the government setting up an 'Advisory Committee on Tunnel Air Quality' under the NSW Chief Scientist, these guideline values were not determined, nor is there any evidence that an attempt was made to do so.

As a consequence, the in-tunnel limit values in use are based on the PIARC (World Road Authority) design guidelines which, according to the latest version of the PIARC publication, assume that "a tunnel passage generally lasts for only a few minutes".

The extent of tunnel development in Sydney is such that it is certain that many tunnel passages, even under ideal conditions, will not fall into the category of 'a few minutes'.

One such trip would be that from Hornsby (or further north) to Port Botany, which would involve a total of about 24 km in tunnels and that from City-West link to Beverly Hills, which involves 16 km in tunnels.

Considering that most trips involve both directions, this means that some drivers will travel more than 50km in tunnels a day, trips which, even with moderate traffic congestion, could take over an hour.

As all major tunnel pollutants (carbon monoxide, nitrogen dioxide and particulate matter) have cumulative effects which take more than 24 hours to clear, the impacts of pollutants inside the tunnels will inevitably be harmful if the tunnels are operated under the PIARC guidelines.

This is a serious concern which has not been addressed in the assessment of health impacts.

The claims made in the EIS about improved tunnel design and the reduction of pollution levels, specifically the advantages of wider, larger tunnels, are disingenuous.

The larger internal volume does help to reduce local peaks of pollution, such as those occurring at a change of slope in the tunnel, but does not reduce the total exposure of motorists. This is entirely dependent on the time spent traversing the tunnel, the total quantity of pollution produced inside the tunnel and its rate of removal through the stack (which determines the concentration).

Although reducing the slope of up-grades in the tunnel does reduce the rate of pollutant emissions, especially for particulate matter, the overall improvement is not as great as is implied. In total, the existing M5 East tunnel has about 450m of 8% upgrade and 330 m

of 4%, so the improvement obtained by keeping grades under 4% is unlikely to be more than 10%.

The predictions of traffic volumes appear to be low (resulting in low predictions of emissions) and one is entitled to ask if such traffic volumes really justify the expense of building the tunnel.

In addition, the design of the ventilation systems depend entirely on the accuracy of predicted vehicle emission levels into the future, an assumption drawn into severe doubt by the recent scandals relating to the faking of vehicle emission tests and the apparent inability of modern vehicles to actually meet the required emission standards. On this basis, in-tunnel conditions are likely to vary from simply unpleasant to positively dangerous.

WAG also has significant concerns for the health and wellbeing of those forced to use the tunnels on a regular basis or as part of their employment. Because while harmful impacts from stack pollution do occur in the vicinity of poorly designed stacks such as the unfiltered ones proposed for this project, and they can be severe enough to force people to move away from the area, major harmful impacts occur inside the tunnel.

We agree with the observation made by the NHMRC in its 2008 report that, in relation to the vehicle pollutants nitrogen dioxide and particulate matter, *"the potential for harm appears to lie strongly on the side of particulate matter"*.

We are concerned that the EIS states the following in section 6.1 - In-tunnel air quality:

"The three pollutants assessed in-tunnel are nitrogen dioxide (NO2), carbon monoxide (CO) and particulate matter (PM). For the operating years of the WestConnex project, NO2 will be the pollutant that determines the required airflow and drives the design of ventilation for in-tunnel pollution."

The NSW Department of Planning and Environment issued a report that included discussion on this topic for the NorthConnex project in January 2015. From the Secretary's Environmental Assessment Report2 for the NorthConnex project: *"The Department considers that nitrogen dioxide (NO2) is now the key pollutant of concern for in-tunnel air quality. While carbon monoxide has historically been the basis for in-tunnel criteria in NSW and internationally, improvements in modern vehicle technology mean that NorthConnex will comply with existing health based carbon monoxide standards. By contrast, vehicle emissions of NO2 have fallen less quickly, and uptake of diesel vehicles (which produce more NO2 than petrol based vehicles) has risen."*



The position of the authors of the report and of the EPA relating to the relative importance of particulate matter and nitrogen dioxide is clearly at variance with the position of the NHMRC, which we regard as authoritative and a true representation of the current state of scientific and medical knowledge.

The air-flow in the M5East has been determined by the need to limit particulate matter for most of its operational life and we see little reason why this would be different in the proposed tunnel.

The much vaunted ‘Advisory Committee on Tunnel Air Quality’ was requested to resolve this problem and provide a proper mass concentration/exposure standard for particulate matter but failed to do so.

In the absence of this guidance, the operator appears to believe that there is no compelling reason to maintain particulate matter at demonstrably safe levels, levels which can be directly compared with the levels of pollutants quoted in medical literature.

The current predictions of in-tunnel levels show a number of scenarios where in-tunnel particulate matter concentrations are above 1000µg.m-3, a level noted by the NHMRC to be “clearly dangerous to health”.

Although large amounts of NOx (total oxides of nitrogen) are emitted in concentrated form from tunnels it seems unlikely that the impact of this will have a local effect, considering the time it takes for the relatively harmless nitrogen oxide to be converted to Nitrogen dioxide in the atmosphere.

The tunnel design proposed in this EIS does not represent a conscientious response to modern medical knowledge, nor to does it give proper consideration to health, wellbeing and general amenity of ordinary members of the public.

WAG also finds it disappointing that both the RMS and the tunnel proponents continue to deny the potential in these tunnels to use progressive in-tunnel filtration to alleviate adverse conditions, choosing to misrepresent the costs and the potential benefits of such systems.

When discussing the relative importance of nitrogen dioxide and particulate matter inside the tunnel, the NHMRC report noted that ‘the potential for harm appears to lie strongly on the side of PM’, a component which can be removed easily and economically by the use of electrostatic precipitator filtration.

WAG is aware that Leightons, one of the main construction contractor for this project, is installing “a state-of-the-art air purification system (APS) and tunnel ventilation system (TVS)” in its current tunnel project in Hong Kong, the 3.5 km Central Wanchai Bypass.

Leighton’s claim that “Hong Kong’s planners and our Leighton Asia JV have spared no effort to ensure the city’s latest major road and tunnel project leaves residents breathing easy”. If this system is good enough for Hong Kong and Madrid, then why is it not good enough for the residents of Sydney?

6.2.1 Accuracy of the estimation of particulate matter in tunnels and in stack emissions.

Motorway and tunnel construction in Sydney has occurred in several phases, with significant pauses between each phase.

Since the first major tunnel was built under Sydney Harbour there have been significant changes in the nature and quantity of vehicle emissions and in the guidelines adopted to limit the exposure of motorists and the general public.

	Opened	Lanes	V/day (aprox)	Length
Sydney Harbour	1992	2 x 2	90,000	2.8 km
Eastern Distributor	1999	2 x 3	130,000	1.7 km
M5 East	2001	2 x 2	110,000	4 km
Cross City	2005	2 x 2	? 35,000	2.1 km
Lane Cove	2007	2 x 2	? 70,000	3.6km

The reduction of carbon monoxide in vehicle exhaust (now about 12% of 1992 levels) has produced a massive decrease in the acute toxicity of tunnel air and the volume of air used to ventilate tunnels has been reduced accordingly.

The fact that other harmful exhaust components have not fallen proportionately has meant that they have actually increased as a proportion of the now reduced volume of vitiated air inside tunnels.

The actual performance of the tunnel ventilation systems in relation to motorist safety and comfort has been variable and in some cases is far from satisfactory.

The relatively short Eastern Distributor is moderately smoky and causes significant localised pollution around Palmer, Burke and William St.

The M5 East tunnel is notorious for its in-tunnel conditions drawing adverse comment from multiple health authorities. It has been noted that *"congested conditions in the west end of the westbound tunnel give rise to significant elevations in PM10 levels (sometimes to over 2000 µg m–3) for short periods."* NHMRC 2008

Both the Cross City and the Lane Cove tunnels have never had their ventilation systems 'stress tested' because their traffic volumes have never approached the design predictions.

The ventilation systems of the three most recently completed tunnels were built according to the PIARC (World Road Authority) guidelines for "Road tunnels: Emissions, Ventilation Environment" 1995 (variously updated)

It describes a method for estimating the total emissions of the various gaseous vehicle pollutants under various operating conditions.

Emission rates for 'turbidity' or smoke (which is not regarded as a health risk but as a nuisance limiting clear vision inside the tunnel) are also provided.

This document has been replaced by a further updated version (2012) which uses the same methodologies but updates some of the information including new emission rates for types of vehicles likely to be encountered into the future.

The varying degrees of success of the designs of Sydney's tunnels would lead a prudent person question whether these guidelines are, in fact, suitable for use as a design guide into the future.

Of greatest concern is the fact that even the latest document does not treat particulate matter or (more specifically) diesel exhaust as a health issue and does not allow for a determination of the components of particulate matter most implicated as the causes of health impacts such as cancer.



The calculation method is the basis for the estimation of the quantity of pollutants which will be emitted from tunnel stacks and is the crucial input required for all of the various air quality modelling which is carried out to determine likely adverse impacts on both tunnel users and on residents and workers surrounding the tunnel.

This approach does not provide any direct method for estimating particulate matter mass, nor does it allow for the direct estimation of nitrogen dioxide (as opposed to total oxides of nitrogen).

The estimation of nitrogen dioxide depends on assumptions about the rate of conversion of the nitrogen oxide component of total NOx into nitrogen dioxide.

For particulate matter, the guidelines provide a conversion factor to relate particulate matter concentration (as $mg.m^{-1}$ PM2.5) to observed light extinction (K in m^{-1}): *Diluted exhaust gas (tunnel): K = 0.0047μ.*

According to this relationship, the commonly quoted 'limit' to maintain acceptable visibility, $K=0.005m^{-1}$, is equivalent to a PM2.5 concentration of approximately $1000\mu g.m^{-3}$.

The EIS document notes the direct usage of this relationship: P 5-128 In-tunnel air quality design criteria.

"For measurements of visibility or in-tunnel haze, an extinction coefficient of 0.005m-1 based on the recommendations of PIARC for free flowing peak traffic travelling speeds of 50 to 100 kilometres per hour. Based on the correlation factor recommended by PIARC, this extinction coefficient is equivalent to an in-tunnel particulate matter concentration of 1.06 milligrams per cubic metre."

If this conversion factor is incorrect, then all of the air quality estimates are necessarily flawed, as are any assumptions or decisions based on them.

But soon after the M5 East tunnel opened, and long before it reached anywhere near its planned capacity, it was obvious that something was severely wrong and that smoke levels in the tunnel were unacceptable to users.

There were frequent reports of motorists suffering distress inside the tunnel and these reports were sufficiently consistent for the NSW Dept of Health to carry out a study of in-tunnel conditions.

It is worth noting that, so far as is known, the notoriously dysfunctional M5East tunnel has always operated well within the PIARC guidelines, including those for visibility.

As the Cross City tunnel was in the planning stage, it was necessary that this apparent anomaly was examined and its cause determined. What happened is best summarised by this transcribed extract from the EIS document for the Cross City Tunnel.

2.7 Extinction coefficient

Experience by RTA indicates that haze in the M5 East tunnel becomes unacceptable when the extinction coefficient, reported by the M5 East tunnel stack opacity monitor exceeds 0.003m^{-1}. Assuming that the particulate in the CCT will have similar properties to the M5 East tunnel, the relationship between extinction coefficient and PM10; concentrations can be applied to calculate an equivalent extinction coefficient in the CCT.

This relationship was derived from data measured in the M5 East tunnel as shown in Figure 3.

Figure 3. Correlation of extinction coefficient and PM10, concentration obtained from M5 East tunnel discharge stack data.

The relationship shown in Figure 3 differs from that defined by PIARC (1995). PIARC (1995) indicates that an extinction coefficient of 0005m^{-1} corresponds to a PM10, concentration of l000µg/m3. However, the same PM10, concentration in the M5 East tunnel suggests an extinction coefficient of 0.0025m^{-1}, i.e., approximately half that predicted by PIARC (1995). Unless stated otherwise, all extinction coefficients predicted in this report are based on the M5 East relationship shown in Figure 3. A discussion of the relationship between visibility and fine particles in tunnels is attached in Appendix A.

This conclusion was based on an analysis carried out by the environmental engineering firm Synergetics for the NSW RTA.

It is clear that the PIARC relationship between visibility and particulate matter concentration DID NOT HOLD UNDER THE CONDITIONS FOUND IN THE M5 TUNNEL and that the extinction coefficient to be used for the control inside the tunnel needed to be significantly less if acceptable conditions were to be maintained.

Logic would compel us to assume that it is at least possible that these conditions still exist and that a similar set of investigations would produce a similar result.

The actual methods used are summarised in section 9.4 ‘Particulate matter’ contained in the Stacey Agnew ‘Appendix L - Ventilation report’.

Although the discussion is both confused and largely circularly argued, it does, however, confirm that the PIARC method and the particulate matter conversion factor 4.7m^2/g is used as the basis its calculations for particulate matter.

The PIARC method ultimately determines the rate of particulate emissions from the values of visibility reduction (‘K’ or extinction factor) by summing the contributions of the various numbers and types of vehicles using the tunnel, each vehicle contributing to the total reduction in visibility.

Particulate emissions are calculated from this estimate by use of the conversion factor.

The factor is not an absolute measure like mass or length and there is no ‘theoretical’ or mathematical relationship between the entities.

Rather it is an empirical value which was determined by actual measurement in tunnels in Europe prior to the publication of the 1995 PIARC document.

There is no actual reason why it should remain constant and not vary over time or location or with changes in the composition of exhaust gases.

It is hardly surprising that it may vary under different conditions, due to variations in engine type and design, emission standards, variation in weather conditions and the various types of non- vehicle sourced particulate matter.

It should be a matter of serious concern that the PIARC conversion factor has been used in spite of the experimental evidence based on local conditions and experience, which demonstrate that it is, in fact, unsuitable and inaccurate.

This problem arises, at least in part, from the resistance by tunnel designers to treat particulate matter as a serious health risk and that this risk is best assessed based on an accurate measure of the gravimetric concentration of PM10 or, more importantly, PM2.5.

It is essential that the approach taken by the designers of the Cross City (and the Lane Cove) tunnel be adopted and that all relationships between visibility and gravimetric concentration be based on a locally determined empirical relationship.

A failure to do this could conceivably lead to significant underestimates of likely pollution quantities and concentrations inside the tunnel, which would have serious

consequences in a tunnel design which is already pushing the limits of established norms of tunnel ventilation design.

6.2.1 Poor analysis of filtration

According the EIS document (p4.5) community and stakeholder feedback identified the following issues as being of paramount concern:

- *In tunnel air quality, including consideration of filtration as part of ventilation systems*
- *Location of ventilation outlets. Feedback from the community suggested positioning ventilation outlets within industrial areas was preferred*

Given this clearly expressed concern, which is not unique to this project, the cursory way in which the proponents have addressed the issue of filtration shows a disregard of the views and desires of the public, especially considering that the company which is to build the tunnel is intending to install a complex filtration system in the tunnel which it is currently constructing in Hong Kong.

The public is at least entitled to expect that the current capabilities of filtration equipment are accurately reported and discussed and that some evidence be given that the potential use of filtration has been considered and not rejected out of hand.

The comments, conclusions and claims made in the executive summary of the technical paper relating to air quality about the possible utility of ‘filtration’, its cost, usage, operational efficiency and cost cannot go unchallenged.

Many of the claims and assessments made are either incorrect, tendentiously reported or show a misunderstanding of modern usage.

The EIS states at pp xxi - xxii Filtration

“The provision of a tunnel filtration system does not represent a feasible and reasonable mitigation measure and is not being proposed. The reasons for this are as follows:

- *The project’s in-tunnel air pollutant levels, which are comparable to best practice and accepted elsewhere in Australia and throughout the world, will be achieved without filtration*

In fact the comparison is with the PIARC norms which are not claimed to be “best practice” but rather to an attempt at defining “the minimum air requirement that is required to ensure adequate in-tunnel air quality and visibility thresholds”

The in-tunnel air pollution levels are not ‘accepted in Australia’ by tunnel users. Although the M5East tunnel meets the PIARC criteria, the NHMRC (2008) report notes that *“current levels of PM in some tunnels in Australia (ie the M5East) are in excess of 1000 µg m^{-3} which is clearly dangerous to health.”*

It is WAG’s belief that the current ‘allowable’ pollution levels, especially for particulate matter in the presence of nitrogen dioxide, are not adequate to protect the health and comfort of tunnel users.

The EIS also states that:

- *Emissions from the ventilation outlets of the project tunnel will have a negligible impact on existing ambient pollutant concentrations*

This may well be true in the sense that they are not able to be detected by the methods in use supposedly to monitor them but in the past, local impacts from stacks such as the M5East stack at Turrella have caused severe distress to sensitive individuals, in spite of the fact that no impact of pollutants could be detected in the immediately adjacent monitoring station, which was specifically located to attempt to detect such impacts

The NHMRC 2008 report notes *'No clear evidence exists to show that monitoring such as that carried out to assess compliance with air-quality goals, especially for PM10, can reliably predict the size, nature and course of adverse health impacts.’*

The EIS also claims that:

- *Of the systems that have been installed, the majority have subsequently been switched off or are currently being operated infrequently*

It is hard to see this comment as other than an attempt to mislead as exactly the same comment could be made about the jet fans in the tunnel. In any sensible system, equipment is not operated when it is not needed. If the systems are operated infrequently then they are presumably operated as they are needed. The history of the development and use of electrostatic precipitator equipment is long and complicated and cannot be summarized as is attempted here.

Similar can be said of this statement from the EIS:

- *Incorporating filtration in the ventilation outlets would require a significant increase in the size of the tunnel facilities to accommodate the equipment. It would result in increased project size, community footprint, and capital cost. The energy usage would be substantial and does not represent a sustainable approach.*

This is misleading as it implies that filtration in the ventilation outlets would be the appropriate way to deploy such equipment. The problem likely to occur in this tunnel is excessive particulate matter concentrations inside the tunnel (and high cost relating to increased air volumes required to clear it). The most appropriate way to deal with this is by the use of progressive in-tunnel filtration.

The size of the installation depends on the way in which the equipment is deployed. Equipment suitable for use in an exceptionally long tunnel such as the proposed M5 duplication could be installed above the carriage-way in an enlarged fan niche

The cost of both installation and operation of filtration has been vastly and irresponsibly overstated. The going price, world wide for electrostatic precipitator equipment supplied and installed is around $A2-3 million per 100$m^3$/sec treated. Energy consumption excluding fans is about 1.5kW per 100m^3/sec treated.

The EIS also states that:

- *If compliance with in-tunnel air quality limits cannot be achieved with the proposed ventilation system, the most effective solution will be the introduction of additional ventilation outlets and additional air supply locations. This is a proven solution and more sustainable and reliable than tunnel filtration systems.*

The addition of extra ventilation outlets introduces new issues of external impacts and community resistance. Additional air supply does little to alleviate the problem as no pollutant is removed from the tunnel by this alone.

And it is hardly a “proven solution”. The proposed tunnel is exceptionally long for an urban, heavy traffic tunnel and is aiming to use a ventilation technique untested on this scale. The countries with most experience with tunnel filtration (Japan and Norway) both claim that progressive in-tunnel filtration has the capacity to reduce the cost of ventilation. In addition it has the capacity to reduce the exposure of drivers to pollution. Reliability is not an issue in properly designed and maintained equipment.

The proposed tunnel is exceptionally long and will carry a relatively heavy load of medium and large trucks. The intention of the operators to depend on basically passive ventilation systems is of concern as, so far as we are aware this system has not been used on this scale anywhere else.

6.2 Failure to meet SEARS

There are several areas in which the HHRA either does not meet the Secretary's Environmental Assessment Requirements (SEARs) related to human health, or it is unclear whether relevant SEARS have been adequately addressed.

- How the design, e.g. relative to other design options, minimises adverse health impacts is unclear.
- There is no specific reference to how the design, or as yet unconfirmed mitigation measures, minimises adverse health impacts.
- It is difficult to objectively assess how the design of the tunnel minimises adverse health impacts.

Given the proposed scale and longevity of the WestConnex project, including the New M5, additional detail for how the chosen project design, relative to other options, minimises adverse health impacts should have been included in this EIS.

6.3 Issues with the HHRA

There are a number of areas in which the HHRA fails to consider significant health impacts and risks associated with the New M5 project, and therefore cannot be considered fit for purpose.

6.3.1 Failure to assess impact of filtering ventilation stacks

Air quality (and resulting health impacts) once the tunnels are in operation was not assessed with the inclusion of filtration, or other pollutant reduction measures, in the tunnel exhaust stacks. As a result, the potential benefit to human health of including filtration has not been objectively assessed.

In addition to providing potential physical and clinical benefits from reducing pollution exposure, there are psychological health benefits that should also be taken into consideration when evaluating the worth of installing pollution abatement measures in the stacks.

Furthermore, the Protection of the Environment Operations Act 1997 of NSW (1997) states that, amongst its objectives, are: “to protect, restore and enhance the quality of the environment in New South Wales, having regard to the need to maintain ecologically sustainable development”, and “to reduce risks to human health and prevent the degradation of the environment by the use of mechanisms that promote the...making of progressive environmental improvements, including the reduction of pollution at source.”

Omission of in-stack pollution reduction measures in the air quality and HHRA considerations of the HHRA is not consistent with the policy objectives of the Protection of the Environment Operations Act 1997 of NSW. It is not appropriate to use logic that relies on existing bad (and non-compliant) air quality, and the attending health risks not getting any worse to justify the project or not evaluating the inclusion of pollution abatement equipment.

6.3.2 Over-reliance on vehicle emission exhaust data

Given the recent revelation of vehicle manufacturers to significantly (perhaps by as much as 50%) understate pollutant emissions, WAG questions whether vehicle exhaust data used in the dispersion modelling to predict levels of community exposure are sufficiently robust to provide an accurate estimation of exposure.

6.3.3 Compliance vs risk assessment

Health effects of all other compounds chosen for assessment have been evaluated largely by compliance with air quality guidelines. Such a screening compliance assessment does not necessarily evaluate the actual risks or impacts to health. It is not sufficient or appropriate for a project of this scale.

Other serious concerns regarding the method of assessment used to evaluate risks and impacts to human health in the HHRA include:

- The justification for choosing the guidelines is not in the HHRA. For a project of this scale, it would be expected that a detailed explanation of the data underpinning the guideline value and why it is appropriate for judging the health effects (and not only compliance with a guideline) to people be provided. Included should be a scholarly exposure-response assessment (i.e. the effects that a substance may cause at exposure concentrations other than the effect used to set the guideline). The EIS should have included appropriate justification for choosing a guideline over a different one. A scholarly justification should also have been provided for the selection of the guidelines used in the HHRA with regards to what health effects are associated with a substance and how the guidelines are protective of acute and chronic health effects.
- For a number of the pollutants that may be in stack emissions, the averaging times of the guideline may not be pertinent for assessing short term health impacts – particularly for the assessment of eye and respiratory tract irritation from exposure to individual substances, and as a mixture. For example, acetaldehyde and formaldehyde were assessed against 1-hour guideline values derived by different states in the USA, but elicitation of sensory irritation can occur with very brief exposure, i.e. within 5-10 minutes (NHMRC 2006). Even though the irritation may be relatively mild, manifested as itchy eyes or a tingling nose, it can affect general amenity and wellbeing if it happens often and in conjunction with odour (see below). In this situation the effect should be considered adverse (NHMRC 2006). The risk of sensory irritation be assessed for all relevant compounds, and as a mixture.
- Missing from the HHRA is a serious evaluation for odour impacts. Repeated, unwanted odour can have significant bearing on the amenity of communities. It is well recognised that the health effects associated with malodour or unwanted odour are not of a clear toxicological nature but are an effect on wellbeing and include such non-specific symptoms such as headache, mental fatigue, stress and perceived irritation (NZ MfE 2002, TCEQ 2015). Providing the air concentration of odour is sufficient, only very short exposure times are required to experience an odour event, in the order of a few seconds. The assessment is deficient in that biologically relevant exposure concentrations (brief exposures to peak concentrations) of mixtures of air pollutants have not been considered. Odour impacts be assessed for the mixture of relevant compounds.

- Also missing from the HHRA is consideration of elicitation of an asthma response that does not necessarily requiring a visit to a hospital emergency department. A wide range of other health effects and health measures including mortality for different age groups, chronic bronchitis, medication use by adults and children with asthma, respiratory symptoms including cough, restricted work days, work days lost, school absence, and restricted activity days have also been associated with PM exposure. The report indicates while these associations have been identified the exposure-response relationships established are not as strong as those used in the assessment for quantitative evaluation. The available baseline data do not include information for many of these health effects, making it impossible to undertake a quantitative assessment. Other indicators of acute health effects to PM (i.e. <24 hours in duration) than hospitalisation or respiratory mortality should have been considered as part of this EIS, because substantially more persons are likely to be affected (NHMRC 2006). Notwithstanding that the health impacts from PM have apparently been agreed in consultation with the NSW Department of Health, we believe such consultation established the minimum health effects that should be examined, and should not limit health risk assessment to only those 'agreed' effects. This could be done by acknowledging that exposure to PM (and NO2) should be somewhat less than the 24-hour guideline. The assessment for PM should include effects other than hospitalisation prevalence and mortality for shorter-term exposures.

6.3.4 Choice of chemicals included in HHRA

Not all pollutants relevant for assessing the impact of tunnel emissions have been included in the HHRA, or have been reasonably/objectively dismissed as having possible negligible impact.

For example the Australian Motor Vehicle Emission Inventory for the National Pollutant Inventory (NPI) (Smit 2014) lists 116 pollutants, included are metals and 14 carbonyl compounds. However the HHRA does not consider metals at all, and only two carbonyls (acetaldehyde and formaldehyde) are included. Of note is the inventory does not include the wear release of compounds entrained within tyres and brake pads that become resuspended in air and emitted from the tunnel stacks. Various authors (e.g. Sternbeck et al. 2002, Lough et al. 2005, Grigoratos and Martini 2015) have found brake wear to be a major emission pathway for some metals. A consensus statement from an international workshop held in June 2011 concluded that wear-related PM emissions that contain high concentrations of metals may (despite their limited

contribution to mass of non-exhaust emissions) cause significant health risks for the population, especially those living near intensely trafficked locations (Denier van der Gon et al. 2012).

6.3.5 High-rise exposure

There is no discussion in the HHRA regarding the potentially different exposure profile for people who may be living above ground in medium-to high-rise apartments. The air quality modelling has projected ground level concentrations. Current and future development of the area with more people inhabiting apartment buildings could affect the exposure profile for this sector of the population, particularly if windows are open to allow air flow through the apartments. This is particularly significant given the large numbers of people who already live in such developments along the route, and plans for thousands of new dwellings in medium-to-high-rise apartments along or near the project route. The HHRA in this EIS cannot be considered fit for purpose unless it considers how exposure and resulting risk profile for people living above-ground level in apartment buildings may be different from that discussed in the HHRA.

6.2.6 Lack of quantitative assessment of construction scenarios

Quantitative assessment of construction scenarios and lay-down areas has not been undertaken in the HHRA. The question arises how the construction management plan will ensure negligible health effects from potential dust impacts on nearby residents. For example drilling and grinding sandstone or other hard rock creates small biologically active silica particulates which have carcinogenic potential (QLD WH&S 2009, Safe Work 2013). Public exposure to these particulates has not been considered in the HHRA.

As a result, the EIS contains no details as to how public exposure to such substances is to be minimised or preferably avoided entirely throughout the construction process if the project proceeds. Such conditions should include, at a minimum, requirement for measurement of respirable crystalline silica and adherence at the construction boundary to the Victorian ambient air standard (VIC EPA 2007) of 3 µg/m3 as PM2.5 (as NSW does not have an equivalent criteria); installation of vehicle washes, especially wheel

washes, before leaving construction areas and entering public roads; and a minimum moisture content of trucked spoil of 10%.

6.2.7 Averaging time used for calculation of incremental risk of NO2 and PM

The calculation of incremental change in individual risk from modelled change in NO2 and PM concentrations has been undertaken in the HHRA using several short-term and long-term health endpoints. Many of the concentration-response functions from the literature which have been used in the HHRA are related to a daily maximum concentration (for NO2) or daily average concentration (for PM). However, the HHRA has used a change in annual average NO2 and PM for assessment against the short-term health endpoints. This is inappropriate, and is likely to be diluting the exposure and therefore the estimation of potential risk.

6.2.8 In-tunnel health risk assessment

The modelled in-tunnel concentration data are provided as maximum 1-hour average concentrations. However, the in-tunnel criteria which are used to judge the potential for health impacts are related to shorter averaging times. Comparing the two is inappropriate. In addition, the HHRA states the ventilation system in the tunnel has been designed so as not to exceed the in-tunnel criteria. However for NO2, it is clearly evident that the in-tunnel criteria would be exceeded, since there are instances where the modelled maximum 1- hour average already exceeds the 15-minute criteria chosen as the guideline for HHRA.

The HHRA rightly concludes there may be a health risk for people who travel through the tunnel. The advice for management of this risk to asthmatics is to keep windows up and air conditioning on recirculation. This management approach is inadequate, as it does not protect motorcyclists or other people not travelling in fully enclosed vehicles. Perhaps more importantly, the first point of exposure management should be improving the tunnel design and engineering controls to minimise exposure by reducing pollutant concentrations in the first place.

An ‘in-tunnel’ worst-case exposure scenario that addresses ventilation decrease, or failure, has not been included in the HHRA. It is also noted that NSW Health

commented in their requirements that in-tunnel exposures for vehicle occupants and motorcyclists be assessed, and that the assessment should include consideration of all reasonable and feasible mitigation measures. An objective assessment of all feasible mitigation measures does not seem to have been provided.

6.2.9 Combining suburbs

In relation to health impacts, various suburbs have been combined and reported as one area without any explanation as to why this is the case provided in either the Appendix or the rest of the HHRA - for example, Marrickville, Sydenham and Petersham. St Peters is one of most impacted suburbs, but it has not been separately assessed in this EIS with respect to health impacts, though it contains areas from the dispersion modelling with higher concentrations. Again, no explanation has been provided for this decision.

These unexplained and, in WAG's opinion, unjustifiable decisions are likely to obscure the potential health impact to the project area as a whole, and on individual suburbs – particularly the ones that are likely to be the most heavily impacted by the New M5.

6.3 Conclusion

WAG formally and strongly objects to both the health impacts of the WestConnex including the New M5, and to the way in which this HHRA has been conducted. We ask the Minister for Planning to reject the WestConnex New M5 project.



7.0 Objection to the impact on air quality and EIS assessment of impact

WAG objects to both the impact WestConnex, including the New M5, will have on Sydney's air quality, and the failure of this EIS to properly assess those impacts.

The air quality assessment in this EIS relies too heavily on the WestConnex Road Traffic Model (WRTM) forecast.

In what should have been an independent study, the air quality assessment needed to model a fuller range of traffic scenarios for the corridor, including possible "rat runs" used to avoid tolls and thus changing the air quality at those points.

The fact that the project corridor has numerous traffic "hot spots", where levels of dangerous pollutants are already elevated, is glossed over, and the dangers of adding to these "hot spots" and creating more of them is not taken into account by the overly conservative induced traffic forecasts.

There has been no comparison between the project and other cleaner forms of transport.

The air quality assessment makes no mention of the possibility of phasing out diesel fuel passenger vehicles as one way of assisting with the problem of elevated levels of PM2.5 and NO2 in the corridor.

The air quality assessment also fails to comply with the project SEARS in a number of instances, as well as failing to provide enough data to adequately assess compliance with some SEARS.

Particle pollution levels along the proposed WestConnex route are already at or above current standards, and well above proposed standards. This is also true of coarse particle (PM10) pollution levels.

Particle pollution levels near the proposed project already exceed the current PM10 and PM2.5 standards. Construction and operation of WestConnex will increase pollution concentrations and adverse health impacts.

Rather than building more mega-toll road projects like WestConnex that will only add to these levels, the NSW Government should be acting to prevent any additional sources of fine particle pollution and to actively manage existing polluters.

In 2014, the OECD published a study showing that of 34 countries in the OECD, 20 saw their pollution-related deaths decline in that five-year period. Australia was in the minority of 14 countries that saw their death rates increase. As mentioned in section 6.1 of this submission, Professor Paul Torzillo explained at a WAG public meeting in Newtown that health risks do increase for those living near congested road. The EIS for the New M5 reveals that in St Peters, Alexandria and Kinggrove hundreds of residents are already exposed to high levels of Fine Particle Pollution 2,5. and will be exposed to higher levels.

7.1 Flaws in the methodology of the EIS report

- The air quality assessment relies upon the validity of the traffic modelling assessment. If the traffic modelling assessment has under estimated traffic volumes or has incorrectly characterised traffic volumes, it is possible that the air pollutant levels may also have been incorrectly characterised. As outlined in Section 4.0 of this submission, it is very likely that the traffic forecasts in this EIS are incorrect, which would render this air quality assessment incorrect as well.
- The estimates for “induced demand” in traffic are very conservative, given they rely on population forecasts which may underestimate population growth along the corridor.
- Data reported against the current standard of 25ug/m3 (24-hour average) does not give an accurate picture of the peak hour traffic emissions, which would be well above the standard; the fact that children are walking to school near several of these sites in the morning peak hour means they are being daily exposed to dangerous emission levels. If their classrooms are also located near the sites with elevated emissions, they are exposed for lengthy periods.
- The community receptors used to indicate changes to emission levels at 2021 and 2031 already show levels of PM2.5 are above the new NEPM standard. If the WestConnex project induces more traffic to the area by 2031 (or the population grows

faster than planned or more diesel vehicles use the road or tunnel) then PM2.5 levels will be well over the current standard, let alone the new standard.

- The planned height of the ventilation stacks is not modelled to show other scenarios, including effects of greater heights on dispersal of pollutants; there is a lot of international research that indicates a greater height of stack results in better dispersion.
- The air quality assessment seems to downplay the key findings from the Human Health Risk Assessment.
- The claim there will be no emissions from portal sites is highly questionable, given that any congestion on the feeder road into a portal entrance or the exit point will produce concentrated sites of emissions
- The GRAL dispersion model has been adopted in the air quality assessment for surface roads and for the ventilation outlet. The GRAL model was designed principally to model emissions from surface roads and tunnel portals in complex urban environments. Whilst the model has the capability to model emissions from ventilation outlets, other models such as CALPUFF are more often used. The GRAL model has certain limitations relative to CALPUFF, for example in relation to the characterisation of the temperature of the plume.
- Insufficient information has been provided to enable a detailed review of the model inputs.
- The air quality assessment has not predicted concentrations of air pollutants on elevated receptors. Experience elsewhere shows that higher concentrations of air pollutants will be experienced by receptors that are elevated above the ground when emissions occur from an elevated emission source. For example, the upper floors of a multi-storey building may receive higher concentrations of air pollutants from a stack or vent than are experienced at ground level. No justification is provided for this omission, which is particularly significant given the number of multi-storey buildings that already exist in the area, and the high number of medium-to-high rise developments planned. Consequently, the air quality assessment may have under-predicted concentrations of air pollutants on the upper floors of multi-storey apartments. The air quality assessment makes no mention of any plans to re-assess concentrations of air pollutants on the facades of any existing or possible future multi-storey buildings in the vicinity of the ventilation stacks.
- The air quality assessment has not quantified emissions or ground-level concentrations of all air pollutants that may be associated with motor vehicles. For

example, metals associated with the project. WAG notes that the NSW EPA's 2008 Air Emissions Inventory for the Greater Metropolitan Region in New South Wales includes a range of metals from motor vehicles. There are a range of other air pollutants that are emitted from motor vehicles including metals, sulphur dioxide and volatile organic compounds. While these excluded air pollutants will not be critical in an assessment against air quality criteria, they may be an important consideration in the human health risk assessment, which relies on this air quality assessment.

- The air quality assessment has provided data only for the averaging times that are relevant for the regulatory assessment against air quality criteria. However, model predictions of short-term periods is required for the Human Health Risk Assessment (HHRA) in this EIS. This omission seriously compromises both the air quality assessment and HHRA in this report, both of which are critical to the overall validity (or lack thereof) of this entire EIS.
- The air pollutant emission rates applied in the dispersion model appear to have been averaged through each day. If this is correct, peak 1-hour average ground-level concentrations of air pollutants are likely to have been underestimated. This will have implications for the regulatory assessment of nitrogen dioxide and other air pollutants that have criteria averaged over 1 hour. This will also have implications for the Human Health Risk Assessment.
- The air quality assessment has not provided predicted ground-level concentrations of air pollutants due to the ventilation outlets in isolation of the surface roads and regional background levels of air pollutants. This information is relevant to understanding the potential impacts of the project, whether filtration of ventilated air is required and its potential benefit.
- There is a lack of a quantitative assessment of air quality impacts from the construction phase of the project. The New M5 EIS has adopted a semi-quantitative approach to assess construction impacts on air quality. The air quality assessment has not quantitatively assessed emissions and potential impacts of air pollutants from the project during construction. WAG does not consider it acceptable that such a significant risk to residents' and workers' health and safety risks being compromised by the proponent's failure to assess this as part of the EIS.
- There is a lack of information in the air quality assessment regarding monitoring (both ambient and in-tunnel) during the operation of the New M5 Project.
- While the air quality assessment makes some attempt to identify the pollutant exposure for the New M5 journey (even though this is not complete when it comes

to factors such as the types of pollutants measured), no attempt is made to measure either the levels or impact of cumulative exposure for people who would remain in tunnels for longer journeys if the remaining WestConnex tunnels are built, or for journeys that would include other existing or planned road tunnels.

7.2 Flaws in model's assumptions

The benefits from the project, in terms of some reduced pollutant concentrations at particular points depend on completion of stage 3 of WestConnex and other unplanned toll road projects, which may not eventuate if tolling of stage 1 and this project do not meet estimated revenue. If stage 3 is not completed, the levels of PM2.5 throughout many parts of the route will exceed current advisory and new standards.

The overall benefits rely on the WRTM traffic model being accurate. Traffic forecasting is a major issue in Australia, given the number of projects with significantly incorrect forecasts of volume, including the Brisbane N-S By-Pass, Sydney Cross City Tunnel, Brisbane Connections, Lane Cove Tunnel and East-Link Melbourne. As the Australian Bureau of Transport and Communication Economics, Canberra states, traffic models are … "radical simplifications of real urban systems" (cited in Black, J (2014) Traffic Risk in the Australian Toll Road Sector, Public Infrastructure Bulletin, Vol 1, Issue 9, Art 3). So all the claims of improvements in overall air quality, or at best negligible impacts on air quality, are reliant on the accuracy of the traffic modelling.

As Black (ib id, p5) shows, the eight most recently built toll-roads in Australia have all had significant underestimation of traffic volumes by an average ratio of .48 (total traffic from the 8 projects forecast as 945,286 vehicles, but actual volume was 455,939 vehicles). The proponent must be very optimistic that this project will be the first one in many years to get the traffic forecasts correct. The problem is that local residents' lives are about to be severely interrupted and possibly have the air quality worsened if this project attracts more traffic than estimated onto the surface roads.

Following a review of local and international reports and data, the Australian Department of Infrastructure and Transport, Bureau of Transport and Regional Economics (BITRE) in its Review of Traffic Forecasting Performance Toll Roads (2011) sets out what it sees as the major sources of errors in toll road forecasting. These errors

include both technical (inadequate models, data limitations, unrealistic model input assumptions and ramp-up risk) and non-technical (optimism bias and strategic misrepresentation) sources of errors. The robustness of the WRTM model is crucial to the claims that the air quality will not be adversely affected by the project, and this air quality assessment should have included a worst-case scenario of more than projected traffic, particularly given the series flaws in this EIS's traffic modelling as detailed elsewhere in this submission.

The air quality assessment appears to ignore key actions recommended in the new National Clean Air Act, including initiatives to reduce localised emissions. The WestConnex project will not only increase levels of NO2 and PM2.5 at several community receptors, it also runs the risk (if estimated traffic flows are greater than predicted) of increasing these levels across the Corridor. This project will not be futureproofing Sydney.

Even if we accept the assertion in the EIS that the exhaust ventilation tunnel will for the most part allow for reasonable distribution of pollutants away from the immediate vicinity (which WAG does not), several issues of concern remain. For example, what would be the impact of intense localised plume strikes onto small areas, which will cause often short, but quite intense concentrations of pollutants in a restricted area, due to changes in wind patterns or atmospheric inversion layers? These acute events can be a major trigger for acute asthma episodes or people with other chronic lung conditions.

With regard to in-tunnel air quality monitoring, the air quality assessment states the ventilation system would be automatically controlled using real-time traffic data covering both traffic mix and speed, and feedback from air quality sensors in the tunnel, to ensure in-tunnel conditions are managed effectively in accordance with the agreed criteria. The air quality assessment does not specify the pollutants to be monitored, the method of monitoring, nor the location. This is a disturbing omission given that so much of WestConnex, including this New M5, is made of tunnels that drivers may end up spending extended periods of time in.

The proponents allege that WestConnex will improve air quality. This beggars belief. Building and expanding motorways increases air pollution, as motorways induce traffic.

The EIS assumes an increase in vehicle kilometres travelled (VKT) in the WestConnex domain. Increasing road capacity will directly increase VKT. As a result, air pollution worsens.

Across Sydney, ambient concentrations of PM2.5 and PM10 are increasing. This compels the NSW Government to act to improve air quality and take all available measures to reduce particle emissions.

The prediction that constructing WestConnex can reduce emissions is based in part on the assumption that the motorway will ensure that traffic moves faster and more freely. In reality, many motorways become congested more rapidly than expected, due in part to induced traffic.

7.3 Conclusion

WAG formally and strongly objects to both the air quality impacts of the WestConnex including the New M5, and to the way in which this air quality assessment has been conducted. We ask the Minister for Planning to reject the WestConnex New M5 project.



8.0 Objection to the impact of WestConnex, including the New M5, on climate change

WAG objects to the increase in emissions WestConnex, including the New M5, will cause, and the worsening of climate change that will result. WAG fundamentally rejects the proponents' allegation that WestConnex will improve air quality and reduce emissions.

This beggars belief. Building and expanding motorways increases air pollution, as motorways induce traffic. No credible authority in the world today would suggest that building motorways is the solution to cutting national greenhouse emissions.

The EIS assumes an increase in vehicle kilometres travelled (VKT) in the WestConnex domain. Increasing road capacity will directly increase VKT. As a result, air pollution worsens.

The EIS calculates the vehicle kilometres travelled (VKT) for light vehicle traffic (cars, vans and motorbikes) and heavy vehicles (trucks and buses) will increase if WestConnex is built compared with if it was not built.

The EIS also provides calculations made about vehicle types, their fuel consumption and their speed and concludes that, despite these massive increases in VKT, there will be a *decrease* in overall fuel use.

These predications of lower fuel use thanks to WestConnex underscores the proponent's claims that vehicle greenhouse emissions will be lower with WestConnex than without it. The EIS predicts that PM2.5 emissions in the WestConnex domain will decrease by while VKT increases.

The proponent alleges that because traffic will be flowing freely rather than stuck in a jam, less fuel will be used. This argument has been thoroughly discredited for years. What matters is VKT. Higher VKT means higher greenhouse emissions.



WAG formally and strongly objects to the increase in greenhouse gas emissions and the worsening of climate change that will result if the WestConnex, including the New M5, is built. We ask the Minister for Planning to reject the WestConnex New M5 project.



9.0 Objection to the impact of noise and vibration caused by WestConnex, and failure of the EIS to properly analyse these impacts

WAG objects to the both the long and short-term impact that increases in noise and vibration will have on the lives of the hundreds of thousands of people who currently live, work or study in or near the route of the planned WestConnex, including the New M5. We also object to the poor analysis of these impacts in the New M5 EIS.

Noise could have a long-term impact on those who would live beside the proposed New M5, as well as in local streets and roads carrying extra traffic nearer tunnel exits and on 'rat runs'. Construction noise from demolition, thousands of truck movements a day and rock crushers would impact heavily on local communities and businesses. In some situations this could occur for several years. In others, the impact would be over shorter periods. Research has shown that noise does have negative effects on health. Vibration from construction including tunnelling could cause cracked walls. The proponent has already begun warning residents of this risk.

The EIS does recommend noise mitigation for some buildings, although only up to the first story. It recommends noise walls and other strategies that would reduce the noise.

The EIS provides no justification for not treating residential buildings exposed to road traffic noise greater than two (2) storeys in height. It provides no information regarding cumulative noise impacts from surface and underground tunnelling construction activities, or justification for not addressing construction noise at properties greater than single storey. Assessing such impacts were outlined in the SEARS for this project. On this basis alone, these findings in the EIS should be rejected.

There are many gaps in the EIS when it comes to assessing these impacts, and much is also left to future decision making during the final design phase.

Even the way the EIS reports are presented make it difficult for residents to see whether their neighbourhoods would be affected by excessive noise levels or not. While it's expected that technical data can be hard to understand, the summary chapter should be presented in a more accessible way. It is not. Even so, it is clear that the EIS shows hundreds of homes and thousands of residents would be affected by noise either during both the three-year construction period and after the New M5 is opened if it is built.



There are many issues in this EIS that need to be redone before any Planning approval should be granted. It is not acceptable that, given the uncertainty raised in a range of areas of the noise and vibration assessment, and the number of potentially impacted properties and people within the project area, the local community and other affected stakeholders have not been provided with the information they need to make a fully informed assessment. This must occur as part of the EIS consultation process where further comment can be sought from the community, and not simply resolved through the Submissions Report that does not allow any further community input.

Noise monitoring results and assessment

The noise monitoring results in Appendix J, Section 3.4, Table 12 show that two days of the background noise monitoring was undertaken within the St Peters/Tempe area after the start of summer school holidays, which would have had an impact on the recorded results, as traffic is generally lighter during school holidays.

Some of the noise predictions contained within various tables of Appendix J show median LAeq and maximum LAeq results as the same or very close numerical value. Given a median should be the midpoint value and the maximum should be the highest value it is not clear why they would be the same or one dBA different. For example, Table 56 shows a median LAeq of 44 and a maximum LAeq of 44 for NCA10. This information in Appendix J should be reviewed to ensure that the information has been correctly calculated as it forms part of the overall noise modelling for the proposal.

Maximum noise assessment

Section 6.1.12 of App J presents results for a maximum noise assessment undertaken for a seven day period at one location in Beverly Hills and one location in St Peters. Two nights of the results for St Peters were excluded due to rain, which equates to almost 30% of the results not being useable. This is too significant a gap to be able to have confidence in the conclusions that have been reached on the basis of these results. This is particularly concerning given the EIS acknowledges that the St Peters area is already subject to a large number of maximum noise events and that this will increase due to the project.

The maximum noise assessment must also contain consideration of maximum noise events due to aircraft as well as road traffic. While the maximum noise monitoring results would have picked up aircraft noise occurring at the time of the monitoring, there is no discussion of the cumulative impact of current and future road and aircraft noise.

Construction noise management levels

There is at least one inaccuracy in the calculation of the Noise Management Levels (NMLs) between Table 12-2 and Table 12-4 as the RBLs given in Table 12-2 for Noise Monitoring Location (NL) 02 and for Noise Catchment Areas (NCA) 02, 03 and 06 in Table 12-4 differ when they should be the same. This in turn means that not all of the construction NMLs that are given are accurate.

This section needs to be reviewed for any further errors by the Proponent so that the community can be provided with accurate information.

Construction noise impacts

Tables 12-17 to 12-29 show that there will be large numbers of receivers that would be highly noise affected during standard hours construction works along the alignment and Table 12-30 to 12-39 show that very large numbers that would be affected during out of hours works, with correspondingly high numbers of receivers that would be exposed to sleep disturbance, particularly for local roads upgrades around Alexandria Canal. Given the construction program in Chapter 6 of the EIS indicates that these works could continue for more than two years, this is an unreasonable burden to place on the community when the resulting project will also leave these receivers highly impacted and when better transport solutions could be found.

Page 12-60 states that "…*no activities would occur outside of standard construction hours during site establishment*." However page 12-61 states that there will be out of hours site establishment works for tunneling works, with the assessment for this shown in Table 12-39. Table 12-39 lists a number of activities under tunneling site establishment that would not appear to be related to site establishment but to construction works themselves ie piling and excavation. Given the numbers of receivers

that are proposed to be exposed to noise with the potential for sleep disturbance during these out of hours works, there needs to be more justification given for why it is necessary to undertake these activities out of hours.

Section 5.2.1 of Appendix J shows that not enough information is available to make an assessment of the impacts for construction works that would be undertaken concurrently but states that the maximum noise level increase would be 3dBA on the maximum noise level that is predicted for individual construction scenarios. Without information on the numbers and locations of equipment and plant and what activities could be undertaken concurrently, it is unclear what information has been used to come to this conclusion.

The proposal to undertake tunneling activities 24 hours per day, seven days a week, including associated activities such as spoil handling and haulage will place great pressure on significant numbers of nearby receivers throughout day and night-time periods as shown in Table 80 of Appendix J and is not justified.

Construction vibration impacts

In s12.3.2 on page 12-39 there is discussion about the application of blast vibration criteria with a statement:

“For projects such as this, with a shorter duration of blasting of 12 months or less, a higher vibration criterion may be reasonable. For this project, the location of the blast moves along the alignment such that any one receiver is affected for only a short period of time.”

With no detail given about how long ‘a short period of time’ is, there is no way to determine whether it is appropriate that a higher vibration criterion be permitted, irrespective of whether or not the referenced standard was developed for mining operations rather than road tunnel construction. Given the range of sensitivities to vibration within any one community, it would be more appropriate to apply a conservation measure in the first instance.

Page 12-87 discusses construction vibration impacts for potential cosmetic damage and to human comfort, however the proposed mitigation measures only address potential

cosmetic damage and not human comfort. Given the human comfort criteria are lower than those for cosmetic damage, then more information must be given to show how potential human comfort impacts will be managed, particularly for more vulnerable members of the community.

Page 12-88 states that during tunneling activities around 163 receiver locations are predicted to experience temporary vibration above the preferred vibration dose value during night-time periods and that vibration would be discernible at each of these receivers for around five days, with exceedences likely for around two days. Longer durations of impact are predicted at receivers near the tunnel portals.

More direct consultation must be undertaken with each of these potentially impacted receivers before approval for night-time tunneling works is given to determine whether or not this is an acceptable impact to impose on people during the night-time period. The justification for out of hours works should be the need to undertake the works out of hours due to safety considerations or in cases where there will be no or minimal impact to nearby receivers, as this is the industry standard for undertaking out of hours works. It is not acceptable to make a decision for 24 hours works purely on the basis of construction program. Additionally, the proposed noise and vibration management measures in Section 12.5 do not address this issue as they do not specify consultation with affected receivers prior to works commencing, nor do they contain any specific limitation on size of equipment to mitigate vibration impacts during works of close proximity. Proposed mitigation measure NV30 only requires the preparation and implementation of community consultation protocols, and does not give any certainty that the protocols would actually address this issue.

Cumulative impacts

The assessment of noise contained within the EIS does not discuss existing aircraft noise and potential future airport expansion in any detail, and how this relates to cumulative impacts in the proposal area. Aircraft and airport noise is already a significant aspect to the existing environment, particularly in St Peters, Sydenham and Tempe, and consideration of cumulative impacts between the proposal and the airport should be included as both are within the purview of the Government.



The discussion of cumulative impacts from the proposal and other projects on Page 12-90 is merely token as in reality it will be extremely difficult if not impossible to "*coordinate mitigation and management of construction noise form concurrent construction activities based on the programmed works*" as stated as there is likely to be different contractors working under different conditions of approval for each project. This means there is potential for some areas, such as around the Kingsgrove Upgrade and the St Peter Interchange, to be subject to ongoing and disruptive construction works over a long period of time. The EIS also acknowledges that *"there is potential for localized cumulative construction works around the St Peters interchange as a result of the future M4-M5 Link or Sydney Gateway*." This shows that the Government would expect these receivers to have to endure ongoing impacts from construction in this area. The statement that this is unlikely to lead to significant cumulative noise impacts as construction of the different projects would be staggered is misleading as there is likely to be cumulative operational impacts that have not been considered or included in this EIS.

Operational noise impacts

In the discussion on operational noise impacts, page 12-93 states that this project would be subject to greater volumes of traffic "…*once the full Westconnex program of works is complete, than if only the project were to be implemented*." This shows just how disastrous not only this project would be on the local community, but also how much worse the full Westconnex program would be if it were allowed to go ahead.

While some parts of the project, such as the western surface works area, are predicted to have improvements in road noise impacts (along with some exceedences for this area), page 12-94 sets out just how badly affected receivers in St Peters interchange and local roads area would be, particularly those along Campbell Street and Campbell Road. As stated on page 52 of Appendix J, these roads would go from being classified

as collector roads to being classified as sub-arterial roads with unjustifiable impacts to the local communities.

To propose an increase from around 13,000 traffic movements per day currently on Campbell Street to around 59,000 movements per day in 2031 is completely unacceptable, given the impact this will have not just on operational noise emissions, but also other factors such as traffic congestion, air quality, visual amenity, and community leisure activities.

There is a large number of receivers within close proximity of the St Peters interchange that are predicted to experience day-time (133 receivers) and night-time (145 receivers) operational noise impacts that are above the applicable criteria. The predicted impact to St Peters Public School is expected to exceed the internal noise criteria with windows open.

The proposed significant operational noise impacts to a number of receivers in St Peters, (over 17dBA increase in at least one case) would not be the case if the project did not go ahead, as shown in Table 90 of App J.

Given the "…*further consideration of feasible and reasonable noise mitigation measures..*", as set out in Section 12.5, states that open grade pavement and noise barriers will not be used around the St Peters Interchange, the proposed property treatment is likely to include measures such as double glazing and/or fresh air ventilation which will result in school children having to be shut up in closed window classrooms to meet the criteria and residential receivers having to keep doors and windows closed to avoid noise impacts. There will be no way to mitigate the operational noise and air quality impacts for school children and residents during outdoor periods.

This number of affected receivers is unacceptable and the proposal should not be allowed to include such a significant interchange in an area in which residential and educational receivers are already subjected to high levels of road and aircraft noise impacts. A well designed transport solution should aim to decrease negative impacts on the community it serves, not increase them as is clearly the case with this proposal.



Parallel routes

App J Section 6.1.11 provides predictions for impacts to “parallel routes” that are likely to be affected by traffic redistribution due to the project, however it does not include Unwins Bridge Road which is a significant parallel route within the St Peters/Tempe area and one that already experiences high levels of congestion, in the mornings, afternoons and evenings.

Environmental management measures

A number of environmental management measures for noise and vibration are proposed in the EIS. Of particular concern are the following:

NV05

“Property treatments identified for the operational phase of the project will be considered for installation before or early in the construction period, where they would improve noise levels”

NV06

“Permanent noise barriers will be scheduled for completion as early as possible in order to minimise construction noise”

Given the number of areas where the EIS delays the detailed assessment of noise and vibration impacts, presumably until after project determination, it is most likely that construction will commence well before information is available to base noise barrier design on, let alone construct them. Detailed noise and vibration assessment should be included in the EIS rather than deferred to after the project has been assessed and determined so that a more accurate picture of what is proposed is presented to the community for consideration and so that management measures such as these can be realistically implemented.



9.3 Conclusion

WAG formally and strongly objects to the increase in noise and vibration that will be experienced if WestConnex, including the New M5, is built, and to the inadequate and not fit for purpose analysis of the same undertaken in this EIS. We ask the Minister for Planning to reject the WestConnex New M5 project.



10.0 Objection to the socio-economic impact of the project and failure of the EIS to properly analyse these impacts

The Social and Economic Section is one example of what the City of Sydney calls the ‘profound inadequacy of the EIS”. WAG was and remains very critical of the separate Social and Economic studies for the M4 East. But for the M5, there is considerably less depth or assessment of signficant impacts on residents, students, workers and businesses. The study is barely evaluaitve at all and seems to almost be an afterthought done by AECOM staff who recognised that a box needed to be ticked.

WAG objects to the enduring and destructive impact that the WestConnex project, including the New M5, will have on the lives of the hundreds of thousands of people who currently live, work or study in or near its path.

The project will cause immense social harm. It will destroy long-established communities. It will cause an increase in air pollution-related deaths and illnesses. The increase in air pollution will inhibit lung and nervous system development in children. There are numerous ways of spending $17 billion that would deliver a much greater social and economic benefit, and would not cause so much destruction. Such alternatives are barely mentioned in this EIS and have certainly not been analysed as required by the project SEARs.

The social impact study is little more than a 'cut and paste' job and is insulting to communities where hundreds of tenants and owners have lost homes and others will live in decimated communities. The report exaggerates the potential positive aspects of the project, while the negative aspects are either downplayed, insufficiently detailed or omitted altogether. Where negative economic or social impacts are identified in the report, they are inadequately addressed in terms of management or mitigation actions to be taken.

Given even a fleeting inspection of the social and economic impacts listed in the EIS report (under “Appendix M: Technical working paper: Social and economic”), it is clear that the significant economic and social impacts that will arise from the New M5 project are only superficially covered.

The report exaggerates the potential positive aspects of the project, while the negative aspects are either downplayed, insufficiently detailed or omitted altogether. Where negative economic or social impacts *are* identified in the report, they are inadequately addressed in terms of management or mitigation actions to be taken. Whereas the previous M4 - East EIS report included separate (yet still insufficiently detailed and inaccurate) Social Impact Assessments and Economic Impact Assessments, this report claims to deal with all social and economic impacts of the project in a single, 76 page report. The following is a brief critique of some of the major social and economic assessment flaws of the New M5 EIS.

WAG also objects to the social impact analysis included in this EIS on the basis that it is markedly deficient, and meets neither the project SEARs nor what the community is entitled to expect from proper EIS process. And again, the proponents have failed to address the wider negative impacts of the entire WestConnex project, despite using the supposed benefits of the entire WestConnex as justification for proceeding with the New M5.

The whole WestConnex, including the New M5, will impact millions of people, and the Social and Economic Impact Assessment is where you would expect to find those impacts documented and evaluated in an EIS.

In regards to the New M5 in particular, the loss of homes and businesses will be irreplaceable. The social connections and networks of families and friends will be disrupted. However, no meaningful mitigation is proposed.

The central argument of the project proponents is that the perceived benefits of WestConnex will make Sydney a better place to live and work. However, the proponents do not provide any real evidence to support this. In fact, it would appear that the proponents are pushing ahead with the project in spite of clear external critiques and with no logical rebuttal to the critics.

The project has already had an impact on the health and wellbeing of local citizens. Many residents have reported becoming anxious, angry, depressed and resorting to medication. There will be further health, social and economic consequences on a

greater scale if construction activities remain unmodified, particularly in regard to 24 hour heavy vehicle movements and tunnelling work.

Even if the New M5 is completed, local pollution and noise hot-spots will remain.

As outlined there remain too many adverse impacts and unanswered questions about the social impacts of this project. From a health and welfare perspective, this is a slow-moving disaster for local affected communities. The disaster is easily avoidable and should be avoided by not proceeding headlong with this project. It is the wrong project at the wrong time for Sydney.

The Secretary's Environmental Assessment Requirements (SEARs) are not met
The SEARs are a list of direct requirements of the Department of Planning & Environment that must be successfully addressed in the EIS report.

The Planning Secretary's EIS required Westconnex to include in its EIS

- a description of the existing socio-economic environment;
- impacts on directly affected properties and land uses, including impacts related to access, land use, settlement and subsidence associated with tunnel excavation, property acquisition (including relocations and expenses for those properties acquired) and amenity related changes;
- **social** and economic impacts to businesses and the community within the vicinity of the proposal, with associated property acquisition, traffic, access, property, public domain and open space, and amenity and health related changes (including the broader regional impacts associated with the closure of the Alexandria landfill site should this be part of the proposal);



A description of the existing socio-economic environment and an assessment of the impact of the proposal on community facilities are included as SEARs for the New M5 EIS, yet the report does not meet these requirements successfully as community facilities (such as St Mary Church, 21 Swanson Street, Erskineville and Erskineville Town Hall, 104 Erskineville Road, Erskineville) in close proximity to the interchanges are omitted, and therefore do not form a part of the subsequent assessment of the proposal's impact on nearby community facilities. In addition to these two social and economic SEARs not being met successfully, the third, an assessment of impacts to businesses and the community within the vicinity of the project assessed against a number of impacts from the project, is also severely compromised in terms of accuracy given the error.

Not based on community consultation—community sentiment ignored

The report states that it is not based on direct community consultation (p. 9), but rather based on "research" undertaken by the community consultation team—however this consultation would have been undertaken before specific components of the project were finalised, and economic and social impacts regarding such an extensive project warrants specific and targeted consultation. Community concerns and sentiment surrounding the project are overlooked in this report.

Further, the strategic planning statements of local governments are assessed under the heading "Consultation and community values", however community values cannot be determined solely through the proxy of community strategic planning documents—these documents are not formed in response to the creation of a large road project. Community sentiment regarding the project would be better gauged through an assessment of media articles and letters to the editor relating to WestConnex, the firm opposition of local councils including City of Sydney to the project, the number of protests and petitions, including the number of submissions opposing the M4 – East EIS, and the formation of numerous community groups including WestConnex Action Group (and WAG Beverly Hills/Kingsgrove and WAG Haberfield and Ashfield), Cyclists Against WestConnex, Save Sydney Park, NoW (No WestConnex) and Save Newtown from We$tConnex (see http://westconnex.info/resources/ for a full list). This extensive opposition and community concern relating to social and economic impacts is not noted in the report.



Of the 22 community concerns that are identified surrounding the Construction of the New M5 project (no source for these is acknowledged), including five concerns relating to property, nine relating to accessibility and parking, four relating to amenity and four relating to community facilities, none are addressed in detail regarding management or mitigation within the report. Of the nine community concerns raised surrounding the operation of the project, including three relating to property, one to accessibility and parking, three to amenity and two to community facilities, none are addressed in detail regarding management or mitigation within the report. Further, this is a severely incomplete list of community concerns: for instance local concern surrounding "accessibility and parking" extends far beyond the implementation of a toll on the New M5, the only concern given in the report, to issues of local parking (691 car parks will be lost in the St Peters/Mascot area alone due to construction), local street traffic severely reducing accessibility and the fact that an obsolete road project is being implemented that in many instances won't improve congestion and in many cases will worsen it.

Property values excluded—despite significant social and economic impact

The report states that because property values are of a "temporary nature" (p. 9) they are not included in the report, despite the fact that property acquisition, the valuing of property and subsequent relocation that is affected by property reimbursements, will have significant social and economic impact on those relocated. The report ignores this significant consideration.

Social impacts of compulsory acquisition excluded

Compulsory acquisition of properties and forced relocation has significant social effects on those required to relocate (whether businesses or residents) and also on the social cohesion of the community from which they move, at the street, local and wider community levels. No consideration of these impacts to "the local community's sense of connectedness and community cohesion" is given, nor to the loss of this sense of community experienced by those relocated.

Impacts on freight and commercial movements excluded

Further evidence of selectivity of issues covered is provided relating to impacts on freight and commercial movement that would "occur beyond the scope of the study, at a state-wide or national level" (p. 6), yet if these impacts are not assessed as part of the

EIS project then they will likely go unassessed—and the project approved without scrutiny of them. The EIS should arguably include all potential impacts of the project.

Simplistic economic model assumes only benefits of project

No cost-benefit ratio is used to assess the potential economic viability of the project, and no consideration of the opportunity (?) cost of an alternative project is given.

The use of Economic Multipliers as the economic model indicates assumptions of economic success, and allows for the benefits of the project to be given in more definite terms than the costs (making them seem more “real” and more likely). A more accurate model would weigh this assumed economic stimulus against the overall cost of the project, the risk of installing a toll road given such projects’ recent failures, and the societal costs of the new road (including induced traffic demand and congestion resulting from the project). Whereas congestion is ascribed a cost to justify the project, it is not costed here when it is caused by the project. A more detailed assessment of the costs and economic benefits is essential to rationally evaluate the project.

Large numbers of child care, education, health and emergency, aged care, sport, recreation and community facilities uncertain over how they will be affected by the project

29 child care facilities, 10 primary schools, 6 high schools, 2 tertiary education facilities, 13 emergency, health and aged care facilities, significant open space, 20 sporting facilities, 2 libraries, 4 community halls and 20 places of worship (an incomplete list, see above) are identified as being in the study area, yet no methodical summary of the impacts of the project on each of these facilities is given in the report. This has raised questions among the community over the impacts the project will have on their community facilities, with few answers provided in the report.

The list of community facilities is incomplete. This is a routine task which should have been done easily. St Pius school is an example of one school that is left out altogether. Erkineville School which is very close to Lady Gowrie Child Care Centre is excluded. This is of concern because although it is not modelled, many children in that school live between Erskineville Road and Sydney Park Road and are clearly impacted by the projected increase of traffic in the area, Newtown Public School which is no closer to the

project is included. There is no explanation of the methodology that has been used, adding to the impression of almost callous disregard for affected communities.

Overall economic effects of project left ambiguous and unclear

In summarising the key economic findings, the report states that local businesses will benefit from increased expenditure by locally made purchases, and through improved economic vitality, yet in the same section acknowledges that access arrangements and parking impacts will negatively affect local businesses. So even after reading this report, business owners in the areas affected remain unsure whether the project will improve or negatively affect their business. Stakeholders are then unable to make informed submissions on the EIS as it relates to their specific situation given this ambiguity.

The report does not address a final design

The report, when addressing the number of parking spaces to be lost as a result of the project, states that “The final numbers would be confirmed during detailed design”. Why has the EIS been published for public review if the final design remains unknown? How can complex matters such as traffic modelling have been undertaken, and their results used, without knowing the final design?

No mitigation or management measures relating to economic or social impacts are actually given in the report

Despite the significant economic and social impacts that will undoubtedly result from this project, no measures are outlined under “Mitigation and management measures” to address them. Instead, the response to each issue refers to another chapter of the EIS.

Cumulative positive effects highlighted while cumulative negatives ignored

While cumulative benefits in travel time savings and productivity are claimed for the whole 33km WestConnex, cumulative negative effects are almost completely overlooked in the entire EIS, including its socio-economic analysis.

Negative impacts are restricted to the New M5 project footprint. They are not extended to include impacts on nearby local government areas, or the combined impacts of the New M5, M4 East and M4 widening on traffic congestion in the inner west and

south-west. This has the effect of underestimating the negative socio-economic impact of the project.

Issues with assessment methodology and findings

It is noted that for the M4 East, AECOM conducted an economic impact study (criticised as inadequate by local Councils and residents) but hired a consultant to do the social impact study. This study was inadequate but did at least acknowledge the significant stress and psychological impacts on residents of loss of community, the psychological impacts of being forced to move away from your social networks and the stress of living with years of construction and loss of social and visual amenity. However for the New M5 AECOM did not even bother with that and simply rolled the social and economic impact into one.

We object to the fact that there was no economic impact conducted for this project and this alone would be reason for rejection of the project.

It claims to have carried out a cumulative assessment of direct, indirect, and cumulative social and economic impacts of the project on communities, residents, businesses, users of education, health, open space and other community facilities and road users and to have identified means of mitigation.

WAG is aware because of our limited engagement with WDA that community consultation was a farce and therefore the cumulative assessment approach should not be considered as acceptable and valid. A proper community consultation process should be required before the proponent should have approached Planning for approval of this project.

Social impacts that the applicant has failed to consider include:

- Ongoing implied forced acquisition of property prior to any official approval for the project
- Loss of community – people moving before because they fear the impact
- Loss of recreation areas and green space – Sydney Park, Simpson Park and Camdenville Park to name a few.

- Isolation of 175 year old St Peters Church from the community – the interchange will make access very difficult.
- Loss of heritage
- Impact of children in the community – walking safety to St Peter's public school
- Impact (and potential) closure of St Peters public school
- Considerations of other public school and day care centres in the area – at least three were missing from the list provided in the NewM5 EIS
- Air quality issues/health issues

The EIS clearly outlines the enduring and destructive impact that the WestConnex project will have on the lives of people in select communities of the inner west. The loss of heritage items will be irreplaceable. The social connections and networks of families and friends will be disrupted. No meaningful mitigation is proposed. The central argument of the project proponents is that the perceived benefits will make Sydney a better place to live and work, so presumably, although it is not stated explicitly, the enforced sacrifices on several hundred thousand residents of the inner west justifies this outcome. The proponents do not give any real evidence to support their thesis and to date no business case, with all the socio-economic costs and benefits, has been made available. In fact it would appear that the proponents are pushing ahead with the project in spite of clear external critiques and with no logical rebuttal to the critics.

The so-called social impact analysis in the EIS is markedly deficient and requires to be re-done if it is meet the requirements of the SEARS and what the community would expect.

The project has already had an impact on the health and wellbeing of local citizens. During construction further impacts are proposed, that if unmodified will have serious impact on local wellbeing, particularly the 24 hour heavy vehicle traffic and tunnelling work. Even when the New M5 is completed, local pollution and noise hot-spots will remain, with worsening congestion on roads beyond the New M5 footprint. As outlined there remain too many unanswered questions about the health impacts. From a health and welfare perspective, this is a slow moving disaster for local affected communities.

Ordinary members of any community find it difficult to engage with planning processes at the best of times. This EIS process is no exception and appears to have been deliberately designed to worsen the stress and workload of people who affected by and wish to respond to this project.

The release date of the New M5 EIS for public submissions has had a further impact of communities, as it was times to be open for comment over the Christmas and summer holiday period, when many families need a rest.

To release a nearly 8,000-page, multi-volume document full of complex and often contradictory material for analysis and comment over this time is evidence that the proponent wants to “tick the box” in relation to public consultation, but limit the opportunity for the community to have their say, or for proper considered analysis to take place. It is exactly what the WAG feared would happen, that the local community and the most directly affected residents in the community would not have the opportunity to raise their concerns about this project, particularly as some people already reported feeling “worn down” by the whole process.

The lack of transparency from the applicant and the slow release of components of the project, means that this massive task has been left to voluntary community groups such as the WestCONnex Action group when it is a responsibility of Govt to provide this information. In return, the minister responsible, Duncan Gay has been allowed to insult and ridicule us for our efforts and caring about where we live and the environment.

This has involved a considerable personal commitment made by hundreds of individuals during the course of this campaign, which has had its own social impact: loss of earnings, frustration, anxiety, and more. This could all be avoided if the applicant had properly and thoroughly consulted with the community from the outset.

Simply listing social infrastructure within the study region cannot be defined as social impact assessment. Even so, AECOM has failed at even this basic task. Numerous schools and childcare centres, for example, were missing from its tables of educational facilities along the project route. This suggests not just sloppy work, but also a failure to properly and fully analyse the impacts of the project on these critical institutions. Given

the social impacts on children who attend these facilities is likely to be severe, this is a serious mistake on the part of AECOM.

Little is made of the sense of community or the impact the project might have in this assessment. Social infrastructure can be defined as the 'hard' infrastructure (Hancock, 1993) such as halls, schools, churches etc. and is rudimentarily addressed in this SIA and EIS, as well as the 'soft' infrastructure such as the relationships that form between people and groups in the community that is largely overlooked in this report.

A relevant example of 'soft' social infrastructure might be the fact that in many suburbs groups have mobilised against the project – simultaneously giving an idea of community sentiment regarding the project, community spirit and the types of social aspects that the report fails to even approach.

As with the majority of this EIS, much of the socio-economic analysis rests on the accuracy of its Traffic and Transport Assessment, which as stated elsewhere in this submission, is seriously flawed. As such, there can be no confidence in the accuracy of the other impact analyses in the EIS that are dependent on the traffic forecasts, including this section.

When evaluated against the international IAP2 Public Participation Spectrum, the 'community involvement' undertaken for the New M5 EIS centres around 'informing' (the lowest stage on the spectrum with the least impact on decisions) and only rarely could be considered 'consultative' (the second lowest). So many residents have complained about slow and vague response to information requests from the community about WestConnex and the New M5 that WAG believes its community consultation does not even reach the lowest level of consultation and public participation.

The EIA states that neither the proponent nor its consultant AECOM consulted directly with local businesses in the path of the New M5 EIS. Such a serious omission demonstrates the overall deficiency of the socio-economic analysis in this EIS.

There is also no suggestion in the EIS that it attempted to consider the impact on children as part of its socio-economic analysis. Given the high numbers of families in

the affected area, and huge concern of parents and children who attend local schools (which has been expressed publicly through a number of demonstrations centring around Haberfield Public School), this is another serious omission that demonstrates the overall deficiency of this socio-economic analysis.

Given the extent of the social and economic impacts that will occur as a result of the project, the list of proposed mitigation actions is insufficient in both impacts that it addresses and the detail of responses given for the matters that are addressed. Some impacts such as trauma during property acquisition have been happening for months, whereas the suggested mitigation is treated as if it is the future.

- **Demolition of rental stock**: One impact of the New M5, particularly in St Peters, is the proposed demolition of many homes with long-term renters. There is little if any equivalent stock available for them to rent at similar prices nearby. Many of the people being forced out their homes will have to find a new home some distance away from their established communities, in which they have lived for years. Compulsory acquisition processes are already being implemented on local residents. Families, friends and neighbours are being separated. So while the impact is most significant for the people who are being forced to move, it also affects the thousands who remain behind in their once shared community. Housing stock needs to be replaced and made locally available for people on low incomes.
- **Support for those affected by proposals**: The EIS suggests WestConnex would offer a counselling service to those impacted. This is a somewhat akin to a person assaulting another and then offering counselling to the assaulted person! No consideration is given to offering independent financial, legal, counselling and social support to affected people.
- **Loss of community**: Changes to the amenity of a street or suburb can negatively impact the sense of belonging and identity of its residents and consequently their cohesion and connectedness. Areas with heritage values can also be a significant contributor to local character and community sense of place. Impacts on heritage assets affect not only the value of the assets, but the value communities place on the quality of their environment, and their connections to it, both past and present, with the whole project having cumulative adverse impacts. Yet no solution or restitution is proposed to mitigate this impact. This is not acceptable.

- **Impact of ongoing forced acquisitions of homes and business**: Residents and businesses along the project route have now received compulsory acquisition notices (PANS), which set a 90-day time frame for a negotiated settlement to be finalised, before legal proceedings would commence. Residents, some of whom have lived their whole lives in the district, are being forced from their homes. Residents report that RMS staff are behaving in a forceful and bullying manner towards them, WAG has been contacted by numerous home and business owners affected by WestConnex compulsory acquisitions across the route, including the New M5, who have reported being offered hundreds of thousands of dollars less than what they are legally entitled to. All of these affected property reported suffering physical and mental anguish as a result of the process, with anxiety, depression, insomnia, relationship strain, significant weight loss and worsening of existing conditions such as schizophrenia, chronic fatigue, and high blood pressure all being reported to WAG as a direct result. The only true and fair way of mitigating this social and health impact on affected residents is to cease all property acquisition processes must cease until there is full release of the WestConnex business case to parliament (no redactions) and the public to allow appropriate analysis of the entire project, including this New M5 proposal, to be considered and independently verified. This must include a full socio-economic impact analysis that accounts for the true costs of the project and does not hide the costs borne by individuals if the New M5 project were to proceed. Should the project stand up to this level of transparency and independent scrutiny, affected property owners must be offered just compensation for their losses, and be left in a position that is no worse off than they would have been had they not been forced from their homes or businesses for the toll road. This protection should also extend to rental tenants who live and/or run a business from an affected property.
- Grief over the forced loss of homes, businesses and communities will have an enduring influence on many people, including those forcibly moved and those that remain. It will also increase the risk of both anxiety and depressive conditions. The loss of home and community attacks a basic need for all humans, to have stable shelter and accommodation. The lack of any proposed mitigation for this major impact is a serious deficiency in the EIS. There should not be any progress on the project until this matter is satisfactorily addressed and appropriate restitution made to affected residents.
- The loss of close family and friends from an immediate neighbourhood diminishes the quality of life for many people. Increased isolation, particularly those who were in their own or rented flats will be associated with increased health morbidity. It is most

likely that the initiation of the project will hasten the death of many elderly residents if they are displaced from their long-standing homes and community. The lack of a clear and compassionate plan to deal with these major social problems is a serious deficiency of the EIS.

St Peters is severely impacted and the lack of analysis in the EIS is glaring.

Case studies: Social impact

Janet Dandy-Ward, resident, St Peters

My husband and I emigrated to Australia in 2011 (leaving all our family back in the UK) and we moved into this house in Roberts Street deciding that it could be a base whilst we think about what area we might want to move to. We fell in love with the street, our neighbours, our community, the community pre-school and our surrounding green spaces such as Sydney Park, Tilman and Simpson Park – all will be affected by WestCONnex.

We have decided that St Peters is where we want to live and have already invested so much in the community – this is something that is worth fighting for; for my family, for our neighbours who are potentially losing their homes due to forced acquisitions, for those older and vulnerable residents who are now feeling uncertain about their future in this and other suburbs. Sydney deserves better.

As a social worker, I have a deep sense of social justice. I believe that this project will not meet its key objectives including reducing traffic congestion. This is a fundamental flaw. The social and environmental impacts briefly described in the EIS are unacceptable and far outweigh any benefits of the project. There are so many aspects of the traffic modelling that as a mum and a full time trainer in a large children's charity, I have not had time to address in my submission. I have read the research about traffic inducement and I firmly believe that if you build more roads then more traffic will come, I saw this back in the UK with the development of the M25 London Orbital Motorway.
It is a project with no winners.



In all my objections to this project, it is now clear that St Peters is not the only suburb that will be wrecked by the St Peters Interchange. The “remediation” (or rather development) of Alexandria Landfill, the prospect of two unfiltered poison stacks, a large section of Sydney Park taken for a ‘works compound’ that we “will be likely to have returned” and a high volume of additional traffic dumped on already congested local roads are of major concern across the suburbs of Alexandria, Erskineville, Newtown, Enmore, Camperdown and beyond.

But most of all, the social impact of WestCONnex will be felt in a community where people are very uncertain of their future. I have two very good and personal examples of this;

1. The local public school, a small school which my son will attend next year (St Peters Public) has in recent years been growing and hopes to attract students from the surrounding suburbs but with safe access to the school now in doubt because of the footprint of WestCONnex which extends into the Campbell Rd Road Widening Scheme. This part of the project is already adversely affecting people, some because of the property acquisitions and some because of WestCONnex uncertainty. A number of young families and older members of the community have chosen to move away from the suburb before the planning process is even complete.
2. When I asked an older neighbour of mine, who has lived in Roberts St for 30 years what she thinks WestCONnex will do to our community, she said “there is a sense of dis-connectivity now, we all feel very unsettled. We have a unique community (looking out for each other and sharing celebration together) WestCONnex will ruin it and it will not solve the problem.” She added that she and her husband are getting older, they rely more and more on public transport and feel that this is being neglected for a toll road that the citizens of NSW will be paying for long after she has gone.

   Incidentally, the neighbour I mention above is like a surrogate grandparent to our son. It is likely that she and her 80 year old husband will move from the street if this project goes ahead.



Tamara Regan-Thompson, resident, St Peters

My children attend St.Pius on Edgeware Rd in Enmore, which will be drastically impacted by Westconnex. In the EIS, St.Pius is not included in the tables that show what educational facilities affected by the construction of the road.

As St.Pius is not included in the EIS, in particular table 15.2, the Principal of St.Pius has failed to realise that the school will be affected greatly. The omission of St.Pius has led to an inability of the P&F to act and create submissions. The Principal has failed to protect the school community from the effects of Westconnex. The Principal has failed to report the numerous Westconnex trucks that go past the school illegally.

The health and safety of our children has been completely compromised by the lack of awareness of the road and its omission from the EIS.

The Westconnex project has seen massive social implications in St.Peters. Elderly and the disabled have been completely displaced by the underhanded processses of Westconnex. The elderly and disabled have been scared into unecessary actions by Westconnex.

My neighbours of 15 years were part of this atrocious displacement. My two elderly neigbours, Derek* and Richard* had resided in St.Peters prior to the original 1950's RMS road reservation. Their parents purchased their property in the early 1900's and both men were born and raised in their property in St.Peters. One of the elderly men has a Mental Health disorder and the other a physical disabilty. They were pushed out of the only the community they know even before the road has been approved. They have been displaced and the effects of this displacement has further exacerbated both of their disabilities. There has been no social justice in the aquisition process.
My children loved speaking to the old gentlemen of St.Peters. Now they are gone...before the project is even approved.

Emma Pierce, resident, St Peters

Frankie and Thalia, 5, have grown up attending pre-school together. They played in the school playground most days when their older sibings were being picked up from

school.The little girls were excited to be starting school together this year but their friendship is just one of many that has been cut short by Westconnex.

Instead, the community of St Peters is being torn apart as families, including Thalia's , are forced to leave to make way for the Westconnex tollway.

Frankie's mother, Emma Pierce, is a special education consultant and researcher. The family also have a nine-year-old daughter, and have lived in the same cul de sac for eight years. Emma, eloquent and energetic, says they felt "pretty fortunate" to be living in an "amazing little community".

But if the Westconnex New M5 goes ahead, their front door will be 200 metres away from a Los Angeles style motorway interchange, and about 150m away from an unfiltered toxic emissions stack near the end of the New M5 tunnel.

Emma says these are "massive concerns", particularly with fine particulate emissions from pollution stacks being touted as the modern asbestos. But it's the thought of her daughter losing her best friend to the Westconnex relentless appetite for houses that upsets her. "Lots of friends are having their houses acquired and not given the just compensation, that they deserve, and also people who are renting are forced out because they can't afford to re-rent in the area where they've lived for a really long time."

Concerned about the impact Westconnex could have on her community, Emma joined the campaign against it even before plans to force hundreds from their St Peters homes were announced in late 2014. Along with her friend Janet, she founded the Westconnex Action Group which quickly grew to include other residents. But, as she became more aware of the project, her concerns also grew to include issues around transparency and the "massive waste of taxpayers' money".

"It started off as something impacting on my backyard, but from there it became much, much bigger," says Emma. "I was thinking to myself, this isn't the Sydney I want to see, it isn't actually even answering what it says it wants to be answering. People in western Sydney are being told this is going to be an answer, when actually they are going to be ripped off."



‘There was no full business case released so there is no evidence to support this up to $17 billion project, which is being put forward to the public with no evidence, nothing to back it up. It seems crazy that based on no evidence you could spend $17 billion.” While other cities have learnt from their mistakes and are now swapping polluting tollways for public transport, Sydney is going back to this archaic project from the 1950s, says Emma.

Consultation has been an “absolute joke” too, says Emma, who argues that none of her experiences with the Westconnex information sessions would meet professional criteria for a consultation. She fears the sessions have been ticked off as “consultation sessions” when they are nothing but “information-giving sessions”, with no interest in actually discussing the communities’ needs.

“The sessions have been about presenting information which changes all the time, and also misinforming people – providing information without actually knowing the full story, so they won’t be able to actually answer people’s questions directly.”

“It felt to me that the Department of Health had their hands tied, and were not really able to give us a lot of information or support, which was a bit disappointing.”

2015 was a very long year for Emma and the other Westconnex Action Group members, culminating in a “pretty awful” summer. Campaigning against the Westconnex takes place in addition to work and a busy family life.

But Emma says she has no choice, and accepts this, even if it may not be fair. “It’s something I need to do. That’s mostly ok, but it’s also not fair that the community is put in a position where the only way they can be heard is to be incredibly vocal and persistent. It’s a big time commitment, and particularly this recent environmental impact assessment.”



Kathy Calman, resident, Beverly Hills

The communities of Beverly Hills, Kingsgrove, Bexley North, Earlwood and Arncliffe lived through years of construction for the first M5 circa 2001, (Legacy M5).

The legacy M5 resulted in a 'Berlin Wall' effect that separated our community into two. The North and South sides. It also had a devastating impact on residents in regards to pollution. Turrella and Earlwood, with an unfiltered exhaust stack, and Bexley North and Arncliffe with tunnel portals (openings).

Homes, the trees and parks taken. Years of construction, and then, to thank us for our endurance, we were handed cheap, visually divisive noise walls and poor urban design. The urban design and landscaping was of such a poor standard that Allambee Crescent Nth Beverly Hills actually features in the RMS Landscape and Design Principles as an excellent example of what NOT to do.

It is a credit to Council and a few residents of these communities that they took the repair of our environment into our own hands. We had no choice because the RMS would not.

The M5 turned out to be a noisy congested old fashioned solution to traffic congestion. But the NSW government has learned nothing. Again last year we found ourselves faced with new projects. Firstly there was the expansion of the King Georges Road Interchange and now a duplicate of the old failed M5 – call the New M5

What standard of repair can we expect from Westconnex 15 years later?

A review of the current KGR M5 Interchange Landscape Design shows that nothing has changed in the last 15 years. WestCONnex has already demonstrated the same scant regard for communities and offers only minimal rehabilitation after construction.



We are faced with the mature vegetation being stripped away as the walls are torn down for the early stage of the widening of the King Georges Interchange, which according to Westconnex's own figures will leave the intersection at the worst Level of Service (F). We have engaged with every part of the process. At a landscape review meeting some months back, AECOM Landscape Designer (Frank) advised residents that hundreds of metres of wall would remain bare because it is easier for maintenance crews to inspect. When we showed him evidence lifted from RMS's own *Urban Landscape Design Principles* on how to deal with pinch points, we were later advised that there are now *'new WestConnex Urban Design Principles'.*

When we questioned why the Cooloongatta Rd bridge section would contain transparent walls, we were told it was to protect cyclists. When we could find no reference to this in any of the cyclist safety guideline documents we were referred to, we were told that it was a '*new WestConnex Safety Guideline*' criteria. Unfortunately, it wasn't available to be shared with the public. There is so much material that's not shared with the public!

One could be forgiven for thinking WestConnex are making it up as they go along.

Near the Cooloongatta Rd. Bridge is an example of native plantings successfully used in legacy M5 to improve the visual harshness of a concrete noise wall in a narrow space. These shrubs reached the top of the wall, just prior to being destroyed by in September 2015. The new plan for this section is transparent noise walls. Community backlash, including the involvement of local MPs, have forced WestConnex to reduce the length to 12 metres, down from the original 28 metres.

Why does the M5 Linear Park matter?



The M5 Linear Park is an off-road shared path that runs parallel to the M5 East Motorway between Belmore Road, Riverwood and Bexley Road, Kingsgrove. The M5 Linear walk is used by hundreds of people each day.

The linear pathway is an important active transport artery that connects the community members to each other, as well as schools, shops and train stations. Older children can safely cycle to sports training or friends' homes without having to cross a road.

It's a lovely place to walk or cycle aiding both physical and psycholotransparent noise walls to the north and 700 metres to the south would provide drivers with views across the golf course, Beverly Grove Park and Tallawalla St. Park. From the walker's perspective, almost two kilometres of our pathway would overlook lanes of motorway from behind a plastic wall.

This design is neither reasonable nor moral for our community to accept.

gical well-being, reducing stress and reconnecting with nature. Within a highly built urban environment, such as at Beverly Hills, you highly value our remnant of natural bushland and plantings that complement it.

Now unbelievably, much of this natural and planted landscape along our linear walk – including the critically endangered Cooks River Clay Plain Scrub Forest – is planned for destruction.

WestCONnex designers have taken the opportunity with their noise wall design to enhance the motorist experience. 1200 metres of this section of our walkway will be replaced by a uniform and monotonous landscape design. The human brain is hardwired to appreciate the diversity, the complexity and the changing form of our environment, whether built or natural.

A dominant feature in this landscape would be a 33 metre tall unfiltered exhaust stack and a motorway complex. This 'chimney' stack will spew concentrated toxins from a 9

km tunnel – a reminder to all us walkers and cyclists of the constant serious threat to our health.

The enjoyment of walkers would be further marred by high noise. The tunnel portals require noisy industrial size fans to manage vehicle emissions which would add to the ever present high traffic noise.

An unfiltered exhaust stack in the valley of Kingsgrove is not reasonable for our community and should not be accepted.

Conclusion

WAG formally and strongly objects to the negative and irreversible socio-economic impacts that will result if WestConnex, including the New M5, is built, and to the inadequate and not fit for purpose analysis of the same undertaken in this EIS. We ask the Minister for Planning to reject the WestConnex New M5 project.



11.0 Objection to the flooding impacts and insufficient analysis of such impacts in this EIS

WAG objects to the impact the WestConnex project, including the New M5, on flooding impacts and hazard risks, and the failure of this EIS to properly investigate and report on these risks.

The analysis contained in the EIS fails to meet at least one of the SEARS, *"Soil and Water - including but not limited to: Identification of potential impacts of the project on existing flood regimes, consistent with the Floodplain Development Manual (Department of Natural Resources, 2005), including impacts to existing receivers and infrastructure and the future development potential of affected land, demonstrating consideration of the changes to rainfall frequency and/or intensity as a result of climate change on the project. The assessment shall demonstrate due consideration of flood risks in the project design."*

In general, the assessment of flooding and any necessary stormwater upgrades and improvements has not been addressed sufficiently within the EIS. Much of the EIS states that further detailed investigations will need to be undertaken during detailed design and construction planning. It is not acceptable that so much of this investigation has not taken place as part of the EIS itself, which would have given affected Councils and residents an opportunity to review, assess and comment on the risks identified. It is also not acceptable to leave these investigations to simply be summarised in a Submissions Report, as a condition of Planning approval, or once the project starts, when the community will have little to no ability to comment on or modify the proposed approach.

This is particularly concerning given areas of St Peters, such as the parts of Campbell St towards Unwins Bridge Rd, are already subject to flooding in heavy rains.

The key stormwater and flooding issues are as follows:

- The assessment of flooding and any necessary stormwater upgrades and improvements has not been addressed sufficiently within the EIS
- There are unacceptable proposed increases in flooding to downstream properties

- There are potential increases in stormwater volumes within the local council stormwater pit and pipe network.

In general, the assessment of flooding and any necessary stormwater upgrades and improvements has not been addressed sufficiently within the EIS. Much of the EIS states that further detailed investigations will need to be undertaken during detailed design and construction planning.

Specific details of the location and possible upgrade/changes to stormwater structures have not been provided within the EIS. If there are to be direct connections to existing downstream stormwater system, then a detailed hydraulic assessment and understanding of the proposed performance of the system should have been provided as part of this EIS. Where the connection is likely to increase the impacts on the local stormwater system, details of how it would be upgraded to meet the increased demand from the project should also have been included.

With the substantial works being undertaken for the project, this will pose a significant impact on the existing drainage network within this area. This will also have an adverse affect on the road network and neighbouring properties.

Overland flow paths will alter and be diverted. This will also have an adverse affect on the road network and neighbouring properties.

Some existing pipe networks will no longer be functional. This will also have an adverse affect on the road network and neighbouring properties.

WAG formally and strongly objects to the potential flooding impacts that WestConnex, including the New M5, will cause if built, and to the EIS's inadequate analysis of these risks. We ask the Minister for Planning to reject the WestConnex New M5 project.



12.0 Objection to the poor assessment of construction impacts

The scope of the modelling for the impact of construction as assessed in the 150 page Chapter 9 of the EIS and associated 298 page Appendix G does not allow for the full, system-wide effects of the construction traffic to be analysed sufficiently. Increasing the scope would go some way to identifying the true impact of the construction on traffic, and would also better allow the cumulative impacts of the project on traffic and transport to be gauged.

Community facilities close to the construction works are given in Chapter 15 (Social and Economic), but the report states that “During the construction of the project, there is the potential for *positive* and negative impacts on residents, businesses, road users (including commercial and freight vehicles), users of community facilities and the wider community” (Appendix G, p. 100, emphasis added)—what will the positive impacts be? These are not outlined and difficult to imagine, especially as they relate to traffic and transport.

“Tunnelling works (including fitout works but excluding blasting) would be undertaken 24 hours a day, seven days a week to minimise the overall length of construction and the duration of any associated amenity impacts on the local community. All activities that support tunnelling would also be required to be undertaken 24 hours a day, seven days a week. Handling of spoil at the surface would be required as stockpiling large amounts of spoil within the main alignment tunnels would not be feasible. Spoil is therefore required to be transported from the main alignment tunnels to stockpiles on the surface (within acoustic sheds and non-acoustic sheds), prior to haulage from the site” (Appendix G, p. 99)—spoil will be carried by heavy vehicles at all times, including peak times, leading to a greater disruption of local and regional road networks, and continuously throughout the night, which will be highly disruptive to residents located along *local* road networks upon which they travel

Insufficient employee car parking is provided at many of the construction compounds (Appendix G, p. 186), including:

- Kingsgrove North construction compound, 170 employee parking spaces on-site, likely employee peak 200



- Arncliffe construction compound, 220 employee parking spaces on-site, likely employee peak 300
- Canal Road construction compound, 290 employee parking spaces on-site, likely employee peak 320
- Campbell Road Bridge construction compound, 10 employee parking spaces on-site and likely employee peak of 15

The temporary impact on car parking in St Peters and Mascot due to construction includes:

- Albert Street—loss of 44 on-street car parks
- Campbell Road (between Campbell and Sydney Park Roads)—loss of 111 car parks
- Euston Road (between Campbell and Sydney Park Roads)—loss of 112 car parks
- Burrows Road (south-west of Campbell Road)—loss of 38 car parks
- Burrows Road (north-east of Campbell Road)—loss of 23 car parks
- Euston Road (north of Sydney Park Road)—loss of 24 car parks
- Huntley Street (east of Euston Road)—loss of 32 scar parks
- Barwon Park Road (north of Campbell Road)—loss of 6 car parks
- Princess Highway—loss of 30 car parks
- May Street—loss of 50 car parks
- Unwins Bridge Road—loss of 39 car parks
- Brown Street—loss of up to 16 car parks
- Florence Street—loss of up to 16 car parks
- St Peters Street—loss of up to 12 car parks
- Hutchison Street—loss of up to 10 car parks
- Gardeners Road (west of Bourke Street)—loss of 10 car parks
- Gardeners Road (between Kent Road and Gardeners Road)—loss of 47 on-street car parks and 20 off-street parks
- Bunnings Mascot—loss of 25 off-street car parks
- Bourke Road (north of Bourke Street/Gardeners Road intersection)—loss of 26 off-street car parks

The total figure is not given in the report, but it totals to 691 lost car parking spaces due to construction, in the St Peters and Mascot areas alone. This is in addition to the insufficient employee parking provision as outlined above, which will further add to the deficit of local parking



- No further mention of these deficits and their likely impacts on residents, workers, visitors or businesses, or any plan to mitigate these impacts, is made in the report other than stating: “Residents and businesses could be negatively impacted by construction workers parking on local streets, with decreased parking available for business customers…Construction personnel would be encouraged to use public transport, active transport or other options, such as car-pooling” (Appendix G, p. 192)

Level of Service (LoS) of roads, as modelled in the report, drops surrounding the construction compounds at the Western and Bexley Road surface works, the Arncliffe surface works and the St Peters surface works locations. Construction of the WestConnex project is directly attributable for these rises and if a poor LoS on roads is seen of enough of a concern by the NSW Government to introduce the WestConnex project in the first place it is unclear why declining LoS on roads locally as a direct result of construction is not of greater concern in the report, and dealt with more effectively throughout. For instance:

- It is noted in the report that construction traffic from the Western and Bexley Road surface works construction compounds alone will consist of 4,860 vehicles a day (Appendix G, p. 146), 64% of these heavy vehicles, which (especially given the proportion of heavy vehicles) will have a significant impact on road functioning and amenity of all road users and residents
- The St Peters construction precinct will lead to 3,035 additional construction light vehicle movements and 2,218 heavy vehicle movements daily. Further, “as the construction compounds are surrounded with local roads, use of the local roads is unavoidable to support the construction activities” (Appendix G, p. 185-186), so all of these movements will be occurring on *local roads* (including Canal Road, Campbell Road and Burrows Road)

“Almost 3.2 million cubic metres of surplus spoil to be generated by the site, which then requires offsite reuse or disposal. No decision has been made as to where to dump the spoil as yet, however potential sites given include 330 Captain Cook Drive, Kurnell (15km from project site), 738-780 Wallgrove Road, Horsley Park (40km away), 75 Townson Road, Schofields (55km away), on land west of Riverstone (60km away) and/or at 49 Manorhouse Boulevard, Quakers Hill (60km away).” (Appendix G, p. 194)—It is difficult to accurately assess the construction impacts on transport and traffic

without knowing where the spoil is to be taken, especially as 80% of trips by heavy vehicles (Appendix G, p. 201) will be carrying spoil. Indeed, the impacts of carrying spoil to some of the proposed sites (such as those 60 kilometres away) must be far larger than carrying it to closer areas, yet this is not acknowledged in the report.

Cumulative construction impacts are insufficiently projected and consequently insufficiently addressed:

- The King Georges Road Interchange Upgrade will occur concurrently with the New M5 project, yet cumulative impacts are simply waved away and not given sufficient analysis
- The WestConnex stage 1 will also occur simultaneously, however again it is stated that cumulative impacts are unlikely. Such a fleeting analysis ignores the potential for construction fatigue, for long-term changes to travel and shopping behaviour and to changes in overall amenity for road users, among other likely impacts as a result of these projects being undertaken simultaneously
- The Marrickville Metro Shopping Centre upgrade will also occur concurrently to the project, yet is again overlooked in terms of potential impacts other than construction traffic, which in itself will be significant when considered against that from the M5 project
- The Green Square development, Mascot Station Town Centre Precinct Masterplan and Wolli Creek redevelopment area are each again overlooked in terms of their potential impacts on traffic and transport. Given their proximity to the M5, the scale at which these projects are to occur and the already poor LoS of roads around the project area, greater analyses (and, likely, measures) are necessary to adequately deal with the combined and multiplied effects of these developments on traffic in the area

Given the modelled and potential impact of this project during its construction phase, the environmental management measures (Appendix G, p. 207-208) proposed are deemed insufficient in scope, intent and detail. Each measure is responded to briefly below:

Impact	Environmental management measure	Response

General	Develop Traffic Safety and Management Plans and related controls	Insufficient response given high volume of construction traffic generated and predominantly local street access to construction compounds. Such plans are necessary alongside the EIS so the traffic and transport impacts are able to be satisfactorily assessed
	Road dilapidation reports prepared for certain road	See above comment
Road network performance and delays	Construction staging and temporary works developed to minimise impact on existing M5 and provide safe separation between work areas and traffic lanes	Insufficient response given the modelled, forecasted impacts and as most construction compounds are noted to be operational from 2016 to 2019. This is standard practice and cannot be claimed to be an environmental management measure to address “Road network performance and delays”
	Vehicle routes developed which maximise the use of arterial roads	Insufficient response given the EIS report itself notes that “the construction compounds are surrounded with local roads, [so] use of the local roads is unavoidable to support the construction activities” (Appendix G, p. 185-186). More strategically and contextually appropriate construction compound placement could have mitigated this to an extent. Despite this “measure”,

		local roads remain essential to almost every heavy or light construction vehicle movement
	Over dimensioned vehicles procured through specialist haulage companies with permits from Roads and Maritime	This is outside of the scope of the "Road network performance and delays" impact and instead is both standard practice (procurement through specialist company) and a requirement for the operation of such vehicles (permit obtained from RMS). *The effects of these vehicles on road network performance are not actually dealt with through the measures listed*
	Lane occupancies planned to provide a safe work area, continued lane capacity and avoiding peak traffic periods	This "measure" refers to an action necessary under WH&S laws (provide a safe work area) and standard road construction practice
Pedestrian and cyclist movements	Measures to "safely manage pedestrians to and from bus stops, car parks, shopping centres, businesses, homes and any directly affected schools during construction. This includes selecting site compound access and egress points which avoid school children pedestrian access routes."	Insufficient detail given in Traffic and Transport report to identify those locations that will be affected in terms of pedestrian accessibility and amenity, particularly schools and children's pedestrian access routes. Such measures should be outlined in greater detail as part of this EIS report

	Alternative cycle routes provided	Insufficient detail given in Traffic and Transport report to identify those locations that will be affected in terms of cyclist accessibility and amenity, and no details as to the extent that such routes will cause increased on-road wait times, increased journey time and distance given closures to shoulders and detours, and reduced overall amenity of the area, as stated in the EIS. Also no detail on how cyclist safety on local streets will be maintained given heavy vehicle usage on these streets
Public transport	Proposed bus stop and route changes would be discussed with service providers prior to works, and passengers notified. Temporary facilities supplied as necessary	Insufficient response to "Public transport" considering extent of effects of increased construction traffic and works on accessibility to stops, local and stop amenity, safety of public transport users, and travel times
	"Where bus stops are relocated, pedestrian access will be maintained including (if possible) disabled facilities"	Insufficient measure. This action should ensure that pedestrian access is maintained *at the same or higher level*, including provision of disabled facilities at any temporary stops provided



WAG formally and strongly objects to the construction impacts of this project and the poor assessment of these impacts in the EIS. We ask the Minister for Planning to reject the WestConnex New M5 project.



13.0 Objection to biodiversity impacts and failure of the EIS to properly assess these impacts

WAG objects to large-scale negative impact that WestConnex, including the New M5, will have on biodiversity, and the failure of this EIS to properly consider those impacts.

WestConnex will greatly impact our environment and biodiversity. Huge amounts of space and parklands will be lost, including some of the last remnants of natural bushland in the inner west and south-west.

Typically an EIS downplays or dismisses the habitat value within a project footprint in order to remove or limit the biodiversity-promoting value that is there, and/or to understate the impacts of the project. This EIS is no exception, and it does this in a number of ways.

As with the rest of this EIS, there is also a failure to consider the negative impacts of the entire WestConnex route on biodiversity, both cumulative and otherwise, even as unsubstantiated “benefits” for the whole route are referred to repeatedly.

Even so, the EIS makes it clear that there will be unavoidable serious impacts to the endangered Green and Golden Bell Frog (*Litoria aurea*) and the critically endangered community Cooks River Castlereagh Ironbark Forest (CRCIF) if the project goes ahead.

Threat to Cooks River Castlereagh Ironbark Forest (CRCIF)

Sydney’s native vegetation communities have been subjected to intense clearing in the last 200 years. Some of these unique communities include Sydney Blue Gum High Forest (over 95% cleared), Cumberland Plain Woodland (94% cleared), Sydney Turpentine Ironbark Forest (95-99.5% cleared) and Shale Sandstone transition forest (around 80% cleared). All of these communities are listed as endangered or critically endangered.

The CRCIF is another one of these critically endangered Sydney vegetation communities, which is about 95% cleared. Sydney’s natural heritage is clearly very threatened by ongoing development, with so much of our native forest already gone to ‘development’ and expansion.

Section 184 of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) provides a list of threatened ecological communities that includes the Cooks River/Castlereagh Ironbark Forest of the Sydney Basin Bioregion. It is placed within in the critically endangered category which means it is facing extreme risk of extinction. The Cooks River/Castlereagh Ironbark Forest of the Sydney Basin Bioregion. The same ecological community in the Sydney Basin Bioregion is also listed under the New South Wales Threatened Species Conservation Act 1995.

A small patch of CRCIF occurs in the WestConnex development footprint, as 1.87 Ha of intact forest known as Beverly Grove Bushland is in the project areas.

This CRCIF referred to by the WestConnex is located near Beverly Grove Park, Kingsgrove, NSW, bordering the current M5. This forest type is currently in good health for its location. A cycle path splits the two CRCIF.

Page 13/104 New M5 – Biodiversity Assessment provides some history:

"Surveys in 2014 confirmed the presence of CRCIF in the west of the project corridor, adjacent to Canterbury Golf Course and the M5 Motorway totalling to 1.8 hectares. The CRCIF patch of bushland was intentionally avoided by the original M5 project and is now managed for conservation by Roads and Maritime in accordance with the M5 approval conditions."

If this project proceeds, 1.4 Ha of this forest is expected to be cleared. The EIS attempts to downplay this by noting it is only a small amount of the total area of remnant CRCIF (about 0.1%),

The Assessment then downgrades the importance of this critically endangered forest:

"While this represents a very small proportion, at less than 0.1 per cent, of the total remnant CRCIF vegetation (estimated at 1828 hectares (DotE 2015)) within the Sydney Basin Bioregion, it comprises the majority of CRCIF within the development site."



This CRCIF is a one of countless examples of a forest being reduced to fragments due to human destruction. It was once much larger before the M5 went through, a condition of that was to leave 1.8 hectares of CRCIF. The New M5 seeks to destroy that.

After describing the forest as a remnant, in an extraordinary manipulation on words, the EIS goes on to say of this critically endangered forest:

"The 1.4 hectares to be impacted under the worst case scenario is considered to be of low long-term viability due to its high perimeter to area ratio, isolation from larger patches of remnant bushland, considerable edge effects from the adjacent M5 Motorway (lighting impacts, noise, human disturbance), and the current influence of the adjacent golf course run-off (high nutrients and altered hydrology)."

This is an extraordinary manipulation, particularly given the impacts on this community are far worse than implied.

What is omitted from the EIS is that by reducing the size of this CRCIF a0.47 Ha, it actually reduces the size of the patch to below 0.5 Ha, the critical size threshold for a patch of forest. This means that the remaining patch of bushland will no longer be considered CRCIF, and that the remaining bushland will not be entitled to the 'protection' that should come with being declared a critically endangered ecological community. In effect, the proponents are proposing what would amount to the total destruction of this critically endangered CRCIF, and therefore should have stated that the total loss of extent of CRCIF would be 1.87 Ha or 100% of this last local remnant.

Previously a critically endangered site listed under the EPBC Act would have been independently analysed by the Federal Department of Environment. However early last year, the Federal Minister for the Environment Greg Hunt pushed through a system of delegation from the Department of Environment to state departments. He reached a bilateral agreement with the NSW government to delegate its powers to state Department of Planning approval processes that are are heavily balanced in favour of developers.

The New M5 is subject to the requirements of the NSW Biodiversity Offsets Policy for Major Projects which was approved by the Federal Department as the policy against which a threat to endangered species such as the one to the CIRIF can be considered. This means that the impacts of the new M5 are being assessed within the framework for Biodiversity Assessment (FBA) with the production of a Biodiversity Assessment Report (BAR) and a Biodiversity Offset Strategy (BOS). The BOS outlines the offsets required for unavoidable biodiversity impacts, that is, those residual impacts which remain after impacts have been avoided, minimised and mitigated to the extent that is reasonable and feasible (page ix New M5 EIS Biodiversity Offset Strategy – Executive Summary Appendix T Page 5 sets out the steps taken so far).

What is telling is that the EIS Executive Statement (Appendix T) blatantly states the 'aim of this Biodiversity Offset Strategy (BOS) is to demonstrate that appropriate offsets for the residual impacts to biodiversity are available and can be delivered. In other words, despite no offsets being available, the proponent is confident it is reasonable to destroy the CRCIF in the path of the new M5.

In any case, the options available for BOS are deeply unsatisfactory and would in no way genuinely replace the loss of this mature and critically endangered CRCIF. The NSW Office of Environment and Heritage (OEH)'s Biodiversity Banking and Offsets Scheme, 'BioBanking', is designed to address the loss of biodiversity values from habitat degradation.

It is claimed BioBanking will 'help address the loss of biodiversity values, including threatened species, due to habitat degradation and loss'. But the scheme is not rigorous and has no integrity. Put simply, it is a trading scheme, environment for money. It is wide open to manipulation, making biodiversity offsets a potential sham that do not provide strong protection for the Australian environment.

An offset scheme should have clear parameters. For example, there must be clear demarcation between an offset and a no-go zone to make a clear statement that offsetting is not an appropriate environmental protection strategy. This is never been more essential than when a the destruction of critical habitat and threatened species or ecological communities that can withstand no further loss is under consideration, such as this CRCIF.

It is significant the WestConnex have not been able to find a 'like for like' forest to offset the loss of this CRCIF, because there are none comparable to it. A couple of landholders are said to be perhaps interested in a Biobanking Agreement, but this is all extremely vague and not determined.

The EIS then goes on to state that: *"When a proponent is unable to locate a 'like for like' offset after taking reasonable steps, there is an option for 'supplementary measures.' Supplementary measures are then suggested but there is again no clear information about which might be selected (P9 EIS Executive Statement Appendix T)"*. In fact, it is clear that no certain arrangements would need to be made for offsets until years after approval is given.

This means the proponent is seeking approval to wipe out a condition for the old M5 approval *without providing any detailed justification or even a clear offset policy*.

The NSW Environment and Heritage Department have abrogated their responsibility for protecting the environment and to the citizens of NSW by subsidising the destruction of the very things they should be protecting. The department has effectively made itself redundant by allowing a developer run planning process to replace genuine evidence based biodiversity assessment.

In any case, what is clear from this EIS is that those responsible for its biodiversity study couldn't find another like-for-like for offset bargaining chip, (EIS p193 Biodiversity Assessment Report – BAR – Appendix G), they tried a different tack, using language to

describe the outlook for the forest of low long-term viability to give the impression its loss won't matter as it wouldn't survive anyway. There is no analysis or explanation provided for this claim to support any assertion that the protection the RMS was obliged to provide as a condition for approval for the M5 has failed to prevent the forest from deteriorating.

WAG, however, has received numerous reports from locals and visitors to the area that attest to its healthy state, including this eyewitness account recorded in December 2015:

"When I visited this site in December 2015 and walked between the separated CRCIF forests there were Currawongs everywhere (at least nine), in trees calling or on the ground basking in the sun in relative safety. In between and with the currawongs were honeyeaters (at least four). At the western end Fairy Wrens (at least ten) were more prevalent foraging on the ground and flitting from ground to trees. Insects were audible and visible showing it was a viable habitat.

"I have rarely seen this forest type in my life. The clay is still evident in areas and the Melaleuca within and proximate to moist ground depressions were plenty (see photo below). What I found was a healthy stunning forest opposite to the one described in the EIS which they consider to be of low long term viability. Yet this forest has endured for years regardless of being encroached by edges, cycle-ways or golf courses etc. It is currently protected from degradation by high fences and by the law.

"Some of the trees show a great deal of age and are still thriving. Sadly the M5 will destroy everything…"

The CRCIF at Kingsgrove is a high priority site of conservation significance and an amazing story of survival. It is disappearing fast and needs to be classed as off limits to urban development.

This forest (CRCIF) is irreplaceable for this region of Sydney. The Offset program is an illogical and damaging process espoused by the NSW Government and the NSW Environment and Heritage Department. The State Significant Planning process which heavily favours development should never have been allowed to stand in for the Federal process. The loss of this critically endangered forest takes away a genuine asset (as it should be) and replaces it with a devastatingly sad loss. If this thought process is allowed to continue, it will result in the complete destruction of other critically endangered forest types and animals throughout NSW and Australia.

In addition, as part of the M5 Linear Park, the CRCIF Tserves dual purposes. It is part of an important active transport artery that connects the community to each other, as well as schools, shops and train station. It is also, just simply, a lovely place to walk or cycle aiding both physical and psychological well-being, reducing stress and reconnecting with nature.

An abundance of research shows that trees improve the air, soil and water-quality. They improve mental health and well-being, reduce anger and aggression, and provides a sense of place. Canopy coverage over paved surfaces is a cost-effective means of mitigating heat islands and reducing emissions of hydrocarbons involved in ozone depletion.

With tree canopy in our inner suburbs at a low 16%, the protection of what we have now becomes even more important. Hundreds of people each day use the M5 linear walk. The high patronage makes it a safe place, even late into the evening.

WestConnex plan to destroy this critically endangered woodland. In its place will be a transparent noise wall, the purpose being to “enhance the motorist experience with views across the golf course and Beverly Grove Park”. Not too many people would want to take their walk with a view of 10 lanes of traffic just on the other side of a plastic wall.



WestConnex spells the destruction of not just this unique environment, but the safety and amenity of the overall M5 linear walk.

It represents a significant loss to biodiversity. It represents a significant loss to the people of Beverly Hills and Kingsgrove, who already lost so much when the existing M5 East was built.

Other threats to local forest and bushland

More bad news for the local forest communities, including the CRCIF, is the drawdown of groundwater for the tunnelling associated with this project. The EIS states that the vegetation communities may be dependent on groundwater, and that with the reduction of groundwater, certain plant species may be negatively affected, especially in dry periods. However, what the impacts of the reduction of groundwater on these communities will be is unclear. It should have been fully assessed as part of this EIS.

In addition to the CRCIF to be cleared, a 1.82 Ha patch of threatened Swamp Sclerophyll forest on Kogarah Golf Course will also go, and a grand total of 10.8 Ha of vegetation both native and exotic is highlighted for clearing for this project.

In the present context of climate change, any clearing of vegetation without appropriate revegetation of another area is irresponsible, especially when the vegetation is being cleared for a carbon-producing road.

The Green and Golden Bell Frog

The Green and Golden Bell Frog (GGBF) was once one of the most common frog species found on the east coast of New South Wales and was once abundant in the swampy eastern suburbs of Sydney.

This began to change in the 1970s when the ongoing impacts of habitat loss, habitat degradation and habitat fragmentation were amplified by cumulative effects of urban consolidation and development including roads, cars, pollution, cats, dogs, the introduced plague minnow. Finally, the introduction of the amphibian chytrid fungus (chytridiomycosis) was the final straw for the GGBF, which was now suffering death by

multiple causes. The most common frog in eastern Sydney had become the most endangered by the 1990s.

By this time the GGBF was reduced to a series of small ‘key populations’ scattered along the coastal fringe of New South Wales. Four of these populations were located in Sydney – Arncliffe (Kogarah Golf Course – the population at risk from this development), Homebush Bay, Kurnell and Greenacre. It is now almost 2016 and the situation for the GGBF of Sydney has not improved. With the exception of the Homebush Bay population, which has expanded into newly constructed wetlands throughout Sydney Olympic Park, the remaining populations in Sydney have been ignored and left to dwindle with their habitats largely succumbing to weed invasion and modified water quality. The status of the Greenacre population is unknown, the Kurnell population has suffered apparent extinction and can no longer be found, and the Arncliffe population has managed to just hang on with the most recent population estimates being 30 to 50 adults.

With this being the case the small and fragile Arncliffe population, what may be the second last population of bell frogs in Sydney, is now to be at the centre of a massive four-year development for WestConnex, and this project in particular. The Arncliffe GGBF population is confined to Kogarah Golf Course and the adjacent RMS (formerly RTA) ponds, and occupy an area covering about 40 Ha. For this project, 7.82 Ha of bell frog foraging, dispersal, sheltering and potentially breeding habitat is to be removed from the golf course. This is expected to have “direct impacts” on the GGBF, including: mortality and injury of individuals during clearing of shelter habitat, decommissioning of ponds, during operation of permanent facilities and decreased habitat value of the RMS ponds (where the frogs breed). Decreased habitat value of the RMS pond includes “indirect impacts” of shading, dust, noise, vibration and lighting from the adjacent works. As part of their mitigation measures frog exclusion fencing, translocation and captive breeding have been suggested as solutions.

So what does this mean for the Arncliffe bell frogs? It could very well mean the end for the population. Taking into consideration the population is already very small (<50 individuals over 40 Ha) and entirely restricted to Kogarah Golf Course, the destruction of 7.82 Ha of dispersal habitat, the addition frog exclusion fencing confining individuals

to the area around the RMS ponds and reduced quality of the RMS ponds over four years (or four breeding seasons) can only result in detrimental impacts on the frogs.

The construction on Kogarah Golf Course is occurring immediately adjacent to the RMS ponds on the area of the golf course the frogs most often use for dispersal and occasionally breeding. Given that the GGBF is a widely dispersing species that often utilise different breeding sites (depending on site suitability in different years), confining them all to the one place would likely result in a higher level of cannibalisation - especially of juveniles, which need to be able to disperse away from the pond to avoid the adults.

The suitability of the RMS ponds to see the GGBFs through this tough time must also be considered, if this is where they are expected to breed and survive. The RMS ponds are now over 15 years old, densely covered in vegetation, and did not support any breeding in 2014. GGBFs have shown preference for new ponds with open areas free of vegetation, and require grassy areas adjacent to the pond for foraging. Under the new arrangement the suitability of the RMS ponds to support the bell frogs is severely reduced. GGBFs will only breed in water if the temperature is above 22 degrees, and when ponds are covered in dust and vegetation, reaching this critical temperature for breeding will be problematic.

Loud noise has also been demonstrated to interfere with breeding of larger frog species. With 24-hr construction activities planned that will producing such loud noises and bright lighting all night night, it is likely that the GGBFs will not feel secure enough for breeding to occur, even if the water in the breeding ponds reaches 22 degrees.

If/when the RMS ponds become unsuitable for breeding, the GGBFs may wish to look elsewhere. Again, this will be very difficult for them if the ponds are surrounded by frog exclusion fencing. And if the additional ponds are also removed on the golf course, the GGBFs will be left with nothing.

As colonising species, if any frogs happen to be on the ‘wrong’ side of the frog fencing, any hole in the ground that fills up with water after rain in the construction zone may become the new favourite hangout for the local GGBFs. As an endangered species, this would necessitate a stop work procedure, adding construction delays.

As part of the mitigation measures proposed in this EIS, GGBFs are expected to be translocated off site. However, this rarely works, as frogs will often return directly to the place they are taken from.

The proponent has also suggested captive breeding in this EIS to maintain stock of the frogs while works continue. This may be the only chance the frogs have, but it is incredibly difficult to do properly, due to the aforementioned tendency for adults to cannabalise their young. This is highly likely if juvenile GGBFs could not disperse beyond the frog fencing, and given this is the point of such fencing, it is extremely likely. Any bulk release of tadpoles at the end of the project has also been shown to be a failed strategy.

Despite the mitigation measures proposed, this project is really a disaster for the Arncliffe GGBFs. If death by multiple causes is responsible for the GGBF decline across New South Wales, it is easy to see how death by multiple causes resulting from this WestConnex project is likely to spell the end for the bell frogs here too.

As with the CRCIF, the EIS attempts to downplay the huge threat this project poses to the GGBFs by underplaying the importance of this population of the endangered species. The EIS highlights that there are several populations in Sydney, without referring to the status of each one; it suggests the area of golf course to be developed is not as important to the frogs as it is; and it ignores evidence that as well as being the main area of dispersal and foraging habitat for the GGBFs, the construction area is also likely to be an important additional breeding area.

The EIS states that breeding has not occurred outside the RMS ponds since 2000, but this is untrue. Scientist Grant Webster, who has studied the GGBF population at this site in detail. He was involved in GGBF surveys there between 2006 and 2009 for Cumberland Ecology as part of the former Cooks Cove development proposal.

These surveys were carried out on the Kogarah Golf Course between 2006 and 2009. GGBFs were detected on every occasion at the golf course. The results varied with frogs being detected in four ponds in 2009 and breeding was only evident in one pond.

Mr Webster concluded that there was potential breeding outside the RMS breeding ponds. In the submission he made to the Federal Department of the Environment,

Reference Number: 2015/7520, when the RMS on behalf of the former WDA (now SMC) in relation to this project in July 2015.

As part of this submission, Mr Webster made it clear that out of seven locations where frogs were found, "six of these locations are from ponds on the golf course and five of them are within the zone they have outlined for construction". He records that an amplectant pair was detected in the central ponds, indicating that breeding occurs there, and provided diagrams that showed how closely the distribution of GGBFs overlaps with the proposed New M5 construction site.

Mr Webster also noted in his submission that:

"It is alarming that all the main ponds occupied by bell frogs have been zoned for construction, this construction zone is exactly where the frogs occur on the golf course, and they were not detected more widely despite the entire area being surveyed.

In my opinion if this development were to go ahead as planned it would likely spell the end for the Kogarah population of Green and Golden Bell Frogs."

It is unacceptable that the proponent not only fail to acknowledge receipt this information in this EIS, but also claims that no such breeding activity has taken place as described by Mr Webster since 2000. WAG is aware that no contact has been made with Mr Webster to get more information or verify his claims by the SMC, the RMS, or the authors of the biodiversity study.

Insufficient field surveys

The EIS field surveys (observations in the field) are very limited in duration and season.

Repeated sampling over some time period is really needed to develop anything representing a comprehensive survey. The failure of the proponents of this EIS to conduct this kind of service means it falls well short of what is a satisfactory, let alone a rigorous, survey process.

It is apparent that the EIS flora and fauna surveys would not satisfy the requirements of the NSW Threatened Species Act NSW 1995.



Failure to properly consider the loss of all kinds of vegetation

While the loss of parkland to the New M5 would be significant, the loss of green space this part of the tollway would cause is even worse than stated in the EIS.

The EIS has not quantified the loss in area and nature of vegetation from private gardens and street trees. This should have been done.

It also should have been straightforward to map the coverage and approximate area covered by this private/street vegetation. This was not done. This downplays the role and the extent of vegetation of any sort. Irrespective of whether it is planted or remnant, it is potentially important and can play an ecological role.

The EIS therefore makes no real assessment of the nature and quality of the planted vegetation, which can stand in to some extent for remnant vegetation if well planned and maintained.

All city vegetation is important in the context of preventing, and countering the urban heat island effect, a recognised phenomenon.

There are also urban biodiversity benefits of both planted as well as remnant vegetation well acknowledged by others.

For example, see September 2015 (Vol. 16, No. 3) of *Ecological Management and Restoration (EMR)* (pp. 206-213). Trees and shrubs (the latter of which is not mentioned in the EIS) “have the potential to provide nesting and shelter habitat for common birds and possums” (20-12). The EIS also fails to mention that such vegetation also provides food resources either directly or indirectly. This is a sloppy omission, but again it downplays and limits the vegetation’s role.

The EIS’s failure to quantify or assess the ecological role of private gardens and street plantings means that its comments about vegetation and connectivity do not tell the whole story, and so the potential connectivity (and ‘stepping stones’) that exist via this vegetation is ignored.

Some animal species manage quite well in small and fragmented patches of vegetation, and providing that patch distance is not too great other species are able to move between and utilise such patches.

Suburban gardens are an example of this even where there is no direct house to house connectivity and there are roads and footpaths separating areas; an example animal species would be the once common Superb Blue Wren, a small bird species which moves between home gardens finding necessary resources (nesting sites, shelter, food) quite satisfactorily. Ditto Blue Tongue Lizards, also once common but now in decline in urban areas.

Such gardens act as critical 'stepping stones' for fauna crossing and leaving cities. It is known this does happen, and that it is important for migratory species, such as the Yellow-faced Honeyeaters that make annual migrations through Sydney. Lack of connectivity disadvantages some, but by no means all native species.

Failure to consider cumulative and wider impacts of biodiversity loss

We can't afford to lose more havens for wildlife and biodiversity within highly modified areas such as the area defined by this project footprint than we already have.

This is where cumulative impacts are more acutely felt, and to dismiss them leads to a 'death by a thousand cuts' scenario.

The conservation of urban biodiversity has profound benefits for human wellbeing in regards to physical and psychological health – e.g. Turner et al 2004: *Global Urbanisation and the separation of humans from nature*, Bioscience 54 585-590. Yet the social value to people is not addressed in this EIS at all.

There is also no attempt made in this EIS to assess the loss to biodiversity across the whole WestConnex project, including the M4 widening, King Georges Interchange, M5 duplicate and the linking M4/M5 project. A southern extension and Sydney Gateway is also referred to in the EIS which would threaten wetland. This is a serious deficiency in the EIS, particularly given that the "benefits" of the entire WestConnex and additional motorways such as the F8 are repeatedly cited in the EIS as justification for building the New M5 section.



Conclusion

WAG formally and strongly objects to the negative impact the WestConnex project, including the New M5, will have on Sydney's biodiversity if it is built, and the failure to properly assess these risks in the EIS. We ask the Minister for Planning to reject the WestConnex New M5 project.



14.0 Objection to the destruction of Sydney's heritage

WAG objects to large-scale destruction of heritage areas and buildings cited in the New M5 EIS that WestConnex, including the New M5, will cause. Given the disastrous heritage impacts of the proposed M4 East on Haberfield, the heritage aspects of this project have been to some extent overlooked.

WestConnex will negatively impact on some of Sydney's most important heritage sites, which are zoned as Heritage Conservation Areas by the NSW Government and are significant not only to local communities but to all Australians. Many homes and heritage items are slated for demolition in Ashfield and Haberfield as part of WestConnex Stage 1 and the heritage suburbs of Newtown, St. Peters and Enmore will all be hugely impacted by Stage 2 of the proposed project.

One only has to read the Heritage study to understand the significant loss of history. This is valued by residents who in 2015 organised a history walk. At this walk Nadia Wheatley spoke of the importance of a sense of history and place and of its importance for community links.

Destruction of heritage for the New M5 if built

We endorse the submission of Sarah and Bruce Lay, long term residents. Bruce Lay is an extremely experienced planner and heritage architect.

He raises the important issue of the failure to consider the cumulative heritage should the Stage 3 ever occur. Litlte information has been given about this project which would apparently tunnel under King Street. He notes:

The West Connex proposal is a fragment of the whole, a work in progress, and all will not be done/revealed before critical and likely damaging and hugely costly decisions are made. The M5 connection back to Parramatta Road so vital to Newtown's fate is not revealed or costed. It will inevitably damage the south end of King Street and many other areas along its route. The 8 kilometres of King Street/Enmore Road is the most important and fine inner city commercial streetscape in the City, of State and National significance. The whole is thus in Heritage Conservation Areas in Marrickville and the City of Sydney. It also includes a large collection of individual Heritage Items,

including many at the St Peter's end, within the viewshed/curtilage of the St Peters interchange. and its future un-designed connections.

He continues,

The St Peter's Brickworks themselves are a major landmark in this area enfolded by the now fine new land and waterscape of Sydney Park. The whole is a composite of State significance given the importance of the brickmaking here in terms of building Sydney from about 1880 until the mid-twentieth century, when development of the inner western suburbs was nearly complete. This whole precinct deserves respect, not being carved up and marooned by major roads with limited connections for pedestrian and cycle access. Needless to say many groups of buildings remain to this context along the Princes Highway to Canal Road & Campbell Streets.

These buildings and streetscapes tie this precinct in its setting, its social context and history. There is evident scope to recover its urban context and grain, not to destroy it further.

Not just the 'Bedford Brickworks' the whole area to the eastern side of the Princes Highway south to Canal Road became a major brickmaking and industrial area for building the city of great importance to the history of the city. There were nine brick and tile makers in this stretch, apart from other key industries. Apart from the remains within the park there is important archaeology in this area, now being dug up and carted away without evaluation for expedient reasons. The EIS only examines somewhat loosely the impact on identified heritage and not the uncovered, unexamined evidence of this important history.

Of course the heritage consultant hired to do the EIS does recognise a range of significant impacts including demolition. The real problem is that nothing can ever be serious enough to warrant interference with the project as desired by its proponents.

The heritage and social and economic impacts are clearly linked and should be evaluated in a cumulative way along with the loss of green space, especially Sydney Park which has been designed to highlight the industrial heritage while enhancing the natural environment.



Concerns raised by National Trust of Australia (NSW)

The National Trust raised a number of concerns abut heritage destruction in its 2014 submission to the M4 East concept design, all of which are relevant to the New M5:

- Over the past fifteen years the Trust has continued to express concern at the heritage impacts of inner urban motorway proposals and has supported mass transport options such as light and heavy rail in preference to inner urban motorways.

- While acknowledging that the increased mobility and affluence of our society and an expanding population require much improved transport facilities, the National Trust opposes further motorways being brought into the inner suburbs and central business district if they threaten areas of historical, architectural, scenic and social importance.

- The National Trust believes that the provisions of public/private partnership agreements for urban motorways should be made public and that such agreements must not contain penalty provisions for compensation payments to a motorway operator if a public transport system competes effectively with the motorway.

- The National Trust would oppose public/private agreements that disadvantage the public who do not choose to use the toll roads constructed under those agreements and believes that massive expenditure on motorway development will divert much needed public and private investment away from public transport development which can move large numbers of people more effectively and with much less adverse heritage impact.

- The constant daily movement of large transport trucks severely degrades the urban environment and the National Trust urges that rail transport should be the preferred means for transporting container goods related to Port Botany and Sydney Airport. The Trust would oppose motorway proposals which promote increased large truck movements through urban precincts, particularly those with heritage significance.

- The National Trust acknowledges that inner city motorway development will be inextricably linked to residential/commercial redevelopment of higher densities in the zones adjoining the

- motorway and consequently, would oppose such development, or elements of that redevelopment when it: –

  - *impacts upon, or degrades the values of adjoining, Heritage Conservation Areas*

  - *involves the demolition of Listed Heritage Items*

  - *involves the demolition of places which have been removed from Heritage Lists on non heritage-based grounds*

  - *involves the demolition of places which, in the Trust's view are of indisputable heritage significance, but which have been denied statutory heritage recognition.*

The National Trust has had a long history and involvement in campaigning with the community to protect inner urban heritage.

In 1972 the National Trust opposed the North-Western and Western Expressways which would have cut a swathe through Glebe, demolishing 800 homes and the property "Lyndhurst", to the steps of the Sydney Town Hall.

On 26 February, 2014 the Board of the National Trust of Australia adopted a Policy on the Heritage Impacts of Urban Motorways. This Policy built on and reiterated earlier positions and policy statements including:

- National Trust: Policy Statement on Urban Freeways (1976)
- National Trust Policy on Urban Freeways (1981)
- National Trust Discussion Paper: Towards a Transport Policy for the National Trust (1989)
- National Trust Policy Paper: Transport – The Heritage Implications (1995)
- Trust Alert: Motorway proposals threaten inner city Urban Conservation Areas (2005)

The National Trust also has an extended policy on the heritage impacts of urban motorways. The following excerpt is taken from the 2014 version of this policy:



1. While acknowledging that the increased mobility and affluence of our society and an increasing population require much improved transport facilities, the National Trust will oppose further motorways being brought into the inner suburbs and central business district if they threaten areas of great historical, architectural, scenic and social importance.

2. The National Trust will oppose the loss of public parklands for inner urban motorway construction, including both permanent loss involved with a motorway route/connection ramps or shorter term alienation during the construction phase.

3. The National Trust believes that the provisions of public/private partnership agreements for urban motorways should be made public and that such agreements must not contain penalty provisions for compensation payments to a motorway operator if a public transport system competes effectively with the motorway.

4. The National Trust would oppose public/private agreements that disadvantage the public who do not choose to use the toll roads constructed under those agreements.

5. The National Trust believes that massive expenditure on motorway development will divert much needed public and private investment away from public transport development which can move large numbers of people more effectively and with much less adverse heritage impact.

6. The National Trust believes that the constant daily movement of large transport trucks severely degrades the urban environment and will urge that rail transport should be the preferred means for transporting container goods related to Port Botany and Sydney Airport. The Trust would oppose motorway proposals, which promote increased large truck movements through urban precincts, particularly those with heritage significance.

7. The National Trust acknowledges that inner city motorway development will be inextricably linked to residential/commercial redevelopment of higher densities in the zones adjoining the motorway and consequently would oppose such development or elements of that redevelopment when it:

- impacts upon or degrades the values of adjoining Heritage Conservation Areas,

- involves the demolition of Listed Heritage Items,
- involves the demolition of places which have been removed from Heritage Lists on non heritage- based grounds,
- involves the demolition of places which, in the Trust's view are of indisputable heritage significance but which have been denied statutory heritage recognition.

The National Trust's view is that the heritage impacts of the WestConnex Motorway are severe. WAG agrees with this assessment.

We note that The National Trust also questioned whether the financial commitment for the total project, which are now slated at $16.8 billion and inevitably set to rise, would be much better allocated to public transport, which in all its forms (heavy rail, light rail and buses) has much greater potential to remove motor vehicles from roadways, reducing traffic congestion. WAG agrees with this assessment.

14.3 Conclusion

WAG formally and strongly objects to large-scale destruction of heritage areas and buildings cited in the New M5 EIS that WestConnex, including the New M5, will cause.

WAG also formally and strongly objects to the destruction of Sydney's overall heritage that will be caused by WestConnex, including the New M5, if it is built.

We ask the Minister for Planning to reject the WestConnex New M5 project.



15.0 Objection to Alexandria Landfill impacts and the failure of the EIS to properly assess these impacts

WAG consulted with an environmental scientist with professional experience in the regulation of NSW landfills to prepare this part of our submission and have identified a large number of serious issues with the proposed remediation of the Alexandria Landfill site, the planned construction of the St Peters Interchange on this site, and AECOM's assessment of it:

- The new clean-up notice issued by the Environmental Protection Authority (EPA) is not even mentioned in the EIS. This means that information about sampling, testing and removing asbestos is also not included.
- There are unacceptable high levels of ammonia which would not have been expected from a landfill that supposedly only accepted inert materials. There is no provision for an industrial discharger to allow material to be safely released into the sewer. There is no explanation for this in the EIS.
- Groundwater issues – This EIS outlines an inadequate testing and assurance framework involving potentially dangerous compounds.
- Capping of landfills is a crucial issue during landfill closure. The EIS proposes a level of capping which preferences minimising capping over best practice.
- No discharge license could be found for RMS. If it has no licence, it is illegal.



- No details are provided for how phenolics are being handled. This is a serious oversight.
- No leachate modelling is provided in the EIS. The requirement for this was mentioned many times in the Landfill Guidelines.

These issues occur in the context of long-term problems with the Alexandria Landfill site which have continued since the proponent and then the NSW Roads and Maritime Services (RMS) took over the site. WAG is extremely concerned about these matters, which could directly affect the land, groundwater, and health and safety for thousands of residents and businesses over a long period.

In December 2014, the former WestConnex Delivery Authority forcibly acquired the massive Alexandria Landfill own by Dial a Dump. This is the site on which it plans to build the massive St Peters Interchange. Like all long term landfills, it is a highly polluted site.

The community experienced countless pollution problems with the site during the years that Dial a Dump owned it. Eventually, after a Sydney Morning Herald expose of environmental problems with the site, including that it was used for illegal dumping of asbestos , the NSW Environmental Protection Authority (EPA) issued Clean Up notice to remove asbestos from what is known as Stockpile 21 in the south west corner of the site. When Dial a Dump failed to comply with this notice, the EPA extended the notice.

The asbestos had still not been removed when the proponent quietly and compulsorily acquired the contaminated site. The landfill site closed and the Clean-Up notice lapsed.

Since 2015, the proponent has been moving material including asbestos contaminated waste from the site and taking it to Erskine Park in Sydney's West. There have been serious allegations that the proponent did not have relevant approvals for these activities or for the huge amount of excavation and other work that is being carried out on the site. There have been numerous complaints to the EPA about poor practices in the removal of asbestos and more recently noise complaints due to very loud rock crushing. Legal investigations are continuing into these matters.

After the WestConnex Delivery Authority was turned into the private Sydney Motorway Corporation in October 2015, the land was again transferred to RMS. In November 2015, NSW EPA issued a fresh clean-up notice for Stockpile 21. In fact, residents had observed and photographed activities on this stockpile for many months before the fresh notice had even been issued. There were media reports that the proponent was not consistently following regulations of wetting contaminated soil before removal, both at St Peters and Erskine Park where it was dumped.

In addition to the $13 million of public funds, AECOM has been paid to produce this EIS, it also received an additional contract of nearly $2 million to develop a plan for an

environmentally safe way to close the site. This is an unacceptable conflict of interest, and it would be disturbing if that had any impact on the substandard quality of this analysis.

Detailed objections to issues with this EIS and its assessment of the Alexandria Landfill

1. New Clean-Up notice not mentioned in EIS

The Clean-up notice issued on 6 November 2015 for License 12594 was not mentioned in EIS. The matters raised were discussed with the EPA prior to 6 November and well before the public release of the EIS. Why wasn't this matter included in the EIS?

This Clean up notice requires RMS to:

- commence sampling, testing and removal of asbestos waste material in accordance with the Proposal by no later than 7 December 2015. It is essential that this compliance be reported as part of the EIS program to provide surety for the community that RMS is competently managing this contamination issue. What are the results of this testing?
- must undertake air monitoring carried out for the detection of airborne asbestos fibres in accordance with the Air Monitoring Regime during the removal of any material from Stockpile 21 (asbestos stockpile). These results must be publicly released to provide

residents with confidence that their health has not been compromised. RMS should disclose the results of this testing.

- When sampling, testing and removal of asbestos waste in accordance with this notice is occurring Stockpile 21 must be sectioned off and access restricted to all staff or any other persons. What evidence is there that these security measures were completed in time to meet the conditions of this notice?
- No leachate modelling is set out in the EIS. This was required by the Secretary of Planning

2. Ammonia Release

Ammonia is released in solid waste landfill through protein degradation under anaerobic conditions. If this landfill had been an inert waste landfill and a resource recovery facility for the last 30 years, where did these elevated ammonia concentrations originate? This is evidence that there was a significant putresible component to the waste in the past which means there needs to be a level of protection during closure commensurate with international best practice which includes the NSW Draft Environmental Guidelines: Solid Waste Landfills 2nd edn JN 2015-0111.

Sydney Water's ammonia Trade Waste Limit for the site is 100 mg/L (as NH3-N). The average concentration was reported to be 127 mg/L and the maximum was 404 mg/L. Normally, Sydney Water would require an Industrial discharger to commence a project

to meet their criteria. Failing to do so would mean that the discharge to sewer can no longer continue. The technology to install a simple nitrification cell is not complex and most large landfills and other industrial dischargers with high ammonia levels have these in place. It is unclear why Sydney Water has not made this a specific requirement for the Alexandria Landfill. The EIS did not identify plan B should Sydney Water cancel the discharge license.

Where would RMS dispose of 730,000 litres of leachate a day if it cannot be discharged to sewer?

3. Other Groundwater contamination/Leachate Issues

- Historically, total recoverable hydrocarbons was an indicator parameter used as an inexpensive means to determine what other contaminants may be present. Testing results show that the TRH C34 to C40 concentrations were elevated. Organic contamination in this carbon range includes Polycyclic aromatic hydrocarbons (PAHs). The EIS identified this group of compounds as one of the contaminants of concern following AECOM's Phase 2 investigation. Given this level of contamination and concern noted in the phase 2 investigation, it seems unlikely that Naphthalene was the only PAH detected in the leachate. Were other PAHs tested and identified? If not, why not?



- This project's environmental consultants have contracted Australian Laboratory Services (ALS) as their accredited service provider for analytical testing. Section M3 of EPL licence 4627 requires that all testing be done by methods on NSW EPA's Approved Methods list. ALS sulfate testing is by their in-house method EN/ED041 G (Sulfate by discrete analyser method) which is not on the list of approved methods.
- ALS have a variety of testing methods that are priced on the basis of detection level and sensitivity. Like many other laboratories ALS have a less expensive GCMS option for straight injection of extracted solvent in the GCMS (EP075/76) for quantifying phenol containing compounds. This method routinely under represents many compounds like pentachlorophenol as it requires derivatisation for full quantitation. As this is a more expensive option, inexperienced consultants will choose this compound. It is noted that pentachlorophenol is commonly found in leachate samples found to contain phenol.
- Section 4 of EPA's Landfill Guidelines specify that the ionic balance should be ± 5 %. It was found to be up to 10 % during this assessment which is twice the guideline value. This is seen as another indicator of the poor quality assurance framework and lack of environmental expertise associated with this entire investigation.

4. Closure Cover

- Landfills continue to emit contamination for more than 50 years following site closure. For this reason it is essential to follow prescribed practices to ensure that public health

and the environment are not at risk. Capping (the top layer of a closed landfill) is designed to inhibit infiltration of water through the landfill to ensure that leachate generation is minimised. The NSW EPA established benchmark techniques in the Landfill Guidelines for capping to ensure that all landfills are designed to control environmental emissions. The capping advocated in the M5 EIS has a greater focus on minimising the depth of the capping layer rather than meeting EPA benchmark requirements. As there is evidence that significant putresible waste was received at the facility, it is essential that the capping material meet the requirements from the guidelines that will be in place as it is closed. The EIS purports to include the Landfill Closure and Management Plan (LCMP) but the details in the EIS are inadequate to be considered as a closure plan. The EIS clearly states that the proponents negotiated with the EPA for a closure program which would result in standards that fall well below targets in the Environmental Guidelines: Solid Waste Guidelines. *(Ed: AECOM were paid $2 million in addition to $13 million for the whole EIS to develop this plan.)*

- Looking at the “Alexander landfill Closure Plan Typical Capping Layer” (Figure M5-LDS-SKT-700-320-DR-7805A) as a benchmark, the following deficiencies are noted in relation to the Landfill Guideline Benchmark:
- The Alexander Landfill cap has a re-vegetation level set at 500 mm. The EPA guideline is a revegetation layer at least 1000 mm thick and comprising clean soils and vegetation with root systems that will not penetrate into lower layers. The upper 200 mm should be a topsoil layer, which can include compost to help with vegetative establishment and

growth. The revegetation layer should promote water removal by evapotranspiration and runoff; protect the sealing layer from desiccation and/or damage; and sustain microbial populations that oxidise a proportion of any methane passing up through the cap. Clearly the proposed vegetation level does not meet the benchmark.

- The proposed Alexander Landfill cap has a minimum 500 millimetre thick low permeability material layer with permeability of10^{-8} metres per second. The EPA requirement for solid waste landfills is a composite sealing layer, comprising a lower compacted clay layer and an upper flexible membrane liner. The compacted clay layer should be at least 600 mm thick, with an in-situ saturated hydraulic conductivity of less than 1×10^{-9} m/s. The clay should contain no rock or soil clumps greater than 50 mm in any dimension. The Alexander landfill is 17 % less thick and the permeability is 10 times greater than the benchmark. Using simple maths (83 % x0.1), the Alexander landfill is only about 8.3 % as effective as the guideline benchmark.

- The EPA Landfill Guidelines permit a lower level of protection in only two cases, when there was no putresible waste disposed or landfills located in remote arid zones. This was not the case for the Alexander Landfill.

5. Botany Sands Groundwater Extraction Bores.

- The groundwater collected in the groundwater extraction bores from the landfill was collected in 50,000 L tanks and discharged into the stormwater drains. An examination

of all licences held by RMS could not locate any legal discharge licence near the Alexander Landfill. If RMS does not have a EPL discharge licence than these discharges have been illegal ever since the RMS took control of the site. There is no evidence of any contaminant assessment of these discharges nor comparison compliance with water guideline values.

6. Gas Testing Results

- Table 12 shows vinyl chloride levels as high as 485 ppb in the test samples of landfill gas. This data in 5.6.2.2 is reported without commentary. Since this compound was found at relatively high concentrations in the gas, it is likely that it will be detectable in the ground water and should be tested. Vinyl chloride comes from break down of compounds like trichloroethene and perchloroethene by dehydrohalogenation alkyl halides. For these reasons, not testing nor reporting on the presence of this group of compounds (volatile halocarbons) is seen as an oversight.
- In Section 5.6.2.3 for estimating landfill gas generation rates it was assumed that food waste was removed from the C&I waste stream. This assumption is baseless given the types of gases present and the ammonia level in the landfill leachate. What were the qualifications of the team that made these assumptions? Does a new landfill EIS need to be developed?

7. Table 14

The Landfill Guidelines require phenols be tested as Total phenolics which is identified as the summation of 17 individual phenol-containing compounds identified by USEPA Method 8040 (USEPA 1992). This usually requires GCMS testing following derivatisation in modern accredited laboratories. Many inexperienced consultants often attempt to test for total phenol using the 4 amino-antipyrine (AATP) colourimetric method or GCMS testing without derivatisations since these options are much cheaper. The EIS does not provide details of the specific methods undertaken in this investigation. This is a serious oversight. The 4 AATP method suffers from two problems, it routinely underestimates phenolic concentrations and it does not identify the phenol compound present. Phenol containing compounds have grossly different toxicities so it is important to know which compound is present. Chlorinated phenolics also have lower acceptable concentrations when discharging to sewer.

8. Water Modelling.

Landfill environmental management is centred on the need to control water as it moves through a landfill. There are several management options but to make correct decisions it is necessary to conduct a thorough water modelling assessment to examine the mass balance of water entering the system from above and below. This EIS CLMP did not address the issue or strategy for water modelling. Leachate modelling was identified as a necessary requirement in Section 2.3 of the Landfill Guidelines and was mentioned

over 50 times throughout the guidelines. Failure to provide any real modelling is a a serious oversight.

· As stated previously, vinyl chloride and other halogenated volatiles found in the landfill gas testing should be analysed in the groundwater as these are often a good markers of landfill contaminated groundwater since they are often in the front of the plume.

Conclusion

WAG formally rejects the EIS's assessment of the Alexandria Landfill impacts and requests that the Minister reject this proposal.



16.0 Objection to other local impacts not covered under other objections

Kingsgrove Beverly Hills

The impacts on Kingsgrove and Beverly Hills are of grave concern to WAG. Attacks by the government on the WAG group are designed to hide from the residents of South West Sydney the impacts on their communities. We are concerned, for example, about the residents of Stoney Creek Road who have never been properly consulted or informed about the increase traffic and pollution, they will face as a result of the New M5. Details of information about increased traffic should have been explicitly communicated to them in a range of appropriate community languages.

We have other particular concerns which in the context of the failure of the project to meet major objectives reflect an arrogance towards the liveability of communities affected by the project.

Retention of large earth mound

During the build of the original M5, in consultation with the local residents, a large earth mound was constructed, starting at the end of Garema Circuit, for over 350 metres past Rosebank Ave. This is now at risk. This earth mound improves delineation and noise suppression from the current M5 to a limited extent and provides a home for many birds and other wildlife, which have taken over 15 years since the end of the first stage of the M5 to return. This community has already been carved up by a failed tollway project, we object to the way their neighbourhood is again being destroyed. This impacts should have been considered in the social impact study - The impact and even the anxiety associated with the loss of this small bit of protection cannot be underestimated.

Beverley Grove Park

Beverley Grove Park, a large open space area that is used for many different passive recreational activities. Over the last few years, many young families have moved into these three streets and this is the only open space area that is walking distance for these young families to allow their kids to play & picnic in a safe, car free area. The next closest area is up on busy Moorefields Road (Clemton Park). This is not an option for

most families as it is also an official sporting ground and as such, has many bookings by sporting bodies who obviously have precedence over passive recreation.

These two landscape items together make up the entire greenspace for this local community.

You would expect that any EIS, especially its section on social impacts would pay some attention to the impact of removing such a valuable resource.

A resident and member of WAG Colleen Whinney wrote about what the park meant to the community:

My parents moved into Glamis Street when I was six months old. It was in the mid 1950's and the street was gravel from half way down the hill. Behind the back fence was a huge paddock and the old brick pits. My neighbours two doors up (who are still there and in their 90's), had horses out the back and after school, I'd saddle Star and go riding. One of my favourite rides was along the track by Wolli Creek bush near Earlwood. In winter, we'd light bonfires out in the back paddock and neighbours would get together for dinner behind the glow of the fires, while we kids played. From the age of five, we walked up the hill to MacCallum's Hill public school every day and we walked home. It was a different day for kids back then.

Across the road in the front of our house was a bigger Beverly Grove Park, a rambling parkland that extended to the canal and over to the old Coca Cola factory in Beverly Hills. Little did I know that the forest by the park would be classified as endangered. My father played cricket in the sports fields of Beverly Grove on weekends and neighbourhood kids were active in the park until called inside for dinner. It was an adventure. There were few cars in the sixties and so growing up in my neighbourhood was a kid's dream.

We lost the paddocks in the 1970's to Garema Circuit and my mother was very concerned about the proximity of the factory to our back fence. It was a shame not to be able to enjoy the paddocks, but this was progress.We knew that the bottom of the hill was zoned for the eastern distributor, but Mum always said it was unlikely in her lifetime. That was almost the case.



In the 1990's we received word that the M5 was to commence construction. When my mother saw the plans, she was concerned that no consideration was given to providing underpasses between our side and the south to Kingsgrove railway station and shopping centre and so started her ongoing conversation with the council, state minister for roads, Carl Scully and premier Morris Iemma. The one saving grace was the creation of the earth mound as a noise and visual barrier between us and the motorway. Our Beverly Grove Park got chopped up and we lost a bit of the forest, but the creation of the Linear Walk had improved the walk to the station and over the years, the trees finally got established on the mound. We endured three years of dust during construction and a further five years of more dust and weeds as the mound "matured". It was not pleasant, but the result was liveable.

Today, it's a pretty sight at the bottom of our hill. Birds have made the area home and kids can still play across the road in safety. The days of saddling up the horse at the back have long gone, but the kids are still here. Young families have discovered this little oasis and chosen the raise their families here in Kingsgrove, north of the M5. Now we are to lose it all. The new M5 will convert four lanes to ten and this sanctuary will be gone in the name of progress. So where will the kids play?

This and other similar examples where the EIS argues for being allowed to destroy what was set aside in mitigation, must surely demonstrate that when the agenda is 'tollways' no promises will necessarily hold.

Use of Beverley Grove Park during construction:
WAG rejects this use of this Green Space during construction. The study of impacts does not reflect the importance to the community of this resource. We ask you to consider this and a range of other what might seem like smaller issues in the context of the project to meet its overall objectives.

Construction Traffic Movements around Kingsgrove North Construction Site (C1):
We reject the idea of using Garema Circuit for up to 24 hours a day to haul large volumes of soil from the tunnel construction point. Due to the proximity to private housing on the west side, the noise impacts on local residents are unacceptable. We do not find the health risks to be acceptable.



The Use of Transparent Noise Barriers between Garema Circuit & Canterbury Golf Course:
In 'New M5 EIS Vol 1B Chapter 14 Visual Impact & Urban Design' it states that this community will be granted a "transparent noise barrier around 4 metres high". This is completely unacceptable. Residents do not want to see traffic passing by our houses & parkland to slightly improve the visual aspect for motorists. This whole suggestion provides an excellent example of how this whole project priortises needs of motorists and creates car dependency above the needs of impacted communities.

Air quality of schools, parks and community facilities.

It is clear from the air quality data that Beverly Hills North Public School is already exposed to fine particulate pollution which is high compared to most of Sydney. We can see that this will be higher after the project. We do not believe that sufficient information about the impacts on this school and others in the area have been passed to parents and staff at the school. This applies to other schools in the area as well. As we have explained above the presentation of the AIr quality data is unsatisfactory and when asked at an EIS exhibition to supply actual figures, an RMS air quality person was unable to do this.

Conclusion

WAG objects these impacts and asks that the Minister reject this proposal.

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[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Content:
HOW CAN THE GOVERNMENT THINK THAT DESTROYING AND POLLUTING OUR ENVIROMENT IS A GOOD THING???
The New M5 and whole westconnex will be a massive contributor to greenhouse gas emissions, while destroying important habitat and greenspace. There is NO safe level of fine particle exposure. Through this project and the entire WestCONnex of which it is part, the NSW Government is consciously building a project that it knows will worsen already high levels of pollution in parts of the inner west and south-west Sydney.
Just many more reasons to object to the westconnex

[redacted]

[redacted]

[redacted]

Secretary
Department of Planning and Environment
Box 39, Sydney NSW 2001

Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5 : Date 23-24 Jan 2016

I make this submission in response to the Westconnex M5 Environmental Impact Statement (EIS). I object to the project and the whole WestConnex because:

- There is no independent assessment of traffic modelling. The Sydney Motorway Corporation claims its model has been peer reviewed but refuses to publish the review or the assumptions on which it is based; independent traffic planners cannot test its results.
- Westconnex will not release its full assumptions on which it is based so that Councils and independent experts can test its predictions.
- The cost of Westconnex is escalating at a rate of $2 billion a year
- There has been no genuine consultation with the community.
- The New M5 will dump over 100,000 cars and trucks,many of which will end up on local streets into Newtown, Erskineville, Alexandria and Enmore. This is not by accident – it is intentional.
- I strongly object to the quality of the EIS. There is too little information on the traffic volumes that will occur in Alexandria, and there is also conflicting information on possible mitigation strategies. Although the diagrams in the EIS show right-hand turn lanes in all four directions at the Sydney Park Road/Euston Road intersection, the text of "New M5 EIS Vol 2B App G Traffic and Transport" instead indicates that there will be a "banned right turn from Mitchell Road into Sydney Park Road [because of] the banned right turn southbound at the Sydney Park Road / Euston Road intersection". The text also indicates that there will be a "north-bound lane [which] will go as far as Maddox Street, where it becomes a new left-hand turn lane", but the diagrams do not show this. Not having clarity on which of these two scenarios is planned makes informed consultation impossible. If these right-hand turns into Sydney Park Road are not permitted, there will be enormous volumes of traffic on local roads as drivers try to rat run. Likewise, the extra left-hand turn lane, if it is actually planned, seems destined to drive traffic onto local roads.
- Westconnex has failed to consult with businesses in King St Newtown and other parts of the Inner West. These businesses are part of a thriving economy and street life that would be destroyed by increased traffic and imposition of inevitable clearways.
- No details have been released on the route of the M4/M5 and how it will affect suburbs - e.g there is no information about where mid point tunnelling would take place, nor where smoke stacks will be required for the tunnels between St Peters and Camperdown.
- Westconnex has consistently underestimated the traffic that will be induced but its tollway projects; when these projects failed Sydney will be left with traffic pollution
- Thousands of diesel trucks will carry spoil at all times, *including peak times, leading to great disruption* of local and regional road networks.
- Westconnex will not release its full assumptions on which it is based so that Councils and independent experts can test its predictions.
- It is not clear whether massive proposed increases in population in the Inner Sydney have been taken into account in traffic congestion predictions
- No noise modelling has been done for how residents living above two stories will be affected
- Billions of dollars of construction contracts have been let before this EIS was lodged.

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Please publish this submission on the NSW Department of Planning and Environment website

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Please publish this submission on the NSW Department of Planning and Environment website

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Department of Planning and Environment
Box 39, Sydney NSW 2001

12835

Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5 :

I object to the project and the whole WestConnex because:

Westconnex has made no effort whatsoever to consult or hold meetings or information sessions with businesses and shops in the thriving Newtown, Enmore, Erskineville, Alexandria areas.

The EIS states (15-48) that *"King Street and Enmore Road business precinct contains numerous businesses, including retail, services, restaurants and cafes. The project does not propose to modify King Street, including speed limits or on-street parking arrangements along King Street. In future years, traffic modelling indicates that King Street is expected in most cases to experience reduced peak hour volumes under the 2021 'with project' scenario and 2031 cumulative scenario when compared to the without project scenario (refer to Technical Working Paper: Traffic and transport (Appendix G). The exception to this would occur in the 2031 cumulative case, where AM peak hour volumes southbound would increase by around 35 per cent when compared to the 'without project' scenario. However, this is in the opposing direction to the dominant AM peak hour and is within the design carrying capacity of the road. As there would not be any significant changes to traffic volumes or no modifications to King Street are proposed as part of this project, the project would not have a significant impact on businesses or amenity along King Street"*

a) These assertions are made with great certainty but are nothing more than a fabrication when the M4-M5 link – Haberfield to St Peters is only "*undergoing concept development and subject to planning approval*" and no details are included in the EIS.
b) Westconnex has not issued the assumptions and the modelling parameters on which they are basing these statements, so their accurancy cannot be tested by independent experts.
c) Each Stage of the project is being assessed separately, but the impact of each project is being considered in the context of the wider Westconnex program of works. No data has been provided as to what happens to King Street and surrounding areas in Stage 2 **IS** built and Stage 3 **NOT** built.
d) No details whatsoever have been released about how the supposed 'Sydney Gateway' ("*undergoing concept development*") will alleviate traffic level concerns in King Street, Enmore Road, Edgeware Road, Euston Road, Mitchell Street, Maddox Street, and other local roads.

The EIS states (15-46) that *"parking along Euston Road would be provided during off-peak periods. However, by around 2031, the traffic performance demands along Euston Road may require all lanes to be available for traffic and off-peak parking may need to be removed.* ***The removal of carparking would be to the discretion of Roads and Maritime****".*

This confirms that the inevitable increase in traffic on already overcrowded local road networks can only be solved through the imposition of clearways by Roads and Maritime, decimating hundreds of businesses in King Street Newtown, Euston Road, Mitchell Road, Edgeware Road.

.....

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Please publish this submission on the NSW Department of Planning and Environment website

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12836

Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5 : Date 23-24 Jan 2016

I make this submission in response to the Westconnex M5 Environmental Impact Statement (EIS). I object to the project and the whole WestConnex because:

- The whole Westconnex system of tollways will worsen traffic congestion in Inner Sydney. Western Sydney will be left with inadequate public transport and expensive tolls.
- The cost of Westconnex is escalating at a rate of $2 billion a year & has already reached $17 billion.
- There has been no genuine consultation with the community. The consultation period for the 8000 page EIS has taken place over the summer holidays. There has been no exhibition in Alexandria, Newtown, Erskineville or Enmore.
- In the public interest, there should be an independent EIS. AECOM, the company paid $13 to do the EIS works alongside Westconnex and has multiple contracts in the project design and construction.
- Traffic on Euston Road would increase by 12 times with the project. In morning peak, 11 major intersections in Alexandria & St Peters would be the same or worse after the New M5 is built in 2021, & in 2031, even assuming the entire Westconnex system is built. The same would occur in Kingsgrove.
- In fact the situation will be even worse as independent transport experts say that Westconnex has consistently underestimated the traffic that will be induced by its tollways.
- Westconnex acknowledges that local roads in Alexandria & Erskineville won't have the capacity to deal with traffic by 2021.
- The EIS provides no solid evidence for its rejection of alternatives including a combination of better traffic management and public transport.
- Westconnex will destroy hundreds of paperbark trees in Euston Road, which will be turned into a major highway carrying 12 times as much traffic a day as currently, passing within two metres of residents' homes. This is completely unacceptable.
- People living within 500 metres of a major roads have an increased risk of lung and heart disease. Residents around the planned St Peters Interchange and exits at Kingsgrove/Beverly Hills are already exposed to occasional levels of air pollution that exceed national guidelines. These levels can only worsen in these and other congested areas. There has been no local roadside monitoring.
- Thousands of residents will be affected by noise at levels, which can impact on health. There are no firm proposals for mitigation. No noise modelling has been done for residents living above 2 stories.
- This project will permanently destroy 11,000 square metres of Sydney Park, turn large parts of it into construction compounds for years, and expose the rest of the park to vehicle fumes and noise. This area already has one of the lowest amounts of public open space per person in Australia, and to destroy so much of for a toll road is unacceptable.
- The AECOM EIS team didn't consult with businesses in King St Newtown, Erskineville, St Peters and other parts of the Inner West. These businesses are part of a thriving economy that would be destroyed by increased traffic.
- Thousands of diesel trucks will carry spoil 24 hours a day, including peak times, leading to great disruption of local and regional road networks.
- Hundreds of tenants and homeowners have been forced out of their homes before the EIS was even lodged. Heritage buildings are being destroyed and St Peters decimated.
- It is likely a rare endangered colony of Green and Golden Bells frogs at Arncliffe will be destroyed.

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- There is no independent assessment of traffic modelling. The Sydney Motorway Corporation claims its model has been peer reviewed but refuses to publish the review or the assumptions on which it is based; independent traffic planners cannot test its results.
- Westconnex will not release its full assumptions on which it is based so that Councils and independent experts can test its predictions.
- The cost of Westconnex is escalating at a rate of $2 billion a year
- There has been no genuine consultation with the community.
- The New M5 will dump over 100,000 cars and trucks,many of which will end up on local streets into Newtown, Erskineville, Alexandria and Enmore. This is not by accident – it is intentional.
- I strongly object to the quality of the EIS. There is too little information on the traffic volumes that will occur in Alexandria, and there is also conflicting information on possible mitigation strategies. Although the diagrams in the EIS show right-hand turn lanes in all four directions at the Sydney Park Road/Euston Road intersection, the text of "New M5 EIS Vol 2B App G Traffic and Transport" instead indicates that there will be a "banned right turn from Mitchell Road into Sydney Park Road [because of] the banned right turn southbound at the Sydney Park Road / Euston Road intersection". The text also indicates that there will be a "north-bound lane [which] will go as far as Maddox Street, where it becomes a new left-hand turn lane", but the diagrams do not show this. Not having clarity on which of these two scenarios is planned makes informed consultation impossible. If these right-hand turns into Sydney Park Road are not permitted, there will be enormous volumes of traffic on local roads as drivers try to rat run. Likewise, the extra left-hand turn lane, if it is actually planned, seems destined to drive traffic onto local roads.
- Westconnex has failed to consult with businesses in King St Newtown and other parts of the Inner West. These businesses are part of a thriving economy and street life that would be destroyed by increased traffic and imposition of inevitable clearways.
- No details have been released on the route of the M4/M5 and how it will affect suburbs - e.g there is no information about where mid point tunnelling would take place, nor where smoke stacks will be required for the tunnels between St Peters and Camperdown.
- Westconnex has consistently underestimated the traffic that will be induced but its tollway projects; when these projects failed Sydney will be left with traffic pollution
- Thousands of diesel trucks will carry spoil at all times, including peak times, leading to great disruption of local and regional road networks.
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- It is not clear whether massive proposed increases in population in the Inner Sydney have been taken into account in traffic congestion predictions
- No noise modelling has been done for how residents living above two stories will be affected
- Billions of dollars of construction contracts have been let before this EIS was lodged.

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Name: SUSANNE RIEDL Suburb: ALEXANDRIA Postcode: 2015
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I make this submission in response to the Westconnex M5 Environmental Impact Statement (EIS). I object to the project and the whole WestConnex because:

A. The suggestion that tunneling activities would need to be conducted 24 hours per day, seven days a week, including associated activities such as spoil handling and haulage is not justified, This will place great pressure on significant numbers of nearby residents throughout day and night-time periods.
B. Tunnelling would cause vibration and damage to homes. The EIS says it will only be for a short period but does not say what a short period is.
C. The EIS repeatedly says that threats to the liveable environment of residents during construction and operation would be subject to plans developed later. These plans should be available in the EIS.
D. AECOM's analysis of 'alternatives' provides no solid evidence. A combination of demand management of traffic and new public transport projects, especially for the western Sydney should have been explored.
E. Unfiltered ventilation stacks should not be used when safer filtered stacks are being used in other parts of the world. I am particularly concerned about residents on hills and in high buildings in Kingsgrove. St Peters, Arncliffe and Alexandria.
F. The flaws and optimistic assumptions in the traffic modelling mean that toll revenue is likely to be significantly lower than forecast. AECOM has a history of providing over-optimistic traffic forecasts for toll roads, resulting in previous financial failures (e.g., Clem7).
G. Tollways are not a solution. The average daily travel time in Sydney has been stable at about 80 minutes per person for decades, while the average trip distance has increased substantially. In this time, billions have been spent on tollways. Travellers are spending more than ever on tolls, yet are not spending any less time travelling.
H. The project will cause immense social harm. It will destroy long-established communities. It will cause an increase in air pollution-related deaths and illnesses. The increase in air pollution will further inhibit lung and nervous system development in children.
I. Tunnelling would expose residents to property damage and in some cases would occur only 20 metres below the house. This is not acceptable.
J. There are numerous ways of spending $17 billion that would deliver a much greater social and economic benefit, and would not cause so much destruction.
K. The social impact study is little more than a 'cut and paste' job and is insulting to communities where hundreds of tenants and owners have lost homes and others will live in decimated communities.
L. Usage of the M5 is not growing, and has not grown for some years. This project only makes an existing road more expensive for commuters. It will save little time, if any, and at an exorbitant price. As the EIS acknowledges, the tolls are going to force drivers off the M5 and onto local roads, and no wonder. The Updated Strategic Business Case shows that for almost all of its users, the Value of Time saved is less than the cost of using WestConnex.

Name: Karen Rose Suburb: Erskineville Postcode: 2043
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- There has been no genuine consultation with the community.
- The New M5 will dump over 100,000 cars and trucks,many of which will end up on local streets into Newtown, Erskineville, Alexandria and Enmore. This is not by accident – it is intentional.
- I strongly object to the quality of the EIS. There is too little information on the traffic volumes that will occur in Alexandria, and there is also conflicting information on possible mitigation strategies. Although the diagrams in the EIS show right-hand turn lanes in all four directions at the Sydney Park Road/Euston Road intersection, the text of "New M5 EIS Vol 2B App G Traffic and Transport" instead indicates that there will be a "banned right turn from Mitchell Road into Sydney Park Road [because of] the banned right turn southbound at the Sydney Park Road / Euston Road intersection". The text also indicates that there will be a "north-bound lane [which] will go as far as Maddox Street, where it becomes a new left-hand turn lane", but the diagrams do not show this. Not having clarity on which of these two scenarios is planned makes informed consultation impossible. If these right-hand turns into Sydney Park Road are not permitted, there will be enormous volumes of traffic on local roads as drivers try to rat run. Likewise, the extra left-hand turn lane, if it is actually planned, seems destined to drive traffic onto local roads.
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- Billions of dollars of construction contracts have been let before this EIS was lodged.

Name: MARTA LOZINA Suburb: EASTLAKES Postcode: 2018
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12841

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- Tunnelling would expose residents to property damage and in some cases would occur only 20 metres below the house. This is not acceptable.
- There are numerous ways of spending $17 billion that would deliver a much greater social and economic benefit, and would not cause so much destruction.
- The social impact study is little more than a 'cut and paste' job and is insulting to communities where hundreds of tenants and owners have lost homes and others will live in decimated communities.
- Usage of the M5 is not growing, and has not grown for some years. This project only makes an existing road more expensive for commuters. It will save little time, if any, and at an exorbitant price. As the EIS acknowledges, the tolls are going to force drivers off the M5 and onto local roads, and no wonder. The Updated Strategic Business Case shows that for almost all of its users, the Value of Time saved is less than the cost of using WestConnex.

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i. The air quality study shows that some communities will be exposed to increased doses of dangerous pollution, especially those living close to surface roads.

ii. Westconnex will cause costly traffic chaos throughout the Inner West. It is unacceptable that no traffic modelling was done past two intersections after the end of the project.

iii. There is already flooding at St Peters when there are rain storms. Councils have already found that the flooding modelling is not acceptable for the M4 East and the same approach has been used for the M5.

iv. Experts have not been available at very limited EIS sessions. None were held in Newtown, Alexandria or Erskineville.

v. Residents are being forced out of homes at below market prices before approval has been given for the project.

vi. Most of the information about how Westconnex will deal with the negative impacts on residents, businesses and schools is pushed off to the post planning approval stage. This is unreasonable and leaves many in a state of great uncertainty.

vii. The roads around the St Peters interchange are already at an unacceptable Level of Service and are getting worse because of in-fill developments not allowed for by the EIS: Green Square: 61,000 residents. Ashmore: 6,000 residents. Waterloo Estate: 30,000 residents.Central 2 Eveleigh: 56,000 residents, 25,000 workers. With an extra 150,000 people in an area of a few square kilometres, this is going to be the most densely populated area in Australia. There is no evidence that the traffic models have factored in this huge increase in density that will occur in the area.

viii. According to the business case, Euston Road is supposed to handle 61,000 cars on 3 lanes each way. This is almost 10 times what it can handle on 2 lanes. There is no way it can handle 61,000 cars, however many lanes are added to it. 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 increase damage done to the area and cause rat-running.

ix. 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.

x. 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.

xi. 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 the Alexandria and Erskineville area to help residents cope with the massive rise in density that they are facing over the next ten years.

xii. Westconnex is no solution to traffic congestion as the EIS shows that several intersections across the project route will remain at Level of Service F (the worst) after the project.

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6) I strongly object to the quality of the EIS. There is too little information on the traffic volumes that will occur in Alexandria, and there is also conflicting information on possible mitigation strategies. Although the diagrams in the EIS show right-hand turn lanes in all four directions at the Sydney Park Road/Euston Road intersection, the text of "New M5 EIS Vol 2B App G Traffic and Transport" instead indicates that there will be a "banned right turn from Mitchell Road into Sydney Park Road [because of] the banned right turn southbound at the Sydney Park Road / Euston Road intersection". The text also indicates that there will be a "north-bound lane [which] will go as far as Maddox Street, where it becomes a new left-hand turn lane", but the diagrams do not show this. Not having clarity on which of these two scenarios is planned makes informed consultation impossible. If these right-hand turns into Sydney Park Road are not permitted, there will be enormous volumes of traffic on local roads as drivers try to rat run. Likewise, the extra left-hand turn lane, if it is actually planned, seems destined to drive traffic onto local roads.
7) Westconnex has failed to consult with businesses in King St Newtown and other parts of the Inner West. These businesses are part of a thriving economy and street life that would be destroyed by increased traffic and imposition of inevitable clearways.
8) No details have been released on the route of the M4/M5 and how it will affect suburbs - e.g there is no information about where mid point tunnelling would take place, nor where smoke stacks will be required for the tunnels between St Peters and Camperdown.
9) Westconnex has consistently underestimated the traffic that will be induced but its tollway projects; when these projects failed Sydney will be left with traffic pollution
10) Thousands of diesel trucks will carry spoil at all times, including peak times, leading to great disruption of local and regional road networks.
11) Westconnex will not release its full assumptions on which it is based so that Councils and independent experts can test its predictions.
12) It is not clear whether massive proposed increases in population in the Inner Sydney have been taken into account in traffic congestion predictions
13) No noise modelling has been done for how residents living above two stories will be affected
14) Billions of dollars of construction contracts have been let before this EIS was lodged.

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Please publish this submission on the NSW Department of Planning and Environment website

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12846

Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5 : Date 23-24 Jan 2016

I make this submission in response to the Westconnex M5 Environmental Impact Statement (EIS). I object to the project and the whole WestConnex because:

- The whole Westconnex system of tollways will worsen traffic congestion in Inner Sydney. Western Sydney will be left with inadequate public transport and expensive tolls.
- The cost of Westconnex is escalating at a rate of $2 billion a year & has already reached $17 billion.
- There has been no genuine consultation with the community. The consultation period for the 8000 page EIS has taken place over the summer holidays. There has been no exhibition in Alexandria, Newtown, Erskineville or Enmore.
- In the public interest, there should be an independent EIS. AECOM, the company paid $13 to do the EIS works alongside Westconnex and has multiple contracts in the project design and construction.
- Traffic on Euston Road would increase by 12 times with the project. In morning peak, 11 major intersections in Alexandria & St Peters would be the same or worse after the New M5 is built in 2021, & in 2031, even assuming the entire Westconnex system is built. The same would occur in Kingsgrove.
- In fact the situation will be even worse as independent transport experts say that Westconnex has consistently underestimated the traffic that will be induced by its tollways.
- Westconnex acknowledges that local roads in Alexandria & Erskineville won't have the capacity to deal with traffic by 2021.
- The EIS provides no solid evidence for its rejection of alternatives including a combination of better traffic management and public transport.
- Westconnex will destroy hundreds of paperbark trees in Euston Road, which will be turned into a major highway carrying 12 times as much traffic a day as currently, passing within two metres of residents' homes. This is completely unacceptable.
- People living within 500 metres of a major roads have an increased risk of lung and heart disease. Residents around the planned St Peters Interchange and exits at Kingsgrove/Beverly Hills are already exposed to occasional levels of air pollution that exceed national guidelines. These levels can only worsen in these and other congested areas. There has been no local roadside monitoring.
- Thousands of residents will be affected by noise at levels, which can impact on health. There are no firm proposals for mitigation. No noise modelling has been done for residents living above 2 stories.
- This project will permanently destroy 11,000 square metres of Sydney Park, turn large parts of it into construction compounds for years, and expose the rest of the park to vehicle fumes and noise. This area already has one of the lowest amounts of public open space per person in Australia, and to destroy so much of for a toll road is unacceptable.
- The AECOM EIS team didn't consult with businesses in King St Newtown, Erskineville, St Peters and other parts of the Inner West. These businesses are part of a thriving economy that would be destroyed by increased traffic.
- Thousands of diesel trucks will carry spoil 24 hours a day, including peak times, leading to great disruption of local and regional road networks.
- Hundreds of tenants and homeowners have been forced out of their homes before the EIS was even lodged. Heritage buildings are being destroyed and St Peters decimated.
- It is likely a rare endangered colony of Green and Golden Bells frogs at Arncliffe will be destroyed.

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- There is no independent assessment of traffic modelling. The Sydney Motorway Corporation claims its model has been peer reviewed but refuses to publish the review or the assumptions on which it is based; independent traffic planners cannot test its results.
- Westconnex will not release its full assumptions on which it is based so that Councils and independent experts can test its predictions.
- The cost of Westconnex is escalating at a rate of $2 billion a year
- There has been no genuine consultation with the community.
- The New M5 will dump over 100,000 cars and trucks,many of which will end up on local streets into Newtown, Erskineville, Alexandria and Enmore. This is not by accident – it is intentional.
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- It is not clear whether massive proposed increases in population in the Inner Sydney have been taken into account in traffic congestion predictions
- No noise modelling has been done for how residents living above two stories will be affected
- Billions of dollars of construction contracts have been let before this EIS was lodged.

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12849

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Box 39, Sydney NSW 2001

Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5 : Date 23-24 Jan 2016

I make this submission in response to the Westconnex M5 Environmental Impact Statement (EIS). I object to the project and the whole WestConnex because:

A. The suggestion that tunneling activities would need to be conducted 24 hours per day, seven days a week, including associated activities such as spoil handling and haulage is not justified, This will place great pressure on significant numbers of nearby residents throughout day and night-time periods.
B. Tunnelling would cause vibration and damage to homes. The EIS says it will only be for a short period but does not say what a short period is.
C. The EIS repeatedly says that threats to the liveable environment of residents during construction and operation would be subject to plans developed later. These plans should be available in the EIS.
D. AECOM's analysis of 'alternatives' provides no solid evidence. A combination of demand management of traffic and new public transport projects, especially for the western Sydney should have been explored.
E. Unfiltered ventilation stacks should not be used when safer filtered stacks are being used in other parts of the world. I am particularly concerned about residents on hills and in high buildings in Kingsgrove. St Peters, Arncliffe and Alexandria.
F. The flaws and optimistic assumptions in the traffic modelling mean that toll revenue is likely to be significantly lower than forecast. AECOM has a history of providing over-optimistic traffic forecasts for toll roads, resulting in previous financial failures (e.g., Clem7).
G. Tollways are not a solution. The average daily travel time in Sydney has been stable at about 80 minutes per person for decades, while the average trip distance has increased substantially. In this time, billions have been spent on tollways. Travellers are spending more than ever on tolls, yet are not spending any less time travelling.
H. The project will cause immense social harm. It will destroy long-established communities. It will cause an increase in air pollution-related deaths and illnesses. The increase in air pollution will further inhibit lung and nervous system development in children.
I. Tunnelling would expose residents to property damage and in some cases would occur only 20 metres below the house. This is not acceptable.
J. There are numerous ways of spending $17 billion that would deliver a much greater social and economic benefit, and would not cause so much destruction.
K. The social impact study is little more than a 'cut and paste' job and is insulting to communities where hundreds of tenants and owners have lost homes and others will live in decimated communities.
L. Usage of the M5 is not growing, and has not grown for some years. This project only makes an existing road more expensive for commuters. It will save little time, if any, and at an exorbitant price. As the EIS acknowledges, the tolls are going to force drivers off the M5 and onto local roads, and no wonder. The Updated Strategic Business Case shows that for almost all of its users, the Value of Time saved is less than the cost of using WestConnex.

Name: Karen Rose Suburb: Erskineville Postcode: 2043
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12852

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- No noise modelling has been done for how residents living above two stories will be affected
- Billions of dollars of construction contracts have been let before this EIS was lodged.

Name: MARTA LOZINA Suburb: EASTLAKES Postcode: 2018
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- The EIS repeatedly says that threats to the liveable environment of residents during construction and operation would be subject to plans developed later. These plans should be available in the EIS.
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- Unfiltered ventilation stacks should not be used when safer filtered stacks are being used in other parts of the world. I am particularly concerned about residents on hills and in high buildings in Kingsgrove. St Peters, Arncliffe and Alexandria.
- The flaws and optimistic assumptions in the traffic modelling mean that toll revenue is likely to be significantly lower than forecast. AECOM has a history of providing over-optimistic traffic forecasts for toll roads, resulting in previous financial failures (e.g., Clem7).
- Tollways are not a solution. The average daily travel time in Sydney has been stable at about 80 minutes per person for decades, while the average trip distance has increased substantially. In this time, billions have been spent on tollways. Travellers are spending more than ever on tolls, yet are not spending any less time travelling.
- The project will cause immense social harm. It will destroy long-established communities. It will cause an increase in air pollution-related deaths and illnesses. The increase in air pollution will further inhibit lung and nervous system development in children.
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- There are numerous ways of spending $17 billion that would deliver a much greater social and economic benefit, and would not cause so much destruction.
- The social impact study is little more than a 'cut and paste' job and is insulting to communities where hundreds of tenants and owners have lost homes and others will live in decimated communities.
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12854

Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5 : Date 23-24 Jan 2016

I make this submission in response to the Westconnex M5 Environmental Impact Statement (EIS). I object to the project and the whole WestConnex because:

A. **This EIS is fundamentally flawed in that the tunnels between King Georges Road and Bexley Road and Arncliffe are being built as 3 lanes wide but marked as 2 only, with any increase to 3 lane usage subject to another EIS. This indicates that the engineering of the tunnels and ventilation, and the impact on local communities, is 50% understated in this EIS.**
B. **This EIS is fundamentally flawed in that the tunnels between Arncliffe and St Peters are being built as 5 lanes wide but marked as 2 only, with any increase to 3, 4, or 5 lane usage subject to another EIS. This indicates that the engineering of the tunnels and ventilation, and the impact on local communities, is potentially 80% understated in this EIS for 5 lane usage.**
C. **Local road upgrades just outside the project footprint included in this EIS are excluded totally from this EIS as regards costs, health, traffic modeling, and social and economic impacts. The 7 lane Euston Road between Sydney Park Road and Maddox Street narrowing to 4 lanes can mean only further forced property acquisitions along Euston / McEvoy to increase the road capacity and/or imposition of 24 hour clearways. The same situation arises for local roads coming off the St Peters Interchange such as Campbell Street 7 lanes into Unwins Bridge 4 lanes into Edgeware Road 2 lanes with current parking.**
D. **This EIS refers continually to implementation of the entire Westconnex project, but contains no detailed information about Stage 3 and therefore the costs, health, traffic modeling, and social and economic impacts if (1) it is indeed financed and built and (2) if it is not built.**
E. **The Minister has continually indicated that the entire Westconnex project simply does not make sense unless Stage 3 is built. But this EIS operates on the assumption this as yet unfinanced stage will be built. Why are these 'non-construction of Stage 3' impacts not explored in full in this decision making process for Stage 2 ?**
F. **The EIS refers to benefits 'if a future Sydney Gateway project proceeds'. No details have been provided in the EIS as to what this even is, let alone what the costs, health, traffic modeling, and social and economic impacts on local communities may be?**
G. **Westconnex has stated in community meetings that detailed traffic modeling has been done for various intersections (Sydney Park Road / Euston ; Sydney Park Road / Huntley; Euston / Maddox; Sydney Park Road / Mitchell Road) but these have not been published in the EIS. This means the impacts on Erskinville, Alexandria and Newtown cannot be analysed in this EIS.**
H. **Westconnex has acknowledged in community meetings there will two 'on demand' pedestrian crossings on Euston Road between Campbell Street and Sydney Park Road intersection. This will result in a back up of traffic on what is meant to be an 80 kph roadway. This makes no engineering nor traffic management sense.**
I. **Westconnex has acknowledged in community meetings there will be a centre lane on Euston Road between Campbell Street and Sydney Park Road intersection to allow trucks to turn into both eastern and western industrial properties. It is inevitable that the many trucks doing so will require management by traffic lights, further slowing down the projected 50,000 per day traffic flow along this section of Euston Road.**

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a) The air quality study shows that some communities will be exposed to increased doses of dangerous pollution, especially those living close to surface roads.
b) *Westconnex will cause costly traffic chaos throughout the Inner West. It is unacceptable that no traffic* modelling was done past two intersections after the end of the project.
c) There is already flooding at St Peters when there are rain storms. Councils have already found that the flooding modelling is not acceptable for the M4 East and the same approach has been used for the M5.
d) Experts have not been available at very limited EIS sessions. None were held in Newtown, Alexandria or Erskineville.
e) Residents are being forced out of homes at below market prices before approval has been given for the project.
f) Most of the information about how Westconnex will deal with the negative impacts on residents, businesses and schools is pushed off to the post planning approval stage. This is unreasonable and leaves many in a state of great uncertainty.
g) The roads around the St Peters interchange are already at an unacceptable Level of Service and are getting worse because of in-fill developments not allowed for by the EIS: Green Square: 61,000 residents. Ashmore: 6,000 residents. Waterloo Estate: 30,000 residents.Central 2 Eveleigh: 56,000 residents, 25,000 workers. With an extra 150,000 people in an area of a few square kilometres, this is going to be the most densely populated area in Australia. There is no evidence that the traffic models have factored in this huge increase in density that will occur in the area.
h) According to the business case, Euston Road is supposed to handle 61,000 cars on 3 lanes each way. This is almost 10 times what it can handle on 2 lanes. There is no way it can handle 61,000 cars, however many lanes are added to it. 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 increase damage done to the area and cause rat-running.
i) 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.
j) 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.
k) 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 the Alexandria and Erskineville area to help residents cope with the massive rise in density that they are facing over the next ten years.
l) Westconnex is no solution to traffic congestion as the EIS shows that several intersections across the project route will remain at Level of Service F (the worst) after the project.

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Please publish this submission on the NSW Department of Planning and Environment website

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Box 39, Sydney NSW 2001

12856

Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5 :

I object to the project and the whole WestConnex because:

Westconnex has made no effort whatsoever to consult or hold meetings or information sessions with businesses and shops in the thriving Newtown, Enmore, Erskineville, Alexandria areas.

The EIS states (15-48) that *"King Street and Enmore Road business precinct contains numerous businesses, including retail, services, restaurants and cafes. The project does not propose to modify King Street, including speed limits or on-street parking arrangements along King Street. In future years, traffic modelling indicates that King Street is expected in most cases to experience reduced peak hour volumes under the 2021 'with project' scenario and 2031 cumulative scenario when compared to the without project scenario (refer to Technical Working Paper: Traffic and transport (Appendix G). The exception to this would occur in the 2031 cumulative case, where AM peak hour volumes southbound would increase by around 35 per cent when compared to the 'without project' scenario. However, this is in the opposing direction to the dominant AM peak hour and is within the design carrying capacity of the road. As there would not be any significant changes to traffic volumes or no modifications to King Street are proposed as part of this project, the project would not have a significant impact on businesses or amenity along King Street"*

i. These assertions are made with great certainty but are nothing more than a fabrication when the M4-M5 link – Haberfield to St Peters is only "*undergoing concept development and subject to planning approval*" and no details are included in the EIS.
ii. Westconnex has not issued the assumptions and the modelling parameters on which they are basing these statements, so their accurancy cannot be tested by independent experts.
iii. Each Stage of the project is being assessed separately, but the impact of each project is being considered in the context of the wider Westconnex program of works. No data has been provided as to what happens to King Street and surrounding areas in Stage 2 **IS** built and Stage 3 **NOT** built.
iv. No details whatsoever have been released about how the supposed 'Sydney Gateway' ("*undergoing concept development*") will alleviate traffic level concerns in King Street, Enmore Road, Edgeware Road, Euston Road, Mitchell Street, Maddox Street, and other local roads.

The EIS states (15-46) that *"parking along Euston Road would be provided during off-peak periods. However, by around 2031, the traffic performance demands along Euston Road may require all lanes to be available for traffic and off-peak parking may need to be removed.* ***The removal of carparking would be to the discretion of Roads and Maritime****".*

This confirms that the inevitable increase in traffic on already overcrowded local road networks can only be solved through the imposition of clearways by Roads and Maritime, decimating hundreds of businesses in King Street Newtown, Euston Road, Mitchell Road, Edgeware Road.

.....

Name: Toni McAllister Suburb: Erskineville Postcode: 2043.
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Please publish this submission on the NSW Department of Planning and Environment website

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12857

Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5 : Date 23-24 Jan 2016

I make this submission in response to the Westconnex M5 Environmental Impact Statement (EIS). I object to the project and the whole WestConnex because:

a) The suggestion that tunneling activities would need to be conducted 24 hours per day, seven days a week, including associated activities such as spoil handling and haulage is not justified, This will place great pressure on significant numbers of nearby residents throughout day and night-time periods.
b) Tunnelling would cause vibration and damage to homes. The EIS says it will only be for a short period but does not say what a short period is.
c) The EIS repeatedly says that threats to the liveable environment of residents during construction and operation would be subject to plans developed later. These plans should be available in the EIS.
d) AECOM's analysis of 'alternatives' provides no solid evidence. A combination of demand management of traffic and new public transport projects, especially for the western Sydney should have been explored.
e) Unfiltered ventilation stacks should not be used when safer filtered stacks are being used in other parts of the world. I am particularly concerned about residents on hills and in high buildings in Kingsgrove. St Peters, Arncliffe and Alexandria.
f) The flaws and optimistic assumptions in the traffic modelling mean that toll revenue is likely to be significantly lower than forecast. AECOM has a history of providing over-optimistic traffic forecasts for toll roads, resulting in previous financial failures (e.g., Clem7).
g) Tollways are not a solution. The average daily travel time in Sydney has been stable at about 80 minutes per person for decades, while the average trip distance has increased substantially. In this time, billions have been spent on tollways. Travellers are spending more than ever on tolls, yet are not spending any less time travelling.
h) The project will cause immense social harm. It will destroy long-established communities. It will cause an increase in air pollution-related deaths and illnesses. The increase in air pollution will further inhibit lung and nervous system development in children.
i) Tunnelling would expose residents to property damage and in some cases would occur only 20 metres below the house. This is not acceptable.
j) There are numerous ways of spending $17 billion that would deliver a much greater social and economic benefit, and would not cause so much destruction.
k) The social impact study is little more than a 'cut and paste' job and is insulting to communities where hundreds of tenants and owners have lost homes and others will live in decimated communities.
l) Usage of the M5 is not growing, and has not grown for some years. This project only makes an existing road more expensive for commuters. It will save little time, if any, and at an exorbitant price. As the EIS acknowledges, the tolls are going to force drivers off the M5 and onto local roads, and no wonder. The Updated Strategic Business Case shows that for almost all of its users, the Value of Time saved is less than the cost of using WestConnex.

Name: EMMa Jones Suburb: Erskineville Postcode: 2043
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Please publish this submission on the NSW Department of Planning and Environment website

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12858

Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5 : Date 23-24 Jan 2016

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- The EIS repeatedly says that threats to the liveable environment of residents during construction and operation would be subject to plans developed later. These plans should be available in the EIS.
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- Unfiltered ventilation stacks should not be used when safer filtered stacks are being used in other parts of the world. I am particularly concerned about residents on hills and in high buildings in Kingsgrove. St Peters, Arncliffe and Alexandria.
- The flaws and optimistic assumptions in the traffic modelling mean that toll revenue is likely to be significantly lower than forecast. AECOM has a history of providing over-optimistic traffic forecasts for toll roads, resulting in previous financial failures (e.g., Clem7).
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- The project will cause immense social harm. It will destroy long-established communities. It will cause an increase in air pollution-related deaths and illnesses. The increase in air pollution will further inhibit lung and nervous system development in children.
- Tunnelling would expose residents to property damage and in some cases would occur only 20 metres below the house. This is not acceptable.
- There are numerous ways of spending $17 billion that would deliver a much greater social and economic benefit, and would not cause so much destruction.
- The social impact study is little more than a 'cut and paste' job and is insulting to communities where hundreds of tenants and owners have lost homes and others will live in decimated communities.
- Usage of the M5 is not growing, and has not grown for some years. This project only makes an existing road more expensive for commuters. It will save little time, if any, and at an exorbitant price. As the EIS acknowledges, the tolls are going to force drivers off the M5 and onto local roads, and no wonder. The Updated Strategic Business Case shows that for almost all of its users, the Value of Time saved is less than the cost of using WestConnex.

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12859

Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5 : Date 23-24 Jan 2016

I make this submission in response to the Westconnex M5 Environmental Impact Statement (EIS). I object to the project and the whole WestConnex because:

i. The air quality study shows that some communities will be exposed to increased doses of dangerous pollution, especially those living close to surface roads.

ii. Westconnex will cause costly traffic chaos throughout the Inner West. It is unacceptable that no traffic modelling was done past two intersections after the end of the project.

iii. There is already flooding at St Peters when there are rain storms. Councils have already found that the flooding modelling is not acceptable for the M4 East and the same approach has been used for the M5.

iv. Experts have not been available at very limited EIS sessions. None were held in Newtown, Alexandria or Erskineville.

v. Residents are being forced out of homes at below market prices before approval has been given for the project.

vi. Most of the information about how Westconnex will deal with the negative impacts on residents, businesses and schools is pushed off to the post planning approval stage. This is unreasonable and leaves many in a state of great uncertainty.

vii. The roads around the St Peters interchange are already at an unacceptable Level of Service and are getting worse because of in-fill developments not allowed for by the EIS: Green Square: 61,000 residents. Ashmore: 6,000 residents. Waterloo Estate: 30,000 residents.Central 2 Eveleigh: 56,000 residents, 25,000 workers. With an extra 150,000 people in an area of a few square kilometres, this is going to be the most densely populated area in Australia. There is no evidence that the traffic models have factored in this huge increase in density that will occur in the area.

viii. According to the business case, Euston Road is supposed to handle 61,000 cars on 3 lanes each way. This is almost 10 times what it can handle on 2 lanes. There is no way it can handle 61,000 cars, however many lanes are added to it. 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 increase damage done to the area and cause rat-running.

ix. 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.

x. 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.

xi. 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 the Alexandria and Erskineville area to help residents cope with the massive rise in density that they are facing over the next ten years.

xii. Westconnex is no solution to traffic congestion as the EIS shows that several intersections across the project route will remain at Level of Service F (the worst) after the project.

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12860

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Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5 : Date 23-24 Jan 2016

I make this submission in response to the Westconnex M5 Environmental Impact Statement (EIS). I object to the project and the whole WestConnex because:

1) There is no independent assessment of traffic modelling. The Sydney Motorway Corporation claims its model has been peer reviewed but refuses to publish the review or the assumptions on which it is based; independent traffic planners cannot test its results.
2) Westconnex will not release its full assumptions on which it is based so that Councils and independent experts can test its predictions.
3) The cost of Westconnex is escalating at a rate of $2 billion a year
4) There has been no genuine consultation with the community.
5) The New M5 will dump over 100,000 cars and trucks,many of which will end up on local streets into Newtown, Erskineville, Alexandria and Enmore. This is not by accident – it is intentional.
6) I strongly object to the quality of the EIS. There is too little information on the traffic volumes that will occur in Alexandria, and there is also conflicting information on possible mitigation strategies. Although the diagrams in the EIS show right-hand turn lanes in all four directions at the Sydney Park Road/Euston Road intersection, the text of "New M5 EIS Vol 2B App G Traffic and Transport" instead indicates that there will be a "banned right turn from Mitchell Road into Sydney Park Road [because of] the banned right turn southbound at the Sydney Park Road / Euston Road intersection". The text also indicates that there will be a "north-bound lane [which] will go as far as Maddox Street, where it becomes a new left-hand turn lane", but the diagrams do not show this. Not having clarity on which of these two scenarios is planned makes informed consultation impossible. If these right-hand turns into Sydney Park Road are not permitted, there will be enormous volumes of traffic on local roads as drivers try to rat run. Likewise, the extra left-hand turn lane, if it is actually planned, seems destined to drive traffic onto local roads.
7) Westconnex has failed to consult with businesses in King St Newtown and other parts of the Inner West. These businesses are part of a thriving economy and street life that would be destroyed by increased traffic and imposition of inevitable clearways.
8) No details have been released on the route of the M4/M5 and how it will affect suburbs - e.g there is no information about where mid point tunnelling would take place, nor where smoke stacks will be required for the tunnels between St Peters and Camperdown.
9) Westconnex has consistently underestimated the traffic that will be induced but its tollway projects; when these projects failed Sydney will be left with traffic pollution
10) Thousands of diesel trucks will carry spoil at all times, including peak times, leading to great disruption of local and regional road networks.
11) Westconnex will not release its full assumptions on which it is based so that Councils and independent experts can test its predictions.
12) It is not clear whether massive proposed increases in population in the Inner Sydney have been taken into account in traffic congestion predictions
13) No noise modelling has been done for how residents living above two stories will be affected
14) Billions of dollars of construction contracts have been let before this EIS was lodged.

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Secretary
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Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5 : Date 23-24 Jan 2016

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b) Westconnex will cause costly traffic chaos throughout the Inner West. It is unacceptable that no traffic modelling was done past two intersections after the end of the project.
c) There is already flooding at St Peters when there are rain storms. Councils have already found that the flooding modelling is not acceptable for the M4 East and the same approach has been used for the M5.
d) Experts have not been available at very limited EIS sessions. None were held in Newtown, Alexandria or Erskineville.
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l) Westconnex is no solution to traffic congestion as the EIS shows that several intersections across the project route will remain at Level of Service F (the worst) after the project.

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12862

Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5 : Date 23-24 Jan 2016

I make this submission in response to the Westconnex M5 Environmental Impact Statement (EIS). I object to the project and the whole WestConnex because:

- The whole Westconnex system of tollways will worsen traffic congestion in Inner Sydney. Western Sydney will be left with inadequate public transport and expensive tolls.
- The cost of Westconnex is escalating at a rate of $2 billion a year & has already reached $17 billion.
- There has been no genuine consultation with the community. The consultation period for the 8000 page EIS has taken place over the summer holidays. There has been no exhibition in Alexandria, Newtown, Erskineville or Enmore.
- In the public interest, there should be an independent EIS. AECOM, the company paid $13 to do the EIS works alongside Westconnex and has multiple contracts in the project design and construction.
- Traffic on Euston Road would increase by 12 times with the project. In morning peak, 11 major intersections in Alexandria & St Peters would be the same or worse after the New M5 is built in 2021, & in 2031, even assuming the entire Westconnex system is built. The same would occur in Kingsgrove.
- In fact the situation will be even worse as independent transport experts say that Westconnex has consistently underestimated the traffic that will be induced by its tollways.
- Westconnex acknowledges that local roads in Alexandria & Erskineville won't have the capacity to deal with traffic by 2021.
- The EIS provides no solid evidence for its rejection of alternatives including a combination of better traffic management and public transport.
- Westconnex will destroy hundreds of paperbark trees in Euston Road, which will be turned into a major highway carrying 12 times as much traffic a day as currently, passing within two metres of residents' homes. This is completely unacceptable.
- People living within 500 metres of a major roads have an increased risk of lung and heart disease. Residents around the planned St Peters Interchange and exits at Kingsgrove/Beverly Hills are already exposed to occasional levels of air pollution that exceed national guidelines. These levels can only worsen in these and other congested areas. There has been no local roadside monitoring.
- Thousands of residents will be affected by noise at levels, which can impact on health. There are no firm proposals for mitigation. No noise modelling has been done for residents living above 2 stories.
- This project will permanently destroy 11,000 square metres of Sydney Park, turn large parts of it into construction compounds for years, and expose the rest of the park to vehicle fumes and noise. This area already has one of the lowest amounts of public open space per person in Australia, and to destroy so much of for a toll road is unacceptable.
- The AECOM EIS team didn't consult with businesses in King St Newtown, Erskineville, St Peters and other parts of the Inner West. These businesses are part of a thriving economy that would be destroyed by increased traffic.
- Thousands of diesel trucks will carry spoil 24 hours a day, including peak times, leading to great disruption of local and regional road networks.
- Hundreds of tenants and homeowners have been forced out of their homes before the EIS was even lodged. Heritage buildings are being destroyed and St Peters decimated.
- It is likely a rare endangered colony of Green and Golden Bells frogs at Arncliffe will be destroyed.

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12863

Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5 : Date 23-24 Jan 2016

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- It is likely a rare endangered colony of Green and Golden Bells frogs at Arncliffe will be destroyed.

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Box 39, Sydney NSW 2001

12864

Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5 : Date 23-24 Jan 2016

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c. The cost of Westconnex is escalating at a rate of $2 billion a year
d. There has been no genuine consultation with the community.
e. The New M5 will dump over 100,000 cars and trucks,many of which will end up on local streets into Newtown, Erskineville, Alexandria and Enmore. This is not by accident – it is intentional.
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l. It is not clear whether massive proposed increases in population in the Inner Sydney have been taken into account in traffic congestion predictions
m. No noise modelling has been done for how residents living above two stories will be affected
n. Billions of dollars of construction contracts have been let before this EIS was lodged.

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Please publish this submission on the NSW Department of Planning and Environment website



Submission to Department of Planning & Environment
WestConnex – New M5
Environmental Impact Statement
November 2015
Application Number SSI 14_6788

Introduction

The National Roads & Motorists' Association (NRMA) comprises more than 2.4 million Members across New South Wales (NSW) and the Australian Capital Territory (ACT). For more than 90 years, NRMA has represented the interests of motorists in relation to traffic management and road safety.

NRMA welcomes the opportunity to provide this submission to the NSW Department of Planning and Environment in response to the WestConnex New M5 Environmental Impact Statement (EIS).

NRMA strongly supports completing the missing links in Sydney's motorways to create a connected and functional motorway network. We support WestConnex and our intention with this submission is to make it an even better project.

The New M5 will be a major addition to this network, and when joined with the proposed WestConnex Stages 1 and 3, will provide a continuous motorway link between the M4 and M5 motorways. By improving travel times and travel time reliability, it can make a positive difference to the way people move around the motorway network.

NRMA's key concern highlighted in our submission to the M4 East project was how the proposed three lane tunnel would be at capacity not long after the full WestConnex project is proposed to open to traffic. In contrast, the section of the New M5 between Arncliffe and St Peters has been designed to cater for five lanes in each direction (initially to be marked as two lanes in each direction) to cater for future growth and connections.

The main focus of this submission is on addressing the predicted significant traffic diversion to roads surrounding the M5 East, since these impacts do not appear to have been adequately addressed by the EIS.

Comments and Queries

NRMA has outlined in this submission a number of key recommendations for consideration by the NSW Department of Planning & Environment and by the Proponent. We would welcome the opportunity to discuss this submission with the Proponent and with the Department to assist the Department in undertaking its assessment.

Comments and queries on this document may be directed to:
Government Relations & Public Policy
National Roads & Motorists Association
[redacted] Strathfield NSW 2135
[redacted]
[redacted]

Making WestConnex work for road users and the surrounding communities

The fundamental issues for WestConnex are how well it will work for traffic and how well it will be perceived by road users and the wider community.

The EIS for the New M5 indicates the New M5 and the associated new toll on the M5 East will lead to a large reduction in traffic using the M5 East (a 40% reduction from 116,000 vehicles per day to 69,000 vpd in 2021). This will make a very positive difference to the operation of the M5 East.

Unfortunately, this positive benefit is offset by the large increase in traffic diverting to surface streets (a 35% increase in traffic on Stoney Creek Road through Bexley).

This will significantly increase congestion on the designated detour route for the M5 East (Marsh and Wickham Streets and Forest and Stoney Creek Roads) and will inevitably lead to traffic intrusion into local streets, and restricting freedom of travel and resulting in other impacts for the adjacent communities.

Some level of toll avoidance is to be expected, however, the very high level of traffic diversion to surface streets is a strong indication that the New M5 does not serve many trips currently taken via the M5 East, and that many motorists will not perceive the proposed tolls on the New M5 and the new toll on the M5 East as representing value for money.

For those motorists who need to continue to travel in the M5 East corridor, the options will be to either pay a new toll to use the M5 East, or to divert to the surrounding streets. This is presumably the reason for the significant increase in congestion the EIS predicts on the parallel surface streets.

Importantly the significant increase in traffic and travel times on parallel surface streets to the M5 East means the traffic and community implications for this section of WestConnex are very different to those affecting both the M4 widening and the M4 East projects. In contrast to the predicted 35% increase on roads such as Stoney Creek Road as a result of the New M5 and the new toll on the M5 East, the predicted traffic volume changes on the majority of Parramatta Road as a result of the M4 East are relatively small.

This indicates a need to adopt a different approach with the New M5 to that taken for the previous WestConnex projects.

One of the five ‘core’ project objectives identified in the EIS Appendix G, Section 2.1 is to “Relieve road congestion so as to improve the speed, reliability and safety of travel in the M5 Motorway corridor, including parallel arterial roads”.

The EIS predictions that large volumes of traffic will divert to arterial roads through Bexley and Arncliffe, inevitably also leading to traffic intrusion into local streets is a strong indication that the current project sill not satisfy this ‘core’ project objective.

Given the propensity to overestimate traffic volumes on recent Australian till roads, it is feasible the EIS may actually under-estimate the level of toll diversion.

The high level of traffic predicted to divert to the surrounding streets is a significant concern and the EIS appears to offer little in the way of solutions to address the associated congestion, road safety, noise and air quality issues that will affect the users of these roads, and the adjacent communities.

In stark contrast, however, to the predicted impacts on the surface routes, the EIS predicts the performance of the existing M5 East (in terms of speed, journey reliability, road safety and air quality) will significantly improve.

The EIS states that "a network and corridor optimisation approach" will be adopted "to manage delay and queuing impacts at critical intersections" on the surrounding network.

Realistically, the predicted congestion is not something that may be resolved by 'tweaking' traffic light operations or installing 'Local Area Traffic Management' measures, such as speed humps, in local streets. Although not identified in the EIS because of the restricted geographical scope of the project study area, intersections such as Forest Road / Stoney Creek Road / Bexley Road / Harrow Road on the M5 East detour route already fail and operate at Level of Service 'F'.

It is hard to contemplate, or to convey, what adding 35% additional traffic actually means in terms of delays and queue lengths to intersections that are already operating at Level of Service 'F'.

One way perhaps to try to comprehend what this large increase in traffic will mean for congestion is to consider the opposite effect of how much lighter traffic becomes as a result of a 5 – 10% reduction in traffic during school holidays (depending on the holiday).

It is difficult to understand how intersections operating at Level of Service 'F' can be optimised any further without adding major and costly works to the project scope, such as increasing the number of lanes, grade separating the traffic movements via under or overpasses, removing all parking, or bypassing congestion hot spots such as Bexley, altogether.

The EIS response is simply that an "*operational traffic review* would be conducted 12 months following commencement of operation *to confirm the operational traffic impacts of the project on surrounding roads and major intersections*" (New M5 EIS Volume 1B, Section 9, Traffic & Transport, Page 9-150).

In the absence of any tangible measures identified in the EIS to manage this increase, and in order to mitigate the adverse impacts, there appears to be a pressing need to reconsider the proposed toll prices for cars and trucks. Reducing the proposed toll levels so as to encourage motorists to not divert to surface streets has the most potential to encourage motorists to instead use the M5 East and the New M5.

Summary of Recommendations

We have outlined in this submission a number of key recommendations for consideration by the Department of Planning and Environment, and by Roads & Maritime Services as the Proponent. We would welcome the opportunity to discuss this submission with the Department and to respond to any queries the Department may have.

We are pleased that many of the recommendations in NRMA's 'WestConnex: Getting it Right' report appear to now have been embraced by the WestConnex project, such as improved tunnel lighting to reduce fatigue, improve safety and add interest to the tunnel journey, and avoiding steep uphill and downhill grades. A copy of this report is included in 'Appendix A' to this submission.

The NRMA report also highlighted the need to ensure that WestConnex represents value for money for motorists. It identified the main overriding objective for the WestConnex project as being long term effective traffic management, not lowest cost or revenue maximisation. The preceding section of this submission and the following recommendations are focused on achieving this objective.

We are pleased the New M5 has been designed to cater for five lanes in each direction (initially marked as two lanes in each direction) between Arncliffe and St Peters, presumably to provide for future growth and new connections.

This contrasts with one of the key concerns highlighted in NRMA's submission to the WestConnex M4 East EIS, specifically how the proposed three lane M4 East tunnel would be at capacity not long after the full WestConnex project opens to traffic.



Example of existing traffic congestion on the southbound exit from the two lane M5East main tunnel at Bexley North in the PM peak.

The main issue highlighted in this new submission to the WestConnex New M5 is the significant traffic diversion to surface streets around the M5 East, primarily as a result of the new toll proposed for the M5 East. It seems that this will have the opposite effect to that envisaged in NRMA's 'WestConnex: Getting it Right' report that envisaged opportunities to revitalise roads such as Forest and Stoney Creek Roads through Bexley.

A summary of NRMA's further recommendations are provided below. This is followed by more detailed information in relation to each recommendation.

Recommendation 1
The Proponent shall provide a critical analysis of traffic predictions versus actual traffic volumes on previous Australian motorway projects opened over the last 10 years, and an explanation of how this has been taken into account in predicting traffic volumes for the WestConnex M4 East project.

Recommendation 2
The Proponent shall present the results of stress testing the project design and tolling assumptions against high, medium and low traffic projections

Recommendation 3
The Proponent shall provide details of the toll sensitivity testing that was used to inform the toll choice modelling, the survey outcomes of drivers' willingness to pay tolls, and details of how this affected the model results

Recommendation 4
The Proponent shall confirm whether the traffic modelling for 2031 assumed there would no longer be 'Cashback' for private motorists using the M5 West motorway.

Recommendation 5
The Proponent shall reconsider the proposed tolls and the level of toll escalation on the M5 East and New M5 with the aim of significantly reducing the predicted traffic increase and associated impacts on surface roads, particularly around Bexley and Arncliffe.

Recommendation 6
The Proponent shall establish an independent toll agency with the ability to decrease or increase tolls for the New M5 and M5 East within a cap to encourage efficient operation and the best use of the project by motorists, and to oversee rebates to motorists for poor motorway performance

Recommendation 7
The proponent shall instigate measures to encourage trucks to utilise the M5 East and the New M5 in order to minimise diversion to the surface streets and to reduce the impacts on the surrounding road network and adjacent communities.

Recommendation 8
The Proponent shall integrate 'park and ride' into the project scope, potentially similar to the underground 'Domain' carpark so as to enable the surface to be used by the local community. This would enable consideration of a future fast, direct public transport link from the end of the New M5 at St Peters into Sydney airport.

Recommendation 9
The Proponent should provide noise attenuation measures for residences in proximity to roads such as Marsh and Wickham Streets, and Forest and Stoney Creek Roads, in order to offset the increase in noise associated with the increase in traffic predicted to use these roads, both during construction and operation of the project.

Recommendation 10
The Proponent shall expand the detailed study area and reporting in the Traffic & Transport Assessment to include the Forest Road / Stoney Creek Road and Canterbury Road corridors to enable a proper assessment of the congestion and road safety impacts and opportunities associated with these corridors and the surrounding road network.

Recommendation 11
The Proponent shall ensure that breakdown lane widths outside the tunnel are 3 metres wide in order to safely accommodate broken down vehicles and their occupants, and to provide adequate separation from live traffic for emergency and maintenance workers, and incident responders.

Recommendation 12
The Proponent shall investigate options for grade separation of traffic lanes, along with measures to remove right hand on and off ramps in order to improve traffic flow and road safety between King Georges Road and Bexley Road

Recommendation 13
The Proponent shall ensure all features of a managed (smart) motorway are included within the project scope and are operational on opening of the Project

Recommendation 14
No advertising shall be permitted within the WestConnex / M5 East lease area both during construction and operation

Recommendation 15
The Proponent shall ensure the New M5 is designed and operated to minimise both the number of times and the duration it is closed for maintenance

Recommendation 16
The scope for the New M5, including the city-bound approach to the existing M5 East tunnel should incorporate the world's best systems and designs to stop over-height vehicles, and vehicles carrying dangerous goods from attempting to enter the tunnels.

Recommendation 17
The Proponent shall consult with road user groups such as NRMA in regards to the detailed tunnel design features

Recommendation 18
The Proponent shall publish the operational requirements for the motorway in regards to identifying, responding to and clearing incidents, such as crashes and breakdowns.

Recommendation 19
The Proponent shall publish detailed information each month in regards to the performance of the motorway. This must include details of traffic volumes both on the mainline motorway and by ramp, incident data including numbers of crashes and breakdowns, the duration of these incidents and the response times for dealing with these incidents.

Recommendation 20
The Proponent shall ensure the capacity of the M5 East and New M5 detour routes are not reduced.

Recommendation 21
The Proponent shall ensure the lane widths on detour routes are sufficiently wide to safely cater for large trucks, including petrol tankers that are not permitted in the tunnels, so as to minimise the potential for conflict with other vehicles and vulnerable road users, such as cyclists and pedestrians.

Recommendation 22
The Proponent shall install a continuous line of profiled line marking [raised markings] as an edge line outside the tunnels to delineate the traffic lanes from the road shoulder and provide both a visual and audible alert to any motorist deviating from the carriageway. This will improve safety for anyone using the road shoulder, such as broken down vehicles, or maintenance workers, and will improve delineation, particularly at night and in wet weather.

The following recommendations specifically relate to the <u>Construction Phase</u> of the project

The EIS states the project would generate 2.7 million cubic metres of spoil, all of which will be moved by truck. This is 300,000 cubic metres more than the M4 East's 2.4 million cubic metres of spoil. The cumulative impacts on traffic and road safety during the multiple construction phases of the WestConnex and NorthConnex projects have not been assessed.

Recommendation 23
The Proponent shall prohibit all spoil truck movements associated with the Project to outside the AM and PM weekday, and weekend road traffic peaks

Recommendation 24
The Proponent shall apply additional safety features to improve road safety associated with the operation of trucks on the project. Examples of appropriate safety features could include front / side / rear under-run protection and speed control

Recommendation 25
The Proponent shall reassess the proposed spoil routes for the project

Recommendation 26
The Proponent shall ensure that the Construction Traffic Management Plan restricts the use of compression braking by spoil trucks, particularly on steep sections of roads such as Bexley Road between Forest Road and Kingsland Road South

Recommendation 26
The Proponent shall ensure that the project Construction Traffic Management Plan requires all spoil trucks associated with the Bexley North south construction area to use the kerbside lane when travelling on Bexley Road westbound between Barnsbury Grove and Shaw Street.

Recommendation 27
The Proponent shall extend the crash guardrail adjacent to the kerbside westbound lane at the Bexley North railway overpass further towards the intersection with Shaw Street and install crash protection for pedestrians on the footpath between the bus stop to the east of this location and the intersection with Shaw Street

The Proponent shall also provide crash protection for pedestrians on the footpath adjacent to the kerbside westbound lane of Bexley Road approaching Shaw Street.

Further information relating to NRMA's recommendations

Recommendation 1

The Proponent shall provide a critical analysis of traffic predictions versus actual traffic volumes on previous Australian motorway projects opened over the last 10 years, and an explanation of how this has been taken into account in predicting traffic volumes for the WestConnex M4 East project.

Robust traffic projections are a critical input to WestConnex, not just in terms of predicting the amount that will be collected from motorists in tolls, but in terms of design issues such as the numbers of traffic lanes on the motorway and on the entry and exit ramps, and in terms of the changes that may be feasible on surface roads, such as new bus and bicycle lanes.

One of the challenges for WestConnex is to demonstrate to the public the steps that have been taken to address the accuracy of traffic modelling. This is particularly important given that recent Australian toll road projects appear to have consistently over-predicted the amount of traffic that will use these projects. If this tendency to overestimate occurs on the New M5 then the high level of traffic diversion to the surrounding streets predicted in the EIS may actually be much worse.

The EIS contains a significant amount of information in relation to traffic modelling, however, the analysis does not appear to include an evaluation of modelling undertaken for previous toll road projects, the lessons learnt and an explanation of how the WestConnex modelling has addressed these issues.

Recommendation 2

The Proponent shall present the results of stress testing the project design and tolling assumptions against high, medium and low traffic projections

As demonstrated by recent toll road projects, traffic modelling is far from an exact science. The strategic model used for WestConnex assists in undertaking a metropolitan level analysis and modelling broad network changes, but in spite of the limitations of strategic modelling, the EIS presents the results as if they are absolute traffic figures.

We believe it would also be useful to present the traffic modelling in terms of high, medium and low projections and to report the results of sanity checking, or stress testing the project design and tolling assumptions against each of these scenarios.

Recommendation 3

The Proponent shall provide details of the toll sensitivity testing that was used to inform the toll choice modelling, the survey outcomes of drivers' willingness to pay tolls, and details of how this affected the model results

The EIS contains very limited information in regard to tolling or project financing. This makes it difficult to objectively assess whether the proposed tolls for traffic using WestConnex are appropriate and whether the predicted traffic volumes will be achieved.

We would like to see details of the toll sensitivities used to determine the proposed toll levels and traffic projections. The EIS indicates the toll choice model was adjusted to match observed patronage on existing toll roads, but does not report on this, or provide an analysis of the sensitivity of road users to paying multiple tolls whilst travelling from one toll road to another, for example, from the M7 to the M5 and then onto WestConnex.

Toll levels can have a major effect on the distribution of traffic using the toll road compared to traffic using alternative routes. As shown by recent Australian toll road projects, road users are very sensitive to different toll levels. The high level of predicted toll diversion from the New M5 and from the M5 East to the surrounding surface streets appears to reinforce this concern.

It would be useful for information to be provided on the toll sensitivity testing in relation to the proposed truck toll at three times the car multiplier, including the outcomes of consultation both the large road haulage companies and also with single vehicle owner / operators of vehicles who will be required to pay the truck toll.

Recommendation 4

The Proponent shall confirm whether the traffic modelling for 2031 assumed there would no longer be 'Cashback' for private motorists using the M5 West motorway.

Users of the M5 West / M5 East and the M5 West / WestConnex New M5 corridors will pay separate tolls to travel on each of these roads, since unlike the M4 / WestConnex M4 East corridor, the proposed WestConnex toll cap is not integrated with the M5 West. Whilst private users of the M5 West will continue to have the option of claiming cashback on the M5 West until the current concession ends in December 2026, there is currently no commitment to retain cashback after this date and it is unclear what has been factored into the traffic modelling in the New M5 EIS.

Recommendation 5

The Proponent shall reconsider the proposed tolls and level of toll escalation on the M5 East and New M5 with the aim of significantly reducing the predicted traffic increase and associated impacts on surface roads, particularly around Bexley and Arncliffe.

One of the five core project objectives identified in the EIS Appendix G, Section 2.1 is to "Relieve road congestion so as to improve the speed, reliability and safety of travel in the M5 Motorway corridor, including parallel arterial roads".

The project in its current form does not appear to have achieved this core objective, as evidenced by the large increase in traffic diverting to arterial roads through Bexley and Arncliffe, also leading to traffic intrusion to local roads.

Furthermore, indications that WestConnex toll prices will be permitted to increase at greater than the rate of inflation are likely to compound the diversion to surrounding streets.

Recommendation 6

The Proponent shall establish an independent toll agency with the ability to decrease or increase tolls for the New M5 and M5 East within a cap to encourage efficient operation and the best use of the project by motorists and to oversee rebates to motorists for poor motorway performance

NRMA's recent report 'Keeping Sydney Moving, delivering Better Road & Motorway performance, May 2015 recommends a new approach to setting road tolls, focusing on the whole road network performance;

It recommends that IPART or a similar authority should oversee negotiations for new tollway contracts or any extension of toll way concessions – this includes reinvesting surplus profits above and beyond the contract for the benefit of commuters.

Further information in regards to this recommendation may be viewed here:

See NRMA report 'Keeping Sydney Moving, Delivering Better Road & Motorway Performance' May 2015:
http://www.mynrma.com.au/images/About-Education/Keeping_Sydney_Moving.pdf

See NRMA calls for toll rebates for congestion:
http://www.mynrma.com.au/get-involved/advocacy/news/nrma-calls-for-toll-rebates-for-congestion.htm

Recommendation 7

The Proponent shall instigate measures to encourage trucks to utilise the M5 East and New M5 in order to minimise diversion to the surface streets and to reduce the impacts on the surrounding road network and adjacent communities.

The high level of traffic diversion from the existing M5 East is an indication the proposed truck multiplier at three times the car toll may be too high to encourage owner operators of trucks hauling containers to and from Port Botany.

Consideration should be given to reducing tolls during off-peak periods to encourage trucks use the project, helping to reduce the impact on residents and surrounding businesses, such as through Bexley, when trucks divert to the surrounding streets.

Consideration should also be given to potential measures such as those employed on the NorthConnex project that require trucks to use NorthConnex as opposed to Pennant Hills Road.

Recommendation 8

The Proponent shall integrate 'park and ride' into the project scope, potentially similar to the 'Domain' underground carpark so as to enable the surface to be used by the local community. This would enable consideration of a future fast, direct public transport link from the end of the New M5 at St Peters into Sydney airport.

Traffic delays associated with travel to and from Sydney airport are a regular occurrence that impact on Marsh Street and the M5 East. They are not just limited to the 'traditional' AM and PM weekday peaks, but also include Saturday and Sunday mornings, in particular.

Over the recent Christmas / New Year and Australia Day holidays, the NSW Transport Management Centre advised that the M5 East eastbound off-ramp to Marsh Street would be closed when traffic conditions are particularly heavy.

The New M5 EIS does not currently resolve these issues, however, there are indications that WestConnex may be extended in the future into the airport, although it is unclear what this would mean for traffic congestion within the airport precinct.

Including a park and ride site within the project scope to integrate with a future public transport link would provide additional travel options, potentially introducing new opportunities to provide a public transport link to the south, possibly via West Botany Street, and connections through to the Inner West or South East Light Rail projects.

Recommendation 9

The Proponent should provide noise attenuation measures for residences in proximity to roads such as Marsh and Wickham Streets, and Forest and Stoney Creek Roads, in order to offset the increase in noise associated with the increase in traffic predicted to use these roads, both during construction and operation of the project.

Residents along these routes are already subject to high traffic noise for sustained periods and whenever the M5 East is closed, particularly at night. These noise impacts will be increased during the construction and operational phases of the project.

According to the RMS website a noise assessment is not mandatory but instead only recommended for development alongside Stoney Creek Road between King Georges Road and Kingsgrove Road, and is not required at all on Stoney Creek Road between Kingsgrove Road and Forest Road at Bexley.

A noise assessment is not mandatory but instead is recommended for development between Stoney Creek Road and the Princes Highway and on Wickham Street between Princes Highway / Forest Road and West Botany Street.

Source: http://www.rms.nsw.gov.au/documents/about/environment/noise-reduction/traffic-volume-maps-sepp/traffic-volume-maps-map-15.pdf

Recommendation 10

The Proponent shall expand the detailed study area and reporting in the Traffic & Transport Assessment to include the Forest Road / Stoney Creek Road and Canterbury Road corridors to enable a proper assessment of the congestion and road safety impacts and opportunities associated with these corridors and the surrounding road network.

The study area identified within the Traffic & Transport report is very limited in its size.

The study area for the Traffic and Transport assessment is predominantly focused on the existing M5 Motorway corridor and on the surface road network around the St Peters interchange as shown in appendix G to the EIS, Figure 3.

This appears to be why the impacts on road safety and intersection performance on roads such as Forest and Stoney Creek Roads through Arncliffe and Bexley, Bexley and Harrow Roads and on

Canterbury Road, and opportunities to improve cycle and pedestrian amenity through these areas have largely been ignored by the EIS.

It is critically important to expand the study area to include in particular the Forest / Stoney Creek Road corridor due to the large congestion impacts and since this is the detour route designated by Roads & Maritime services for use whenever there is an incident in the M5 East. It is also the designated route for dangerous goods vehicles such as petrol tankers, and for over height vehicles that are not permitted in the M5 East and New M5 tunnels.

Recommendation 11

The Proponent shall ensure that breakdown lane widths outside the tunnel are 3 metres wide in order to safely accommodate broken down vehicles and their occupants, and to provide adequate separation from live traffic for emergency and maintenance workers, and incident responders.

The EIS states the existing M5 East motorway shoulders will be narrowed to accommodate the changed lane configuration but does not provide any assessment of the impact this will have on road safety.

The NSW Government's Breakdown Safety Strategy (September 2012) was developed in response to a fatality on the Hume Highway near Mittagong where it was found the breakdown lane was too narrow to accommodate a broken down vehicle.

Action Item 4 from the Strategy states RMS will continue to install 3m wide shoulders on high speed roads, wherever possible.

Recommendation 12

The Proponent shall investigate options for grade separation of traffic lanes along with measures to remove right hand on and off ramps in order to improve traffic flow and road safety between King Georges Road and Bexley Road

The New M5 EIS contains very limited information on how the motorway section between King Georges Road and Bexley Road is intended to operate as a result of the project.

There are existing issues that currently contribute to the poor performance of this section and whilst the New M5 proposes additional lanes, it does not resolve the friction and associated congestion and road safety issues associated with the high level of merging and weaving through this section.

NRMA's 'WestConnex Getting it Right' report (See Appendix 'A' to this submission) highlighted the traffic flow and road safety issues associated with left to right merges and with right hand on and off-ramps.

The existing city-bound weave between King Georges Road and Bexley Road, and the right hand off-ramp to Bexley Road (and to Kingsgrove Road in the out-bound direction) contributes to traffic congestion and road safety issues. This traffic will now have to also weave across traffic heading for the New M5. The project does provide additional lane capacity through this area but does not resolve the merging / weaving issues.

For traffic entering at King Georges Road and departing at Bexley Road, the weave will seemingly be significantly more difficult as a result of the project due to the need to weave across additional traffic lanes.

Having said this, the high level of toll diversion away from the M5 East will presumably reduce the amount of traffic needing to make this weave. Conversely, however, it will increase traffic travelling through local areas on streets such as Stoney Creek Road / Forest Road, Moorefields Road, Vanessa Street / Kingsgrove Avenue, Morgan Street / Kingsgrove Road / Shaw Street, increasing the congestion and road safety issues on these roads

Making the New M5 / M5 East merges and weaves work safely and efficiently is preferable to pushing traffic onto adjacent roads. The EIS contains no proposals, to grade separate some of these traffic movements, either via underpasses or overpasses.

Instead the project will extend the available queuing area by increasing the number of lanes between King Georges Road and the tunnel entry and exit points. Unfortunately this will not resolve these design issues that in the long term, as now, will impact on congestion and road safety.

We note that the EIS for the WestConnex King Georges Road interchange contained minimal information in relation to upstream and downstream traffic movements or traffic volumes. This made it impossible to determine how the interchange would function in relation to the new and existing M5 East, and for NRMA to provide objective comments. Accordingly this is the first opportunity for NRMA to query what has been proposed for this section.

The New M5 EIS indicates the project will do nothing to improve the current poor performance of the King Georges Road interchange, revealing the interchange fails (Level of Service F) both with and without the project (Volume 1B, section 9 Traffic & Transport, Page 9-129).

Including instead within the New M5 project scope the grade separation of some of the traffic movements in this area may be the best way to resolve at least some of these issues. A similar change was made to the eastern end of the Cross City Tunnel in a Supplementary EIS by shifting surface traffic destined for Neild Avenue from Bayswater Road to a new ramp from Ward Avenue (albeit that there was insufficient room in this instance to remove the right to left merge at the bottom of the ramp).

Realistically, removing some of this traffic by commencing the New M5 to the south of the King Georges Road interchange may have been the best, albeit more costly option.

For some reason the EIS states that proposed works planned by Roads & Maritime Services to be undertaken separate to the WestConnex project for the intersections of King Georges Road with Stoney Creek Road and with Broadarrow Road (separate to the WestConnex project) “would likely contribute to improved performance of the King Georges Road Interchange”.

It does not, however, provide any justification for this statement and with Stoney Creek Road being 1.5km away from the King Georges Road interchange, it is difficult to understand how this will improve the operation of the King Georges Road interchange.

Recommendation 13

The Proponent shall ensure all features of a managed (smart) motorway are included within the project scope and are operational on opening of the Project

Actively managing the New M5 will be critical to keeping traffic moving. The EIS indicates many of the features of a smart or managed motorway will be provided as part of the project, such as widened on-ramps "to support the future implementation of a smart motorway solution" (EIS Volume 1A, Section 5.8.7).

However, it does not provide confirmation that the full system will be implemented as part of the project and will have the ability to be operational when the project opens to traffic.

NRMA was disappointed that neither the recent M2 or M5 widening upgrade projects incorporated smart motorway features to help keep traffic moving into the future and to manage the motorways as a network, rather than as isolated links. We are pleased the New M5 will provide many of the features required to actively manage traffic on the motorway, but are concerned the New M5 EIS, just like the M4 East, does not commit to funding the full implementation of smart motorway operations and ensuring the motorway is able to be actively managed on opening.

Additionally, we continue to raise concerns that the motorway management system being developed by RMS may not perform as well as the tried and tested system used on Victoria.

The M4 Smart Motorway EIS identified travel time improvements of up to 25 per cent in peak period travel times as a result of implementing the smart motorway management system. It did not, however, provide any detailed analysis to show how this will be achieved by the M4 Smart Motorway management system, the impact on traffic waiting to access the motorway, or any analysis on whether adopting the system used in Victoria and being rolled out in Queensland, would produce better results for motorists. NRMA supports WestConnex having an active managed motorway system and continues to recommend that Transport for NSW commissions an independent assessment to seek the best system for road users and NSW taxpayers.

Recommendation 14

No advertising shall be permitted within the WestConnex lease area both during construction and operation

On previous toll road projects such as the Cross City and Lane Cove Tunnels, advertising signs were specifically prohibited as part of the conditions of approval for these projects.

NRMA considers that permitting advertising signs and structures would introduce an unnecessary road safety issue. NRMA's 'WestConnex: Getting it Right' report highlighted the importance of minimising the number of crashes and distractions on the motorway in order to keep traffic moving, improve safety and minimise the number of times that traffic diverts to surrounding streets.

The dangers of distraction are highlighted on the NSW Centre for Road Safety website, as follows:

“Driving is a complex task. Anything that takes your mind or eyes off the road, or your hands off the wheel, not only compromises your safety, but that of everyone else on the road.

Being distracted increases your chances of having a crash. It slows down your reaction times and puts you in danger of failing to see hazards such as traffic lights, stop signs or other road users, including pedestrians and cyclists.”

Given these dangers and the increasing use of electronic billboards to attract the attention of road users, we believe there should be a specific planning condition prohibiting advertising signs and structures within the New M5 and M5 East corridors.

Recommendation 15

The Proponent shall ensure the New M5 is designed and operated to minimise both the number of times and the duration it is closed for maintenance

NRMA’s ‘Decongestion Strategy – 10 Ways to Relieve Sydney’s Traffic Headache’ revealed that the M5 East motorway was closed 72 times for planned maintenance and 45 times for unscheduled maintenance between July 2009 and July 2010. During these closures traffic is redirected to surrounding streets,

The M5 East EIS does not contain any details on the numbers of times the road will be permitted to close for maintenance. There is an opportunity to include these requirements within any future planning approval for the project. This would help to drive innovation in the design, construction, operation and maintenance of the project, and help to minimise the impact of closures on road users and the surrounding communities.

Recommendation 16

The scope for the New M5, including the city-bound approach to the existing M5 East tunnel should incorporate the world’s best systems and designs to stop over-height vehicles, and vehicles carrying dangerous goods from attempting to enter the tunnels.

This issue was identified in NRMA’s ‘WestConnex: Getting it Right’ report (See ‘Appendix A’ to this EIS submission, Recommendation ‘2a’). These include heavy vehicle diversion lanes, pull over bays, and active systems, for example, the ability to broadcast safety messages to warn drivers approaching the tunnel.

The increased tunnel height proposed for the New M5 is a very positive initiative. It does, however, add another level of complexity for drivers and for road operators and may potentially even lead to an increase in the numbers of over-height vehicles incidents in Sydney’s existing tunnels if drivers were to inadvertently assume all tunnels are the same height.

In order to mitigate this, NRMA recommends the New M5 and M5 East should incorporate the best systems and warning signs, backed by the Proponent making available good information using a variety of mediums for drivers of these vehicles.

Recommendation 17

The Proponent shall consult with road user groups such as NRMA in regards to the detailed tunnel design features

We are pleased the urban design and lighting concepts appear to have adopted NRMA's recommendations for improved lighting and tunnel features outlined in our 'WestConnex: Getting it Right' report (see Appendix A to this submission) as a way to reduce fatigue, improve safety and add interest.

Typically the EIS represents the final stage where the community may make detailed comments in relation to a project. We believe there is an opportunity for Transport for NSW, through its agency, Roads & Maritime Services as the client agency for the WestConnex motorway, to demonstrate its commitment to putting the customer at the centre of everything it does through ongoing consulting with road user groups in regards to the tunnel design features.

As outlined in the recommendations from the Inquiry into the Roads and Traffic Authority's response to an accident on the F3 Freeway near Jolls Bridge on 12 April 2010, "NRMA (and others) have propositions gathered from their community inter-actions and community consultation. Transport NSW and the RTA could do no worse than to listen to the community through these representative groups.

Doubtless, any community-based debate and consultation will evoke different points of view on different issues and consensus may not always be possible. To not engage in the debate in the first instance is a grave misjudgement. Ultimately, it is the community and groups like the NRMA who seek to aid road and traffic management, and their knowledge and commitment ought not to be discounted."

Recommendation 18

The Proponent shall publish the operational requirements for the motorway in regards to identifying, responding to and clearing incidents, such as crashes and breakdowns.

Publishing this data will provide road users with transparency in regards to these key aspects of the toll road operator's obligations. In conjunction with the proposed recommendation below, it will ensure there is a key focus on the road user as the customer and will help to limit the impact of these incidents on surrounding streets.

Recommendation 19

The Proponent shall publish detailed information each month in regards to the performance of the motorway. This must include details of traffic volumes both on the mainline motorway and by ramp, incident data including numbers of crashes and breakdowns, the duration of these incidents and the response times for dealing with these incidents.

Detailed traffic and incident data is difficult to obtain for existing Sydney toll roads. This makes it difficult to establish how well the road is performing and whether the operator is complying with its contractual requirements.

We believe there is an opportunity for Transport for NSW, through its agency, Roads & Maritime Services as the client agency for the WestConnex motorway, to demonstrate its commitment to putting the customer, in this case the road user, at the centre of everything it does by publishing regular, detailed information in regards to the performance of the motorway.

As well as the congestion impacts, the level of safety (including the potential for secondary crashes) is largely dependent on the motorway operators and the people performing rescue services.

NRMA's Decongestion Strategy highlighted how traffic jams on busy motorways can build at the rate of 1.5 kilometres per minute. When something does go wrong in the New M5, the M5 East, or on other sections of WestConnex, it has the potential to quickly create 'gridlock' across Sydney, severely impacting on people's lives and on businesses.

This recommendation by NRMA is intended to encourage both design innovation in order to keep traffic moving and reduce the number of crashes and breakdowns, as well as improved management of these incidents when they do occur.

Recommendation 20

The Proponent shall ensure the capacity of the M5 East and New M5 detour routes are not reduced.

The predicted high level of traffic diversion away from the M5 East, in addition to the high number of times the existing M5 East is closed for maintenance and for incidents, all highlight the need to improve, not reduce the amount of capacity on the adjacent routes.

It is critical the New M5 / M5 East detour routes maintain sufficient capacity to cater for the high traffic volumes that will be diverted to the surrounding streets, whenever WestConnex is closed.

The EIS indicates bus priority measures are being considered by RMS but provides no detail and NRMA has been unable to source any more information from RMS on this issue.

The M5 East is currently Sydney's longest road tunnel. When combined with the other sections of WestConnex, the New M5 will comprise the longest road tunnel in Australia. Driving through

WestConnex will be a new experience for Sydney's motorists. With mistakes by motorists contributing to 95 per cent of crashes, the challenge is to make it a good experience.

Whilst Sydney's existing road tunnels generally have a reasonable safety record, the longer the tunnel, the greater the likelihood of an incident, such as a crash or breakdown somewhere in the tunnel. NRMA's studies also show that the busier Sydney's motorways get, the more crashes occur.

When a big incident occurs on a surface motorway, like the M5 West, traffic is generally allowed to continue along the motorway and leave at the last exit prior to the incident. However, when these types of incidents occur in tunnels, the whole tunnel is typically closed and traffic, both private and public on the surrounding surface streets and adjacent motorways slows to a crawl. This is why NRMA has put forward recommendations that aim to ensure WestConnex is designed and operated to minimise the number and duration of crashes and breakdowns.

Recommendation 21

The Proponent shall ensure the lane widths on detour routes are sufficiently wide to safely cater for large trucks, including petrol tankers that are not permitted in the tunnels, so as to minimise the potential for conflict with other vehicles and vulnerable road users, such as cyclists and pedestrians

Recommendation 22

The Proponent shall install a continuous line of profiled line marking [raised markings] as an edge line outside the tunnels to delineate the traffic lanes from the road shoulder and provide both a visual and audible alert to any motorist deviating from the carriageway. This will improve safety for anyone using the road shoulder, such as broken down vehicles, or maintenance workers, and will improve delineation, particularly at night and in wet weather.

The following recommendations specifically relate to the Construction Phase of the project

The EIS states the project would generate 2.7 million cubic metres of spoil, all of which will be moved by truck. This is 300,000 cubic metres more than the M4 East's 2.4 million cubic metres of spoil. The cumulative impacts on traffic and road safety during the multiple construction phases of the WestConnex and NorthConnex projects have not been assessed.

Recommendation 23

The Proponent shall prohibit spoil truck movements in the AM and PM weekday, and weekend road traffic peaks

NRMA is concerned the proposal for all spoil to be removed by truck will increase congestion and have an impact on safety on some of Sydney's busiest road corridors, particularly during the AM and PM weekday, and weekend peaks.

It is unclear why the EIS states that "feasible and reasonable management strategies would be investigated to minimise the volume of heavy vehicle [spoil] movements at night" from the Marsh Street construction compound when the same requirement has not been applied to the other construction compounds.

The EIS Appendix G, Section 7.4.2.2 Table 47 states the Marsh Street / M5 East Motorway interchange operates at Level of Service (LoS) B in the AM peak and LoS C in the PM peak and that this will be unchanged during the construction phase of the Project.

In reality, extensive delays are experienced at this intersection due to heavy traffic volumes, and the need for the two right turn lanes of traffic from Marsh Street to merge to a single lane within the outbound M5 East tunnel on-ramp, before merging again with the two full lanes of traffic coming from Southern Cross Drive. The back of queue regularly extends for a considerable distance around Qantas Drive, which has not been acknowledged by the simplistic LoS analysis and also into the M5 East city-bound in the AM peak weekday and weekend peaks.

The mid-block performance for Marsh Street indicate that between the M5 East and Flora Street it will operate beyond or close to capacity during the AM peak hour (See in EIS Volume 2B, Appendix G, Section 7.4.2.3). Table 48 indicates similar issues for Wickham and West Botany Streets. Tables 58 and 59 also indicate similar issues in relation to the St Peters construction compound. The EIS does not offer any solutions to any of these issues, such as prohibiting spoil movements during the peak hours.

In terms of minimising the impact on traffic, permitting spoil removal at night is preferable to moving spoil during peak periods, providing appropriate noise attenuation measures are put in place to reduce noise impacts on adjacent residents, as previously recommended by NRMA in this submission.

Recommendation 24

The Proponent shall apply additional safety features to improve road safety associated with the operation of trucks on the project. Examples of appropriate safety features could include front / side / rear under-run protection, video monitoring and speed control.

We believe the NSW Government has an opportunity to take a very proactive step forward in road safety by requiring contractors on its projects to use only vehicles fitted with the best level of safety technology available.

In London, a 'Safer Lorry Scheme' has recently been introduced to ensure that only trucks with a certain level of safety equipment fitted will be allowed on London's roads.

The London scheme was introduced in response to construction vehicles being involved in a disproportionate number of fatal collisions involving cyclists and pedestrians.

The scheme requires vehicles over 3.5 tonnes to be fitted with:

a) Class V and Class VI mirrors to give the driver a better view of cyclists, pedestrians and other vehicles
b) Side guards to protect cyclists and other vehicles from being caught under the wheels of trucks in the event of a collision
c) Proximity sensors to help identify other road users in blind spots. For more information on the type of technology that is available on the market see:

http://www.backwatch.co.uk/
http://www.backwatch.co.uk/products/blindspot-detection-system/

We believe similar measures should be required as part of any conditions of approval for the WestConnex project.

NRMA also believes the Government should require that all new vehicles, and any new classes of vehicle that are permitted to carry spoil as part of the WestConnex project should be fitted with:

d) Autonomous Emergency Braking (AEB)
e) Electronic Stability Control (ESC)

The EIS indicates that higher productivity vehicles will be permitted to carry spoil for the project, meaning that bigger vehicles with more mass and momentum will be travelling on Sydney's roads.

AEB has been a compulsory fitment to heavy vehicles in the European Union since 1 November 2015. With the majority of Australian truck manufacturers being owned by European manufacturers, the technology will be well known to these companies and this should make it easier to transfer this technology to trucks operating in NSW.

In addition, we would like to see the following:

f) Side and rear under-run protection on rigid trucks. This would represent a positive safety initiative to protect light vehicle occupants.

The following weblink identifies the safety issues associated with underrun:
http://www.iihs.org/iihs/news/desktopnews/new-crash-tests-underride-guards-on-most-big-rigs-leave-passenger-vehicle-occupants-at-risk-in-certain-crashes

In terms of truck and dog trailers, the rear wheels typically provide under-run protection but there are opportunities to improve side under-run.

g) All vehicles associated with the project should be required to be marked with retro-reflective strip or contour markings to enhance road and workplace safety by making the vehicle more conspicuous and by delineating its size and length

This is a very low cost safety initiative that can dramatically reduce the potential for crashes involving heavy vehicles.

The Australian Trucking Association, together with industry representatives, has developed an advisory procedure to provide a best practice guide to heavy vehicle visibility.

The advisory recommends the use of retro-reflective strip or contour markings to delineate the length and size of the vehicle, as well as using reflective graphics and corporate logos to increase visibility.

For more information on the ATA guide, see:
http://www.truck.net.au/resource-library/heavy-vehicle-visibility-advisory-procedure

The other issue is to ensure the construction vehicles are washed regularly to ensure the markings are clearly visible.



Photo of truck and dog trailer without retro-reflective strip or contour markings

h) We also believe road safety associated with the significant spoil operations for the New M5 may be enhanced through a planning condition requiring spoil trucks associated with the project utilise:

Driver and outward facing on-board cameras that are G force and driver activated, along with remote monitoring. There are many types of on-board camera systems available, for example see: http://www.iae-services.com.au/drivecam-in-vehicle-driver-safety-risk-management-camera-system.html

This would appear to be a relatively easy contractual requirement as this is a technology that can be retrofitted. These cameras have the additional benefit of providing evidence to show when a truck has been involved in a crash through no fault of the driver.

i) A variety of speed warning, monitoring and control systems are available that can alert the driver when travelling over the speed limit, remotely monitor and report on instances when this occurs, and also physically limit the maximum speed of the vehicle to the posted speed limit.

Including these within any planning condition of approval for the project would help to monitor driver and vehicle behaviour and ensure that workplace safety for drivers and vehicles associated with the construction of the New M5 project extends beyond the construction sites to also encompass the public road network.

Recommendation 25

The Proponent shall reassess the proposed spoil routes for the project

The restricted area of the study area that is also the identified previously in this submission has also limited the assessment of the spoil truck routes. For example, the EIS does not contain any assessment of the impact of the Bexley Road south operations on the key intersections of Stoney Creek Road and Forest Road, Forest Road and Bexley Road, and Bexley Road and Slade Road.



Image showing existing traffic congestion at Bexley North railway overpass close to the proposed WestConnex construction sites.

Whilst the actual volume of spoil trucks may be low when compared to existing traffic volumes, when intersections are already failing to cope with the existing demands and operating at LoS F, the addition of spoil trucks will undoubtedly increase congestion.

The EIS indicates B-double trucks and other high productivity vehicles will be used to haul spoil. These vehicles have restricted manoeuvrability, evidenced by how existing B-double trucks currently straddle both lanes at intersections such as Stoney Creek Road / Forest Road, and Wickham and West Botany Streets, city-bound.

The proposed spoil routes will require spoil trucks to do the same in order to turn from Forest Road to Bexley Road. Additionally it should be noted that these vehicles are slow to take off from a standing start. Since the EIS predicts nearly one truck every two minutes will travel via these routes in the AM and PM peaks, they will significantly affect the performance of these intersections, adding to congestion.

The EIS does not explore any options that would enable spoil to be transferred via means other than by road from the Bexley Road south construction compound to the Bexley Road North compound. This would enable trucks to return via the M5 East, thereby avoiding the congestion and road safety issues outlined above.

The EIS does not acknowledge that the M5 East is closed multiple times every year for both planned and unplanned maintenance and during incidents. This will necessitate spoil trucks diverting along with all the other tunnel traffic to surface streets, increasing traffic congestion along the diversion routes of Forest, Stoney Creek and King Georges Road, none of which have been assessed in the traffic and transport report.

An NRMA Freedom of Information request in 2010 revealed the M5 East was closed 72 times for planned maintenance and 45 times for unscheduled maintenance between July 2009 and July 2010, far more than any other road tunnel in Sydney.

Recommendation 26

The Proponent shall ensure that the Construction Traffic Management Plan restricts the use of compression braking by spoil trucks, particularly on steep sections of roads such as Bexley Road between Forest Road and Kingsland Road South

Compression braking noise travels long distances along main roads and side streets, particularly at night when background noise levels are lower. The use of compression braking should be restricted to minimise impacts on nearby residents and businesses.

Recommendation 27

The Proponent shall ensure that the project Construction Traffic Management Plan requires all spoil trucks associated with the Bexley North south construction area to use the kerbside lane when travelling on Bexley Road westbound between Barnsbury Grove and Shaw Street.

This recommendation is intended to enhance road safety by minimising conflict between spoil trucks and other road users. It will ensure that spoil trucks are in the correct lane for entering the construction sites well in advance prior to entering the construction sites.

By removing any temptation for drivers of spoil trucks to travel in Lane Two as a means of bypassing the existing traffic queues in the kerbside lane, it will avoid the need for these trucks to:
(a) Undertake a right to left merge into the kerbside lane to avoid right turning traffic into Barnsbury Grove (including a large amount of school traffic) and;
(b) Attempt the very difficult right to left merge into the kerbside lane on the approach to Shaw Street in order to avoid right turning traffic in Lane 2 turning into Slade Road.

Recommendation 28

The Proponent shall extend the crash guardrail adjacent to the kerbside westbound lane at the Bexley North railway overpass further towards the intersection with Shaw Street and install crash protection for pedestrians on the footpath between the bus stop to the east of this location and the intersection with Shaw Street

The Proponent shall also provide crash protection for pedestrians on the footpath adjacent to the kerbside westbound lane of Bexley Road approaching Shaw Street

(a) This recommendation is intended to provide protection for pedestrians on the footpath from errant vehicles associated with the large number of lane changing movements on the westbound approach in Bexley Road to the Shaw Street intersection. It will have the additional benefit of deterring pedestrians travelling to and from the Bexley North railway station from the current unsafe practice of trying to cross Bexley road in two stages by propping on the narrow central median island on the overpass.



The above Image reveals how the guardrail does not extend back to Shaw Avenue. The image also shows the narrow central median island that pedestrians use as a two stage crossing of Bexley Road.

(b) The recommendation to also provide crash protection for pedestrians on the footpath adjacent to the kerbside westbound lane of Bexley Road approaching Shaw Street is to improve safety due to the large numbers of vehicles making late right to left merge lane changing manoeuvres at this location and the high potential for spoil trucks to be involved in conflicts with these vehicles and to mount the footpath. Vehicles have previously left the road, crossed the footpath and crashed into shops at this location.



Example showing pedestrian light pole that has been hit on the Bexley Road footpath approaching Shaw Street and the proposed WestConnex construction site at Bexley North. The low hedge provides no protection for pedestrians using the footpath and errant vehicles changing lanes at this location have previously crashed into the adjacent pizza shop.

Appendix A - WestConnex: Getting it Right

WestConnex: Getting it right

NRMA's recommendations for:
New ways to keep WestConnex moving
New ways to minimise crashes and breakdowns
New ways to manage crashes and breakdowns
Celebrating tunnel infrastructure

July 2014

About The National Roads & Motorists' Association

The National Roads and Motorists' Association (NRMA) comprises 2.5 million Members in NSW and the ACT. For more than 90 years, NRMA has represented the interests of motorists, delivering better results for our Members by lobbying for better roads, increased road infrastructure funding, new ways to manage congestion and improve safety, fairer licensing for older and younger drivers, better value petrol prices, greener motoring and much more.

Background to this Report

This Report identifies a number of relatively low cost ways to improve the design and operation of WestConnex and particularly its road tunnels.

The design and approval process for road tunnels understandably has a large focus on traffic modelling, fire and life threatening safety issues, and managing construction impacts such as noise and impacts to road users. Within this context, however, new ways to improve traffic flow and road safety have not always been given the attention they deserve.

NRMA strongly believes that WestConnex must learn from past mistakes. The recommendations and ideas in this Report are not meant to be exhaustive, but we believe they can contribute to making a positive difference for road users, and form the basis for generating other ideas.

Comments and Queries

All comments and queries about this report may be directed to:

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Introduction

WestConnex is one of the most important transport infrastructure projects undertaken by the NSW Government in a generation. Not since the construction of the Sydney Harbour Bridge in the 1920s and 1930s has an infrastructure project had such potential to shape and influence Sydney's long term future and economic sustainability.

Just like the Sydney Harbour Bridge, it is crucial that the NSW Government and the WestConnex Delivery Authority ensure that WestConnex is designed to stand the test of time.

At approximately 13 kilometres long, the WestConnex Stage 1 tunnel between the M4 and St Peters will be the longest road tunnel in Australia, three times the size of Sydney's M5 East tunnel.

It is just one of an unprecedented number of proposed new road tunnels to be dug under Sydney. The WestConnex and NorthConnex tunnel projects combined will add an extra 26 kilometres (a 73% increase) to the existing 15 kilometres of major road tunnels. More tunnels are also currently being considered as part of the WestConnex extension to Victoria Road, for the F6 extension and for the Military / Spit Road corridor on the North Shore.

At 33 kilometres, WestConnex is the largest of a group of toll road projects proposed by the NSW Government to help keep Sydney moving. Once completed, it will provide important connections between Western and Southern Sydney, Sydney Airport and Port Botany, as well as with the Western Distributor and the North Shore.

It will help to deliver significant economic and social benefits for Sydney through faster and more reliable travel times, helping to relieve chronic congestion problems in Western and South Western Sydney on the M4 and M5 motorways. It will help in overcoming the sharp divisions between the west and east of Sydney, and will help fuse Sydney into a single housing and labour market.

WestConnex will also help to revitalise Parramatta Road, which has suffered from chronic traffic congestion, as well as creating opportunities to revitalise other roads, such as Forest and Stoney Creek roads through Bexley, and sections of the Princes Highway.

Over a number of years, NRMA has strongly advocated for the construction of WestConnex and the other missing links in Sydney's motorway network. Following NRMA's *Seeing Red on Roads* campaign in the lead up to the 2011 NSW State Election and the Australian Automobile Associations (AAA) *Demand Better Roads* campaign during the 2013 Federal Election, the NSW and Australian Governments announced a combined $3.3 billion commitment to allow construction of the first stage of WestConnex to begin in 2015.

NRMA is a strong supporter of WestConnex and welcomed the decision of the NSW and Australian Governments to commit funding towards its development. However, it must be noted that NRMA's support for WestConnex is not unconditional.

NRMA has clearly expressed to the NSW Government that it is crucial that it gets the planning right to ensure that WestConnex delivers value for money for motorists and caters for future growth. It is crucial that WestConnex provides a future proofed and lasting infrastructure solution, and the recommendations contained in this Report are intended to benefit motorists by helping to guide the development of WestConnex and future motorway projects.

Recommendations

Recommendation 1: New ways to keep WestConnex moving

NRMA recommends the NSW Government ensures that the WestConnex motorway is designed to keep traffic moving, both now and into the future.

The challenge, particularly with the WestConnex tunnels, is to get the design right up front, as there are limited opportunities to fix any problems once the motorway is open to traffic.

WestConnex must adopt new thinking in the way it is designed and operated.
The main overriding objective for the WestConnex project must be long term effective traffic management, not lowest cost or revenue maximisation.

This means that WestConnex must:

(a) Have sufficient traffic lanes to cater for foreseeable future demand;

It is crucial that the NSW Government and the WestConnex Delivery Authority ensure that like the Sydney Harbour Bridge, WestConnex is designed to stand the test of time.

With tunnels typically costing four times as much as surface roads, and with motorists paying tolls to travel on WestConnex, it is imperative WestConnex is designed and operated to keep traffic moving both now and into the future.

If the severely congested M5 East tunnel had been built with three lanes instead of two, it reputedly would have added just $100 million to the $800 million cost – a massive difference compared with the current proposal to go back and construct a new tunnel.

(b) Be actively managed like the Monash Freeway in Melbourne, to minimise congestion and ensure that high traffic flows and travel time reliability can be maintained;

The days of pumping more traffic into a motorway system to join the back of a queue of stationary traffic are over. Allowing motorways to operate like car parks in peak periods just when we need them most should no longer be an option.

NRMA's Decongestion Strategy[i] revealed how the Victorian roads agency, VicRoads, has led the world in the development of motorway management systems. Sydney motorists continue to suffer from the 'business as usual' approach to managing motorways – neither of the recent upgrades to the M2 or the M5 motorways have embraced these systems.

In contrast, these motorway management systems will be operating on every freeway in Melbourne within the next five years, consistently maintaining high traffic flows in peak periods and enabling these critically important roads to be operated as a network, instead of as isolated links.

NRMA continues to have concerns that the 'in-house' system being considered by Transport for NSW for WestConnex will not perform as well as the tried and tested Melbourne system. Motorists paying to use WestConnex should have the best motorway management system.

(c) Ensure that entry and exit ramps and merge points are designed and operated to minimise motorway disruption and enhance safety;

WestConnex needs to make it easier and safer for motorists to merge with the main tunnel by extending the merging area within the tunnel on-ramps. This should be coupled with improved warning signs, road markings, and tunnel lighting to make it obvious where the merge takes place for both merging traffic and for traffic already in the main tunnel.

A previous NRMA report has revealed that two thirds (66%) of crashes on Sydney's motorways may be attributed to merge related issues[ii].

In stark contrast to travelling in tunnels, motorists travelling on surface motorways can usually see traffic about to join the motorway as it travels along the entry ramp. In response, motorists both on the ramp and those already on the motorway are able to adjust their speed and the gap between their vehicle and any vehicle in front.

In tunnels, however, traffic often appears from behind a tunnel wall to merge with very little warning. This has clear implications for both traffic flow and road safety, but in spite of this, tunnel on-ramps continue to be designed in the same way as surface motorways, with the same amount of distance provided for traffic to travel parallel to each other before merging[iii].

(d) Avoid right hand on-ramps (such as the Cross City Tunnel to Eastern Distributor southbound ramp). Right to left merges are very difficult for drivers, particularly for truck drivers, resulting in both congestion and road safety issues;

(e) Avoid right hand off-ramps (such as the M5 East city bound off-ramp to Bexley Road). These contribute to congestion and impact on safety as they require slower vehicles to travel in the right hand lane to access the off-ramp. The M5 East issue is exacerbated by the left to right weave across the motorway resulting from traffic entering the M5 East at King Georges Road to exit at Bexley Road;

(f) Consider the implications for traffic flow when choosing locations for speed cameras; Motorists braking at speed cameras can cause 'shock-waves' to travel back (or forward) along the tunnel, causing congestion and increasing the potential for rear end crashes by requiring other motorists to also brake);

(g) Avoid steep uphill and downhill gradients as these can cause traffic to travel at different speeds, disrupting traffic flow. Grades can also contribute to the formation of shockwaves where the disruption travels forwards or backwards along a motorway causing traffic to grind to a halt for no apparent reason.

Without a real horizon to guide motorists in tunnels, both uphill and downhill grades can be difficult for motorists to perceive. Opportunities should be explored to orientate tunnel wall panels or use patterns on these panels to help illustrate when the road is going up or downhill.

Recommendation 2: New ways to minimise crashes and breakdowns

The main WestConnex tunnel will stretch over 13 kilometres from the end of the M4 motorway to the Princes Highway at St Peters. It will be the longest road tunnel in Australia, three times longer than Sydney's longest existing tunnel - the M5 East. Driving through WestConnex will be a new experience for Sydney's motorists. With mistakes by motorists contributing to 95 per cent of crashes, the challenge is to make it a good experience.

Whilst Sydney's existing road tunnels generally have a reasonable safety record, the longer the tunnel, the greater the likelihood of an incident, such as a crash or breakdown somewhere in the tunnel. NRMA's studies also show that the busier Sydney's motorways get, the more crashes occur.

When a big incident occurs on a surface motorway, like the M4, traffic is generally allowed to continue along the motorway and leave at the last exit prior to the incident. However, when these types of incidents occur in tunnels, the whole tunnel is closed and traffic on the surrounding surface streets and adjacent motorways slows to a crawl. WestConnex must be designed to minimise the number of crashes and breakdowns.

This means WestConnex must:

(a) Have the world's best systems and designs to stop over-height vehicles, and vehicles carrying dangerous goods from attempting to enter the tunnels. These include heavy vehicle diversion lanes, pull over bays, and active systems, for example, the ability to broadcast safety messages to warn drivers approaching the tunnel;

(b) Use innovative lighting and design to guide drivers safely through the tunnel, to keep drivers alert, and to reduce fatigue and tiredness;

The design of tunnels can positively or negatively influence driver's feelings and actions including stress, panic and speed.

Tunnels can be monotonous for drivers due to their form (e.g. few intersections, one way flow). Fatigue or tiredness in drivers in tunnels is more prevalent. Truck drivers can experience these effects more than drivers of other vehicles due to the large distances involved whilst in transit.

Whilst drivers must not be unduly distracted by tunnel designs, there is the potential for different lighting colours and images to be projected to guide drivers, maintain interest and reduce fatigue. Potentially lighting could also be tailored to different times of the day.

Lighting could also be used to highlight the location and radius (tightness) of curves, green and red lighting could be used to alternately reinforce to motorists when an off-ramp is open or closed.

New forms of lighting are being used in Scandinavian tunnels, and the 'Vivid Sydney' festival[iv] has provided a flavour of what can be achieved with modern lighting. Some examples from overseas tunnels are provided later in this report.

(c) Avoid locating drainage pits along the wheel path of driver's vehicles; Observations by NRMA from the M5 East 'Cooks River' Tunnel in Sydney reveal that drivers appear to be uncomfortable travelling across these pits located in the right hand lane, causing some drivers to shift their vehicle position to the left to avoid the uneven ride across the pits. This places their vehicle much closer to vehicles in the adjacent lane, with consequent implications for traffic flow and road safety;

(d) Reduce the mass of signs facing drivers as they approach tunnels; At 200 metres out from the tunnel, motorists are preparing and lining themselves up for entering the tunnel. They are generally not focused on signs, other than looking for speed limit signs, and are unable to read and respond to the existing mass of signs;

For example, NRMA has queried why RMS, unlike VicRoads, requires three static signs associated with electronic variable speed limits. Reducing sign clutter was another recommendation from NRMA's Decongestion Strategy[v].

(e) Give national and international ITS experts and companies the freedom to recommend the systems and devices that should be used on WestConnex. This will help RMS and the TMC to identify and capture innovations;

RMS and the TMC have traditionally specified the devices and systems that should be included on private motorways. This approach can stifle innovation and limit private sector technology experts and providers from specifying what may well be better, or more cost effective technology.

This recommendation will help avoid the situation where RMS and the TMC failed to act on NRMA's previous suggestions and instead specified 20th Century technology on the recent M2 and M5 motorway upgrades.

This led to electronic variable message signs being installed that can only display amber text messages (instead of installing 21st Century signs that can display colour pictures of traffic signs along with text), along with fixed speed limit signs instead of variable speed limit signs.

NRMA has previously highlighted to RMS the benefits of installing picture VMS on the basis that "a picture tells a thousand words", helping motorists to recognise, process and respond quickly to information displayed on these signs. If picture VMS had been installed on the M2 and M5 upgrades it would also have helped road users who find word comprehension difficult, including people for whom English is a second language, have dyslexia, or other literacy deficiencies.

(f) Seek to positively influence driver behaviour by making sure motorists are aware that their actions are being captured on CCTV.

Recommendation 3: New ways to manage incidents and their impacts

Today, the M4 is Sydney's busiest motorway, carrying over 170,000 cars and trucks. More NRMA Members break down on the M4 than on any other road in metropolitan Sydney. Studies show that even a vehicle stopped in a breakdown lane can reduce the carrying capacity of a road by 250 vehicles per hour, as motorists slow when they drive past[vi].

Over the last ten years, NRMA has helped over 40,000 stranded motorists on the M4, coordinated from NRMA's Sydney Operations control centre strategically positioned next to the M4 / WestConnex at North Strathfield. Quickly responding and clearing incidents will be even more important for incident responders when WestConnex becomes operational.

As well as the congestion impacts, the level of safety (including the potential for secondary crashes) is largely dependent on the motorway operators and the people performing rescue services.

NRMA's Decongestion Strategy[vii] highlighted how traffic jams on busy motorways can build at the rate of 1.5 kilometres per minute. When something does go wrong on WestConnex it has the potential to quickly create 'gridlock' across Sydney, severely impacting on people's lives and on businesses.

To help address this, NRMA has identified a number of ways to better manage these incidents and their impacts when they do occur.

This means that WestConnex must:

(a) Include rigorous and detailed analysis about how traffic will be managed efficiently and how incidents will be minimised. This information should be made public in the same way that Environmental Impact Assessment information is made public;

(b) Ensure the detour routes maintain sufficient capacity to cater for the high traffic volumes that will be diverted to the surrounding streets, whenever WestConnex is closed. For example, new bus lanes proposed on Parramatta Road will need to be suspended during major incidents;

(c) Ensure the lane widths on detour routes are wide enough to safely cater for large trucks, including petrol tankers that are not permitted in the tunnels, so as to avoid conflict with other vehicles and vulnerable road users, such as cyclists and pedestrians;

(d) Be designed to minimise the number of times it is closed for maintenance;

NRMA's Decongestion Strategy revealed that the M5 East motorway was closed 72 times for planned maintenance and 45 times for unscheduled maintenance between July 2009 and July 2010[viii].

(e) Be designed to enable incident responders to deliver rapid response during traffic incidents such as crashes and breakdowns; For example, incident response vehicles, including heavy tow trucks, must be strategically positioned at either end of the tunnels and at key entry and exit points;

(f) Take a network wide approach to clearing incidents by enlisting help from private WestConnex incident response teams to quickly clear traffic incidents both upstream and downstream from the WestConnex entry and exit points;

Whilst these locations are outside the traditional 'lease' area controlled by private motorway operators, it would make sense to involving the WestConnex operators in the incident response on these roads, given the proximity and potential to cause congestion on WestConnex, added costs for motorists, and the impact on toll revenue for the operator. It would also help to avoid any delays in the Transport Management Centre responding to incidents.

For example, under this proposal, incident response crews based at the existing M5 East control centre overlooking Marsh Street would be able to respond to crashes and breakdowns on Marsh Street, or in the airport tunnel, both of which are outside the current lease area but directly affect traffic travelling to and from the M5 East.

(g) Resolve the perverse situation where key incident responders, such as the Transport Management Centre (TMC), Roads & Maritime Services, NRMA and the emergency services, are required to pay tolls in order to keep Sydney moving;

As an example, today on the M5 motorway and adjacent roads, the NRMA, along with the TMC and emergency services help to keep Sydney moving by providing 24/7 response to traffic incidents. In spite of this, each of these organisations (other than emergency service vehicles displaying flashing blue lights) are required to pay tolls.

Traffic incidents are unplanned events that reduce road capacity. A 2007 Austroads report showed how they "can have significant impacts on roadway system operations, and hence road users and the community. Within major urban areas, incidents are a major contributor to traffic congestion" [ix].

NRMA has previously highlighted the issue of incident responders paying tolls with Transport for NSW and the TMC. Unfortunately the opportunity to resolve this issue was not taken during the contract negotiations for the recent M2 and M5 motorway upgrades. This issue must be addressed.

(h) Provide travel time information to motorists, along with much greater access to CCTV camera images and ensure that motorists are aware that their driving behaviour is being observed whilst travelling on WestConnex.

Recommendation 4: Celebrate Tunnel Infrastructure

Sydney's bridges, such as the Harbour and Anzac Bridges, are celebrated as iconic structures and engineering marvels.

By their nature, tunnels are hidden away from view, but this should not mean tunnels and their facades can be ignored. NRMA believes that there are real opportunities to improve motorist's experiences in road tunnels and to celebrate tunnel infrastructure.

The following examples from around the world reveal what is possible for WestConnex.



Image 1.1 – Image of the Södra länken motorway, Stockholm, Sweden



Image 1.2 – Image of a private car park tunnel, London, United Kingdom[x]



Image 1.3 – Image of a private car park tunnel, London, United Kingdom[xi]



Image 1.4 – Example of traditional tunnel lighting Lane Cove Tunnel, Sydney, Australia[xii]

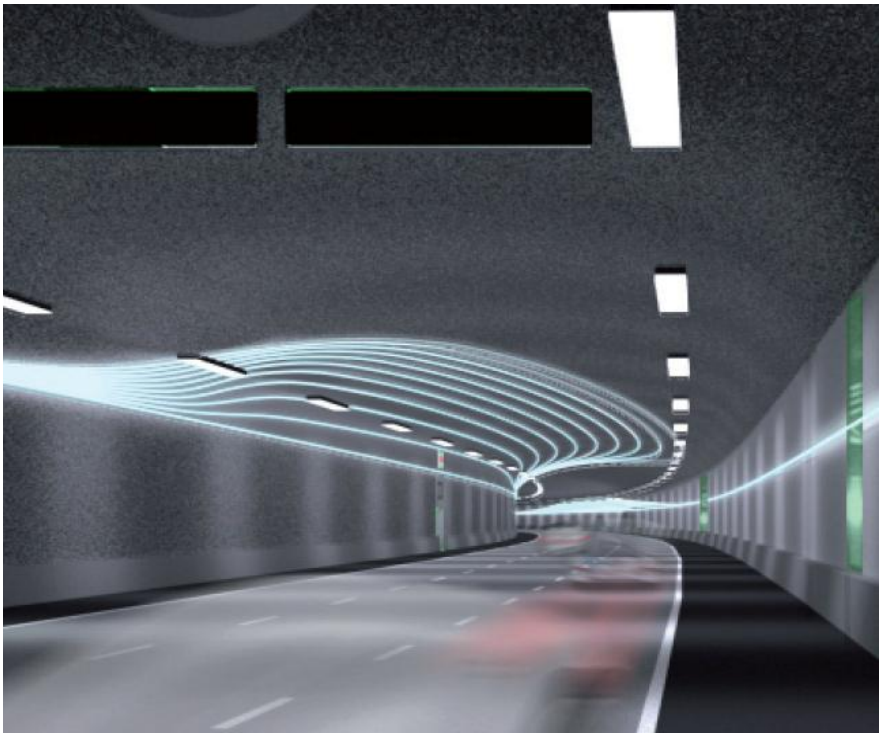


Image 1.5 – Concept design from the Stockholm bypass project (a new 21kilometres motorway with 18 kilometres of tunnels), Stockholm, Sweden[xiii]

Supporting Information

WestConnex is one of the largest road infrastructure projects ever undertaken in Australia. Not since the construction of the Sydney Harbour Bridge has a single infrastructure project had the capacity to influence the long term future and prosperity of Sydney. WestConnex is the next step in providing a truly connected motorway network in Sydney.

Based on figures provided by the NSW Government in the *NSW Long Term Transport Master Plan* Sydney's population is expected to grow from 4.3 million to around 5.6 million by 2031[xiv], with a majority of this growth occurring in the North West and South West Growth Centres. It is estimated by the NSW Department of Planning and Infrastructure that these areas will see a significant increase in population with over 181,000 homes expected to be built over the next 25 to 30 years[xv].

It is therefore critical that WestConnex is appropriately designed and constructed to ensure the safe and efficient movement of traffic in the long term, having particular regard to the expected future population growth and demand in the North West and South West Growth Centres.

It is arguable that many of the previous road infrastructure projects undertaken in Sydney in recent times have failed to consider a long term vision and have instead focused on the immediate or short term. Failure to anticipate or acknowledge future population growth and demand for road usage in Sydney has led to the construction of major road transport infrastructure projects that have reached capacity shortly after completion, causing lengthy delays and eventually necessitating difficult and expensive upgrades.

The opening of the two lane M5 East in December 2001 provides a good example of a project that failed to adequately address or anticipate future capacity issues due to increased road usage and Sydney's continued population growth. Soon after opening, the M5 East was already operating near capacity and today congestion extends across much of the day.

The M5 East sought to improve access between South Western Sydney, Sydney Airport and Port Botany, and the CBD, and aimed to reduce traffic congestion, improve traffic flow and remove heavy vehicles from local roads. These are not dissimilar to the planned goals for WestConnex.

Currently, 95,000 vehicles per day use the M5 East tunnel, many of these being heavy vehicles[xvi]. RMS has stated that congestion on the M5 East negatively impacts on access to Sydney Airport and Port Botany, hurting Sydney's economic productivity and competitiveness[xvii].

These statistics support the conclusion that the M5 East, while also partly a victim of its own success, failed to adequately address capacity issues during the planning and design phase. Many lessons have been learnt from the design, public consultation and operation of the M5 East and from the subsequent Cross City and Lane Cove Tunnels, but as NRMA's recommendations in this Report reveal, there are a large number of other issues that also need to be considered for WestConnex.

Designing the WestConnex Stage 1 Tunnel – M4 to St Peters

The longest of the WestConnex tunnels, between the M4 and St Peters, will be 13 kilometers in length, making it the longest road tunnel in Australia, and one of the longest road tunnels in the world. It is therefore important that the tunnel is designed to allow for the efficient movement of traffic and to ensure the number of incidents and closures to the tunnel are minimised.

The main WestConnex tunnel will also be Sydney's longest road tunnel, more than three times the length of M5 East tunnel, which is currently Sydney's longest road tunnel. The graph below provides a comparison of the proposed WestConnex tunnel with other tunnels currently in operation in Sydney.

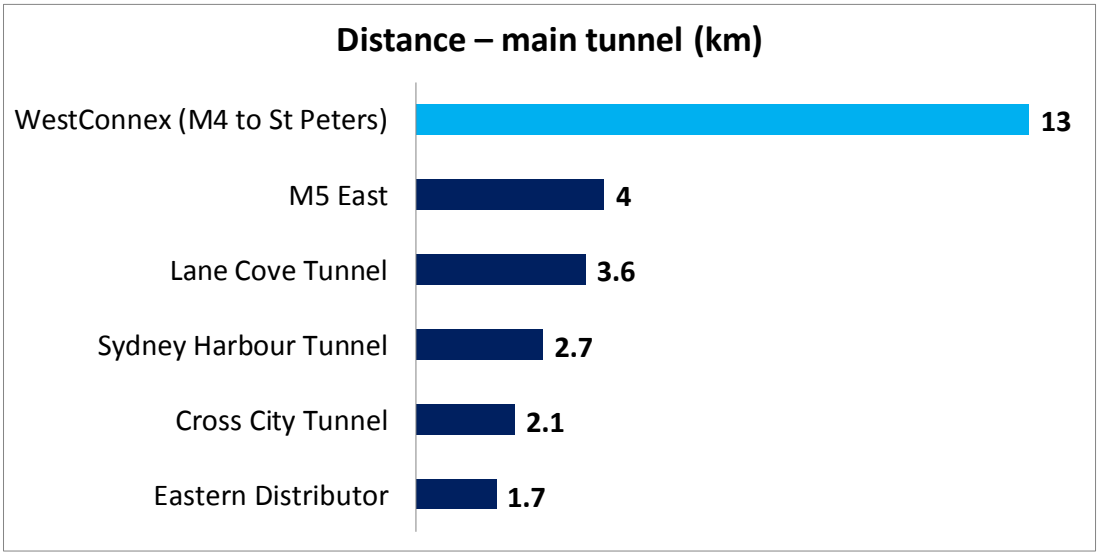


Figure 1.1 – Comparison of WestConnex with other road tunnels in Sydney

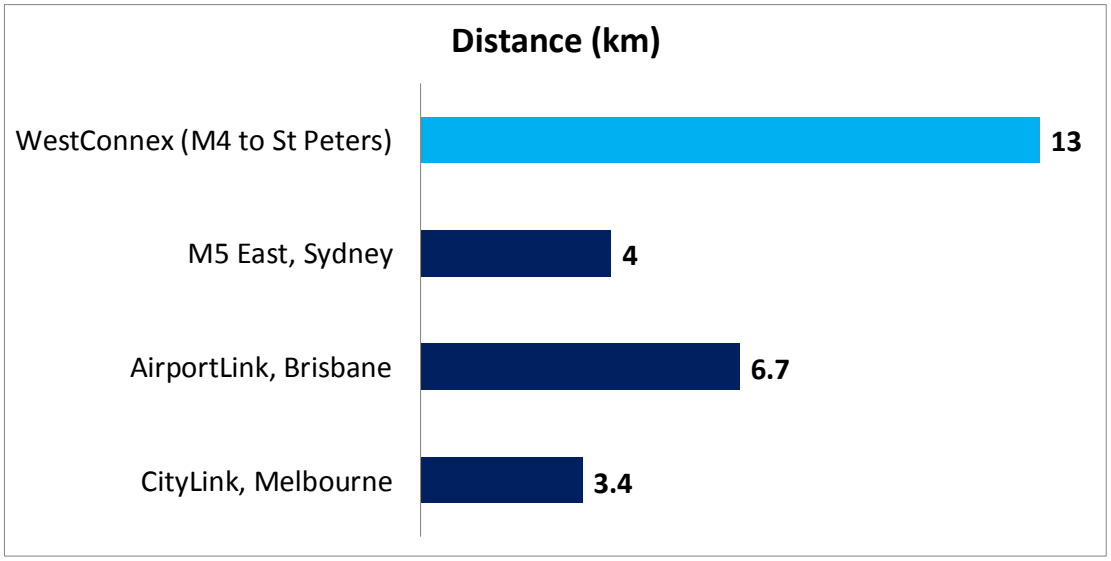


Figure 1.2 – Comparison of WestConnex with other existing road tunnels in Australia

Incorporating the longest road tunnel ever built in Australia, the WestConnex tunnels will require the world's best systems and designs embedded into the project to facilitate the efficient flow of traffic and provide a safe road environment for motorists. Taking the traditional approach to tunnel design and simply replicating the design of previous tunnel projects is unlikely to be sufficient for mega projects like WestConnex.

In constructing WestConnex, it is important that lessons are learnt from previous projects like the M5 East to ensure compromises are not made to critical elements of the design such as on and off ramps. It will also be important to ensure basic errors such as the construction of steep grades and right hand on and off ramps are not repeated in the design of WestConnex.

Incidents involving overheight and heavy vehicles

A key aim of WestConnex is to provide quicker and more reliable trips between Western Sydney, the Sydney Airport and Port Botany to assist freight movements[xviii].

Sydney motorists know all too well the congestion associated with overheight vehicles that illegally attempt to enter the city's major road tunnels. Nearly every month, overheight vehicles are caught on the approach to tunnels, blocking traffic and causing extensive delays. As recently as 14 November 2013, an overheight vehicle caused significant damage to the M5 East tunnel during the morning peak, causing long and frustrating delays for motorists[xix].

Heavy vehicle drivers travelling through Sydney's other major road tunnels are subject to height restrictions[xx]. However many operators of heavy vehicles are either ignorant of these requirements or choose to take risks and simply ignore warning signs placed on the approach to the tunnels.

In an attempt to address this issue, the NSW Government has already signaled its intention to ensure the WestConnex tunnels are constructed higher than existing tunnels, but the WestConnex tunnels will also need to be equipped with advanced technologies and solutions to deter overheight vehicles from entering and potentially damaging the WestConnex tunnel.

The importance of managed motorways

For many years, NRMA has raised concerns about the reluctance of RMS to embrace the concept of managed motorways. A managed motorway approach seeks to use integrated technologies to manage the road network to reduce travel times, improve reliability and increase road safety[xxi].

In May 2011, NRMA released a comprehensive strategy titled *Decongestion – 10 ways to relieve Sydney's traffic headache*[xxii]*. The Decongestion Strategy* noted that up to 25 per cent more capacity could be achieved from Sydney's existing motorways by simply changing the way they are managed, and by adopting proven technology[xxiii].

NRMA strongly believes that all new or upgraded motorways in NSW should incorporate an electronic freeway management system. Indeed, the ARRB Group has stated that the implementation of such systems 'should be considered whenever a new urban motorway is to be built or upgraded[xxiv]'.

Considering the high costs involved in building Sydney's motorway network, it makes sense to ensure that traffic using the network is properly managed using the latest and most advanced technologies. NRMA is disappointed that RMS failed to incorporate managed motorway principles and new technologies in either the M2 or M5 motorway upgrades. Trying to retrofit the devices and widened ramps will not only be costly, but also difficult to construct now that additional traffic resulting from the widening will need to be contended with.

The failure of RMS to embrace managed motorways for these upgrades is in stark contrast to the approach adopted by VicRoads in upgrading and managing Melbourne's road network. Melbourne's Monash Freeway uses intelligent transport systems such as information, communication and control systems to manage traffic flows, including motorway entry, lane use and driving speeds[xxv].

VicRoads' adoption of managed motorways has delivered a 50 per cent improvement in travel times and a 50 per cent reduction in crashes on the Monash Freeway[xxvi]. Following on from this success,

the intention is for every freeway in Melbourne incorporates the same managed motorway technologies within the next five years. Queensland is now also implementing the Victorian system

NRMA believes that RMS must follow the lead of their counterparts in Melbourne and Brisbane and adopt the managed motorway principles in the design and operation of WestConnex. NRMA continues to have concerns that the 'in-house' system being considered by Transport for NSW for WestConnex will not perform as well as the tried and tested Melbourne system. Motorists paying to use WestConnex should have the best motorway management system.

Managing tunnel closures

The longer the tunnel, the greater the likelihood of unplanned incidents such as a crash or breakdown occurring somewhere in the tunnel. At 13 kilometres and more than three times the length of the current M5 East tunnel, this statement is particularly relevant for the main WestConnex tunnel. It is likely that the entire tunnel will be forced to shut down whenever a serious accident occurs within the tunnel. Therefore any serious incident within any of the WestConnex tunnels is likely to quickly result in traffic gridlock across the Sydney motorway and surrounding road network.

NRMA notes that following the release of NRMA *Decongestion Strategy* in 2011, the NSW Government adopted NRMA's recommendation to clear major road incidents on Sydney roads within 4 hours. This target has been included within *NSW 2021* as a target to help reduce travel times by improving the efficiency of the road network during peak times[xxvii]. It is crucial that the Transport Management Centre, the private motorway operators and emergency services meet this critical target when unplanned incidents occur on WestConnex.

To ensure the WestConnex tunnels remain resilient and adaptive in the event of major unplanned incidents, NRMA believes that the NSW Government must continue to pursue new ways to manage incidents. The NSW Police response to the NSW Government adopting the target clearance time has been very successful and has resulted in more crash investigators being sent to major incidents, and to Operation Freeflow where highly visible Police vehicles have been stationed on Sydney's motorways.

This Operation has helped to slash Police response times to motorway incidents on average from 18 to 6 minutes and importantly has helped to change driver behaviour leading to a 25% reduction in the number of crashes.

The overwhelming success of visible policing indicates that it is important to let motorists know that they are being watched whilst travelling on WestConnex and particularly within the tunnels.

NRMA has also recommended elements of the UK's CLEAR initiative[xxviii], such as using 3D laser scanning to quickly gather evidence at crash scenes can also help to reduce delays for road users.

Additionally, it is important that WestConnex is designed to ensure that detour and exit routes for the motorway have sufficient capacity to cater for vehicles that are unable to access the tunnels such as overheight vehicles and B-double petrol tankers. This will be particularly important should a major incident occur within the WestConnex tunnel, as all traffic will be required to these surface detour routes, mixing with petrol tankers and overheight trucks.

In such an event, NRMA believes that proposed bus lanes on Parramatta Road would need to be suspended and opened up to general traffic until the incident or breakdown is cleared by the emergency services and traffic is back to normal.

Innovative design to improve tunnel safety

Driving through lengthy road tunnels can quickly become tedious for motorists, with drivers experiencing greater levels of fatigue and tiredness. Clearly the longer the tunnel, the greater the likelihood of unplanned incidents such as a crash occurring somewhere in the tunnel.

This is particularly relevant for the longest of the WestConnex tunnels. This tunnel will be approximately 13 kilometres in length, double the length of Brisbane's Airport Link road tunnel. Not only will this make it the longest ever built in Australia, but it will also be one of the longest road tunnels built anywhere in the world.

As previously noted, the consequence of a major crash or incident in the WestConnex tunnel has the potential to cause gridlock across Sydney. Therefore it is important that the WestConnex tunnels are designed to minimise the number of unplanned incidents that could potentially close the tunnel for significant periods of time.

Traditionally, Sydney's road tunnels have been designed and constructed with a number of safety features to assist motorists in the event of a major incident. These include emergency broadcasts, electronic message boards, flashing lights to guide motorists to emergency exits, fire extinguishers and emergency phones located at least every 60 metres, and 24 hour CCTV monitoring[xxix].

While it is expected that these safety features will be included in the design of the WestConnex tunnels, NRMA believes that due to the unprecedented length of the main tunnel, the NSW Government should consider incorporating best practice designs similar to those found in Scandinavian countries to keep drivers alert, and to guide them safely through the tunnel.

Tunnel design in Scandinavia

Some of the longest road tunnels in the world are located in Scandinavia. To help motorists safety navigate these long tunnels, Scandinavian road authorities have incorporated new technology solutions such as the use of innovative lighting displays in their design to make the driving experience safer for motorists.

The Lærdal Tunnel in Norway is 24 kilometres in length and is currently the longest road tunnel in the world, taking approximately 20 minutes to drive the length of the tunnel. Construction of this innovative tunnel commenced in 1995 and it opened to traffic in 2000, before Sydney's M5 East tunnel that opened in 2001, and well before Sydney's subsequent Cross City and Lane Cove Tunnels.



Image 1.6 – Image of the Lærdal Tunnel, Norway



Image 1.7 – Image of the Lærdal Tunnel, Norway

Given the significant length of the Lærdal Tunnel, the Norwegian Public Roads Administration (NPRA) designed the tunnel to ensure that motorists had a pleasant driving experiencing, incorporating new ideas to attempt to break the monotony of the long below ground trip[xxx].

Image 1.6 above provides an example of the innovative approach undertaken by the NPRA in designing the Lærdal Tunnel. The tunnel is divided into four sections and includes three 30 metre diameter halls, similar to that of Image 1.6 above.

The NPRA used simulators to determine the best lighting levels to use in the tunnels. As shown by Image 1.7 above, the main tunnel is lit white, with blue and yellow lighting used within the three caves, giving motorists the impression of a sunrise[xxxi]. The lighting in the caves are meant to break the routine for motorists, providing a refreshing view and allowing drivers to take a short rest from the perceived monotony of the tunnel.

It would not be difficult to incorporate new lighting designs within the WestConnex tunnels to enhance the driving experience for motorists, keeping motorists alert and providing a safer road environment which may assist in reducing the number of accidents within the tunnel.

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[redacted]

Title: Mr
Given Name: Peter
Family Name: Erling
[redacted]
Suburb: St Peters
State: New South Wales
Postcode: 2044
Subject: EIS response to Stage 2 impacts St Peters
Type of Enquiry: Comment
Message:
Here is my Westconnex M5 Stage 2 EIS response FYI i.e. F (Anyone's) I

You can submit your own response via:
https://westconnexeis.good.do/ACT/emailthenswdepartmentofplanningandenvironment/

Director Infrastructure Projects
Planning Services
NSW Department of Planning and Environment
Application Number SSI 6788

Dear Director,

I serve as a current, volunteer community member on Marrivkville Council Transport Committee.

I object to the 'WestConnex New M5' (SSI 6788) for the reasons outlined below, and offer the following constructive suggestions and local awareness of matters.

Under chapter headings from another significant EIS response my points fit in broadly these headings:
- Chapter 4 - Project development & alternatives
- Chapter 9 – Air quality;
- Chapter 11 – Human health;
- Chapter 13 - Urban design & visual amenity;
- Chapter 14 – Social & economic;
- Chapter 20 – Biodiversity;
- Chapter 21 - Greenhouse gas;
- Chapter 23 - Resource use & waste minimisation;
- Chapter 24 - Climate change risk & adaptation; and
- Chapter 27 – Sustainability

Camdenville Park Detention Basin

The detention basin in Camdenville Park is said to be under design for enlargement and is part of the justification for occupying the site where the BMX track is to be built. However it has been pointed out to SMC engineers that during flash flooding events on Campbell Street at the Town and Country Hotel location, water fills the road to about 0.5 metre depth but does not enter the detention basin, rather it drains slowly away over an hour through drains not connected to the detention basin. So the basin is not undersized currently, it just never gets run off into it. What needs fixing is that road water can drain into the basin so that it can perform as a detention basin and be pumped out by the two pumping pits it already has that rarely work now. There is only usually seen to be residual water sitting in the basin bottom that fell as rain into it, and this takes up to a week to evaporate and it is a cause of mosquitoes according to reports of the neighbouring houses that were interview in the BMX petition phase by us as BMX track proponents. So improving the drainage away to the pump out pits could be done or the creation of a wet land style basin as has been discussed in the past with board walks etc.

The Junior BMX pump track and trees

The location of the junior BMX Track in a Camdenville Park corner is to allow for potential future expansion should it prove popular and acceptable to the community. There was to be planting of trees for shades and shelter and visual amenity and to help with dust reduction from the road and railway. There are good specimens of mature trees on the corner of May Street and Campbell Street opposite the Town and Country Hotel that rather than be destroyed by proposed road widening, could be relocate to the BMX track area as final plantings or perhaps held with root ball protection for final implanting. These would save the cost of buying mature trees and provide better shade and landscape aesthetics than only small saplings planted to grow over 20 years of time.

Saving of existent trees air cleaning and visual amenity and variety.

The same applies for many of the proposed trees to be removed along Campbell Road, where having some full grown and large trees moved into the St Peters interchange will break up the visual monotony of all small seedlings and saplings that will take many years to reach the vision splendid of the EIS model of the St Peters Interchange. Mature trees are expensive to buy and transport over distances and the existing trees have proven they survive in the local climate and soils and they offset the carbon deficit of the huge amount of embodied carbon and energy in the concrete to be used for the tunnels and St Peters Interchange.
Large trees with canopy are existing habitat for birds, insects and locally adapted biodiversity. They also help to clean the air and lower the airborne particulates as has been proven in UK studies of trees planted in front of houses on busy roads where fine particulate dust levels in the homes was significantly reduced even by modest trees planted on the footpaths in front of the homes. In that case they were using native European birch trees which appeared to have remarkable dust gathering and holding capabilities. Other types of

vegetation's in plantings along roadways also helped improve air quality and amenity.
Given the tunnel exhaust stacks to be built near the St Peters interchange, the loss of any existing trees that could be reused is dire to air quality as young immature saplings will take years to form the same amount of leaf canopy and effectiveness as some retained mature trees can provide as companion re-plantings mixed in with new young trees that can grow and help to capture carbon and offset the huge carbon debt of the Stage 2 works.

Social impact of removing trees and saving historic buildings even partially as historic references

The visual amenity of the larger trees is important and so is the social impact of removing and destroying large existing trees to the feelings and emotional reactions in the community toward the project and the treatment of the area as a place to seemingly ravage at will to build an unpopular project as it is already with many residents. Saving trees and reusing them, as could the saving of some old heritage buildings by relocating them as practical reuse buildings or even as partial ruins as a reference to the past can help ameliorate the negative feelings toward a perceived disrespect for the local are and the community both past and present. It is fact that St Peters is the oldest planned suburb in Australia and was once highly desirable as a location for abode, as designed by A B Sparkes on land previously part of the 470 acre Thomas Smyth Farm estate from Cooks River to now St Peters Station, virtually all Tempe-St Peters area, later obtained by, owned and subdivided by sucessfull colonial merchant Robert Campbell in the 1830's inlcuding the land he donated for the St Peters church and a plan for the St Peters school included in the St Peters layout done by AB Sparkes.
Some of the old workers cottages on and near the corner of Campbell Street and Church Street may have a provenance that goes back to the very earliest housing for local workers as Campbell Street/Road appears in 1830's maps and is on old alignment of the Smyth Farm boundary to Charmers Farm seen in 1810 maps. Charmers Farm occupied the St Peters Triangle area of today. The stone and brick cottages to be demolished are probably very old! Preservation in some form shows a recognition of past and history and can include recognition of My Place as far back as indigenous culture. A children's book was written called My Place based on St Peters human cultural evolution as a living place and later became a wider children's Television series of stories based on people and place. St Peters has a history and a nod to that in this massive government project is not unreasonable to provide for.

Even Minister Hon Duncan Gay refers to people looking back on history and dieties and statues and the like in a mocking way, however there is real and important place for genuine recognition of past and place for St Peters and the major changes to be wrought upon it by this project.

Peter Erling.
St Peters NSW 2044
I would like a response: Yes

I object to westcon ex because it will make pollution and we ~~not~~ might get very very ~~sick~~ sick. From Adia Age: 6.

I give permission for my child Adia Lockie-O'Brien to make this submissio
Pauline Lockie, parent SSI 14_6788 4 Brown St St Peters
2042

12868

I object to westconex because our world will be more
 beautiful with no more roads and cars and ~~stalks~~ stacs.

Adia Age 6.

I give permission for my child Adia Locke - O'Brien to make this submission - Paulene Locke, parent SSI 14_6788

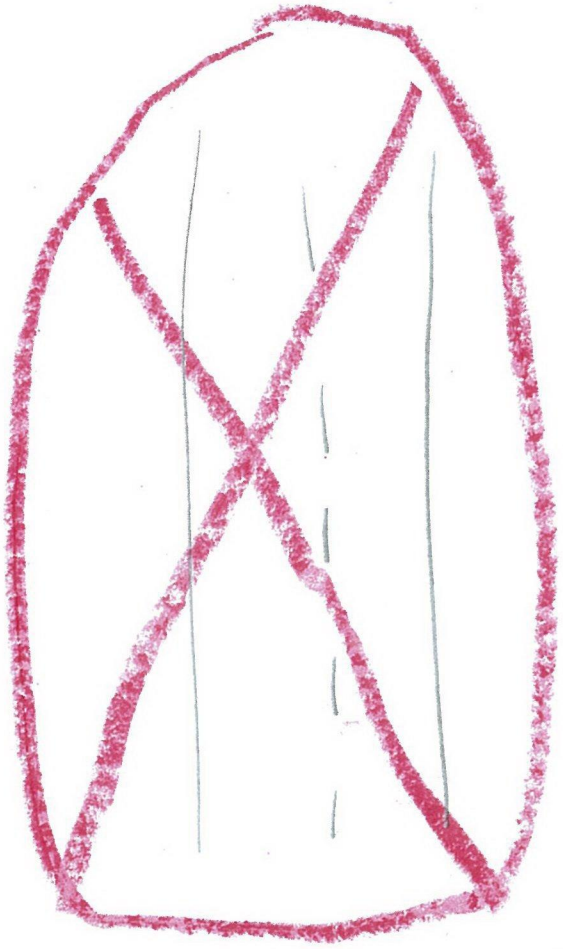
4 Braun St
St Peters 2044

12869

I object to westconex.

Adia

Age 26



I give permission for my child Kalia Lockie-O'Brien to make this submission.

Pauline Lockie, parent SSI14_6788

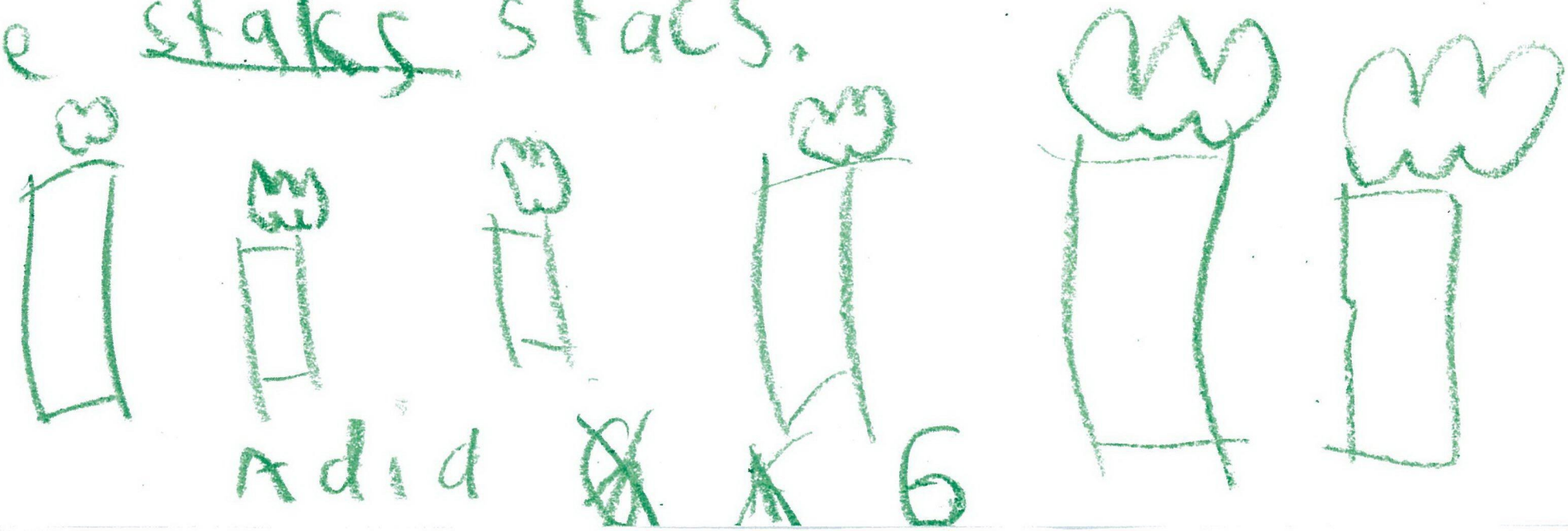
4 Brown St, St Peters NSW 2044

12870

I object to westconex ~~bo~~

because there ~~should not~~ shudent

be ~~stake~~ stacs.



Add 6

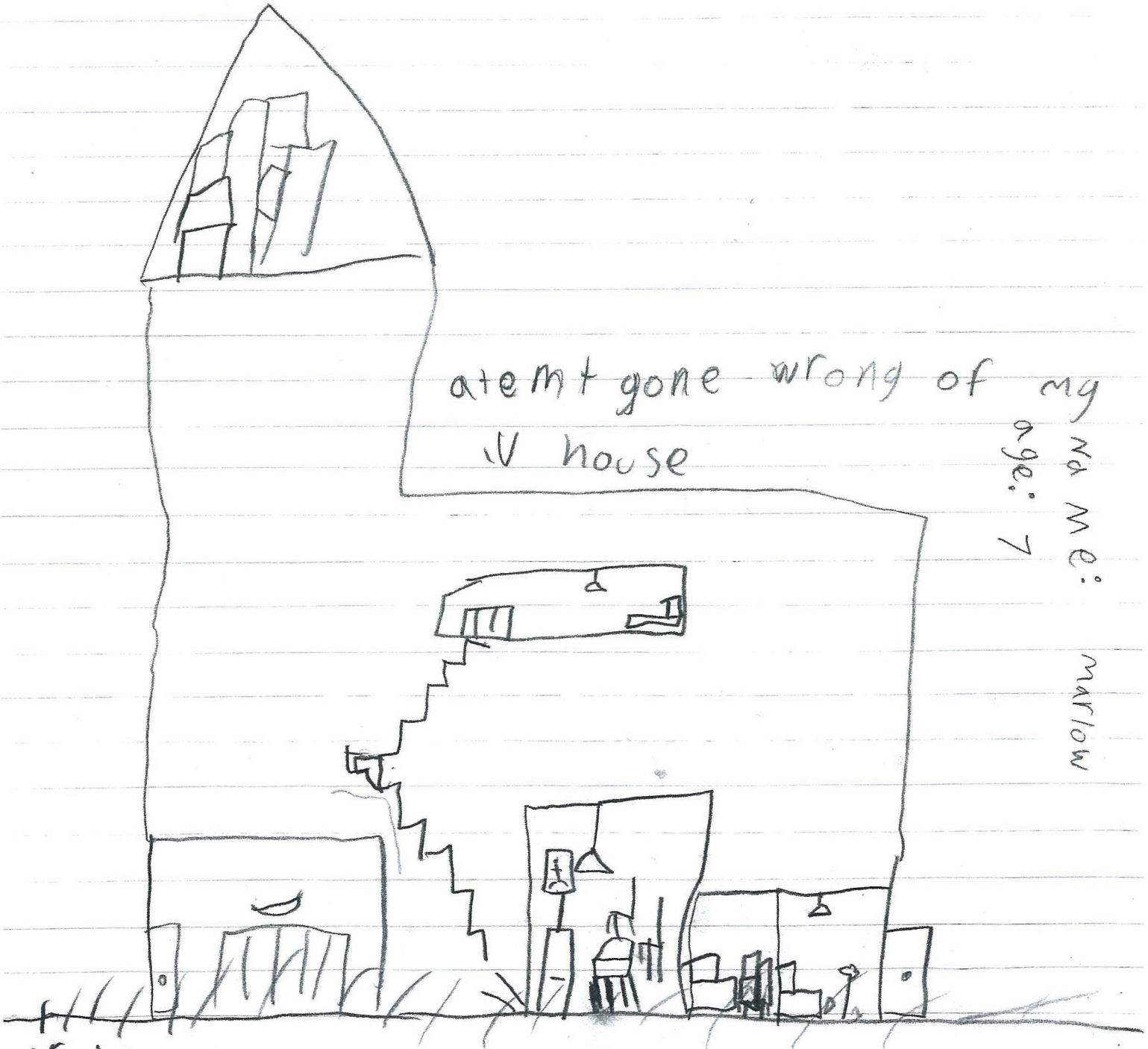
I give permission for my child Adia Lockie-O'Breen to make this submission.
- Pauline Lockie, parent SSI 14__6788 4 Brown St St Peters 2044

bi lox

because ✓

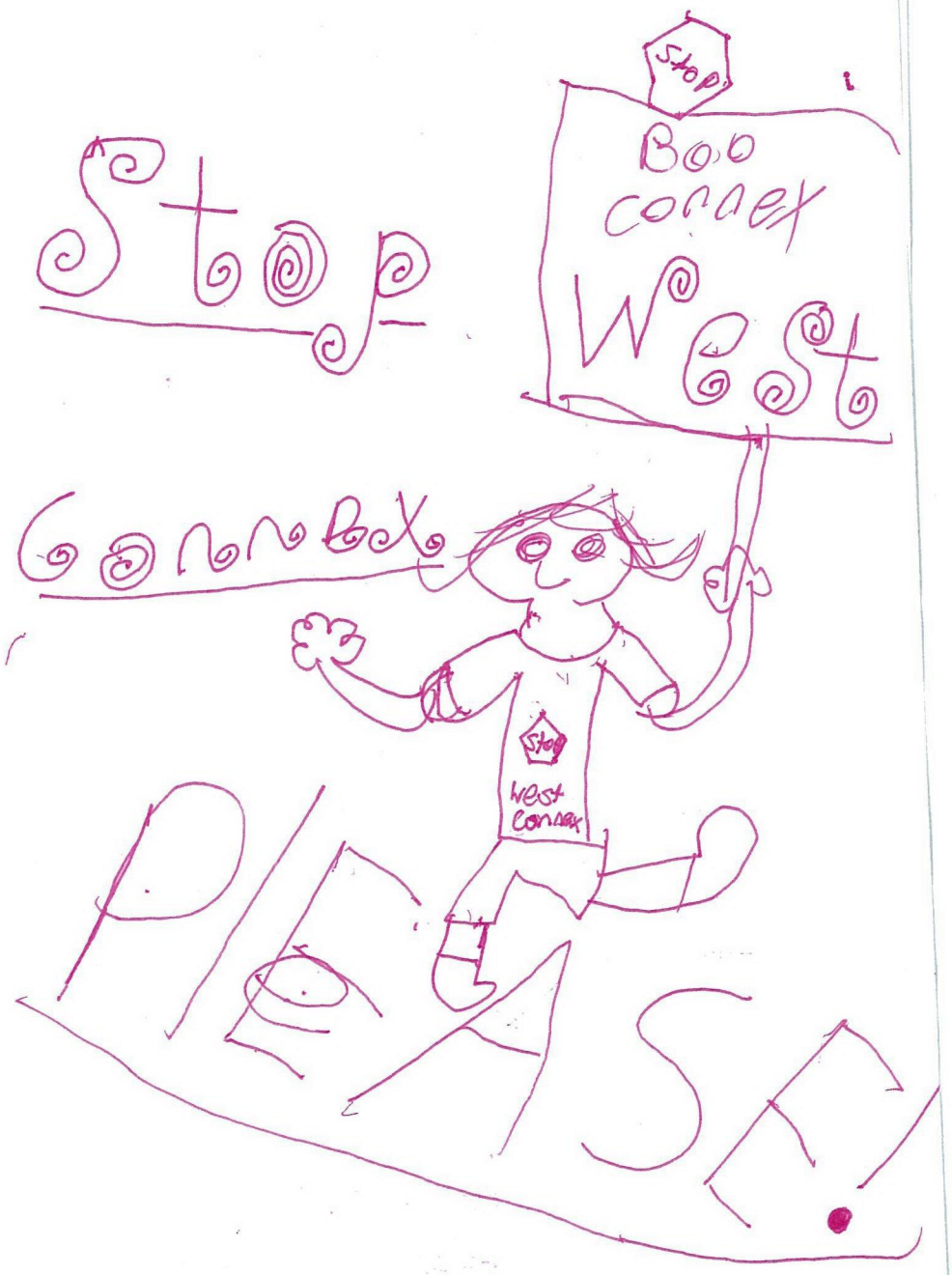
12871

To people planning West-
connex (even David) pretty please
don't plan it. I'll tell you why:
my friends will go and my
Lung will get really bad.



* if there is any david

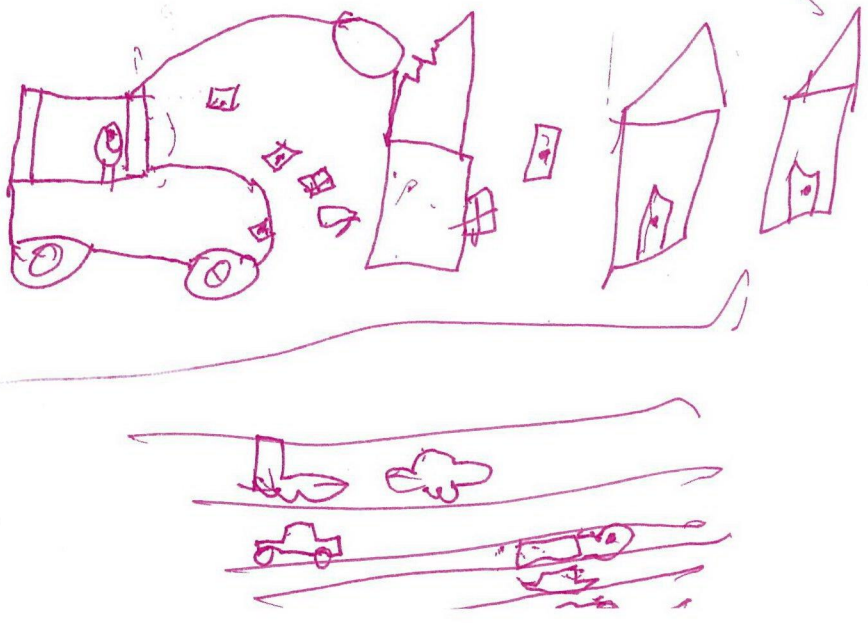
Submission to DP & E Project Number:
SSI 14_6788 Westconnex New M5



Dear Mr Turrebal (NSW Dept of Planning and Enviroment)

We  hat

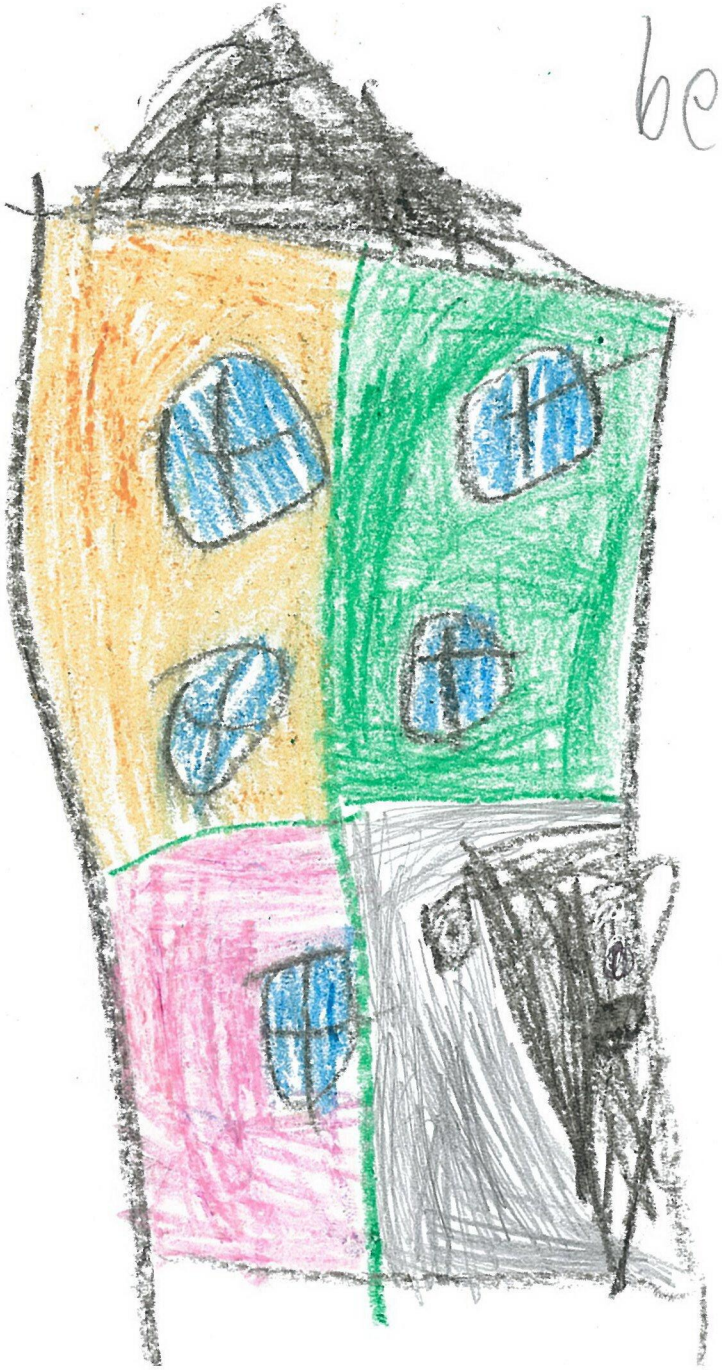
west connex ian in year four [illegible], 9 yrold. West connex is ruining my home. Pleas stop west connex



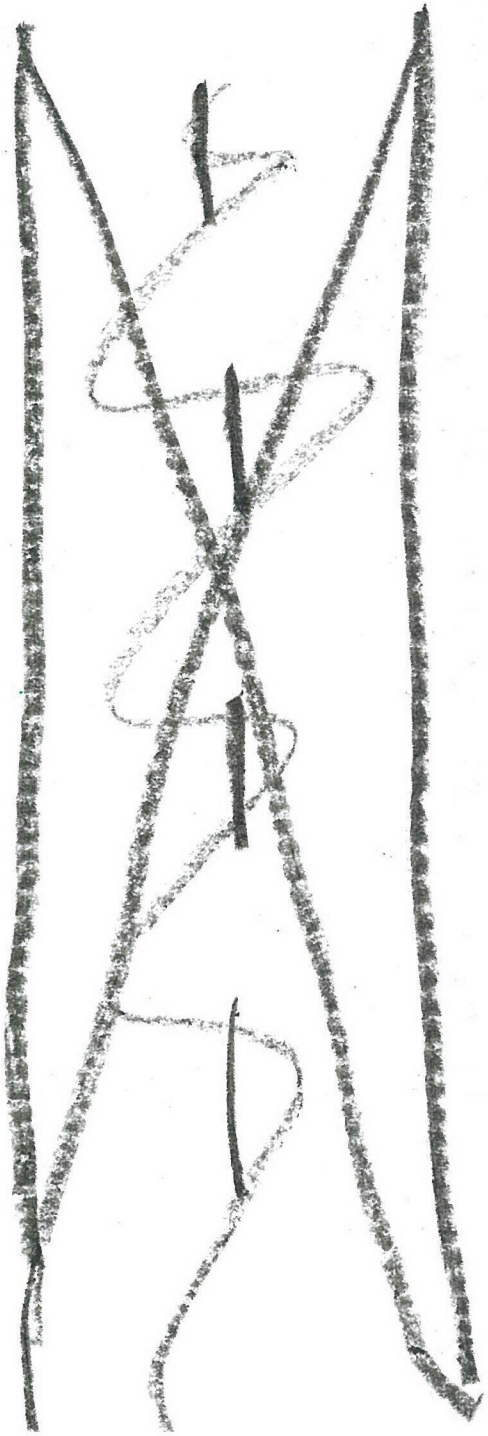


if you stop west connex

I object to westconex



because there
shald be
more homes
then roads.
Adia Age 06



I give permission for my child Julia Lockie - O'Brien to make this submission - Pauline Lockie, parent
4 Brown St St Peters 2044 [redacted] 14_ 6788



12875

Secretary
NSW Department of Planning and Environment
GPO Box 39, Sydney NSW 2001
Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5

I object to the westconnex project because chopping down trees



My first name Mirabella Age 6

Mum or Dad to sign the back of this letter

Name of Parent…Jacqui Pyke……..

Street Address…560 Homer St……...

Suburb…Earlwood……..Postcode…2206…...

Email…jpyke@tpg.com.au……..

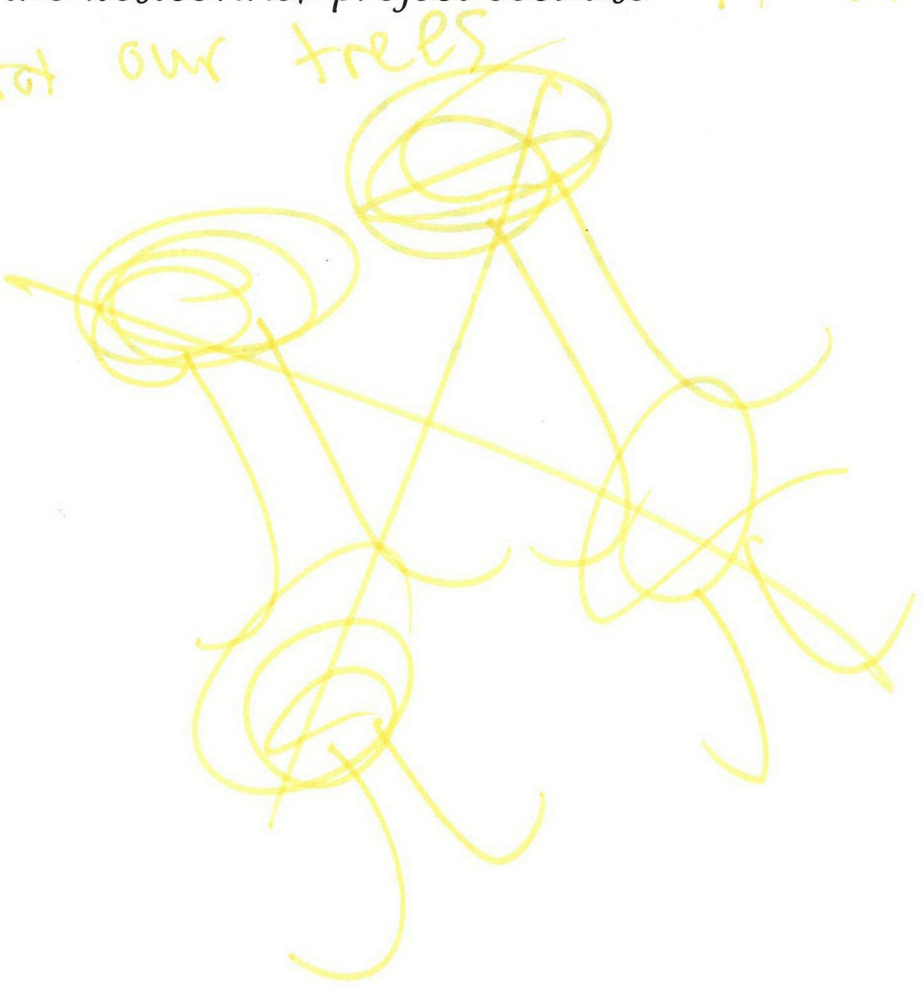
Signature of parent……

Contact details to not be disclosed on submission website Yes / No

12876

Secretary
NSW Department of Planning and Environment
GPO Box 39, Sydney NSW 2001
Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5

I object to the westconnex project because it will destroy our trees



My first name Taj Age 9

Mum or Dad to sign the back of this letter

Name of Parent..Laurent Macé.....

Street Address.....99 Glamis St.....

Suburb.....Kingsgrove.....Postcode..2208.....

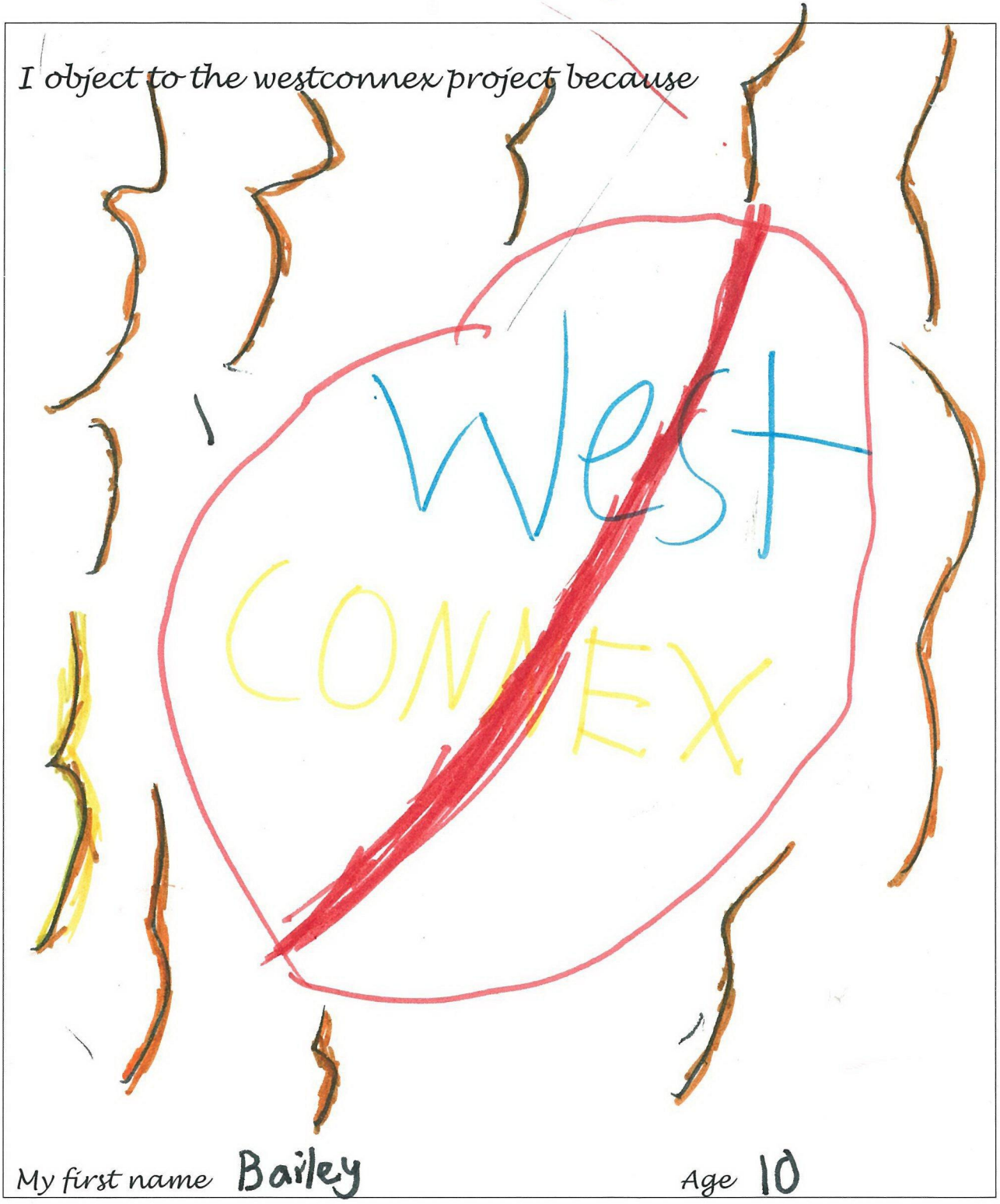
Email...Laurent@quantumFrameless Glass.com.au

Signature of parent.....

Contact details to not be disclosed on submission website ~~Yes~~ / No

12877

Secretary
NSW Department of Planning and Environment
GPO Box 39, Sydney NSW 2001
Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5



Mum or Dad to sign the back of this letter

Name of Parent……Janette Castle……..

[redacted]

Signature of parent……J. Castle……

Contact details to not be disclosed on submission website (Yes) / No

12878

Secretary
NSW Department of Planning and Environment
GPO Box 39, Sydney NSW 2001
Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5

I object to the westconnex project because I like trees.



My first name Madi-Rose. Age 5

Mum or Dad to sign the back of this letter

Name of Parent..Laurent Macé.....

Street Address.....99 Glamis St.....

Suburb.....Kingsgrove.....Postcode.....2208.....

Email.....Laurent@quantumframelessglass.com.a

Signature of parent.....

Contact details to not be disclosed on submission website Yes / No

12879

Secretary
NSW Department of Planning and Environment
GPO Box 39, Sydney NSW 2001
Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5



Mum or Dad to sign the back of this letter

Name of Parent…Masayoshi……..

[redacted]

Email……..

Signature of parent……

Contact details to not be disclosed on submission website Yes / No

12880

Secretary
NSW Department of Planning and Environment
GPO Box 39, Sydney NSW 2001
Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5

I object to the westconnex project because your cuting down all the trees and ther will bene homes for insects.



My first name GUS

Age 7

Mum or Dad to sign the back of this letter

Name of Parent Michael Thompson

[redacted]

Signature of parent M. Thompson

Contact details to not be disclosed on submission website (Yes) / No

12881

Secretary
NSW Department of Planning and Environment
GPO Box 39, Sydney NSW 2001
Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5

I object to the westconnex project because



My first name Takeru Age 3

Mum or Dad to sign the back of this letter

Name of Parent Maga

[redacted]

Email……..

Signature of parent……

Contact details to not be disclosed on submission website Yes / No

12882

Secretary
NSW Department of Planning and Environment
GPO Box 39, Sydney NSW 2001
Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5

I object to the westconnex project because



My first name TAKUMI Age 7

Mum or Dad to sign the back of this letter

Name of Parent..... Masa

[redacted]

Email.....

Signature of parent.....

Contact details to not be disclosed on submission website Yes / No

Secretary
NSW Department of Planning and Environment
GPO Box 39, Sydney NSW 2001
Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5

I object to the westconnex project because

there will be more smelly cars + trucks



My first name Owen [redacted] Age 3

Mum or Dad to sign the back of this letter

Name of Parent Stephanie Heber

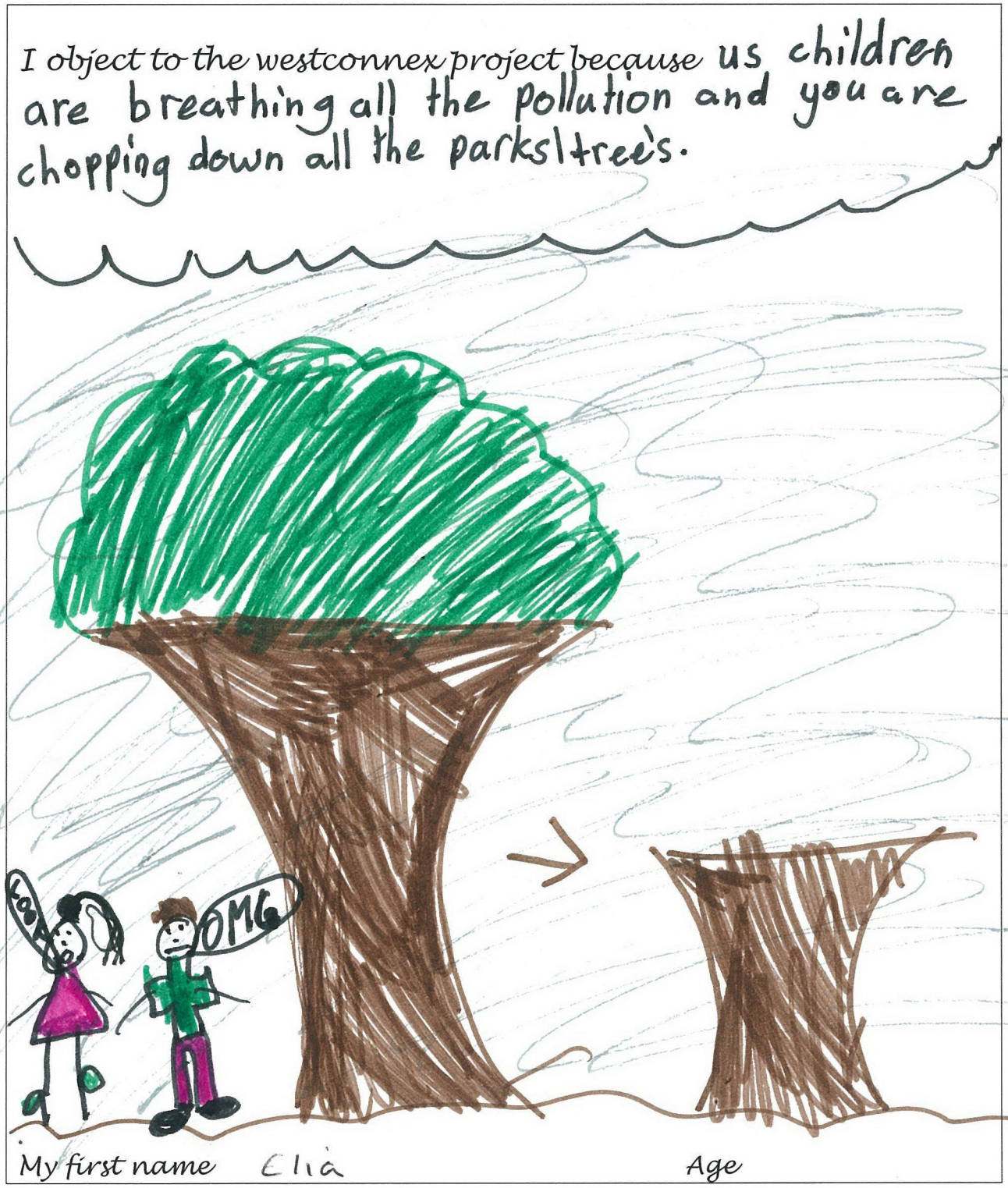
[redacted]

Signature of parent

Contact details to not be disclosed on submission website (Yes) / No

12884

Secretary
NSW Department of Planning and Environment
GPO Box 39, Sydney NSW 2001
Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5



Mum or Dad to sign the back of this letter

Name of Parent Elia

[redacted]

Signature of parent

Contact details to not be disclosed on submission website Yes / No

12885

Secretary
NSW Department of Planning and Environment
GPO Box 39, Sydney NSW 2001
Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5

I object to the westconnex project because



My first name Max [redacted] *Age* 12

Mum or Dad to sign the back of this letter

Name of Parent..... LIZ IRVIN .....

[redacted]

Signature of parent.....

Contact details to not be disclosed on submission website Yes / No



[redacted]

12886

Secretary
NSW Department of Planning and Environment
GPO Box 39, Sydney NSW 2001
Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5

I object to the westconnex project because



My first name Ethan *Age* 6

Mum or Dad to sign the back of this letter

Ethan

Name of Parent……Jacob……..

[redacted]

Signature of parent……

Contact details to not be disclosed on submission website Yes / No

12887

Secretary
NSW Department of Planning and Environment
GPO Box 39, Sydney NSW 2001
Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5



Mum or Dad to sign the back of this letter

Name of Parent..... LIZ IRVIN .....

[redacted]

Signature of parent.....

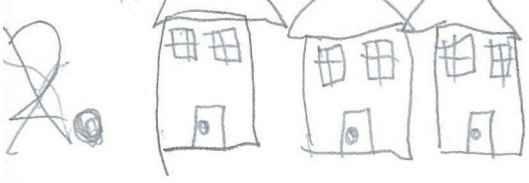
Contact details to not be disclosed on submission website Yes / No

Submission to D and E Project Number SSI 14-6788 WestConnex/New M5

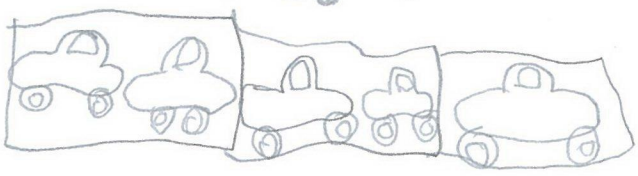
I strongly object to M5 in WestConnex because

12888

1. M5 will take our friends houses and destroy our community in St Peters. They will even turn some of the houses into a parking lot which noone wants or needs.



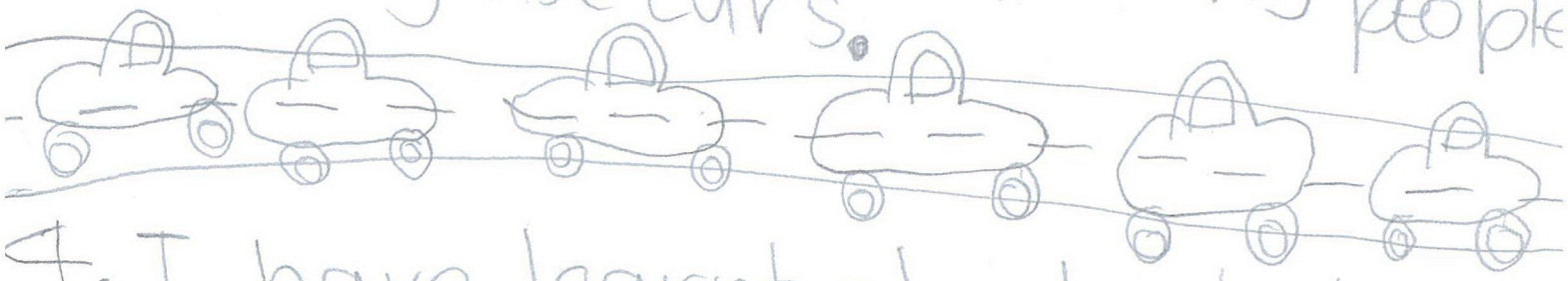
or



2. WestConnex will make unhealthy pollution that is terrible for your kids' lungs and the environment. By doing so WestConnex will make Sydney a less sustainable and envirdmentally freindly place.



3. WestConnex makes bad roads and makes polluting tunnels. What that does is that it attracts cars and cars make more pollution than public transport like buses and trains. Trains need tracks so people can't use them on the M5 road. Buses need bus stops and on the M5 it is just road. That means on the M5 people can only use cars.



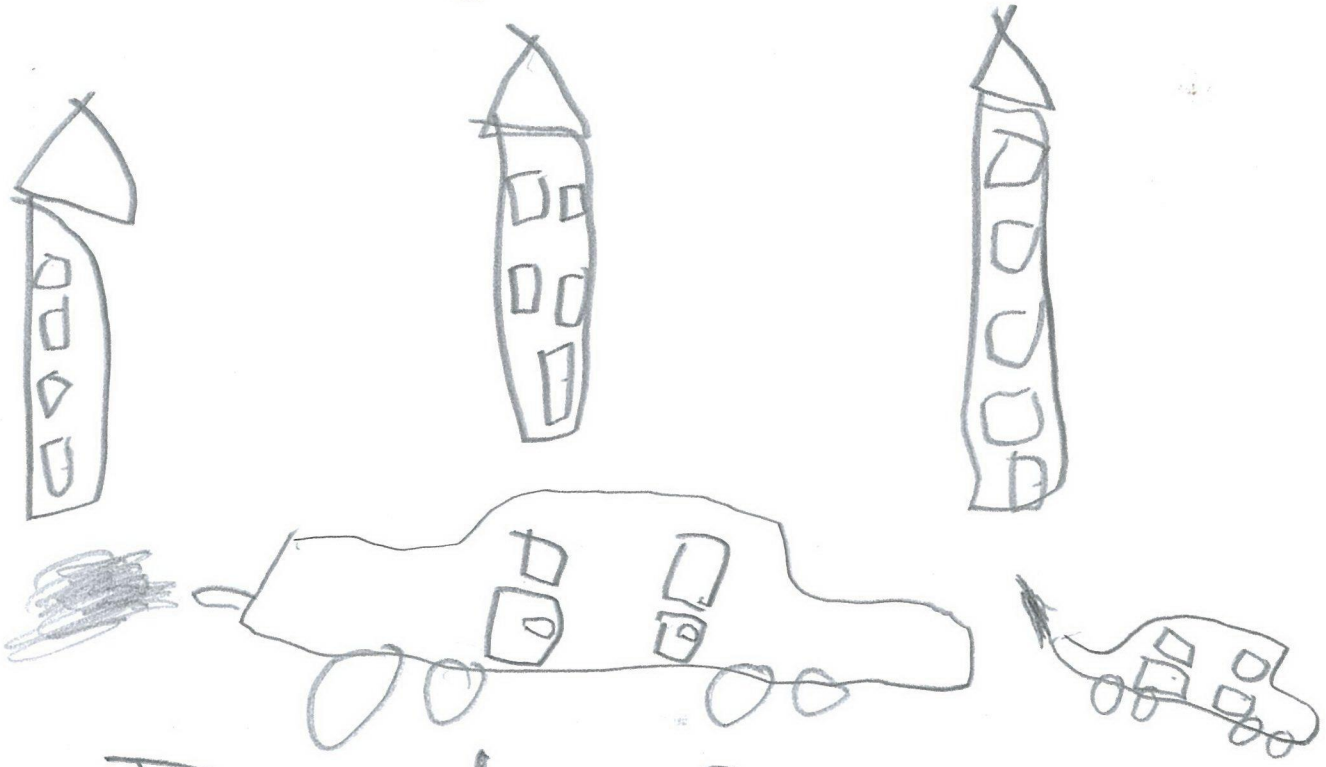
4. I have learnt at school about fossil fuels and sustainability. Fossil fuels are used for petrol and the world is running out. If WestConnex goes on there might be global warming and climate change.



Signed by Maya Ricketson age 9
St Peters 2044
31 Roberts St
29/1/16

12889

Stop west connex!
Leave our homes alone



Julius Thompson
12 Brown Street
St. Peters 2044

The Secretary
NSW Department of Planning and Environment

This picture was taken 4/1/2016

5:22pm

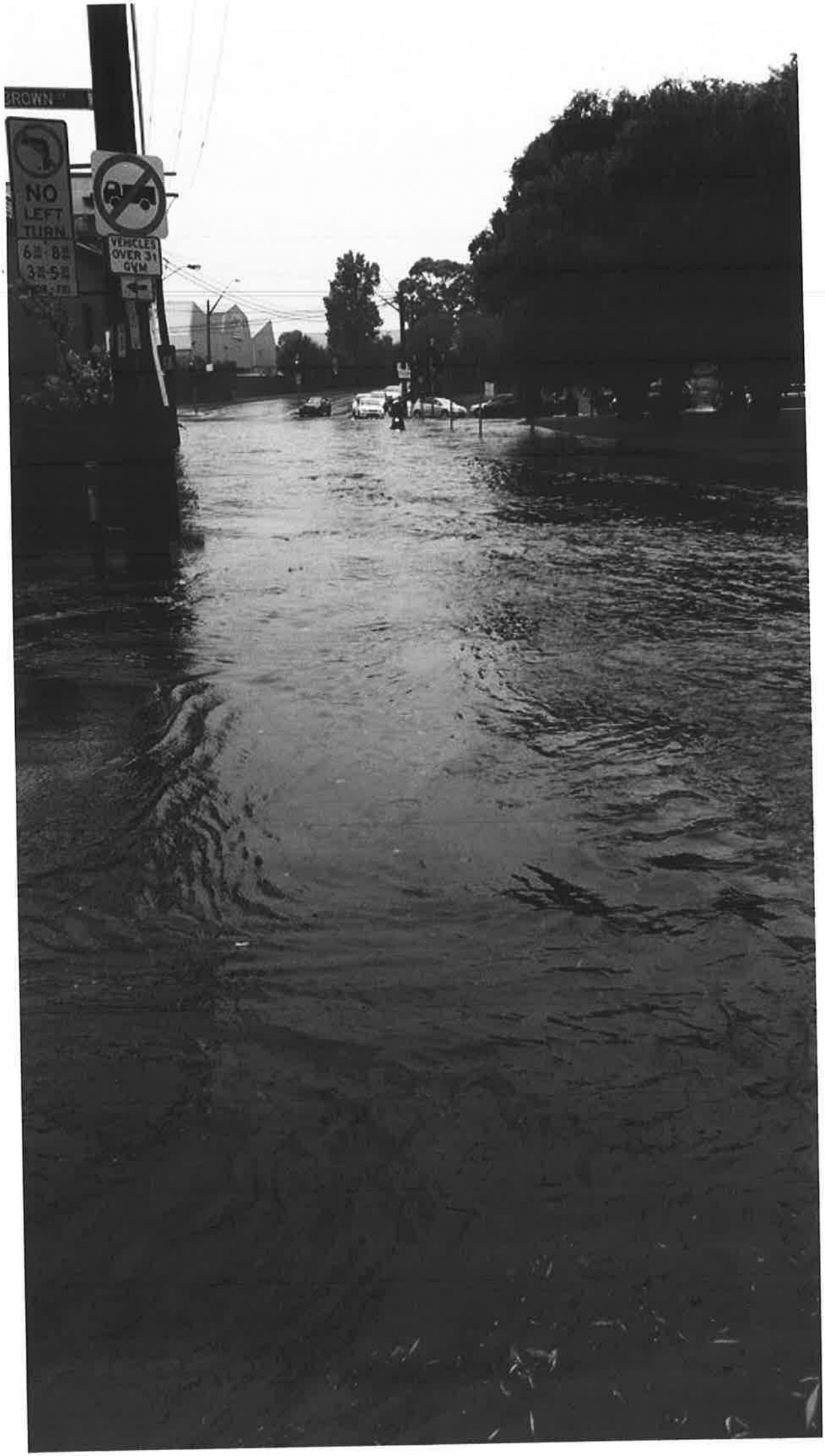
Corner of Brown St and Campbell st
St Peters looking Nth Wst

This is what happens when we get heavy rain - even short showers.

Drainage must be dealt with

Before any work on Campbell St widening begins.

Ngaire Worboys
16 Brown St
St Peters 2044


NO
LEFT
TURN
VEHICLES
OVER 3t
GVM

Joanna Robinski
[redacted]

29.01.2016

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

Attn: Secretary, Department of Planning and Environment

I **object** to the **WestConnex New M5** for the following reasons:

I object to the whole of the WestConnex because arguments to support its construction have not been convincing. The EIS for the New M5 presents as an advertisement for the New M5 rather than a critical examination of the environmental impacts of the project. Parts of the proposed project are described only with subjective, conditional language such as "where feasible", meaning that there are no definitive standards that need to be met.

I object to the WestConnex because building new roads into the city is not an efficient way of moving large amounts of people. A Tangara train carriage can move far more people than the equivalent space filled with cars. The EIS does not contain a comparative analysis for moving people on public transport.

I object to the loss of green recreational space. The loss of green space at Kingsgrove, at Bexley North, at Kogarah Golf Course and in St Peters is unacceptable. These spaces are essential to our wellbeing – we relax by walking in them, having picnics, playing golf, socialising. They reduce the heat build-up in cities by providing shade and improve air quality by removing pollutants. With more people moving into Sydney, we need to provide more green spaces, not nibble away at those we have.

I object to adding large areas of flat grey concrete to the city. Roads are not attractive spaces. No one wants to live or work near a multi lane highway nor do they want to live near unfiltered exhaust stacks.

I object the funnelling of a new road and new cars into the city where infrastructure for their storage does not exist. I also do not want large carparks to be built in our city just to house these vehicles.

I object to the failure of the Sydney Motorway Corporation to disclose contents of the peer review of their traffic model so independent traffic planners can test its results.

I object to the nine, unfiltered, exhaust stacks proposed for Kingsgrove, Arncliffe and St Peters. The densely populated suburbs of Wolli Creek and Arncliffe, already affected by the unfiltered M5 stack at Turrella, will now also be affected by the new stack on the Kogarah Golf Course. The planners of the road admit that any new developments proposed after the stacks are built will need to carefully assess where the exhaust pollutants are going because they do not know. More and more of these pollutants are diesel particles which in 2012, were upgraded by the World Health Organisation to the highest cancer warning level because they are particularly dangerous for the lungs of growing children.

Based on the information available in the New M5 EIS, I urge the Department of Planning and Environment to cancel this road proposal.

Yours faithfully,

Joanna Robinski

Note:
I have not donated more than $1,000 to a political party in the current financial year.
I confirm that my name can be published on the Major Project website where all submissions will published.

Ms C. McNally
Secretary
Department of Planning and Environment
PO Box 39
Sydney NSW 2001

Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5

I write in response to the WestConnex M5 Environmental Impact Statement (EIS).

The process

At the outset, I wish to place on record my objection to the consultation period being held during January when schools are closed, many people are on holidays and many local government workers are also away. The Government, WDA (now Sydney Motorway Corporation) and the Department of Planning surely know this. It is hard to escape the conclusion that it was not a cynical move to display the EIS in this period and despite repeated requests from many members of the public – particularly those most directly affected by the proposed New M5 – you did not extend the EIS submission period beyond 29 January although at least another month to consider the huge number of EIS documents and their complex contents was required.

The New M5 EIS

I **object in the strongest terms** to this project because:

1. Of the unacceptable impact the project's construction will have on local residents, businesses and schools. Across the route of this project, people face years of having their streets turned into car parks for construction workers; at least five days per week (24 hours a day) of construction noise, vibration and heavy truck movements; exposure to asbestos, construction dust, and toxic materials; and diesel pollution from truck movements. Mitigation is recommended in this EIS but no information is provided about who might receive it and what it might be. Instead, decisions are put off until after approval – and in some cases the beginning of construction. This is completely indefensible.

2. The New M5 will dump many thousands of extra cars and trucks in inner western suburbs, many of which will end up on local streets. The WDA itself has admitted that once the New M5 is operational, the local road network will not have the capacity to cope with the extra traffic. Already congested Edgeware Road risks becoming even more congested than currently. People living along that Road and nearby streets already ingest pollution from high traffic volumes. It is unthinkable that they should have to live with even higher traffic impacts and consequent pollution (and hence, negative health effects) from that traffic. I live in Petersham and regularly need to drive along Edgeware Road and surrounding streets. I do not want to be caught in gridlock traffic and know I am contributing to even greater levels traffic pollution than currently.

3. WestConnex has forced hundreds of tenants and owners along the M4 East and M5 corridor out of their homes before this project even has planning approval. The superficial Social Impact study in the EIS makes no serious assessment or costing of the impact of this dislocation. Apparently, ordinary people with no political or wealth connections are not considered in this EIS – perhaps they are "collateral damage"?

4. As I understand it, Euston Road would be expected to handle 60,000 cars or ten times more than it does now. How can this be seriously contemplated? I reject the idea that a busy, polluted road should be brought to within several metres of existing houses.

5. Contributing approximately 30% of total air pollution in cities, traffic-based air pollution is fast becoming the Mesothelioma of the future, and is known to cause non-smoking-related lung cancer, as well as asthma and emphysema. Exhaust emissions and road dust already contribute to particulate matter and are already causing health problems. Why then are you building this extension to cause even more cars to fill the roads and create even greater levels of health-affecting pollution?

6. The New M5 EIS ignores the work of independent traffic and planning experts who have presented evidence-based arguments that WestConnex will not meet time-saving or congestion goals.

7. In a breathtaking instance of conflict of interest, the American-owned company AECOM, which has a poor record of traffic modelling, has been paid $13 million to conduct this EIS. I invite you to challenge me on this figure. Yet AECOM has other contracts that depend on the project going ahead. *How is this blatant conflict of being allowed to happen? Where is the independence in this whole process?*

8. Commuters will pay high tolls only to end in worse traffic jams than ever. No details are provided about future projects such as M4/M5 link that would have further highly destructive, construction impacts on our communities.

9. It is stated within the EIS that the proposed Westconnex New M5 will result in the destruction of 1.4 hectares of Cooks River/Castlereagh Ironbark Forest of the Sydney Basin Bioregion, an ecological community listed as Critically Endangered under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). With approximately 1,000 hectares of this highly geographically restricted community remaining from an original extent of close to 12,500 hectares, this impact represents a significant loss, and is particularly concerning given that the Threatened Species Scientific Committee's Approved Conservation Advice lists ongoing clearing and fragmentation as the primary threat to the survival of the community. In the case of Critically Endangered Ecosystems, such as the habitat the proposed development is set to impact upon, offsetting through the reservation of other sites is highly irresponsible and simply inappropriate and inadequate.

   At a time in human development of increasing loss of biodiversity and its consequences for all human life, I **object** to the probable loss of this vital, endangered ecological community if the New M5 proceeds.

10. I **object** to the loss of 14,000 square metres of Sydney Park. It has taken years to develop sections of the park that will now be destroyed for construction. Further, if the emphasis is on squeezing people into high rise apartments and into areas that have little open space, Sydney Park becomes even more essential as green space in the surrounding suburbs. Why do you think it is acceptable to slice off sections of that park for construction and actual roadway? More traffic and associated pollution will affect the quality of air around and over the park.

Summary/conclusion

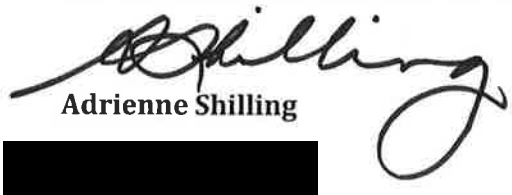
I object not only to the New M5 but to the entire WestConnex project. It is highly misleading that the WestConnex project has been released to the public in sections and that there has not been an EIS released for the entire project. This action is surely aimed at giving the appearance that there will not be massive upheaval, pollution, health problems, loss of amenity and loss of green space in many communities across Sydney.

The currently estimated cost of $16.8 **billion** (but which is still not the final expected cost) invested across NSW would go a very long way towards improving existing regional and city roads, *integrated* public transport, public schools and public hospitals. Spending it on a tollway that so few people would use is both wasteful and deeply unfair.

I reject motorway investment of this scale, in this century of impending huge impacts on our climate due to human impacts. Only rail infrastructure (light, heavy and freight) can keep this city liveable and functional if Sydney and NSW wishes to maintain a 'global' economic status based on population and investment growth. The Government must also enable, as far as possible, active transport especially cycleways and enable walkability wherever possible.

The whole WestCONnex project has been characterised by corrupted processes and a lack of transparency and accountability. This is unacceptable for any project funded by taxpayer money, especially a massive project that would see communities and endangered species destroyed, thousands of people evicted from their family homes and businesses, and billions of dollars of public money diverted from projects that would offer better benefits to NSW.

I request that my *street* address is not published on the Department of Planning – or WestConnex's – website. I further request written acknowledgement of this submission and a clear explanation of the timeline of assessing all submissions to the New M5 EIS, the Department's response to them and the expected time when a formal announcement will be made as to whether the New M5 section of WestConnex might proceed or not. I trust that in relation to recording submissions on the New M5 EIS, the Department of Planning will record ALL submissions received separately not clumped together if people make more than one submission. I further expect that submissions will be referred to on your website by name rather than number, and that navigation around the website will be made far easier than was the case with submissions for the M4East EIS.



Adrienne Shilling

[redacted]

29 January 2016

The Hon Mike Baird MP
Premier of NSW
Minister for Infrastructure

25 January 2016

The Hon Gladys Berejiklian MP
Minister for Transport

The Hon Duncan Gay MP
Minister for Roads and Freight

The Hon Prudence Goward MP
Minister for Planning

The Hon Robert Stokes MP
Minister for the Environment
Assistant Minister for Planning

The Hon Gabrielle Upton MP
Minister for Family and Community Services

The Secretary
Department of Planning & Environment
PO Box 39
Sydney NSW 2001

Dear Ministers and Secretary,

Once again, I wish to register my strong objection to the WestConnex proposal, and to the overall WestConnex project. Since my last letter back in October 2015, further information has come to light that disturbs me even more. Of particular concern is the disparity between the large scope of the proposed project and the much smaller scope of work used to forecast outcomes for the EIS.

I am also very concerned that a thorough and transparent funding schedule is not available to demonstrate how the entire project will be funded to completion.

I believe that WestConnex is deliberately being evasive and deceitful in their reporting of the impact that the WestConnex project will have on the affected neighbourhoods, and its ability to achieve a sustainable solution to Sydney's transport issues. As a result, I expect that you stop the advancement of the project until a transparent, independent and fully accountable assessment of the true impact of the project, both environmentally and financially, can be established.

Yours sincerely



Philip Ritchie
1/10 O'Connell, Street
Newtown NSW 2042, Australia

SUBMISSION REGARDING DEVELOPMENT APPLICATION SSI 14_6788

The Director
Major Planning assessments
Department of Planning and Environment
PO Box 39
Sydney NSW 2001

This submission is my response to the WestConnex M5 Environmental Impact Statement (EIS). To say that I strongly object to the EIS and to the whole WestConnex Project, which it is part of, would be to understate the matter.

It would be more accurate to say that I am made almost incandescent with rage when I contemplate the stupid and inordinate waste of money ($16.8 billion to date, which would be much better spent on public transport) which this State Government seems to be hell bent on foisting upon the people of NSW by way of the sheer bastardry that has become known as WestConnex. Among my reasons for so bitterly and vehemently objecting to this unforgiveable folly, are the following.

1. I object because the EIS has clearly chosen to ignore the work of numerous independent traffic planning experts who have provided evidence based arguments which demonstrate that the grandiose claims made in relation to a finished WestConnex resulting in congestion reduction and time saving for motorists are, simply nonsensical.

2. I object because the proposed profligate spending on WestConnex will deprive badly needed public transport infrastructure of funding for many, many years to come, and it will **not** solve Sydney's traffic congestion problems.

3. I object because the proposed new M5 St Peters Interchange, if built, would divert enormous numbers (many, many thousands) of extra cars and trucks on to the already inadequate streets of the inner Western suburbs. The AECOM traffic modelling (AECOM, incidentally, has a very poor reputation for that sort of work) hardly refers to Edgeware Road, yet it does suggest that traffic on that road will increase significantly when WestConnex stages 2 and 3 are finished. Having spent a not insignificant portion of my life sitting in traffic on Edgeware Road, I am able to advise AECOM that **any** significant increase in the traffic on Edgeware Road will bring Edgeware Road to a standstill. I am also able to advise AECOM that they would have known this had they done a proper traffic study.

4. I object because it is symptomatic of the dismal standards observed during the compilation of the EIS that the EIS does not name Edgeware Road as one of the major approach routes to the Marrickville Metro Shopping Centre. Edgeware Road **is** a major approach route to the Metro Centre. As a resident of Petersham for well over five years, on innumerable occasions in the course of going about my private business I have driven to Metro by way of Edgeware Road, only to find that a significant proportion of the traffic stream I had been part of had also had Metro as its destination. AECOM would also have realised this had they done a proper traffic study.

5. I object because I knew Sydney Park before it was Sydney Park, when it was mostly a rubbish dump, some old brick kilns and the site of the offices and scaffolding stores of Guest, Keane and Nettlefold Pty Ltd. I watched with open-mouthed admiration as – with the wise investment of public funds – it transformed from being an eyesore into a green oasis of open space used for public recreation by the people of Sydney. Now, in 2016, WestConnex in the opaque, malevolent and apparently unaccountable-to-the-public guise of the Sydney Motorway Corporation (SMC) proposes to trash that oasis and turn a significant part of it into a construction site. Such arrant vandalism would be completely unacceptable to me, and in my opinion would never be forgotten or forgiven by, the people of Sydney.

6. I object because as I perceive matters, SMC consultations with the local communities that would be directly affected by these proposed depredations has been conspicuous mostly by its absence, and consultations with the business owners of King Street Newtown, Enmore and Erskineville have been non-existent. This SMC approach to consultation puts me in mind of the general principles that Stalin used in his approach to dealing with the kulaks in the Soviet Union in the early 1930s. While it worked for Stalin, Mr Baird and the board of the SMC need to be reminded that they are not Stalin, and that NSW in 2016 is not the early Soviet Union.

7. There are a number of other grounds upon which I strongly and bitterly object to the travesty which has been published masquerading as an EIS. However, because of the deliberate and cynical timing of the public exposure of this travesty (while significant proportions of the population are still on Christmas holidays) and the fact that I have a life to live and therefore cannot now devote more time to the criticism of this sorry abortion which is known as WestConnex, I am forced to call a halt here.

8. I want it drawn to the attention of Mr Baird and the NSW State Government, and to the board of the SMC, that large proportions of the NSW electorate have noticed that the whole of the WestConnex enterprise reeks of hubris to the point that it is almost palpable, and that hubris is very often closely followed by Nemesis. In the case of WestConnex and Mr Baird, Nemesis will very likely be personified by the electorate of NSW throwing him and his cronies from office.

As an Australian citizen, a resident of Petersham NSW, and a taxpayer, I demand that my objections be properly considered. I consent to this my submission and to my name being published on the Department of Planning Website. I demand that I receive a direct written response to this my submission. I have not ever given as much as $1000 in donations in total to any political party at any time.

NAME: **John N D Clark**

[redacted]

SIGNED:

DATED: 29 January 2016

Leiah Woolstone
[redacted]
Alexandria 2015
[redacted]

12895

OBJECTION TO WESTCONNEX FROM ALEXANDRIA RESIDENT:

I strongly object to the construction of Westconnex - New M5.

THE WHOLE PROPOSAL IS ALL ABOUT 'proposed REVENUE' rather than guaranteed benefit.

- There is a far greater risk to the people in the area affected by increased poor air quality from polution, and endless ongoing terminal health affects as a result, plus property devaluation.

'WESTCONNEX' IS '**WASTE**CONNEX'

THERE IS NO EVIDENCE that WestConnex will provide a solution - as the documentation has enormous loop holes, miscontrued and misleading information.

PUBLIC TRANSPORT ALTERNATIVES should be strongly supported instead of the build of WestConnex:

This is a far better spend of tax payer money with a guaranteed use

- reduced carbon footprint = better for the environment / greenhouse gases

- no impact on air quality or destroyed health, loss of business and homes, devaluation of peoples hard work invested properties

- money saved better used to improve other roads badly needing funds for better signage, lighting etc which government are saying they currently dont have the $$$ for - example Appin Road in Appin.

- Isnt it more important to be able to save lives (mothers, fathers, brothers, sisters etc) being lost on a daily basis on many current roads - lives otherwise could be saved if government properly spend money required to fix these deathtrap roads - saying they dont have the $$$ where they actually do if stupid projects such as WestConnex that does not have community support and will result in ZERO return - where the $$$ are better spent on public transport - making this far more efficient and the upgrade to many deathtrap roads which need the funding.

- This project screams 'capitalist money hungry polititians' AND no care at all to the people in the Alexandria/Inner East area - as the development is not in the politians back yard - if it was, it would not be on the table for consideration.

*** FEDERAL FUNDING NEEDS TO BE HALTED ***

*** IMPROVED PUBLIC TRANSPORT NEEDS TO BE INJECTED - TAX PAYER DOLLARS FAR BETTER SPENT IN THIS AREA WHERE MORE PEOPLE ARE TRANSPORTED IN SINGLE TRIPS RATHER THAN BY MULTIPLIED SINGLE VEHICLES ***

There is nothing in any of the data that could be deemed a benefit by any right minded individual or group of people other than capitalist governments on a white elephant money hungry 'SCHEME' rather than taking into account the long term DETRIMENT and NEGATIVE IMPACT it will have on the area introduced.

This is yet another strong example that the **government are NOT LISTENING TO THE PEOPLE.**

GOVERNMENT NEED TO LISTEN TO THE PEOPLE (beyond the polls ane elections)

THERE IS ENORMOUS AMOUNT OF MISLEADING INFORMATION IN THE DOCUMENTATION - this alone smells a rat.

- Why is there so much misleading information ?
- Why is the bad rat being covered up ?
- Why is there NO true transparency of the REAL FACTS ?

Because the goverment sector pushing for this are more concerned about dollars, and NOT the people being impacted and the long term affect - because its not in their backyard / on their streets destroying their lives. If it were, this project would not even be on the table !!

If built, WestConnex do not plan to allow right hand turns from Euston Road into Sydney Park Road, except for buses.

- therefore, the diagrams showing two right hand turn lanes ARE WRONG AND MISLEADING !!!

– there will only be one right hand turn lane, and it will be buses only.

- this will divert traffic to aerterial roads, including Mitchell Road.

- Mitchell Road is equally conjested NOW as what Euston Rd currently is - 7 days per week - all day !

- All roads/streets surrounding Euston Rd are heavily residentally populated

THERE NEEDS TO BE AN AUDIT OF THE REPORT AS THE DETAILS AND NUMBERS DO NOT ADD UP

Less people will use the M5 after WestConnex than use it now - people won't pay the toll !!!
- the toll charge wont cover the costs and balance will be forced to be covered by tax payers. ANOTHER HIKE IN TAX DOLLARS for something already known to be a white elephant, waste of tax payer money.
- M5 users will be charged tolls - no mention of how much yet !

- THE CONSTRCUTION OF WESTCONNEX WILL END UP A WHITE ELEPHANT, MORE TAX PAYER MONEY COMPLETELY AND UTTERLY WASTED.

- What will the government do then to recoup the funds they will lose.

- The development is not even fully funded ! - what then - left with an enormous hole in the ground .... TYPICAL.

FACTS:

- CURRENTLY - NOW: the **DAILY** Traffic on Euston Rd is 6,000 - 7,000 vehicles - ***** DAILY *****

WestConnex will increase this by 1000%

- How can any right minded group of people think this is acceptable, and manageable ? - THEY KNOW IT IS NOT MANAGEABLE OR ACCEPTABLE, AND JUST DONT CARE BECAUSE ITS NOT IN THEIR BACK YARD/WHERE THEY LIVE !!!!

- **Westconnex will increase this volume to a DAILY traffic volume of between 61,000 to 71,000 vehicles = an increase of over 900%** (call it 1000% increase of influx to this area)

- This is more traffic than uses Victoria Road. It is almost ten times the traffic that Euston Road currently handles."

** if Westconnex is NOT BUILT - by 2021 its porposed the increase from the current 6,000 - 7,000 daily will become approx 11,500 daily.

- Euston Road is the VOMIT END of the Tunnel (both at entry and exit).

- the area is already severley conjested on a daily basis. With conjestion on Euston Rd the cars divert off on the small arterial streets - such as Fountain Street and eqaually Mitchell Road. All roads in the area around Euston Rd will be affected as cars will need to veer off due to the stand still conjestion that will be created from the WestConnex construction - such as Buckland Street, Wyndam Street, Henderson Rd, Botany Rd.

- From about 2019, the M5 will terminate at Sydney Park. When complete, it will dump over 100,000 cars into our suburbs, much of which will end up on local streets. This is not by accident – it is intentional.

- Before Westconnex is developed the area already has new developments going up - which will increase traffic flow in the area.

this has not even been considered and this is happening now - not in several years time:

- Old 'Alexandria Hotel' : a block of 28 residential apartments
- Green Square : 61,000 residents, plus traffic in and out throughout the day with visitors to libraries, community centres, shops etc.
- there is another apartment development on Regent Street opposite IGA Supermarket = more people in the area = cars on the roads in this area
- Aust Technology Park redevelopment = with retial shops, community and child care facilities, gym, additional offices, etc - there will be increased traffic to this area, travelling up Mitchell Rd to enter the sites main entry point.
- Redevelopment of 16-26 Mitchell Rd - 30 apartments
- Waterloo Estate on corner McEvoy/Bourke St
- another Waterloo development on corner McEvoy and Elizabeth Street
- Proposed Waterloo station to be developed to service the influx of more workers in the area
- and other various developments in construction in the Alexandria / Inner East area - before any WestConnex construction and massive intrusion of extra conjecstion.

ENVIRONMENT

- the government networks are happy to destroy what ever trees and houses are in their way, however when the councils and governments plant unsuitable trees in residential streets which cause structural damage to our homes- as soon as you mention trees to council - they have ear muffs on and dont want to know - all trees in their eyes are protected, but not when it comes to white elephant waste of tax payer funds in dollar pits created by government.

- Euston Rd will be widened by 12 meters (current 4 lanes will become 8 lanes) - EQUALS destruction of homes at one half from Sydney Park Rd end, and loss of business to the other end.

Where are these people suppose to move to ?

Why should they be forced to move for something that will be a completely white elephant, government mistake of the greatest magnitude ?

No care for current businesses - another example of Government greed without thought of bigger impact and loss to people currently in area. The affect on peoples income, lives etc.

- this increase on traffic will have an impact of road quality - the weight on the roads will have an impact everywhere. (this is my observation, was not noted at the meeting).

- 3.5billion $$ taxpayer money - that is going to have an environmental, financial and health impact to everyone in this area.
- possible outcome of 1% of Sydney drivers likely to use the tunnel after its built and they realise the toll cost, conjestiion at Euston Rd both at entry and exit.
The final stage of project is currently not funded. If stage 1 & 2 are profitable it will go ahead.

- The listing of a Plan B - this is another cover up and CON, its the same project with an added road to the Airport. Its a scam.

- more money is being spent on this one road, than per country council spend to fix the current roads !

IMPACT TO RESIDENTS IN THE FULL AREA:

- NOISE AND VIBRATION INTERFERENCE

There are impacts on Alexandria both on the noise and vibration front, but the main impact on us is noise. The EIS generally dismisses vibration as an issue that won't cause us problems. ** ANOTHER LIE ***

Broad impacts:

- the plan is to create the tunnels by blasting rather than by mechanical excavation. The justification appears to be speed and shorter burst impacts on any given area. This is far more risky and will be uncontrolled rather than the many assurances outlined in the documentation about control and precedent.
- the Interchange and surrounding roads program is a 2.75 year construction project.
- Hours of operation: Normal is 7am-6pm; evening is 6pm-10pm; night is 10pm-7am. **However, pretty much anything they like can be done during the evening and night shifts if they deem it safe and/or appropriate to do so**! And noise mitigation measures would be the same, whether day or night.
- each designated Noise Catchment Area only has one data logger. For Alexandria, it was at the edge of Sydney Park between Mitchell and Euston.
- re Project Impact, everywhere where the project impact is more than 2db to noise levels, those areas are consistently characterised as 'Highly Urban', allowing a justifiable higher level of ambient noise. The boundaries between 'Highly Urban' and other are very inconsistent and not generally good. Example at Vol2D, Appendix J, Appendix F – St Peters Interchange Study Area

Specific impacts:

- while the ventilation stacks at Kingsgrove and Arncliffe are to be approx 30 m above ground, the St Peters ventilation stacks will be about 20m above ground 'in line with the Australian Government's Civil Aviation Safety Authority requirements'.
- Traffic figures: Euston Road goes from 11.4k vehicles in 2021 if WC is not built, to 71k vehicles if it is built.
- 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).
- There is no measurement of the impact of construction traffic coming from the north to the St Peter's Interchange site. So, no modelling of the impact on Euston or Mitchell et al. **ANOTHER EXAMPLE OF COVER UP INFORMATION/LACK OF DETAILS FROM GOVERNMENT**
- 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.
- 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.
- everyone will suffer excess noise from kerning and drainage. In Alexandria, the excess above norm will be 43db, 45 receivers will be affected and 13 will be highly noise affected.

- the blasting causes excessive vibration and will have enormous structural impact spread throughout the surrounding area. Any delapidation report will not show full impact of any structural damage immediately, and when/if does appear the government will wipe their hands off it as they will only refer to their immediate delapidation report which is done too soon after construction to protect property owners.

Property values will plumet severley

- **Health issues** from the construction and continued ongoing polution once the excessive increase of traffic comes through the area: cardiovascular, lung capacity, reduced air quality, sleep deprivation (for everyone) as the traffic will be 24/7.

- What compensation to the ongoing health issues the build of the WestConnex will impact will the Government provide ? - the answers is NONE, as the Government each year cut healthcare costs !

Ventilation stack DO NOT WORK !

- the current M5 is a prime example.
- does not ventilate outside the tunnel, and does not adequately ventilate inside the tunnel (the ventilation units dont perform as they should - its a smoke screen to list them).
- **M5 tunnel has the worst air quality** - the ventilation systems dont work, and there is always a break down in this tunnel causing more delays on the link via this freeway. Its a disaster !

PUBLIC TRANSPORT ALTERNATIVES should be strongly supported instead of the build of WestConnex:

This is a far better spend of tax payer money with a guaranteed use

- a few strategic rail and light rail projects worth a fraction of the cost of WestConnex would significantly reduce road traffic in the east-west axis by meeting demand for public transport, particularly in the peaks.

- buy back the Airport link - Mascot and Domestic stations - people use these
- open up and include metro suburbs on the underground rail lines
- light rail

[redacted]

From: Paul Christian [redacted]
Sent: Wednesday, 18 November 2015 4:00 PM
To: Stokes_Office_Email
Subject: HPRM: Westconnex into Alexandria

Hello Mr Stokes

I am a resident of Alexandria and I am writing to express my disapproval in the strongest possible way to your proposal to bring Westconnex into Alexandria via the St Peters Interchange.

I have a property at 93 – 103 Euston Road and I was astonished to find that Westconnex plan to widen Euston Road to seven lanes at the intersection of Sydney Park Road, with an extra lane north (towards Botany Road) at that intersection, narrowing to two lanes (heading north) at the intersection of Euston Road and Maddox Street.

There are several major problems with this proposal. Firstly, it will impact greatly on the residents in the buildings at 125 Euston Road and 93 – 103 Euston Road. The residents at 125 Euston Road will literally have 7 lanes of traffic at their front door, with virtually no 'buffer' zone between the widened road and their front door. How are people able to live a relatively normal existence with this amount of traffic (and associated noise and pollution) at their front door and outside their windows? The same applies to the residents at 93 – 103 Euston Road, with many of those apartments having bedrooms windows facing directly onto Euston Road. And of course there are also the apartment buildings that are on the stretch of Euston Road between Maddox Street and Harley Street. These residents too will also be subject to increased traffic and associated noise. In anybody's language, it is not reasonable to have traffic right up to the front door of a building that was not designed and built to cope with this volume of traffic and this level of noise. If these buildings along Euston Road were all double brick and built with double glazed windows and appropriate sound insulation then maybe traffic of this volume could be tolerated by the residents in these buildings if there was a five metre buffer zone between the traffic and their front door. But these building were NOT designed, nor built with the idea that very high volumes of traffic could be coming past the front door 24 hours a day, 7 days a week and nor is there proposed suitable distance/buffer between the building and the road/traffic. How is it safe, or even legal to propose traffic so close to a residential building. What happens if there are vehicle collisions at this intersection, as there almost certainly be at some point? Where is the safety margin between the traffic and the front doors of this building?

And in addition to this, the extra traffic that is proposed will increase pollution levels substantially along Euston Road - both noise pollution and exhaust pollution and this poses a danger to residents, because the current proposal has some residents living too close to the road which will carry high volume of traffic and massively increased levels of exhaust emmisions.

The second point to make in regards to the widening of Euston Road, is how will the suburb of Alexandria (and the suburbs that Alexandria feeds into) cope with all this extra traffic? How is the current proposal to

widen Euston Road, then just 'dump' all this extra traffic at the edge of Alexandria (which is already a heavily congested area) a viable option? Alexandria has experienced massive population and traffic growth in the last decade and at various parts of the day Euston Road, McEvoy Street, Huntley Street, Mitchell Road, Botany Road, Bourke Road, Collins Street, Maddox Street, Fountain Street, Henderson Road, O'Riordan Street and Wyndham Streets all experience very high volumes of slow moving traffic and at various stages of the day this becomes complete gridlock. Of most notable concern is the intersection of McEvoy Street and Botany Road, which is already over congested at peak times and for a large part of Saturday. With all the additional traffic coming from the St Peters interchange, into the proposed widened Euston Road, this traffic congestion will increase remarkably. Yes, remarkably and this would not just affect Euston Road and McEvoy Street, but all those other streets and intersections I've mentioned here, that already experience gridlock. You cannot just propose a traffic 'solution' that just dumps all this traffic at the periphery of Alexandria and not expect this extra traffic to yield disastrous consequences for traffic flow in the entire suburb of Alexandria.

Most residents who live in inner-city suburbs realise that traffic noise is a given and that is part of inner city living, but to have seven lanes of traffic encroaching on a city fringe suburb like Alexandria is just very poor planning and exhibits little or no regard for the area and those who live there. Westconnex's proposal to widen Euston Road to seven lanes is an absolutely disastrous notion and residents of Alexandria wil not wear this at all and the very least we would expect is some sort of community consultation with this project and to also truly take into account how Westconnex will change the lives of Alexandria residents for the worse and will also change the very unique suburb of Alexandria for the worse and forever.

Please see the photo of the proposed widening of Euston Road at the intersection of Euston Road and Sydney Park Road and how unacceptably close Euston Road would come to those buildings.

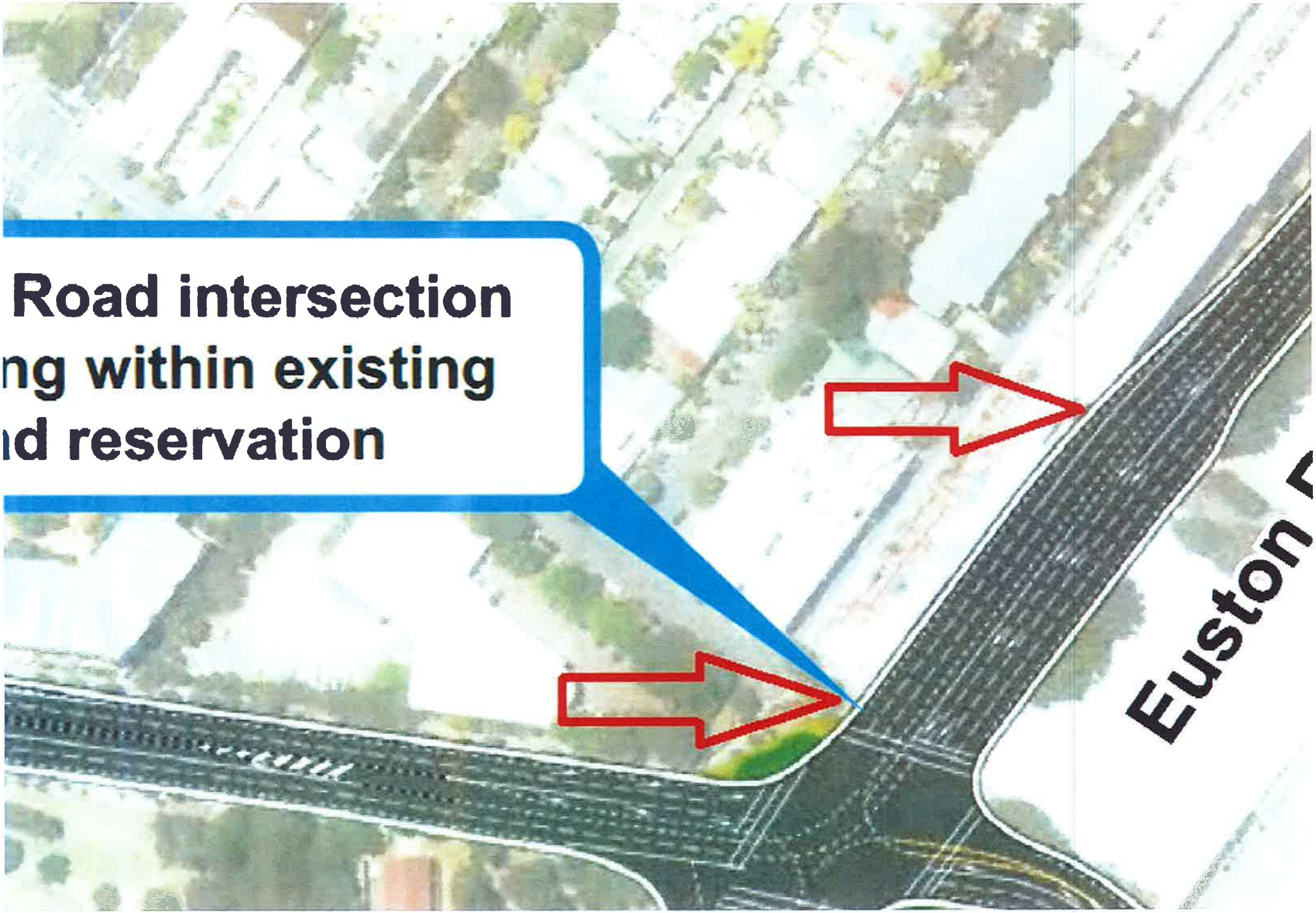
I look forward to your response and also the opportunity for residents of Alexandria to debate the Westconnex disaster with you at a community forum at some stage in the future.

Thank you.

Paul Christian

Alexandria resident

[redacted]


Road intersection
ng within existing
d reservation
Euston

RECEIVED
13 JAN 2016

Secretary
NSW Department of Planning and Environment
GPO Box 39, Sydney NSW 2001
Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5

I make this submission in relation to the Environmental Impact Statement (EIS) for the WestConnex New M5 project. I strongly object to this project and to the entire WestConnex of which this is a part. In particular, I strongly object to:

- The NSW Government's failure to publish a full and transparent business case for the $16.8 billion WestConnex tollway even though taxpayers carry the financial risk. The public deserves to know the full costs and toll revenues for this project.
- The EIS's claim that greenhouse gas emissions will fall even though the number of vehicle kilometres travelled (VKT) by cars is set to increase dramatically.
- The destruction of parks, trees and green spaces to make way for this toll road, including critically endangered remnant bush at Beverly Hills.
- A transport solution that includes unfiltered exhaust stacks located so close to schools such as McCallum's Hill Primary, Arncliffe Primary and Haberfield Primary
- The threat WestConnex poses to the endangered species such as the Green and Golden Bell Frogs at Arncliffe, which are unlikely to survive being so close to the pollution stack and portal planned for their Kogarah Golf Club habitat.
- The enormous amounts of extra traffic that will be induced and dumped by WestConnex into suburbs across inner, western and south-west Sydney.
- The impact this extra traffic will have on our key roads, such as Canterbury Rd, Stoney Creek Rd, King Georges Rd, Liverpool Rd, Moorefields Rd and Forest Rd.
- The superficial analysis of alternatives to WestConnex, which fails to properly consider how more sustainable transport options could be a better use of this toll road project's estimated $16.8 billion cost.
- This EIS using the positive impact of the entire WestConnex to justify the New M5 even as it fails to consider the negative impacts of the same.

I ask you to acknowledge my submission and respond to each of my concerns.

Name: Bernadette Radburn

Email: bernadetteradburn@yahoo.com

Address: 7/49 Alt Street

Suburb: Ashfield. Postcode: 2131

Signature:

RECEIVED
13 JAN 2016
SECRETARY

Secretary
NSW Department of Planning and Environment
GPO Box 39, Sydney NSW 2001
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I ask you to acknowledge my submission and respond to each of my concerns.

Name: Molly Rea

Email: molly.rea@hotmail.com

Address: 8 Gower Street

Suburb: Hurlstone Park Postcode: 2193

Signature:

Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5

RECEIVED
13 JAN 2016
SECRETARY

The Secretary
NSW Department of Planning and Environment
GPO Box 39, Sydney NSW 2001

I make this submission in relation to the Environmental Impact Statement (EIS) for the WestConnex New M5 project. I strongly object to this project and the entire WestConnex of which this is a part. In particular, I strongly object to:

- A lack of transparency and accountability in this massive tollway project for which the cost is currently escalating at the rate of $2 billion a year.
- Billions of dollars of construction contracts being let before this EIS was even lodged.
- A failure to consider negative impacts of the whole project including costs to human health and biodiversity while relying on unproven unplanned positive benefits for the whole project.
- The enormous amounts of extra traffic that will be dumped by WestConnex into suburbs across inner, western and south-western Sydney. Even the Westconnex's own EIS shows that the project will increase traffic on local roads as people avoid expensive tolls.
- AECOM being paid $13 million of public money to do this EIS when it has a poor history of traffic modelling and a strong conflict of interest due to its commercial interests in the project.
- The negative impact extra traffic will have on the thriving retail precinct of Newtown including King Street, leaving it open to be declared a clearway, and on the quality of life of residents living in or close to local roads such as Edgeware and Euston and Campbell.
- An inadequate air quality study that has similar flaws to the M4 EIS study that has already been criticised by the NSW EPA and Health Department; and the plan to build unfiltered ventilation stacks. Dangerous air pollution increases risks of cancer and respiratory illness.
- Westconnex's failure to assess correctly and handle responsibly the asbestos that is already impacting on communities in St Peters, Granville and Erskine Park. On this record, its contamination analysis and proposals for the New M5 should not be accepted at face value.
- A failure to consult genuinely with the community, including a complete failure to consult with businesses in Newtown, St Peters, Enmore and Alexandria.
- A failure seriously to analyse alternatives to WestConnex in this EIS, including public transport and other options that would be a better use of $16.8 billion.
- A failure to seriously consider the long term impact of Westconnex on carbon emissions.
- Destruction of scores of hectares of parks, trees, gardens and other green spaces across the entire Westconnex project, including critically endangered fragments of bush near Wolli Creek valley.
- Years of construction impacts including dust and noise on communities including schools.
- The wholesale destruction of valued heritage building and precincts.
- The inadequate and unprofessional analysis of the threat posed by the New M5 to the endangered Green and Golden Bell Frogs at Kogarah Golf Club, which are unlikely to survive the tollway's construction and operation.
- The arrogant EIS social impact study which dismisses the impact of forcing hundreds of people from their homes and businesses on communities in a few lines. This study should be immediately rejected by the Department of Planning as failing to meet basic requirements.
- Residents affected by compulsory acquisitions being offered below-market prices for their homes and businesses, and the distress and trauma this has already caused to many people.
- The monstrous St Peters Interchange from will slice off section of valuable parkland and pour traffic onto roads surrounding Sydney Park, a key regional park for Inner West residents.

I expect you to publish this submission alongside my name and suburb in accordance with the undertaking published on the Planning Department website

Name: MARINA DE GABRIELE [redacted]

[redacted]

Suburb: ALEXANDRIA NSW Postcode: 2015

The Hon. Rob Stokes, MP
GPO Box 5341
SYDNEY NSW 2001

11 Henry St
Five Dock
NSW 2046

Dear Minister

Re: Approval for WestConnex tunnel

I am writing to urge you NOT to provide planning approval for the proposed WestConnex tunnel.

Having been to a number of consultation forums held by the RMS and WestConnex Delivery Authority, attended meetings and looked through the different volumes of the EIS documents, I have a number of grave concerns about this proposed tunnel. These have been further confirmed and further strengthened in recent weeks:

- The business case is still unconvincing, especially when the report was published so late in the piece. There is still no completed design or rationale for the entire WestConnex project – its links to Sydney Airport and Port Botany. There are no plans for financing Stage 3, yet the viability of stage 1 is predicated on stage 2 etc.
- The cost is prohibitive for the supposed benefits, and has just increased by another billion, partly due to fast tracking apparently.
- The traffic forecasts are highly questionable, as noted in the BITRE Literature Review Traffic Forecasts. We have seen how wrong previous forecasts were for the M5East, Lane Cove and Cross City tunnel, and paid for the over and under estimates in more ways than one.
- Most of all, I could see no proper assessment of health impacts. Only last week, the Australian Institute of Health and Welfare reported that air pollution results in 3000 premature deaths each year in Australia, not to mention adverse health impacts like asthma. It is widely acknowledged, as this report did, that the regulation of air quality in Australia is lagging years behind the science and other countries' regulations. Yet, the approval process relies on these outdated measures to justify a project that is bound to result in adverse health impacts.
- While there are plenty of measures of the amount of time that Joe Bloggs from Castle Hill will save driving to the airport or Botany, where is there ANY assessment of the cumulative effect of drivers using these tunnels on the same journey or for regular drivers such as truckies and couriers?
- The assertion that fumes from the tunnels would only add a small amount to the ambient air, and therefore can just be jet blasted after having been collected is truly bizarre. As is the plan to have two stacks in Ashfield to exhaust fumes from two tunnels.
- Similarly, the assertion that filtration does not work, or is not cost effective just does not stack up. Even with all the problems associated with the retrofitting of a filtration trial in the M5 East, it was shown that it is effective, when it is properly operated. How is it that other countries, with the latest being Hong Kong's Central Wanchai-Bypass, are able to happily adopt state-of-the-art air purification systems for both particles and nitrogen dioxide, and yet, we in NSW, decide that it is not viable, when the constructors (Leighton-Dragados-Samsung Joint Venture) are the same?!

There are many other points of which I'm sure you are more than aware to do with the destruction of heritage suburbs such as Haberfield and conversion of much needed green space into roadways.

Could you please not approve this project, which has been fundamentally flawed from the start? No number of 'stringent conditions' will make up for the fact that it was deemed a fait accompli before proper assessment of impacts or a cost benefit analysis. Can your government please put a stop to sending more good money after bad, and restore some faith in due process?

I am both a driver and a public transport user, and frustrated by traffic jams just like everyone else. We need to be able to move across this city. However, the WestConnex cure will be worse than the current congestion disease and there are many better, more cost effective solutions.

Thank you for reading my letter.

I look forward to your response,



Yours sincerely,

Giselle Mawer