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Content:
IRRESPONSIBLE ACTIONS AND ENVIRONMENT DESTRUCTION

Plans to widen Euston Rd to take increases of up to 60,000 vehicles, which will bring this traffic close to windows of homes, destroy 100s of trees and so reduce the capacity of Sydney Park to mitigate the heat, noise and pollution of the massive increase in traffic, reducing the quality of life of the neighbourhood.
Just many more reasons to strongly object to the westconnex

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Content:
UNFILTERED EMISSIONS STACKS- BAD FOR OUR HEALTH

Plans for unfiltered ventilation stacks, located close to residences and parks which do not meet best international practice. I am aware that there are experts who believe the stacks should be filtered. I do not accept that emissions from stacks are negligible and am as concerned about the impact on residents in South West Sydney as I am in Tempe.

Just many more reasons to object to the westconnex

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Content:
THE GOVERNMENT COULDN'T CARE LESS ABOUT OUR HEALTH
The proposal to operate excavation and construction 24 hours a day so St Peters will have to put up with 5000+ vehicle (2000 heavy vehicle) movements a day for the duration of the project. Exposure of residents including children at St Peters School and the child care centres to diesel fumes day and night when diesel exhaust is classified as a carcinogenic pollutant is an outrage. This EIS admits that dangerous dust pollution will be created during construction at St Peters. It proposes to water the site to avoid this. The community can not accept this when the proponent itself (via its contractors) has failed to water the site during current asbestos removal, and has also failed to ensure this waste has been watered down at its destination sites in western Sydney. SMC and previously WDA did not respond respectively of properly to residents concerns about illegal removal of asbestos from former dial a dump site. It has been recently revealed that the costs "clear up" of this site has been over budget again costing the tax payer even more money.
Just many more reasons to object to the westconnex

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Name: Mark Curran
Organisation: RAPS (Residents Against Polluting Stacks) (President)
Govt. Agency: No
[redacted]

Address:
[redacted]

Earlwood, NSW
2206

Content:
I wish to make a submission in relation to the proposed 'new' M5 tunnel in relation to in-tunnel air quality issues

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Submission to the NSW Department of Environment and Planning in relation to the 'New M5' Environmental Impact Statement on behalf of the RAPS organisation.

Mark Curran, President RAPS (Residents Against Polluting Stacks)

Phone 02 95588863, [redacted]

[redacted]

RAPS (Residents Against Polluting Stacks Inc.) was founded in 1997, following and in response to the changes announced to the plans for the M5 East motorway and tunnel which removed the three ventilation stacks located on the hills above the proposed tunnel and replaced them with a single ventilation stack in the valley near Turrella railway station.

Then and now, the objectives of this organization are:

(a) To seek the installation and operation of air pollution treatment systems in the M5 East and other tunnels, and any other effective methods of reducing the impact of air pollution and stacks on the local area

(b) To seek fair and equitable infrastructure planning and pollution assessment processes and regulations.

(c) To support ecological sustainability in all projects affecting the local area.

(d) To share information, and offer advice and assistance to individuals and groups with similar objectives.

(e) To disseminate information to the public on issues related to urban air pollution and planning.

My experience over some 16 years of involvement with tunnel issues includes:

- Membership of the M5East Consultative Committee on Air Quality from mid 1999 until 2007-8
- The 3 parliamentary inquiries into the M5East ventilation system.
- The parliamentary inquiry into the Lane Cove Tunnel
- The parliamentary inquiry 'Health impacts of air pollution in the Sydney basin'.
- Taking part in the 'International Workshop on Tunnel Ventilation 2000"
- Member of the consultative group for the NHMRC report "Systematic Literature Review to Address Air Quality in and Around Traffic Tunnels. 2008"
- Submissions to the Senate inquiry 'Impacts on health of air quality in Australia. 2013'
- Extensive involvement in consultation with the RTA on issues directly relating to the M5East ventilation system, the ill effects experienced by users and the planning of the 'Filtration Trial'.
- Extensive involvement in the health studies carried out into residents' health and the possibility of a cancer cluster around the M5East stack
- In addition, I can claim to be one of the few people in Australia who has actually visited and inspected a modern tunnel filtration system in operation (Madrid. Jan 2008)

A personal note.

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 modelling suggested there would be low but acceptable impacts of less than 0.5µg/m^3 PM10.

Comments and observations on air quality section of the EIS document for the proposed 'WestConnex New M5'

Introduction.

It is probably understandable that the initial reaction of a member of the public when faced with the construction of a new motorway tunnel is concern about the possible harmful impacts of the exhaust pollutants coming from stacks or other exhausts.

Harmful impacts from stack pollution do occur in the vicinity of poorly designed stacks such as the M5East stack in the Turrella valley and they can be severe enough to force people to move away from the area.

However, based on our experience with the M5East and other tunnels, it is RAPS position that, although there can be significant harmful impacts in localised areas outside tunnels from stack and portal emissions, the major impact occurs inside tunnels where the over 400000 daily users can be exposed on a regular basis to harmful levels of pollution.

In relation to the impacts on the greater public, we believe that actions taken to improve in-tunnel conditions, especially those which directly reduce the total quantum of pollution (and especially particulate matter) will also lead to a reduction in the pollution impacts both locally and on a city-wide scale.

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 in expressed in 2008, which we regard as authoritative and a true representation of the current state of scientific and medical knowledge.

We ask therefore that the position adopted by the EPA be reversed and that a clear statement be made about the extremely harmful nature of the fine particulate matter components of vehicle and especially diesel exhaust and the importance of limiting particulate matter levels inside tunnels be stressed.

We note that it was the high particulate matter levels (disingenuously labelled 'haze'), rather than nitrogen dioxide levels, which caused the problems in the M5East tunnel.

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' produced little more than a reaffirmation of the *status quo* in relation to in-tunnel air pollution levels, simply re-stating the existing PIARC norms.

This was in spite of the NHMRC(2008) report which identified the deficiencies of the current regulations and of a specific requests by organisations such as the Asthma Foundation that issues such as a proper mass concentration/exposure standard for particulate matter be resolved.

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.

As a group, we are not opposed to tunnels, *per se,* especially if they form part of a well integrated road and public transport plan.

Our issue is that the current standards and norms used for the design and operation of tunnels do not represent a conscientious response to modern medical knowledge nor to they give proper consideration to health, wellbeing and general amenity of ordinary members of the public.

Major Issues.

1. **Accuracy and reliability of the estimation of particulate matter in tunnels and in stack emissions.**

Background.

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, Bourke and William St.

The M5East 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 PIARC method for tunnel ventilation design

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 indicate there are real questions as to the suitability of these guidelines and their ability to reliably produce optimal outcomes.

These questions should lead a prudent person to question whether these guidelines are, in fact, suitable for use as a design guide for these tunnels and 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 $1000\mu g.m^{-3}$.

This relationship was conclusively shown to be incorrect in the M5East tunnel where, by actual measurement, it was shown that visibility levels of $K=0.005m^{-1}$ were indicative of particulate matter concentrations approximating $2000\mu g.m^{-3}$.

In spite of this 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 particulate matter concentrations, such as those in the stack, are underestimated by a factor of 2, hence all of the air quality estimates are necessarily flawed, as are any assumptions or decisions based on them.

Evidence of the unreliability of the PIARC conversion factor

'Those who fail to learn from history are doomed to repeat it' Winston Churchill (and others)

Soon after the M5East 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.

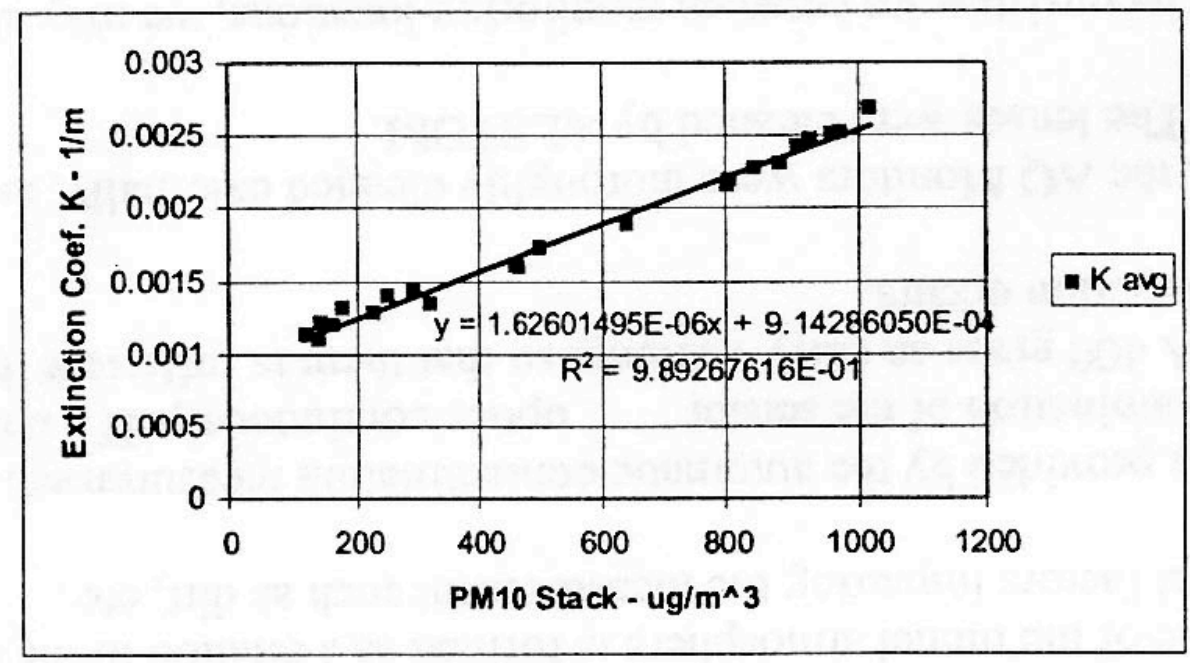

Figure 3. Correlation of extinction coefficient and PM10, concentration obtained from M5 East tunnel discharge stack data.

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.

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.

<u>Estimation of particulate matter emissions in the current EIS.</u>

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 for 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.

2. The question 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.

Filtration.

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*

Response

1. 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"
2. 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 (i.e. the M5East) are in excess of 1000 µg m^{-3} which is clearly dangerous to health."*
3. That the current 'allowable' pollution levels, especially for particulate matter in the presence of nitrogen dioxide, are demonstrably inadequate to protect the health and comfort of tunnel users.

- *Emissions from the ventilation outlets of the project tunnel will have a negligible impact on existing ambient pollutant concentrations*

Response

1. 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 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
2. 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.'*

- *Of the systems that have been installed, the majority have subsequently been switched off or are currently being operated infrequently*

Response

1. 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 story of the development and use of electrostatic precipitator equipment is long and complicated and a tendentiously simplistic view of its history is worthless. Electrostatic precipitator equipment has now reached a high degree of efficiency and reliability and techniques for its use continue to develop rapidly. Current experience is necessary if designers are to achieve the full design and economic potential of the technology.

- *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.*

Response

1. 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

2. 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 100m^3/sec treated. Energy consumption excluding fans is about 1.5kW per 100m^3/sec treated.

- *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.*

Response

1. 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.

- *This is a proven solution and more sustainable and reliable than tunnel filtration systems.*

Response

1. This assertion is open to question. 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) have shown that progressive in-tunnel filtration can reduce the total 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.

Deficiencies of the description of available filtration (electrostatic precipitator) technology

The best demonstration of the fact that the proponents have not conscientiously examined the potential use of filtration in tunnels, the pre-eminent concern expressed in community consultation, is shown by the inaccurate and confused nature of the description given under the section of the EIS entitled “Air Treatment Systems”.

At least 4 different types of technology are here conflated and confused and minor ‘concept designs’ are given more prominence than are fully established and operational systems.

No distinction is drawn between modern installations and equipment which is old and obsolete and the performance and removal efficiency of modern equipment is understated.

Any fair and conscientious examination of the operational performance of modern equipment would have examined, in detail, the massive installation of filtration in the Calle 30 ring route in Madrid.

This project includes electrostatic precipitator equipment from the 4 major suppliers of such equipment in the world Aigner, CTA, Filtrontec and Panasonic.

Although the method of deployment of the equipment (in stacks to reduce local pollution impacts) may not be what is most appropriate for Sydney’s needs, the scale of the project provides a firm basis upon which to draw conclusions about efficiency and reliability.

A summary of operational performance between 2008 and 2013 is given below, based on information which is easily accessible to those interested.

It is based on the report of the company maintaining the systems, which is independent of any of the manufacturers.

It was provided to a delegation from Hong Kong in 2013 and as the company Leightons is involved in both the current Hong Kong tunnel construction and in the M5 project, this information should have been directly accessible to them.

Calle 30 Filters: Performance evaluation.

	Strong Points	Weak Points
Aigner	Good efficiency, Good particle measuring method	Complicated installation, High number of failures (too many elements) High Maintenance costs, Too much automation
CTA	Uncomplicated Installation, Good efficiencies,	Poor particle measuring method (non-continuous)

	Robust, Little automation, Low maintenance cost.	Poor handling from control centre.
Filtrontec	Medium efficiency, robust electrostatic system, Little automation, medium maintenance costs	Poor particle measuring method (non-continuous) Poor efficiency. The equipment did not generate the expected solid waste.
Panasonic	Medium efficiency, robust electrostatic system, Little automation, medium maintenance costs	Poor particle measuring method (non-continuous), High number of failures in waste recycling system, Poor spare parts and after-service.

Particle removal efficiency %	PM1	PM2.5	PM10
Aigner	83.7	90.8	91.3
CTA	85.9	90.8	89.6
Filtrontec	76.6	77.1	76.5
Panasonic	79.8	80.8	81.2

It is evident to us that the equipment supplied by at least one company (CTA) and possibly another (Aigner) is fully capable of providing reliably operating high removal efficiency electrostatic precipitator equipment which is suitable for purpose. The comments about the Filtrontec equipment are entirely consistent with the unsatisfactory performance of this equipment in the M5East filter trial.

Filtration of the current project

The proposed tunnel is exceptionally long and will carry a relatively heavy load of medium and large trucks.

Progressive, in-tunnel filtration of particulate matter has been identified as suitable for this type of tunnel.

The economic advantages of this type of system was first demonstrated in the 11km Kan-Etsu tunnel in Japan where the conversion of the tunnel from 'traditional' ventilation using stacks to the use of progressive filtration demonstrated a 30% reduction in ventilation cost.

Although this is old information, the principle that is possible to reduce ventilation loads by removing pollutants inside the tunnel remains intact.

In addition, the reduction in particulate matter has the potential to reduce the harmful impact of nitrogen dioxide in the tunnel atmosphere.

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.

If, as in the case of the M5East, the particulate levels are higher than expected or if the advance of knowledge or understanding of the health risk from particles dictates limitation of in-tunnel particle exposure, then in-tunnel particle removal by the use of electrostatic precipitators should provide an effective and economical solution.

Space requirements for a filtration system in the new M5 tunnel.

Assuming the proposed tunnel is 3 lanes in width, the extra height required would be about 3 m over a length of 50 m, based on a proposal made by CTA in 2009 to retrofit filtration into the eastern end of the M5East tunnel.

In this proposal the power supplies were to be mounted on the platform which supported the filter modules and fans capable of moving the required volume of air, say 250 -300m^3/sec provided.

These fans to some extent replace existing jet fans.

Two such niches would be required in each tunnel and a total filtration capacity of about 1000-1200 cubic metres per second would be required.

Such a filtration system would have the capacity to significantly reduce both driver exposure and emissions to the atmosphere.

In addition the system should reduce the cost of operating the ventilation system.

The proponent should be required to constructively consult with competent manufacturers of filtration equipment to produce a realistically costed proposal for filtration inside the tunnel.

In Conclusion

It is evident that considerations of cost and operational convenience have dominated the design of this tunnel and there is no evidence to show that any attempt has been made to address well-founded community concern about potential health risks.

The whole design has been predicated on an outmoded and out-dated set of criteria which do not take into account changes in the toxicity of various components of vehicle exhaust, especially that of particulate matter and diesel exhaust, which is treated mainly as a nuisance limiting visibility.

Although lip-service is given to the importance of maintaining healthy conditions inside the tunnel, the changes in the nature of the in-tunnel atmosphere and its increased specific toxicity has not resulted in any change of consequence in the air quality limits used.

Although the EIS occasionally admits that there have been significant changes in particle size and distribution in diesel exhaust and a consequential increase in its specific toxicity, this had not led to any changes in the allowable levels of exposure.

Demonstrably, particulate tunnel exhaust, composed mainly of diesel emissions is much more harmful by any measure than is the particulate matter in the general atmosphere.

Any assessment method which simply adds these components on a basis of weight is necessarily flawed and scientifically invalid

Any safe and competent assessment of potential health risks from vehicle exhaust requires an accurate and robust way of predicting and estimating particulate matter and, especially, the quantity and nature of the various size classes.

The methods used to produce the whole of the air quality assessment lack any reliable way of estimating the actual gravimetric concentration of particle components and consequently the whole analysis is necessarily misleading and scientifically invalid.

The most common concern expressed by the community when it was 'consulted' related to filtration and in-tunnel air quality.

This EIS effectively ignores this concern, simply to assert that the required levels 'will be achieved without filtration.'

It fails to conscientiously examine the potential for the use of filtration as a way of improving conditions inside and out of the tunnel and demonstrates an ignorance of best practice in filtration showing clearly that the use of the technology was not seriously examined.

The community we represent and the tax-payers of the state in general are entitled to a clear and specific response to the issues raised and the apparent failure of the proponents to provide a fair and accurate representation of the likely environmental and human impacts of the proposed project.

We request that you advise the Minister to reject this proposal, and that you publish this submission in accordance with the undertaking on your website and provide a written response to the serious objections and issues raised here.

Mark Curran

President RAPS (Residents Against Polluting Stacks)

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: Lillian Rose
[redacted]

Address:
[redacted]

Bardwell Valley, NSW
2207

Content:
Please find my submission on the New M5 EIS as attached in the pdf uploaded to your website as shown below.

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Lillian Rose
Lillianrose561@gmail.com
28 January 2016

To the Director, Major Planning Assessments,
NSW Department of Planning

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

It is very concerning that the State Government released this EIS late last year during the school holiday period when most people are away on family holidays. This together with the State Government already signing multi-billion dollar contracts for West Connex before the EIS has been exhibited indicates to the community at large that this State Government has breached their own guidelines regarding genuine community consultation and shows a complete disregard of genuinely addressing the community's concerns and desires of how they would like to see their city develop and how it could sustainably function in moving people and goods around the city.
I strongly object to this project and the entire WestConnex of which this is a part, and ask that you reject this proposal on the basis that this environmental impact statement (EIS) is extremely inadequate for the following reasons:

- From the outset the West Connex and the New M5 has lacked transparency and accountability. There has been much concern about the way the WestConnex project has been developed and progressed regarding the lack of good governance, oversight and economic rationale for this major infrastructure project. The lack of transparency around the project, including state and federal governments' refusal to table documents detailing the cost-benefit analysis and traffic modelling used in the business case, is unacceptable.
- Having the project's further planning and implementation being managed by the newly created private corporation, the Sydney Motorway Corporation will further obscure information about the project which should be openly available to the public.
- The fact that the NSW Minister for Roads, Maritime and Freight and the NSW Treasurer hold shares in this corporation is a conflict of interest, given that their role as public officers should be to ensure that public funds and public/private projects are placed under the highest scrutiny.
- The WestConnex proposal is an enormously expensive project to build and will become an enormously expensive road for the general public to use in terms of high toll fees. The WestConnex toll road has blown out from an initial projected cost of $10billion to $16.8 billion and climbing.
- The project goes against world's best practice in terms of city and transport planning.The WestConnex project comes with no real evaluation of alternative options such as world class public and freight transport.
- Recent research from the Institute of Transport and Logistics Studies at Sydney University has warned the Government that Sydney motorists are unwilling to pay for more tollroads. Instead, motorists will look for free back-road routes, pushing more cars onto local streets.
- Roads such as the WestConnex suck the funds that could be funnelled into Public Transport.
- A combination of demand management of traffic and new public transport projects, especially for western Sydney, should have been explored. This is just one of many potential alternatives that could have provided more effective, sustainable and cost-effective ways of easing congestion that AECOM has failed to analyse.
- The project will increase the air pollution by encouraging more car use and will increase air pollution in the area where the exhaust stacks are to be situated.
- The proposed exhaust stacks will negatively impact nearby schools and nursing homes and residential homes. Unfiltered ventilation exhaust stacks are proposed to be located less than

500 metres from homes, public schools, childcare centres, aged care facilities and hospitals in the west, south west and inner west suburbs on the Westconnex route.

- The results of air quality modelling for annual average PM2.5 (particulate matter) in the WestConnex New M5 EIS, indicate that there will be an increase in the levels of this particle pollution at 63% of receptors along the proposed route resulting in levels way above World Health Organization guidelines.
- During the construction period, the New M5 EIS states that there will be up to 1,000 extra heavy vehicle movements (trucks) per day in the Kingsgrove and Bexley surface works area and approximately 1,240 extra light vehicle movements (presumably small trucks). The health impacts on the community and on workers from this amount of concentrated particulate pollution from diesel fuelled vehicles will be significant and is not adequately accounted for in the EIS or the updated Westconnex Business Case.
- By 2031 when the whole WestConnex project is slated for completion, total traffic demand will rise significantly, for example, demand in St Peters will increase by up to 33% and there will be significant increases in traffic on key roads within the project perimeters including sections of Parramatta Road, Broadway, King Georges Road, Stoney Creek Road, Bexley Road, Forest Road, Euston Road and many more smaller roads in local suburbs.
- It has been demonstrated time and again that building these expensive roads only encourages more car use quickly filling the increased road capacity.
- This EIS considers benefits for all stages of the project but **does not** address the negative impacts upon the whole route.
- The New M5 together with the rest of the WestConnex proposals will be a massive contributor to greenhouse gas emissions, while destroying important habitat and greenspace.
- The New M5 together with the rest of the WestConnex proposals will have an severe impacts on local communities, with many losing their homes or being greatly impacted by being in close proximity of the road and its accompanying infrastructure. There are over 80 homes and businesses impacted by the road alone in St. Peters.
- The impact of the New M5 on the largest green space in the inner west, Sydney Park would be devasting. As well as losing a significant portion of this park, there will be tunnels, ramps, ventilation stacks and multi lane roads with fast moving traffic, right alongside the park. Many residents and visitors to this iconic area of Sydney will be cut off from the park by the St Peters interchange and the widening of Euston Road to seven lanes between Sydney Park Road and Campbell Road. Again, all park users and local residents will be subject to high levels of pollution and noise.
- The WestConnex project will also lead to the destruction of more than 75 hectares of vegetation, including endangered Turpentine Iron Bark Forest and the critically endangered Cooks River Castlereagh Iron Bark Forest. The habitat of the vulnerable Green and Golden Bell Frog at Kogarah Golf Course at Arncliffe will also be adversely impacted by the New M5.
- The project's proponents have misled the public about its plan to take 14,000 square metres of Sydney Park. For months it said it would only take 8,000 square metres, leaving it until the EIS was lodged to inform the Council that it planned to forcibly acquire the rest. This will diminish the enjoyment of the park in many ways. Peaceful paths, exercise equipment, children's play areas and sporting grounds, and more will all be adjacent to a major highway. This is completely unacceptable.
- Valuable heritage buildings in St Peters will also be destroyed and/or left marooned and surrounded by tollway and congested roads.
- There are no clear plans of where millions of cubic metres of spoil will be deposited in communities in western Sydney. None of these communities have been given information or consulted about these impacts. This is unacceptable.

I agree that I have not donated more than $1000 to any political party, elected member, group or candidate within this financial year.

I agree to the NSW Planning Department publishing my submission on their website, including any personal details it contains.

Yours sincerely

Lillian Rose

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: Tim Brennan
[redacted]

Address:
[redacted]

Sydney, NSW
2112

Content:
The $16 Billion investment required to build the WestConnex Motorway project is an investment in the physical infrastructure of Sydney unlikely to be replicated for at least a decade. Considering the scale of the investment and the lifespan of project it would be reasonable to expect that this project would create a piece of infrastructure that would provide significant benefits to Sydney for at least the next thirty to fifty years. Equally it would be reasonable to expect that an investment of this scale would be based on a solid basis of evidence and planning presented to the public as openly as transparently as possible. Unfortunately this does not appear to be the case with WestConnex.

To make such a huge investment in road building (described by Roads Minister Duncan Gay as the equivalent of two Snowy River power schemes) is to dramatically over-invest in an out-dated model for the provision of urban accessibility. Already car usage is declining on a per capita basis and technological and cultural changes are likely to see this trend increase. Increasingly, the intertwining of car ownership, status, and identity is becoming irrelevant to younger generations. Ride-sharing is rapidly becoming a crucial part of the transport mix and in the coming decades (well within the lifetime of WestConnex) driverless cars will also play an important role. These technologies will provide better integration with public transport, further erode car ownership, and provide more efficient use of existing road stock.

Real estate prices highlight the desirability of urban lifestyles characterised by compact, walkable neighbourhoods provided with good public transport and cycling infrastructure. The liveability and sustainability benefits of this urban structure are well understood by urban planning professionals, and planning documents (including those of the NSW Government) aim to develop compact activity centres reliant on public transport. Investing in WestConnex is not simply out of step with the objective of creating a more compact, sustainable, and liveable Sydney it will, in fact, be detrimental to the viability of existing attempts at urban renewal such as Green Square and Ashmore.

These trends suggest that WestConnex will be an investment in a mode of transport that has entered a long-term decline, however investment in road infrastructure has repeatedly been shown to create induced traffic growth. Effectively Sydney will be investing significant funds to provide an incentive for car use and entrench Sydney's auto-centric urban structure. It will simply make the necessary, and inevitable, transition to a more sustainable transport system more costly and difficult.

WestConnext will also result in increased greenhouse gas emissions, increased air particulate pollution, and increased deaths and injuries from road accidents. It will heavily impact on the liveability of the densely populated inner west suburbs. In return for these impacts and the $16 billion price tag a study by SGS Planning and Economics found that the impacts of WestConnex would make only a `minor difference' to Sydney's traffic conditions.

Alternatively, the $16 billion investment could be used to provide a step-change in Sydney's transport system, enabling Sydney to move away from its dependence on cars for the bulk of its transport needs. The potential list of projects that this funding could be

used for is long, it could play a huge role in overcoming key bottlenecks such as Town Hall Station and the Harbour Crossing that constrain the capacity of the whole rail system. It could replicate Perth's success in rolling out rail lines to currently car-dependent outer suburbs. It could build on the work of the City of Sydney and create a metropolitan wide network of segregated cycle lanes. It could massively increase the coverage and frequency of bus and light rail routes. The reality is that there would be a a suite of cost-effective projects that could be delivered for $16 billion. If these projects were combined with well planned land use projects they could potentially play a huge role in transitioning Sydney to a sustainable, integrated transport system suitable for the conditions of the 21st Century. WestConnex represents 16 billion dollars of lost opportunity for Sydney.

An investment of the scale of WestConnex should be made on a sound and rigorous evidence base and using a transparent and accountable process with which the public can have complete confidence. This has clearly not been the case with WestConnex.

The traffic forecasts the project is based on need to be treated with scepticism. Traffic modelling has been shown to be susceptible to optimism bias and Australian traffic modelling does not have a recent history of success in forecasting patronage numbers for major road projects. In Brisbane the Clem 7 tunnel and Airport Link have recently proved to be major failures due to vastly exaggerated traffic forecasts. In Sydney both the Cross City and Lane Cove tunnels were built on the basis of traffic forecasts that were significantly higher than actually recorded results.

The decision to use AECOM to undertake traffic modelling despite recently having settled a case claiming its traffic forecasts represented `false, misleading, and deceptive conduct under the Trade Practices Act' (in relation to Clem7) is questionable. The fact that AECOM also stands to benefit from contracts relating to the construction of the project is even more worrying.

WestConnex locks Sydney into future greenhouse gas emissions and public health impacts without improving the ability of Sydney citizens to access opportunities and services. At a cost of $16 billion that represents a very poor investment for Sydney.

Tim Brennan,
Private Citizen.

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: Peter Mills
[redacted]

Address:
[redacted]

Warrawee, NSW
2074

Content:
I attach two documents

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

WestConnex or What?

Those asserting that we have no choice but to build WestConnex seem blind to its many problems. Action for Public Transport (NSW) believes the drawbacks of this project are so significant that a major rethink is essential.

The first drawback is cost. At around $450 million per km and based on current light vehicle occupancy, the yet-to-be-contracted stages of WestConnex could carry up to 8,400 people per hour on each three lane carriageway. Two rail-based projects currently under way in Sydney demonstrate that good public transport offers better value for money. The CBD and South East Light Rail project will provide a similar ultimate passenger capacity at less than half the capital cost per km of WestConnex. Similarly, the North West Sydney Rapid Transport project will provide many times the passenger capacity of WestConnex, and still for a good 20% less cost per km. The advantage for public transport would be even more favourable if an allowance for the capital cost of cars is added to the WestConnex figure.

The second drawback is that the claimed time savings for motorways are prone to overstatement. This is due to a combination of demand forecasts being influenced by the chase for a good financial outcome, and by a self-serving traffic modelling process that does not factor in medium and long term changes in demand. The result is an unrealistically high level of road network congestion being forecast if WestConnex is not completed, and this leads to the claimed benefits being overstated when a comparison of forecast congestion levels with and without WestConnex is made. There is a long history of such demand changes being induced.

It was the early Macquarie Street Mint economist William Stanley Jevons who first observed that more efficient production (in this case coal) led to higher consumption, rather than to lower costs as intuitively expected. 150 years later this effect is referred to in transport planning as demand elasticity with respect to generalised cost, of which time is the major component. This elasticity can be related to empirically observed behavioural tendencies to maintain a constant travel time budget over the medium to long term, and means that the future demand without WestConnex must turn out to be less. Travel response mechanisms to achieve this can include time shifting, going shorter distances, ride sharing, use of alternative modes and trip purpose amalgamation. Such savings are reversed when road capacity is expanded, which explains the well known phenomenon of induced traffic.

Other drawbacks include the social and environmental impacts from the increase in traffic and car dependency upon which the claims in favour of WestConnex have been based. That said, there is a need to realistically consider freight, trade services and car travel involving diverse origins and destinations. Setting aside the first two for the moment, the sheer mass of private vehicles to be carried, with fewer than 40% serving more than one occupant, points to an ongoing lack of productivity for WestConnex. Household Travel Survey statistics also reveal a lack of productivity, with commute travel distance over all modes being twice that for the average of each other less obligatory trip purpose. Clearly there are major structural inefficiencies in Sydney's transport and land use that need to be tackled.

Planning NSW implicitly signalled the need for structural change with the visionary 2004 announcement of a "city of cities" future for Sydney to improve what is referred to as the effective jobs density, particularly for areas outside the Sydney CBD. What has been lacking is the evolution of public transport from what is mainly a radial commute network into an interconnected web of rapid routes. By making cross-town access to the web intersection points as convenient as access to the Sydney CBD, nodes of knowledge based employment and other activities can agglomerate in a self reinforcing process for patronage on such a web. There is a special need for access with a long reach to be provided for Parramatta in its role as the second CBD.

The passing of ten years since the "city of cities" announcement without major progress towards a supportive public transport infrastructure can be linked, for example through the increasing Western Sydney employment deficit, to the worsening traffic congestion being experienced in Sydney. Thus WestConnex looks like a panic reaction to this neglect where the multiple drawbacks mentioned above are simply to be ignored. However it may not be too late to instead accelerate the construction of a public transport rapid web network if combined with some short-term measures to ease road congestion. An example would be managed ride sharing on selected road commutes until reductions in per-capita metrics such as commute distance and transport pecuniary cost are being achieved.

Structural changes to land use and transport over time, that enable the volume of diverse origin and destination car use to be reduced, would improve road travel conditions for those that remain, including the providers of freight and trade services that make up a minor, but growing, share of the total traffic. Only then can the needs of these users be efficiently considered, with the possibility of dedicated infrastructure provided on commercial terms being part of the mix.

Public transport funding mechanisms also need to be revised as a complimentary measure. While public transport and land use benefits, and road use externalities, are already partially recognised through community-accepted subsidies, rates and user charges, a formal linkage of these cash flows is needed. This would put urban road and rail funding on a more equal footing. An extensive and well patronised rapid public transport web that provides comprehensive multi-dimensional accessibility is the mark of great and liveable global cities.

While there may be no single *project* alternative to the remaining stages of WestConnex, there is a *strategic* alternative that better suits a nation struggling to live within its means.

Peter Mills

Consultant to Action for Public Transport (NSW)

March 2015

Reference data attached

Project Cost and Capacity

WestConnex Unit Cost

2012 announcement	$11.5 billion for 33 km
Adjustment to 2014 Dollars	$12.0 billion for 33 km
M4 Widening stage (Contracted 7.5 km)	$0.5 billion for 7.5 km
Remaining stages (25.5 km based on the original length)	$11.5 billion for 25.5 km
Initial unit cost for the yet-to-be-contracted stages	**$450 million/km**

West Connect Later Stage Capacity (approx.)

Initial capacity with two lanes and 1.4* occupancy	5,600 people/hour
Ultimate capacity with three lanes and 1.4* occupancy	**8,400 people/hour**

CBD and South East Light Rail Unit Cost

2014 contract announcement	$2.1 billion for 12 km
Initial unit cost	**$175 million/km**

CBD and South East Light Rail Capacity (approx.)

Initial capacity with four minute intervals	7,000 passengers/hour
Expanded capacity with 3.25 minute intervals	**8,500 passengers/hour**

North West Sydney Rapid Transit Unit Cost

2014 contract announcement (including trains)	$8.3 billion for 23 km
Estimated allowance for Epping-Chatswood conversion	$0.2 billion
Project remainder for the length of the new route, without deducting a cost allowance for the Epping-Chatswood share of trains	$8.1 billion for 23 km
Initial unit cost	**$350 million/km**

North West Sydney Rapid Transport Capacity (approx.)

Initial capacity with six car trains at four minute intervals	17,000 passengers/hour
Ultimate capacity with 8 car trains at 2 minute intervals	**45,000**** **passengers/hour**

* Road capacity is 2,000 light vehicles per hour per lane multiplied by the average light vehicle occupancy of around 1.4 taken from the 2012/13 Household Travel Survey published by BTS. Occupancy of 1.4 implies that less than 40% of vehicles have more than one occupant as some vehicles will have more than two occupants.

** The present maximum Sydney Commuter Rail capacity (double deck trains) is lower at about 25,000 passengers/hour (due to less people standing), with some increase being planned.

Trip and distance data from the Household Travel Survey Report: Sydney 2012/13 available here:

http://www.bts.nsw.gov.au/ArticleDocuments/79/r2014-11-hts-summary-report_12-13.pdf.aspx?Embed=Y

Tables used as a source of data: Note that these are for the Sydney Greater Capital City Statistical Area (GCCSA) whereas WestConnex was probably modelled with traffic forecasts from the Sydney Statistical Division where vehicle occupancies could be marginally different.

4.2.2 Proportion of trips by purpose
4.3.2 Proportion of trips by mode
4.4.3 Proportion of distance by mode
4.4.5 Proportion of distance by purpose

Proportions	Trips	Distance
Commute	15.2%	25.9%
All other trip purposes	84.8%	74.1%
Vehicle driver	47.2%	58.7%
Vehicle passenger	21.8%	21.8%

Commute D/T ratio: 25.9/15.2=1.70 undefined length units/trip

All other D/T ratio: 74.1/84.8=0.87 undefined length units/trip

Commute to all other distance ratio: 1.70/0.87=1.95

Vehicle occupancy by trip: 21.8/47.2=1.46

Vehicle occupancy by distance: 21.8/58.7=1.37

Note 1: Occupancy for trips is higher than for distance, indicating that long trips on WestConnex would on average be below the distance occupancy shown above.

Note 2: The Transport Supply and Demand Forecasts for the Sydney Statistical Division, which have presumably been used to model WestConnex, show that vehicle occupancy has been assumed to be 1.31 in 2016 and declining thereafter. The TransData document is also available at:

http://www.bts.nsw.gov.au/ArticleDocuments/80/trans2014-03-stm-travel-forecasts.pdf.aspx

New M5 East Submission

Much of the case for WestConnex is based on more of the same business-as-usual approach to road infrastructure that has already seen Sydney become more congested over time.

A specific measure of the problem is the excessive resources being devoted to commuting. The modelling used does not illuminate these costs, as the commuting requirement is defined as part of a demand to be met rather than a parameter to be optimised. Further, the limited study area used for evaluation means that the adverse impact of traffic growth outside this area is not taken into account.

The modelling can also suffer due to its method of comparing congestion costs "with" and "without" the project that is being evaluated. This is because a simple subtraction of these costs will overstate the benefits where longer term adaptive processes need to be considered.

There is evidence of such adaptive processes in Sydney. Data from the Household Travel Survey (BTS, 2014) shows a 2% decline in VKT per capita and a modal shift from car to public transport of 1% over a 10 year period that can plausibly be linked to an increase in avoidable congestion costs. The publication Traffic and Congestion Cost Trends (BITRE is_074, 2015) shows an increase in these annual costs from $3.69 m to $5.76 m (56% overall or 38% per capita) in constant 2010 dollars over the same 2003/2013 period, while the BTS reports no change in the 81 minutes per capita travel time for each weekday. The shift to public transport amounts to a 7% increase in use per capita, or 21% overall as reported by the BTS, and the total travel distance per capita has declined by around 1%.

The BITRE provides some useful background on day-to-day travel:

> During most of the first half of the 20th century, the typical amount of time spent on day-to-day travel by a capital city resident was a little over an hour each day (averaging approximately 64 minutes/day per capita). Yet with the speed advantages then offered by car use (accompanied by considerable improvement and spread of city road systems and an even faster expansion in car ownership), the post-war period saw this average daily travel time decline throughout the late 1940s and the 1950s, eventually falling almost as low as 50 minutes/day per capita by the mid-1960s. However, as the major cities were by then growing strongly outwards, often leading to longer and longer average trip lengths, and the mounting popularity of car travel started contributing to busier and busier roads, the daily travel average climbed back over the hour mark during the 1970s. Daily time spent travelling kept climbing throughout most of the rest of the century, and the existing combination of network congestion and increased trip distances have contributed to current levels for urban travel time (which have averaged around 85 minutes/day per capita over last decade) being significantly above the long-term historical norm.

Given that a 38% per capita increase in the cost of avoidable congestion has occurred over the last 10 years without any increase in the total travel time per capita, Sydney is evidently now operating in what can be called a saturation mode. This means that the hypothetical increase in congestion costs that is predicted by the modelling without the project would not all flow through to a real-world increase in travel time per capita, and so the difference between the "with" and "without" congestion costs will overstate the benefits. This leaves a much smaller, if any, reduction in the travel time per capita that can be achieved from a major increase in road capacity for general traffic under saturation conditions, although congestion could still be eased. Accordingly, road investment in saturated urban areas has become a zero-sum game, with a balance of winners and losers, as many world cities have already realised.

Sydney's reported experience with free flowing traffic in the 1960s, with its daily travel time per capita as low as 50 minutes, is also a warning that too much reliance on road investment today can lead to saturated conditions in the future. The mechanism here seems to be that saturated conditions have spread out from inner areas in the past to encompass much of Sydney today, suggesting that saturation is related to size.

The BTS also provides a measure of the excess commuting, with 15.2% of trips and 25.9% of distance travelled on an average 2013 weekday. This means that the commuting distance per capita is 1.95 times the average for all other trip purposes. Another measure of excess commuting is given by the Western areas employment deficit. It is tempting to suggest that the excess daily commuting time per capita could be related to the total travel time per capita now being higher than the long term average of 64 minutes per capita.

What then for addressing the cost of avoidable congestion where road investment is a zero-sum game? BITRE expects such congestion to continue increasing over time under business-as-usual conditions, but is uncertain about the rate. It has identified a range of values from $8.66 m to $16.16 for the cost of avoidable congestion in 2030, up from $5.76 in 2013, with all costs expressed in constant 2010 dollars. This 13% to 111% per capita increase depends on a spread of future VKT per capita assumptions that range from a slowing decline to a significant increase. Such cost predictions, along with an apparent longing for less daily travel time per capita, command ongoing attention for action.

An alternative approach to major road building is to accelerate the decline in VKT per capita. Key elements of this approach are jobs closer to home and a more extensive public transport network, with digital disruption playing a useful role. The first element alone has been tried, but success was not sustained due to a decline in manufacturing and a spreading out of road congestion. The growth in knowledge based employment, with its dependence on clustering, increases the viability of deploying public transport more extensively in the future.

The strategic concept of a city of cities was announced over 10 years ago. The concept can be described as a cellular city structure where much of the transport capacity is able to be spatially recycled. This resembles the design of mobile telecommunications networks where all local capacity is spatially recycled through reducing the cell size as demand increases, and high capacity fibre links between cells are provided. Realisation of the concept requires a web of strong (fast, frequent and with convenient interchange) and segregated public transport links to enable, due to better accessibility and less need for parking, agglomeration to occur at multiple locations. In practice, the degree of agglomeration will tend to be activity dependent, so the cellular structure will similarly tend to be multi-layered.

The impact of road congestion per capita should then be lower simply because light vehicle road traffic becomes a smaller part of the overall transport task. Congestion may also fall in line with an expectation that the smaller city cells could each function with a lower level of saturation, but it is not clear if any significant reduction in daily travel time per capita would then be achieved. A lower density of light vehicles would also have noise and pollution benefits. Dedicated road capacity for mainly non-local freight vehicles will still most likely be needed where the remaining road congestion would impose uneconomic costs on this traffic.

In conclusion, reducing the impact of road congestion per capita by managing the size of the light vehicle general traffic network would be a more effective and sustainable target for governments to embrace than "busting" congestion per se.

Peter Mills
January 2016

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: Shane Anthoney
[redacted]

Address:
[redacted]

Petersham, NSW
2049

Content:

I oppose the WestConnex project and call for the M5 East Green Link high-quality cycling and walking link connecting Bexley North Train station to Sydney Airport instead.

The M5 East green link will provide a high-quality, low stress, and largely off-road cycleway connecting south-western Sydney and the CBD, via the airport. Not everybody wants to drive everywhere and good cycling and walking infrastructure should be delivered.

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[redacted]

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Content:
CONTINUOUS SNUBBING OF COMMUNITY
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.

Just another reason for the loos of habitat and a beautiful forest to strongly object to the westconnex

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[redacted]

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[redacted]

[redacted]

[redacted]

[redacted]

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[redacted]

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Content:
IRRESPONSIBLE GOVERNANCE

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. We are 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.

Just another hundred or many more reasons to object to the westconnex

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[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: Mark Grayson
Organisation: Knight Frank Town Planning (Director)
Govt. Agency: No
[redacted]

Address:
[redacted]

Sydney, NSW
2000

Content:
Please see uploaded document.

[redacted]

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[redacted]

[redacted]

Knight Frank
TOWN PLANNING

29 January 2016

Director Infrastructure Projects
Planning Services
Department of Planning and Environment
Application number SSI 14_6788
GPO Box 39
Sydney NSW 2001

CC: Botany Bay Council

Dear Sir/Madam

RE: SSI 14_6788 – West Connex New M5 East – Environmental Impact Statement

Executive Summary

The proposed upgrading of Gardeners Road will have a significant and detrimental impact on our clients' established businesses on the south side of Gardeners Road. No account or consideration has been made as to the direct impact that the road upgrading will have on the ongoing operation of these businesses. This impact will have material and direct consequences on their commercial viability and places at risk a significant number of jobs.

Introduction

We refer to the West Connex New M5 East Environmental Impact Statement (EIS) that is currently on exhibition. On behalf of our clients', thank you for the opportunity to make a submission. This submission is made on behalf of the following businesses:

- Vag Group Pty Ltd (Lonsdale) – 2 Kent Road, Mascot (Lot 1 DP 529177)
- F.J Chickens (Farmer Joe's Chicken) – 685 Gardeners Road, Mascot (Lot 2 DP 529177)
- Netty Investments Pty Ltd (Cue Clothing Company) – 687 Gardeners Road, Mascot (Lot H DP 361852)
- PAL Group Pty Ltd (Gold Ice) – 689 Gardeners Road, Mascot (Lot 1 DP 1098547)

These properties will be directly affected by the West Connex proposal via the proposed widening of Gardeners Road and the new Gardeners Road Bridge connecting with the St Peters Interchange. These properties will collectively be referred to in the submission as "the subject sites". Their location on Gardeners Road, Mascot is illustrated in Figure 1 below.

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Figure 1: An aerial view of the subject sites on Gardeners Road. (Source: Sixmaps)

With the exception of Gold Ice as a new business, the businesses operating within the subject sites are well established. The individual uses are consistent with the relevant development approvals. The following summarises the nature of the businesses operating within each of the sites:

Lonsdale – 2 Kent Road, Mascot

Lonsdale currently operates within the site and is a wholesaler and retailer of clothing and accessories, founded in 1976. The company has approximately 400 wholesale customers and 18 retail shops in Australia. The company purchased the site in September 2007 and commenced operations from early 2008. The site houses their office staff and warehouse. The warehouse is open to the public twice a year for a 1 week period where they run a warehouse sale.

Lonsdale has 50 full time equivalent (FTE) employees working at the premises supporting 105 FTE employees in their retail stores.

The business relies on vehicular ingress and egress into the site directly from Gardeners Road. Vehicle movements into and from the site includes an average of 2 container trucks per week (carrying 20 foot and 40 foot containers), 2 pallet loading trucks per week and 2 freight loading trucks per day. The dimensions of the container trucks require them to reverse into the site.

The Lonsdale site has approximately 58 car parking spaces used by its employees and visitors and is fully utilized the majority of the time. During the warehouse sale, employees are required to use the available on-street parking on Gardeners Road to allow customers to use the car park.

The site is strategically important to the Lonsdale business as it:

- Is well connected to both sea and air freight for incoming goods transported by heavy vehicles
- Has a central location for outgoing freight by both trucks and couriers
- Allows good access into the site for heavy vehicles – the local traffic characteristics of this section of Gardeners Road allows heavy vehicles to safely manouvre into the site
- Provides ample on-site and on-street parking for their customers during warehouse sales
- Has good connections to public transport links for employees (proximity to Mascot station)

Farmer Joe's Chicken – 685 Gardeners Road, Mascot

Farmer Joe's Chicken currently operates at the site and is a privately owned Australian company which provides poultry products throughout NSW and the ACT and has been operating for over 25 years. The business has been operating on the site since 2004. The company provides wholesale poultry to a wide range of customers including hotels, restaurants, caterers, schools, hospitals, corrective services, government and ANZ Stadium. The site is in operation 24 hours a day, 6 days a week.

Farmer Joe's Chicken has approximately 90 FTE employees working at the premises.

The business relies significantly on a high volume of daily vehicular movements into the site. Vehicle movements entering and exiting the site include an average of 4 semi-trailers per day, 2 six-tonne trucks per day and 18 delivery vans per day. The access arrangements of the site require the trucks to reverse into the site off Gardeners Road.

The site has 11 car parking spaces used by employees or customers during the day. During the evening, some delivery vans park within the site and remaining delivery vans (approximately 15) park on Gardeners Road. It is estimated that approximately 65 employees park in Gardeners Road during the course of the day and night depending on their shift time.

The site is strategically important to the business as it:

- Has high accessibility to major roads
- Has minimal traffic as it is a "dead end" street and allows heavy vehicles to safely enter and exit the site
- Provides good availability and accessibility to on-street parking
- Is in close proximity to suppliers
- Is central to their customer base and in close proximity to customers in the Sydney CBD
- Is in close proximity to Sydney Airport for interstate deliveries
- Has adequate space to expand the business operations in the future
- Is in a central location for employees
- Good connections to public transport

Cue Clothing Company – 687 Gardeners Road, Mascot

Cue Clothing Company has operated within the site since 2002 following a significant expansion of their retail store operations. The site is the sole warehouse for the storage and distribution of Cue clothing and

Veronika Maine garments in Australia. Dion Lee, a Cue majority owned high end designer brand also operates their warehousing and distribution from the site.

The warehouse supports over 210 retail locations in Australia and New Zealand and in excess of 1200 employees. Cue is a 100% Australian owned company and a significant percentage of their garments are made in Sydney. The Cue, Veronika Maine and Dion Lee online stores also operate from this warehouse site.

Cue has 13 FTE employees working at the premises, 1 part time employee and up to an additional 5 FTE employees during peak trade periods.

The site has 6 car parking spaces used by employees. Employees also utilise the on-street car parking on Gardeners Road.

The company relies significantly on a high volume of daily vehicular movements into the site. Vehicular movements include 1 semi-trailer per week, 2 twelve-tonne trucks per day, an additional twelve-tonne truck every second day carrying 14 pallets, 10-15 delivery vans per day or 4 six-tonne trucks per day and approximately 10 courier vehicles daily. There is no provision or space for trucks or vans to turn on the premises and are typically required to reverse in off Gardeners Road.

The site is strategically important to Cue as the location and accessibility of this warehouse for their manufacturers is a critical component of their Australian made program. The site is well connected and in close proximity to Sydney Airport and key roads for distribution to their retail locations. The quiet nature of Gardeners Road adjacent to the site allows safe access for the high volume of vehicles entering and exiting the property on a daily basis.

Gold Ice – 689 Gardeners Road, Mascot

The site at 689 Gardeners Road, Mascot received approval in 2014 from Botany Bay Council for part demolition and alterations and additions to an existing industrial building comprising upgrades to the building façade, construction on an onsite car park for 68 vehicles and change of use for an indoor ice skating rink and café. The ice skating rink is currently under construction and is nearing completion with an anticipated opening date in February 2016.

Gold Ice will have approximately 10 FTE employees working at the premises.

The site will have 68 off-street car parking spaces and will rely on the existing on-street car parking on Gardeners Road to cater for their customers during busy periods.

The site is strategically important to the business as it is centrally located and well connected to major roads for their customer base, employees and deliveries. Gardeners Road provides ample off-street parking when car parking on site is at capacity. The use can operate with minimal impact on the amenity of the surrounding land uses and has good connections to public transport for customers and employees.

Issues

The widening of Gardeners Road and subsequent connection to the Gardeners Road Bridge and St Peters Interchange as detailed in the EIS raises numerous issues for the subject sites including:

- Impact on access to site for heavy vehicles during road upgrade works to Gardeners Road and long term
- Restricting right hand turn movements from all sites which are currently possible and with a subsequent major practical impact on the operating of each business
- Loss of on-street parking
- Impact on pedestrian safety and amenity/Loss of patronage
- Permanent acquisition of land
- Lack of consultation with our clients despite each being directly and significantly impacted by the proposed road upgrades
- Impact on overall business operation, cost of relocation/closure, potential job loss
- Amenity impact on office uses
- Impact on future use of the sites for airport related uses

The above concerns are discussed in detail below.

Impact on Access into Subject Sites

The widening of Gardeners Road will significantly restrict access for heavy vehicles into the subject sites. The nature of the businesses operating within the sites involves numerous vehicular movements per day. The type of vehicles entering and exiting the sites are detailed above and include semi-trailers and trucks carrying 20 and 40 foot containers which are required to reverse into the site off Gardeners Road due to limitations on turning within the sites.

The widening of Gardeners Road during its upgrade and subsequent operation including a median strip restricting right hand turns, will obstruct the entry and exit of all vehicles into the subject sites. As a direct result of the proposed road upgrading, Lonsdale, Farmer Joe's Chickens and Cue Clothing Company businesses will not be able to continue from their current sites.

The impact on access and the consequent direct impacts on the operation of the businesses within these sites have not been adequately considered in the EIS. Furthermore, it appears that no consideration has been given to the likely adverse impact on the commercial viability of each of the sites as a result of the proposed altered traffic movements into and out of each site and the consequent effect on customers, clients and service vehicles. The proposed limit on vehicle access to the sites will have a direct and material impact on their commercial viability.

Loss of On-Street Parking

The EIS indicates that the widening of Gardeners Road will result in a loss of 47 on-street parking spaces. The subject sites heavily rely on the existing on-street parking for their businesses to operate.

The recently approved ice skating rink at 689 Gardeners Road provides 68 off-street car parking spaces however is dependent on the use of on-street parking to cater for customers during their busier operating periods. This is acknowledged by Botany Bay Council in their assessment of the development now being constructed.

Cue provides 6 on-site car parking spaces used by its employees and is at capacity during business hours. The remaining employees rely on the available on-street car parking on Gardeners Road.

Lonsdale provides 58 car parking spaces which are used by its employees and visitors and is fully utilized the majority of the time. However, for 2 weeks a year, the site is open to the public for its warehouse sale. During the warehouse sale, employees are required to use the available on-street parking on Gardeners Road to allow customers to use the car park.

Farmer Joe's Chicken has 11 off-street car parking spaces used by employees and customers during the day. At various times during the day, delivery vans utilise the on-street parking on Gardeners Road while waiting to enter the site to be loaded or cleaned. During the evening, some delivery vans are parked on site and approximately 15 delivery vans park overnight on Gardeners Road. It is estimated that approximately 65 staff employed by Farmer Joe's Chickens use the on-street parking during the course of the day and the evening depending on their shift. The use of on-street parking is vital to the ongoing operation of the business. The business operates 24 hours a day, 6 days a week and as a result, the use of public transport by staff is inconvenient and raises concerns of safety for the staff working the night shift.

For all practical purposes, Gardeners Road at its western end acts as a local access road. The local character of this western end is significant as it facilitates the specific local needs of important employment uses. These local employment uses arguably have metropolitan significance given the confirmed Sydney and national market that a number of the businesses operate in and are headquarters for.

Impact on Pedestrian Amenity/Loss of Patronage

The accessibility of the subject sites by public transport for employees and customers is of significance to the businesses operating within the subject sites. The widening of Gardeners Road and connection to the Gardeners Road Bridge and St Peters Interchange will significantly change the local road character of this section of Gardeners Road.

The widening of Gardeners Road and narrowing of footpaths will reduce pedestrian safety and amenity when accessing these sites from public transport nodes. The proposed road upgrades will discourage pedestrians from using public transport to access these sites and encourages the use of private vehicles. As a result, any available off-street car parking within the subject sites including the car park within Gold Ice will be at full capacity. Adverse pedestrian safety and amenity impacts and increased reliance on off-street parking will see a loss of patronage and significantly impacts on the future commercial viability of the subject sites.

Acquisition of Land

The EIS indicates that a portion of the subject sites along Gardeners Road and Kent Road will be acquired as a result of the widening of Gardeners Road. The landowners of the subject sites have not been notified or consulted of this acquisition. It is critical that the boundaries of the subject sites along Gardeners Road and

Kent Road and the land to be acquired be accurately pegged to allow the appropriate consultation to occur prior to the endorsement of any final plan.

Lack of Community Consultation

The Secretary's Environmental Assessment Requirements include consultation with affected and adjoining landowners during the preparation of the EIS. The landowners of the subject sites were not consulted during this time despite each being directly and significantly impacted by the proposed road widening and upgrades.

The businesses operating within the subject sites inadvertently learnt of the project through the local newspaper and a subsequent phone call to the West Connex information line. Some of the business operators were in attendance at the information session held at Botany Bay Council. The West Connex representatives indicated at this session that a mail out had already occurred. None of the owners of the subject sites have received this communication.

Impact on Amenity of Office Uses

The upgrade and widening of Gardeners Road and the subsequent operation of this road connected to the St Peters Interchange will result in a significant impact on the amenity of the ancillary offices uses within the subject sites. The noise impact resultant from the use of the 6 lane carriageway will adversely impact on the ability to conduct business operations.

Strategic Importance of the Subject Sites to Sydney Airport and Port Botany

Direction 1.5 of A Plan for Growing Sydney (the Plan) is to *"enhance capacity at Sydney's gateways and freight networks".* Action 1.5.1 of this direction is to *"develop and implement a strategy for the Sydney Airport and Port Botany Precincts to support their operation, taking into account land uses and the proposed road transport investments".*

The Plan emphasises the importance of the land around Sydney Airport and Port Botany in supporting and maximising the contribution of these facilities to the economic activity of Sydney. The Plan states that *"the government will work with local Councils and the airport and port authorities to:*

- *Identify strategically located sites that support freight activity and movements around Sydney Airport and Port Botany*
- *Protect strategically located sites that support the freight network, commencing with areas most affected by aircraft noise".*

A recent Planning Proposal prepared by Botany Bay Council regarding airport related uses is applicable to the subject sites and confirms their strategic importance in supporting the role and function of Sydney Airport. The Planning Proposal seeks to introduce additional permitted uses relating to Sydney Airport on land located north of the Airport in Mascot. The purpose of the Planning Proposal is to cater for airport related activities and land uses on land near the airport to support its role as a transport gateway. The Planning Proposal is currently awaiting Gateway Determination by the Department of Planning and Environment.

The Planning Proposal states that *"the introduction of additional permitted uses will provide certainty to aviation-related activities and uses presently undertaken on these properties and those that are planned in the future; protect aviation-related uses within the Botany Bay LGA; enable the clustering of airport-related uses and developments; avoid incompatible development or uses in the vicinity of the Airport; and underline the importance of these properties in supporting the role and function of Sydney Airport as the gateway to NSW and Australia".*

The widening of Gardeners Road and limitations on access to the subject sites for heavy vehicles in particular will significantly restrict future development occurring on the sites relating to the use of Sydney Airport such as the following:

- Freight transport facilities
- Industrial training facilities
- General industries
- Light industries
- Storage premises
- Transport depots.

The Planning Proposal, the future likely permissible uses stated above and the relevant directions and actions in A Plan for Growing Sydney highlights the importance of protecting these sites for future freight network uses servicing Sydney Airport. In this regard, it is vital to maintain adequate access for heavy vehicles along Gardeners Road into these sites. To not do so is inconsistent with both local and State planning and employment priorities.

Overall Impact on Business Operations

The upgrade and widening of Gardeners Road connecting to the new Gardeners Road Bridge and St Peters Interchange will result in a detrimental impact on the operation of the business within the subject sites along Gardeners Road. As discussed previously in this submission, aspects such as accessibility into the site for heavy vehicles will be severely impacted. In addition, the on-street parking which the operation of these businesses heavily rely upon will be lost.

The proposal will result in a significant and material adverse economic impact on the directly adjoining properties which has not been addressed in any manner by the EIS. This will result in the forced relocation and/or possible closure of these businesses on their existing sites. The consequences on the commercial viability of each business will be significant when considering the following:

1. The disruption to operations in the relocating to an alternate location
2. The likelihood of having to locate to less optimal locations when compared to the strategic current location close to Sydney airport, Port Botany and transport.
3. The risk to the retaining of local Mascot jobs including at risk, a large number of semi-skilled jobs.
4. The cost of relocating to suitable alternate locations.

No mention is made as to the manner in which our clients will be compensated for the direct impacts of the proposed road upgrading.

As an example, Farmer Joe's Chickens are unlikely to find a similar fitted-out premise in the vicinity of their current location. The cost of relocating the business would significantly impact on the future viability of the business. Should closure of this business occur, up to 90 local jobs will be at risk of being lost to Mascot.

We request that the Department of Planning and Environment strongly considers our above comments and not support the proposal in its current form given the detrimental economic and social impacts as a result of the proposed widening of Gardeners Road.

Thank you again for the opportunity to comment and we trust that careful consideration will be given to the comments we have made.

Please feel free to contact me on [redacted] should you have any further questions.

Kind regards,

Mark Grayson
Director

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: Tully Mansfield
[redacted]

Address:
[redacted]

Sydenham, NSW
2044

Content:
To whom it may concern,

Instead of spending billions of dollars on an insane project that no one wants or needs and which will simultaneously increase congestion and pollution whilst destroying parkland and devaluing properties, maybe just... don't? And hey, if you're insistent on spending all of our taxes on things, our public transport system isn't exactly perfect. Maybe have a look at that instead? I for one do like it when my tax dollars go towards things that are actually useful. Imagine that.

Go on, do something good for the community. Who knows, you may even find you actually enjoy not being awful. It's at least worth trying, just once, don't you think?

cheers

Tully Mansfield

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: Matt Borg
[redacted]

Address:
[redacted]

Kirribilli, NSW
2061

Content:
I think this is a fantastic way to help people commute safely.
I'd love to see a high-quality cycling and walking link connecting Bexley North Train station to Sydney Airport to be funded and delivered as part of the Westconnex project aswell.

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: Aoiffe O'Kelly
[redacted]

Address:
[redacted]

darlington, NSW
2008

Content:
From my review, the research and evidence do not provide a case for this work to go ahead. There is insufficient evidence of any potential benefit to the congestion levels and current difficulty of entering and leaving metro sydney areas. However, the harmful impacts are abundantly clear. This will negatively affect the natural environment (in particular Sydney park which is an invaluable asset to the city), economy of the area, and quality of life for local residents, without providing benefits to commuters. The congestion will simply be moved, not improved. Further thought needs to be given to public transport which is accessible (location and quantity of depots) and affordable and as easy as possible to use (provision of parking, speed of service etc). This would be the only positive way forward for Sydney. If this development goes ahead, I would consider moving away from the area.

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: chris ballard
[redacted]

Address:
[redacted]

manly, NSW
2096

Content:
I do support the WestConnex IF it includes the M5 East Green Link:

Provide a high-quality, low stress, and largely off-road "veloway" connecting south-western Sydney and the CBD, via the airport;
Introduce cycling as a viable transport alternative for Sydney Airport's 29,000 staff, a large proportion of whom are shift workers that have no meaningful transport choice when ending shifts;
Activate the economic return on cycling ($1.43 economic benefit per km ridden);
Allow people to ride and walk safely, wholly away from the road system;
Create road capacity and better Level of Service at intersections for vehicles (fewer people crossing intersections);
Improved safety outcomes for all road, and in particular, vulnerable road users;
Further insulate the Wolli Creek Valley against intrusion by traffic and development by increasing public awareness, use and care of the valley park;
Offset the traffic, social and pollution impacts of the WestConnex project;
Link with the existing M5 Cycleway;
Cater for demand from the housing and commercial developments at Wolli Ck Station precinct.

Personally I think we should be looking at increasing cycling and walking infrastructure to directly combat congestion, obesity, fossil fuel usage and in general the happiness of those willing to make a difference.

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: David MacDonald
[redacted]

Address:
[redacted]

Darlington, NSW
2008

Content:
From my review, the research and evidence do not provide a case for this work to go ahead. There is insufficient evidence of any potential benefit to the congestion levels and current difficulty of entering and leaving metro sydney areas. However, the harmful impacts are abundantly clear. This will negatively affect the natural environment (in particular Sydney park which is an invaluable asset to the city), economy of the area, and quality of life for local residents, without providing benefits to commuters. The congestion will simply be moved, not improved. Further thought needs to be given to public transport which is accessible (location and quantity of depots) and affordable and as easy as possible to use (provision of parking, speed of service etc). This would be the only positive way forward for Sydney.

[redacted]

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Content:
Se file attachment 1

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[redacted]

[redacted]

[redacted]

WESTCONNEX NEW M5 ENVIRONMENTAL IMPACT STATEMENT

SUBMISSION
by
JOHN HYDE

Preamble

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

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

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

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

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

Each contains bolded and italicised comments or recommendations.

My submission ends with a number of Concluding Comments.

1. Objections to process

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2. Objections to WestConnex

2.1 WestConnex is poor strategic policy

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

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

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

WestConnex encourages car dependence and the use of fossil fuels

2.2 WestConnex is an outdated concept and poor planning policy

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

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

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

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

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

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

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

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

2.3 WestConnex is a low priority for Infrastructure Australia

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

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

2.4 WestConnex is not economically viable

Capital costs:

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

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

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

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

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

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

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

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

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

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

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

Recurrent costs:

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

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

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

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

2.5 Stage 3 is unfunded

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

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

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

2.6 WestConnex will distort and undermine state finances

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

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

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

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

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

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

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

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

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

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

2.7 EISs for individual stage are not valid

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

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

2.8 WestConnex is based on dubious traffic projections

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

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

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

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

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

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

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

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

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

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

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

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

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

2.9 WestConnex will not reduce traffic congestion

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

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

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

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

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

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

2.10 WestConnex is <u>not</u> an integrated transport proposal

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

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

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

2.11 WestConnex will not take traffic off surface roads

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

2.12 Who pays for and who benefits from WestConnex?

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

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

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

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

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

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

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

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

So, who is benefiting?

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

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

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

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

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

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

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

3. Alternatives to WestConnex

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

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

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

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

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

4. Specific objections relating to the New M5 EIS

4.1 Visual blight

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

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

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

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

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

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

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

4.2 Expansion of surface road systems

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

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

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

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

4.3 Use of Sydney Park

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

My objections to this proposal are

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

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

Concluding Comments

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

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

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

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

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

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

[redacted]
29 January 2016

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: Catherine Welch
[redacted]

Address:
[redacted]

Sydney, NSW
2015

Content:

Catherine Welch, [redacted] Alexandria 2015, catherine.welch@sydney.edu.au
I wish to object in the strongest possible terms to the New M5 proposal. The EIS shows how flawed and distastrous a project this will be for my local community, for Sydney and for NSW, which will be paying for it for many years to come. I object to the proposal as a resident of an affected community, as a taxpayer of the state, and as a citizen of a democracy who is entitled to a greater opportunity to meaningful consultation and to transparency in decision-making.
I object to a project which does not provide sufficient benefits, and which exacts immense costs, even according to the numbers manufactured for the EIS. These costs are:
- Increased congestion in an area already affected by gridlock, leading to rat runs in local streets - as well as cancelling any of the time savings claimed for the project. According to the number in the EIS, Euston Rd will have to carry more traffic per day than the new M5 itself.
- Sydney Park will no longer be the green `lung' and haven for thousands of people in a high-density area (and that will only become higher density over time), with few public spaces. Instead, it will be trimmed, and hemmed in by polluting roads on all sides. The location of the new public space - right next to a massive flyover - means it is no compensation for this loss.
- The scope of the traffic study does not consider full impact on my suburb - the only answer that SMC has been able to give us (via the City of Sydney) is that beyond Maddox St, the traffic will `disperse'. This is clearly inadequate - in fact, it is laughable.
- Alexandria businesses are not included in economic impact statement - King St and Enmore Rd are not the only affected retail businesses
- The pollution levels to which Alexandria residents are currently exposed are already above national guidelines, and the EIS shows this will worsen.
- There are serious omissions/contradictions in the EIS relating to Alexandria traffic - diagrams don't match the text in relation to crucial intersections. Ashmore, Green Square, C2Eveleigh, Waterloo and ATP need to be explicitly addressed but are not. To take Mitchell Rd as an example: it will have the expanded ATP at one end (the north) and the large-scale Ashmore development at the other (south) end - and this is before factoring in the additional traffic coming off the new M5 and streaming on to Sydney Park Rd. There is no evidence in the EIS that these additional developments have been modelled and their impact assessed.
- There is insufficient consideration of alternatives to this project that would not have such a deleterious impact on the local area - and that would alleviate current congestion rather than adding to it.
- The social impact study shows that this project violates the vision that City of Sydney residents have for their city. There is no consideration of this, yet it is clear from the EIS itself that the project does not meet community standards and aspirations
The standard of the EIS is so poor that we cannot effectively judge the full impact of the project on our local area.
However, what we can judge is that the EIS makes it clear that the current project will create traffic levels that are unmanageable. I enclose an email we received from SMC explaining why 2031 figures for the project have been omitted from the EIS (a very serious omission) (email from Louise Bonny, dated 13 January 2016):

[start of quote] '> 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.

> It is further noted that by 2031 without the project, the intersection Level of Service in the pm peak is expected to be very poor (table 100).
>
> 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.' [end quote]

In other words, the effect of the project on local roads is so bad that it actually means the project will fail to meet its objectives due to the increased congestion that it will cause.

I also strongly object to the breach of process that has occurred as part of the EIS `consultation' period. In particular:
- Lack of independence: given that previous Sydney tollways have failed to reach the targeted benefits, and given that the consultant (AECOM) has been found to have used flawed methodologies in the past) there is particular onus on this one for the projected benefits to be subjected to independent scrutiny. This has not occurred and it means that there has been no opportunity for independent experts to assess AECOM's methodology.
- Timing: the release of the EIS over the summer holidays is a move that is cynical in the extreme. It means that only now is my local community of Alexandria starting to become aware of the issues surrounding the project. Some affected parts of the community - particularly Alexandria Park Community School, which is explicitly mentioned in the EIS as one of affected the affected schools - have not been able to comment, given that the consultation period coincided with school holidays. It also meant that we did not receive answers from SMC in a timely manner, making it more difficult to prepare a submission. (We still have numerously unanswered queries awaiting a response.)
- Short time period for comment: I was part of a small group who went through the EIS to try to understand what the effects would be on Alexandria. We have been unable to properly read and absorb the information in all the volumes in the time we have been given. Given the complexity of the project and the size of the EIS, there has been no way that local communities can have been meaningfully consulted.

I demand a response to this submission and a point-by-point reply to the concerns raised. I am still awaiting any acknowledgement of my submission regarding the M4 EIS: another breach of process.

Yours sincerely
Catherine Welch

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: Sharon Laura
[redacted]

Address:
[redacted]

Haberfield, NSW
2045

Content:
Attn: Secretary, re: WestConnex New M5 EIS, project number SSI 14_6788
Submission to WestConnex New M5 EIS, project number SSI 14_6788

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).

I object to the proposed WestConnex new M5 motorway. It is not a solution to Sydney's transport problems. It will induce more cars onto our roads and create local traffic jams and more traffic pollution. This pollution will greatly increase toxic ultrafine particulate matter into the Greater Sydney Metropolitan air shed.

Community consultation during the exhibition period of the M5 EIS has been a sham and insult. Nothing but a PR tick and flick exercise. The employment of contract/casual workers at so called information booths and sessions was a disgrace. The NSW Department of Planning should demand better standards, and actually monitor the quality of information and engagement being delivered and served up as community consultation. All too often, at `information kiosks', these contract workers barely knew local streets or any real detail about this project (other than PR spin), a most frustrating experience for all, - but worse, a perversion of proper community engagement and planning in NSW. I hope that the Planning Department will provide advice to the Minister so that in the future there is substance - not just an appearance of community consultation during future EIS exhibitions. I request that the Department of Planning not now accept the M5 proponents version of what has been delivered to the community. But actually listen to community feed back and challenge the spin of the proponent's communication team. I believe that the EIS process for the M5 was so flawed it should not stand as having been delivered and should be re- started.

I also object to the fact that the NSW government is attempting to avoid scrutiny by transferring responsibility for this project from a government body, the WestConnex Delivery Authority, to a privately run government company - being the Sydney Motorway Corporation. The Sydney Motorway Corporation is not a public body. It is appalling that public money is being used by a private company that does not have to publish contracts or provide full information to the people of NSW, - prior to building such massive road infrastructure. I object that a "public company" has been set up to deliver a road project that will not deliver on it's promise to solve Sydney's transport problems.

The fact that the NSW Government has already signed multi-billion dollar contracts for WestConnex before the M5 EIS was placed on public exhibition totally destroys my confidence that this is a genuine EIS consultation process, or that the planning system in NSW has not been thoroughly corrupted by special interest groups.

I object to the fact that accountability for contracts already signed is avoided, by "commercial in confidence" rhetoric. It is only right that contracts entered into by the NSW government, on behalf of the public be gazetted and terms and conditions disclosed so that

the public understand what agreements have been entered into in our name.

Global experience and research has shown conclusively that these kinds of toll road mega-projects are hugely expensive and provide only short-term relief from traffic congestion. I have yet to hear of an independent transport expert who backs the project. WestConnex will increase air pollution and traffic, and expose NSW taxpayers to unacceptably high levels of financial risk. Even the EISs produced for the various stages of WestConnex show it is not a long-term solution to Sydney's congestion problem.

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.

Fundamentally flawed projects like WestConnex do not account for changing work practices supported by technologies such as teleworking, or flexible office spaces, or that car journeys are dropping as workers elect to work closer to home or use public transport, bicycles or car sharing. It also does not account for trends that will substantially change how people choose to travel in future and reduce the number of cars on the road, such as peak car or driverless cars.

WestConnex comes at not only a huge cost that is blowing out at the rate of over $2 billion a year. It also comes with a massive opportunity cost. The $16.8 billion and rising that would be spent on WestConnex is money that would be taken away from hospitals, schools, regional roads, and the public transport improvements that are urgently needed - not just in western Sydney, but many parts of regional NSW. If this $16.8 billion was spent on public transport and effective road management, a project like WestConnex would not be necessary.

I also strongly object to a number of specific aspects of this EIS, and I expect you to publish this submission and send me a written response to each of the objections I have outlined below.

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.

Traffic on the existing M5 East exceeded capacity "within months" of opening (New M5 Project Overview, November 2015), including recent road widening. This lack of capacity is, in part, the rationale for the construction of the New M5. Managing demand on the M5 East and providing high quality public transport alternatives for those who can change mode would be a more effective long term solution that simply a `predict and provide' approach, yet this alternative - along with many others - has not been assessed.

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.

Heritage buildings would be destroyed for this project, while others would be isolated in a flood of traffic. e.g. terraces next to construction compounds and motorway in Campbell Street.

Residents in south west Sydney will suffer a huge loss of amenity as a result of the existing M5 being stripped of its green space and vegetation, particularly when residents fought so hard to get these green spaces established and thriving. I also strongly object to their concrete noise walls being replaced with transparent barriers. These will be right next to hundreds of homes, who will now be forced to look at (as well as listen to and breathe the fumes of) lanes of motorway traffic just over their fences. It is utterly unacceptable to prioritise the views of passing motorists over the privacy and amenity of people who live in an area.

This EIS fails to model traffic beyond two intersections after this project. This deliberately obscures the threat to King Street and

roads in Alexandria. I object to exposing King Street and Edgeware Rd to the threat of becoming clearways.

Residents affected by compulsory acquisitions are being offered below-market prices for their homes and businesses, which has caused additional and completely unnecessary distress and trauma for the owners. I find it disturbing that the NSW Government was warned three years ago that the compulsory acquisition process was unfair to those whose properties were being forcibly taken, yet has both failed to make the changes recommended and actively suppressed the report that handed down these findings.

I strongly object to 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; 24/7 construction noise, vibration, and heavy truck movements; exposure to asbestos, construction dust, and toxic materials; and more. Mitigation is recommended in this EIS, but no information is provided about who might receive this 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.

Billions of dollars of construction contracts have been let for this project before this EIS was lodged. This casts huge doubts on the legitimacy of the community consultation process, and places unreasonable pressure on the Dept of Planning and Environment to approve this project regardless of its flaws.

This project deliberately exposes communities in certain areas to increased pollution. Such an approach values the health and safety of people in certain areas of Sydney over others, and is both unjust and unacceptable. In addition, despite there being no safe level of exposure to fine particulate matter, the proponents want to build this project knowing it will increase these pollutants around much of the project route.

Scientific experts agree there is no safe level of fine particle pollution. Rather than aiming to shift dangerous pollution from area to another, the government should be finding cleaner transport solutions that do not leave residents living beside polluted roads or unfiltered pollution stacks - no matter where they live.

The air quality study shows that dangerous fine particle pollution already exceeds acceptable levels in some areas in the project areas, and will worsen if this project is built. I also object to the way this and other information about air quality and pollution impacts has been provided in this EIS; it is far too dense and opaque for ordinary residents to understand. It should go without saying that where public health is concerned, information about negative impacts should be provided in a way that affected residents can understand.

The EIS demonstrates that air quality, even at existing levels, is close to the allowable limits, and will only get worse with a major interchange, road upgrades and ventilation stacks implemented at the St Peters Interchange and surrounds. If new air quality standards as proposed by the Council of Australian Governments (COAG) in 2012 are implemented, the New M5 would well exceed allowable air pollution levels.

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 in Brisbane). I find it completely unacceptable that AECOM has been paid $13 million of taxpayer money to complete this EIS despite this, and despite it being awarded other WestConnex contracts that depend on the project going ahead. This is an utterly unacceptable conflict of interest. The public cannot trust that this EIS properly and fully investigates the true economic, environmental and social impacts of this project, and indeed the poor quality of this document reflects this. I also object to AECOM doing the EIS when it has contracts in the rest of the project including Stage 2. This conflict of interest needs to be explained and addressed.

Even with these flaws, tolls on these roads are to be in effect for decades. Many Sydneysiders will not see these roads untolled in their lifetimes. Nor will western Sydney or rural and regional NSW see any investment in their communities to create employment opportunities that would circumvent the need to commute long distances by car to jobs in Sydney's CBD, eastern suburbs and inner city.

The New M5 would cause costly traffic chaos throughout the inner west and south-west Sydney. 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. This EIS also clearly demonstrates that the traffic on roads around the St Peters Interchange will deteriorate as a result of WestConnex, as well as already heavily congested roads in Bexley, Rockdale, Kingsgrove and Brighton-Le-Sands. I object to building a road that the proponent admits will produce such volumes of traffic that such roads will be beyond capacity. Where traffic is already bad, plans should be to reduce it, not make it worse.

Meanwhile, even this EIS projects that the existing M5 and New M5 combined will end up taking less traffic now than the Cross City Tunnel, which was a financial disaster. This is because even the proponents know that commuters will be unwilling to pay $6 each way to use either of these toll roads, which is in line with figures in WestConnex's Updated Strategic Business Case that show for almost all of potential users, the value of time saved is less than the cost of using WestConnex.

What is even more worrying is that the proponent now concedes that it cannot make its traffic model work without other, unfunded toll road projects. What happens if or when these projects do not proceed? This EIS does not say, so the public does not have a chance to form a view or comment.

The delivery of the New M5 and in particular the St Peters Interchange, will have a significant impact on residents and businesses. The increased traffic resulting from this project will impact on urban amenity and will limit the ability for public transport services to operate efficiently due to increased local road congestion.

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 analysis of alternatives provided by AECOM in this EIS provides no solid evidence for the conclusions drawn. A combination of demand management of traffic and new public transport projects, especially for western Sydney, should have been explored. This is just one of many potential alternatives that could have provided more effective, sustainable and cost-effective ways of easing congestion that AECOM has failed to analyse.

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.

In addition, 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.

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.

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 City's view is that 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.

Endangered flora and fauna would be destroyed for this project, including the Green and Golden Bell Frog colony at Arncliffe and the critically endangered Cooks River Castlereagh Ironbark Forest at Kingsgrove/Beverly Hills. Saving these species in particular was a condition of the previous M5 motorway; destroying them now makes a mockery of these legal protections. I also object to the unprofessional analysis of the threat posed by the New M5 to these species and to biodiversity in general, as this section of the EIS attempts to downplay the significance of the flora and fauna threatened by this project and the impact of this project on biodiversity overall.

I am also concerned that the EIS suggests that the breeding ponds of the Green and Golden Bell Frog have not been kept healthy in recent years, especially since the RMS was responsible for building these ponds as a condition of the old M5.

Many public parks would be temporarily or permanently destroyed for this project, including parts of Sydney Park and the M5 Linear Park, along with thousands of mature trees along the route. Even if these trees would be reinstated, it will take decades to achieve the level of canopy that exists.

The project's proponents have misled the public about its plan to take 14,000 square metres of Sydney Park. For months it said it would only take 8,000 square metres, leaving it until the EIS was lodged to inform the Council that it planned to forcibly acquire the rest. This will diminish the enjoyment of the park in many ways. Peaceful paths, exercise equipment, children's play areas and sporting grounds, and more will all be adjacent to a major highway. This is completely unacceptable.

The increase in road capacity on Euston Road from four lanes to between six and eight, and Campbell Road from two lanes to six will have noise impacts on people living in the area and using Sydney Park.

There is already flooding at St Peters during heavy rainfalls. Councils have already found that the flooding modelling is not acceptable for the M4 East and the same approach has been used for the New M5.

The planning processes surrounding this project and WestConnex as a whole have been utterly corrupted. For example, key parts of the business case remain hidden from public scrutiny, even though it is being funded by taxpayer money. Homes and businesses are being forcibly acquired, multi-million and/or billion-dollar contracts have been let, and construction works have occurred place before any planning approvals are granted for this project. The entire WestConnex, including this project, has been characterised by poor governance, and a complete lack of transparency and accountability. Community consultation has also taken place only after detailed plans have been drawn up, so the general public has little to no input on a project that will affect hundreds of thousands of people's lives for many years to come.

The proponents have failed to consult with local businesses across the route, many of which would be destroyed by the traffic and/or construction impacts of this project.

The proponent has failed to adequately assess and responsibly handle asbestos, including the huge amounts it has removed ahead of this EIS from the Alexandria Landfill and transported through inner Sydney out to the western suburbs. More toxic asbestos is expected to be dug up and transported from various sites along the New M5 for this project, and the numerous

breaches of basic health and safety procedures observed by residents in St Peters, Granville and Erskine Park in this regard have not been properly assessed in this EIS.

I therefore ask that you reject this proposal, publish my name and submission in accordance with the undertaking on your website, and provide a written response to each of the objections I have raised.

Yours sincerely,
Sharon Laura
Sydney NSW 2045, Australia

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Content:

The release of the M5 EIS is yet another long-winded set of reports that offers no solutions, and does not answer the myriad of concerns that have been posed by the public. While questions ranging from environmental concerns, to traffic concerns, to amenity, to health effects continue to rage, again we are left with no real answers. The festooning of banners across the website and in community consultation forums is given more attention than genuine answers to people's questions. The repeated information of what the Westconnex `will do' has all been heard. The challenges of what it won't do, or the undesirable aspects of the `will do', are, yet again, shrouded in mystery and left for guesswork. Meanwhile, independent investigations that speak of the horrors of the true effects are denied, yet with no evidence to provide a believable alternative. The new M5 submission indeed has many points of concern. I outline them below.

Failure to fulfil its own goal:

Westconnex authorities have consistently stated that the goal of the project is to provide a route from the West to Port Botany and the airport. However the integral route for this to occur is Stage 3 of the project. This remain to date, unplanned and unfunded. It is forecasted that by Westconnex Authorities themselves that Phase 3 must be completed in order to see the benefits of the project.

We are currently standing at an obscene amount of public money for the funding of Westconnex Stages 1 and 2. It is estimated that every kilometre is costing $500 million. With Stage 3 as the key link between Stages 1 and 2, there is serious and valid concern that the Westconnex project will not only fail to meet public demand for transport needs, but fail to meet its own stated objective. As one of the largest infrastructure projects in the country, it is staggering to think that the key part of it remains so dubious, both financially and ideologically. State Government cannot expect that the public will simply `trust' that the Government will be able to complete this direful project, when we have no evidence that the Government itself can even assess its financial viability.

Traffic issues and lack of public transport:

Westconnex remains, in its current form, a project with deeply adverse and far-reaching effects. The claims to benefit people from Western Sydney remain unfounded and based on inaccurate information that claims that such transit is desired in a car, as opposed to increasing and improving the public transport system. The City of Sydney funded and independent SGS Economics and Planning report (2015) has given evidence to demonstrate that around 90% of people from the West and South-West travel to the CBD on public transport. This very clearly shows where demand lies; in public transport. Not roads.

If the State invested its current estimated 16.8 billion dollars into public transport instead of an old-fashioned and unnecessary motorway, Sydney and its wider connections could experience a world class integrated transport system and more. Instead, we are left to debate the merits of a highly expensive, 33 km concrete slab that will fill our city with cars and pollution, and that will funnel traffic into already congested suburbs around the inner city. Increasing Euston Road and Campbell Road to major six-lane highways will funnel an extra 45,000 cars across the inner west roads. It will clog up Sydney Park with car congestion, and strangle surrounding areas of Alexandria, Erskineville, Green Square and Redfern with fumes.

The city will not cope with the increased traffic. It is already in dire need of relief. The only thing that will relieve this situation is a fully integrated public transport system that is easy to use and dependable. This will increase the use of public transport and will take drivers off the road, leaving current roads sufficient for those who need to drive, and for trucks that must go by road. Not only this, but in keeping with the notion of Sydney as an international city, and as the EIS states, the "vision for Sydney as a strong global city and the nation's economic and financial powerhouse...the need to improve access to major employment hubs and global getaways" (https://majorprojects.affinitylive.com/public/0a1b66c3f633f114865653bc3bbfa48f/New%20M5%20EIS_Vol%201A.pdf p ii), we have no choice but to invest heavily into public transport. Currently, we are investing heavily in Westconnex. Global cities, including New York, London, Paris, Berlin, Tokyo and Singapore, have demonstrated that integrated public transport networks are what is needed, through their own investments into public transport. Public transport enables mobility for most, including residents and visitors alike, and enables cities to operate efficiently, and in an environmentally sustainable way. Westconnex is expensive not only to the government, but will be costly to the public who use it. It stands to benefit private vested interests, while our communities and environment choke on the ineffable fumes that this project will create. The new report states of the St Peters public transport, that "six PM peak services are forecast to experience a travel time improvement of approximately 20 percent or better... when compared to a future scenario with no project" (ix).

Leaving aside the independent research which states that traffic will increase, and thus affect public transport adversely as well, the public response has not been to `do nothing', rather, to re-circulate this exorbitant amount of money into public transport. For even half of $16.8 billion dollars injected into public transport directly, we could do a lot better than 20 per cent. Considering the amount of money, these statistics for public transport improvements are trifling. Indeed, considering the amount of money that the project calls for, it would be an embarrassing financial blunder for the Government to persist with this project at all.

St Peters

The government is well aware of the transformation that has taken place from industrial to residential, in and around the St Peters area, including areas such as Alexandria and down to Green Square. Selecting the site of St Peters on the basis that it is "an industrialised area" is inaccurate to its current use, and ignores the current reality of it situation. It offers no real understanding of the transformation of the area, and likewise, of residents' concerns.

Green Square

Whilst Westconnex Delivery Authority advisors insist that the motorway will not act as a route into the heart of the city, the analysis of exits leave no other explanation except for this. We have been given no modelling to show the effects that Westconnex will have on Green Square; a $13 billion project for urban transformation, expected to have a population of 61,000 by 2030. This is one of the largest transformation projects happening in Australia, and yet with the Westconnex looming up the side of it, there is no information about the impacts it will have.

This area of significant investment that will be entombed by the motorway is in dire need of public transport. The system is already overburdened and the streets beating with daily traffic. With the huge injection of people into the area, the motorway will compromise the liveability around Green Square. This lack of foresight is appalling and shows a completely incompetent style of governance.

Sydney Park

In recognising the increasingly dense living area around the city south, the City of Sydney Council committed to the remediation of over 40 hectares of grassland, known as Sydney Park. The community's response has been highly praising, earning 4.5 out of 5 stars on TripAdvisor (https://www.tripadvisor.com.au/Attraction_Review-g1165139-d2226311-Reviews-Sydney_Park-St_Peters_New_South_Wales.html#REVIEWS). This space is a welcome addition to the highly urbanised space that surrounds it, and so has been revered by the community. The concrete slabs of Westconnex encroaching onto the Park will be repugnant, and now the Westconnex project is demanding more land. The loss of 350 trees to facilitate the spaghetti junction of St Peters demonstrates how out of touch the government is with communities.

The recent removal of the Alison Road fig trees, opposed by the local council, has sparked great levels of community outrage. These aesthetically rich, strong, old and canopy-providing trees were forfeited for the interests of the Australian Turf Club. Now, again, the government is prioritising private and vested interests at the expense of communities and the environment. This affirms that community consultation is not in State Government's interest, and merely a tokenistic attempt to push forward with their own agenda, no matter the consequences.

Sydney Park has not only preserved historical landmarks and integrated them artistically into the natural landscape, it has also won a Green Flag award; an international award recognising its accomplishment. It is publicly revered, and the interference of it by a publically loathed project such as the Westconnex is bound to only further aggravate an already irked community. It again shows that State Government will willingly trump the efforts of local council in their efforts for sustainability, in the interest of privatised

interests, whilst polluting public lands. This is a shameful and reprehensible act. This monstrous motorway must never be favoured over our environment, particularly on this scale. Further, while there are promises for offsets, and to return the land that is ripping through trees and upsetting the newly formed bicycle path, there will be great loss. Once used and spat back out by the Westconnex project, any returned land will be practically unusable, due to downgraded air quality, safety concerns, and noise levels from nearby cars and trucks.

King Street

The impacts of the St Peters interchange and its associated pavements will have an irreversible impact on King Street Newtown. Concerns for this very unique and culturally significant shopping strip have been recognised by the government in statement, however there has been no change in action and no reversing of the route. This will see cars pile onto the currently already congested King street, likely turning it into a clearway. As Council has been encouraging a cycle network to combat the amount of cars, Westconnex is now threatening to tumble into the area, clumsily overrunning the growing use of bicycles. This is not in the interest of the community. Cars must be directed away from this area, not be given the incentive to drive straight into the heart of it. This will be disastrous for the area, and change its foundations amidst the current threats that are already plaguing the area, to lose its historical connection to the LGBTIQ community of Sydney.

Consultation

Again, whilst this report celebrates its extensive consultation process, it is obvious that state government has, from the beginning of this project, been uncommitted to genuine consultation. Leaving aside some very bleak independent reports, such as the City of Sydney funded SGS report, the community response against Westconnex has been substantial and constant. Community events and information sessions (that the report holds up as part of an apparent extensive consultation process) lack in sincerity, and are not earnest in their attempts to listen to community concerns. They are designed instead, to promote Westconnex. This is largely apparent with how long it has taken to produce a business case, a staple document that is needed to assess the merit of the project against the cost involved. Deals were signed long before its release, with construction works underway in the midst of ambiguous and secretive multi-billion dollar project.

There have been many media reports on communities who will be affected, if not through the severing of their local neighbourhood, then by compulsory acquisition of homes. Recent reports of people being underpaid for these compulsory acquisitions are draconian governmental measures, and very clearly demonstrate the government's dismay for public interest. The public has no reason to trust in the genuineness of the Westconnex consultation process from the process to date.

Consultation with local government has been just as dubious. When the City of Sydney Councillors enquired about the researched impacts of what would occur to the highly invested area of Green Square, consultants had no answer. The representatives spoke in contrast to the large model on display, which demonstrated exits that would funnel out onto neighbourhood areas and the city centre. Despite this, representatives maintained their mandated script that Westconnex is not a motorway to bring cars into the city. Councillors and staff were told recently that the project would include one year of monitoring intersections and changes, after which changes can be made if needed. If Westconnex were to properly consult with the City of Sydney Council, and engage with the independent set reports that highlight its faults, there would be no likely changes needed. This predicts further costs and a severe and concerning lack of research, which the Westconnex Authority is willing to act first and change later.

Holistic costs

Financial:
Leaving aside the astronomical cost of $16.8 billion and more, Westconnex will be a highly expensive tollway. This demonstrates that it is not there to serve the interests of even the average-income earners of Western Sydney. At an estimated $26 a day to travel upon this monstrosity, a five-day-a -week commute would cost around $6000 per year. This could not possibly be in the public's benefit, and highlights exactly what group this project is meant to benefit - the vested, privatised interests who will gain an extraordinary amount of wealth from this deplorable motorway.

Environmental:
Whilst the financial cost is obviously disastrous, what remains obscure is the environmental cost. The public have been given no indication of the environmental costs of Westconnex, in its entirety. For one of the largest projects that Australia has seen, this is an incomprehensible fact, and deserves scrutiny by the Auditor General and Independent analysis.

The EIS document has not provided sufficient analysis on species impact. City of Sydney research has found 64 different species inhabiting the land in Sydney Park. The EIS has not identified, let alone researched the impacts into these species, whose homes will be affected in the acquisition of the park and nearby areas. There must be an outline for how this will be managed, and how the environment of these species can be protected and their healthy survival ensured.

Air quality of course, is of dire concern. Whilst the EIS focuses on its faultless air ventilating systems, it does nothing to qualm community concerns over the particulate matters from trucks as they pour through neighbourhoods.

Social:
Neighbourhoods and communities will be the stakeholders who suffer the most. In advertisements that hold up Westconnex as some sort of transport saviour for Sydney, there are disturbing consequences forecasted by independent studies (such as the SGS report and many media reports), that indicate the loss of amenity will be substantial. Westconnex will demand, for example, a large bite of Sydney Park, as discussed above. This is a huge community loss as well as an environmental one. Any land returned to Council will be unusable due to the fumes that Westconnex will bring to the corners of the Park, worsened by the removal of the

trees. Noise ramifications have not been given any significant consideration for people living around Euston and Campbell Road, nor for the many people who frequent Sydney Park.
The effects on communities have not been appropriately considered, given the EIS' own forecast that toll roads will push cars onto neighbourhood streets. This will increase safety hazards as well as pollution, noise and lower general amenity and the ability walk and use bicycles.

Due to the issues raised, and the considerable community objections against many facets of the Westconnex project, I request that you halt all work on Westconnex. I request that you reconsider the benefits of a fully integrated public transport system, and that Westconnex funding be redirected to this and to other publicly beneficial services.

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[redacted]

[redacted]

[redacted]

[redacted]

Name: Elissa Bishop
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Address:
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St Peters, NSW
2044

Content:
Attachment in PDF

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

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

To the Minister for Planning

As residents of 9 Brown Street, St Peters since 2012 we strongly object to the entire WestConnex Project and ask you to reject the project on the basis of the inadequate Environmental Impact Statement and overall impact this project will have on the residences surrounding the M4 and M5 extension and St Peters Interchange. We are disappointed at the scale of the Project with the St Peters Interchange and Campbell Road upgrade being a huge monolith that will scar our neighbourhood aseptically and put hundred of thousands more cars and trucks each day onto local residential roads.

We do not feel that our rights are being considered and protected in regards to the predicted noise, aesthetics and pollution levels associated with the construction and operation of the WestConnex Project - M5 East St Peters Interchange and Campbell Street improvement. We purchased our first home at 9 Brown Street in 2012 and were excited about the prospect of living in a community with kids playing in the street and close to schools are activities. This response will consider specifically the St Peters Interchange and Campbell Street improvement due to our close proximity to Campbell Street. We have put in submissions opposing the entire WestConnex M4/M5 extensions.

We are extremely concerned about the impacts the project will have on our young family, with two children under 3 and the surrounding community. This includes local schools, parks and recreation facilities. We also have concerns that the EIS and project does not adequately cover the broader context of all likely affects on our home. We will be affected by a myriad of impacts at the same time including noise, dust, visual amenity, light pollution, additional traffic and gridlock. In addition we feel that our home has been markedly devalued as a result of this project.

NOISE

Concern: Overall Noise Levels

The EIS covers noise in a level of detail in Appendix J. It is of a high technical level and a failing of the EIS is the inability of the layperson to be able to interpret and make an accurate assessment of the impact of the road changes on their individual homes and families.

The predicted noise levels set out in Appendix J of the EIS are above the RMS Noise Mitigation Guide (NMG) 'acceptable criteria'. Our home is considered in *Table 6.1.10 Noise sensitive receivers eligible for consideration of additional noise mitigation*.

ID	Address	Use/Road category	$L_{Aeq(9hour)}$ noise level dB(A)		Change in noise level dB(A)
			No Build	Build	
3829	83 Church Street St Peters	Residential New	55	62	7.4
3831	9 Brown Street St Peters	Residential New	53	62	8.7

The data above from Table 6.1.10 appears to be based on 2022 modelling. This puts us within the acute noise levels for night time. Acute level is 60dB(A) for 7pm-7am and 65dB(A) for daytime based on data from the RMS Noise Mitigation Guide (NMG). The change in noise level is substantial and will be noticeable around our home and community.

This puts us well above the World Health Organisation guidelines as stated in the RMS NMG. *Facade noise levels of 50dBA day and 45dBA night are considered representative of the World Health Organisation (WHO) Guidelines for Community Noise (1999) for outdoor areas and the WHO Night Noise Guidelines for Europe (2009) threshold levels.*

This causes serious concerns for the impacts on our home and our young children. The ability to live comfortably within our home without the annoyance of traffic is vital to us and the ability to utilise our outdoor space is also a matter to be considered. It has been well studied the negative effects of noise on personal well being and the overall community.

Concern: Noise Monitoring Data

In regards to the actual monitoring data utilised by AECOM in the EIS, the noise monitoring stations were set up in a location away form our residence and may not have fully considered the impacts of the Campbell Road improvements on our actual home - both inside and outside. In addition, when you consider the ambient noise measurements set our in Appendix J Table 13 - the NL02 results (closest monitoring point) shows the rating of the Day at 50, Evening 46 and Night 39. Your modelling shows our base with no build at 53dB(A). If we were to take the monitoring data from NL02 LAeq, 9 hour compare this to the modelling table in 6.1.10 we are already above the level that the modelling suggested in Table 6.1.10.

Table 13 Ambient noise measurements

Noise logging location	Rating background level, dB(A)			Ambient L_{Aeq} noise level, dB(A)		
	Day (7am to 6pm) $L_{A90,15\ minute}$	Evening (6pm to 10pm) $L_{A90,15\ minute}$	Night (10pm to 7am) $L_{A90,15\ minute}$	Day (7am to 6pm) $L_{Aeq,15\ hour}$	Evening (6pm to 10pm) $L_{Aeq,4\ hour}$	Night (10pm to 7am) $L_{Aeq,9\ hour}$
NL01	57	51	40	67	63	62
NL02	50	46	39	68	65	63
NL03	54	45	40	68	65	61

The report details that we will be exposed to levels above the acceptable criteria and the key mitigating measures to bring the levels of noise down are at the operational stage only. The only measure that has been proposed is the installation of architectural solutions. This is inadequate will not address the increased changes in noise to our residence that the project will result in.

Concern: Noise Monitoring Data Limitations

The M5 EIS fails to sufficiently detail the dates that this study was done e.g. relevant to limitations with variations in traffic seen throughout the calendar year e.g. holidays, variations in other cumulative factors such as airport noise & wind at the time of logging.

In terms of effect on wind on the results the report failed to establish a reasonable attempt to obtain wind data. Rather than use the wind data from the airport which is “appreciably effected by wind” a subjective call was made to use a station at Canterbury. The use of such a point is not representative of monitoring points in St Peters. I am also concerned that wind data appears to be collected at the project monitoring station on the corner of Campbell and Princess Highway. Climatic monitoring clearly visible on the structure. Yet such data was not used, nor were any

attempts to put inlace any climatic monitoring that would be more representative to the (relatively low number of) baseline monitoring points.

The exclusion of “extraneous wind and rain” also biases results with both wind and rain having a strong influence on observed sound. As examples

- Low cloud cover associated with has an echoing effect on sound (increasing observed levels).
- Wind can either increase or decrease observed levels dependant on direction at the time of logging.

> *M5 EIS- The Sydney Airport wind data was appreciably affected by wind, which was not considered to be characteristic of the St Peters area. On this basis, Canterbury weather data was used when considering the logger data. Periods which were affected by noise from extraneous wind and rain were omitted from the results.*
>
> **How many days did the study take into account to come up with the base line data?**
> It is well recognised that taking limited numbers & occurrences of samples results in statistically invalid results. If the data is limited as it appears to be this should be noted in the limitations of the study.
>
> “In addition, logging was repeated at two locations during July/August/September 2015 due to earlier equipment failures”. The lack of detail surrounding this issue does not assure the reader that there was justification to discount the results for two locations.
>
> **Current night time curfews on roads intersecting residential areas**
> Importantly the night time measurements do not make any reference to current night time (after 10pm) curfews for heavy vehicles on Campbell Street. Ie restricting the use of the road by heavy vehicles on roads such as Campbell Street (results graphed earlier in this section of the EIS for Campbell Street, so one can assume that one of these unidentified sample points represents such a scenario). Failing to take into account current curfews in the monitoring should be detailed as a limitation of the modelling - particularly if such curfews are potentially lifted. This highlights another deficiency in the EIS - there appears to be no reference to the future of current curfews which effectively impose respite periods for local residents from heavy traffic.
>
> Is it proposed that these curfews remain in place? if not wouldn't the EIS be the spot to detail proposals to lift the current noise pollution controls?

<u>Concern: Ambient noise monitoring and deficiencies/limitations in the modelling</u>

We have concerns that the M5 EIS fails to to adequately detail limitations & uncertainties with the baseline data & subsequent (attempts at) modelling the levels of sound during construction and during operation of the proposal. Noting such limitations and uncertainties is an accepted requirement in reporting ‘scientific data’ such as baseline noise assessments & modelling.

The RMS “Noise Mitigation Guideline” Section, 5.5 Design, reiterates such needs “*Any limitations and modelling uncertainty in the EIA reports should be documented in the technical report”.*

If this information is not accurate at the time of the Final EIS, critical irreversible decisions will be made that do not allow for future adjustments once the road is commissioned and further mitigation measures required. For Example: Failing to allow enough corridor space may result in a lack of buffer zone space to implement important mitigation options including noise barriers and in designing adequate corridor size to allow for one of the biggest influencing factors used in modelling- noise attenuation over distance. Highly effective mitigating measure.

Concern: lack of independent review of noise measurements, modelling and proposed mitigation measures

As documented in the RMS - Noise mitigation guideline

> "*Expert opinion in each particular area is helpful and for contentious locations the views of an independent expert are highly recommended. Quantitative information such as wind loading calculations, diagrams of site access, soil conditions, etc are needed to provide an objective basis."*

The M5/ St Peters Interchange/Campbell Road widening is a contentious project with high media coverage. The location of the projects mean a very high numbers of the public effected by the increased levels of noise pollution.

The EIS Noise Component should be independently peer reviewed by technical experts to ensure the information, assumptions and data is accurate and considers all impacts of the project.

Concern: Noise Mitigation Measures - Operational

We have concerns from the EIS in regards to the nose mitigation measures that have been considered but neither proposed not finalised. "*When designing noise mitigation, the target noise level is the lowest applicable noise criterion or controlling criterion, however it may not be feasible and reasonable to achieve these levels".*

> *Under the RMS Noise Mitigation Guidelines the principles to determine if noise mitigation is feasible and reasonable are:*
> *1. Communities should receive reasonable and equitable outcomes*
> *2. Noise mitigation should be designed to reduce noise levels to the criteria at qualifying receivers*
> ***3. Priority should be first given to reducing noise during corridor planning and road design where there may be greater opportunity to provide cost effective and integrated outcomes with better urban design***
> *4. Following corridor and road design residual exceedences of noise criteria may be addressed at qualifying receivers using in order of preference (RMS Road Noise Policy Section 3.4.1) quieter road surfaces, barriers and at-property treatments*
> *5. Incidental benefits from the noise mitigation designed for qualifying receivers should be recognised at all receivers within a community where noise levels exceed WHO guidelines*
>
> In the EIS it was document that *'A noise barrier was initially considered to the south of the proposed alignment. As access to properties and existing roads would need to be maintained, it would not be feasible to build noise barriers to mitigate the noise impacts.* ***It was also not considered reasonable to build a noise barrier to the north of Campbell Street due to visual amenity and other urban design aspects'.***

The EIS considers the RMS Noise Mitigation Guidelines Hierarchy of Controls for noise mitigation but does not activate the top order of quieter pavements, noise barriers, noise walls. The EIS seems to consider the last control options - at property treatment- as the only options. Why have the earlier options and the recommendations from the RMS website of control measures at source e.g. road surface, barriers and mounds not been **considered reasonable**? What are **other design aspects** that prevent at road mitigation and screening? The EIS does not adequately justify why these options were not considered. Stating that because the traffic is slow road (50km/hr) options are not suitable with no references.

There is a requirement in the RMS document to JUSTIFY all decisions and why the primary options were not considered. We do not feel that one sentence is adequate for a project of this size

and scope, nor just for our residences. This is a failing of the EIS and ultimately will impact on our residence, the community we live in and in the many individuals effected.

> *The NSW EPA Road Noise Policy documents in 3.3.1, that a noise abatement measure is feasible if it can be engineered and is practical to build, given project constraints such as safety and maintenance requirements.* ***Control of transport noise at the source often involves modifying existing technology and practices that result in small but cumulatively significant reductions in generated noise.*** *Examples of such modifications include the use of low noise pavement surfaces or reductions in vehicle speed. Control of noise at the source is always the preferred method as it reduces the impact on the entire surrounding area. Noise path control or mitigation at the receiver end usually requires adopting measures such as barriers or at-property treatments that block the transmission of noise. As the benefit from these measures would only apply to a limited area, they should generally only be applied after endeavouring to control noise at the source.*

The best option would be to consider all controls together or a combination. We are strongly pushing for <u>all considerations to be implemented</u> - the first and priority to be the acquisition of more homes in the current road reservation to allow expansive noise mitigation options AND if future modelling and monitoring determine that the noise options that have been implemented are inadequate to allow for additional noise abatement measures e.g. noise barriers and mounds. <u>The impact on the local community and residents should be the utmost priority to the project.</u>

However, as shown in the map below inadequate buffer zone has been left at the Brown street section. Only one property (No. 1) is being acquired on the Northern side of the street

Figure D-9 Properties impacted by the project - Map 9

it is evident from the above image that this is not consistent with the surrounding streets where a larger buffer has been considered.

<u>Concern: Noise Accumulation</u>

> *As covered in the RTA Environmental Noise Management Manual 'there is a inverse relationship between sound intensity and distance. Noise from a point source such as an*

individual vehicle will increase by 6dBa if the distance is halved. Similarly, if the distance is doubled the noise level will fall by 6dBa'.

Noise attenuation has a significant impact in the planning options available for noise mitigation - i.e. in the design phase ensure that nearest houses are at an adequate distance to achieve the noise attenuation effect and compliance with acceptability criteria.

Other options should include noise reduction road surface, barriers, mounds and as a final resort residential architectural design options.

In addition, there is a lack of detail as to ANY noise mitigation measures (the EIS stating it has limited availability of options) that will be installed in the vicinity of Brown Street. There had been mention at WestConnex face-to-face meetings of a cul-de-sac for Brown and Florence Streets with a barrier along Campbell Road. Why is this not an option? By commissioning top order noise mitigation options the impact from Campbell Road would be minimised as much as possible.

Concern: Noise Mitigation Measures at Residential Receivers

M5 EIS - Covered under 8.2 St Peters Interchange, based on the results covered in 6.1 a total of 144 residential receivers were identified as eligible for consideration of additional noise mitigation measures. In addition two buildings within St Peters Public School are likely to experience noise levels which exceed the internal noise criteria with windows open.

Due to the limited availability of noise mitigation options, 144 residential receivers would continue to have residual noise levels above the controlling criterion. These receivers would be eligible for the consideration of at-property treatments to achieve compliance with the applicable noise goals. This should be subject to confirmation during detailed design.

In regard to the above paragraph from the EIS, simply dealing with the residential receivers via architectural treatment does not alleviate the impacts on the entire community, local streets and local parks including Simpson Park on Campbell Street and Camdenville Park or our personal outdoor living space. We do not want to live in a closed box where we are unable to open the windows and doors due to the noise. Also, there is no consideration of the St Peters pre-school where young children aged 3-5 are located. Our eldest child attends this pre-school It is imperative that the entire St Peters school AND pre-school are considered also for noise mitigation measures, not just two buildings with 'windows open'.

Concern: Failure to comply with community safeguards

The M5 EIS fails to adequately consider community safeguards put in place by NSW Government State Agencies including the NSW EPA Road Noise Policy and RMS Noise Mitigation Guidelines. These guidelines have been developed to protect the community and should be adhered to at all times including state significant developments. This is a significant failing of the EIS.

Concern: Parallel Routes Assessment

The EIS has also failed to consider noise measurements outside an 'arbitrary study' area selected by the proponent. The requirements have been clearly set out by the RMS and are referred to in the EIS:

EIS - 6.1.11 Parallel routes assessment

As a result of the project it is likely that traffic would be redistributed across the local road network. This has the potential to have a road traffic noise impact on receivers located on parallel routes. These routes comprise roads which have not been considered as project roads. The Noise Criteria Guideline considers any project to be a traffic generating

development if it is predicted to increase noise levels by greater than 2.0 dB(A) on any other road. Therefore an assessment of the potential impacts is required.

EIS - 9.2.3 Parallel routes

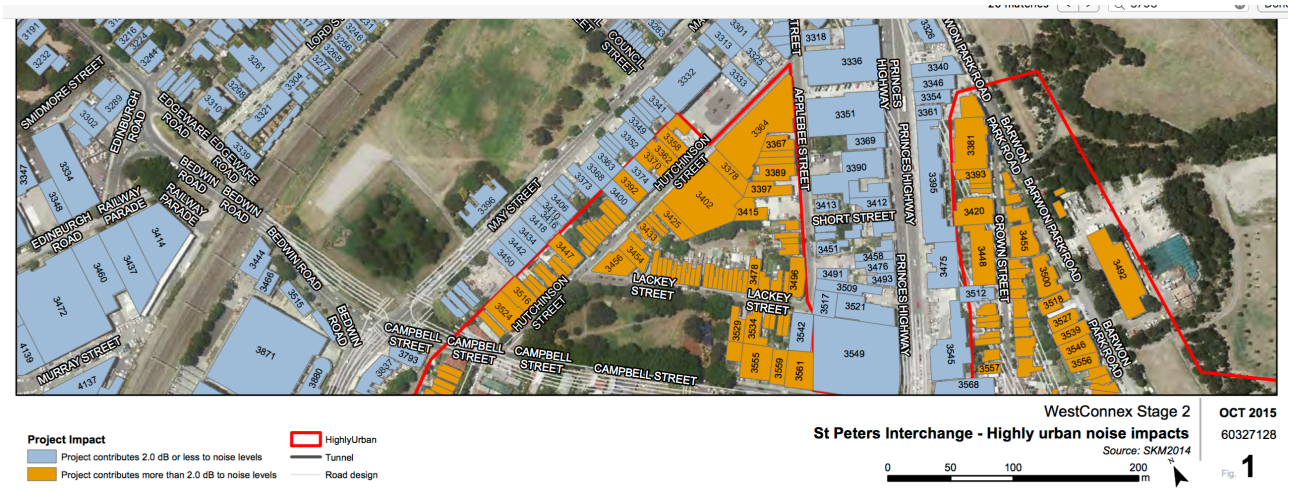
In accordance with the Roads and Maritime's Noise Criteria Guideline, to be considered a traffic generating development (which would require further consideration of mitigation measures) the road would need to increase noise levels by more than 2.0 dB(A).The impact has been considered to be minor and would not appreciably impact other routes.

This parallel route assessment has not been considered in the EIS and there is no apparent justification for this being omitted. There appears to be no further studies of the impacts on surrounding local roads past Campbell Street - this includes Edgware Road, Unwins Bridge Road, May Street and a myriad of other streets that will become 'rat runs'.

Rather the EIS states that the requirement was "considered and would not appreciably impact on other routes". The properties whereby this community safeguard applies is very straight forward and prescriptive as set out by the RMS- where the predicted increase in noise levels as a result of the project is greater than 2.0 dB. This is not a subjective guideline.

Westconnex was contacted (28/1/2016) to assist in the clarification of the noise assessment and details of roads outside of the noise assessment considerations in the EIS report. After a detailed discussion it was brought to my attention that the red line on the maps in the EIS is an arbitrary line defined by Westconnex that defines the study area and (supposed) responsibility limits.

The key to the aerial photo/map below (apparently incorrectly) states that the red line defines "Highly urban areas" . Source: EIS numerous maps (Appendix F).



There appears to be 2 significant issues with the key to this map and adherence to the policy:

Issue 1: The Area labeled "Highly Urban" is not as would be expected by definition highly built up areas. Rather, it defines the area that Westconnex (selected by person) consider the boundary of responsibility for the project (confirmed in phone conversation today) and the area of impact from Campbell Street.
The orange colour associated with an increase of 2dB is all within this defined Westconnex boundary. This is no coincidence and outside of this defined project boundary, there is obviously a

lack of data or modelling to even consider the very likely increase of whether the 2 dB that would occur as as result of this roadworks. The Westconnex 'perceived' responsibility boundary should be extended in a much greater area than what is currently displayed and reported on.

Issue 2: The Blue colour indicates that for the houses "Project does not contribute to 2.0 decibels or more". It appears that this statement /key is incorrect. Even property labeled 3364 and 3368 in the wedge at the greatest distance from the road changes are indicated to have an impact of > 2.0 dB BUT the properties much closer to the road with no detailed noise mitigation study or outside of the area of perceived responsibility are in blue - indicating no increase in noise. Once again, this is no coincidence. It appears no modelling has been done on the properties outside of the red zone to determine if there would be an increase or not.

It is difficult to see how a decision was made on where the red line ends (the study area) and responsibility ceases. Peruse over the maps detailed in section F and you will see many examples where it is hard to fathom how neighbouring houses or roads are not seen to have an increase of 2.0 dB. At a minimum the EIS should have carried out further due diligence to investigate and report on the potential and the findings. Obviously, the project roads should be expanded to include a larger number of local roads rather than the small sample that WestConnex consider are affected by the project. It would appear that the areas where a 'high level' of noise is already assumed will not be further investigated. However, the requirement from the guidelines clearly state it is the change in decibels rather than actual levels.

An easy example of where there appears to be critical errors on the numerous maps (Appendix J Sub-Appendix F) that "Project contributes 2.0 db or less" the is seen in the residences and roads adjacent to our home in Brown Street. **The predicted change in noise is 8.7 decibels at our residence** (coloured orange in the map).

The predicted noise levels set out in Appendix J of the EIS are above the RMS Noise Mitigation Guide (NMG) 'acceptable criteria'. Our home is considered in *Table 6.1.10 Noise sensitive receivers eligible for consideration of additional noise mitigation*.

ID	Address	Use/Road category	$L_{Aeq(9hour)}$ noise level dB(A)		Change in noise level dB(A)
			No Build	Build	
3829	83 Church Street St Peters	Residential New	55	62	7.4
3831	9 Brown Street St Peters	Residential New	53	62	8.7

The Town and Country Hotel is our direct rear boundary neighbours and their facade is on the corner of May and Campbell Street. They fall outside the red line and (supposedly) according to the key, do not have a predicted increase of 2.0 dB. This is well below the 8.7 dB change our residence is predicted to have. Note that there are no noise mitigation measures detailed between the two properties and and they are very closely located. In questioning this example with Westconnex staff on 28/1/2016, I was informed that they fell outside the study area red line on map above and (supposed) responsibility area.

This is one example of failure to adequately address the requirement and the same issue can be seen on a larger scale across many roads and communities within the Technical working Paper on Noise and Vibration. The implication is that there is a gross under reporting in this respect & a failure to consider the residents in the affected areas.

This should not be an arbitrary line drawn up by Westconnex whereby hands are wiped and responsibility ends. Rather the study area should be driven by safeguards such as those built into the RMS Guidelines. As a member of the wider community effected by the project I am very concerned that such safeguards could be erroded.

A broader example of concern- Edgware Road. This roads would significantly increase the application of the RMS guideline and requirement for inclusion in this report under **M5 EIS *9.2.3 Parallel routes***. I believe that it it is not unreasonable to require an investigation to run a predicted noise increase model based on the very likely increases in traffic on this road as a result of the project.

Concern: Construction noise and vibration

The project construction phase will cause an increase in noise and vibration at our residence. As the parents of two small children, the noise and vibration will have detrimental affect on our well being and quality of life. We are concerned that there are not adequate mitigation measures in place to minimise this and feel the massive works required are inappropriate for a community such as St Peters. We believe our home should have noise and vibration mitigation measures in place during construction and operation. It is simply bad practice to consider mitigation measures after the construction phase.

There is growing scientific evidence that even in the short term, high levels of noise and vibration will cause long term health impacts.

VISUAL IMPACTS AND URBAN DESIGN

Concern: Light Pollution

The building of the St Peters Interchange and upgrade to Campbell Road will result in additional signage, traffic lighting and street lighting.

The EIS does not adequately cover the consideration of increases in light pollution on our street and residence. There will be an obvious 'light glow' around the upgraded road. We currently sight our neighbours and other properties but if all the acquired properties are demolished, it will leave an obvious gap where the oncoming traffic movements will sight directly into our front of house.

Campbell Road is currently in darkness during night hours except for minimal low impact lighting. The new road will require extensive bright lights which will directly impact on our residence.

Concern: Visual Amenity

Under chapter 14.3 of the M5 EIS,

> *Road upgrades to the land surrounding the St Peters interchange include widening of Campbell Road, Campbell Street and Euston Road, as well as new bridges spanning the Alexandra Canal and adjoining Campbell Road and Gardeners Road. The widening of Campbell Road and Campbell Street would contribute to visually significant character changes within these road corridors. Where the widened road passes through land zoned SP2 Infrastructure, B4 Mixed Use and IN2 Light industrial, the change in character would be in keeping with the desire to 'maintain access and connectivity between local centres of employment and economic activity'. Where the road widening passes through land zoned RE2 Low Density Residential and adjacent to RE1 Public Recreation (ie Campbell Street), the character of the new road is consistent with the nature of this area as a road reserve in a residential area.*

This is completely unacceptable to state that the because we currently live in a road reserve that the new Campbell Road widening will be consistent with the current situation. Campbell Road is currently two lanes and has peak periods AM and PM but the remainder of the time is a relatively quiet street. The changes to Campbell Road will increase traffic movements at all times of the day and night and change the local street feel that Campbell Road currently has. The removal of the buffering homes in the street effectively reduces the road reserve and we become the new closest edge of the reserve rather than part of an entire road reserve system. Again, we request the opportunity for WestConnex to acquire a greater number of homes in the road reserve that has currently been acquired.

Table 14.15 of the EIS demonstrates the the Campbell Road upgrade between Unwins Bridge Road and Princes Highway have a nigh sensitivity of receivers and the magnitude of change will be moderate. We disagree that the change will be moderate. Upgrade from a two lane road with peak periods, slow speeds and overnight truck restrictions to a six lane road is not moderate. Nor does it factor in the removal the buffer homes that we currently enjoy. The project will require the demolition of up to 4 homes on the southern side of Brown Street - increasing our sensitivity from your estimation of 'moderate' to high impact. In addition our access to Simpson Park will be untenable with prams and bikes.

Concern: Destruction of Greenspace

The St Peters Interchange and Campbell Road widening will destroy existing greenspace in Sydney Park, existing street trees and the beautiful old Banksia trees in the reserve on the corner of May and Campbell Roads. This will remove areas for residents and communities to utilise. The recent stormwater infrastructure project in Sydney Park has created an amazing open space parkland and it seems incredulous that in 2016, the NSW Government to be removing hard won greenspace. Greenspace is vital for all cities and for Sydney to remain a healthy vital city outdoor areas must be made available to its residents.

The destruction of large parts of Camdenville Park for construction zones will render Marrickville Councils plans for a children's bike track and play area null and void. This is a much needed addition to the inner west and replacing this with parking areas and construction zones is unacceptable. The park is a well utilised green space within this part of St Peters - both recreational and for sporting events.

Concern: Loss of Public Amenity in St Peters

The St Peters Interchange and Campbell Road widening will change the entire look and community feel of St Peters at a time when St Petes is undergoing massive positive gentrification. The improvements and property boom of a suburb so close to the city and walking distance of the vibrant suburb of Newtown should not be ignored. It has a reliable and extensive public transport system and a huge tollways splitting the suburb in two will not help in the ongoing improvement of the suburb.

SOCIAL AND ECONOMIC

Concern: The Social Impacts of a large scale project.

The St Peters Interchange and more directly the Campbell Road widening will have a huge, unknown toll on our family and neighbours. The EIS is inadequate in its considering of the social impacts of the project and we certainly have not been contacted for a formal survey as part of the economic and social component of the EIS. We assume it is another generic document that is created using WestConnex assumptions and other road projects.

There will be significant stress and psychological impact on ourselves and residents due to a loss of community, homes, amenity and most importantly the impact of living with years of demolition,

construction and commission works. There will also be a cumulative effect of all the changes on ourselves and children with minimal means of mitigation for these cumulative social impacts.

Concern: Devaluation of Property

Despite property values being branded a 'temporary nature' in AECOMS Social and Economic Impact Study, we have grave concerns for the devaluing of our property as a result of the Campbell Road widening. The proximity to a large road will have negative impacts on our home and its value. IN addition, we must also put any improvements, renovations or selling that we had considered on hold until after the project has opened. This is a incredible amount of time for us to see what the future of this project looks like.

AIR QUALITY

Concern: Air Pollution

We are concerned that the Campbell Road widening will be a significant contributor to overall pollution levels in St Peters and in particularly around our home. Living close to busy roads is a health risk and the increases in car numbers in this area will cause an increase in air and dust pollution. There is strong scientific evidence that air pollution, especially PM 2.5 and PM 10 are linked to increased risks lung disease, impaired lung development, strokes, cancer and other forms of respiratory illness.The EIS acknowledges that Campbell Road, St Peters Interchange and other local roads will become more utilised and therefore by default more polluted. In some cases, air pollution is already at unhealthy level. The acquisition of properties in St Peters has reduced the impact boundaries and we are considered an the edge of the project works. It would be advisable to acquire additional properties and put in mitigation measures including green spaces to reduce the impacts of air pollution on local residences.

We have grave concerns that Leightons/CIMIC, who have been awarded the contract before approval, decided that ventilation stacks should not be filtered although tollway projects in other countries have ventilation stacks which filter emissions. The EIS asserts that there will be very low ' negligible' emissions in local areas from the stacks'. One reason engineers give for filtering tunnels is to protect residents in high buildings or land. In this project, some residents live on hills and others (e.g. in Arncliffe) live in high buildings. There are experts who say that stack emissions are not safe and should be filtered. We are well within the drop zone for these unfiltered tunnels and are concerned about the increases in air pollution on our place of residence and local schools and parks.

The increases in traffic will spill over into other roads and streets but because the traffic modelling only extends to two intersections past the boundaries of the Westconnex project, these increased air pollution levels have not been modelled or presented in the EIS. This was also a factor discussed in the noise modelling part of the EIS.

As well, the assessment of air quality and noise impacts are completely dependent on the traffic modelling. We have already seen that the traffic impacts of the New M5 are extremely uncertain. For this reason, the air, noise, social impacts and health risk assessments cannot be regarded as reliable.

WESTCONNEX PROJECT

We object to the entire WestConnex Project for a number of important reasons:

- The WestConnex Project and Sydney Motorway Corporation lacks transparency and is not accountable to the NSW taxpayers. There has been no thorough business case released to the

public. There have been minimal studies of alternatives including a public transport system or freight by rail. Alternatives would be a better investment of $16.8Billion.

- The EIS fails to nominate who is independently reviewing the project in all aspects.
- Impacts on local traffic surrounding the St Peters Interchange. Traffic in St Peters, Enmore, Tempe, Sydenham and Newtown will increase as a result of the project with more cars spilling on to local residential roads.
- Evidence has shown the building bigger and more roads does not alleviate traffic congestion but causes additional movements leading to further connection 'cars hold up traffic'.
- The M4/M5 Projects will require hefty toll increases to fund the project. Not only will this put pressure on local tax payers but also create rat runs through local streets to avoid tolls.
- The St Peters Interchange will cause a large increase in particulate pollution and risk to human health but increase in traffic movements and increases on local residential roads. This is unacceptable to place the residents of St Peters at high risk. Local schools and child care centres will also be impacted by increases in traffic movements. It is imperative that alternative solutions are considered including a mass transit system.
- The incredible expense and waste of tax payers money in not only acquiring Alexandria Landfill from Dial-a-Dump but compensating Mr Malouf for the privilege. Regardless of the contamination of the site the cost of remediation is simply a drain of the tax payers of NSW.
- There must be a NSW Upper House Inquiry and Auditor Generals review of the EIS process.

As a local resident, rate payer and tax payer I ask that my objection to the M5 extension and St Peters Interchange be recorded. I ask that our objections are properly considered and understand that the Department of Planning will publish our name and submission on the website. Please reply directly to my submission and not send us a generic response. This will not be accepted. I have not given more than $1000 to any political party.

Elissa Bishop and Samuel Prisk
[redacted]
St Peters
NSW 2044

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: Linda Scott
Organisation: City of Sydney Council (Councillor)
[redacted]

Address:
[redacted]

Sydney, NSW
2000

Content:
Refer to attachment.

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Councillor Linda Scott

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Sydney NSW 2001 Australia

Telephone +61 2 9288 5917
Fax +61 2 9265 9204
[redacted]
cityofsydney.nsw.gov.au

The Hon. Rob Stokes MP
Minister for Planning
GPO Box 5341
Sydney NSW 2001

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

Thank you for the opportunity to provide the following submission regarding the WestConnex New M5 Environmental Impact Statement (EIS).

I write as a Councillor on the City of Sydney Council to make the following comments on the EIS for the WestConnex New M5 project.

Please note that I oppose the WestConnex project as conceived in the EIS for the reasons detailed below. It is my strong belief that the inadequacy of the New M5 EIS is so profound that I do not believe it can be used as the basis for a Ministerial determination to approve the project.

The strategic justification for the New M5 is weak and inconsistent with the NSW Government's strategic planning and policy framework. The project as proposed in this EIS does not deliver the broader objectives of WestConnex as stated in the *Updated Strategic Business Case* (November 2015).

Specifically, I write with a number of concerns regarding the project and to express my strong opposition to the WestConnex project as a whole conceived in the EIS, noting that the information contained within the EIS for the New M5 means that it:

- Does not resolve the key need to deliver freight links to Kingsford Smith Airport and Port Botany, reduce congestion, and deliver sustainable urban development objectives;
- Will reduce green space available in Sydney Park;
- Does not contain traffic modelling outside the immediate impact area and contains doubtful assumptions in the traffic modelling provided inside the immediate impact area;
- Will likely cause significant traffic congestion and impacts upon public health in the immediate impact area; and
- Sets out future clearways and road widenings that were not initially intended as part of the project.

Sydney2030/Green/Global/Connected

Further, I write with a number of concerns regarding the project, noting that:

- As a result of the WestConnex New M5 project, the volume of traffic flowing into the City of Sydney LGA via the St Peters Interchange and the upgrades of Campbell Street and Euston Road will increase, with no increased investment on alternative public transport pathways;
- The New M5 and St Peters Interchange will impact upon the public amenity of Sydney Park by removing sections of green space caused by road widenings along Campbell Street and Euston Road;
- The project will lead to greater levels of traffic in the inner-city by creating an induced demand for private motor vehicle transportation, leading to traffic congestion in inner-city streets and failing to adequately respond to the challenges of transport in Sydney;
- The project, by inducing greater levels of private motor vehicle traffic to use roads, will have negative health consequences on local communities by increasing the level of pollutants emitted by motor vehicle traffic in the area, as well as localised negative impacts caused by ventilation stacks along the route of the project;
- By inducing greater levels of private motor vehicle use, the project will likely cause the need for clearways on King Street, Newtown – and turn this thriving cultural high-street into another version of Parramatta Road. Clearways will likely destroy local businesses, cost local jobs, and reduce public amenity on this culturally significant high street; and
- By encouraging private motor vehicle transport and adding to traffic congestion, the project will increase greenhouse gas emissions when compared to other modes of public transport which are less-intensive greenhouse gas emitters.

Failure to Achieve the Aims of the WestConnex Project

The WestConnex project has been described as a road access project linking Kingsford Smith Airport and Port Botany to the wider road network.

In its current form the WestConnex project will not deliver upon its promise to provide links for freight vehicles and passenger vehicles to the airport and port facilities via the proposed Sydney Gateway. The proposed road connection to the airport and port facilities is currently not designed and remains unfunded. Further, the Sydney Gateway does not currently form part of the WestConnex New M5 plans, raising questions about the ability for WestConnex to deliver upon its stated aims.

The proposed alignment of the New M5 does not deliver on the fastest and most direct path to Kingsford Smith Airport and Port Botany. The proposed route veers away from the airport and port facility to terminate at the St Peters Interchange, and the future route of the connection to these two facilities will require vehicle movements to flow in the opposite direction to their destinations all the while immediately depositing thousands of vehicles into the suburbs of Newtown, Alexandria, Green Square, and Erskineville.

CITY OF SYDNEY 2030
Sydney2030/Green/Global/Connected

Impacts upon Local Traffic

The WestConnex New M5 project will have the immediate impact of depositing extra vehicle movements into communities within the City of Sydney. According to traffic modelling conducted for the WestConnex New M5 portion of the project only and which has been provided to the City of Sydney, the total effect will see an increase of 12% to traffic movements across local roads in the suburbs north of the St Peters Interchange. Euston Road will experience an increase of 69% to traffic movements along that road, which borders Sydney Park due to the WestConnex New M5 project. This significant increase to traffic movements also presents safety risks for pedestrians accessing and enjoying the amenity of the park.

Should the project proceed and traffic estimates be shown to be incorrect, I request that conditions be inserted to prevent any further road widening due to increases in traffic. Traffic modelling provided to the City of Sydney shows that increases to traffic on local roads increases further when the WestConnex project as a whole is considered. These traffic movements are expected to increase by 16% in the suburbs and roads north of the St Peters Interchange due to the WestConnex project. When considering the impact of the WestConnex project as a whole, Euston Road will experience an increase of 80% to traffic movements.

These impacts will present direct negative consequences to current and future residents of suburbs in Alexandria, Green Square, and Erskineville, to name a few suburbs which currently face congestion problems.

Impacts upon Sydney Park

Sydney Park is an open green space in the City of Sydney LGA that occupies 40 hectares of land in St Peters. The park is home to an area of wetlands, home to native flora and fauna, and has recently had a stormwater harvesting system installed which is designed to absorb nutrients and improve the habitat for a range of species. This open green space and wetlands area, as well as the urban ecology of the area, will likely be negatively impacted by the increase in air-pollution as a result of the St Peters Interchange, as well as reducing the public amenity of the park by situating a major new motorway adjacent to this highly patronised public space.

Sydney Park is situated adjacent to the Sydney Park Village, a mixed development of 17 buildings including 810 apartments. Further to the north of Sydney Park is the Ashmore Precinct which is expected to house over 6,000 new residents whilst to the north-east the Green Square urban renewal project is located, which is expected to house over 61,000 residents by 2030. The removal of sections of Sydney Park caused by the widening of Campbell Street and Euston Road will reduce this precious green space resulting in a loss of access to an important community commons at the same time as thousands of new residents will be moving into nearby areas that will patronise the park. Green space is already a scarce communal resource in the inner-city and any plans to reduce the size of Sydney Park will have detrimental effects on the liveability of suburbs nearby to Sydney Park.

CITY OF SYDNEY 2030
Sydney2030/Green/Global/Connected

Summary

In summary, WestConnex as whole and the WestConnex New M5 project specifically will have an enormous negative impact on the communities affected by the route with no clear evidence showing that the project will deliver upon its stated aims.

National and international evidence has shown that investment in new roads at the expense of new investment in public transport infrastructure has negative social, economic, and environmental impacts on communities and cities.

Sydney is in dire need of greater investment in public transport infrastructure, not new motorways.

Once again, I thank you for the opportunity to comment on the WestConnex New M5 EIS and reiterate my view that the New M5 project should not be approved.

Yours Sincerely,

Councillor Linda Scott
Labor Councillor, City of Sydney Council

CITY OF SYDNEY
Sydney2030/Green/Global/Connected
city of villages

Political donations disclosure statement

NSW GOVERNMENT
Department of Planning

Office use only:

Date received: ____/____/____ Planning application no. _____

This form may be used to make a political donations disclosure under section 147(3) of the *Environmental Planning Assessment Act 1979* for applications or public submissions to the Minister or the Director-General.

Please read the following information before filling out the Disclosure Statement on pages 3 and 4 of this form. Also refer to the 'Glossary of terms' provided overleaf (for definitions of terms in *italics* below). Once completed, please attach the completed declaration to your planning application or submission.

Explanatory information

Making a planning application or a public submission to the Minister or the Director-General
Under section 147(3) of the Environmental Planning and Assessment Act 1979 ('the Act') a person:

(a) who makes a *relevant planning application* to the Minister or the Director-General is required to disclose all *reportable political donations* (if any) made within the *relevant period* to anyone by any *person with a financial interest* in the application, or
(b) who makes a *relevant public submission* to the Minister or the Director-General in relation to the application is required to disclose all *reportable political donations* (if any) made within the *relevant period* to anyone by the person making the submission or any *associate of that person*.

How and when do you make a disclosure?
The disclosure to the Minister or the Director-General of a *reportable political donation* under section 147 of the Act is to be made:

(a) in, or in a statement accompanying, the relevant planning application or submission if the donation is made before the application or submission is made, or
(b) if the donation is made afterwards, in a statement of the person to whom the relevant planning application or submission was made within 7 days after the donation is made.

What information needs to be included in a disclosure?
The information requirements of a disclosure of reportable political donations are outlined in section 147(9) of the Act.

Pages 3 and 4 of this document include a Disclosure Statement Template which outlines the information requirements for disclosures to the Minister or to the Director-General of the Department of Planning.

Note: A separate Disclosure Statement Template is available for disclosures to councils.

Warning: A person is guilty of an offence under section 125 of the *Environmental Planning and Assessment Act 1979* in connection with the obligations under section 147 only if the person fails to make a disclosure of a political donation or gift in accordance with section 147 that the person knows, or ought reasonably to know, was made and is required to be disclosed under section 147.

The maximum penalty for any such offence is the maximum penalty under Part 6 of the *Election Funding and Disclosures Act 1981* for making a false statement in a declaration of disclosures lodged under that Part.

Note: The maximum penalty is currently 200 penalty units (currently $22,000) or imprisonment for 12 months, or both.

Glossary of terms (under section 147 of the *Environmental Planning and Assessment Act 1979*)

gift means a gift within the meaning of Part 6 of the *Election Funding and Disclosures Act 1981*. Note. A gift includes a gift of money or the provision of any other valuable thing or service for no consideration or inadequate consideration.

Note: Under section 84(1) of *the Election Funding and Disclosures Act 1981* gift is defined as follows:

gift means any disposition of property made by a person to another person, otherwise than by will, being a disposition made without consideration in money or money's worth or with inadequate consideration, and includes the provision of a service (other than volunteer labour) for no consideration or for inadequate consideration.

local councillor means a councillor (including the mayor) of the council of a local government area.

relevant planning application means:

a) a formal request to the Minister, a council or the Director-General to initiate the making of an environmental planning instrument or development control plan in relation to development on a particular site, or
b) a formal request to the Minister or the Director-General for development on a particular site to be made State significant development or declared a project to which Part 3A applies, or
c) an application for approval of a concept plan or project under Part 3A (or for the modification of a concept plan or of the approval for a project), or
d) an application for development consent under Part 4 (or for the modification of a development consent), or
e) any other application or request under or for the purposes of this Act that is prescribed by the regulations as a relevant planning application,

but does not include:

f) an application for (or for the modification of) a complying development certificate, or
g) an application or request made by a public authority on its own behalf or made on behalf of a public authority, or
h) any other application or request that is excluded from this definition by the regulations.

relevant period is the period commencing 2 years before the application or submission is made and ending when the application is determined.

relevant public submission means a written submission made by a person objecting to or supporting a relevant planning application or any development that would be authorised by the granting of the application.

reportable political donation means a reportable political donation within the meaning of Part 6 of the *Election Funding and Disclosures Act 1981* that is required to be disclosed under that Part. Note. Reportable political donations include those of or above $1,000.

Note: Under section 86 of *the Election Funding and Disclosures Act 1981* reportable political donation is defined as follows:

86 Meaning of "reportable political donation"

(1) For the purposes of this Act, a reportable political donation is:
  (a) in the case of disclosures under this Part by a party, elected member, group or candidate—a political donation of or exceeding $1,000 made to or for the benefit of the party, elected member, group or candidate, or
  (b) in the case of disclosures under this Part by a major political donor—a political donation of or exceeding $1,000:
    (i) made by the major political donor to or for the benefit of a party, elected member, group or candidate, or
    (ii) made to the major political donor.

(2) A political donation of less than an amount specified in subsection (1) made by an entity or other person is to be treated as a reportable political donation if that and other separate political donations made by that entity or other person to the same party, elected member, group, candidate or person within the same financial year (ending 30 June) would, if aggregated, constitute a reportable political donation under subsection (1).

(3) A political donation of less than an amount specified in subsection (1) made by an entity or other person to a party is to be treated as a reportable political donation if that and other separate political donations made by that entity or person to an associated party within the same financial year (ending 30 June) would, if aggregated, constitute a reportable political donation under subsection (1). This subsection does not apply in connection with disclosures of political donations by parties.

(4) For the purposes of subsection (3), parties are associated parties if endorsed candidates of both parties were included in the same group in the last periodic Council election or are to be included in the same group in the next periodic Council election.

a person has a financial interest in a relevant planning application if:

a) the person is the applicant or the person on whose behalf the application is made, or
b) the person is an owner of the site to which the application relates or has entered into an agreement to acquire the site or any part of it, or
c) the person is associated with a person referred to in paragraph (a) or (b) and is likely to obtain a financial gain if development that would be authorised by the application is authorised or carried out (other than a gain merely as a shareholder in a company listed on a stock exchange), or
d) the person has any other interest relating to the application, the site or the owner of the site that is prescribed by the regulations.

persons are associated with each other if:

a) they carry on a business together in connection with the relevant planning application (in the case of the making of any such application) or they carry on a business together that may be affected by the granting of the application (in the case of a relevant planning submission), or
b) they are related bodies corporate under the *Corporations Act 2001* of the Commonwealth, or
c) one is a director of a corporation and the other is any such related corporation or a director of any such related corporation, or
d) they have any other relationship prescribed by the regulations.

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)
LINDA SCOTT	SSI 14_6788

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
REFER TO SPREAD SHEET.				

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: 29/1/2016

Name(s): Linda Scott.

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

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Content:
I fully oppose the plans for the West Connex development at St Peters because it would destroy the environment and the quality of life of local residents in a high density area. local residents would be forced to endure more noise (in addition to aircraft noise), toxic air pollution, traffic.

In addition to this it destroys the ambience of a much loved Sydney heritage area. Sydney residents are proud and fond of their heritage areas such as Newtown, and people visit the area from all over Sydney. A big road development like West Connex would dwarf the surrounding buildings, makeSydney park undesirable and turn what is a nice area into a car park. Sydney should be nurturing more areas to have a village atmosphere like the inner west as it is better for the environment and culture. No one wants Sydney to become a city of highways and grossly oversized shopping centres that alienate footpath pedestrians....like Ls Angeles!

The government needs to upgrade the Princess Highway but not at this scale. the exit should be in the industrial zones near the airport not next to residential areas.

The government needs to improve public transport so there is less pressure on roads. Light rail, trains and more regular buses are desperately needed.

Finally, the residents of inner western suburbs where their use of cars in minimal should not be punished with more traffic, noise and pollution. Public transport is the answer not highways.

Kind Regards

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: Jackie Davis
[redacted]

Address:
[redacted]

Newtown, NSW
2042

Content:
I am a long-term homeowner at the south end of Newtown, and I strongly object to West Connex New M5 for a number of reasons.

1) The secrecy with which the government and private industry are colluding on the project

2) The fact that this road will not solve the challenges to transporting freight to the airport and ports

3) The facilitation of more vehicle traffic rather than less in Sydney

4) The deceit regarding costs for this project.

5) The increased pollution

6) The damage to Sydney Park

7) The devastating impact this will have on Newtown

There is more, but I will stick with these issues, commenting briefly on each below.

1) The secrecy with which this project is progressing is frightening and undemocratic. It smacks of corruption, and therefore the Federal Auditor General must review the process thoroughly and ensure that issues impacting on public health, the environment, proper budget projections, and consideration of upgraded public transport instead of vehicle traffic are assessed.

I can see no possible reason for this secrecy other than business and politicians being so determined for the project to go ahead that they have to prevent revelations of information that could get in the way of the project's progress.

2) I understand the project is aimed at resolving the problem of freight access to Sydney Airport and to ports.

I also understand that West Connex does not lead to either the airport or the ports, and that the road that would link West Connex to these locations is not yet funded. No doubt, government will force that through after West Connex is built. However, the point is that West Connex is not resolving the freight issue.

3) The freight issue would likely be addressed if the NSW and Federal Governments took the wise and brave stance of improving public transport between outlying areas, and from outlying areas to the city.

This would of course require similar losses and inconveniences and grief for many due to construction requiring loss of existing homes and lands. But it would lift Sydney into it's deserved place among other brilliant cities with excellent public transport systems that are recognised worldwide for their efficient transport systems which decrease pollution.

With far less need for cars on the roads due to a much improved public transport system, trucks would be able to travel much more safely and efficiently to Sydney airport and to ports.

4) The budget for this road has already blown out significantly, and this is before so much of it has even begun. This budget blow out will no doubt continue to escalate further, as new challenges are faced.

This will require similar forcing through of new or wider roads, with the argument being that there is now no alternative.

This again is undemocratic and deceitful.

5) Importantly, budget forecasts do not take into account the huge increase in air particulates and other air pollutants that will impact on public health. Southwest and Western Sydney already have visible smog overhead, and now the NSW and Australian government are putting West Connex in place which will only increase air pollution.

With all we know about the direct impacts on both public health and global warming, how can the government possibly be considering adding to this problem, instead of making the brave and budget conscious decision to decrease the problem by investing in public transport, not more roads???

6) Similar to budget forecast blow-outs, the revised plan is now going to take even more land off of the amazingly successful and beloved Sydney Park.

The renovation of this park from a tip to a beautiful open space, thriving with families, children, dogs, performers, wetlands, cricket oval, water recycling is an absolute joy.

Sydney, NSW and Australia deserve to be SO proud of this accomplishment, and now not only is significant amount of land going to be taken from it, but the roads surrounding this park will disperse high levels of air pollution into these beautiful green spaces, and further off into southwest and western Sydney.

The NSW and Federal governments surely cannot argue positively for such a short-sighted road insfrastructure!!!

7) The huge interchange planned for the St. Peter's is going to impact in a massively negative way on traffic here in Sydney's inner west.

While some of these roads are not overly trafficked now, this is already changing due to the massive increase in apartment blocks already complete or near completion throughout the inner west area.

Accurate traffic projections, taking into consideration both the huge population growth here, as well as this huge interchange, have not been undertaken.

The almost unimaginable damage that this interchange will result in for Newtown is inexcusable.

Newtown is a treasure in NSW, known for it's diversity, pedestrian friendly atmosphere, community connections, huge range of shops, cafes and restaurants.

The interchange will force King Street becomes a clearway, then shops will not be able to last, and this thriving precinct will become boarded up buildings.

Again, I call on the Federal Auditor General to review all aspects of this project thoroughly and objectively. This would need to include an honest environmental impact assessment, consideration of the impacts of greater pollution, an assessment of improved public transport options, budget considerations, and the opportunity for NSW to once again model to the world a proactive approach to facilitating strong communities and a proactive approach to reducing global warming.

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: Paul Waddington
[redacted]

Address:
[redacted]

Alexandria, NSW
2015

Content:
SUBMISSION TO M5 EIS

[redacted]

I am writing to confirm my strong objection to the proposed New M5 as a longstanding resident on Alexandria some 20 years who also works locally and rides to work along the roads to be impacted by WestConnex.

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.

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 which as a cyclist gives me considerable cause for concern. 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.

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).

Yours faithfully

Paul Waddington

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

SUBMISSION TO M5 EIS

Paul Waddington
[redacted] **Alexandria**

I am writing to confirm my strong objection to the proposed New M5 as a longstanding resident on Alexandria some 20 years who also works locally and rides to work along the roads to be impacted by WestConnex.

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.

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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.

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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.

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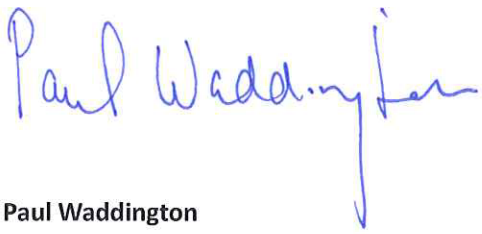
I call for the M5 EIS not to proceed. As a NSW taxpayer, I want better value for money.

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).

Yours faithfully



Paul Waddington

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Content:
I object to WestConnex taking large sections of Sydney Park and using it for a polluting toll road.
I object strongly to the loss of my public green space and the loss of trees.
Our public parks need to be protected. It is ours... not the governments to destroy.

[redacted]

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[redacted]

Name: Gary Fry
[redacted]

Address:
[redacted]

Newtown, NSW
2042

Content:
There has been a lot of information within media, old and new, concerning the business case of the WestConnex road system. Stories abound about whether the largest infrastructure project in Australia's history is a good spend, or not. What is difficult for me to understand is how a project of this cost is designed entirely around last century's technology. Such a large-scale project must look beyond the immediate business and social needs, and consider those of many decades hence. A project around the car does not. This is old technology. This is not a government leading by example. However, a project around the expansion and then intensive use of public transport could be a shining example to many.
Australian governments are finally putting policies in place around managing impacts of climate change. Unfortunately, there is still too little leadership from any government leading to the sorts of changes we need to take and make to offset this greatest catastrophe heading our way. The construction of the WestConnex project simply confirms to the people of Sydney that their on-going need to have a private car is valid.
The issue I have with WestConnex is not about whether we should have tunnels, or not. It is about the short sighted planning that has resulted in a transport solution that belongs in the last century. This is a project which will hasten us towards the impacts climate change will have, rather than move us towards a solution.
I urge you to show some real leadership, halt construction of WestConnex and re-imagine what transport could look like in one of the great cities of the world.
Sincerely

Gary Fry

[redacted]

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[redacted]

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

To the Director, Major Planning Assessments, Department of Planning

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

I strongly object to this project and the entire WestConnex of which this is part.

I ask that you reject this proposal on the basis of the flawed environmental impact statement (EIS) resulting in incorrect and/or inadequate data provided to the Public for consideration and to be used as the basis of their submissions in response to the EIS.

I request written receipt from you of this submission and request my submission be published.

Failure of EIS to comply with Requirements.

The EIS does not comply with the Secretary Environmental Assessment Requirements (SEARS). Therefore the EIS should be invalid. The SEARS provide an analysis of feasible alternatives to the carrying out of the proposal and proposal justification and therefore failure

EIS fails to meet its Stated Objectives

The EIS fails to meet its stated objectives and to address Public interest significant matters.

The stated objectives for WestConnex, including the New M5, were contrived to fit the project after it had already been announced, therefore I believe there was a lack of transparency to the public.

WestConnex and the New M5 fails to meet the stated objectives, including but not limited to;

- WestConnex and the New M5 will cause irreversible biodiversity loss, rather than minimising impacts to biodiversity.
- WestConnex and the New M5 will reduce social and visual amenity across the route.
- WestConnex and the New M5 will worsen regional air quality.
- WestConnex and the New M5 will significantly add to noise pollution.
- WestConnex and the New M5 will actively worsen congestion in many parts of Sydney, and make little impact on congestion across the rest of the city.
- WestConnex and the New M5 will have devastating impacts on local communities and local amenities.

- WestConnex and the New M5 will be a massive contributor to greenhouse gas emissions, while destroying important habitat and greenspace.
- WestConnex and the New M5 is a financial black hole that won't solve Sydney's traffic congestion.
- The WestConnex project including the New M5 lacks transparency and accountability.
- The WestConnex project comes with no real evaluation of alternative options such as world class public transport.
- The WestConnex EIS fails to consider and publicly declare the cumulative impacts of the project. The Public are only being told 'part of the story'.
- This EIS considers benefits for all stages of the project but doesn't address the negative impacts along the whole route.

AECOM and questionable standard of the EIS

I strongly object to the fact that AECOM, who it appears has a record of failed traffic modelling, and I note the modelling in this project appears to rely on other WestConnex contracts going ahead. It appears AECOM have been paid $13 million of taxpayer money to complete this EIS. The EIS is of poor quality, filled with errors, basic omissions, superficial analyses, and opaque modelling.

AECOM has a history of providing over-optimistic traffic forecasts for toll roads, resulting in previous financial failures (e.g. Clem7 in Brisbane). The flaws and optimistic assumptions in the traffic modelling in the EIS mean that toll revenue is likely to be significantly lower than forecast.

TRAFFIC MODELLING

I am aware that independent traffic experts have not access to full information about the assumptions on which traffic modelling. The proponents must be instructed to fully respond to independent experts who have been commissioned by Councils or are academic researchers and to make their models available. AECOM and RMS openly admit that they have collaborated on the modelling. Their claims must be fully and independently scrutinised. When the living conditions of thousands of residents and billions of dollars of public money are at stake, it is not acceptable for a government department or private company to keep such a model secret.

Independent transport modelling experts have found scores of problems with the application of the WestConnex Road and Traffic Model, which has not been released for scrutiny. It would be negligent for any government to go ahead with a project based on uncertain predictions. What is even more worrying is that the proponent now concedes that it cannot make this model work without other, unfunded toll road projects. What happens if or when these projects do not proceed? This EIS fails to assess this.

The assessment of air quality and noise impacts in this EIS are completely dependent on the traffic modelling, which appears to be based on flawed modelling, therefore providing overly optimistic usage predictions.

The traffic modelling used in this study:

- cannot be independently verified,
- is extremely limited in scope,
- is dependent on other unfunded and unplanned toll road projects going ahead (e.g. Sydney Gateway and southern extension).
- Does not adequately take in to account that as a toll road the public will be reluctant to use it.

As the traffic modelling is flawed, the air, noise, social impacts and health risk assessments in this EIS cannot be regarded as reliable.

AIR QUALITY

It is well recognised that in major cities across the world traffic-based air pollution is a major contributor to total air pollution. Major road projects encourage more traffic, while the possibility of considering other modes of transport which will alleviate or lessen air pollution impacts are overlooked or ignored.

The EIS predicts a large forecasted increase in vehicle kilometres travelled (VKT). Clearly this will result in poorer air quality, not only for the immediate areas surrounding the project but for large populations across the Sydney Basin.

The World Health Organisation (WHO) and other well respected organisations produce overwhelming international evidence that traffic-based air pollution including but not limited to:

- Increase in the number of heart attacks,
- Increase in the number strokes,
- Increased number of deaths from heart disease,
- Increase number of deaths from respiratory disease.
- Impaired lung growth in children. Recent research conducted by WHO links air pollution to impaired lung growth and increase in diabetes. These health effects occur both with long-term exposure and repeated short-term exposure, and there is no safe level of exposure to this pollution.

The air quality study in this EIS shows that some communities will be exposed to increased doses of dangerous pollution, especially those living close to the project's surface roads and unfiltered stacks.

Motorists, in particular regular users, will be further at risk when driving in the long tunnels are likely to experience high levels of exposure to air pollution. Motorbike riders will suffer even greater exposure. It is unacceptable for the NSW Government to deliberately place the health of citizens at risk in this way.

ENVIRONMENTAL IMPACTS ON CRITICALLY ENDANGERED BIODIVERSITY.

Community parks, and endangered Green and Golden Bell Frog colony, critically endangered Cooks River Castlereagh Ironbark Forest and trees along the project route would be destroyed for these projects. Some of these, such as the endangered flora and fauna, were species that the RMS was legally obliged to maintain and protect as part of construction for the M5 East. ***How could this project be called 'sustainable development'? Intergenerational equity is being denied by this project.***

SOCIAL IMPACTS ON AFFECTED RESIDENTS

The EIS Social Impact Study dismisses the impact of forcing hundreds of people from their homes and businesses on communities in a few lines. Residents are being offered below-market prices for their homes and businesses, and suffering high levels of distress and trauma as a result of this proposed project. It is also unacceptable that these acquisitions have been forced through before any planning approvals were granted. ***This action by the Governmentt also appears to indicate to the Public that a decision has already been reached, BEFORE community feedback from submissions.***

The social impact study also fails to assess the impact of this project on other communities that will be deeply affected. For example, the proponents and AECOM have not consulted properly with the community on and around Stoney Creek Road, nor informed residents that WestConnex has a plan that will make congestion and air quality worse in their neighbourhood.

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 $16.8 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.

SYDNEY PARK (A PUBLIC RECREATION AREA) SUBSTANTIAL REDUCTIO IN SIZE AND AMENITY DESTROYED

The project's proponents have misled the public about its plan to take 14,000 square metres of Sydney Park. For months it said it would only take 8,000 square metres, leaving it until the EIS was lodged to inform the local council that it planned to forcibly acquire the extra 6,000 square metres. ***Clearly the proponent would have had prior knowledge of the requirement of a further 6,000 square metres, yet this information was denied to the public. This action represents a breach of transparency by the proponent.***

Sydney Park's amenity will be diminished, as will the Public's enjoyment of the park. Peaceful paths, exercise equipment, children's play areas and sporting grounds, and more will all be adjacent to a major highway. ***Park visitors, in particular children, will be exposed to dangerous air pollution. They will also be exposed to high noise levels from the nearby traffic.*** This is completely unacceptable, as is the destruction of other vital community parks along the route.

Amenity, such as the M5 Linear Park and trees lining the noise walls, are spaces the local community has built up over many years after their community was carved up the M5 East. For all of this to be swept aside for this toll road is not only unacceptable – it is undemocratic and a grave violation of the government's environmental and legal responsibilities and their accountability to the Public.

WILL MOTORISTS BENEFIT?

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. Why would this project be the exception to this norm?

The New M5 would cause costly traffic chaos throughout the inner west and south-west Sydney. It is unacceptable that traffic modelling only took into account two intersections past the final section of proposed project. Even so, this EIS still makes it clear that this project will provide no solution to traffic congestion, as it shows several intersections across the project route will remain at Level of Service F (i.e. the worst possible level, and the one that is indicative of system failure) after the project. It also shows that many already congested roads along the route will get worse, including those around the St Peters Interchange, Bexley, Rockdale, Kingsgrove and Brighton-Le-Sands.

CONSTRUCTION IMPACTS – HEALTH AND SAFETY ISSUES

Thousands of residents and workers will be exposed to negative health impacts in all areas where demolition, earthworks, construction and removal activities will take place for up to 24 hours per day, seven days a week. This includes communities in Arncliffe, Kingsgrove, Beverly Hills, St Peters and Alexandria. These health risks are rated as HIGH for all areas. Mitigation is recommended, but no firm information is available about who might receive this 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 and communities cannot be forced to accept this.

This EIS shows hundreds of homes along the project route will experience noise during construction and operation at unsafe levels that can damage health. In fact the real impact is likely to be far worse than the results provided in this EIS, because noise monitoring was only done at Beverly Hills and St Peters. 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 unreliable.

Tunnelling would cause vibration and damage to homes. The EIS says it will only be for a “short period”, but does not say what this short period is. In some cases, tunnels and tunnelling would take place around 20m below people’s homes. This is not acceptable, particularly given the collapse of buildings that took place during the Lane Cove Tunnel’s construction, and the legal action residents above Brisbane’s Airport Link are now being forced to take after experiencing property damage.

PUBLIC CONSULTATION AND TRANSPARENCY

WestConnex and the New M5 has been characterised by a lack of transparency and accountability by the proponent. This is unacceptable for any project funded by taxpayer money and particularly a project of this size which would see communities and endangered species destroyed, thousands of people evicted from their family homes and businesses, and billions of dollars of public money spent and therefore diverted from projects that could benefit NSW more.

The planning processes surrounding the project have key parts of the business case remain hidden from public scrutiny, even though it is being funded by taxpayer money. Homes and businesses are being forcibly acquired, multi-million and/or billion-dollar contracts have been let, and construction works have occurred place before any planning approvals are granted for this project. The entire WestConnex, including this project, has been characterised by poor governance, and a complete lack of transparency and accountability. Community consultation has also taken place only after detailed plans have been drawn up, so the general public has little to no input on a project that will affect hundreds of thousands of people’s lives for many years to come.

The fact that the State Government has already signed multi-billion dollar contracts for WestConnex before this EIS was even placed on public exhibition undermines community confidence that this is a genuine consultation process. More so, by this action alone, it could appear the decision has been reached by the State Government. Why would they sign legally enforceable contracts before the EIS was publicly exhibited and the Public had their say?

This action by the State Government casts huge doubts on the legitimacy of the community consultation process, and places unreasonable pressure on the Department of Planning and Environment to approve this project regardless of its flaws.

The analysis of alternatives provided by AECOM in this EIS provides no solid evidence for the conclusions drawn. I strongly object to this superficial ‘analysis’, which consists of little more than bald claims rather than a serious investigation of how alternatives such as improved public transport, better traffic management and freight on rail could reduce congestion more effectively than the WestConnex New M5.

CONCLUSION

It is alarming that costs for WestConnex and the New M5, a taxpayer-funded project, are blowing out at the rate of more than $2 billion a year. When WestConnex was announced in 2012, it was one toll road with a price tag of $10 billion; it is now a series of toll road projects that encompasses WestConnex and additional projects such as the Southern Extension and Sydney Gateway that will now cost $16.8 billion. At this rate the final price tag will be well in excess of $20 billion even before the cost of financing large loans, addressing its social, health and environmental impacts, and covering the (inevitable) shortfall in toll revenues is taken into account.

If this $16.8 billion was spent on public transport and effective road management, a project like WestConnex would not be necessary. The $16.8 billion and rising that would be spent on WestConnex is money that would be taken away from hospitals, schools, regional roads, and the public transport improvements that are urgently needed – not just in western Sydney, but many parts of regional NSW.

For all the reasons above (and more that I have not had time to mention) the proposed WestConnex and the New M5 it is clear this project is not in the Public's interest. I ask you to not to approve this project.

I fully support submissions by:

- Chris Standen
- WestConnex Action Group
- The NSW Greens

If this project is approved it will clearly show to the people of NSW that the State Government is not acting in their best interests ie by spending taxpayers money where it will benefit the Public most. Furthermore the flawed modelling, lack of transparency, denial of Public access to important documents, contracts signed before Public input, all will rightfully be seen as politically and morally questionable. If this project is good for the Public surely the State Government should wait until the Public have had their input before ANY decision is reached or contracts signed?

Yours sincerely

Sandra Newham

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[redacted]

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[redacted]

Name: Barbara Lewis
[redacted]

Address:
[redacted]

Maroubra, NSW
2035

Content:
Climate change and damage to our Earth's ozone calls for less, not more, motoring traffic. I am unable to recall a single example of efforts the NSW or federal government have taken to contribute to this effort. And now, this M5 East Motorway will only ease conditions for motorists. At what point, will these governments begin to 'put the squeeze' on motorists and start to require a change of road usage behaviour? Currently, the only viable cycle route between my suburb (Maroubra) and Marrickville, a foodie and entertainment hub, is to ride along Euston Rd and through the St Peter's/Princess Highway intersection. At the very least, if public objection to this massive road construction continues, I, on behalf of all my cycling friends, implore the NSW government to spend the miniscule additional amount to simultaneously construct the M5 East Green Link, through the Wolli Creek Valley to encourage and facilitate Active Transport options between south western Sydney, Mascot airport and the CBD.

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Name: Fiona Roderick
[redacted]

Address:
[redacted]

Newtown, NSW
2042

Content:
I enjoy walking around Sydney park and i love Newtown. I think West Connex is totally disastrous for this city and more public transport should be created. West Connex will kill King Street, I cannot see where this traffic is going to go, already roads are blocked. Sydney park is going to be affected, this park gives so much pleasure to people, so much money has been spent on it, it is REALLY lovely. No please don't do this. its a crime.

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Content:
To whom it may concern,
Before reading my submission I strongly recommend you watch the documentary film The Human Scale
http://thehumanscale.dk/thefilm

This film was shown at the 2014 Sydney Film Festival and proves with examples from all around the world, how building more roads will only create more car and truck traffic.

In the promotional material WestConnex have sent us about the proposed motorway, the promised 'benefits' mention "Better and more reliable trips", "Easing congestion" and "relief for motorists". All these things are meant to encourage more cars, when what we as a city need most to do is REDUCE the number of cars on our roads with disincentives for driving and incentives for using public transport or cycling.

The biggest relief for motorists would surely be not to have to drive so much! To this extent we need to ask why people are driving in the first place and address those issues such as
creating more job opportunities closer to people's homes - eg. in western Sydney - with better / faster public transport so that they can get to work or study without cars!

The proposed motorway will create enormous problems for those of us who have chosen to pay more (rent or mortgages) and live in the inner city close to public transport, as our relatively quiet communities will be inundated with cars spilling out of the St Peters interchange.

Our local environment in Erskineville will be affected by large amounts of car pollution and noise from the increase in traffic in our local streets. And the City Farm now being built in Sydney Park will also be negatively affected - so much for buying locally grown organic produce when right next to it will be thousands of extra polluting vehicles driving by every day.

How is this project going to ensure that the local environment is protected if there is no plan for what happens to the cars when they come out of the interchange? King St already has too many trucks going down it, we do not need more vehicles!

I strongly object to taxpayers money going to this project and ask that there be a complete rethink of future transport options in our city which are sustainable and not based on outdated assumptions that we can keep adding more private vehicles and roads as our population increases.

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Content:
I strongly object to the $16.8 billion being spent on this poorly planned road system instead of improving our public transport systems.
I object to the increased traffic that will flow from the WestConnex onto our already congested local roads such as my own street May St, St Peters. As well, other local roads such as King Georges, Stoney Creek, Canterbury, Forest and Moorefields Rds will have added congestion.
I strongly suggest the department look at other alternative transport infrastructure that is environmentally sustainable and economically viable.

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Content:
What a start to a new year!

West Connex and the Sydney Motorway Corporation want to devastate our beloved Sydney Park. And it looks like Baird and his dinosaurs are fully behind it.
Permanent damage to Sydney Park, St Peters, the Inner West and the most interesting and character filled parts of dear Sydney.
And for what?
A dirty toll road from the past. Pollution, mindless traffic jams, ruined suburbs and school sites ,that nobody with any sense of the future wants.
I will spell it out - Look After Our Green Spaces!

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Name: Matt Mushalik
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Address:
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Epping, NSW
2121

Content:
Please find attached as PDF

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http://crudeoilpeak.info
Crude Oil Peak
#1 in Monitoring the Global Crude Oil Peak

New M5 tunnel
Another mushroom candidate

A virtually empty tunnel (from a promo video)

Prepared by Matt Mushalik 29/1/2016 mushalik@tpg.com.au @crudeoilpeak

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Introduction

My submission on the M4 and M4East

http://crudeoilpeak.info/wp-content/uploads/2015/11/WestConnex_Nov_2015_submission_M_Mushalik.pdf

covered following topics:

(1) M4 and M4East tunnel not financially viable
(2) Average Weekly Traffic (AWT) growth
(3) Huge Risks
(4) Peak oil. Where are we?
(5) Next oil change: Arab Spring in Saudi Arabia
(6) Refinery Closures
(7) No Asian Century

These points have all been conveniently ignored. I will not repeat them here. They apply equally to all phases of WestConnex. I cannot each time start from Adam and Eve.

I do not have the impression that my M4 submission was read, let alone acted upon, because the same mistakes I criticised have been repeated, if not carbon copied, in the M5 EIS. If departments and their political masters do not want to know oil facts and connect the dots with geo-political events and preparations for war, they cannot be helped. They will only learn them, when it is too late.

Insofar the minimum purpose of this submission is to document historic evidence the NSW government chose to ignore. This information will be moved to the I-told-you-so menu of my website at the appropriate time. There are already 2 items there: the Clem7 and the AirportLink tunnel in Brisbane. Number 3 will be NorthConnex for which I also wrote a submission

Geo-strategic situation in Middle East

Humiliation of US marines Jan 2016

This does not look good. Not like a global superpower which can guarantee the flow of oil through the Persian Gulf.
And Sydney is still planning and building oil dependent road tunnels? It seems the NSW government is living in La La land. And in case no-one has learned a lesson:

24/1/2016 Iran will give a crushing response to any possible act of aggression against the country, says a commander.

Speaking during a live televised interview on Saturday, Brigadier General Hossein Salami, the second-in-command of the Islamic Revolution Guards Corps (IRGC), said Iran's Armed Forces are determined to defend the Iranian territorial integrity and national interests in case of any invasion. He added that the recent capture of 10 US Marines, who had trespassed on Iran's territorial waters, was proof of the power of Iran's naval forces, describing it as a clear victory for Iran at a crucial juncture.

The IRGC commander said this incident was a determining development in the region, because it made all foreign forces face a new reality and change their assessment of the power of the Islamic Republic of Iran in defending its territorial integrity and vital interests.

“We will continue to boost our defense capability and our missiles will be updated day by day,” Salami said, adding that Iran reserves the right to develop conventional weapons in order to “defend its independence and territorial integrity.”
http://www.presstv.ir/Detail/2016/01/24/447079/Iran-US-IRGC-salami/

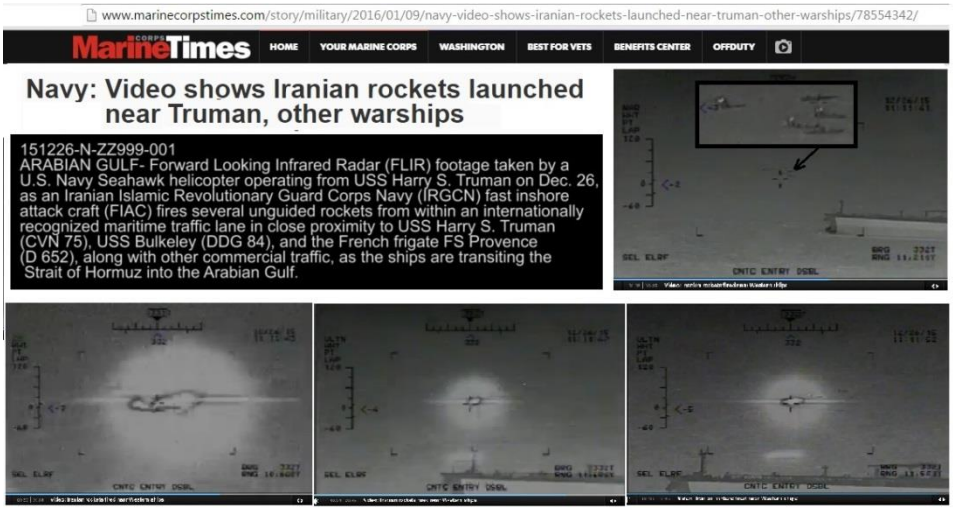
Mock-ups?

http://217.218.67.231/Detail/2015/11/29/439585/Iran-Navy-Dehqan-Sayyari-Qadir-missiles

But not this one: in October 2015 Iran test fired missiles in contravention of UN resolutions

http://www.foxnews.com/politics/2015/12/07/iran-tests-another-mid-range-ballistic-missile-in-breach-un-resolutions.html

During X’mas Iran launched rockets close to the US aircraft carrier Truman.

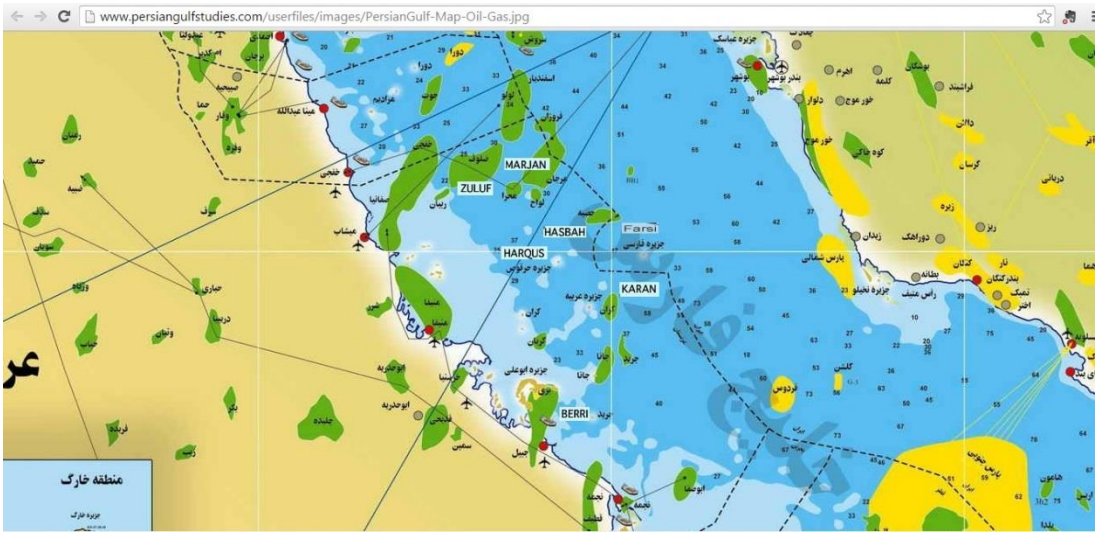


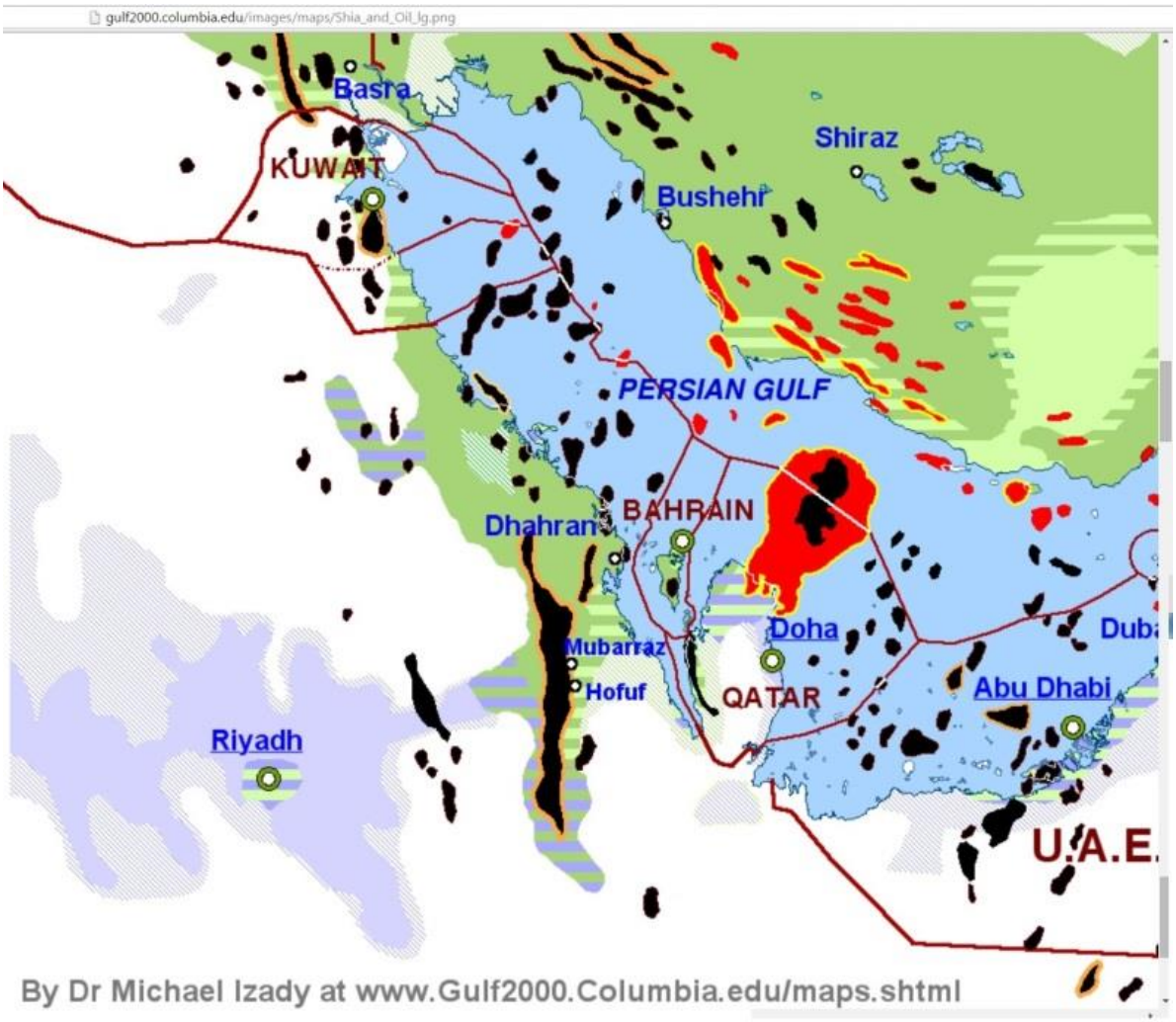
Iran unveils second underground missile, likely to irk U.S.

5/1/2016 The Iranian missiles under development boast much improved accuracy over the current generation, which experts say is likely to improve their effectiveness with conventional warheads. The Revolutionary Guards' second-in-command, Brigadier General Hossein Salami, said last Friday that Iran's depots and underground facilities are so full that they do not know how to store their new missiles
http://news.yahoo.com/iran-unveils-second-underground-storing-emad-missile-134508852.html

What comes next? The revolutionary guards are already planning the next move. Oil prices are too low.

Oil maps the NSW government doesn't want to look at:



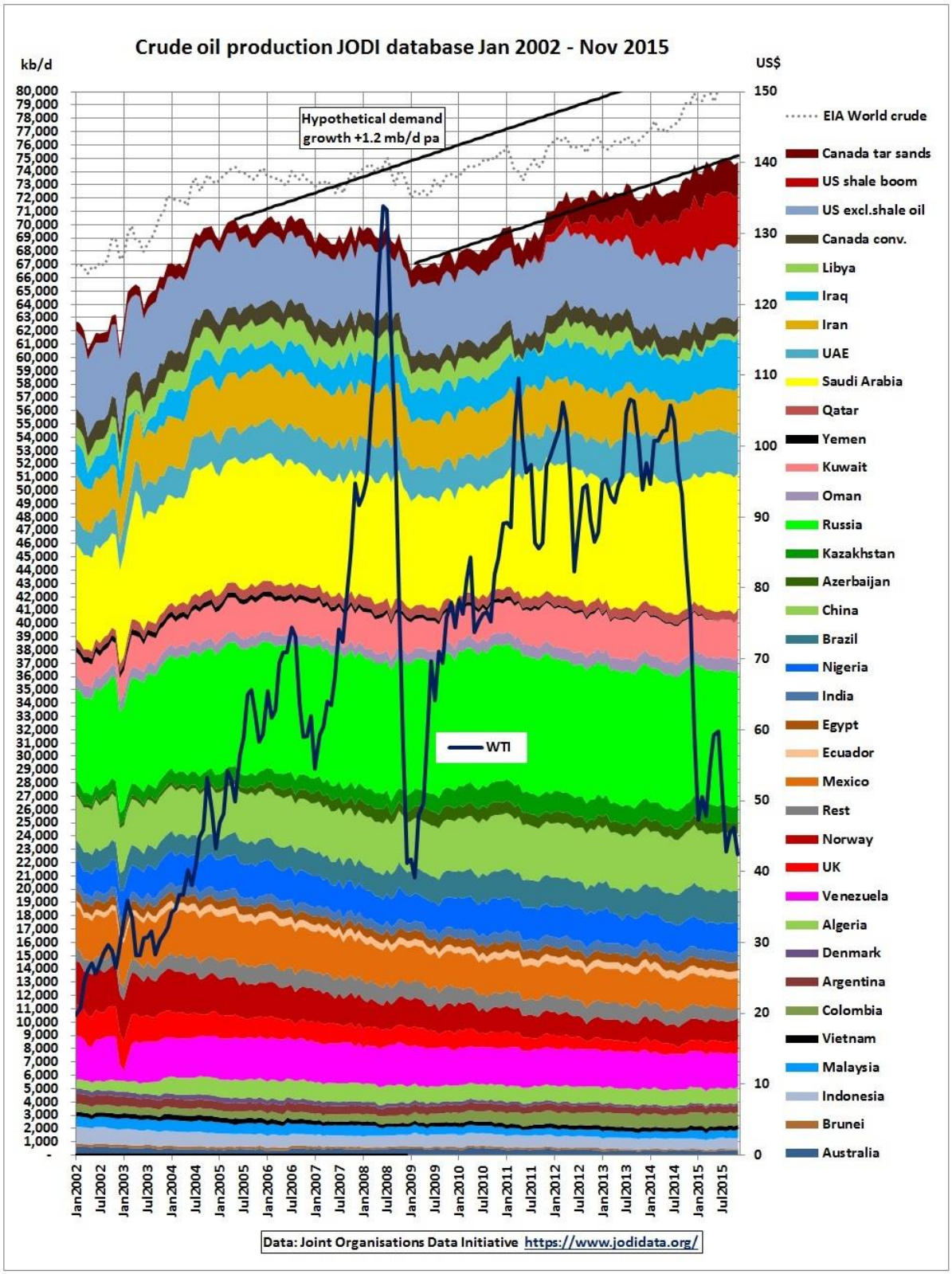


The above incident happened near the Farsi island. The above maps show the location of gas and oil fields in the Persian Gulf area and the boundaries between oil-producing countries. You look at the future offshore theatre of war as onshore oil fields are depleting.

Libya

ISIL revenge

Peak oil Update



We use JODI data (latest up to Nov 2015) because EIS data have been delayed (latest Jun 2015). JODI data are not complete for all countries so the dotted EIA curve is higher but the trends are the same.

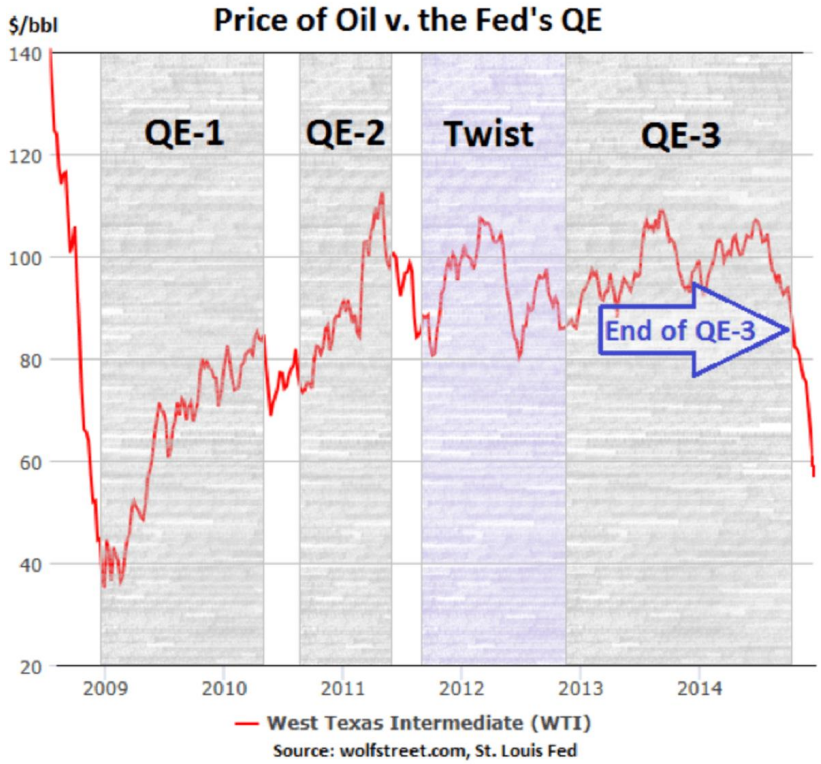
The peaking of global crude oil production is a process with several phases, NOT a single event which can be easily identified when it happens (seen only in hindsight anyway). It is very clear that peaking started in 2005. Limited production against an average demand growth of 1.2 mb/d pa resulted in a supply gap of around 4.5 mb/d by mid 2008, resulting in skyrocketing oil prices. This contributed to the financial crisis.

This reset the demand to a lower level in 2009. Stimulus packages and later quantitative easing helped to bring oil demand on its previous growth path, albeit from that lower 2009 level. Production went back to 2005 levels and prices went up, too, meaning that high oil prices were required to maintain a certain production level. Quantitative easing and cheap money resulted in investments in the US shale oil industry which was hyped up as an energy revolution – although decline rates in shale oil wells are astronomical. After drilling a $8 million well and producing it for 2-3 years, 80-90 % of the oil is gone. Cheap money and high oil prices continued, fuelling a belief that this show could go on forever and ultimately lead to the United States' self-sufficiency in oil, a myth which is still widespread in the media even today, including ABC TV.

Why oil prices are low

Then oil prices dropped unexpectedly in mid 2014. Many explanations have been forwarded:

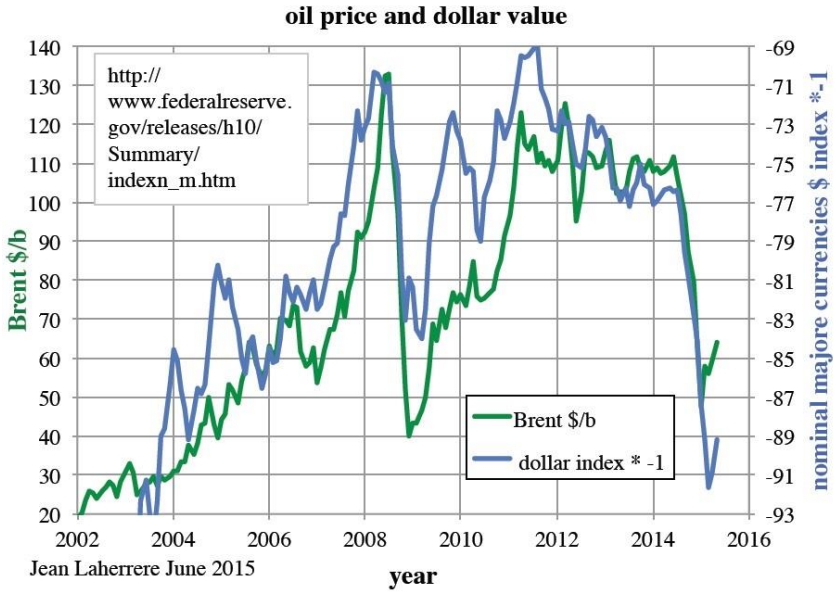
(1) The firsts drop coincided with the Federal Reserve's announcement to taper off quantitative easing, signalling that interest rates will go up. But zero interest rates were one reason why investments were done in the oil patch, under the assumption that oil in the ground would always be a safe collateral and that oil prices would remain high indefinitely to justify extracting that oil



Market manipulation article by Chris Cook, energy market analyst, Institute for Security and Resilience Studies at the University College, London

https://theconversation.com/oil-crash-is-this-the-end-of-a-long-period-of-inflated-prices-36088

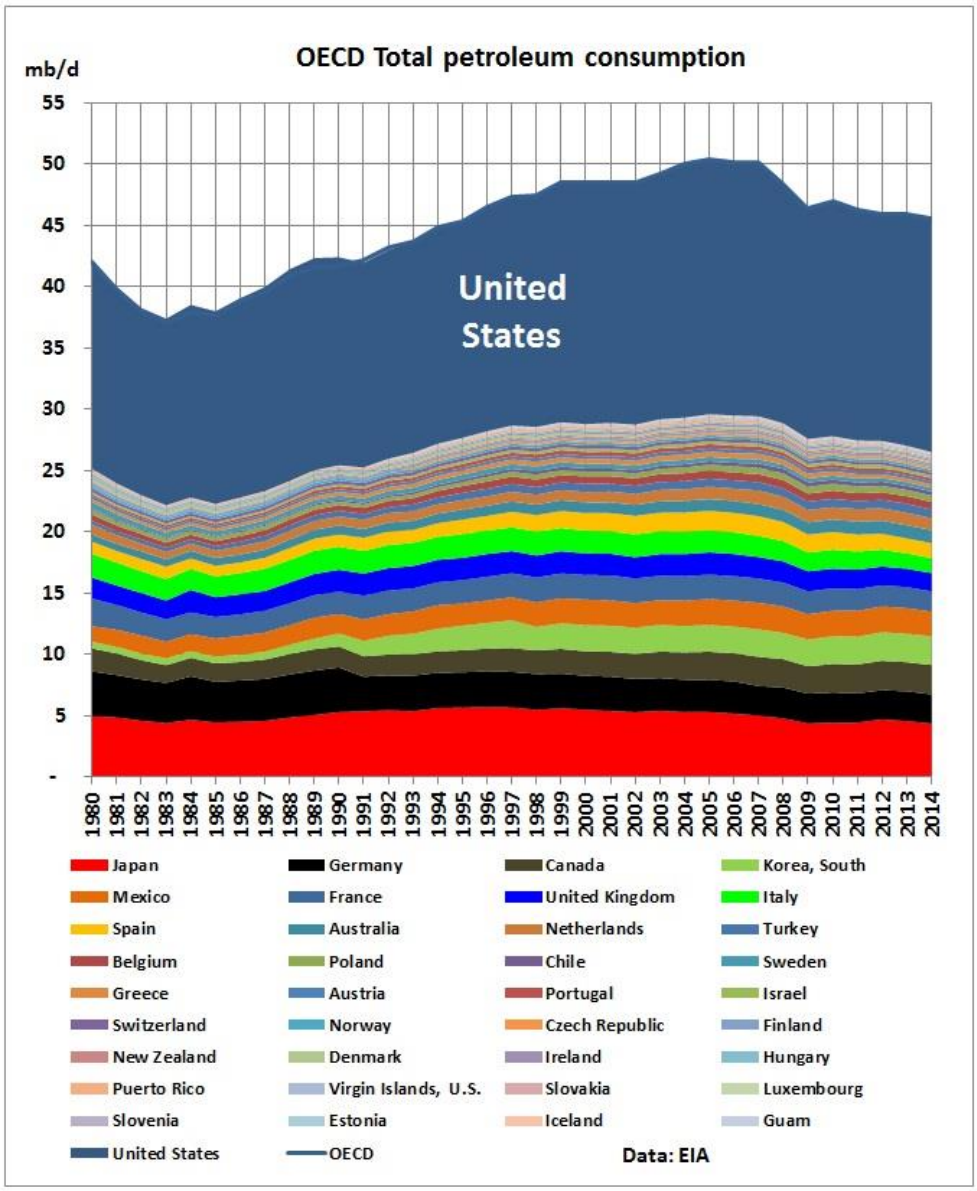
(2) At the same time, the US dollar went up. There is an inverse relationship between US$ and oil prices



(3) Continuing oversupply of expensive US shale oil, helped initially by previous hedging but most importantly driven by the need to service debt

(4) Unwillingness of OPEC to play the role of a swing producer

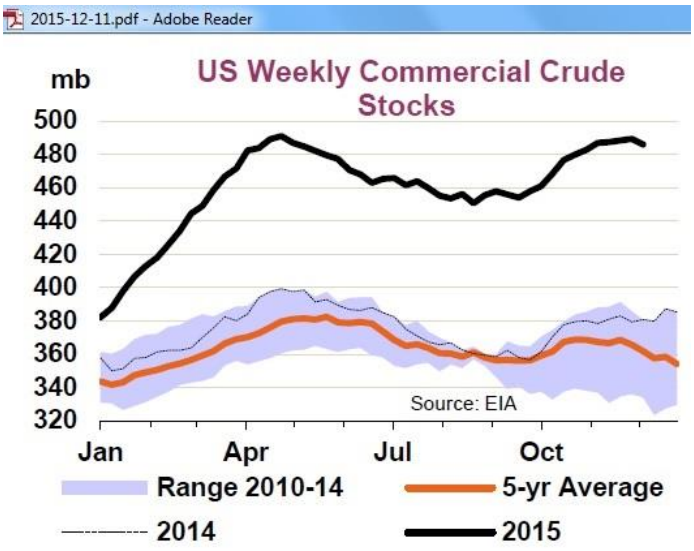
(5) Weak demand, especially from OECD



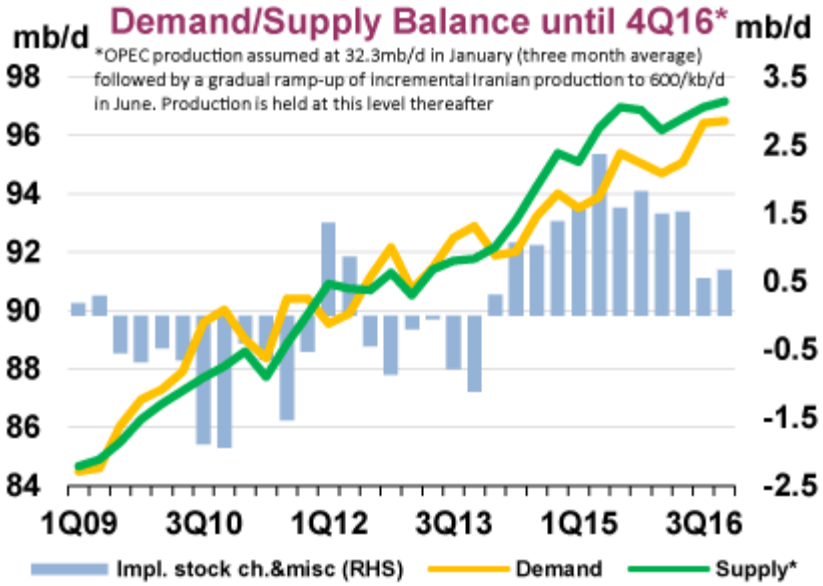
http://www.eia.gov/cfapps/ipdbproject/iedindex3.cfm?tid=5&pid=5&aid=2&cid=CG5,&syid=1980&eyid=2014&unit=TBPD

OECD consumption started to peak – you guessed it – in 2005, the year in which crude oil production started to peak. The drop in 2007 is especially pronounced in the US. It is an irony of history that the US shale oil boom came 4 years too late. Because it needed helicopter money first!

(6) Focus on inventories



(7) The latest IEA Oil Market report has discovered an imbalance of demand and supply, narrowing down by end 2016



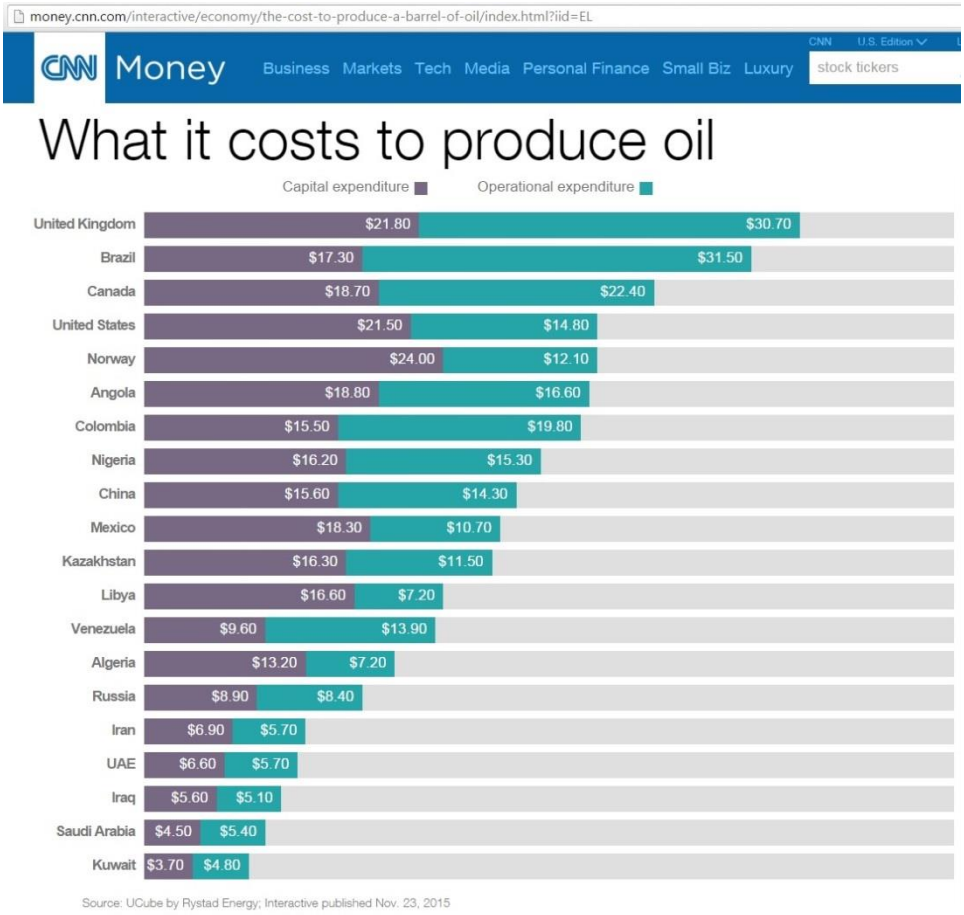
https://www.iea.org/oilmarketreport/omrpublic/

https://www.iea.org/media/omrreports/2016/0116/0116image3.png

No doubt the debate about the causes of the oil price drop will keep the commenters busy and will fill many websites and books. What matters now: what is the next peak oil phase?

What it costs to produce oil

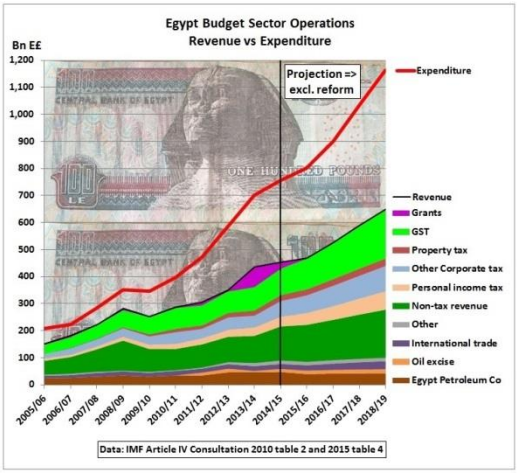
First we must understand what it costs to produce oil (many different tables available on web)

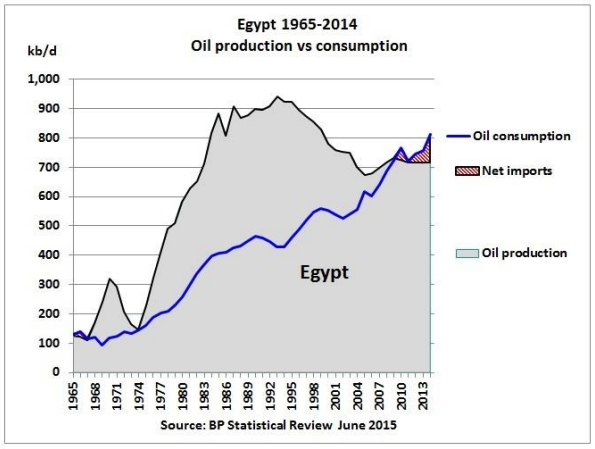


http://money.cnn.com/interactive/economy/the-cost-to-produce-a-barrel-of-oil/

Of course this is not the whole story. Many oil producing countries need oil revenues to fund their budgets and maintain their external accounts.

23/12/2015 Egypt budget and current account deficits - Can Saudi Arabia bail out Cairo?





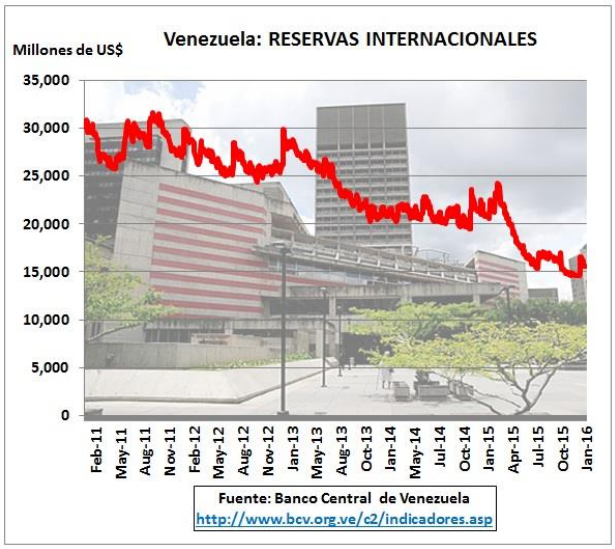
In Egypt, expenditure is far above revenue (left), now a net importer of oil (right)

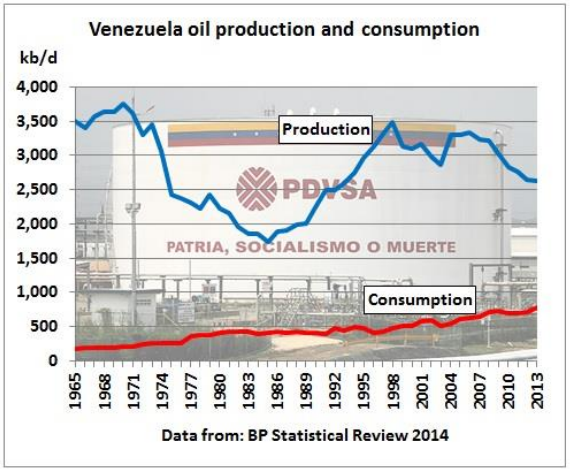
http://crudeoilpeak.info/egypt-budget-and-current-account-deficit-can-saudi-arabia-bail-out-cairo

4/12/2015 Egypt update: Net oil importer and Chokepoints
http://crudeoilpeak.info/egypt-update-net-oil-importer-and-chokepoints

4.5 mb/d flow through the Suez canal and the Sumed pipeline.

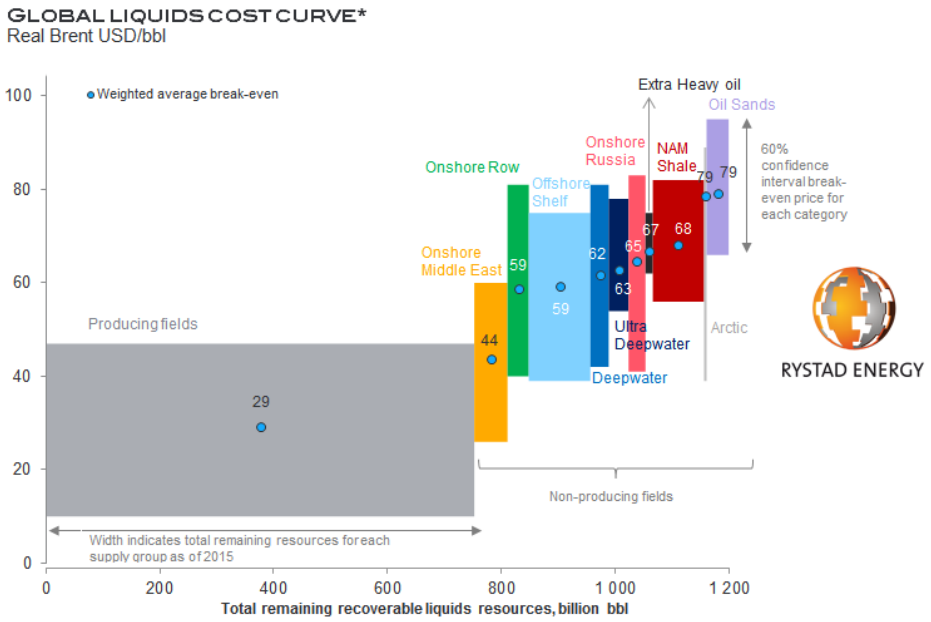
One of the next dominos is Venezuela (2.5 mb/d) http://crudeoilpeak.info/venezuela-peak





23/1/2016 IMF Sees Venezuela Inflation Rocketing to 720 Percent in 2016
http://www.bloomberg.com/news/articles/2016-01-22/imf-sees-venezuela-inflation-rocketing-to-720-percent-in-2016

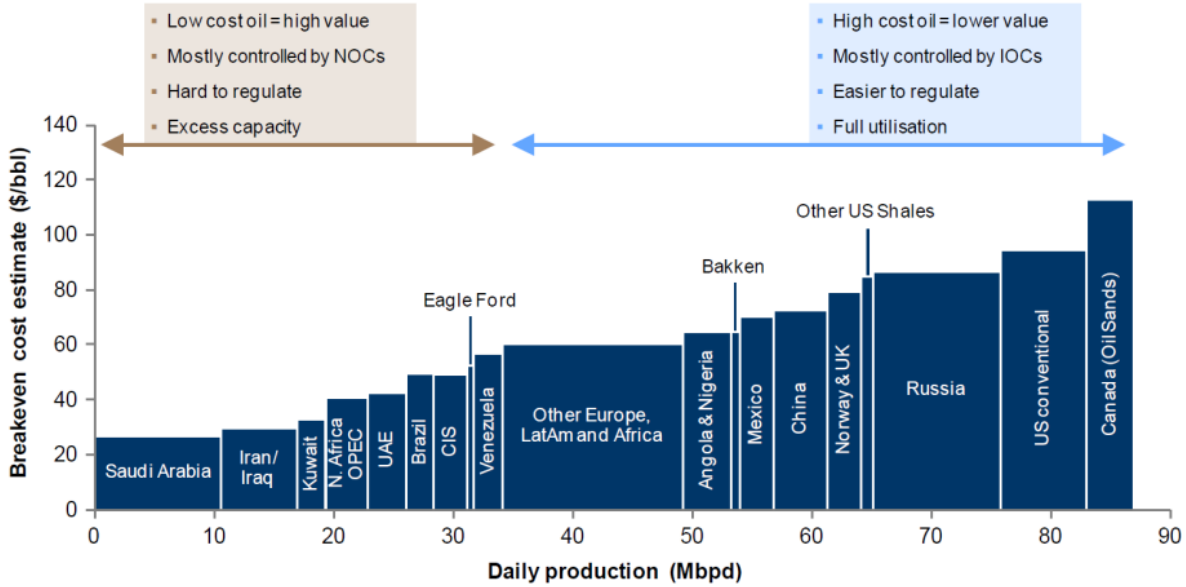
So what is the remaining oil cake to eat through? Here is a graph from Rystad Energy



*The break-even price is the Brent oil price at which NPV equals zero using a real discount rate of 7.5%. Resources are split into two life cycle categories: producing and non-producing (under development and discoveries). The latter is further split into several supply segment groups. The curve is made up of more than 20,000 unique assets based on each asset's break-even price and remaining liquids resources in 2015.
Source: Rystad Energy UCube September 2015

http://www.rystadenergy.com/AboutUs/NewsCenter/PressReleases/global-liquids-supply-cost-curve

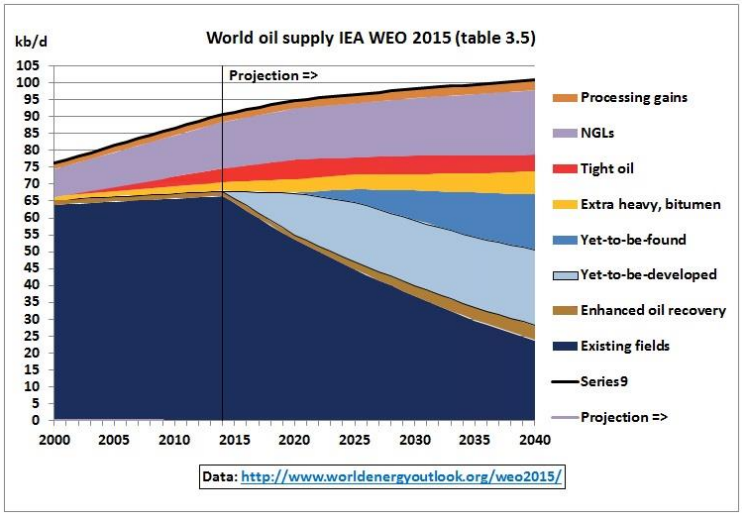
Note these are resources, not proved or probable reserves. They include crude oil, condensate and NGLs. The producing fields can't increase production



This is another graph on break even oil prices by Alliance Bernstein of October 2014. Add budget balance costs for oil producers with nationalised oil companies whose profits are used by governments. For example:

18/10/2015 Saudi Arabia's fiscal break-even oil price to be around $US 100 mark for the foreseeable future
http://crudeoilpeak.info/saudi-arabias-fiscal-break-even-oil-price-to-be-around-us-100-mark-for-the-foreseeable-future

So the era of cheap-to-produce-oil is over. Cheap oil the motorists enjoy is only good if oil companies can still make reasonable profits. With $30 oil, this is not currently the case. The main problem now is that absolutely necessary investments to offset natural decline in legacy oil fields have been shelved.



This graph using data from the IEA World Energy Outlook, November 2015, shows the decline in existing fields and how hard it will be to offset that decline.
http://www.worldenergyoutlook.org/

Note the horizontal line of conventional oil has been designed by adjusting the triangle “Yet-to-be-found”. This is of course the (hidden) peak oil scenario, with a very flat and long peak. There is no guarantee that this can be achieved. And the yet-to-be-developed area is under danger if timely investments are not done.

The IEA warned in Davos 2016 of higher oil prices in a few years’ time

World Economic Forum

The Transformation of Energy

The moderator of this session was Daniel Yergin, someone who enjoys debunking peak oil.

Davos 2016 - The Transformation of Energy

3:24
Fatih Birol: "For the oil markets what worries me the most is that: last year we have seen oil investments in 2015 decline more than 20%, compared to 2014, for the new projects. And this was the largest drop we have ever seen in the history of oil. And, moreover, in 2016, this year, with the $30 price environment, we expect an additional 16% decline in the oil projects, investments. So, we have never seen 2 years in a row oil investments declining. If there was a decline 1 year, which was very rare, the next year there was a rebound"

Daniel Yergin: "What does that lead you to?"

Fatih Birol: "this leads me to the very fact that in a few years of time, when the global demand gets a bit stronger, when we see that the high cost areas such as the United States start to decline, we may well see and upward pressure on the prices as a result of market tightness. So my message, my 1st message is: don't be misled that the low oil prices will have an impact on the oil prices in the market in a few years’ time"

Daniel Yergin: "Just to put a number on that. Our numbers at IHS, 2015-2020 **we see a 1.8 trillion dollar decline in upstream oil and gas investment**"

38:55
Fatih Birol: "...Middle East. If oil prices remain at $30 in 2016, an equivalent of 20% of the Middle East GDP will be erased. It's a big thing. For Russia, about 10% of Russian GDP will be erased if the prices remain at this level. At the same time for Europe, for China, for India it's an economic stimulus"

Yergin: "If you look at the global financial markets something is happening there"

"Birol: "It would have been worse if we were in this financial situation with higher oil prices"

Yergin: "So 2 different things going on at the same time"

Birol: "Exactly. But 2 things: one, as I mentioned, these low oil prices and the unprecedented low investments mean we are having a fertile ground in the future for strong rebound in the

prices. Second, topic of our discussion, transformation of energy, low oil prices are complicating the transformation. So we have to put this also in the context and therefore a need for governments to be very awake in the presence of low oil prices if they are serious about Paris"

Yergin: "So what should they do?"

Birol: "if they have new policies, they have to stick to them. They shouldn't get relaxed because the energy prices are low they don't have the impetus of saving money"

https://www.youtube.com/watch?v=5eBybPfZ4Lg

http://www.weforum.org/events/world-economic-forum-annual-meeting-2016/sessions/the-transformation-of-energy

Subprime oil

Of course financial and oil markets are not separate, they are linked.

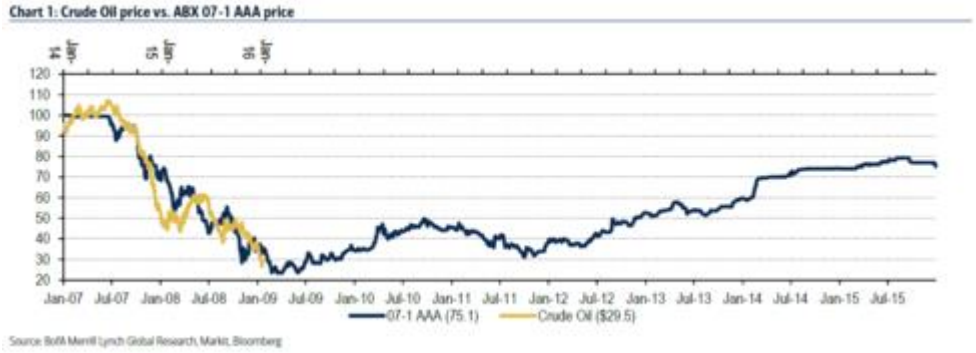
So Yes, the Oil Crash Looks a Lot Like Subprime

26/1/2016

One year ago, analysts at Bank of America Merrill Lynch drew a parallel between the subprime mortgage crash and the disorderly fall in the price of oil.

Led by Chris Flanagan, a veteran of the securitization space, the team drew attention to Markit's ABX Index, better known as the mother of all synthetic subprime credit indexes.

The pattern of the decline in the price of oil that began in mid-2014 is remarkably similar to the 2007-2009 pattern of the price decline of ABX, the credit derivative index that referenced subprime mortgages and, ultimately, the U.S. housing market (Chart 1). The ABX history suggests that oil will see more declines in the next couple of months and find a floor somewhere in the low 20s in the March-April time frame. Both the duration of the decline (1.5+ years) and the scale of the decline (100 neighborhood starting price down to the sub-30 neighborhood) are similar. Given that both housing and oil prices were fueled to spectacular heights in the two periods by massive credit expansion, it's probably more than just coincidence that the respective "bubble" bursting patterns are so similar.



Consider how things tend to work. Denial on what constitutes fair value is a big component of bubbles, on the part of both market participants and policymakers. When perceived "bubbles" burst, markets take their time in steadily shredding views of the perception of

fundamental value, as prices move lower and lower. Along the way, many will cite “technical factors” as the cause of the decline, which in some way suggests the price decline may not be real when in fact it is all too real. In the end, the technicals drive the fundamentals, as credit flees and borrowers go bust, and a feedback loop lower kicks in. Lower prices beget accelerated selling, as asset owners need to raise cash. It could be margin calls or it could be producer selling needs, it doesn’t really matter: the selling becomes inevitable and turns into forced selling.

The point here is not that oil is necessarily the new subprime crisis per se but that the recent action in the price of crude resembles nothing if not the bursting of a bubble and the sudden realization that the asset has been overvalued for too long. More worrying for oil investors will be BofAML's idea of forced selling. As Flanagan notes: "The systemic margin call of 2008 seems to be back for now, albeit to a far lesser degree."

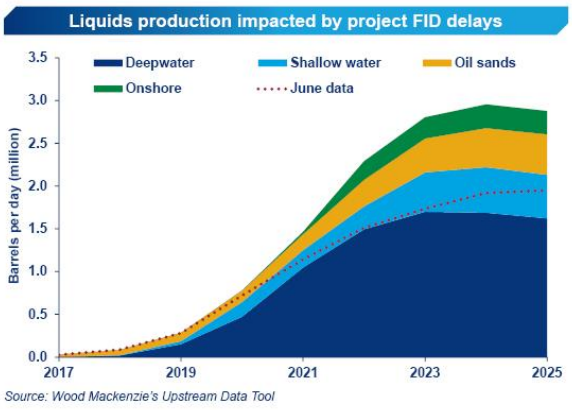
http://www.bloomberg.com/news/articles/2016-01-25/so-yes-the-oil-crash-looks-a-lot-like-subprime

Well, the world can live with vacant housing in derelict suburbs but it can’t live without oil. So the situation is very dangerous.

Threat to $1.5 Trillion of New Projects
21/9/2015
About $1.5 trillion of potential investment in new oil projects isn’t viable with crude prices at $50 a barrel, highlighting the need to reduce costs, according to consultant Wood Mackenzie Ltd.
The proposed projects, including spending on North American shale, are “now out of the money, or in starker terms, uneconomic at $50 oil,” James Webb, upstream research manager at Wood Mackenzie, said in a statement Monday. “This spend is very much at risk.”
While operators want to cut costs by 20 percent to 30 percent on new projects, supply-chain savings will only achieve cuts of 10 percent to 15 percent on average, according to Wood Mackenzie.
http://www.bloomberg.com/news/articles/2015-09-21/oil-price-rout-seen-as-threat-to-1-5-trillion-of-new-projects

Here is an assessment how much oil is lost over time as a result of CAPEX deferrals:

Pre-FID 2016: US$380bn of capex deferred

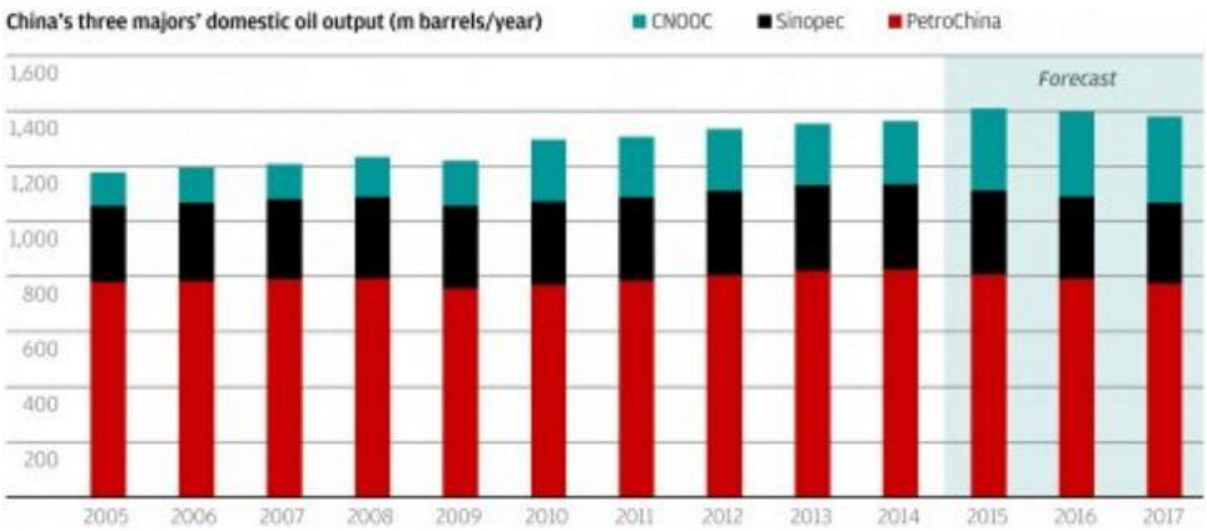


14/1/2016 http://www.woodmac.com/analysis/PreFID-2016-USD380bn-capex-deferred

China

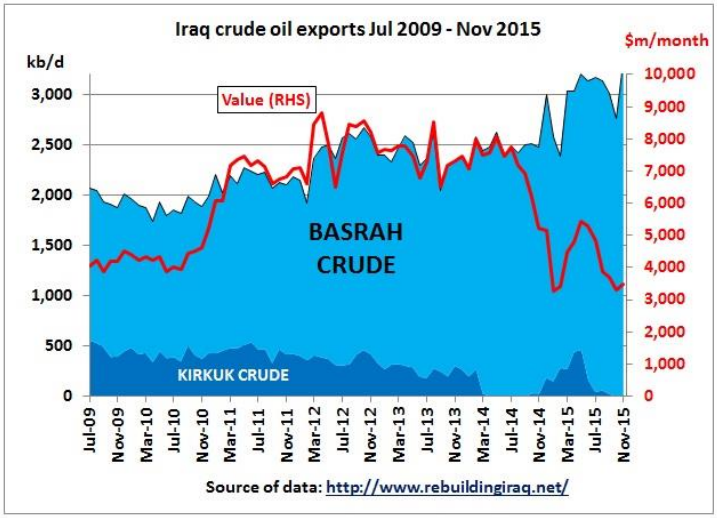
Australia wants growth of a Chinese middle class? Go for it!

China peak oil, 2015 is the year

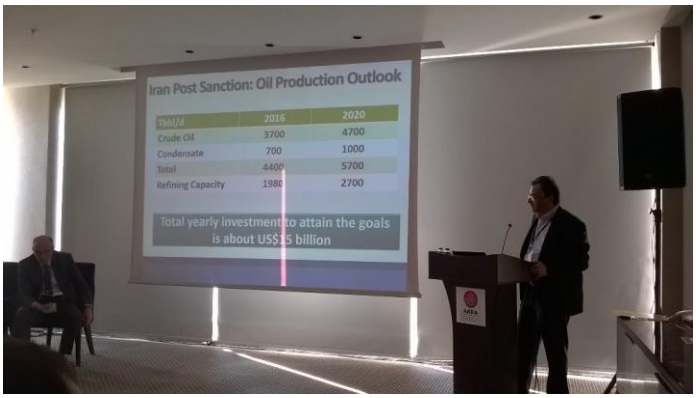


http://www.scmp.com/business/commodities/article/1881188/chart-day-no-turning-back-chinas-oil-production

Wild card Iraq

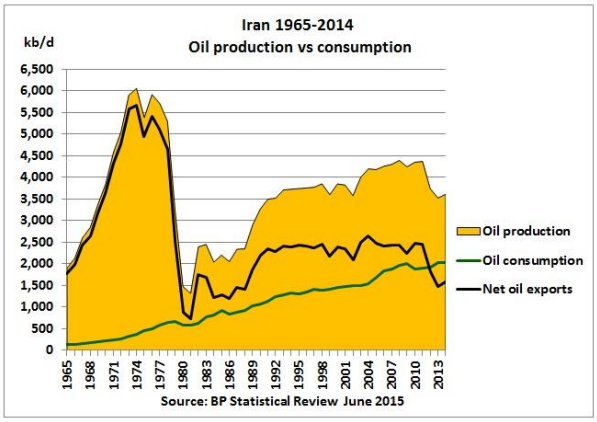


Wild card Iran



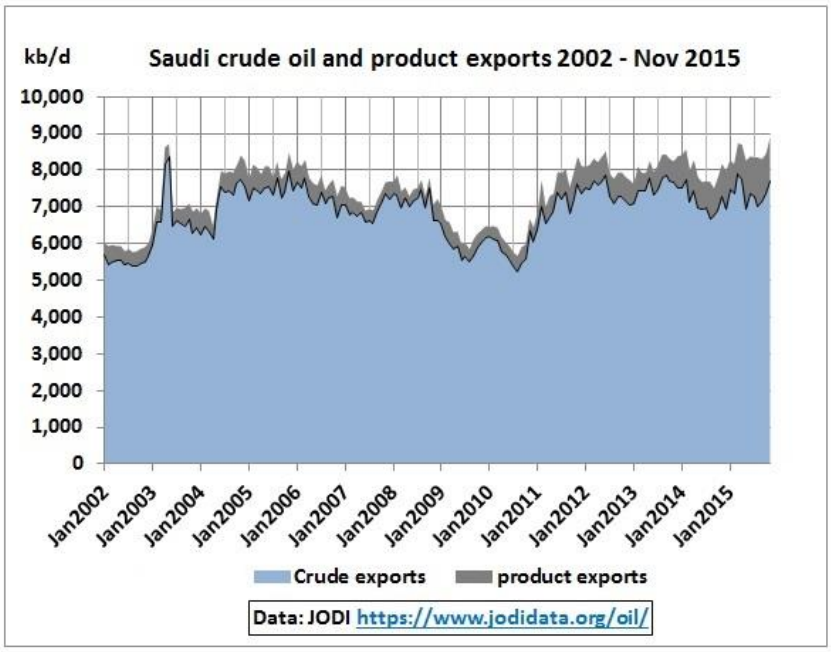
1 mb/d additional oil (4.7 mb/d by 2020)
Antalya presentation at the Cuttingedge conference January 2016
http://www.cuttingedgeconferences.com/iran/program
https://pbs.twimg.com/media/CZU6S0PUYAAHX3X.jpg:large

This optimistic outlook will bring Iranian oil production just 400 kb/d above pre-sanction levels.



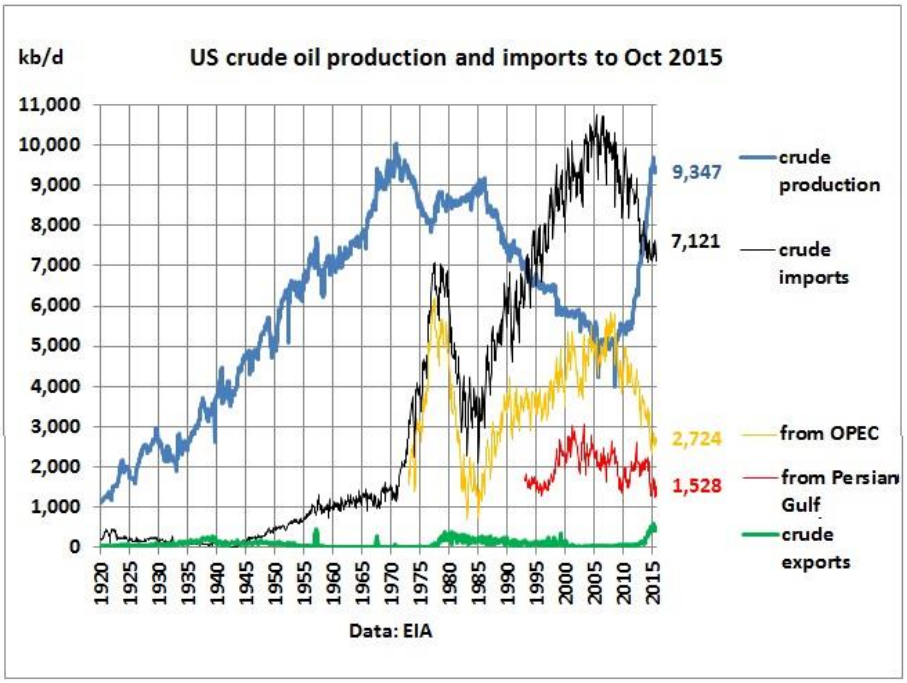
Debunking Myths

Saudi Arabia has NOT flooded market with oil



Fact: Saudi liquids exports remained on bumpy plateau for 4 years, hardly exceeding 2005 levels. That is also peak oil.

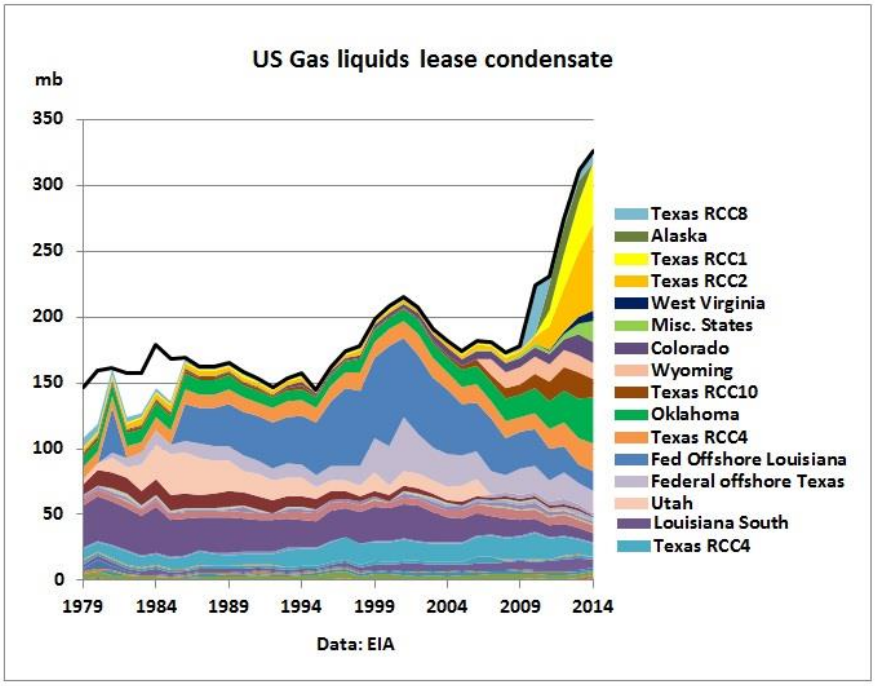
US is NOT self sufficient in crude oil



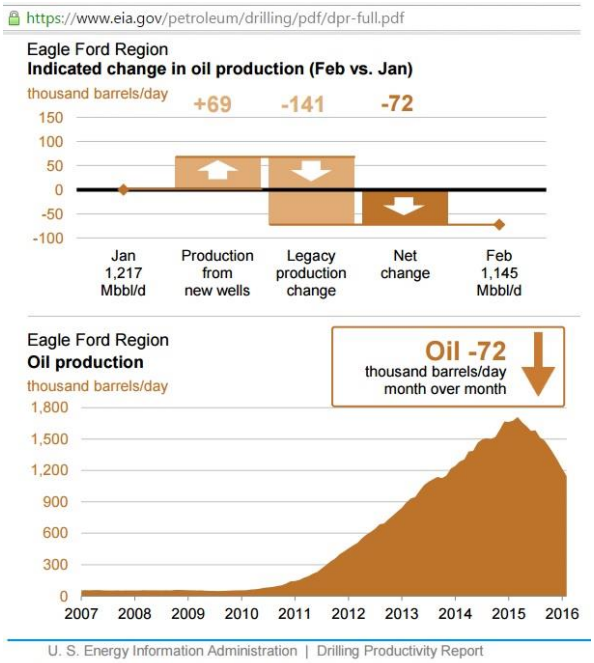
The US still imports 7 mb/d. This 43 % of crude oil requirements

More details are here:

21/1/2016 The myth of US self-sufficiency in crude oil
http://crudeoilpeak.info/the-myth-of-us-self-sufficiency-in-crude-oil



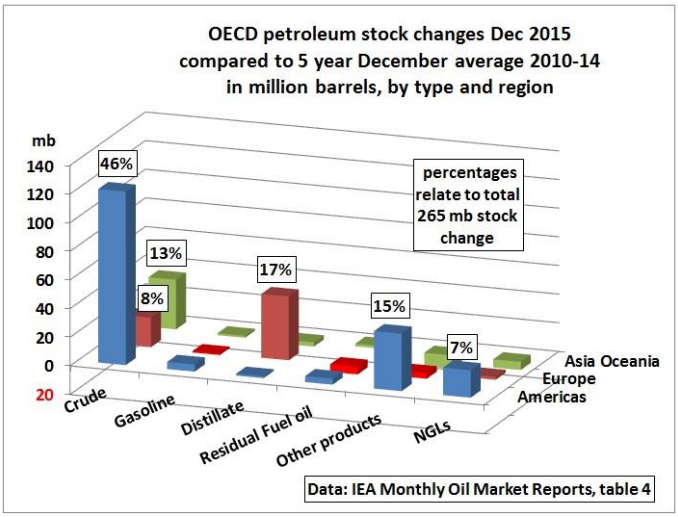
Shale oil boom created surplus of less versatile condensate, clogging up inventories



Note that decline of -141 kb/d is now far exceeding additional production from new wells of 69 kb/d
https://www.eia.gov/petroleum/drilling/pdf/dpr-full.pdf

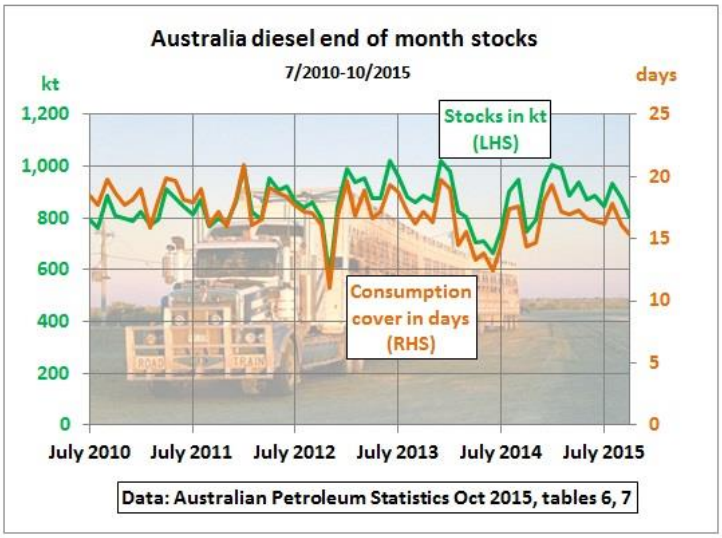
In another shale oil area, Bakken in North Dakota, rising unemployment:

Oil glut is not global



2/3 of additional stock is in the US. More details are here:

29/12/2015 Where actually is that much-hyped global oil glut?
http://crudeoilpeak.info/where-actually-is-that-much-hyped-global-oil-glut
And definitely there is no oil glut in Australian inventories:



For example, in October 2015, there were just 17 days of diesel

Import cover calendar year 2014					
	Stocks Kt table 6	Imports ML/month table 4	Density tons/ML	Imports Kt/month table 4	Import cover days
Gasoline	705	338	737	249	86
Diesel	814	1,170	885	1,035	24
Jet fuel	320	308	810	250	39

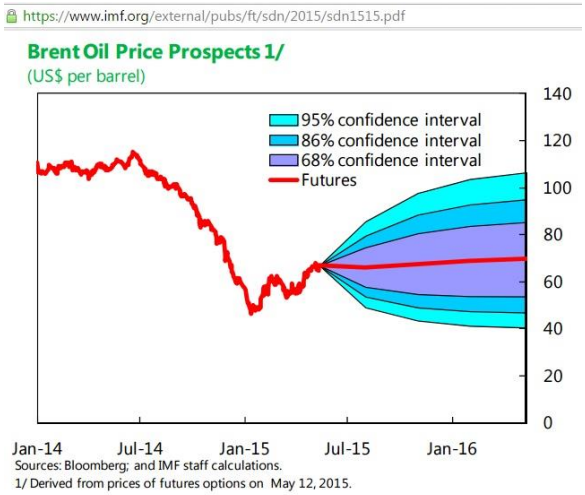
Import cover Oct 2015 last 12 months					
	Stocks Kt table 6	Imports ML/month table 4	Density tons/ML	Imports Kt/month table 4	Import cover days
Gasoline	771	547	737	403	58
Diesel	897	1,371	885	1,214	22
Jet fuel	356	409	810	331	33

The author of this submission was invited to a Senate Hearing on "Transport Energy Resilience" in Melbourne's Parliament House. More details are here:

12/1/2016 No glut in Australian petroleum inventories
http://crudeoilpeak.info/no-glut-in-australian-petroleum-inventories

Scenarios

No one can predict oil prices.



https://www.imf.org/external/pubs/ft/sdn/2015/sdn1515.pdf

The above graph is from the IMF paper "Global implications of lower oil prices" (July 2015). Oil price projections ranged from $40 to $105 for mid 2016, almost useless for practical

purposes. Imagine an airline basing their planning on this range. Or a toll-way operator, for that matter. So we can only look at scenarios.

(a) Oil prices stay low, that is below break-even production costs of the majority of oil producers. The reasons for low oil prices would be a recession due to the next phase of the financial crisis or a worsening economy in China (where those ghost towns indicate that China is experiencing its own subprime mortgage crisis). In that case high cost producers will have no other choice than to shut down production, especially when prices are below operating costs. This would mean that the oil industry dismantles itself similar to what we saw happening to Australian refineries. In some countries with nationalised oil companies there may be problems of paying for oil workers, social programs and subsidies, leading to social unrest and further production cuts. This may result in oil price spikes and continuing damage to the economy
(b) Oil prices go up again to $100 or thereabout when demand exceeds supply which had dropped due to lack of previous investments. As oil projects take several years to complete this situation cannot be easily resolved except by another recession and lower demand. In relation to US shale oil, there is a big question whether there will be enough confidence among investors and banks – who have burned their fingers – to finance another phase of shale oil. Quantitative easing – QE4 - will be required.
(c) Oil prices go back up to, say US$ 60 or US$ 70 and stay there for some time although there is no evidence during the last 10 years that this price level will be stable. Since the world increased demand to use US shale oil and the sweat spots are limited it is likely that in this scenario quantitative easing is also needed which will ultimately lead to another phase of the debt crisis. Everything will depend on oil from Iraq and Iran since all other producers, including Russia and Saud Arabia, are pretty much maxed out.
(d) Due to low oil prices Iranian revolutionary guards – involved in the oil business themselves - take some belligerent action which goes wrong and leads to a wider military confrontation involving the blocking of the Straits of Hormuz. All bets are off.
(e) Even blind Freddy knows the Middle East is a powder cake so there are many scenarios. The most serious will be social unrest among the Shia in Qatif (see my submission on the M4East) with most of the pipelines going to oil terminals and refineries.
(f) A major oil producer like Venezuela defaults (i.e cannot pay import bills for vital oil equipment) and production drops steeply. After exhausting inventories and releasing strategic reserves oil prices skyrocket.

There is actually no benign scenario for growing oil demand in the next decades because expensive US shale oil has peaked, the rest of the world is in year 11 of peaking with only limited prospects for additional oil from Iraq and Iran, both instable candidates.

In all oil crises scenarios Australia will be in danger as crude and product stocks are minimal.

Global warming

www.columbia.edu/~jeh1/mailings/2016/20160120_Temperature2015.pdf

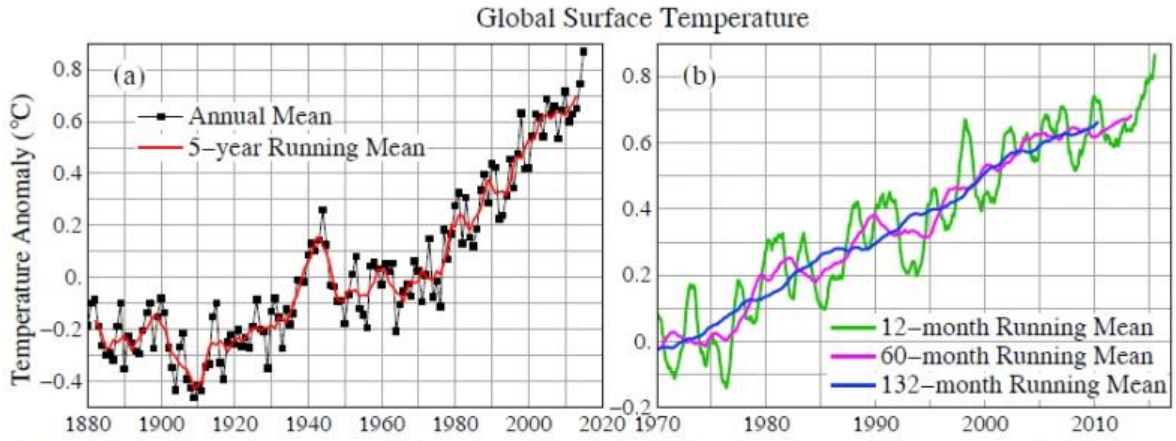


Fig. 1. Global surface temperatures relative to 1951-1980 in the GISTEMP analysis, which employs GHCN.v3 for meteorological stations, NOAA ERSST.v4 for sea surface temperature, and Antarctic research station data[1].

Global Temperature in 2015

16/1/2016

Abstract. Global surface temperature in 2015 was +0.87°C (~1.6°F) warmer than the 1951-1980 base period in the GISTEMP analysis, making 2015 the warmest year in the period of instrumental data. The 2015 temperature was boosted by a strong El Niño, nearly of the same strength as the 1998 “El Niño of the century”. The updated global temperature record makes it clear that there was no global warming “hiatus”. Global temperature in 2015 was +1.13 (~2.03°F) relative to the 1880-1920 mean. Accounting for interannual variability, it is fair to say that global warming has now reached ~1°C, almost ~2°F.

http://www.columbia.edu/~jeh1/mailings/2016/20160120_Temperature2015.pdf

Rebuilding transient coast lines

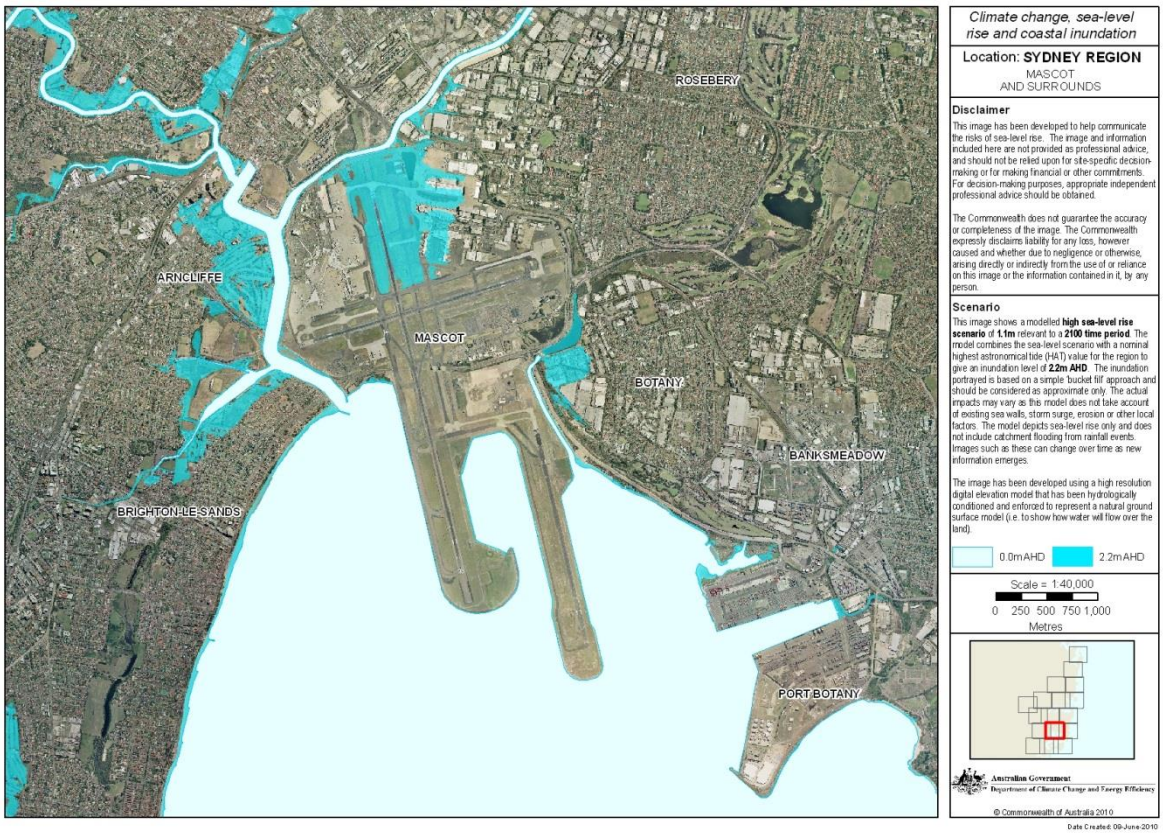
Icy flooding in New Jersey in Jan 2016 so shortly after Sandy

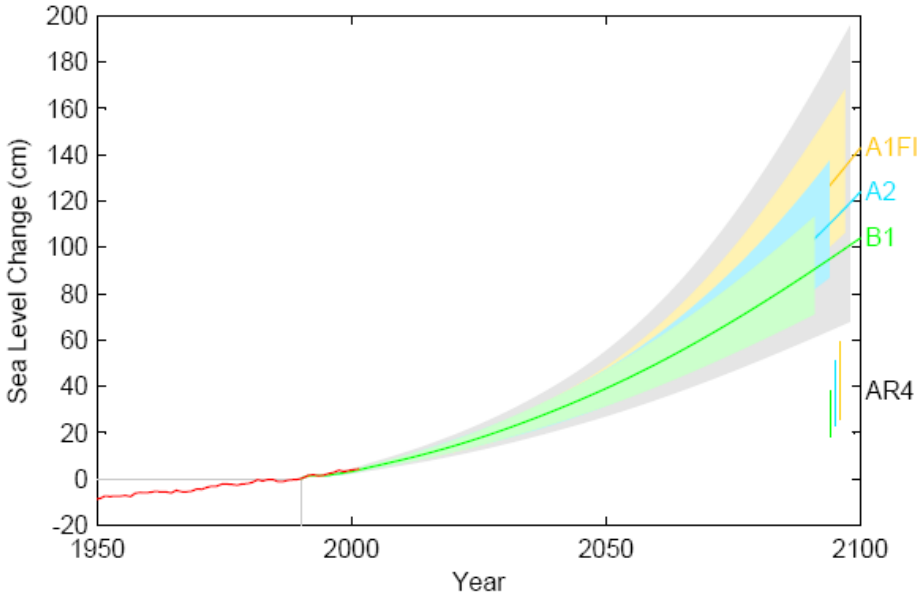
Predicted by James Hansen 10 years ago:

2006

"The effects of a rising sea level would not occur gradually, but rather they would be felt mainly at the time of storms. Thus for practical purposes sea level rise being spread over one or
two centuries would be difficult to deal with. It would imply the likelihood of a need to continually rebuild above a transient coastline.
http://www.columbia.edu/~jeh1/2006/CaseForCalifornia_20060630.pdf

Parts of the area served by the M5 will also be flooded by 2100



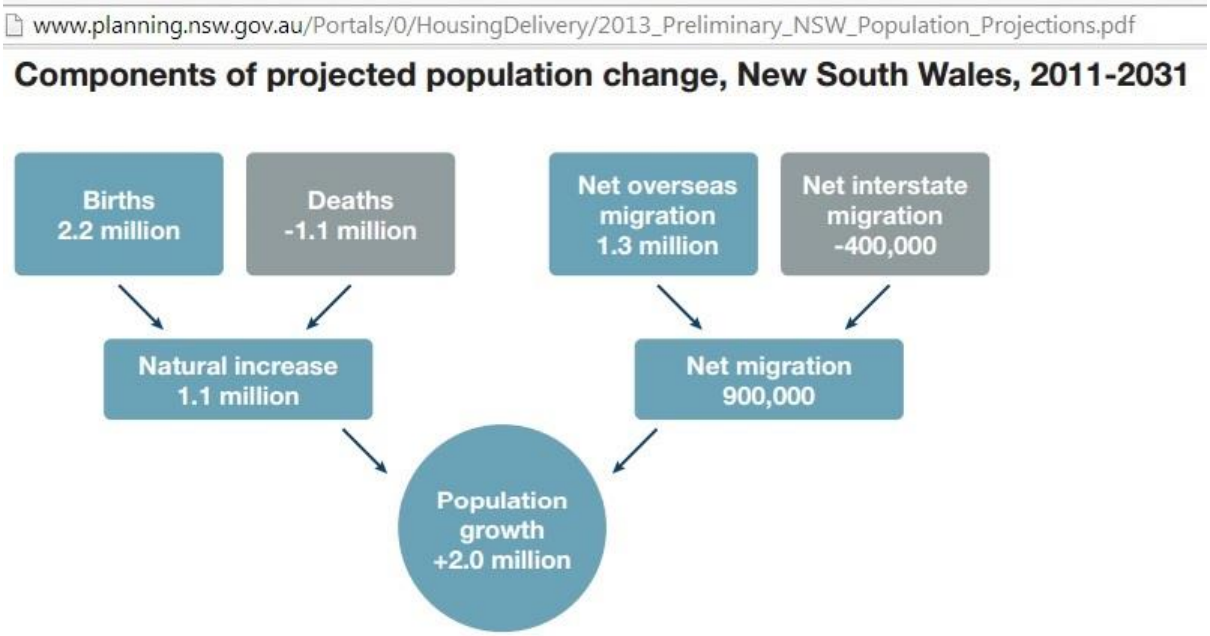


Sea level rise projection by the Potsdam Institute of Climate Impact Research

It is up to 2 m, not 0.88 m as assumed in App W, table W-5. It is am engineering principle to take the worst case scenarios from the literature, not to cherry pick research which is convenient for a project.

Implications for New M5

Already the assumption that there is sufficient energy for Sydney to grow from a population of 4.3 million to 5.8 million has not been tested. 65% of this growth comes from an entirely avoidable, unsustainable immigration where Asian immigrants immediately adopt wasteful Australian lifestyles. Moreover, it has not been proven that there will be sufficient affordable housing for that assumed population growth.



Likewise, the assumption that total vehicle movements will increase by 31% from 16 to 21 million vehicles per day by 2031 for the whole Sydney area has not been based on any energy calculation, whether from fossil fuels or renewable sources. If these assumptions for the whole of Sydney are wrong, then all traffic estimates for the M5 are also wrong.

In particular, the model in chapter 4.1 (App G "Future Year Traffic volumes and patterns") is completely flawed. It does not seem to contain any economic, financial, budgetary, environmental or energy supply parameters, let alone limitations or boundary conditions. Some of them may be hidden deep inside some of the sub-models. For example, GDP assumptions have not been made transparent in this chapter.

Therefore, chapter 9 (App. G) has made no assessment of implied oil or other energy supplies necessary to support the assumed traffic volumes on the M5**. Insofar the whole M5 documentation is absolutely academic**. Energy is economy.

Although I complained in my M4East submission that there were no screenline data for the existing (2012) traffic again this is not provided for the M5. It should be in the format of table 79 and 80, extracts of which are in this combined table:

New M5 EIS_Vol 2B_App G_Traffic and Transport.pdf - Adobe Reader

Table 79 WRTM screenline comparison between 2021 'without project' and 'with project' AWT volumes

Direction	Location	2021 'without project'	Share	2021 'with project'	Share	Change
Two-way	Princes Highway	72,415	21%	68,388	20%	-6%
	New M5	–	–	29,339	9%	–
	Marsh Street	75,979	22%	66,723	19%	-12%
	M5 East Motorway	101,554	29%	80,775	23%	-20%
	General Holmes Drive	95,018	28%	99,706	29%	5%
	Total	**344,966**		**344,931**		**0%**

Table 80 WRTM screenline comparison between 2031 'without project' and 'with project' AWT volumes

Direction	Location	2031 'without project'	Share	2031 'with project'	Share	Change
Two-way	Princes Highway	79,085	20%	75,628	19%	-5%
	New M5	–	–	34,748	9%	–
	Marsh Street	92,805	24%	86,501	22%	-7%
	M5 East Motorway	109,634	28%	95,208	24%	-13%
	General Holmes Drive	104,804	27%	108,233	27%	3%
	Total	**386,328**		**400,318**		**4%**

So we have no readily available 2012 number to compare to the traffic in 2021 (344,966) and 2031 (400,318). It would be important to know the assumed annual growth for the whole period to 2031. The increase from 2021 to 2031 is 16.3 % over 10 years. Applying that growth rate for the period 2016-2031 would be 24.5% over 15 years. It is absolutely impossible that oil production grows by that amount in that timeframe. So where is the modelling for:

(a) the truck fleet: fuel savings or alternative energy supplies including cost and timing of associated infrastructure
(b) the car fleet: fuel savings or alternative technologies like EVs including cost and timing of associated infrastructure

Note that Australia exports natural gas – potentially the only alternative transport fuel – in quantities equivalent to the total liquid consumption, a huge waste of energy. Details are here:

7/4/2015 Australia's alternative transport fuel: The East Coast gas-ship has sailed
http://crudeoilpeak.info/australias-alternative-transport-fuel-the-east-coast-gas-ship-has-sailed

CO2 emissions

New M5 EIS_Vol 2H_App U_Greenhouse gas.pdf - Adobe Reader

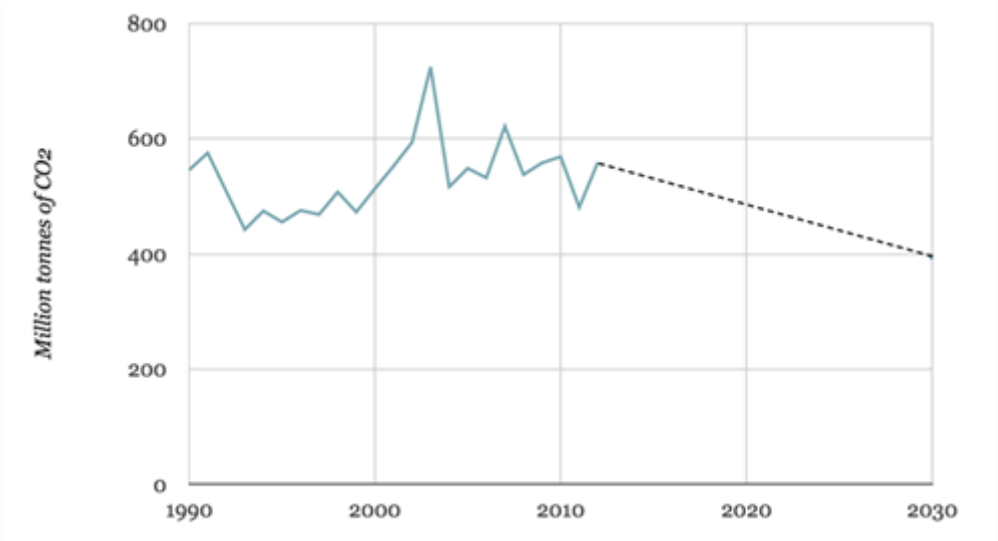
Table U-17 Scope 3 GHG emissions results for operational road use

Route	GHG emissions (t CO_2-e)					Difference between scenarios (t CO_2-e)		
	'Do minimum' (without project)		'Do something' (with project)		'Cumulative'	'Do something' – 'Do minimum'		'Cumulative' – 'Do minimum'
	2021	2031	2021	2031	2031	2021	2031	2031
Existing road network (within the study area)	5,924,115	7,885,465	5,938,768	7,532,411	5,812,520	14,653	-353,054	-2,072,945
The New M5	NA	NA	94,946	123,867	198,909	94,946	123,867	198,909
Totals	**5,924,115**	**7,885,465**	**6,033,714**	**7,656,278**	**6,011,429**	**109,599**	**-229,187**	**-1,874,036**

Note: negative values indicate a savings in GHG emissions for the 'do something' (with project) and 'cumulative' scenarios compared with the 'do minimum' (without project) scenario. NA = not applicable (the 'do minimum' scenario does not include the project).

Again, the existing (2012) emissions are not shown in the above table (is this done on purpose?)

Australia's modest CO2 reduction target is shown in the following graph, from 480 mt in 2021 to 400 mt in 2031, or 17%.



http://www.carbonbrief.org/australia-disappoints-with-weak-un-climate-pledge

So 5.92 mt should be reduced to 4.94 mt. The project 2013 number is 7.66/4.94 => 55% higher. The New M5 does not meet this target. Only public transport will do this.

Recommendation: The New M5 project should be stopped, immediately. Already the planning is a waste.

Prepared by Matt Mushalik 29/1/2016 mushalik@tpg.com.au @crudeoilpeak

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[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: Nell Graham
[redacted]

Address:
[redacted]

Lakemba, NSW
2195

Content:
I have uploaded my submission

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Nell Graham
[redacted]
Lakemba NSW 2195

29 January 2016

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

Dear Sir/Madam,

Re: WestConnex New M5 EIS, project number SSI 14_6788

I **object** to the **WestConnex New M5** for the following reasons:

DESTRUCTION OF BIODIVERSITY
I object to removal of most of the Critically Endangered Cooks River Ironbark forest at Kingsgrove, to the destruction of the habitat of the Vulnerable Green and Golden Bell Frog population at Arncliffe, and to the removal of the trees that provide food for the Vulnerable Grey-headed Flying-fox, which has a camp of substantial size in the Wolli Creek Valley and fly out every evening across Beverly Grove. The construction of a massive new road must not come at the expense of our bushland; our flora and our fauna.

DEGRADATION OF RECREATIONAL GREEN SPACES
I object to the loss of green recreational spaces at Kingsgrove, Bexley North, Kogarah Golf Course at Arncliffe, and at St Peters. As the density of Sydney increases and the associated urban heat island effect intensifies, our green spaces must be increased and enhanced, not decreased and degraded.

TRAFFIC IMPACTS ON LOCAL ROADS
I object to the increased traffic the NewM5 will bring to local roads. When complete, King Georges, Stoney Creek, Canterbury, Forest and Moorefields Rds. will carry increased traffic as motorists avoid the new tolls. These roads, already carrying numerous diesel-fuelled dangerous goods vehicles, will not cope with additional traffic, posing dangers for all using such local roads, in particular school children.

TRAFFIC MODELLING
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 that independent traffic planners can test its results.

URBAN DESIGN
I object to the building of new roads without considering the effects these roads will have on our urban environment. Where will all the new vehicles be parked when they get from the suburbs to the centres? By 2031, the New M5 is predicted to accommodate 81,500 vehicles per day, which will require lots of new carparks to be built on land in our city centres.

AIR QUALITY
I object to the three new unfiltered, emissions stacks proposed for Kingsgrove, Arncliffe and St Peters. These will negatively affect air quality in all surrounding suburbs. This is compounded for the densely populated suburbs of Wolli Creek and Arncliffe, which are already affected by the unfiltered M5 stack at Turrella; they will now also be affected by the new stack on the Kogarah Golf Course at Arncliffe. 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.

POOR ANALYSIS OF ALTERNATIVES
I object to the bias of the project objectives towards road infrastructure, and the exclusion of other potential solutions such as demand management or public transport infrastructure. The EIS confirms that the project will have significant societal, environmental and economic impacts and these could be avoided by pursuing other approaches. Sydney's population is forecast to increase but increasing private vehicle usage is not a sustainable solution to support this population growth.

Yours sincerely,
Nell Graham

NOTE: I have not donated more than $1,000 to a political party in the current financial year. I confirm that my name and suburb but not my full address nor email address can be published on the Major Project website where all submissions will published.

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: Sharon Laura
[redacted]

Address:
[redacted]

Haberfield, NSW
2045

Content:
I write in reference to WestConnex New M5 Environmental Impact Statement (SSI 14_6788)

I object to this proposal because the New M5 will have devastating impacts on our local communities and local amenities.

I object that the proposed Westconnex New M5 will destroy 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).

I know this area well and I love the Cooks River and surrounds. I find it outrageous, that in this day and age, when we should be building liveable cities, that the NSW Government can even contemplate putting a motorway through this area. We should be conserving and planting more vegetation - not uprooting it!

Only approximately 1,000 hectares of this highly geographically restricted forest and community remains from an original extent of close to 12,500 hectares.
So the impact of WestConnex on these 1,000 hectares represents a significant loss. Particularly 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. WestConnex, as proposed threatens critically endangered ecosystem, and approval for this project should not be given and the project should not proceed.

I object to the pretext that it is possible to offset the destruction of the Cooks River/Castlereagh Ironbark Forest of the Sydney Basin Bioregion by reserving other sites. This is just a cynical response and justification put forward by the proponent and is an insult, irresponsible and inappropriate.

I object that the New M5 will also be a massive contributor to greenhouse gas emissions, while destroying important habitat and greenspace.

I object that building more motorways will induce more vehicles onto the roads, create and concentrate more toxic traffic pollution, which will in turn cause significant and widespread adverse health impacts amongst the population.

I object to the project because there is no safe level of exposure to ultrafine particulate matter, which causes serious long and short term health problems, particularly for children, the elderly, immune comprised individuals, those with existing respiratory problems and also pregnant women. This project will cause there to be more ultrafine particulate matter in the atmosphere and at specific locations such as St Peter's public school.

I object to the project because independent traffic modeling demonstrates that the figures put forward by the proponent don't add up. So what confidence should any of us have in their predictions about anything?.

I object because WestConnex new M5 comes with no real evaluation of alternative options such as world class public transport. What a lost opportunity for us all.

Sharon Laura

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[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: Arwen Sutton
[redacted]

Address:
[redacted]

Erskineville, NSW
2043

Content:
Attn: Secretary, re: WestConnex New M5 EIS, project number SSI 14_6788
Submission to WestConnex New M5 EIS, project number SSI 14_6788

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).

Global experience and research has shown conclusively that these kinds of toll road mega-projects are hugely expensive and provide only short-term relief from traffic congestion. I have yet to hear of an independent transport expert who backs the project. WestConnex will increase air pollution and traffic, and expose NSW taxpayers to unacceptably high levels of financial risk. Even the EISs produced for the various stages of WestConnex show it is not a long-term solution to Sydney's congestion problem.

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.

Fundamentally flawed projects like WestConnex do not account for changing work practices supported by technologies such as teleworking, or flexible office spaces, or that car journeys are dropping as workers elect to work closer to home or use public transport, bicycles or car sharing. It also does not account for trends that will substantially change how people choose to travel in future and reduce the number of cars on the road, such as peak car or driverless cars.

WestConnex comes at not only a huge cost that is blowing out at the rate of over $2 billion a year. It also comes with a massive opportunity cost. The $16.8 billion and rising that would be spent on WestConnex is money that would be taken away from hospitals, schools, regional roads, and the public transport improvements that are urgently needed - not just in western Sydney, but many parts of regional NSW. If this $16.8 billion was spent on public transport and effective road management, a project like

WestConnex would not be necessary.

I also strongly object to a number of specific aspects of this EIS, and I expect you to publish this submission and send me a written response to each of the objections I have outlined below.

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.

Traffic on the existing M5 East exceeded capacity "within months" of opening (New M5 Project Overview, November 2015), including recent road widening. This lack of capacity is, in part, the rationale for the construction of the New M5. Managing demand on the M5 East and providing high quality public transport alternatives for those who can change mode would be a more effective long term solution that simply a `predict and provide' approach, yet this alternative - along with many others - has not been assessed.

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.

Heritage buildings would be destroyed for this project, while others would be isolated in a flood of traffic. e.g. terraces next to construction compounds and motorway in Campbell Street.

Residents in south west Sydney will suffer a huge loss of amenity as a result of the existing M5 being stripped of its green space and vegetation, particularly when residents fought so hard to get these green spaces established and thriving. I also strongly object to their concrete noise walls being replaced with transparent barriers. These will be right next to hundreds of homes, who will now be forced to look at (as well as listen to and breathe the fumes of) lanes of motorway traffic just over their fences. It is utterly unacceptable to prioritise the views of passing motorists over the privacy and amenity of people who live in an area.

This EIS fails to model traffic beyond two intersections after this project. This deliberately obscures the threat to King Street and roads in Alexandria. I object to exposing King Street and Edgeware Rd to the threat of becoming clearways.

Traffic along Sydney Park Road, Mitchell Road and Erskineville road is already choked from about 3 PM as well as Mitchell being blocked in the morning. Local streets will doubtlessly also be used as a rat run to enter and escape the new freeway. The extra traffic may be travelling from west to east and vice versa one km/hr faster than currently, but all local journeys face significant added time, not to mention the blockages that will occur when the extra cars spill out from the new freeways onto already choked local streets.

Residents affected by compulsory acquisitions are being offered below-market prices for their homes and businesses, which has caused additional and completely unnecessary distress and trauma for the owners. I find it disturbing that the NSW Government was warned three years ago that the compulsory acquisition process was unfair to those whose properties were being forcibly taken, yet has both failed to make the changes recommended and actively suppressed the report that handed down these findings.

One of my son's classmates faces the prospect of losing her home, and the psychological impact this has on her and other children in her situation must also be considered.

I strongly object to 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; 24/7 construction noise, vibration, and heavy truck movements; exposure to asbestos, construction dust, and toxic materials; and more. Mitigation is recommended in this EIS, but no information is provided about who might receive this 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.

Billions of dollars of construction contracts have been let for this project before this EIS was lodged. This casts huge doubts on the legitimacy of the community consultation process, and places unreasonable pressure on the Dept of Planning and Environment to approve this project regardless of its flaws.

Many local educational facilities from my local area are also omitted from the EIS. My children's school, Erskineville Public, is not included. Neither is St. Mary's Catholic school across the road, nor the local SDN childcare. These children all use Sydney Park recreationally as well as for school events and are well within the immediate impact area and are closer than other schools which

are included. Slightly further afield but still well within the area bounded by the other schools that are listed are another SDN, Sunbeam Preschool, Australia street infants school, Darlington Primary and North Newtown primary as well as a couple more Catholic schools and I'm sure several more childcare facilities. These are just the ones I notice missing from the St Peter's Interchange area of Table 15.2, without doing any extra research on areas outside my immediate knowledge. All of these children use Sydney park. These children will all grow up with their favourite green space turned into an inaccessible construction zone.All will be affected by exposure to increased pollution. All will be affected by increased traffic entering and leaving the M5 via their local streets. An EIS that fails to consider half the local educational facilities in one small area is clearly not doing its job; any conclusions drawn from such a study are patently invalid and the entire thing needs to be reassessed.

This project deliberately exposes communities in certain areas to increased pollution. Such an approach values the health and safety of people in certain areas of Sydney over others, and is both unjust and unacceptable. In addition, despite there being no safe level of exposure to fine particulate matter, the proponents want to build this project knowing it will increase these pollutants around much of the project route.

Scientific experts agree there is no safe level of fine particle pollution. Rather than aiming to shift dangerous pollution from area to another, the government should be finding cleaner transport solutions that do not leave residents living beside polluted roads or unfiltered pollution stacks - no matter where they live.

The air quality study shows that dangerous fine particle pollution already exceeds acceptable levels in some areas in the project areas, and will worsen if this project is built. I also object to the way this and other information about air quality and pollution impacts has been provided in this EIS; it is far too dense and opaque for ordinary residents to understand. It should go without saying that where public health is concerned, information about negative impacts should be provided in a way that affected residents can understand.

The EIS demonstrates that air quality, even at existing levels, is close to the allowable limits, and will only get worse with a major interchange, road upgrades and ventilation stacks implemented at the St Peters Interchange and surrounds. If new air quality standards as proposed by the Council of Australian Governments (COAG) in 2012 are implemented, the New M5 would well exceed allowable air pollution levels.

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 in Brisbane). I find it completely unacceptable that AECOM has been paid $13 million of taxpayer money to complete this EIS despite this, and despite it being awarded other WestConnex contracts that depend on the project going ahead. This is an utterly unacceptable conflict of interest. The public cannot trust that this EIS properly and fully investigates the true economic, environmental and social impacts of this project, and indeed the poor quality of this document reflects this. I also object to AECOM doing the EIS when it has contracts in the rest of the project including Stage 2. This conflict of interest needs to be explained and addressed.

Even with these flaws, tolls on these roads are to be in effect for decades. Many Sydneysiders will not see these roads untolled in their lifetimes. Nor will western Sydney or rural and regional NSW see any investment in their communities to create employment opportunities that would circumvent the need to commute long distances by car to jobs in Sydney's CBD, eastern suburbs and inner city.

The New M5 would cause costly traffic chaos throughout the inner west and south-west Sydney. 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. This EIS also clearly demonstrates that the traffic on roads around the St Peters Interchange will deteriorate as a result of WestConnex, as well as already heavily congested roads in Bexley, Rockdale, Kingsgrove and Brighton-Le-Sands. I object to building a road that the proponent admits will produce such volumes of traffic that such roads will be beyond capacity. Where traffic is already bad, plans should be to reduce it, not make it worse.

Meanwhile, even this EIS projects that the existing M5 and New M5 combined will end up taking less traffic now than the Cross City Tunnel, which was a financial disaster. This is because even the proponents know that commuters will be unwilling to pay $6 each way to use either of these toll roads, which is in line with figures in WestConnex's Updated Strategic Business Case that show for almost all of potential users, the value of time saved is less than the cost of using WestConnex.

What is even more worrying is that the proponent now concedes that it cannot make its traffic model work without other, unfunded toll road projects. What happens if or when these projects do not proceed? This EIS does not say, so the public does not have a chance to form a view or comment.

The delivery of the New M5 and in particular the St Peters Interchange, will have a significant impact on residents and businesses. The increased traffic resulting from this project will impact on urban amenity and will limit the ability for public transport services to operate efficiently due to increased local road congestion.

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 analysis of alternatives provided by AECOM in this EIS provides no solid evidence for the conclusions drawn. A combination of demand management of traffic and new public transport projects, especially for western Sydney, should have been explored. This is just one of many potential alternatives that could have provided more effective, sustainable and cost-effective ways of easing congestion that AECOM has failed to analyse.

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.

In addition, 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.

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.

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 City's view is that 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.

Endangered flora and fauna would be destroyed for this project, including the Green and Golden Bell Frog colony at Arncliffe and the critically endangered Cooks River Castlereagh Ironbark Forest at Kingsgrove/Beverly Hills. Saving these species in particular was a condition of the previous M5 motorway; destroying them now makes a mockery of these legal protections. I also object to the unprofessional analysis of the threat posed by the New M5 to these species and to biodiversity in general, as this section of the EIS attempts to downplay the significance of the flora and fauna threatened by this project and the impact of this project on biodiversity overall.

I am also concerned that the EIS suggests that the breeding ponds of the Green and Golden Bell Frog have not been kept healthy in recent years, especially since the RMS was responsible for building these ponds as a condition of the old M5.

Many public parks would be temporarily or permanently destroyed for this project, including parts of Sydney Park and the M5 Linear Park, along with thousands of mature trees along the route. Even if these trees would be reinstated, it will take decades to achieve the level of canopy that exists.

The project's proponents have misled the public about its plan to take 14,000 square metres of Sydney Park. For months it said it would only take 8,000 square metres, leaving it until the EIS was lodged to inform the Council that it planned to forcibly acquire the rest. This will diminish the enjoyment of the park in many ways. Peaceful paths, exercise equipment, children's play areas and sporting grounds, and more will all be adjacent to a major highway. This is completely unacceptable.

The increase in road capacity on Euston Road from four lanes to between six and eight, and Campbell Road from two lanes to six will have noise impacts on people living in the area and using Sydney Park.

There is already flooding at St Peters during heavy rainfalls. Councils have already found that the flooding modelling is not acceptable for the M4 East and the same approach has been used for the New M5.

The planning processes surrounding this project and WestConnex as a whole have been utterly corrupted. For example, key parts of the business case remain hidden from public scrutiny, even though it is being funded by taxpayer money. Homes and businesses are being forcibly acquired, multi-million and/or billion-dollar contracts have been let, and construction works have occurred place before any planning approvals are granted for this project. The entire WestConnex, including this project, has been characterised by poor governance, and a complete lack of transparency and accountability. Community consultation has also taken place only after detailed plans have been drawn up, so the general public has little to no input on a project that will affect hundreds of thousands of people's lives for many years to come.

The proponents have failed to consult with local businesses across the route, many of which would be destroyed by the traffic and/or construction impacts of this project.

The proponent has failed to adequately assess and responsibly handle asbestos, including the huge amounts it has removed ahead of this EIS from the Alexandria Landfill and transported through inner Sydney out to the western suburbs. More toxic asbestos is expected to be dug up and transported from various sites along the New M5 for this project, and the numerous breaches of basic health and safety procedures observed by residents in St Peters, Granville and Erskine Park in this regard have not been properly assessed in this EIS.

I therefore ask that you reject this proposal, publish my name and submission in accordance with the undertaking on your website, and provide a written response to each of the objections I have raised.

This project is an absolutely untenable waste of taxpayers money. That bigger roads create more traffic has long been a given. There will be no winners from this project apart from the developers who pocket the money. Even if you trust the dodgy traffic

modelling provided by the developers, motorists will face an expensive toll for a potentially slightly faster journey from A to B once the entire scheme reaches completion in ? years, but they too will be footing the bill for its construction, and many of those who are looking forward to a faster trip may well be retired by this time. In the meantime, communities will be torn apart by the construction process, families will be made homeless, and parks will be destroyed. Pollution will increase, all local traffic will be worse, and my children won't be able to ride their bikes to the park any more.

I have edited the text provided by the westconnex action group and expect a personalised response to each and every one of my concerns.

Yours,
Arwen Sutton

I am attaching some 30 further submissions which I managed to gather at school yesterday. Please respond to each of these individually.

[redacted]

Audit WestCONnex

NoWestConnex
Public Transport

To: Grant Hehir, Commonwealth Auditor-General

We urge you to conduct an audit of the WestConnex tollway. The project has made a travesty of the NSW planning process. Hundreds of people's homes are being compulsorily acquired, however the project is yet to gain the necessary planning or environmental approvals. There has also been no attempt to investigate public transport alternatives to WestConnex. At a cost of $16.8 billion (including $3.5 billion of federal grants and loans), it is one of Australia's costliest infrastructure projects ever, yet it has failed fundamental tests of accountability and transparency.

Name (first name, surname)	Email (required)	Postcode (req.)	Mobile	Want to help out?
Emma Jones	emmaj@internode.on.net	2043	0437235006	Y / N
Lisa Smith	lisa_hunter_smith@hotmail.com	2043		Y / N
Karen Rose	Karenrox34@optusnet.com.au	2043		Y / N
Grainne King	grainneire@gmail.com	2015	0452448585	Y / N
Helen Field	helen_field@polox.com	2043	0413 276 915	Y / N
REBECCA HARDMAN	rebecca.e.hardman@icloud.com	2044	0408 603 381	Y / N
SUSANNE RIEDL	susi.riedl@yahoo.co.uk	2015	0427 607 154	Y / N
Sam Jennings	sam@causewayfilms.com.au			Y / N
				Y / N
				Y / N
				Y / N
				Y / N
				Y / N
				Y / N
				Y / N
				Y / N
				Y / N

Thanks for signing our petition! We'll keep you updated about the progress of the campaign.

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Name (first name, surname)	Email (required)	Postcode (req.)	Mobile	Want to help out?
CHARLES HEBERT	acutemassage1@gmail.com	2043	0401 414 075	Y/N
Melinda Mestre	melinda@mandassociates.com.au	2043		Y/N
Kristen Bourke	kristy.bourke@gmail.com			Y/N
Peter McAllister	petemcallister@gmail.com	2043	0419 717 944	Y/N
Marlise Kalt	marlisekalt@gmail.com	2043	0408 416 896	Y/N
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Stefania Baniolo	stefaniolo@gmail.com			Y/N
Agnieszka Bachfischer	thebachfischers@gmail.com	2043	0401 453 196	Y/N
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JULIE FOX	juliefox@ozemail.com.au	2043	0411 651 497	Y/N
Robyn Soper	bubsjie@yahoo.com	2043	0408 248 217	Y/N
MATT HOLMES	holmes202@mac.com	2042	0414 413 043	Y/N
Jasmine Stanton	jasmine.justin@bigpond.com	2050	0403 011 325	Y/N
NORIKO O'LEARY	n.oleary59@gmail.com	2043	0488 208 089	Y/N

Thanks for signing our petition! We'll keep you updated about the progress of the campaign.

[redacted]

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[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Content:
No Transparency - a deliberate action to hide the real facts from the general public.
Aside from the poor consultation process, the government has actively sought to avoid scrutiny, by transferring responsibility for this project from a government body, the WestCONnex Delivery Authority, to a privately-run government company called the Sydney Motorway Corporation. So now, westCONnex is now being built by a private company that does not even have to publish its contracts. This is unaccountable government at its worst.

This is yet another shameful act to hide information about the project and the actions of the Sydney Motorway Corporation and government from proper and rightful public scrutiny. It is a disgraceful political tactic.

The fact that the NSW Government has already signed multi-billion dollar contracts for WestCONnex before this EIS was even placed on public exhibition undermines community confidence that this is a genuine consultation process.

Accountability for contracts already let to companies is hidden behind the convenient phrase "commercial in confidence". ALL contracts entered into by government in the name of its citizens must be gazetted and terms and conditions disclosed so that the public understand what agreements have been entered into in their name. Government MUST NOT be allowed to hide behind the façade of a bogus "public company" to deliver projects.
Just many more reasons to strongly object to the westconnex

[redacted]

[redacted]

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[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: Isabel McIntosh
[redacted]

Address:
[redacted]

Alexandria, NSW
2015

Content:
Please see submission in attached PDF below.

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Date: 26 January 2016

Re: **SSI 14_6788 EIS - Submission to Westconnex, New M5 Extension and St Peters Interchange and Euston Road widening.**

To: NSW Department of Planning and Environment, GPO Box 39, Sydney

CC: Premier Mike Baird

From: Isabel McIntosh, Alexandria Resident, Two streets from Euston Road.

Dear Minister Stokes and Minister Gay, Premier Baird and those who have responsibility for leadership in NSW.

I am writing regarding the WestConnex M5 expansion EIS, specifically its bisecting of the inner west and St Peters. I **strongly object to this expansion** that will bisect the suburbs of the inner west within metres of people's home and green space and does not engage with alternative solutions to achieve the government objectives or engage with best practice of sustainable and liveable and 21st century cities.

This Australia Day I should have been at the beach with my kids, enjoying a last holiday before school goes back. Instead I drafted a submission on WestConnex. The EIS tells me that the St Peters Interchange will dump 100,000 cars a day onto local roads. Beautiful Sydney Park will lose 14,000sq metres of land and 350 trees when one local road is widened for 60,000 of those extra cars. But where will these cars then go when they leave the six lanes for the single lane? Every time I look at the EIS I only have more questions.

I want to know where I can find an integrated assessment that looks at the cumulative impact of WestConnex. At the moment each bit of the environmental, social, cultural and economic damage is looked at in isolation. If a piece of fabric had so many rips it would be considered ruined.

My significant questions 1

Cumulative Impact 3

Why is the financial cost so high? 3

Lack of Community Consultation 3

I have looked at the plans and the list of impacts that this new motorway will have as it cuts across the inner west from current M5 east exit to reach Haberfield.

My significant questions

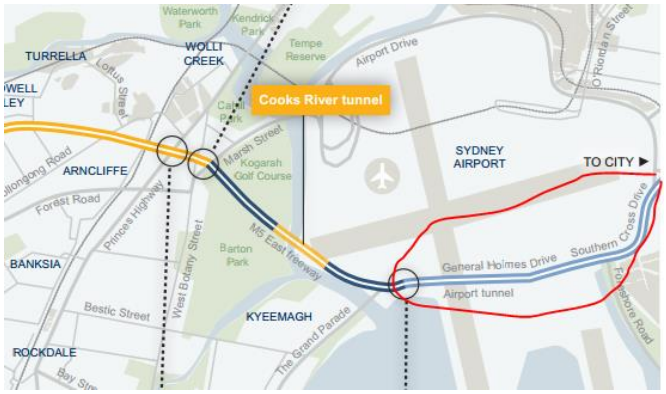
After assessing the impacts (which will be listed in many other submissions such as environment, health and social impact) my biggest questions are:

1. **Why is this road BISECTING these inner west suburbs and adding St Peters Interchange when another orbital option from current m5 east via Eastern Distributor far less impact?**

- There is already an industrialised corridor between the M5 to Haberfield via General Holmes Drive, Southern Cross Drive, Eastern Distributor, X city tunnel and Anzac Bridge.
- CURRENTLY if a car is travelling from Parramatta to Airport this is the way they go.

- M4 → (New M4 tunnel) → Haberfield → Anzac Bridge → X City Tunnel → Eastern Distributor → SX Drive → Airport.
- IF someone going from Parramatta to Bexley they will not be using the proposed M5 tunnel they will cross through St Georges Rd.
- Surely a huge amount could be saved if General Holmes Drive to Southern Cross Drive road is improved including that road mess outside Domestic Airport.

MAP: CURRENT CONNECTION TO HABERFIELD FROM M5 EAST – NO BISECTING OF INNER WEST



2. How does it aid transport to Port Botany?
3. Why does the project ignore alternatives for freight transportation and support unsustainable road freight. Surely the money would be better spent fixing up the FREIGHT train line so it can operate during the day and a solution is found so that it avoids commuter train line.

I strongly object to the M5 extension that ends up at St Peters Interchange because:

- There is no logic to the road cutting through the inner west as a means to take Western Sydney traffic to airport or heavy trucks to the Port.
- There is no logic why $500m per km of new road formed for freight to port botany when there is a freight train line that just needs a fix so can be used in the day.
- The expense is enormous ($500m per km) for the listed benefit of travel time improvement of 1km per hour and the addition of thousands of new cars to suburban roads.
- The project will remove 14,000 hectares of Sydney Park and place this special green space in the inner city amongst a roads dystopia.
- The project lacks transparency and accountability and from a government perspective is without robust financial justification OR evaluation of alternatives to achieve the supposed objectives:
-
    - ORBITAL ROAD round Sydney... why bisect inner west and not improve General Holmes Drive to Eastern Distributor link?
    - ALTERNATIVE RAIL TRANSPORT TO PORT

- CITIZEN TRANSPORTATION – Where is evaluation of alternatives such as improvement to trains, train parking hubs, public transport, and cycle ways?

I searched the EIS but could not find:

- Any independent assessment of Greenhouse emission contribution - project claims, using an unsound methodology it will prevent $832 million of greenhouse gas pollution from being generated in spite of a forecast of 31% increase in traffic.
- Any reference to cumulative impact – the synergies of all the individual damage.
- Where is the noise modelling for residents living in two storey homes along its perimeter?
- Where is reference to justification for exceeding national guidelines of PM2.5 particles?
- Where is the cumulative impact assessment of loss of green space such as at Sydney Park?
- How can the EIS admit that there is a risk of health impacts, including on users of Sydney Park, but delay information about its mitigation until after planning approvals?
- Where is the independent assessment of the traffic modelling?
- Evidence of Benefits? Westconnex is meant to go to the Port, take heavy traffic there. But it doesn't? Does this mean that Westconnex fails to deliver its key objective?

MY OTHER CONCERNS of which 11 tomes of Environmental Impact Statement delivered the week before Xmas do nothing for:

Cumulative Impact

Where I can find an integrated assessment that looks at the **cumulative impact** of WestConnex? At the moment each bit of the environmental, social, cultural and economic damage is looked at in isolation. If a piece of fabric had so many rips it would be considered ruined.

Aside from the question of WHY this road has to bisect the inner west there is the long list of environmental and social impact it will have.

• Increase of traffic from 7000 to 61,000 on Euston Rd/ McEvoy Street which will turn into 6 lane road. When RMS asked what will happen to the cars at end of 6 lanes or what their destination is the response was that “they will disperse”. Do they mean like Water Vapour? **ACTION -** A holistic planning needed of where and why those cars are going to Alexandria? AND why a route that takes them via Southern X Drive is not possible?

Why is the financial cost so high?

The cost of Westconnex is $500m PER square kilometre (total project cost $16.8bn divided by 33km of new roads). Surely a huge amount could be saved if General Holmes Drive to Southern Cross Drive road is improved including that road mess outside Domestic Airport.

Lack of Community Consultation

As I wade through the documents and the public discussion and the hundreds of question I feel that the NSW government and the private enterprises that will benefit from these roads are treating regular citizens like me as peasants: using institutional power to squash our knowledge; silencing our ability to critique. Yet this will be the largest transfer of public money to private companies in the history of NSW. That public money comes from tax

payers paying their taxes… in all likelihood the opposite of assumed tax avoidance of the private companies who will benefit from the project.

Westconnex is not a “lie back and think of the economy” project. Professor Newman, a distinguished academic, was once on the board of Infrastructure Australia. He says the twenty-first century cities is about building cities not roads. He says, Westconnex has no strategic purpose for economic productivity or sustainability in a knowledge economy. Instead it’s public transport, cycling and walking that are most important.

Just as a couple of final notes:

Our family of 5 uses public transport or cycling for most journeys including to and from work and so are never by traffic snarls. As the kids get older cycling is becoming more hazardous due to them not being allowed to ride on footpaths and the cycle snarls queuing at traffic lights (case in point is cnr Bourke Road and Huntley Street where sometimes 30 bikes and pedestrians waiting to cross road – all merging onto a footpath as no cycleway) My objection is the lack of logic and explanation for the M5 extension and bisecting of the inner west and adding tens of thousands of cars onto the roads. Research shows that more roads bring more cars. Where are the public transport solutions? Where are the safe separated cycleways?

I urge a full Federal audit of WestConnex. This is the largest public transfer of money into private hands ever.

Yours sincerely
Isabel McIntosh
[redacted]

26 January 2016
From an Alexandria Resident
Re: Westconnex M5 expansion and St Peters Interchange

Dear Mr Baird

This Australia Day I should be at the beach with my kids, enjoying a last holiday before school goes back. Instead I will be at home writing a submission on WestConnex, your $16billion motorway dystopia.

Just before the holidays began you released the eleven volumes of the M5 Environmental Impact Statement (EIS), and set 29 January as the last day for submissions. If I and other citizens don't respond you will say we don't care about this project, even though councils, expert roads and sustainability professionals and hundreds of others have already expressed significant arguments against it. But how will my EIS submission, my lost Australia Day, contribute to your decision-making on the project?

The EIS tells me that the St Peters Interchange will dump 100,000 cars a day onto local roads. Beautiful Sydney Park will lose 14,000sq metres of land and 350 trees when one local road is widened for 60,000 of those extra cars. But where will these cars then go when they leave the six lanes for the single lane? Every time I look at the EIS I only have more questions.

I want to know where I can find an integrated assessment that looks at the cumulative impact of WestConnex. At the moment each bit of the environmental, social, cultural and economic damage is looked at in isolation. If a piece of fabric had so many rips it would be considered ruined.

Mr Baird, why couldn't you have listened to citizens first before proceeding? Notification is not consultation and your engagement is insulting. WestConnex is like replacing the Manly to Circular Quay ferry with a bridge based solely on the argument it will save six minutes of travel time.

Why didn't you formulate the concern as a public question? For example asked: Sydney has a productivity issue. People are spending too long in their cars getting to work. Sydney's roads don't connect. One option may have been suggested that NSW taxpayers spend $16bn on a 33km roads project. Other options could have been put onto the same ideas table for consideration from citizen and professionals. Options that asked what can be done to improve the liveability of our city and everyday lives. These are the questions other major cities of the world are asking.

What gets me is that you "had to" sell off the Australia Technology Park to create government revenue. But you've already let the budget for Westconnex blow out by $6bn. What sort of slippage is that? If a local council mismanaged funds so badly you'd have labelled it "not fit for anything" and demanded it amalgamate.

You treat us all like peasants, using your power to squash our knowledge. Westconnex is not a "lie back and think of the economy" project. Professor Newman, a distinguished academic, was once on the board of Infrastructure Australia. He says the twenty-first century cities is about building cities not roads. He says, Westconnex has no strategic purpose for economic productivity or sustainability in a knowledge economy. Instead it's public transport, cycling and walking that are most important.

Would you like to be a regular citizen staring at these eleven volumes of the M5 EIS on Australia Day? They weigh more than a month's worth of groceries but have zero nutrition value. I'm staring at

them now, despising the elite political world and the influence of corporate power on everyday citizens. I should be at the beach with my kids. Or at a BBQ in Sydney Park. Or on the Manly ferry.

When your Australia Day holiday is over I invite you to spend a day on a bicycle in the inner west. See the liveability and uniqueness of this special place that your Westconnex will destroy. There's a few schools too that could benefit if some of that $16,000,000,000 was diverted.

Isabel McIntosh
Tax-payer. Resident. Mother. Public Transport User. Cyclist. Citizen
Alexandria
[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: ANTHONY MCCOSKER
[redacted]

Address:
[redacted]

ERSKINEVILLE, NSW
2043

Content:
SEE ATTACHMENT

[redacted]

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

29th January 2016

Dear Sir,

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

I make this submission in response to the Westconnex M5 Environmental Impact Statement (EIS). I strongly object to the project and the whole WestConnex for all the reasons listed below.

- 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.
- 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.
- 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.
- 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.
- 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?
- 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?
- 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.
- 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.
- 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.

- 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.
- **The EIS relies for its justification of Westconnex M5 on endlessly building tollways, leaving much of Sydney with a grim future of car dependency**
- Alexandria, Enmore, Newtown and other suburbs will suffer deteriorating air quality due to traffic congestion exposing residents to lung cancer and children to impaired lung development
- The EIS ignores the social and pychological impact of devastating the suburb of St Peters
- Westconnex M4 and M5 will remove 40 hectares of vegetation which cools suburbs and reduce our carbon footprint
- Residents are being affected by compulsory acquisitions being offered below-market prices for their homes and businesses, and the EIS completely ignores the distress and trauma this has caused.
- The impact of hundreds of diesel trucks, dust and noise on communities including during years of construction. The cumulative impact of these should be added to the same problem with the M4 East.
- Westconnex M5 will pour traffic onto the Inner West local road network, adding to already costly and unhealthy traffic congestion.
- The inadequate analysis of the threat posed to the endangered Green and Golden Bell Frogs at Arncliffe, which even Westconnex admits may not survive the M5's construction and operation.
- **The EIS provides no hard evidence about why alternatives won't work; there should be modelling of impact of traffic management along with increased public transport**
- The EIS ignores publicly available scientific evidence of breeding events of Green and Golden Bell Frogs on Kogarah Golf Course in order justify risking one of two surviving colonies of these frogs in Sydney.
- No noise modelling has been done for how residents living above two stories will be affected
- **The cost of Westconnex is escalating at a rate of $2 billion a year**
- Billions of dollars of construction contracts have been let before this EIS was lodged.
- I object to the use of an air quality model that hasn't been used in Australia before and which cannot be verified by the NSW EPA. There will be an increase in dangerous pollution in some areas close to the tollway portals, including near schools. It's not acceptable for a government to deliberately place the health of citizens in jeopardy. I note that fine particle pollution can cause lung cancer and is particularly dangerous for the lungs of growing children.
- The EIS relies for its justification of its tollway on an Airport connection and Southern tollways for which there is no details or design available.
- Westconnex will unfairly load Western suburbs residents up with tolls without enhancing public transport possibilities.

- 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.
- Tunneling 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.
- **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.**
- **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.**
- 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. Travelers 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.
- Tunneling 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. 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.
- 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.
- 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.
- Thousands of diesel trucks will carry spoil at all times, including peak times, leading to great disruption of local and regional road networks.
- It is not clear whether massive proposed increases in population in the Inner Sydney have been taken into account in traffic congestion predictions
- The impact of thousands of extra diesel construction trucks a day has only been predicted for a narrow area. Many more residents will be affected
- Westconnex is now a private company that does not even have to publish its contracts; this could lead to issues of unaccountability
- According to the EIS there is a risk of unacceptable levels of fine particle pollution on the Southern end of Sydney Park. There is NO safe level of fine particle exposure; Westconnex is consciously building a project that it knows will worsen already high levels of pollution on St Peters, Enmore and Alexandria
- Westconnex admit that dangerous dust pollution will be created during construction at St Peters. It proposes to water the site to avoid this. The community cannot accept this when Westconnex's itself has failed to water the site during current asbestos removal.
- Westconnex admits that 71,000 diesel trucks a day using Euston Road in Alexandria will end up in a traffic jam on local roads.
- Construction traffic will continue throughout the night which will disturb the sleep of residents located along *local* road networks.

- The business case that was finally released by the government has so many redactions that it cannot be interpreted by independent analysts. A project costing $17 billion should be transparent
- Westconnex is refusing to release any plans it has for massive Inner West construction compounds that would be necessary for the M4/M5 if it ever was to be built
- I support a massive injection of funds into public transport for the Western suburbs rather than a legacy of unaffordable tolls. If $16.8 billion was spent on public transport and effective road management, Westconnex would not be necessary
- The Social and Economic impacts of the project are based on out of date 2011 baseline statistics. There have been massive actual (and future) developments and changes in the Inner West areas impacted by the St Peters Interchange that make these 2011 statistics all but meaningless.
- 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.
- Thousands of trees along the route in Beverly Grove Park, Sydney Park and other parks are being destroyed to make way for a tollway that even the EIS shows won't solve traffic congestion. The NSW government should be preserving green space and vegetation not destroying it.
- Valuable heritage buildings will be destroyed or left marooned and surrounded by tollway in St Peters.
- 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"*

- 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.
- Westconnex has not issued the assumptions and the modelling parameters on which they are basing these statements, so their accuracy cannot be tested by independent experts.
- 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.
- 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 car parking 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.
- Experts at the EIS exhibition sessions gave contradictory advice about traffic modelling. All traffic modelling should be transparent and independently tested, particularly because AECOM has a poor record in traffic modeling.
- The Social and Economic aspects of this EIS are totally negligent by exclusion of costs, health, traffic modeling, and social and economic impacts on communities and businesses outside the immediate vicinity of the project construction footprint. The St Peters Interchange will directly impact vast local areas including Tempe, St Peters, Alexandria, Erskineville, Newtown, Enmore, Stanmore ….yet the NSW Department of Planning and Environment does not require these massive impacts to be analysed and presented to the public when considering the EIS.
- There are no clear plans of where millions of cubic metres of spoil will be deposited in communities in Western Sydney that have been given no information or consulted.
- 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 pedestrian networks can move more commuters per lane than can be moved by car.
- Independent transport modelling experts have found scores of problems with the application of the Westconnex Road and Traffic Model which has not been released for scrutiny. It would be negligent for any government to go ahead with a project based on uncertain predictions.
- 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.
- 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.

- Residents are being forced out of homes at below market prices before approval has been given for the project.
- 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.
- 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.
- This project will carve 11,000 square metres from Sydney Park and expose the rest of the park to vehicle fumes and noise. This damage is particularly felt, because this area already has one the lowest amounts of public open space per person in Australia, even without considering the future in-fill projects that are already in progress. **I highly value Sydney Park and fear that accessibility to it will be reduced and its value in terms of amenity and use for locals and visitors alike will be drastically reduced.**
- 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.
- 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 after the project.
- I object to the removal of community parks along the M5 East that the community has built up over decades after their community was carved up that motorway, only to see them threatened by a new tollway.
- I am aware that independent traffic experts have not access to full information about the assumptions on which traffic modelling. Westconnex must be instructed to fully respond to independent experts who have been commissioned by Councils or are academic researchers and to make their models available. AECOM and RMS openly admit that they have collaborated on the modelling. Their claims must be fully and independently scrutinised. When the living conditions of thousands of residents is at stake, it is not acceptable for a government department or private company to claim 'ownership' of a model.
- Scientific experts agree that there is no safe level of fine particle pollution. Rather than aiming to shift dangerous pollution from area to another, the government should be finding cleaner transport solutions that do not leave residents living beside polluted roads.
- Plans to expand roads to within 5 metres of residents' homes is outrageous. I am aware that in cases in St Peters and Alexandria it is within 2 metres.
- The noise assessment shows that hundreds of homes will experience noise above acceptable levels. In fact the results reveals in Appendix J could be far worse because 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.

- The noise monitoring is inadequate for St Peter because there is no attempt to consider the cumulative impacts including on health for aircraft and tollway construction and later operation.
- Independent experts have reported that some of the tables are inaccurate in the noise report and are therefore not reliable.
- I am particularly concerned about the community on Stoney Creek Road. The RMS and AECOM have not consulted properly with this community or informed residents that Westconnex has a plan that will make congestion and air quality in their neighbourhood worse
- Noise monitoring has been too limited to properly assess the massive noise that will be generated by construction and operation on thousands of Sydney residents.
- A failure to consider negative impacts of the whole project (for example, total loss of vegetation) while relying on unproven, unplanned positive benefits for the whole project.
- Westconnex's failure to assess correctly and handle responsibly asbestos that is already impacting on communities in St Peters, Granville and Erskine Park. Given its failure to identify much asbestos along the M4 during an EIS, its contamination analysis for the New M5 must not be accepted at face value.
- A failure to consult genuinely with the community.
- Increased greenhouse emissions that would be caused by the project; The EIS fails to analyse alternatives apart from 'doing nothing' that would have far less impact on emissions.
- Destruction of hectares of green space across the entire Westconnex project, including critically endangered Cooks River Ironbark forest at Kingsgrove and parts of Sydney Park.
- The wholesale destruction of valued heritage buildings in St Peters and elsewhere.
- Assurances from politicians and bureaucrats that they won't create clearways in the future are worthless. The EIS acknowledges that a full review of local traffic conditions will be conducted after construction of the M5 New is completed, and action taken to rectify any local road traffic problems. This is disguised code for imposition of the inevitable clearways on King Street and Edgeware Roads, and in the Alexandria and Erskineville areas.
- A failure to do traffic modelling outside the immediate project footprint leaving the community to deal with environmental and financial costs of congestion in the future. It is unrealistic to suggest that the impacts will stop at the construction end points of the project.
- **The EIS claims unproven, unplanned positive benefits for the whole Westconnex while dealing with negative impacts only for each project stage. I object to the fact that at no point will the cumulative impacts of the entire Westconnex project be assessed, yet the cumulative purported benefits are constantly referred to as part of the EIS report and justification for the project.**
- 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.
- The EIS claims that traffic congestion caused by the New M5 would be improved by Westconnex Stage 3 but no plans have been released for any aspects of the M4/M5

connection, leaving communities in the dark wondering what shocks can be expected further down the track.

- **The EIS ignores the work of independent traffic and planning experts who have presented evidence based arguments that Westconnex won't meet its time-saving or congestion goals. One such example is the SGC Economics report produced last year. Reference to such a report could help to calibrate potential traffic modelling errors for WestConnex and would also address community concerns that exist surrounding the project.**
- **I object to the fact that local resident groups and community sentiment has been ignored in the EIS document.** 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 has largely been negative and 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.**
- **I object to the EIS as the Secretary's Environmental Assessment Requirements 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. 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.

I ask that you reject this proposal, publish my name and submission in accordance with the undertaking on your website, and provide a written response to each of the objections I have raised.

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

29th January 2016

Name __ANTHONY MCCOSKER_____

Street [redacted]

Suburb _____ERSKINEVILLE_____Postcode___2043_____

Email ____[redacted]_____

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Content:
I strongly object to the building of new roads such as WestConnex without considering the effects these roads and the extra vehicles will have on where I live.
For instance, where will all the extra vehicles be parked?
What about the increased exhaust pollutants from the unfiltered emissions stacks at Kingsgrove, Arncliffe and St Peters? All surrounding suburbs will be negatively affected by pollution especially concerning for local children.
I urge you to care more for the health and welfare of families living in the inner west and consider cleaner alternatives.

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Content:
NO CASE PROVEN FOR THE WESTCONNEX - SO MUCH EVIDENCE AGAINST ITS WORTH
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.
many more reasons to object to the westconnex

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[redacted]

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[redacted]

Name: Andrew Hill
[redacted]

Address:
[redacted]

Alexandria, NSW
2015

Content:
I don't see the need for road improvements for cars to get into the city, when the city cannot take more cars (or even those it has). We should be adding and improving large-scale public transport so that the existing roads are freed up for those who need to drive.

Public transport and cycling are both drastically more space-efficient (commuters per square metre of infrastructure) than cars, and Sydney is severely space-limited, so high-density transport is the way to go.

As cycling becomes increasing popular, cycling infrastructure should be prioritised for safety of all, and to help reduce the need for cars on roads by encouraging cyclists. The plans should include major cycling routes into and out of the city, such as
* along or close to Parramatta Rd or the train line (there is no obvious/sensible/continuous route from areas like Concord/Strahtfield/Burwood/Five Dock/Leichhardt, despite excellent infrastructure a little further west, and some excellent islands of infrastructure in these areas)
* more complete connectivity between the city and parramatta river cycleway (currently many disconnections through Gladesville/Drummoyne//etc)
* a connection to the M5 cycleway (which currently ends at Kingsgrove, but could easily connect to the city along Wolli Creek)
* to the north, a connection between the Epping Rd / M2 cycleways (currently ending at Narremburn) and the harbour bridge
* a proper bicycle path at the north end of the harbour bridge (its currently a long stairway for cyclists)
* a continuous cycleway connection between the excellent Iron Cove cycleways and the similarly excellent M2/Epping Rd cycleways in Lane Cove (currently some sporadic islands of cycleways along Burns Bay Rd, and some very dangerous infrastructure)
* some kind of cycleway through Marrickville (e.g. the Greenway, though an East-West would be useful too)

These are the major "road blocks" for a huge number of cyclists being able to commute without riding on Sydney's bicycle-unfriendly roads, and getting people on bikes instead of in cars would significantly reduce the need for any additional road capacity.

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[redacted]

Name: Ben Aveling
[redacted]

Address:
[redacted]

Alexandria, NSW
2015

Content:
I strongly object to the New M5.

It is a project with no winners.

The costs will exceed the benefits for those that use the M4/M5, and for those that don't.

The EIS predicts that the project will reduce, not increase, the number of users of toll roads, precisely because the costs to commuters exceed the benefits.

Even those that continue to use the road will have their utility reduced. For only a very small number of users will the minutes saved justify the dollars spent.

On the numbers in the Updated Strategic Business Case, the cost in tolls per hour saved are well in excess of $22/hour, the estimated value of time saved. Further, evidence is that the actual value of travel time saved to motorists is well under $22/hour, perhaps as low as $6/hour. See, for example, http://www.smh.com.au/nsw/sydney-motorists-unwilling-to-pay-for-more-toll-roads-study-20151110-gkv5b3.html

According to the business case the time saved is 'up to' 10 to 15 minutes, but only on the longest trips.

Saving 15 minutes for a toll of around $8 means a cost per hour saved of around $32 - well in excess of the estimated value of time saved for all users except 'business users' and heavy vehicles, but heavy vehicles pay three times the toll. For heavy vehicles, the cost per hour saved will be around $96, again, in excess of the estimated VTTS, and probably well in excess of the real VTTS.

Further, the Updated Strategic Business Case estimates that 24% of travellers are business travellers. This is not in line with State recommendations, which recommend using a figure between 8% and 12% - meaning that at most, 8% to 12% of users might be better off. The rest will be worse off.

People may still use the New M5, to avoid congestion on parallel arterial roads, but even so, they will be worse off than if the New M5 were not to be built.

Last, but not least, those that do not drive will also be worse off, because the benefits of the project, low though the are, will still exceed the revenue.

Typical recent toll roads have been sold for 1/3 of the cost of construction - and that may be optimistic for WestConnex, given its

higher than average cost to patronage ratio.

If the direct cost to build WestConnex exceeds the revenue achievable by 2/3rds, it will represent a loss of $12B of tax-payers money.

None of this considers the very real costs on residents of the areas that the New M5 will travel to, from and through.

This risks being a missed opportunity for a real solution to the very real problems that Sydney faces.

WestConnex is an expensive way to make Sydney's roads worse.

It should not be allowed to proceed.

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Content:
MONEY BETTER SPENT
WestConnex comes at not only a huge cost that is blowing out at the rate of over $2 billion a year. It also comes with a massive opportunity cost. The $16.8 billion and rising that would be spent on WestConnex is money that would be taken away from hospitals, schools, regional roads, and the public transport improvements that are urgently needed - not just in western Sydney, but many parts of regional NSW. If this $16.8 billion was spent on public transport and effective road management, a project like WestConnex would not be necessary.
Just many more reasons to object to the westconnex

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Content:
EIS - LACKS RIGOUR
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.
Just many more reasons to object to the westconnex (no integrity)

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Name: Nigel Donnelly
[redacted]

Address:
[redacted]

Erskineville, NSW
2043

Content:
The EIS for Stage 2 (New M5) of the Westconnex makes a completely inadequate account of the environmental impacts of this most ill-considered proposal.

The stated purpose for Westconnex is to provide a solution to improve access to Sydney Airport and the Botany Bay port. The EIS should compare the environmental impact of Westconnex compared to alternative solutions to solve these pressing needs, and to improving traffic flows on the M5 and M4 which seem to have taken over as the publicly stated objectives for the Westconnex.

That would require comparing the Westconnex to a combination of heavy and light rail as a solution. Not only would these provide a much cheaper solution, they would also have much less detrimental impact on the environment compared to ramping up car use by building a mega freeway through Sydney's inner suburbs. No other modern city in the world would contemplate doing this project in this day and age, for the reasons I outline below.

The EIS makes a completely inadequate account of the green house gas impact of the new freeway. Increasing green house gasses by 27% is complete madness. Australia should be doing everything possible to reduce emissions, including by opting for transport solutions which have low emissions compared to roadways. The modeling of the green house gas emissions for the Westconnex also ignores induced travel, which goes against the established economic modelling for similar roadways in modern first world cities around the world. Simple supply and demand will ensure that the meager time savings promised by Westconnex will be offset by people opting to take advantage of those savings by increasing their car use, until such time as the present levels of congestion are reached.

The Westconnex will also significantly increase congestion, noise and air polution along the entire route of the roadways and particularly in my local area. Local roads are already very congested at peak times. These include King Street, the Princes Highway, Mitchell Road, Burke Street, O'Riorden Street and many others. Pumping an additional 70,000 cars into these areas at a time when the local communities are also growing due to large scale new new apartment developments will choke these neighborhoods with traffic, noise and air pollution. The negative health impacts, particularly for children, of living near major freeways is well established. My local area is full of families with young children. If the Westconnex is built these families will have to decide whether to subject their kids to a decade of construction noise, dust and air-pollution and then live in a neighborhood dominated by vehicle traffic and the particulate and carcinogen exposure that the car exhaust will bring.

The impact on Sydney Park is completely dismaying. My wife and I take our very young kids to Sydney Park most weekends as it is the only large nature-space in our area. I had previously looked forward to my kids being able to free-play in the forested areas of the park and the new wetlands, much as I had done growing up near the now largely disappeared patches of urban bush in suburban Sydney in the 70's and 80s. This is a type of play that a whole generation of kids has missed out on. Councils like Sydney Council now recognise that all people and especially kids need access to nature. To take a chunk out of the only nature-

space the thousands of kids in our area have and build an LA style spaghetti freeway junction where trees and ponds used to be, next to where kids play and families go to reconnect with nature and friends, is simply disgusting and betrays the disdain (and in some cases, hatred) that the proponents of the Westconnex seem to have for inner city families. Should the Westconnex be built I would no more encourage or even permit my children to go on their own to Sydney Park to play than I would take to play next to the M5 or M4. I feel the same way about the patches of bush in inner southern Sydney that will be destroyed by the M5 expansion.

The EIS pays scant attention to these issues. It reads as one would expect a report to read if were prepared by a company with significant clients in the fossil fuel and roadways industries and who earns significant local revenues from State Government contracts. A project costing $17 billion and much more should the inner west tunnel be built, and which is intended to solve Sydney's (real) congestion problems, deserved an EIS prepared by completely independent experts. It deserved a proper business case. Both should have weighed up alternatives such as heavy and light rail. Both should have been based on best practice solutions for building sustainable modern, high tech cities.

Instead, the EIS, like the broader proposal, represents the pinnacle of everything that has been wrong with governance in NSW for the last 30 years.

Drop this mad proposal. Go back to the drawing board and come up with something intelligent, effective and way less expensive and polluting. Sydney deserves it and my community will not stand for anything less.

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Content:
WESTCONNEX MAKES NO SENSE
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.
Just many more reasons to object to the westconnex

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Content:
INCORRECT THINKING
Traffic on the existing M5 East exceeded capacity "within months" of opening (New M5 Project Overview, November 2015), including recent road widening. This lack of capacity is, in part, the rationale for the construction of the New M5. Managing demand on the M5 East and providing high quality public transport alternatives for those who can change mode would be a more effective long term solution that simply a `predict and provide' approach, yet this alternative - along with many others - has not been assessed.
ANother reason to object to the westconnex

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[redacted]

Name: Wendy Sanderson
[redacted]

Address:
[redacted]

Kingsgrove, NSW
2208

Content:
Please see attached PDF

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SUBMISSION IN RESPONSE TO EIS FOR CONSTRUCTION OF NEW M5 WESTCONNEX

Background

Our names are Wendy Sanderson and Garry Feeney. We live with our adult children at 53 Glamis Street Kingsgrove.

We purchased this property in 2007 and have been residents since then.

The existing M5 runs at the bottom of our street and was there when we purchased our property. We considered this when purchasing the property but were satisfied that it would not impact on our amenity, health or well-being. Up until now it has not adversely impacted on us in any way.

Key factors in our decision to purchase this property were related to its location and access to amenities, including:

- The attractive green outlook from Glamis Street looking towards the M5 earth mound at the end of the Glamis Street and the Beverly Grove Linear park
- Easy walking access to Kingsgrove Station and the Kingsgrove shopping precinct via the Beverly Linear Park path and the Kaningal underpass
- Easy access to a pleasant and safe pathway and cycle way for exercise, walking the dog and cycling
- Glamis Street being a dead-end street and thereby having very limited through traffic
- Easy access to all areas of Sydney by proximity to King Georges Road, Kingsgrove Road and the M5
- The quietness of the area – we hear no noise from the M5
- Our backyard adjoins Garema Circuit, meaning that the properties behind us are mainly warehouses and light industrial business. Therefore we have no neighbours overlooking our property and there is almost no noise from these properties, day or night.
- Easy walking access to green space and recreational facilities at Clempton Park via Garema Circuit.

However, we now unexpectedly find ourselves right in the area of Kingsgrove most affected by the widening of the M5, the construction of the 2 new tunnel entrances and the construction of the air filtering stack at Kingsgrove. To quote WestConnex, “The western connection of the New M5 occurs between King Georges road and Bexley road within the existing M5 Motorway corridor adjacent to Canterbury Golf Course and Beverly Grove Park.”

Our street, Glamis Street, along with Armitree Street and Rose?? street runs at right angles between Moorefields Road and the Beverly Grove Linear Park. All the major construction will occur at the end of our streets or close by. All environmental impacts of this section of the New M5 will directly affect us.

We are very concerned about the environmental impact of the proposed project on our amenity, health and well-being. The considerable advantages of our home’s location are now directly under threat by the proposed M5 works. The effects will be felt by us every day and will be felt both during the 3 year construction period and after the opening of the new works.

Our submission outlines how we as residents of Glamis Street will be affected by both the construction phase and after completion and makes clear our concerns regarding the negative environmental impacts we will suffer.

Impact on visual environment from Glamis Street looking towards the M5 & Beverly Grove Linear Park

	Before construction of New M5	During Construction of New M5	After construction of New M5
Description	• Attractive green natural outlook • Earth mound covered with vegetation • Open grass area in front of mound • M5 not visible to residents	• Temporary sound barriers directly visible at end of street • Temporary structure unlikely to be made attractive or maintained to a high standard • Kingsgrove North construction compound visible at end of street	• Earth mound not replaced • Little or no vegetation to reduce maintenance along the M5 • M5 highly visible to residents • Unattractive concrete sound barriers • Clear perspex sound barriers • M5 clearly visible • Traffic visible if perspex used • Reduction of open space beside M5 • Air-filtering stack on south side of M5 visible
Environmental impact	• Visually attractive natural environment • People-friendly scale • Positive impact	• Visually unattractive boards in place for 3 year construction period • No green space or natural environment • **Negative impact**	• Unattractive man-made environment • Little or no natural vegetation restored • Monumental scale – not people-friendly • Traffic visible to residents • **Negative impact**

Impact on pedestrian and cycle access to Kingsgrove Station & Kingsgrove shopping precinct from Glamis Street & surrounding streets

	Before construction of New M5	During Construction of New M5	After construction of New M5
Description	• Access via Beverly Grove Linear Park path and underpass at Karingal Street • 15 – 20 minute walk from Glamis Street to Kingsgrove Station • Well-maintained, even path for safe walking and cycling • Wide enough for use by parents with prams and persons in wheelchairs • Wide enough for a safely shared walkway and cycleway • Path is well lit at night	• Temporary path provided alongside temporary sound barrier • Temporary path unlikely to be made attractive or maintained to a high standard • Temporary path will run along the outside of the temporary barrier • Concerns/issues: ▪ Safety and amenity of temporary path – width, surface, lighting, etc ▪ Safety due to proximity of the path to the construction compound	• Path to be restored – details not finalised
Environmental impact	• Quick, easy and safe access to Kingsgrove Station, buses, shops and services • Manageable walk for most residents • Very high use by school children, residents using public transport for travel to and from work, residents accessing local amenities • Reduces residents' reliance on private cars to reach public transport (trains and buses) and encourages us of public transport • Connects Positive impact	• Increased distance and time required to reach Kingsgrove Station due to new route of temporary path being longer than existing path. (see below) • Residents become more reliant on private cars resulting in increased traffic. • More difficult for residents to access public transport, amenities, service and schools. • **Highly negative impact**	• **Unknown impact**

Residents' access to Kingsgrove Station and shopping precinct via Beverly Grove pathway during Construction phase

- As outlined above, most residents can easily walk or cycle to Kingsgrove Station and the shopping precinct. The path is in use all day and at night. Local residents and people who are employed in the hundreds of business in this area will lose access to education and employment.
- If this access route is closed, even for short periods of time, the disadvantage to residents will be extreme.
- Instead of walking to the station along a flat easy path, residents of Glamis Street would have to walk up a very steep hill to Moorefields Road, along Moorefields Road to Kingsgrove Road, and then along Kingsgrove Road to the Station. This walk would take at least 45 – 60 minutes and could be considered difficult due to the steep incline of the hills. It would only be accessible to the very fit and healthy with plenty of time to spare. It would not be accessible to the elderly or disabled, school children or mothers with prams.
- To drive to Kingsgrove Station can take as long as 25 minutes in periods of peak traffic, due to the existing traffic congestion on Moorefields Road and Kingsgrove Road. This is not an option for residents reliant on public transport, eg university students, the elderly.

- Is there a guarantee that residents' access to Kingsgrove Station, etc via the path will be maintained **at all times** during the construction? If this access is not maintained residents of the North Kingsgrove area will be cut off from reasonable access to vital amenities and services which are primarily located on the other side of the M5. The impact on residents will be severe.

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Name: Andrew Nicholson
[redacted]

Address:
[redacted]

Fairfield, NSW
2165

Content:
To the Director, Major Planning Assessments, Department of Planning

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

Global experience of major toll road construction has demonstrated conclusively that these projects are enormously expensive and counter-productive. WestConnex will increase air pollution and encourage more car use, quickly filling the increased road capacity. It is not a long-term solution to Sydney's congestion problem.

The fact that the State Government has already signed multi-billion dollar contracts for WestConnex before this EIS was even placed on public exhibition undermines community confidence that this is a genuine consultation process.

This EIS considers benefits for all stages of the project but doesn't address the negative impacts along the whole route.

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

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Name: Rosemary Thorburn
[redacted]

Address:
[redacted]

Petersham, NSW
2049

Content:
The proposed M5 is not a good solution to Sydney transport as it will devastate the local environment and community while creating a massive scar in the heart of vibrant suburbs. Cars create so much pollution and use fossil fuels so everything should be planned towards reducing our dependency on them. Sydney Park provides a precious green space for many Sydney-siders; it is an oasis of trees, fresh air and water which would be severely degraded by the project.The suburban roads around the St Peters Interchange and beyond will become congested and the amenity for residents, schools, businesses and visitors will be severely reduced.
Public transport is always a better option than private cars as a large population needs a clean and efficient system which massive road systems do not provide. The huge expense of WestConnex cannot be justified and this money would be better spent on public transport which is a much more efficient option for everyone: workers, students, the elderly, and the disabled.
The whole Westconnex project is a very poorly argued development proposal with each section overly dependent on another. The current proposal is grandiose and unviable; not only will it not provide a suitable traffic solution but will ruin the quality of life and health of so many residents of Sydney. It will create an unjustifiable impact on air quality for a large area of Sydney. This is not a smart or safe strategy of transport for the community when the negative impacts will far outweigh any benefits. I strongly object to the unacceptable impact the project's construction will have on local residents, businesses and schools.

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Content:
SUBMISSION TO M5 EIS

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.

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.

We have lived in the area for 15 years and have noticed the dramatic increase in local traffic particularly due to the population of Erskineville doubling in the last two years. It will double again in the years to come with the completion of all the high density housing planned around Sydney Park. Have any of the studies taken into account the projected FUTURE local traffic models or just existing?
Driving from Erskineville through Alexandria to Randwick what should take 15 minutes often takes 40 minutesand that is NOW .....what should we expect in the future? CRAZY!!!

I have not made a reportable political donation.

Your sincerely
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SUBMISSION TO M5 EIS

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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.

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I **have not** made a reportable political donation.

Your sincerely

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Name: Anna Timbrell
[redacted]

Address:
[redacted]

Marrickville , NSW
2204

Content:
I object to Westconnex on the grounds that there is no government objective to promote and encourage alternate forms of transport other than the private motor car - whether that be public transport or cycling.

This is a yawning omission from policies about meeting Sydney's growth challenges.

Sydney's future transport needs - particularly in densely population inner city areas - should not be met with roads.

How many light rails routes could be built with the cost of the M5 east?

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Content:
ENVIRONMENTAL VANDALISM
Residents in south west Sydney will suffer a huge loss of amenity as a result of the existing M5 being stripped of its green space and vegetation, particularly when residents fought so hard to get these green spaces established and thriving. I also strongly object to their concrete noise walls being replaced with transparent barriers. These will be right next to hundreds of homes, who will now be forced to look at (as well as listen to and breathe the fumes of) lanes of motorway traffic just over their fences. It is utterly unacceptable to prioritise the views of passing motorists over the privacy and amenity of people who live in an area.
Just another reason to object to the westconnex

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Content:
COMPULSORY ACQUISITIONS - UNFAIR TO START WITH AND ' A SUCK EGGS' COMPENSATION A KICK IN THE GUTS
Residents affected by compulsory acquisitions are being offered below-market prices for their homes and businesses, which has caused additional and completely unnecessary distress and trauma for the owners. I find it disturbing that the NSW Government was warned three years ago that the compulsory acquisition process was unfair to those whose properties were being forcibly taken, yet has both failed to make the changes recommended and actively suppressed the report that handed down these findings. Just another reason to object to the westconnex

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Content:
DESTRUCTION OF SYDNEY'S HERITAGE AND LIVING ENVIRONMENT
Heritage buildings would be destroyed for this project, while others would be isolated in a flood of traffic. e.g. terraces next to construction compounds and motorway in Campbell Street. Plenty of trees will be torn down. None of this makes sense in today's environment where we need to look towards our future of this planet not destroy it.
Just many more reasons to object to the westconnex

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Name: Andrew McMillan
[redacted]

Address:
[redacted]

Alexandria, NSW
2015

Content:
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.

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 and more sustainable infrastructure.

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Name: Stephen Males
[redacted]

Address:
[redacted]

Bonnyrigg, NSW
2177

Content:
I oppose the WestConnex project, as I believe the money should be spent on upgrading public transport (higher frequency trains and more separated cycleways).

I believe it is Government policy to provide a high-quality, active transport link along the length of any road project. In this regard, I would like to express my support for a separated cycleway roughly following the route of the M5 East Tunnels.

This route would begin at the existing M5 East intersection with Bexley Road, continuing the existing shared paths parallel to Wolli Creek and the East Hills Railway Line and ending at Cooks River with connections to the Cooks River Cycleway.

If WestConnex must go ahead, I believe the project must include plans to fund and deliver this route to overcome the missing link between the M5 Linear Cycleways and LGAs of Hurstville and Bankstown with the Airport (one of the major employers of people in south western Sydney).

The only way WestConnex can work is if more cars are taken OFF the roads, otherwise drivers will just fill up the available space, turning WestConnex into another car park for which Sydney is, embarrassingly, infamous for.

I hope this will be seen as an opportunity to increase the modal share of non-car trips, as the government has pledged to do.

Thank you for the opportunity to comment.

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Content:
I object to the EIS for this project because:
1. impact of the total impact of the full west connect project has not been assessed in any reasonable way
2. there is no evidence that people actually want this proposal or that it will actually improve transport problems
3. it is known and there is evidence to say many users of tunnels actually stop using tunnels once tolls are started, in which case it can be expected tunnel proposal will never meet its objectives
4. the EIS for M5 section has not properly addressed alternative options for addressing current traffic problems.
Whilst there is a small section on alternatives, these have not been given proper analysis or review and in addition, not enough effort has gone into proper review of public transport alternatives.
5. In the EIS there is mention that existing air pollution levels in Alexandria and St Peters areas are already over Aust National Health Standards. Any increase in air pollution, of which there will be no doubt given the stated increase of 10 times no. of cars (in each direction) in Euston St IS NOT ACCETPABLE nor is this in the public good.
6. there has been no proper address in the EIS on the impact of the increased traffic the new M5 will bring to local communities inc. Alexandria, St Peters + neighbouring suburbs.....
7. the EIS should not be approved without detail planning + impact assessment of increased traffic on local areas in particular due to expected rat running that will occur with increased traffic on already very heavy traffic to Euston Rd, Mitchell Rd, Wyndham and other streets.
8. road widening is mentioned for part only of Euston Rd however there has not been adequate attention or resolution for where that increased traffic will go....
9. I completely object to this section of M5 being approved without any commitment given to completion of the remaining section, to take traffic to botany- this omission needs to have, bipartisan agreement agreement now. this agreement should be required before any approval is given to EIS for M5 section to St Peters or any other individual sections of the project.
10. it is not acceptable there is an omission of how increased traffic will be managed. Whichever gov department is responsible for addressing this issue, whether it is RMS or council or department of planning or whom ever, THIS NEEDS TO BE ADDRESSED BEFORE THIS EIS IS APPROVED, simply leaving this to be addressed after the project is complete is SIMPLY NOT GOOD ENOUGH.
11. as partial federal $ have and will continue to be spent on this project, a proper business audit should be done asap particularly when there is no evidence that the majority of NSW residents, nor the rest of Australia actually want this project in preference to improved public transport.
12. there was not enough time given for residents to properly understand and respond to this project which will have major impact on local communities as well as require significant expenditure of tax payers money.
13. the quality of this EIS is not of a standard expected or required for such a large project.
14. I do hope it will not be approved as it will not generate an appropriate benefit to communities.

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Richard Thode

[redacted]
Newtown NSW 2042

[redacted]

28 January 2016

Director Infrastructure Projects
Planning Services
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Director,

EIS submission regarding Application Number SSI 6788
WestConnex New M5 St Peters Interchange –

Before starting this submission I yet again visited Sydney Park to clarify what I wish to say in regard to the New M5 St Peters Interchange, and the WestConnex New M5 Project more broadly.

I will first address the public health issues, and follow this with some more general comments regarding the EIS and the New M5 Project itself. My responses are informed by nearly 30 years working in industry, and a further 20 years in the health sector.

Public Health

1) Green space: Parklands and other green spaces act as the lungs of a city. Mature trees capture carbon dioxide and trap some or all of the particulate matter resulting from industry and transport and from domestic uses of energy, as well as providing shade and a "microclimate" in their vicinity. Further, they are a haven for native wildlife.

Sydney Park has been over 30 years in the making, and now provides all of these benefits. The resumption of land for the New M5 St Peters Interchange will result in the destruction of a large number of mature trees (many hundreds if not thousands) and the loss of a substantial part of the southern part of recently re-developed parklands. Recent information suggests that nearly twice the area originally advised will now be taken from Sydney Park for the New M5 Project (14,000 square metres – about 1.5 hectares – instead of 8000 sqm).

The motorway network will make the eastern and southern perimeters of the remaining parklands less accessible and less enjoyable to use – surely not a good environmental outcome.

2) Unfiltered ventilation stacks: The impact of particulate matter released from heavy vehicles is detrimental to health. Ventilation stacks concentrate this pollution and then spread it across a broad area. The EIS suggests that this is not harmful, and maybe this claim could be true under optimal weather conditions but it is unlikely to be so under still conditions or light winds, and particularly not so at times of temperature inversion.

For some inexplicable reason the WestConnex New M5 tunnel design does NOT include filtration to mitigate the health impact, meaning that particulate matter (in categories $PM_{2.5}$ and PM_{10}) will be discharged. I had naively believed that the use of unfiltered ventilation stacks was a flawed design feature of the past, but it seems this is not the case.

The negative health impacts of such particles are well documented and include respiratory diseases such asthma and lung cancer, cardiovascular diseases and other cancers. Particulate matter is classified by the World Health Organisation as a Group 1 carcinogen, the worst category.

Coming more specifically to the St Peters Interchange, because of the proximity of Sydney Airport the UNFILTERED ventilation stacks will not be as high and their speed of ventilation will be lower than that of other stacks along the WestConnex route. This will increase the detrimental impacts on

both road users and local residents. You will note that I say ventilation stacks (plural) because, **although this EIS avoids mentioning it,** a second stack will be required at St Peters for Stage 3 of the WestConnex Project (linking M5 with M4). This will further worsen the health impact in my local area.

Even if the EIS is found acceptable by the Department of Planning and Environment, something that I hope does not occur, it should be mandatory for all ventilation stacks to filter out particulate matter.

3) Local traffic: is expected to increase by five to ten times existing levels over the next ten to twenty years. No proper consideration is given to the health impact of such vastly increased local traffic volumes resulting from (1) induced traffic from the M5 and (2) increased traffic from increased population density resulting from high-rise residential developments in St Peters/Alexandria. Such traffic will deliver a very substantial additional burden of pollutants at surface level.

4) Parklands: are healthy places for exercise for our increasingly obese population. As well, the Inner West of Sydney is a major residential growth area, meaning that there will be a substantially increased need for parklands. They should certainly NOT be reduced in area.

While pictures (artists' impressions) published by WestConnex appear to show additional parkland under the proposed St Peters Interchange, Sydney City Council advises me that most or all of this land will be closed off from the public.

This raises the further question of care and upkeep of this particular land. It could well turn into a neglected area acting simply as a reservoir for weeds, and a place for "undesirables" to hang out, and thus have an extremely undesirable environmental impact indeed.

5) Broader validity: You will note that these remarks regarding public health are also valid for other parts of the New M5, not just the St Peters Interchange.

Chapter 11 of the EIS addresses Human Health and would seem to trivialise these concerns (and also the health impacts of noise and vibration). I include some quotations: -

11.3.1 Construction

- Air quality problems during construction "are not considered to be significant".
- "The need for additional noise mitigation measures for works during night time would be considered during detailed design works for the project".

11.3.2 Operation

- (Chronic exposure to VOCs/PAHs) "Calculated lifetime cancer risks ……. are considered to be tolerable".
- Health effects of particulate matter ($PM_{2.5}$ and PM_{10}) "… include mortality and morbidity effects." (i.e. death and illness).
- "The greatest increases in $PM_{2.5}$ occur in existing commercial/industrial areas of St Peters, Alexandria and Tempe. In relation to residential areas, the greatest increases occur in the area of Rockdale (Bay Street) and Alexandria (Campbell Road adjacent to Sydney Park)."
- (Worst case) "Health effects identified and evaluated in this assessment that relate to changes in short-term concentrations of NO_2 and $PM_{2.5}$ require further assessment."

This is hardly satisfactory when approval for the St Peters Interchange and roadway changes around Sydney Park will be granted (or not) against the current EIS, and not against future studies.

Moving beyond health issues, my next remarks relate to the WestConnex Community Update of November 2015. This makes the point that WestConnex will (ultimately) "form a continuous free flowing motorway with connections to the city, airport and port".

(a) The New M5 motorway is shown in plans to skirt the airport (NOT to connect to it) and it goes nowhere near Port Botany. Future plans may include connections to airport and port, but they are not addressed in the current EIS. Yet they are intrinsic to the long-term impact of traffic flows on the area under consideration, in particular to freight movements.

(b) The rather attractive artist's impression of the "upgraded" Campbell Road on page 1 of the November 2015 Community Update from WestConnex is not realistic. Such a scene is perhaps possible at around 7AM on a Sunday morning, but from nearly ten years of traveling from Newtown to work at Liverpool Hospital it is very clear to me that the typical picture of the M5 is nose-to-tail traffic crawling either eastbound or westbound - or crawling both ways at the same time. There is no reason to believe this will change during times of peak usage unless ways are found of removing or hugely reducing heavy transport on the route.

(c) Comparison pictures showing the fairly quiet tree-lined street that is the present Campbell Road versus a traffic-clogged picture of the M5 at 6PM on a Friday afternoon would more honestly show the environmental impact of this supposed improvement to our local traffic infrastructure.

Traffic Route

I now turn to the route of the New M5 motorway.

Motorway itself: The EIS makes the bald statement that the New M5 will *"cater for the diverse travel demands …… best met by road infrastructure."* It is unclear whose opinion it is that the provision of such road infrastructure will achieve this claim. There are very many thousands of Sydneysiders who would dispute this.

Canal Road: Only a few hundred metres to the south of Campbell Road is Canal Road, an existing major traffic artery that already connects to Gardeners Road and further to the airport and Port Botany. I do not understand why it is necessary to create a new traffic link and resume residential areas and parkland instead of simply expanding the capacity of Canal Road. If you will forgive my choice of words, this seems like completely unnecessary vandalism of areas adjacent to Sydney Park and to the park itself.

Access to Port Botany: Previous traffic studies have emphasised something I first became aware of in the late 1960s when I was studying for my first degree, a Bachelor of Commerce specialising in Economics. Bulk cargo is most efficiently moved on land by TRAINS, and definitely not by road transport. I do not know all the details but I understand that plans exist for a major rail link from Port Botany to Western Sydney redistribution hubs that has the potential to remove around half of the existing heavy transport from our roads. This is very desirable, and public monies would be better spent on such a project than on the WestConnex New M5 motorway.

Moving beyond the EIS itself

Costs – public and individual:

(a) The estimated cost of the New M5 has ballooned from an already substantial $10 Billion to nearly $17 Billion before the project has even received approval to commence. With very little imagination it is easy to see a final price closer to $25 Billion than to even $20 Billion. This is an extraordinary amount of money to spend on a motorway that will result in disastrous traffic congestion in the Inner West of Sydney, destroy the vibrant atmosphere of the area, and quite probably not achieve its desired result.

(b) The ongoing cost to future generations resulting from the transition to tolled roadways requires economic justification. This has not been forthcoming. I have added my name to the demand for review by the Commonwealth Auditor-General, to ensure that proper economic scrutiny is applied to this quite extravagant Project.

Design Quality: Good industrial practice makes it clear that the only way to achieve good quality is to design it into the product. It cannot be achieved "by retrofit" AFTER the event. Demming made it clear many decades ago that trying to achieve a quality outcome when quality is not designed in from the outset is close to futile.

The EIS and related documentation make it clear that should the estimates of transport volumes turn out to be different in practice, WestConnex, the RMS and their associated entities can take actions that will result in further environmental impacts not addressed within this EIS. This surely shows that the assumptions underlying the EIS are doubtful. Unfortunately structures have been put in place to ensure that such assumptions are hidden from scrutiny by the public and from peer review.

In summary, I strongly oppose the WestConnex Project, in particular the New M5 St Peters Interchange, for both health and economic reasons.

Yours faithfully

Richard Thode

B Com (Econ), MCH, Grad Cert Health Econ

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Content:
I strongly object to the proposed New M5.

The government should instead invest the funds in public transport.

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
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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.

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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.

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Name: Richard Plumpton
[redacted]

Address:
[redacted]

Newtown, NSW
2042

Content:
My wife and I are strongly in opposition to the new M5 St Peters Interchange given it will bring untold disruption to our local area as well as the new M5 being a waste of $5 billion of taxpayers money that would be much better spent on our public transport system.

The increase in traffic to an already overloaded road network in this area is certainly not what I would call good planning, with Sydney Park - one of the few genuinely good areas of open space in this area being severely impacted by increased infrastructure, worsening air quality and overall congestion around it.

We also have 2 young daughters - one of whom we would have to somehow transport through the proposed gridlock in St Peters to her community pre-school there.

Given the clear risks facing the world from climate change, and in particular Australia given it is already a country of climatic extremes, it is quite staggering that we are still looking to fund and build poorly thought through road infrastructure when all the forward-thinking countries of the world are investing heavily in public transport infrastructure rather than more roads (that always promise solutions to traffic congestion, but in reality either exacerbate the problem or just shift it to another area - like St Peters!)

I urge you to reconsider this proposal and invest it in real transport solutions that will actually make the urban infrastructure of Sydney a more desirable place to live in rather than much worse. Surely we can find a way to make a city like Sydney more liveable with infrastructure investments rather than less?

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[redacted]

Name: Brendan Hill
[redacted]

Address:
[redacted]

Alexandria, NSW
2015

Content:
I strongly object to the entire Westconnex project. Please see attached PDF with all objections.

Thank you
Brendan and Krystina Hill

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Brendan Hill & Krystina Hill

357 Belmont Street Alexandria NSW 2015

[redacted]

Date: 28 January 2016
Reference: Submission to Westconnex EIS, project number SSI 14_6788

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

We strongly object to the entire Westconnex project.

The budget has already blown out from 10 billion to 17 billion before construction has even started – who can imagine what the final crippling financial cost of this 1950's project will be? There is ZERO data to back this flawed project. You have hired a proven corrupt company for the traffic modelling. Awarded contracts before business case, EIS were completed.
Negative cost-benefit ratio (these figures have been fudged in reports), shocking effects to the environment and local communities.

Destroying Sydney Park to dump the traffic at St Peters Interchange. Euston road is already at 110% capacity. With the new 6 lane plan this road will be at 700% capacity. How are the cars going to get to the CBD and other locations?

$26 in tolls to use from the West to CBD. Who will use this? Where are the cars going to go when they get to the CBD and St Peters?

If this does go through I will be moving and taking my tax payers money to a forward thinking state, not one stuck in the 1950's rolling out outdated tunnels and roads. This will cripple NSW for decades. The entire process has been proven to be corrupt. I don't know why this is not front page news.

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 – a process known and recognised internationally as "induced demand".

Even the EISs produced for the various stages of Westconnex show it is not a long-term solution to Sydney's congestion problem.

This flawed project will also divert billions of dollars of NSW and Federal taxpayer money into a tollway that only 1% of people in NSW, most of whom are based in Sydney, will use.

The whole Westconnex process has been featured 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.

This project will lock Sydney into greater reliance on inefficient and unsustainable road freight instead of investing in freight-on-rail alternatives. It also ignores the development of regional freight hubs in Sydney's west that would reduce the need for this project.

The health affects of high levels of noise on local roads over a three year construction period have not been sufficiently assessed.

This EIS admits that dangerous dust pollution will be created during construction at St Peters. It proposes to water the site to avoid this. The community cannot accept this when the proponent itself (via its contractors) has failed to water the site during current asbestos removal, and has also failed to ensure this waste has been watered down at its destination sites in western Sydney.

The business case that was finally released by the government has so many redactions that it can not be interpreted by independent analysts. It should go without saying that a project costing almost $17 billion, much of it funded by taxpayers, should be transparent.

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.

We 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. In many cases the modelling does not go further than two intersections past the end of the project, even in instances where ten times the current number of cars are expected to flow onto roads past that point.

Instead communities will be left to deal with traffic and unhealthy pollution and the additional financial and social costs that will result from Westconnex.

The fact that the NSW Government has already signed multi-billion dollar contracts for westCONnex before this EIS was even placed on public exhibition undermines community confidence that this is a genuine consultation process.

We recognise there is pressure on several NSW Departments, including yours, to approve this project. 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.

We call on an independent and open audit, at both State and Federal levels, of this Westconnex project before any further work is allowed to proceed.

Brendan Hill

Krystina Hill

[redacted]

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[redacted]

Name: Kathryn Calman
[redacted]

Address:
[redacted]

Beverly Hills, NSW
2209

Content:
I strongly object to the entire WestConnex project, as it is not n the best interests of Sydney

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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 write to express my strong objection to the WestConnex New M5 East motorway proposal as well as the entire WestConnex project in entirety.

The strategic justification for the New M5 is weak and inconsistent with the NSW Governments strategic planning and policy framework.

The 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 blown out to $16.8 Billion (and expected to increase significantly) which is not fully funded. WestConnex represents a significant opportunity cost. This level of investment could deliver other projects of significant economic and social value to the state which could benefit a greater number of people and businesses.

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 Sydney into a road project with inadequate assessment, and then for the proponent to find that it is a myriad of more and more expensive toll roads, and more and more road widening in a desperate effort to try and make it work. This is not how infrastructure planning should be conducted, and thus reasonable for the community to consider that this is road planning on the run.

The weaknesses of the proposal have been amplified through poor project governance.

I strongly urge the Department of Planning & Environment to not approve the New M5 East and the WestConnex project in its entirety as it is not in the best interests for Sydney.

It is concerning that over one million people will be directly impacted by the WestConnex project and the myriad of 'complementary' works.

It is concerning that the project is being released in sections, in an effort to avoid the scrutiny of the huge social , environment and financial risks that NSW is exposed.

I consider the inadequacy of the New M5 EIS is so profound that I do not consider that it can be used as the basis for a Ministerial determination to approve the project.

In short, I reject motorway investment of this scale, in this century, stating only rail infrastructure (light, heavy, freight) can keep this city liveable and functional if we wish to maintain a 'global' economic status based on population and investment growth.

The WestConnex project does not fit within the rationale of the NSW Master Transport Plan – for which it claims it is front and center despite retrofitted after the initial Plan release:

"Regular physical activity is important to our health and wellbeing. Recent research shows that many people get an additional eight to 10 minutes of exercise each day when they use public transport. Importantly, being active for part of our journey to work or school incorporates exercise into our daily routines. The NSW Centre for Population Health has observed that public transport use, walking and cycling are associated with a number of health benefits, including a reduced incidence of obesity, higher levels of exercise and improved mental health.

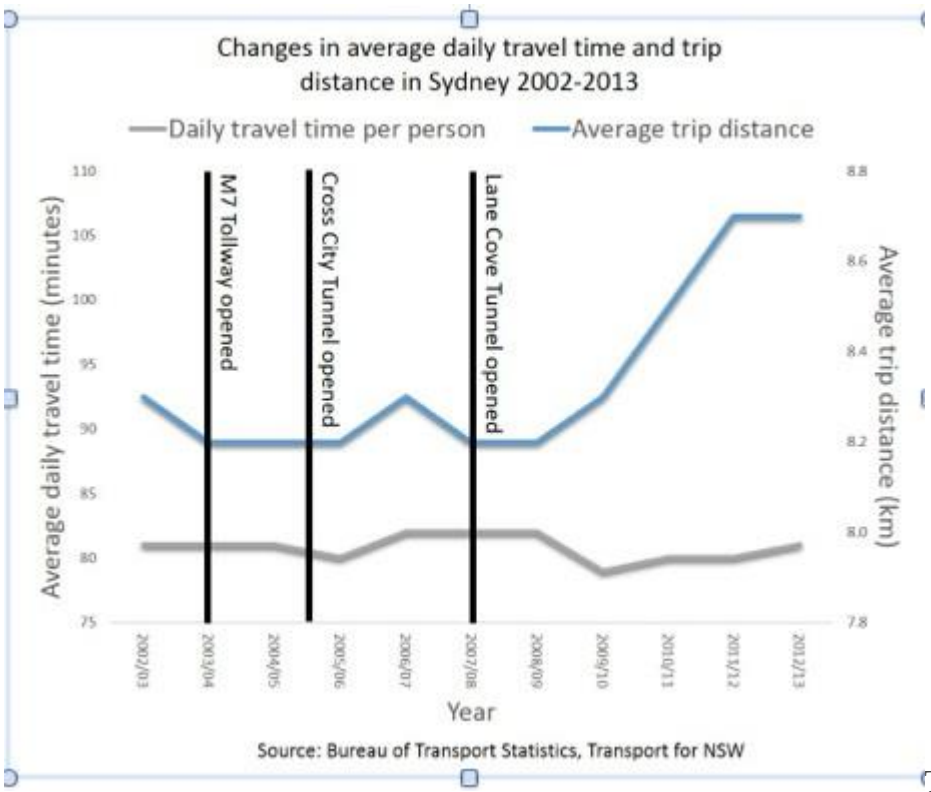
Building social and community goals into our transport planning will strengthen communities, reduce disadvantage and open up opportunities. To meet our objective of reducing social disadvantage, we will require new ways of thinking about how to distribute transport services more evenly across the State. We will need to give people healthier travel options, such as making it easier and safer to cycle to work or walk to the nearest train station. We will also need to integrate our transport system more closely with land use planning, creating well-designed cities and suburban centres that ***reduce our reliance on cars****, encourage us to be more active and produce safe, attractive and well-used urban spaces".*

1 Summary of objections based on subject area:

The very short time period has not been sufficient to address technical issues in this EIS. This is in itself a **corruption of the democratic process** to deny the public the opportunity to assess nearly 8000 page EIS during the Christmas holidays when school groups have not been granted the opportunity to respond. I request the EIS response time be extended to end March 2016.

1. The EIS does not comply with the Secretary Environmental Assessment Requirements (SEARS).
2. There are major issues with the Traffic and Transport Assessment. There is insufficient information about the modelling inputs, assumptions and methodology for the forecasts to be independently verified. There is no sensitivity analysis of key assumptions.

3. The social and environmental impacts described in the EIS are unacceptable and far outweigh any benefits of the project. **Because of flaws in the modelling, the actual impacts are likely to be even greater than those forecast.**
4. The project does not meet the project objectives.
5. Many of the project objectives, such as congestion relief, could be met through better management of demand on the existing road network, e.g., through reform of road pricing. The corridor already has an extensive and high capacity road network; there is just too much demand at present for it to operate effectively. Adding more capacity will not lessen this demand; it will only serve to increase it.
6. 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 can be effective in meeting the main project objective (reducing congestion), then what is the rationale for adding more capacity
7. The project makes little sense from a transport planning and policy perspective. The role of motorways is to allow traffic to circumvent densely populated areas. For radial transport into and out of urban centres, mass transit is more efficient and economical, and has less impact on the human population.
8. The project is not in the public interest. It will be used by less than 1% of the NSW population each day. The rest of the population will pay dearly in terms of higher traffic impacts, poorer air quality, and state and federal taxes being diverted from public transport and other more worthy causes?
9. 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).
10. 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 (see graph below). 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 higher speed of tollways has simply encouraged people to move further from work, drive more, and make longer trips than before, for example, visiting shopping malls instead of local shops. It has made road more attractive than rail for freight.

11. **This predict and provide approach to transport planning has been a failure, and is being abandoned by advanced nations. In a city of 5 million people, we can never provide enough road capacity to enable everyone to live as far from work as they like, and drive wherever and whenever they like in free flowing traffic.**

2 Failure of Project Governance

I object to the entire WestConnex project as it has failed to follow the correct and disciplined project governance requirements. Please respond to the below

2.1 Lack of Transparency and Proper Process in Project Selection

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' bypassing important evaluation steps aimed at providing assurance to government and the taxpayers that the project is the best solution.

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)

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)

"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)

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

Unfortunately, the WestConnex project **does not appear to be an example of industry best practice** in project selection and transparency (see NSW Auditor General's comments below). Calls for the release of the business case have been opposed by both the Federal and NSW governments. **If there is such a compelling business case, then why isn't it being shared with the Australian taxpayers who are bearing the risks associated with this project.**

The 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 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)

2.2 WestConnex Concept

"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)

2.3 Developing the business case

"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)

2.4 Gateway review of preliminary business case

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

(p.29)

Red: critical and urgent – project strategy to address the shortcomings/recommendations is to be established before project is further progressed.

Yellow: Important and urgent – project should go forward with action on recommendations. Source: WestConnex preliminary business case Gateway review 2013.

2.5 Matters a Gateway review may have identified

"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)

2.6 Purpose of the 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)

I reject the WestConnex project in its entirety as WDA have been unable to present any evidence of project viability.

2.7 Solution mode prior to analysis

The 'Captains Call' to build a road was decided without exploring other options from an expert analysis of Sydney's congestion problems. The intricate science of public transport was ignored, as well as decades of world experience that building motorways through an inner city does not solve congestion.

This project has had nothing to do with Infrastructure Australia's processes, nothing to do with a strategic approach to building transport, nothing about getting better economic productivity, let alone sustainability.

Tony Abbott and Nick Greiner have had a bizarre aversion to Public Transport, thus leading to this enormous Folly.

It is unacceptable that out- of-touch politicians and ex-politicians should jump into solution mode and decide to build the WestConnex motorway. Leaving RMS/WDA staff scrambling to find something (anything) to justify the project.

It is unacceptable that correct project procedures of understanding the core problem and identifying the best solution that meets the cost / benefit analysis was ignored.

It is unacceptable that the recommendations of Independent Infrastructure Experts were ignored.

It is unacceptable that a spend of $16.8 billion (plus) and 10 years of destruction and inconvenience for upwards one million people is justified with a Sydney road network improvement of just one kilometer per hour. (*source KGR M5 Vol 1 page v)

On this basis I reject the entire WestConnex project as not the solution to Sydney's congestion.

The failure to abide by the Major Projects Assurance Framework and employ best practice governance from project inception has greatly reduced community confidence. The Community is being asked to comment on an EIS that is deficient in analysis of project justification.

A condition of consent for the New M5 East should include adherence to the NSW Government's Major Projects Assurance Framework. Vital gateway reviews which 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.

Footnotes

1. Inquiry into Public Infrastructure, Productivity Commission (2014)
2. Submission to Select Committee into the Abbott Government's Budget Cuts, Marion Terrill, Transport Program Director, Grattan Institute (August 2015)

Abbott is now gone. Let's that the opportunity to conduct a Federal Audit of Westconnex, the ancillory works and complementary works. Then turn to investing our money, energy and expertise in Public Transport that will enliven Sydney, particularly the Western Suburbs.

2.8 Shutting down public scrutiny

As reported SMH 17 October 2015, the largest transport project in the country – WestConnex - is shielded from public scrutiny after the Government has transferred control to a "private corporation". The Sydney Motorway Corporation. There are no representatives of transport agencies on the Board. A Board comprised of Treasury officials, builders and financiers.

According to Labor's spokeswoman, Jodi McKay, it is "all about shutting down scrutiny". She has also commented that "I do not understand how they can call themselves a private corporation when they have two minister share-holders".

This era will be long remembered as a shameful corruption of the democratic process for NSW.

On this basis I reject the entire WestConnex project as it concerns me greatly the loss of transparency by transferring the delivery of the project to a 'private company'. This is not democracy.

2.9 AECOM and Conflict of Interest

Experts and academics have been critical of the AECOM traffic studies for this project, one complaining that there is insufficient information about assumptions behind the Westconnex Traffic Model for other researchers to test it independently.

This can only add to community unease about the EIS and planning process, especially because AECOM has not used the opportunity of the EIS report to respond to or engage with independent consultants as SCG Consulting that have questioned its traffic predictions for the WestConnex M4.ely on government departments to seriously evaluate the project and engage with critiques. Unfortunately, the Planning Department will publish the responses to the EIS on its website. Westconnex and

AECOM will then prepare a 'responses report'. Planners, health experts and others inside government say they will then be pressured to sign off on the EIS, although many know it is poor social policy.

The same firm is the subject of an ongoing legal action in Queensland – more than 650 investors are suing for $150 million, claiming the company's traffic predictions for a privately-owned toll-road in Brisbane were substantially inflated

Is it too much to hope that the Minister for Planning Rob Stokes and professional planners employed by the NSW government take time to seriously consider the substantial critiques of the project? From the public's point of view, it would be so much better to stop now rather than be stuck with another failed tollway project.

On the basis on questionable independence and integrity of the planning assessment process I reject the WestConnex project in its entirety.

2.10 Failed EIS Process

An EIS is supposed to honestly and fully discuss the costs and economic benefits as well as the social and environmental effects of a project as well as alternatives to it, but the EIS for the M4 East section, King Georges Road Interchange and the New M5 EIS is nothing more than a shoddy and evasive sales pitch.

I object because the whole process has been corrupted by the agencies who are its proponents. This is evidenced by, the awarding of contracts for the project, notice of compulsory acquisition of family homes and the planned destruction of local communities, all before the matter has been considered and approved.

These factors combined have left local residents feeling sad and angry about the process to date and left many feeling sceptical that there is any real concern about their rights and welfare. In addition no comprehensive business case has been presented and the arguments in the 8000 page EIS are simplistic and lack depth.

I object that the community was only granted 60 days to review the New M5 EIS. A minimum of 90 days should have been granted.

On this basis I reject the entire WestConnex project due to the failed EIS process.

2.11 Failure to engage in Community Participation & Discussion

It is unacceptable that the community and councils have not been engaged in meaningful dialogue and involvement in the future of Sydney and this project.

- The various so-called 'information sessions' have been a sham
- The information kiosks are not attended by informed staff

- The distributed material contains information meant to mislead.
- The distributed material is specifically designed to not advertise the project

WDA repeatedly quotes unsubstantiated 'benefits' across the entire project, yet downplays negative impacts to just the immediate section.

It is time that there is a meaningful discussion on transport infrastructure in this city. It is time to address demand management.

It is time in 2016 to ramp up the campaign to raise public awareness of a healthier and environmentally friendly commute to destinations. It is time that Urban Planning incorporates models of walkability when planning new suburbs. It is time that the public become very aware of the real cost of driving – both financially and the space that automobiles and roads take up. And, it is time to really penalise single passenger vehicles when public transport is available via (eg) via tolls and congestion tax.

It is time that our cities are returned to the people. Sixty years of priority has been given to automobiles and their domination of our landscape vs the livability of our suburbs.

I therefore reject the WestConnex project in entirety, as it has not been presented in a way that enables the public to determine if the proposal is an appropriate and effective solution for Sydney's significant transport problems.

2.12 Failure to disclose negative impacts in a timely and transparent fashion

WDA has been known to hide negative information that is essential for the community to form an opinion. Recent examples:

- Information kiosks at the shopping centers and information sessions:
    - Failure to incorporate the locations of unfiltered stacks in material
    - Failure to disclose the amount of greenspace and parks lost to the motorway
    - Failure to properly disclose the tolls & reintroduction of tolls on existing roads
    - Failure to disclose the number of people that will be displaced
    - Failure to disclose the number of businesses compulsory acquired and the jobs lost
    - Failure to disclose the method of calculation & definition of "up to 10000 new jobs" and failure to deduct the permanent jobs lost.
    - Failure to disclose that there is no appropriate monitoring of PM2.5 and less.
- Information distributed to Arncliffe residents failed to disclose the horrible impact on the endangered Green and Golden Bell Frogs.
- Confirmation that an unfiltered exhaust stack at Kingsgrove was planned. WDA staff member was very evasive to confirm that this was fact in June 2015.
- The eventual disclosure stating that this stack was located in an industrial area. No. It is a business park and located near nine schools and many homes and places of employment

2.13 Failure to incorporate Community Feedback from EIS

WDA have never incorporated community feedback in their designs, as evidenced by residents impacted by the KGR M5 Interchange at Beverly Hills. Even if data contained in the EIS was pointed out as incorrect.

- The response to residents was '*we will explain it differently, so you might understand*' our (flawed) vision.
- I object that all reasonable requests by Beverly Hills residents were denied on the grounds they were not reasonable or not feasible. The real answer is that the project is delivering the cheapest possible engineering design – at a permanent cost to residents.
- I object that the community and our local councils have been denied a voice.
- I object that residents have had to take extraordinary action to be 'heard'.
- Failure to address existing significant noise by refusing additional noise attenuation of transparent walls on the span the Cooloongatta Rd bridge replacing the wire. Rejected because it was too expensive (but happy to spend the money enhancing the motorists experience)

2.14 Failure to engage highly impacted residents during constructions.

There is a consistent effort by Westconnex Liason Staff in properly informing residents of construction impacts.

Residents of Elouera St Beverly Hills were not informed that heavy vehicles would be using their street. To add insult to injury, these trucks could idle in front of peoples homes. The longest was ONE HOUR. It is not good enough that multiple residents have to remind the construction company on a daily basis that idling trucks is a breach of conditions.

Failure to advise residents of Allambee Cresc South Beverly Hills that their park at the end of their street would be used as a construction zone. No letter drops. Just suddenly turned up one Friday morning and started tearing down the trees.

Thursday afternoon. Kids playing in the park at the end of Allambee Cres Beverly Hills

Friday afternoon. Park destroyed. And to add insult to injury, the workers did not turn down their high pitch reverse beepers. This was a condition of approval. Daily reminders to the Construction Company is not good enough!!

3 Project & Broader Westconnex scheme

1) The proposed New M5 and broader WestConnex scheme are not in the public interest.

1. Any personal travel time savings generated by the project will not benefit the economy, and will be cancelled out in time by induced demand and induced sprawl.
2. The New M5 will be used by less than one percent of the NSW population each day. The costs will be borne by the whole population.
3. 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.
4. There are numerous ways of spending $16.8 billion that would deliver a much greater social and economic benefit, and would not cause so much destruction.

2) The EIS authors (AECOM) have not modelled or objectively assessed alternative policy scenarios that could meet the transport/accessibility needs of NSW's growing population (individually or in combination), e.g.:

1. Greater investment in mass/public transport;
2. Demand management/road pricing reform
3. Land use planning that places homes, employment and services closer together

3) It is no secret that the primary 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 in the scheme as a means of paying for it (through tolls). However, there are various policy alternatives for dealing with the growing freight task that have not been objectively assessed in the EIS, e.g.:

1. Improve the capacity and reliability of rail freight.
2. Increase rail/intermodal freight subsidies to match those of road freight.
3. Divert container operations to other ports outside the city centre. It does not make sense to concentrate container operations in the city centre where road access is costly and has significant impacts on the surrounding residential areas. An expansion of the

Port Kembla container terminal, which already has good road/rail access, would stimulate the Illawarra region's economy.

4. Freight demand management, e.g., incentivise shorter supply chains and local supply.

4) The new intermodal terminals at Moorebank and St Marys, along with the planned upgrades to the Port Botany rail freight rail line, will significantly increase the share of freight that can leave/enter Port Botany by rail. Against this background, spending $16.8 billion on marginal improvements to road freight access must be questioned. Is the proponent (RMS) aware of the new intermodal terminals?

5) 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. In particular the assumed toll price, on which the traffic forecasts heavily depend, has not been stated.

6) 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. AECOM has a history of overestimating the willingness of motorists to pay for toll roads, resulting in overly-optimistic traffic forecasts and financial failures (e.g., Clem7).

7) There is **no modelling/objective assessment of the travel time and accessibility impacts for non-motorised modes (walk and bicycle)** in the Traffic and Transport Assessment

8) The issue of **induced demand** has not been adequately addressed in the Traffic and Transport Assessment.

9) Given the major flaws with the 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:

1. Air quality
2. Noise and vibration
3. Human health
4. Greenhouse Gases

10) The **role of motorways in a multimodal urban transport network is to allow traffic to circumvent populated urban areas, and to connect less densely populated areas** (where mass transit is not justified). For radial transport into and out of employment/activity centres, mass transit (e.g., rail) is faster, more efficient, requires less space, and has fewer impacts on highly populated urban areas.

11) **The EIS does not consider the cumulative costs and impacts 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:

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%.
2. Serious human health impacts due to petrochemical vehicle emissions/smog, including:
    1. Lung cancer,
    2. Asthma
    3. Heart disease,
    4. Impaired lung 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. Increasing numbers of people losing sleep due to traffic noise pollution.
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 areas/buildings.
12. Irreversible biodiversity loss.

13. Less incidental physical activity from walking and bicycling (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

4 WestConnex fails the objectives of the NSW Transport Master Plan

4.1 What came first – WestConnex or the Strategic Plans?

WestConnex is an anomaly to the NSW Transport Master Plan 2012

The WestConnex EIS claims that it was a legitimate part of the long term transport planning for NSW for which it is very obvious that it was retrofitted after the event.

The NSW Master Transport Plan December 2012 was written from the perspective of improving the mobility for residents and visitors to Sydney through the modernising and connectivity of Public Transport.

The focus mentioned frequently throughout the document was to reduce car dependency and thus congestion by investing further in the various modes public transport. The main initiatives were to address the lack of rail connectivity, by enhancing the current radial mode to be a more networked and connected system. It also included complementary improvements with other modes, such as increase dedicated bus lanes plus BRT, increased cycle-ways and encouraging walkability. The livability of communities and protection of the environment was a key outcome of the Plan.

"Most of Sydney's rail network was built more than 100 years ago and is primarily centred on servicing the CBD. There has been little recent expansion of the network, with 39 kilometres of the total CityRail system of 1,050 kilometres built in the past 33 years (as at 2012).. As Sydney has grown and evolved to a multi-centred city, its needs have changed and our rail system needs to evolve to keep up with these changes."

"Businesses often cite the lack of public transport connectivity as an inhibitor to establishing a presence in the three regional cities of Parramatta, Penrith and Liverpool, as well as precincts like Macquarie Park, Sydney Olympic Park and Port Botany".

"By enabling industries to set up in the regions, in transport terms, this would reduce the impacts of dispersed employment in Greater Sydney, alleviate car dependency and long commutes, and promote more liveable communities".

The below comments – lifted from the Master Plan – succinctly encapsulate the rationale of this Plan:

"Regular physical activity is important to our health and wellbeing. Recent research shows that many people get an additional eight to 10 minutes of exercise each day when they use public transport. Importantly, being active for part of our journey to work or school incorporates exercise into our daily routines. The NSW Centre for Population Health has observed that public transport use, walking and cycling are associated with a number of health benefits, including a reduced incidence of obesity, higher levels of exercise and improved mental health.

Building social and community goals into our transport planning will strengthen communities, reduce disadvantage and open up opportunities. To meet our objective of reducing social disadvantage, we will require new ways of thinking about how to distribute transport services more evenly across the State. We will need to give people healthier travel options, such as making it easier and safer to cycle to work or walk to the nearest train station. We will also need to integrate our transport system more closely with land use planning, creating well-designed cities and suburban centres that reduce our reliance on cars, encourage us to be more active and produce safe, attractive and well-used urban spaces".

The inclusion of the WestConnex project at various points throughout the document is an anomaly to the key rationale of the original document.

NSW Master Transport Plan Vision

"*The city will become more liveable by improving the design of buildings and public areas, developing mixed-use spaces where people work and live, and creating more opportunities for people to walk and cycle to work and major service centres. Protecting our natural environment, improving access to green spaces and improving air quality will be critical. The Metropolitan Strategy for Sydney underpins this land use and planning vision for Metropolitan Sydney to 2031.*

Central to these outcomes will be an integrated and efficient transport system that is closely aligned with land use planning. Sydney's transport infrastructure and services will cater to the customer, providing diverse transport options and reduced travel times, while being readily accessible across all parts of the city. Improved public transport networks will increase productivity and global competitiveness."

***"Improve sustainability** – by maintaining and optimising the use of the transport network, easing congestion, growing the proportion of travel by sustainable modes such as public transport, walking and cycling, and becoming more energy efficient"*

"For public transport - If Under a 'do nothing' scenario, most travel in Sydney would continue to be by motor vehicle, with roughly the same percentage of trips still made by car in 2031.

*"Transport has an important role in supporting Sydney as a global city. **Strong connectivity across the city, quality public transport networks and opportunities for walking and cycling can all contribute to maintaining Sydney's role as a centre of economic and social activity".***

"The city will become more liveable by improving the design of buildings and public areas, developing mixed-use spaces where people work and live, and creating more opportunities for people to walk and cycle to work and major service centres. Protecting our natural environment, improving access to green spaces and improving air quality will be critical.

*"Central to these outcomes will be an integrated and efficient transport system that is closely aligned with land use planning. Sydney's transport infrastructure and services will cater to the customer, providing diverse transport options and reduced travel times, while being readily accessible across all parts of the city. **Improved public transport networks will increase productivity and global competitiveness"***

The Master Plan also goes on with the rationale "Currently, ***around 14 percent of greenhouse gas (GHG)*** *emissions produced in NSW come from the* ***transport sector****, making it the State's* ***second highest source*** *of emissions. In the context of population growth and increasing travel demand, mitigating GHG emissions is a major challenge for the future".*

*"****Providing people with opportunities to use public transport instead of private vehicles*** *will help to reduce the environmental impact of transport in NSW. Increased walking and cycling, particularly for short, local trips, will also contribute to improved environmental outcomes."*

" *The cost and availability of oil and the rising cost of electricity will also have a direct influence on the choices we make in procuring the most environmentally sustainable and energy efficient technologies to power our transport fleets".*

"The growing travel task is also a challenge for preserving the amenity of many of our communities. The movement of freight is rarely silent and the generation of noise on a shared network in proximity to residential areas is a recognised issue".

The WestConnex project and its horrible impact on communities, vulnerable species and the environment is a complete juxtaposition to the vision for Sydney's mobility by Gladys Berejiklian (previous Minister for Transport)

Please explain HOW WestConnex fits into the above rationale

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 center 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 M5 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 centerpiece 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.

I strongly object to the WestConnex project, as it fails to match any of the required core outcomes of the NSW Travel Master Plan.

I strongly object to the WestConnex project as it represents a lost opportunity to "Get Sydney moving". The funds required to fully implement the exciting public transport projects that will significantly improve connectivity of rail; bus, cycle and walking opportunities as proposed by Ms Berejilian will not be available. Instead, funds are redirected to a road project that is a space hungry,

low volume mode of transport. It eschews Ms Berejiklian's rational plan for Sydney, instead resulting in the perpetuation of car dependency, more pollution, more traffic noise, more congestion, and more GHG emissions. It reduces the livability and amenity of our suburbs. It removes important greenspace and vegetation that is critical for the survival of vulnerable species and for the health and wellbeing of residents.

I point out that Inner-West Light Rail patronage has increased by 68% resulting in the need for 90 more services. How many cars has this infrastructure taken off the roads. The people voted. With their patronage.

I strongly object to the misrepresentation contained in the EIS that WestConnex was part of the NSW Transport Master Plan 2012. WestConnex was retrofitted in 2013, and was never a legitimate part of the long term plan scope.

5 The project fails to properly assess alternatives

To paraphrase a misattribution of Einstein ... the definition of insanity is to do the same thing over and over again, and expect a different result.

The SEARS provide for 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 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.

Finding: FAIL

Comment: The EIS does not include cost-benefit analysis, modelling, or any other objective analysis of feasible alternatives. Only cursory descriptions are provided.

No alternative staging strategies are described or objectively assessed.

6 Cumulative aspects and proposal's relationship to rest of Westconnex works

Details of the proposal's relationship to and consistency with the broader WestConnex, and an assessment of the cumulative impacts taking into consideration the WestConnex program of works.

Finding : FAIL

Comment: Cumulative construction impacts for the New M5 and other WestConnex projects have not been modelled/reported. Only a 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:
    1. Lung cancer,
    2. Asthma,
    3. Heart disease,
    4. 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.

7 Meeting objectives of the entire Westconnex

Finding : FAIL

Comment: finds that the project **FAILS** to meet the Westconnex objectives. This will be covered in Part 3 of this submission.

8 Impact of New M5 on traffic and transport after start of operation

Requirement: 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).

Finding : FAIL

Comment :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.

9 Induced traffic

Requirement: Induced traffic and operational implications for public transport (particularly with respect to strategic bus corridors and bus routes) and future public transport opportunities.

Finding : FAIL

Comment: 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 my 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.

10 Cyclists and Pedestrians

Requirement: Impacts on cyclists and pedestrian access and safety and consideration of opportunities to integrate cycleway and pedestrian elements with surrounding networks.

Finding : FAIL

Comment: 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 transport model (WRTM) nor the intersection models (LinSig). There is no forecast of the impacts on walking and bicycling travel times and accessibility.

11 Air Quality

Requirement: 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.

Finding: FAIL

Comment: 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.

12 Human Health Impacts

An assessment of human health impacts.

Finding : FAIL

Comment: 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.

13 Noise Impacts

Requirement: 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).

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.

13.1 Sydney has underinvested in public transport over the past 30 years

In 1998 the NSW government released Action for Transport 2010 an integrated transport plan for Sydney. The plan proposed to:

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

(Action for Transport 2010 an integrated transport plan for Sydney, 1998, NSW Government p.2)

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

(p. 3)

The plan listed (at page 5) 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**) and recently to Dulwich Hill

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)

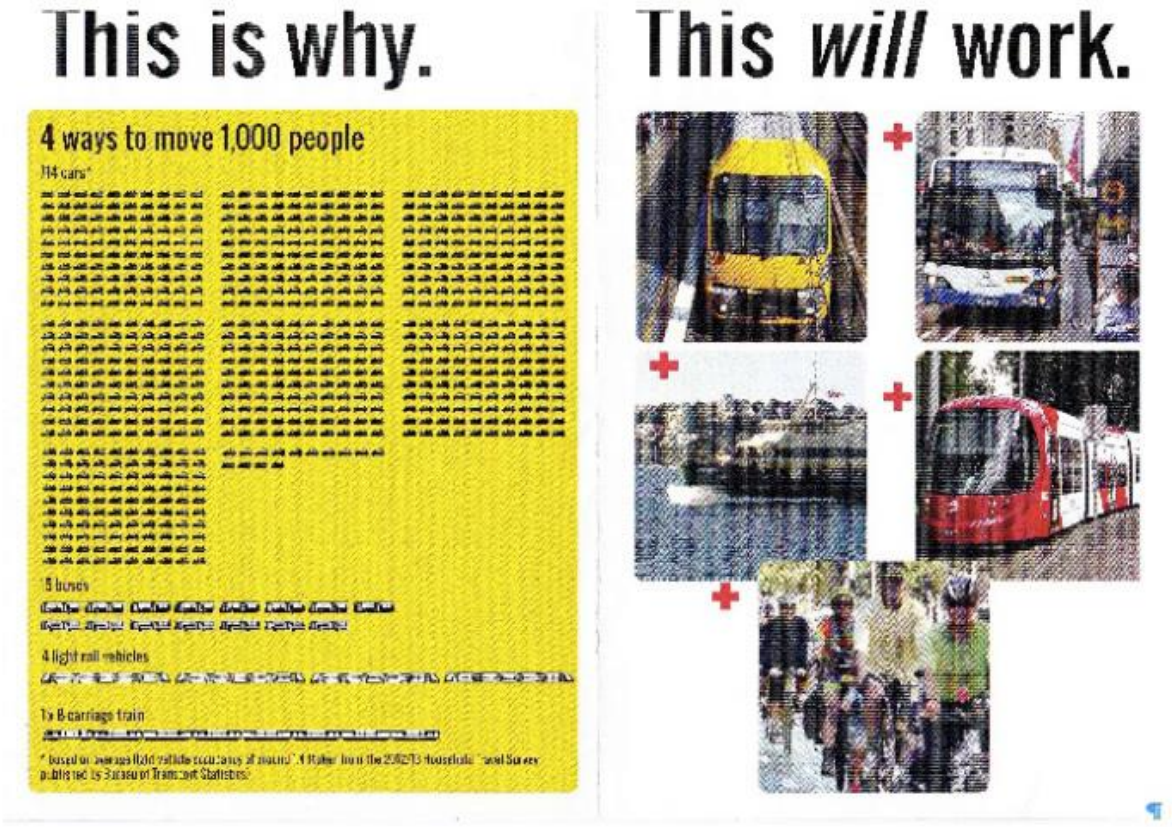
All the projects in bold were built. It can be seen from the list that every road project was delivered. Of the 16 public transport projects only four were completed.

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.

WestConnex clearly fails to:

- Reduce car dependency
- Meet the needs of our growing suburbs
- Get more people on public transport

The Benefit-Cost analysis of WestConnex is evaluated over a 40 year period. Relieving traffic congestion on the corridor appears to be a major objective of the project. The project reaches capacity in the M4 East tunnel within eight years after project completion. This does not seem to be an effective means of relieving congestion. The Cost-Benefit analysis should include costs of additional measures required over the **remaining 32 years of the project life** to maintain the claimed congestion and travel time savings. If included, it is likely that the **project costs will significantly outweigh any benefits.**



14 Failure to meet the stated project objectives

I <u>object</u> to the Westconnex project in its entirety as the core objectives are not met.

Westconnex has key objectives that the whole project is supposed to meet.

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.**

Westconnex's stated objectives have no associated targets by which their achievement can be ever be determined. For example, how can it ever be determined if the objective to "maintain regional air quality" has been met?

Objectives/targets need to be:

1. Specific

2. Measurable
3. Achievable
4. Relevant
5. Time-bound

Even though the objectives of Westconnex have been contrived to fit the project, the **project still does not meet them**.

Each objective below is accompanied by an explanation of why the project does **NOT** meet that objective. *(Ed: We counted them and there are 40)*

1. **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.**

- There is already an extensive and high–capacity 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 economical 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.

2. Relieve road congestion to improve the speed, reliability and safety of travel in the M5 Motorway corridor.

- 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 a new equilibrium between supply and demand is reached (i.e., congestion will return to its previous level)
- A better objective would be to give as many people as possible a reasonable alternative to sitting in traffic. How many people would really prefer to spend hours each week crawling along a dark tunnel inhaling truck fumes, than sitting in a modern train that takes them swiftly to their destination, where they can use the time to relax, read, work etc.
- 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 (4) than without it (3) in 2021.**

3. Cater for the diverse travel demands along these corridors that are best met by road infrastructure.

There is already more than sufficient capacity along these corridors to cater for all the essential vehicle travel. Non-essential vehicle travel could be discouraged through better demand management, e.g., road pricing reform.

4. Enhance the productivity of commercial and freight generating land uses strategically located near transport infrastructure.

- 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 them

be relocated to less populated areas, where the transport costs and externalities are lower?

5. Fit within the financial capacity of the State and Federal Governments, in partnership with the private sector.

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).

6. Optimise user pays contributions to support funding in an affordable and equitable way.

- 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.

7. Provide for integration with other WestConnex projects and the proposed Southern extension, while not significantly impacting on the surrounding environment in the interim period

- There will be significant impacts on the surrounding environment.
- 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.

8. Manage tunnel ventilation emissions to ensure local air quality meets NSW Environment Protection Authority (EPA) standards

- 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.

9. Maintain regional air quality

- 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.

10. Manage in-tunnel air quality to stringent air quality standards

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.

11. 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:
    1. Providing for energy-efficient transport modes (public transport, walking, bicycling).

    2. Land use planning that places homes closer to employment and other destinations.

12. 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.

13. Provide for improvement of social and visual amenity

- The project will reduce social and visual amenity.
    1. The concrete interchanges and pollution stacks will be visually obtrusive.
    2. The increased traffic volumes on surface roads will result in lower amenity (more noise pollution, more fear and intimation, increased crash risk etc.).

    3. 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.

14. Minimise impacts on natural systems including biodiversity

- The project will cause irreversible biodiversity loss.
- The project will contribute to climate change through increased greenhouse gas emissions. This will result in further biodiversity loss and damage to natural systems.

15. Protect surface and groundwater sources and water quality including management of contaminated areas

- The project will result in increased VKT (Vehicle Kilometres Travelled) , and therefore more contaminants (brake and clutch dust, hydrocarbon particulates etc.) being deposited on roadways and washed into waterways.

16. Reduce susceptibility to, and minimise impacts of, flooding

- 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.

17. 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

- The project is not a sustainable development.
    1. Not economically sustainable. The costs far outweigh the productivity benefits.

2. 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.

3. Not environmentally sustainable. It will result in higher greenhouse gas emissions and irreversible biodiversity loss.

14.1 Enhance the productivity of commercial and freight generating land uses strategically located near transport infrastructure

14.1.1 Failure to meet this objective

Freight benefits are an integral part of the justification for WestConnex, yet the New M5 does not go anywhere near Port Botany. It should be noted that when WestConnex was first reviewed by Infrastructure Australia it was classified as a freight project.

As detailed in the below section, with the majority of Sydney's the population located in the Greater West it makes better sense to transport the bulk of freight via rail, such as the utilisation of the planned new distribution center planned for St Mary's.

It is concerning that the Southern Gateway ancillory project will impact on the Southern Freight Rail Line requiring it to be moved by 500 meters. No details have been provided to the public as yet, but based on the outcome in Newcastle it is reasonable for the public to suspect the worst of impacts for a period of time to this freight line.

14.1.2 Freight by rail projects by private sector

According to a recent SMH article alternate investments are being made to move freight more efficiently and cheaply by rail from Port Botany.

A recent announcement by Asciano aims to have a second freight hub transporting containers by rail to Port Botany within 12 months, as it prepares to spend $100 million building a new intermodal terminal in western Sydney. This new 43-hectare hub, will be located in St Marys which is claimed as an ideal location for big retailers such as Woolworths, Coles and Bunnings, which have distribution centres nearby. It will be Asciano's second intermodal terminal in western Sydney after Chullora. The Chullora terminal started transporting containers on rail to the port two months ago.

The new hub's rail shuttle will have annual capacity of 300,000, 20-foot equivalent units (TEUs) annually. Chullora has annual capacity of 600,000 TEUs, including up to 135,000 TEUs that can run on rail to Port Botany. Chullora is running some 75,000 TEUs annually on rail to Port Botany.

At full capacity, moving freight from Port Botany by rail from Chullora could take up to 100,000 truck journeys off roads every year, according to Asciano chief executive John Mullen.

A much-bigger competing freight terminal will be opened at Moorebank by logistics group Qube and rival rail group Aurizon in late 2017.

The distribution centres at both Chullora and Moorebank are better suited for distributions in the inner west. Mr Mullen stated that with "most of the distribution centre activity is further north-west" then it makes sense to transport via a cheaper and more efficient rail mode.

The WestConnex project will perpetuate an inadequate, antiquated and highly congested transport route that will not meet the needs of the freight transport industry and the people of Sydney and NSW. The Freight Industry recognises this, and have embarked on their rail projects that will better support Sydney's global economic corridor. Why does this Government and the RMS not recognise 21st century solutions to our congestion problem?

: http://www.smh.com.au/business/asciano-spends-100m-on-expanding-sydney-freight-hub-network-20151008-gk44qp.html#ixzz3oFxu8ITj

14.1.3 NSW Government has failed in aim to increase freight by rail

The NSW government has failed in its aim of moving an increasing proportion of freight throughout Sydney on rail, leading to more heavy trucks on the road. This outcome, which Roads and Freight Minister Duncan Gay concedes is a "slight embarrassment", comes amid rapid growth in the volume of goods and commodities being moved through Sydney's container port at Botany.

The state Coalition government wants to lift the share of containers moved through the port from 14 per cent to 28 per cent by the start of the next decade. This is a downgrade from the former government's target of 40 per cent, which it never got close to meeting. But over the life of the O'Farrell and Baird governments, the rail share of containers has remained stuck at about 14 per cent. Asked about the failure to lift the share at budget estimates about the failure to lift the share, Mr Gay said: "We believe we will do it, but we are a long way off at the moment."

Mr Gay attributed the failure to move a larger share of goods by rail to improvements in truck access to the port, which started under a program set up by former ports minister Joe Tripodi.

"It is success in one area that has stopped progress in another," Mr Gay said.

The executive general manager of NSW Ports for planning and infrastructure at NSW Ports, Marika Calfas, attributes the number of trucks due to the lack of terminals to transport containers by rail, and to a lack of regulation. "We need the facilities out there to increase capacity," Ms Calfas said. "We need to be able to take the boxes somewhere."

14.1.4 Decades of underinvestment in freight rail

Tony Abbott - in his 2009 book *Battlelines*, the "humblest person is king in his own car". He went on to dismiss outright the practicality of public transport in Australia's sprawling cities: "Mostly, there just aren't enough people wanting to go from a particular place to a particular destination at a particular time to justify any vehicle larger than a car, and cars need roads."

Despite this assertion, the new Sydney motorways partly funded by the Road-focussed Abbott government are being built in the most densely settled parts of Sydney. The NorthConnex and WestConnex involve building very long tunnels. All are likely to ignore the safety recommendations from the coronial inquest by Judge Jennifer Coate into the three-truck pile-up inside Melbourne's

Burnley tunnel in 2007. Between them, the projects involve more than 23 kilometres of new tunnels. Coate urged governments to build tunnels with dedicated emergency lanes and to eliminate the need for lane-changing, but the NSW government has shown that such features won't be included.

The relentless rise of heavy vehicles in Australia's transport system over the past four decades has occurred in part because Australia has no proper charging system, and because governments have starved the publicly owned rail-freight system of investment. As a result, rail's share in moving the goods that Australians buy every day has steadily declined, while the volume of road freight has increased almost tenfold over the past 40 years, to 203 billion tonne kilometres.

This development is in marked contrast with the situation in the United States. The US still moves about 40% of its intercity freight via rail. The US rail system is one of the most efficient in the world, and it is also profitable. It's such a good business that the shrewd investor Warren Buffett recently sank $US26.5 billion into buying a rail company.

Australia's shift to the roads has locked us into a freight system that is inherently more costly, more carbon intensive and more dangerous. Figures published by the federal government's Bureau of Infrastructure, Transport and Regional Economics (BITRE) show that the cost of moving 1 tonne of freight by road over a distance of 1 kilometre (known as cost per tonne kilometre) is 7.5 cents for road, more than double the 3.5 cents for rail. The greenhouse-gas emissions for road are more than triple those for rail: 52 grams per tonne kilometre versus 15.

This road-dependent freight system also means that Australia's cost of living is much more exposed to oil price rises. The carbon-intensive nature of the system makes it vulnerable to any future moves to introduce international trading systems or other regulations for greenhouse emissions.

There's also road dependency's cost to human life. In the five years to 2011, the average number of fatalities from Australian road accidents that involved a truck of more than 4.5 tonnes was 239 a year. The comparable number for rail, including passenger trains, was 34 deaths a year, which is remarkably low given that rail moves greater tonnage than road when bulk commodities such as minerals and grain are included. This means that trucks cause around 20% of all road fatalities in Australia even though they make up only 2.5% of the vehicles on the road. The number of people injured in such accidents continues to rise. In 2008–09, the latest year for which injury data is available, 1536 people were hospitalised after accidents with trucks. Accident victims classified as suffering a "high threat to life" totalled 551 in 2008–09, an increase of 18% in eight years, according to a 2014 BITRE report.

BITRE predicts a further 50% rise in the number of trucks on our roads over the next 15 years. Despite the urgent need for policy action, the wheels of government are moving slowly.

Two key reforms would give Australia a less costly, less dangerous and more climate-friendly freight system, and they are related. The first is distance-based charging for heavy vehicles, and the second is the construction of an inland rail line between Melbourne and Brisbane, which would avoid Sydney's notorious congestion and the 19th-century coastal rail line.

Trucking has become so dominant that even the trucking companies are saying that it's in their interest to shift more freight onto rail. Fox and his company executives declined to answer a series of questions put to them, and Abbott would not comment on his relationship with Fox. But back in 2009, Fox broke ranks with the industry, and the Abbott view, and said Australia had to shift back to rail if it were to have a viable freight system.

"I'm talking against myself when I'm talking about putting things on rail," Fox told a forum at the National Press Club. Fox backed the inland rail line, but he also advocated making greater use of coastal shipping, transferring more of Sydney's trade activity to Newcastle or Wollongong, and shifting Melbourne's major port to Hastings on the Mornington Peninsula. In the early '70s, about one-third of the freight moved between Victoria and Queensland went by sea, but that has now fallen to nil. He said Australia could learn a great deal from China, which has built deep-water ports away from major cities. "We do need to move away from running transport operations in the centre of the city, particularly on the east coast of Australia."

Fox expressed what might be the vain hope that he would see **sensible reform** happen in his lifetime: "We're only here for a short time. I've got probably less than ten years to go. I'd certainly like to see some of these things that are in the **interests of the nation."**

Without the NSW Government investing in the right infrastructure , ie to invest in a more efficient movement of freight around our state and country – instead of the antiquated and polluting motorways, our country will continue to decline in profitability.

http://www.smh.com.au/nsw/more-trucks-on-sydney-roads-as-government-fails-to-hit-rail-share-targets-20140921-10jyab.html#ixzz3pDnELmvV

https://www.themonthly.com.au/issue/2014/december/1417352400/paul-cleary/roads-nowhere

14.2 Fit within the financial capacity of the State and Federal Governments, in partnership with the private sector

14.2.1 Failure to meet this objective

The WestConnex motorway is the wrong transport project for Sydney's future, a report commissioned by City of Sydney Council says.

The report argues the WestConnex motorway is unlikely to reduce traffic on local roads, exposes the taxpayer to huge financial risk, and will not benefit many western Sydney commuters. Journey-to-work figures analysed by SGS show only about four per cent of workers in suburbs such as Penrith, St Marys and Camden travel to the CBD. Moreover, about 90 per cent of these work trips to the CBD from the west are using public transport.

SGS's report also says “WestConnex shares characteristics with other motorways that have financially failed, such as the Lane Cove Tunnel, Cross City Tunnel and Clem 7 in Brisbane, exposing the taxpayer to risk”.

Principal of SGS Terry Rawnsley said a metro rail line along Parramatta Road between Westmead and Central would be a better fit for the city than a new motorway.

"It's the biggest transport project in Sydney's history and you want to be sure it is going to be an economically viable project. There's a lot of questions that someone needs to answer."
http://www.smh.com.au/nsw/nsw-state-election-2015/westconnex-the-wrong-project-for-sydney-report-says--invest-in-public-transport-instead-20150223-13m8f0.html#ixzz3ooycRRlG

I consider 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

It is reasonable for the Public to be very concerned about the financial viability of this project. Already the cost has blown out from $10 Billion to $16.8 Billion. It is apparent that the NSW Government is continuing to throw more and more money at the project, as traffic modelling continue to reveal that the project will not address Sydney’s congestion issues.

I reject the entire WestConnex project on the basis that the expected cost benefit ratio is less than the dollar and thus a waste of our NSW taxes.

15 Traffic Assessment

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 (area that is analysed) 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 (signals to regulate flow onto the ramps) 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.

16 Comments on specific sections

(The references here are to sections in Appendix G)

a) Appendix G, Section 3 Strategic Context 4.2.1

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); asingle 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.

b) Appendix G, Assessment methodology, 4.2.2

- 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. What toll prices have been assumed?
- The study 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.
- **Insufficient detail on the Value of Travel Time Saving (VTTS)/Willingness to Pay (WTP) model:**
    1. What are the form and parameters of the model?
    2. If it was based on stated preference surveys, then how has the issue of hypothetical bias been addressed?

3. Has the model been validated? Previous toll choice models in Australia have overestimated WTP for toll roads.
4. Does the model include the negative utility of the tunnel environment (monotony, no natural light, poor air quality)?
5. What value of WTP has been used in the WRTM?
6. What is the confidence interval around the WTP value used?
7. 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.

- **Why has the weekend period not been modelled, when current weekend traffic volumes are higher than weekday traffic volumes in some places?**
- **Insufficient information about the travel zone structure in the Westconnex Road Traffic Model (WRTM)**
    1. What are the travel zones based on? How big are they?
    2. How are intra-zonal trips modelled?
    3. How are trips to/from external zones modelled?

- **Induced demand has not been adequately addressed.**
    1. 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/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 my 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.

- **Insufficient detail on origin-destination demand matrix generation:**
    1. What are the form and parameters of the generalised cost function?
    2. How were shortest paths calculated?ion:
- **Insufficient detail on trip generation:**
    1. What are the form and parameters of the trip production function, and how was it estimated?
    2. What are the form and parameters of the trip attraction function, and how was it estimated?
    3. How were trip productions and trip attractions balanced?
- **Insufficient detail on trip distribution/modal split:**
    1. What are the form and parameters of the gravity model used?
    2. What are the form and parameters of the deterrence function used?
    3. How has modal split been estimated?
- **Insufficient detail on road traffic assignment:**
    1. Is assignment stochastic or deterministic?
    2. What link loading/flow function was used? What parameters were chosen?
    3. Were intersection delays included?

- **Insufficient detail on public transport assignment:**
    1. How were access and egress points determined?
    2. How were route strategies determined?

- **Non-motorised trips (pedestrians, cyclists) were not included in the WRTM or LinSig modelling. (**LinSig is a traffic modelling package for the assessment and design of traffic signal intersections, either individually or as a network that comprises of a number of intersections.**)**
- **Impacts on accessibility have not been modelled/assessed.**
    1. Most transport is not an end in itself – it is a means to access work, education, services etc. How does the project affect accessibility?

- **Equity and equality impacts not described.**
    1. How many people have better accessibility with the project?
    2. How many people have poorer accessibility with the project?
    3. Do benefits/impacts accrue to any population groups more than others, e.g., people with a disability or on low incomes?

- **Downs-Thomson Paradox is not considered (*Ed: According to the Downs-Thomson paradox, improved road capacity increases travel times because it attracts more users to the road and away from public transport.)***
    1. The project will attract passengers away from public transport to driving. 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.

- **No sensitivity analysis. (*Ed: The parameter values and assumptions of any model are subject to change and error. Sensitivity analysis , broadly defined, is the investigation of these potential changes and errors and their impacts on conclusions to be drawn from the model.)***
    1. 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?

c) Section 7 Assessment of construction impacts 4.2.3

- **Impacts on travel times for all modes (driving, public transport, walk and bicycle) have not been assessed/reported. The construction activities (*Ed: in some cases over three years*) will delay travellers in a number of ways:**
    1. Additional construction/workforce traffic.
    2. Temporary road and lane closures.
    3. Speed limit reductions.
    4. The 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. (*Ed: The M4 East construction period coincides would coincide with the New M5 project if approved)***

d) Section 8 Future conditions without the project

- **Has the impact that the forecast decreases in LoS will have on travel demand been fed back into the demand model? The decreases in LoS will reduce travel demand by influencing a number of long and short term travel choices:**

1. Home location choice;
2. Work location choice;
3. Destination choice;
4. Mode choice;
5. Departure time choice; and
6. Route choice.

As such, it is unlikely that the future 'do minimum' scenarios will be as bad as claimed. We know that congestion is self-limiting – as LoS declines, travellers will adjust their travel behaviour/choices to avoid congestion.

- **Tables 69, 70, 74, 75, 77 and 78 do not include the base year (2012) values, so the future 'do minimum' scenarios cannot be compared with current conditions.**

Table 79 WRTM screenline comparison between 2021 'without project' and 'with project' AWT volumes

Direction	Location	2021 'without project'	Share	2021 'with project'	Share	Change
Western Screenline						
Eastbound	Canterbury Road	23,643	22%	25,688	24%	9%
	M5 East Corridor (including M5 East Motorway and New M5)	57,764	54%	50,104	47%	-13%
	Stoney Creek Road	13,549	13%	19,230	18%	42%
	Forest Road / Queens Road	12,218	11%	12,108	11%	-1%
	Total	**107,174**		**107,129**		**0%**
Westbound	Canterbury Road	24,206	22%	25,895	24%	7%
	M5 East Corridor (including M5 East Motorway and New M5)	58,125	52%	48,424	45%	-17%
	Stoney Creek Road	13,496	12%	17,068	16%	26%
	Forest Road / Queens Road	16,513	15%	16,692	15%	1%
	Total	**112,340**		**108,079**		**-4%**

Ed: Where is the baeline? What are current conditions? Note also the shift in traffic to Stoney Creek Road that is already congested

- **Tables 72, 73 and 76 use 2014 as the base year, instead of 2012 as used elsewhere in the EIS. To understand the impacts of the project, a consistent baseline must to be used.**
- **An assessment of the impacts on walking and bicycle demand and travel times has not been provided.**

e) Section 9 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.

f) Section 10 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,

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/reported. Only performance measures for the immediate area around the St. Peters Interchange have been reported. Without this information, the
- An assessment of the impacts on walking and bicycle demand and travel times has not been provided.

References

1. Newman P, Kenworthy J. Costs of automobile dependence: global survey of cities. *Transp. Res. Rec. J. Transp. Res. Board* 1999;1670(1):17-26. doi:10.3141/1670-04.

16.1 Optimise user-pays contributions to support funding in a way that is affordable and equitable

16.1.1 Failure to meet this objective

WestConnex perpetuates car dependency.

I certainly do not have an issue with tolls or congestion taxes – but you must have a decent integrated public transport solution available first. Initiatives contained in the NSW Transport Master Plan (ignoring the retrofitted and contradictory westconnex) and Eco Transit Sydney would have enlivened the ability for people to get from A to B without via Central. Recent examples of the popularity of public transport – Gold Coast Tram. Green Square & Mascot stations once fares were reduced to standard and inner west light rail

WestConnex means that families in the West will need to find $100 - $200 per week to travel to work. Yet I – with public transport & Opal – pays $33.60 per week giving me free travel 3 days per week.

This is inequitable. Greater Sydney will continue to be in congestion – but now have to pay.

The New M5 means that our local roads will be awash with additional induced traffic, that are avoiding the tolls.

On this basis, I reject the entire WestConnex project in its entirety as it does not meet the objective of fair and reasonable access to transport for Greater Sydney.

16.2 Integrate with the preceding and proposed future stages of Westconnex, without creating significant impacts on the surrounding environment or duplicating any potential issues across the construction periods

16.2.1 Failure to meet this objective

There are large sections in our community that will endure up to 10 years of construction (destruction) in their community with 24/7 activity.

The EIS provides no mitigation or solution (apart from counselling).

10 years is a significant impact on a highly populated sections of the populace and should have been given greater weight for reasons not to proceed with WestConnex.

The myriad of road works – The Southern Gateway, Southern Extension, and complementary road works means our communities will endure long term construction for no benefits.

The lack of any evidence contained in the EIS on how this objective can be met, but anecdotal evidence proving otherwise, I therefore reject the WestConnex project in its entirety. This is a highly destructive and intrusive project for over one million people. That is not a 'few cracked eggs'

16.3 Protect natural and cultural resources and enhance the environment.

16.3.1 The WestConnex project does not meet this core objective

Features of the M5 East project include: Widening roads; unfiltered exhaust stacks close to homes, schools and aged care centres; destruction of trees; temporary and permanent loss of greenspace; induced traffic onto local roads; impact on wetlands, groundwater and endangered species; exposing residents to prolonged high impact acute noise 24/7; hundreds of significant truck movements a day impacting on the safety of residents particularly primary school children; isolation; community dislocation; car dependence.

None of these factors enhance the environment. In fact, this proposal has a very significant negative impact on the urban and natural environment where over a million people.

16.3.2 Sectional planning approach

I **object** to the sectional planning project approach to the 33 kilometre Westconnex motorway. This prevents serious consideration of the impacts of the larger Westconnex project. **While broad justifications for the whole project are used to justify local threats, there has been no overall analysis and evaluation of the environment threats from the whole project.**

16.3.3 Social Impacts

- Hundreds of homes 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.
- There is growing scientific evidence that excessive noise can damage short and long term health
- Road pollution is a significant contributor to overall pollution; living or working close to congested roads is a health risk; some roads that would be negatively affected by the Westconnex New M5 are already polluted.
- There is strong scientific evidence that air pollution, especially PM 2.5 and PM 10 are linked to increased risks lung disease, impaired lung development, strokes, cancer and other forms of respiratory illness.
- The EIS acknowledges that Stoney Creek Road, King Georges Road, Campbell Street Euston Road Alexandria and other roads will become more polluted. In some cases, air pollution is already at unhealthy level.
- Instead of tackling the issue of Sydney's pollution, the Baird government is planning tollway after tollway for Sydney. This will leave many people, especially those in Western Sydney, in a car dependent situation. This is unhealthy.
- Leightons/CIMIC, who have been awarded the contract before approval, decided that ventilation stacks should not be filtered although tollway projects in other countries have ventilation stacks which filter emissions. The EIS asserts that there will be very low ' negligible' emissions in local areas from the stacks. One reason engineers give for filtering tunnels is to protect residents in high buildings or land. In this project, some residents live on hills (Kingsgrove) and others (e.g. in Arncliffe) live in high buildings. There are experts who say that stack emissions are not safe and should be filtered.

- Increases in traffic will spill over into other roads and streets but because the traffic modelling only extends to two intersections past the boundaries of the Westconnex project, these increased levels have not been modelled or presented in the EIS.

As well, the assessment of air quality and noise impacts are completely dependent on the traffic modelling. The traffic impacts are uncertain and for this reason, **the air, noise, social impacts and health risk assessments cannot be regarded as reliable.**

Air concerns [redacted] protest at McCallums Hill Primary School about the WestConnex project. Picture: Chris Lane

These children will be exposed to elevated levels of dust and pollution at home and school. A construction zone a few metres from their home. Heavy truck movements past their school. Four trucks every minute during off-peak. And on completion, exposure to dangerous unfiltered exhaust from the chimney stack.

16.3.3.1 Home acquisitions

Home Owners (reported in the media) claim that lower than market value is offered for their homes and that they are bullied by RMS staff. Longstanding communities members are being forced to move far from their social networks.

Renters are also having to seek legal advice for relocation compensation. One long term renter in the same home for 18 years was only offered $5000 to relocate.

The disadvantaged residents in social housing (including independent homes for people with special needs) of RMS property have not had their needs addressed in the rush to evict hundreds of people from their homes.

Most of these people forced from their homes will likely find they have to move some distance away from where they have established support networks. This would be particularly hard on the frail and elderly.

I object to the mitigation of offer of 'counselling' which even if it does exist (and some say it has not been offered to them) would be of little assistance.

16.3.3.2 Unsafe Removal of Asbestos**.**

This dangerous substance has been located in several locations across the Westconnex project already. There is evidence that trucks removing asbestos have not been following appropriate safety standards such as sprinkler systems, washing down trucks before departure, and neglecting to properly cover loads.

I object to the contempt Westconnex has shown for the health and safety of residents within the locations and on route to Erskine Park where soil contaminated with asbestos has been dumped without being wetted or properly covered at the time of disposal.

The asbestos strongly suspected in the Earth Mound at Kingsgrove is a significant concern to all.

16.3.3.3 Divisive Infrastructure

I object to a 'solution' that results in a dreadful outcome on the amenity for all impacted suburbs. A wide, dirty and noisy toll road and the spaghetti interchanges thrust through suburbs that form part of Australia's 19th and 20th century history including the destruction of heritage listed homes and historic buildings.

16.3.3.4 Mental Health

The stress imposed on people by the Westconnex will increase the likelihood of anxiety and depression. The grief people will experience watching the suburb and urban landscape they love permanently destroyed has not been sufficiently addressed in the EIS social impact statement.

The permanent impact of this toll road on thousands of people's physical and mental health through

- visually divisive spaghetti interchanges
- noise barriers -that we know little care to landscaping for residents will be addressed –ref M5 KGR landscape design aka bare noise walls
- prominent and unfiltered exhaust stacks a constant reminder that residents and workers and their families are being poisoned by high levels of pollution
- loss of accessibility by pedestrians and cyclists
- impacts on the elderly for mobility, safety, connectivity and isolation
- impacts to the community and schools with the loss of neighbours
- impacts on the significant number of people forced to leave their home and community – loss of social networks and loss of school mates.
- stress and anxiety brought on by living in a permanent high noise and highly polluted environment.

16.3.3.5 Social Infrastructure

Stated mitigation - Landscaping treatments for the benefit of residents. Let's revisit the landscape design of the King Georges Road Interchange – hundreds of metres of bare noise walls because it is easier for the maintenance crew to inspect. Never mind the residents or professional pride or genuine appreciation for the huge disruption caused to residents. Ugly bare walls.

I object to the likely outcome facing residents of the landscaping treatments being a typical, visually divisive structure.

16.3.3.6 Loss of vegetation

I object to the loss of any vegetation planted as part of the rehabilitation/landscaping works following the construction of the Westconnex motorway. I have often been forced to travel on the M4 between the Sydney and the Blue Mountains. Over many years, I have watched side vegetation grow and provide visual relief, shade and refuge. I object to watching this vegetation being torn down, especially as once upon a time, the construction of the M4 motorway was then supposed to be the

answer to Sydney's east/west transport problems. I object that this existing motorway vegetation is seen to have no real value within the EIS.

I object to the destruction of significant tracts of parks and trees for the New M5.

I object to the impact upon the habitat of birds and animals which live, forage and shelter amongst the vegetation and trees to be lost due to the construction or operational needs of the project.

16.3.3.7 Car Dependence

Build a city for the people – and they will come. Build a city for cars – and congestion will prevail.

Ironically, it is these suburbs – targeted for destruction by Westconex – that demonstrates what the NSW Govt should be the planning for new outer suburb communities. The walkability factor - with ready public transport and local shopping centres. Local employment opportunities or employment centres (including high value jobs) within 60 minutes by public transport. Shared community spaces for gardening and leisure and social connectivity. Cultural and entertainment facilities for all ages.

The infrastructure planning for the new western suburbs, such as near Camden is woeful, with only 7% of Camden residents using public transport. Westconnex promotes socially isolating car dependence and the environmental impact of ever increasing traffic noise and air pollution – and does not provide residents of the western suburbs with any relief from congestion.

I object to this proposal as it is the wrong project for the wrong time.

16.3.3.8 Biodiversity and natural environment

Australia has the notorious distinction of having possibly the worst extinction record on earth according to Richard Kingsford, professor of environmental science at the University of NSW. This is predicted to continue without serious changes to the way we conserve our environment

16.3.3.9 Biodiversity effects are defined narrowly in focusing on potential impacts on Threatened Species.

Methodology and EIS statements re "the highly modified nature of the project footprint"

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.

The EIS field surveys (observations in the field) are very limited in duration and season (as usual in an EIS) – the "short duration of surveys" is acknowledged as well as **"it is possible that seasonal**

species were not identified"(20-3): for this EIS it was 1 day (12/2/15: no number of hours specified) and one night (27/2/15: also no duration specified) in one area (not specified where), with additional surveys on 12/3/15 and 26/6/15 "to investigate areas not covered by the previous surveys" (20-3). (It is not specified where if a physical location is referred to, nor whether it was day or night, and the duration).

Repeated sampling over some time period is really needed to develop anything representing a comprehensive survey. And if you are not (inclined to be) looking for it, you don't tend to find it, and if you are quite time limited as all EIS's are, you are falling well short of what is a satisfactory, let alone a rigorous survey process.

16.3.4 Endangered Fauna

16.3.4.1 Green and Golden Bell Frog

THE endangered Green and Golden Bell Frog is under threat as secret plans to build the WestConnex toll road through one of its last remaining habitats were quietly lodged to avoid public scrutiny.

The Green and Golden Bell Frog was once the most common frog species in the Sydney region but it now reduced to only two secure populations in the Sydney region – Kogarah and Homebush

The proposed development for WestConnex occupies the same area as the Green and Golden Bell Frogs on Kogarah Golf Course. Out of the seven locations where they 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. Further the only two locations that are not impacted only supported small numbers of frogs. 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.

Scientists are studying several species of Australian frogs - including the endangered green and golden bell frog - whose skin secretions are toxic to the multi-drug-resistant golden staph know as MRSA. The GGBF secretions may be the wonder drug of the 21st century. Yet, the overall WestConnex project will more than likely be responsible for the extinction of such an important species, as part of the M5 East section.

THE endangered Green and Golden Bell Frog is under threat as secret plans to build the WestCONnex toll road through one of its last remaining habitats were quietly lodged to avoid public scrutiny.

16.3.4.2 Rare Grey Headed Flying Fox

The EIS acknowledges that **Grey-headed Flying-foxes (GHFF)** use the area when foraging for food. An evening field study, consisting of two evenings only, confirmed this.

The project footprint is well within the nightly foraging range of the Clyde/Duck River camp, as well as other urban Sydney GHFF camps.
Urban GHFF camps have become important to the survival of the species which is now classed as Vulnerable under Federal and State legislation.
Neither street trees nor private garden trees have been included in loss of area calculation (see more on this below). Trees in these "unaccounted for" areas can be and are very important food resources for GHFF feeding.

This foraging habitat should have been quantified in their assessment and their conclusion re GHFF foraging habitat impact. As a result the area and significance of foraging habitat has been understated. On 20-16, the EIS states that "These planted trees do not constitute habitat critical to the survival of

the Grey-headed Flying-fox."

As there is currently no declaration by either the NSW or Federal Government as to what constitutes critical habitat this statement is disingenuous.

Stating under the heading Cumulative Impacts (20-20) that the combined Westconnex projects would result in "the removal of mainly planted vegetation and associated fauna habitats" (20-20) is not an adequate assessment of the whole Westconnex's project impact on Grey-headed Flying fox foraging habitat.

This species in its increasingly urban environment relies on much planted vegetation. Indeed the number of urban camps now in the Greater Sydney area is a result of the available food provided by such urban planted landscapes in proximity to camps – themselves also located in some cases amongst planted vegetation, especially as suitable habitat elsewhere in the species range has significantly contracted since European occupation (estimated at 50 % loss: Eby,P).

The whole Westconnex project – combined M4E and New M5 will impact on urban GHFF foraging habitat to a significant degree.

Grey Headed Flying Fox by Andrew Meares

16.3.4.3 Eastern Bentwing Bat

The impact on this species will be the loss of foraging habitat and the disturbance of roosting sites. Again, as similar to all of our native animals within Sydney metro, the significant and continued loss of vegetation will have a serious impact on these local communities.

16.3.4.4 Micro – bats (Large-footed Myotis and Eastern Bentwing Bat)

Given the very limited field surveys undertaken and poor quality recording of calls during these, the EIS cannot substantiate claims about the extent of use of existing infrastructure as roosting sites, nor claims about breeding habitat. The EIS claims there is no breeding habitat in the study area, but a breeding habitat can also include roof and wall cavities in the absence of tree hollows.

Nor is there substance to the claims about re-colonising new roosting sites eg. continuing to use culverts post construction disruption (20-16). There is no evidence quoted to indicate this will happen.

16.3.4.5 Statement that vegetation connectivity is limited

Some animal species manage quite well in small and fragmented patches, 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. Given the EIS has not quantified nor assessed the ecological role of private gardens and street plantings (see above), EIS comments about connectivity do not tell the whole story and so the potential connectivity (and ‘stepping stones’) that exist via this vegetation is ignored.

16.3.4.6 Cooks River Castlereagh Iron Bark bushland

Another cumulative impact on our natural environment, with the loss of a critically endangered stand, a development condition of the first M5, will be destroyed.

Threatened Flora - **Cooks River Clay Plain Scrub Forest**, located north of the M5 East Motorway, was significantly impacted by the original M5 construction. The remnant remaining is in good condition and is used by the Grey Headed Flying Foxes for foraging.

The Scientific Committee, established by the Threatened Species Conservation Act, had made a final determination to list the Cooks River Clay Plain Scrub Forest as an ENDANGERED ECOLOGICAL

COMMUNITY on Part 3 of Schedule 1 of the Act. Listing of Endangered Ecological Communities is provided for by Section 12 of the Act. (THREATENED SPECIES CONSERVATION ACT 1995 No 101)

Noted by the Scientific Committee that they are of the opinion that Cooks River/Castlereagh Ironbark Forest in the Sydney Basin Bioregion is likely to become extinct in nature in New South Wales unless the circumstances and factors threatening its survival or evolutionary development cease to operate and that the community is eligible for listing as an endangered ecological community.

The community had worked hard to save this from M5 version 1.

16.3.4.7 Rosecomb – at Wolli Bush found

Some months back, Fungi displaying a rare abnormality linked to vehicle pollution have been found near the existing M5 emission stack at Turrella.

Joanna Robinski of WCPS likens Rosecomb to a dead canary in a coalmine. "Finding Rosecomb is another wake-up call for local residents," she said. "Since 2012, when the World Health Organisation upgraded the status of diesel fumes to the highest level of human carcinogenicity, we've had confirmation of the ill-effects of pollution. This provides further evidence that living alongside emission stacks negatively impacts the biota of our environment as well."

The abnormal fungi – found only near the stack – needs further assessing.

16.3.4.8 Ramsar Wetlands

Wetlands provide significant economic, social and cultural benefits. They are important for primary products such as pastures, timber and fish and support recreational and tourist activities. Wetlands also help reduce the impacts from storm damage and flooding, maintain good water quality in rivers, recharge groundwater, store carbon, help stabilise climatic conditions and control pests. They are also important sites for biodiversity.

Wetlands cover about 9% of the earth's surface and are estimated to contain around 35% of global terrestrial carbon. Wetlands act as sinks for carbon dioxide and other greenhouse gases, especially if their vegetation is protected and their natural processes are maintained.

Without biodiversity the variety of all life forms, local ecosystems and in turn, human societies, cannot survive. Although highly urbanised, the City has retained several small **bushland** and **wetland** areas which play an important role in terms of providing food, habitat and shelter for native animals. These areas are deemed to have 'conservation value' (meaning they are worth preserving for future generations) because they represent ecosystems that would otherwise be lost.

The proposed F6 extension (which is referred to as a given in the EIS although it is not even in early stages of planning) will likely also impact on the Rockdale wetlands – another significant loss to our natural and human environment.

I object to the sectional approach taken to the Westconnex project which makes it difficult to properly assess the cumulative impact on our wetlands across both Westconnex and Southern Extension

I object to the unwarranted destruction of what remains of our natural environment for a project which is managed by politicians and business people who continue to hide the business case on which it is based. Westconnex managers have been unable to properly debate or refute the many informed critiques of the project.

16.3.4.9 Conclusion

In an age of shrinking backyards and an ever-increasing urbanised metropolis these remnants of natural spaces and parks are much more than sanctuaries for our native wildlife and remnant flora -

they are places for individuals, families and groups to play, relax and to simply enjoy the wildlife and flora that exist in these spaces. These places have important cultural and social significance, and they need our protection. Climate change, greenhouse gas emissions and noise pollution further strengthen the argument that building more motorways is not the right direction to take.

Our aim is to give our natural spaces a voice, and to lobby State, Federal and Local governments to protect them for wildlife, for our community and for future generations, and to propose sustainable transport options rather than freeways.

Is the cost and destruction to endangered fauna and flora, hectares of parks, air quality and loss of many homes and businesses worth a one kilometre per hour speed increase (source KGR M5 eis pg 'v')?

16.3.5 Flooding

During construction, there is the potential for local catchment runoff to enter project excavations at the interchange locations and impact the construction ancillary facilities. Construction activities also have the potential to exacerbate flooding conditions in adjacent developments. The mitigation stated are physical barriers designed to protect the works areas and tunnel entries so as not to increase flooding conditions in adjacent areas. The public needs full independent advice on the safety of the tunnels which is not possible in the short period allowed for consultation.

16.3.6 Urban Salinity

I am concerned about the potential for salinity damage that can shorten the life of urban infrastructure such as roads, buildings, water and sewage pipes. This leads to costly maintenance and repair by homeowners and councils.

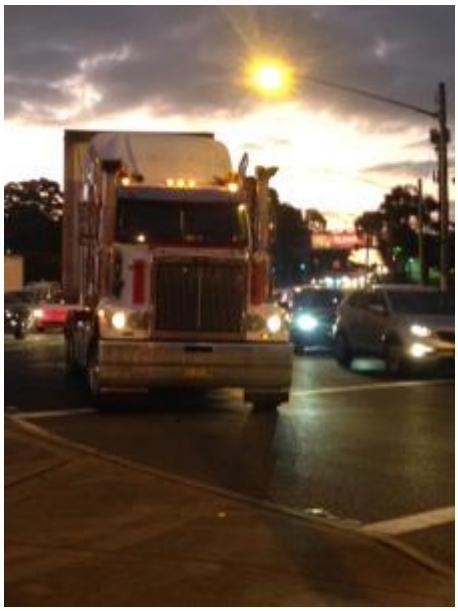
The movement of excess water and salt in parks and gardens can affect plant growth and cause plant death. Sports grounds and recreation areas affected by urban salinity may become bare, unattractive and unusable. Soil properties can be altered significantly making it hard to revegetate these areas.

Pockets of native vegetation in and around urban landscapes may also be affected. This can have serious consequences including the disappearance of native flora and fauna and poor downstream water quality.

I am concerned about the impact of groundwater and the potential for increased risk of flooding due to the reduction of greenspace.

The public needs access to more independent technical information so that they can understand the true impacts of the project.

I conclude that Westconnex comprehensively fails one of its claimed core objectives - *'Protect natural and cultural resources and enhance the environment'* is not met by the Westconnex project.



Residents studying the EIS while questioning the legality of early drilling in Haberfield

17 The project represents lost opportunity for better transport investment

As mentioned earlier, it is a tragedy for Sydney and NSW that the rational initiatives put forward by Ms Berejilian in the NSW Transport Master plan have been cast aside for this flawed project.

Alternatives that would have been regarded as long term assets as put forward by EcoTransit in their recent newspaper :

- Parramatta – focused light rail network.
- Modernise rail signaling to increase increase capacity
- East – West Translink – extending light rail network from Dulwich Hill through to the Airpor using unused rail space
- Kinsgrove "Last chance" Park & Ride
- Retrofit two extra stations at Airport Line
- Buyback the Airport line and reduce train fares to standard rates at the Airport stations and also removing the anti-competition clause
- Sydney-Newcastle rail line upgrade (stage 1)
- Parramatta Road Light Rail (CBD to Olympic Park)
- White Bay GreenLink
- Cycling storage at selected stations to complement a rail and ride concept
- More rail capacity and frequent services for the Western Sydney Rail Line

- Pippita Express Solution using spare rail space

The combined cost of all of these projects come in significantly less than $15 billion and would make a genuine dent in the problem of road congestion. These projects particularly would soak up much of the single passenger vehicles off the M5 and M5, clearing the road significantly for tradies and freight.

The science is clear – **Faster road network speed depends on faster public transport**. Take for example the recently built Gold Coast Tram. Patronage on the tram was delightfully beyond expectations. As a result, the performance of the parallel Gold Coast Hwy also significantly improved.

This is genuinely a tragedy to Sydney and NSW, particularly taking into account the WDA boast contained the King Georges Road M5 interchange (page v in volume 1) that "Sydney's network will improve by one kmph on completion of the entire project". Wow. Or more to the point, rather an underwhelming outcome.

I therefore reject the WestConnex project in its entirety, as it represents a tragic loss to the people of NSW in honestly addressing the congestion issues of Sydney.

18 The project fails justification that it is in the best interests for the public

I reject the WestConnex project in its entirety, as public health and wellbeing has been completely disregarded. This is a huge gamble on people's health, and the future funds to cover medical costs.

18.1 Health Impacts Summary

- This Human Health Risk Assessment is not accepted as a reliable study of the health risks of the WestConnex project
- This assessment has several serious flaws, but the key one is that it is not independent. It relies completely on the findings of the Air Quality Impact Assessment (Volume 2B, Appendix H), which in turn relies on the WRTM traffic forecast model. It does not question, in any way, the findings of the Air Quality Impact Assessment, thus does not assess the health risks of the very real potential for induced demand on Parramatta Road.
- Both NO2 and PM2.5 levels are already elevated and above guidelines in many of the localities within the project area, so any additional traffic due to induced demand (in tunnels or on surface roads) will add to this situation.

- This risk assessment does not point out that the air quality standards or guidelines used in the EIS may be superseded by stricter ones at the end of 2015 when the new National Environment Protection (Ambient Air Quality) Measure (NEPM) standards are passed
- A truly independent health risk assessment would have concluded that peoples' health was already being compromised in this corridor, and that further "hot spots" are going to be created by the project and that the relevant government authorities should be taking action about it, including by urgently implementing the National Clean Air Agreement.
- Other cleaner forms of transport are required in this corridor.
- Diesel fuel vehicles need to be phased out quickly, as is happening in France and proposed in other parts of Europe.

18.2 The Westconnex/AECOM Human Health Risk Assessment reaches the following overall conclusions

- The tunnel doesn't need filtration as there will be negligible pollution at the portals and the ventilation stack will disperse pollutants across the air-shed with negligible effect on local residents
- A detailed assessment of two key pollutants (nitrogen dioxide – NO2 – and particulate matter measured in microns – PM10, PM2.5) is required, given their known associated health effects and the impacts of their co-exposure (common in urban environments) and the known main source of PM2.5 (and finer) in the urban environment being vehicle diesel exhaust
- Potential health impacts associated with changes in air quality (specifically NO2 and PM) within the local community was assessed as low and essentially negligible
- There are some residents who will have an increased exposure to PM as a result of the redistribution of emissions from surface roads
- There are some residents who will be exposed to less PM2.5 as a result of the project
- Summary of mortality data for three key factors (COPD, lung cancer, cardiovascular disease) indicates that Sydney Area Health Service has rates higher than the average NSW rate for all three indicators; summary of hospitalisation data for key factors (asthma, cardiovascular disease, COPD) shows asthma rates similar to NSW and cardiovascular disease and COPD less than NSW rates (possibly accounted for by high GP service level in Inner Sydney)
- Increases in population (and its distribution) of the suburbs within the project footprint will have no impact on the health outcomes

- The time spent exposed to pollutants within the tunnel is very short (minutes) and in the absence of published guidelines for NO2 and PM within tunnels, advises keeping vehicle windows up and air con on recirculation setting
- Potential for noise and vibration impacts during construction could result in adverse health effects so management and mitigation plan required for health effects
- After construction, some properties will have elevated road noise so mitigation measures are required
- In such a complex project, there are inherent uncertainties in each of the methods used to estimate emissions and concentrations, and there are limits to how accurately any impacts in future years can be predicted

18.3 Summary of key air quality issues accepted by the Health Risk Assessment

- By 2021, without the project, the maximum (residential and commercial) 1-hour concentration of NO2 estimated to be (in micrograms per cubic metre) 375ug/m3 and 360ug/m3 (respectively) – which is well above the guideline (of 246ug/m3); with the project completion, the levels estimated as 307ug/m3 and 286ug/m3 (respectively) – still well above the guideline.
- By 2021, with the project, the cumulative (maximum annual average, rather than acute) NO2 concentrations estimated to be below the guideline of 62ug/m3
- By 2031, with the project, cumulative NO2 concentrations estimated below the guideline of 62 ug/m3
- By 2021, without the project, the maximum (residential and commercial) 24-hr average concentration of PM2.5 estimated to be 29.3 ug/m3 and 30.5ug/m3 (respectively) – which is significantly above the guideline (25ug/m3); with the project completion, the levels estimated as 28.2ug/m3 and 26.6ug/m3 (respectively) – still above the guideline
- By 2031,with the project, PM2.5 levels estimated as above the guideline
- By 2021, without the project, the maximum (residential and commercial) 24-hr average PM10 concentration estimated as 54ug/m3 and 55.4ug/m3 (respectively) – above the current guideline (50ug/m3) and well above the recommended (from the 2014/15 review) of 40-50ug/m3

- By 2021, with the project, the maximum (residential and commercial) 24-hr average PM10 concentration estimated as 52 ug/m3 and 50ug/m3 (respectively) – above both the current guideline and recommended (review) guideline
- By 2031, both without and with the project, PM10 will be above both guidelines
- Community locations most at risk by 2031 of mortality, cardiovascular and respiratory illness from increases in PM2.5 concentrations are: **Homebush Boys High School, Ella Community Child Care Centre.St Joan Of Arc Catholic School, Dobroyd Point Public School, Woodfield Aged Care Centre**

18.4 Methodology of the Health Risk Assessment

The Risk Assessment relies on key aspects of the Air Quality Impact Assessment including:

- The tunnel design claim that there will be negligible impact at sites of portals and ventilation stacks
- The findings of the air quality report within this EIS, which relies heavily on the air quality data from the 3 OEH monitoring stations at Rozelle, Chullora and Earlwood, one of which, Rozelle, does not monitor PM2.5
- Traffic estimates within this EIS (which in turn rely on the population estimates).

For the health indicators, it relies on:

- data that is five (5) years old for the key health indicators
- hospitalisation data only for respiratory indicators,and *has not included any GP data relating to consultations*.

It does not include the demolition of buildings (houses and commercial) in the risks associated with the project, even though a high proportion of pre-1980's buildings could have some asbestos on the sites.

18.5 Flaws in the Health Risk Assessment Methodology

- It accepts the claim that the tunnel design is "state of the art", and doesn't canvass options to filter using actual "state of the art" like the Hong Kong Wanchai By-Pass tunnel and Madrid (Spain) M30 Ring-Road.
- Residents at the Kingsgrove RSL (no) information session were advised by the Tunnel Ventilation representative that the Hong Kong tunnel is filtered due to the proximity of 25

story apartment buildings. This admission by WDA staff proves that Sydney is receiving a cheap 'ventilation' solution despite a similar situation to Hong Kong

  - Arncliffe has existing high rise and more planned
  - McCallums Primary (on a hill) is located very close upwind from the Kingsgrove business park poison stack located in a valley.

- It accepts a tunnel design that infers there will be no pollution at tunnel entry or exit ramps, with the speed into entrance ramps relying on the "piston effect" to pull vehicle emissions into the tunnel and into the ventilation stack. A close questioning of the "experts" (at a number of the WDA consultations) about tunnel exit ramps where they hit Parramatta Rd and West City Link, found they agreed that **there would be pollution in the vicinity of ramps if traffic hits congestion on exiting, and the same would be true for queuing traffic to enter tunnels. Thus their definition of "portals" is strictly that entry/exit area within the tunnel, not leading into or out-of the tunnels.** An independent risk assessment would have noted the possibility of build-up of pollution around these portal sites and the consequent health impacts. Kingsgrove, Bexley North, Arncliffe and St Peters have portals thus adding to the polution issue.
- An AMA submission into air quality states that the current air quality monitoring system in Australia does not adequately capture data relating to the exposure of vulnerable groups; and information on the levels that specific communities are exposed to, and the subsequent risk, is often unknown; the AMA believes the current monitoring system is only capturing data that represents exposure of the broader population, not people at "hot spots" – these "hot spots" would include the large number of residential and commercial properties within 300 metres of major roads (Australian Medical Association (March 2013), Submission to the Senate Standing Committee on Community Affairs, Inquiry into the impacts on health of air quality in Australia, p7). The Human Health Risk Assessment itself indicates there are 10,000 residences and commercial units (which includes multiple apartment blocks) within the affected zone. A conservative estimation of this population would be 40,000 people who may already be living in "hot spots".
- the data collected at the four (4) roadside air quality monitoring stations can be supplemented by similar data from the Lane Cove study (Cowie et al, 2012) collected at Parramatta Road Camperdown in 2006-2008, which indicated highly elevated levels of NO2 and PM2.5. The traffic count (2005) at the Camperdown (control) site in that study was 65,000 vehicles/day, which is a little fewer than the City-West Link count of 69,000 vehicles/day and higher than Parramatta Road (at Dalhousie St Haberfield) of 54,000 vehicles/day (NSW RMS Average

Daily Traffic 2012). All this data shows that levels are already higher than the guidelines, which themselves have been questioned by the AMA and several other groups in their submissions to the Senate Standing Committee On Community Affairs Inquiry Into The impacts On Health Of Air Quality In Australia.

- It should have noted that the new national air quality standards to be endorsed at the end of 2015, well before the project starts, may include higher standards for PM10 than are used in this EIS. The outcome could be many more "hot spots" than acknowledged in the Air Quality Impact Assessment.
- The study should have noted that several international studies have shown the adverse health effects of living less than 500 metres from major roads. In one longitudinal study of 2,300 children in Los Angeles, Guaderman et al found that improvements in the air quality (particularly PM2.5 and NO2) over several years had dramatically improved the lung function of children living less than 500 metres from major roads (Gauderman WJ, Urman R, Avol E, Berhane K, McConnell R, Rappaport E, Chang R, Lurmann F, Gilliland F.2015. Association of improved air quality with lung development in children. N Engl J Med. 372(10):905-913). A paper that calculates the medical costs of air pollution indicates that even the NEPM standards give a false sense of "safe" levels of pollution. This report states that as average levels of air pollution increase so do the average adverse health effects and that in fact there is no safe threshold. The paper claims that proper cost benefit analyses should be undertaken to accurately quantify adverse health effects due to both local and general increases in air pollution (Barnett, A, 2014 "It's safe to say there is no safe level of air pollution" Australian and New Zealand Journal of Public Health 2014 vol. 38 no. 5). The health risk assessment does not acknowledge any critique of what is considered a safe threshold because it completely accepts the assumptions of the Air Quality Impact Assessment. Available evidence doesn't indicate there is an exposure threshold for PM below which health effects do not occur; thus this risk assessment should have erred on the side of caution.
- The study should have noted the large number of people living, working and schooling less than 500 metres from the M5, King Georges Road and Stoney Creek Road are at an already elevated risk of health damage; it also should have noted the increased risk if this corridor does not have the reduced traffic volume estimated by the WRTM, given the additional sources from the tunnel traffic.
- A scenario including all risk factors for 2031 should have been discussed – that of increased traffic on the surface of Parramatta Road the full length of the project. The concept of 'induced traffic demand' is a real one and has not been taken into account by this health risk

assessment. A meta-analysis of induced demand (Cervero, R, 2001, Induced Demand: An Urban and Metropolitan Perspective, Paper prepared for Policy Forum, US Environmental Protection Agency) concluded that, whilst there were a range of elasticities associated with increased demand with new road infrastructure, the phenomenon should not be trivialised

- The study ignores the possible contribution of the project to the estimated health costs of the Sydney region. In 2005 in Sydney motor vehicle pollution alone accounted for $1.5b in health costs (Australian Bureau of Transport and Regional Economics, 2005, cited in Senate Standing Committee On Community Affairs Inquiry Into The impacts On Health Of Air Quality In Australia, NSW Environment Protection Authority Submission, September 2013, p15). As this report states … "particle pollution is the driver for the high public health costs of air pollution" (ibid).
- The mortality data for three key factors (COPD, lung cancer, cardiovascular disease) shows that Sydney Area Health Service has rates higher than the average NSW rate for all three indicators, yet this risk assessment does not question whether exposure to already elevated levels of NO2 and PM2.5 may be a cause of these elevated rates.
- The reliance on five years old data for the key health indicators is problematic, given background sources of key pollutants (NO2 and PM2.5 and PM10) have increased in that five year period, as evidenced by vehicle fleet data. According to the Sydney Morning Herald (March 15-16 2014) the number of diesel vehicles on the road in Australia has more than doubled since 2005. ABS data shows that in 2015 there are 3.6 million diesel powered vehicles, accounting for 19.7% of the fleet; and over the five year period from 2010, the number of Passenger vehicles and Light Commercial vehicles registered with diesel fuel increased by 96.4% and 62.9% respectively (ABS, Motor Vehicle Census, Australia, cat no 9309.0). This increase in diesel fuel use would have had both short term and longer term impacts on health in the period since this health data was published and has not been captured by it, nor has this health risk assessment mentioned increased risks from the growing diesel fleet. The other concern with growth of the diesel fleet relates to car manufacturers using software called "defeat devices" that allows the masking of exhaust emissions in pollution control tests. Recent revelations (eg SMH, Sep 23 2015) of such corruption by what was thought of as a "good corporate citizen" – the Volkswagen company – indicates the distinct possibility that other manufacturers may be doing the same. If the environmental protection laws are being flouted by many diesel fuel vehicle makers, then the claim by this EIS that tougher laws are making the Australian vehicle fleet (and therefore the air) cleaner is

questionable. The best option for any government keen to improve air quality in polluted parts of Sydney would be to quickly phase out diesel vehicles.

- Hospitalisation data for respiratory indicators should have been supplemented by GP survey data (given Medicare does not collect this level of data), collected by the relevant Local Health Districts.
- Sydney Area Health Service collects data on health risk factors, published for each Local Health District. The risk factor model is one that can be called a "personal behaviour" model. It includes risky alcohol drinking, smoking, consumption of fruit & vegetables, being overweight or obese, and adequate physical activity). It does not include external risk factors, like living within a few hundred metres of a busy road. The fact that the Area Health Services in NSW do not collect data for external risk factors, although they are known (e.g. exposure to coal dust (mainly PM10) and road pollution (notably NO2 and PM2.5) means that more meaningful data is not available to these types of Human Health Risk Assessments.
- The health impacts from noise and vibration seem to be underestimated by this health risk assessment. The writer should have conducted an independent analysis of that assessment, rather than relying on its findings. A independent review of the noise and vibration section of the EIS (which will be published by the People's EIS soon) raises uncertainty in a range of areas of the noise and vibration assessment. It states that, given the number of potentially impacted properties and people within the project area, further work needs to be done to ensure the local community and other affected stakeholders are provided with a fully informed assessment. This needs to 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 which does provide for any further input from the community.
- The health risk assessment should have included a risk assessment for asbestos and a management plan for mitigating risks, given serious community concern has been expressed over issues with asbestos removal and treatment at Granville (M4 widening stage) and at Alexandria (M5E stage).
- It is common practice in health research (including health risk assessments) to identify and analyse any related health studies to understand their the implications for the project being assessed-in this case the WestConnex project.Two such studies have been conducted on the Lane Cove Tunnel and on the M5East tunnel. The risk assessment ignored the 'fine print' findings of both of these studies. The Lane Cove study was of the short-term respiratory (asthma-like symptoms) health effects of exposure to emissions from the tunnel stack. The study was conducted 2006-2008, with thirty six (36) participants originally, falling to twenty

(20) by 2008. This is a very small cohort from which to draw any strong conclusions. The "control site" was Parramatta Road, Camperdown. The main conclusion was that residents near the eastern tunnel stack reported increased symptoms (even though there were no increases in pollutants) and this could be accounted for by other sources of pollution not measured in the study (e.g. particles smaller than PM2.5 and/or volatile compounds) or other unknown sources. The study also found significant adverse effects of increased airway inflammation, and chest and eye symptoms associated with exposure along Parramatta Road Camperdown after only 2-hour exposure periods. The authors recommended a follow-up study to better understand the effects of the ventilation stack. (Christine T Cowie et al, 2012, 'A randomised cross-over cohort study of exposure to emissions from a road tunnel ventilation stack', BMJ Open 2012;2). No further studies have been conducted.

- In the study of the pollution effects of the M5 East tunnel (NSW Health, 2012), it was stated that the ventilation stack was an important source of air pollution in the area within a 2 km radius, contributing 23% of NOx and 17% of PM10. The study's aim was to consider cancer incidence in the vicinity of the tunnel stack. Whilst it found there was a significantly higher incidence of lung cancer in postcodes immediately around the stack, the study concluded that it was unlikely there was a causal link. However, the study did qualify its overall conclusions with the comment that the descriptive epidemiological method used in the study was a relatively weak tool to resolve the type of issues under investigation. The study methodology was unable to discern the types of lung cancers screened in the area (smokers vs non-smokers). The study's argument was that, given lung cancers can take a number of years to become apparent, the higher incidence recorded after the opening of the tunnel may not have been connected to the stack emissions. The study concluded that the higher incidence of lung cancer probably pre-dated the locating of the stack in that area. This is an alarming finding, given that the cancer registry data would have been available to NSW Health, Department of Main Roads and the other bodies responsible for the EIS prior to the building of the M5East. So it would appear that an area of Sydney which already had an elevated incidence of lung cancer was chosen as the site of the M5East ventilation stack, when health research was already indicating the causal link between particulate matter and lung cancer. Given that mortality data for three key factors (COPD, lung cancer, cardiovascular disease) indicates that Sydney Area Health Service has rates higher than the average NSW rate for all three, is it possible that this project is again ignoring the potential health impacts of a project that independent experts predict will increase total traffic pollution over time.

18.6 Flaws in the assumptions on which EIS health findings are based

- The health risk assessment does not take into account the possibility of total higher traffic along our local roads . An Australian Government Department of Infrastructure and Transport Research (2012) report into traffic growth in Australia shows that traffic per person in Australia has grown steadily between 1965 and 2011. The measure of traffic volume (number of vehicles x distance travelled = vkt) in all states and major cities for this period indicates that the pattern of increases has been consistent, with only minor changes in response to petrol price rises, unemployment and the global financial crisis. Forecasts of future growth in traffic volumes indicate that traffic in Australia will rise from 55 billion vkt per quarter in 2011 to more than 65 billion vkt per quarter in 2020.

19 The project fails in applying an appropriate solution to a 21st century problem of congestion

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.

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:

(a) 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 (1)

(b) Serious human health impacts due to petrochemical vehicle emissions/smog, including:

i) Lung cancer,

ii) Asthma,

iii) Heart disease,

iv) Impaired lung development in children living near motorways/exhaust stacks.

(c) Waterways contaminated with road runoff (heavy metals and carcinogens in brake and clutch dust, exhaust particulates etc.).

(d) High traffic crash costs (of deaths/traumatic injuries and material damage).

(e) Urban sprawl and increasing commuting distances.

(f) Social isolation for non-drivers living in car-dependent suburbs.

(g) Noise pollution from traffic and its impacts on sleep.

(h) Impacts on visual amenity (pollution stacks, concrete interchanges, concrete flyovers).

(i) Extreme summer temperatures (urban heat island effect).

(j) Community destruction and severance.

(k) Destruction of heritage.

(l) Less incidental physical activity from walking and cycling (including to/from public transport), resulting in higher rates of obesity, diabetes, cancer and heart disease.

(m) Increased chauffeuring burdens for parents and carers.)

(n) Less independence for children.

(o) High per-capita greenhouse gas emissions.

20 The project contributes to carbon emissions

A shift from car-centric transport to one based on public transport, walking and cycling can reduce carbon dioxide emissions by 40%, according to a report by the Institute for Transportation and Development Policy and University of California.

"Transportation, driven by rapid growth in car use, has been the fastest growing source of CO2 in the world, said Michael Replogle, ITDP's managing director for policy and co-author of the report. "An affordable but largely overlooked way to cut that pollution is to give people clean options to use

public transportation, walking and cycling, expanding mobility options especially for the poor and curbing air pollution from traffic."

"The analysis shows that getting away from car-centric development will cut urban CO2 dramatically and also reduce costs, especially in rapidly expanding economies," said report co-author Lew Fulton, co-director of NextSTEPS Program at the Institute of Transportation Studies at UC Davis. "It is also critical to reduce the energy use and carbon emissions of all vehicles."

Given that climate change is real, and every county must endeavour to reduce emissions significantly, the WestConnex project is not best practice. I therefore reject this project in its entirety.

This 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 on Parramatta Road than predicted) of increasing these levels across the Corridor. Accordingly, I strongly object to the entire WestConnex project.

20.1 Strategies to manage climate change risks put off to "detailed planning" stage

The Climate Change Risk Assessment portion of the M5 EIS conjures an image of a durable roadway system withstanding the tests of a changing climate. While the document incorporates climate change into the risk profile of the project, it ultimately recommends very

little in the way of direct risk management strategies other than the "consideration" of various potential risks in the next phase of the design process and a few non-binding suggestions as to what these design adaptations might look like (see pages Chapter 25-9 & 25-10).

The calculation of a Greenhouse Gas saving is based on three basic deceits: 1) it conceals the predicted actual change in GHG emission (27% increase over 10 years); 2) there is a huge underestimation of the induced travel effect); and 3) the comparison with a do-minimum scenario is a false comparison.

1. **Actual 27% increase in emissions.** The modelling predicts an actual 27% increase in GHG emissions between 2021 and 2031 with the project (though there are no statistics to compare with current emissions). This is completely incompatible with Australia's commitment to reduce GHG emissions by 28% by 2030 or with the agreements reached at the Paris Conference to be carbon neutral by 2050. We need to be moving rapidly to reduce road travel which is inefficient. For example, road haulage emits three times more GHG than rail for the same tonnage. The presentation of the EIS, focussing on the purported saving compared to a do-minimum scenario is deeply dishonest in that it conceals the dramatic increase in emissions that will occur under this project, as well as under the do-minimum scenario.
2. **False comparison.** The EIS compares GhG emissions from traffic to a scenario without major road works. Considering that billions of dollars of public money is being spent on the project, the proper comparison should be with one where that money is invested in an alternative project that delivers a reduction in road use (and hence emissions). The predictions assume that road traffic will be about 107,000 journeys per day in each direction in 2021 and 130,000 by 2031. As an alternative, a bi-directional light or heavy rail line could reduce this by as much as 40%, providing a much larger reduction in GhG emissions.
3. **Induced travel.** There is a basic understanding in transport economics that if you add capacity on a congested road network, the number of vehicles using the network will increase until the congestion returns. While the EIS acknowledges such an "induced travel" effect, there is no explanation in the 258 page transport report about what assumptions were used. The report seems to have hugely underestimated the effect, as can be seen in some of the predicted traffic volumes. For example, it predicts if that all of Westconnex is built, traffic flows in the project area will be reduced by 10% and

on the Pacific Highway around the Cook River by 70% compared to the do-nothing scenario. This conclusion must be based on some childishly naive assumptions. In reality, users of these roads will adjust to any new ease of movement by increasing journeys. The main reason that the EIS predicts a reduction in GHG emissions is that there will be less congestion, based on these predictions of relatively low-flow. But, if the full effect of induced travel is taken into account, the level of congestion will be the same in 2031 as it is now, and there will be more vehicles affected. Thus, instead of a decrease of 2.9% compared to the do-nothing scenario, a 20-30% increase is more likely.

21 . National Trust Conclusions

The National Trust noted in their M4 East submission that this M4 East is only one section of the WestConnex Motorway and that **there will be additional heritage impacts relating to the St Peters Interchange and the future link between Haberfield and St Peters.**

The heritage impacts of the WestConnex Motorway are severe. The public must question whether the financial commitment for the total project in today's dollars of $16.8 billion (inevitably set to rise) would be much better allocated to public transport.

Back in the 1970's – workers refused to demolish 'those old buildings at the Rocks'. These historic buildings are an icon and asset to our Sydney. It is the same with the inner suburbs across the 33km. this is our history. It is gobsmacking that WestConnex project has been proposed with such a significant loss as a result.

I agree with The National Trust in their objection to the WestConnex M4 East proposal because of its severe impact on Listed Heritage Items and Heritage Conservation Areas and because it diverts 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.

21.1 Alexandra Canal – heritage importance

The Alexandra Canal is also at risk by the WestConnex project – yet another piece of our history likely to be destroyed.

Alexandra Canal is of high historic, aesthetic and technical/research significance. Historically, it is a rare example of 19th century navigational canal construction in Australia, being one of only two purpose built canals in the State, with one other known example in Victoria. It has the ability to demonstrate the NSW Governments initiative to create water transport as a means of developing an industrial complex in the Alexandria and Botany areas and exploiting the use of unemployed labour to achieve its scheme.

It played a seminal role in the changing pattern and evolution of the occupation and industrial uses of the local area and nearby suburbs, which included filling large areas of low lying land for development.

Aesthetically, intact original sections of the canal, comprising pitched dry packed ashlar sandstone, provides a textured and coloured finish which is aesthetically valuable in the cultural landscape. It is a major landmark and dramatic component of the industrial landscape of the area, particularly as viewed from the Ricketty Street Bridge and along Airport Drive.

Scientifically, the excavation of the canal provided a valuable contribution to the understanding of the changing sea-levels along the eastern seaboard and the antiquity of the aboriginal presence in the area. Intact original sections of the fascine dyke sandstone construction are rare examples of late 19th century coastal engineering works.

I object to the WestConnex project in its entirety, due to the destruction of our heritage for what is a wasteful project that fails to achieve any of its stated objectives.

22 People's stories

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.

22.1 Willows Nursing Home

According to the GHD EIS Social Impact report, at least five aged care facilities including hundreds of beds lie near the path of the M5 East.

Residents of aged care facilities or their families try to choose the best environment for their final home. High on their list of physical priorities are peace and quiet, a bright outlook and easy access for visitors.

Aged care facilities are both a home for residents and a business. While the EIS economic impact statement did not conduct any consultations with other businesses, 'social infrastructure' organisations such as churches, schools and health care facilities were asked for feedback and nearly all told Westconnex of their concerns.

The Willows Nursing Home was no exception. The GHD report records its many objections including noise, pollution and dust and anxiety about how visitors and staff would access the home both during construction and afterwards.

This is because if the M5 East was to proceed along the planned route, Willows Nursing Home would literally be in the middle of a construction zone and later next to the tunnel exit and unfiltered ventilation stack.

I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.

22.2 People's EIS interview with Sass Inbari.

Sass Inbari has owned Willows Private Nursing Home on Orpington Road, in Ashfield, since 1977. It was his father's before that and Sass built it up from 27 beds to 40. The home provides high care support to its elderly residents, and welcomes visitors from 8.00 am to 8.00 pm daily.

The Westconnex GHD social impact study notes that as a high care residential facility "the impacts of vibration and noise could be detrimental to health and wellbeing of residents."

Sass is concerned about the noise and dust occasioned by the demolition of the buildings immediately behind and next to the nursing home. Later there would be more disruption when this emptied space would be occupied as a construction site for the motorway and a parking lot for hundreds of large diesel trucks that will move in and out of the site each day.

The residents at the Nursing Home are frail and vulnerable. Staff are also upset and it will be a major inconvenience with road closures and works for relatives coming to visit, ambulances, delivery etc.

Bus stops on Parramatta Road are going to be moved, which means it will be harder for relatives to visit the residents.

Sass first heard about the Westconnex motorway on the news like everyone else, then about 3 or 4 months ago he got a visit from Westconnex representatives to discuss his concerns. "They took it all on board but I have not heard from them since," says Sass.

He wants compensation because of the impacts of the construction and of the operation of the motorway, and he is worried he is going to loose business.

He is angry too as he says he doesn't "know what good the Westconnex is going to do. All it will do is just shift the bottle neck towards the city."

He doesn't think people realise what impact the motorway will have.

All the other businesses around him, on Paramatta Road, have been purchased. Sass doesn't wish to be purchased, only compensated. He is stressed and frustrated as he feels there is nothing he can do to change the situation

I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.

22.3 This is the story of Kevin

22.4 Impact on Residents by Westconnex

WestConnex was required to include a social impact study in the EIS. This is Appendix M. The NSW Planning Department required that this section of the EIS should report on the impact of the M5 East on communities from planning through to operation of the WestConnex. GHD was hired to work alongside AECOM to produce the social impact study. According to its website, GHD is a global services company that operates in the "markets of water, energy and resources, environment, property and buildings, and transportation." It provides, "engineering, architecture, environmental and construction services to private and public sector clients." It is not a specialist in social impact studies.

People's EIS caught up with GHD consultant Anne Mithieux at a Strathfield EIS exhibition session in September. She explained to us that GHD did not interview any people whose houses were being acquired directly which probably explains why her impact study contained very little detail and described the stress and disruption that is already occurring along the M5 route as if it was a future event. She saw her task as recommending mitigation for the impacts of a project that was going to happen. (This is the sort of attitude that is fueling critics' apprehension that the Planning process is a set up.) She was not uncaring but is not very familiar with the area she was studying. She seemed a little surprised about the intensity of the impacts that were already happening.

Two weeks ago, the ABC interviewed Arthur Alibrandi who told the ABC News that his 82-year-old father, Joe who has lived in his unit for nearly 50 years, had been offered an amount by WestConnex that would make it "physically impossible" for his elderly father to stay in the area.

In response, Premier Baird told the ABC, "At times, there has to be a provision for the majority, there are difficulties for some people as part of that… We're doing everything we can in terms of compensation, looking after them, provide provision for a new home."

This statement reveals a similar detachment and apparent lack of knowledge on the part of the Premier. According to the SMH, Slater and Gordon Lawyers, who are representing about 70 property owners affected by WestConnex compulsory acquisitions have found that offers are 20-50 per cent below what clients' properties are worth. This means that residents quite unexpectedly are not only losing their homes but feel they have lost control over where they can live altogether.

I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.

22.5 Kevin : another story from Underwood Road

Kevin and Ann (not their real names) are both in their eighties. Five years ago, they moved to Homebush, a community along the M5 route that will be hit hard by the WestConnex.

Initially, Kevin wasn't bothered by the WestConnex because according to earlier plans, it would have bypassed his home. But in June this year, he was told WestConnex would compulsorily acquire his home and he and Ann must move out by April. As anyone who lives in Sydney would know, nine months is not nearly enough time to unexpectedly sell and find another home.

When Kevin and Ann moved into their home five years ago, they expected to stay there for the rest of their lives. They had specifically chosen the house because it had no stairs, was walking distance to the train station and shops, and in a quiet street.
When interviewed for the People's EIS this week, Kevin said,

"I am very unhappy about the WestConnex. I can't find anywhere to replace my house. I am very old, in my 80s, so I thought the place where we are living at the moment, is our home. But I can't find anything to replace the house that is near the station and the grocery shops. There were a few houses on the market, but they are too expensive. There is no way to get one of those houses, with the money I get from our house."

"They're going to acquisition it, they're going to buy it by force."

The situation is "very stressful. Particularly for aged people like me." He describes the search for a replacement as a "nightmare" that may have "shortened my life expectancy".

He laughed when asked if WestConnex had been helpful. "No. Just one way instructions."

"WestConnex is not helping to find a new house. It did a valuation and that's it. The amount from WestConnex may be fair, but I can't find anything to replace the house with the money from WestConnex."

I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.

96 year old resident Ray Harrison lives close to what could become a massive construction site for the tunnel exit and ventilation stack. He has been regularly protesting on the streets of Haberfield

22.6 WestConnex GHD report warns of serious risks to residents, especially vulnerable ones

The GHD report did find that the acquisition process could carry ‘significant social risks’ (Appendix M, p. 96)… including ‘inaccessibility of equivalent housing at a comparable

cost…relocation health risks…[and] altered access to social infrastructure' as well as potential housing stress due to higher rent or house costs. It is 'expected that the majority of owner-occupiers would aim to relocate within the local area', and effects may be compounded by the timeframe of just 9 months for some households to be relocated, market volatility and reduced housing stock available to relocate into (Appendix M, p. 68).

It also noted that the "stress and anxiety" could lead to "impacts on health, well-being and quality of life, which have been worsened by the uncertainty and the changing footprint of the project with some dwellings originally to be acquired now not, and some originally not impacted now required for the project (Appendix M, p. 68)."

It found that the impacts would likely impact vulnerable households but that even less vulnerable households would be affected as "land acquisition would increase property demand in the local area with some households with only nine months to identify alternate properties". (Actually it is less than nine months for Kevin as some property owners have been told they must be out of their houses by April next year.)

"Overall it is anticipated that the social impacts of relocating for many of the directly affected households would be **major short-term impacts**. In some cases, where households are unable to relocate locally, the social impact may involve an extended recovery time to re-establish social networks and daily routines for work, study and recreation. Alternatively, where households need to incur higher levels of debt in order to remain in the local area, increased mortgage or rental stress may result in greater and longer term social impacts."

Short term impacts are defined as between 1 and 3 years. (Appendix M p. 23). Major impacts are substantial ones that the report states could be mitigated, although it does not explain how this might happen after residents are forced out, which is in the process of happening at the moment. So for older people this could be very serious. The stress and forced relocation could shorten their lives, particularly for those who do not have strong family support networks.

Given the lack of any in depth or direct investigation by GHD, it is disturbing that the consultant repeats and appears to accept the word of WestConnex at face value. On page 87, GDA reports:

WDA is also providing an independent service to vulnerable households (e.g. elderly, those suffering an illness) to help assist with their relocation. This service aims to provide assistance with tasks such as finding a new property (either to rent or purchase), arranging removalists, disconnection of services (electricity, gas etc.), attending appointments with solicitors and other tasks associated with relocating. With nine per cent of people in the region over the age of 70 years and 4.6 per cent
needing assistance for their daily needs, this support will be imperative to mitigating relocation disruption.

On the basis of this statement, the report concludes that "minimising dislocation of affected households from their existing socio-economic networks is a key consideration in avoiding social risks to those affected by property acquisition."

22.7 GHD report out of touch with residents' experiences

While the WDA statement quoted in the GHD report does represent the official version of what is happening, it doesn't represent what residents would have told the consultant had they been asked. The problem is that with five months to go until they empty their homes and move to new houses, residents such as Kevin claim that support is simply not there.

WestConnex Action Group Haberfield spokesperson Sharon Laura told the People's EIS, "I hope those who are currently in the process of trying to negotiate just terms for the loss of their homes are not panicked into accepting what is first on offer by WestConnex/RMS." She recommended that residents negotiate hard like Aurelia to get the best deal – and not leave their current home until they have found a suitable replacement for the home and community they are losing.

"In Haberfield and Ashfield, there are owners and tenants, who have received their PANs (notice to settle on agreed price, either as an owner or tenant), and who are being hassled to leave their homes before Christmas. Many have no idea of where they will re-locate. Some, who may have been offered a 'good price', say that even with this, they cannot afford to purchase or rent back in Haberfield or Ashfield. So much for 'just compensation' and a just process of acquisition. Money provides no 'just compensation', when a person or family is forced out of their community against their will, and in an such and untimely manner. Why should anyone leave until they are ready and have got something decent to move into?"

The WestConnex Action Group rejected Baird's assurances that the government is doing all it can to support people and called for a halt to forced acquisitions.

Aurelia's 96 year old neighbour Richard reading EcoTransit Sydney newspaper

There are also serious impacts for residents living in aged care facilities and for tenants who may find it impossible to find or afford comparable accommodation in their home suburb

I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.

For many, working to own your own home is an important part of life in Sydney, although it is increasingly unlikely for younger residents due to rising house prices. People work hard to meet

expectations. The least they expect is that when it comes to the ownership of their home, they will be treated fairly.

The picture emerging if far from what Premier Mike Baird called "doing everything we can in terms of compensation, looking after them, provide provision for a new home" or the low key distanced tone of the Westconnex GHD Social Impact study

But you don't have to be old to be severely affected by the threat of losing your home for less than its value, especially when you call Westconnex's so called free counselling service and they don't ring back.

22.8 The is the story of Kim Sun who home at 21 Young Street will be smashed for Westconnex:

For the past few months, Kim Sun has spent almost every weekend attending auctions and open home inspections in and around North Strathfield. He is desperate and stressed as house prices are way above what he can afford.

The thing is, Kim and his wife already own a lovely home debt free in North Strathfield, which they have renovated bit by bit since buying it in 2006. They've added insulation, solar power and a water tank as they expected to stay in it a lot longer. Their six year old son rides his scooter with his dad to the local school and his grandmother lives a 5 minutes drive away in same suburb.

But in November 2013, Kim received a letter from the WestConnex Delivery Authority (WDA), informing him his house was to be acquired to make way for the motorway. It was the first he'd ever heard of the WestConnex. The family must now vacate by March next year, but Kim says WestConnex will only buy their house at nearly $200,000 less than market value.

"The price Roads and Maritime Services offer means we can only buy a home very substandard to the one we are living in. And time is running out. " says Kim.

"It's not right. It should be market value. That's what they say they are offering, and it's not. They are not doing the right thing by people. Considering the project is going to cost $15.4 billion, and they need our place, and they are stressing us out, why put on that extra pressure of offering below market value."

Kim Sun's has been forced to sell his house to RMS at below market value

“It’s a difficult situation too for me because my wife doesn’t work, she looks after my son and the house. I am the only one working, so it makes it a bit difficult having to borrow extra money to find a place, so we can stay within the area, with what they are offering.”

Kim says it’s the same for everybody on their street: “We all seem to have a problem with getting the market value.”

He knows others who have had to move to the Central Coast after their house was acquired, but that’s not an option of the Sun family. “I don’t want to change schools for my son, he likes it there, and mum is close by. I don’t want to go somewhere else,” says Kim, who catches a train from North Strathfield station or Strathfield station into work at Town Hall. “We were hoping to stay here a long time, which is why we set the house up comfortably.”

The past two years of negotiations and uncertainty have taken their toll. Kim is struggling with stress and is on antidepressants. It’s a situation made worse by a lack of communication from the WDA. “I’ve tried to call WestConnex myself, but they don’t return calls,” says Kim, who has kept a log of these calls, having been assigned a ‘job number’ for each. He feels “extremely disapointed and stressed” with the way WDA has treated his family.

In July this year Kim called WestConnex wanting to know by when exactly the house had to be emptied, and also asked about accessing the free councelling service on offer. His call was never returned.

A young family, work and an ailing mother already make for a busy life, and Kim says the last thing he needed on top of it all is to be "kicked out of my home in such a short space of time now".

Asked by the People's M4EIS what he thought of Premier Baird's comment about needing to make provision for the majority, Kim says: " If I was losing my house to public transport I'd probably feel less hurt by it. I don't think the WestConnex is going to solve our problems. For me public transport would be the way to go first. And I thought 'market value' was market value. I don't see why we have to negotiate so hard with them."

I object to the WestConnex Project in its entirety, as the treatment of residents is an unacceptable. It is un-Australian.

22.9 Snippets from 'American Way' interview with Jessie J (*The Voice*) about Sydney

Speaking of adventure, Jessie says her newest discovery is an area called Newtown — best described as being the Sydney version of what Brooklyn is to Manhattan. Located two train stops from the city and bordered by the sprawling campus of The University of Sydney, the neighborhood is a little alternative with a touch of hipster chic and vintage cool thrown in for good measure.

One of her recommendations is in the historic Rocks area abutting the harbor at the northern end of the Central Business District. "The fact that you've got the Sydney Harbour Bridge, the Opera House and some great bars and restaurants all in the same area makes it very unique. There's nowhere else in the world you could be in that moment."

If she had to name one place in the city that is a nonnegotiable, it lies just across the harbor under the northern pylon of the Bridge.

"Luna Park is an old-fashioned amusement fair that's lit up beautifully at night," she says. "I feel a bit bad talking about it because it's a place the locals adore and it's got beautiful heritage architecture with a view across the water that is just beautiful. There is also a great live-music venue there, which I've actually played, so do a bit of research beforehand and you can actually catch a gig while you're there."

Ask any Sydneysider how they feel about this icon, and they'll usually tell you it shines all the brighter the longer you look at it. Much like Jessie J herself

I object to WestConnex in its entirety, as it will destroy heritage areas that are of interest to tourists, not to mention, of national interest. You can't just destroy what is the essence of Sydney.

23 Where does democracy fit in?

Prime Minister Malcolm Turnbull has created a new ministry for cities and the built environment. Announcing his decision last month, he said:

"Liveable, vibrant cities are absolutely critical to our prosperity. (They are) where the bulk of our economic growth can be found … (and they are) economic assets. (M)aking sure that Australia is a wonderful place to live in, that our cities and indeed our regional centres are wonderful places to live, is an absolutely key priority of every level of government. Because the most valuable capital in the world today is not financial capital … (it's) human capital"

The inner west and inner south is a wonderful center which is mostly people for walking – nearly 90% of people are walking at any one time, 80% of people get there by public transport. A metropolitan strategy based on walkability and public transport is exciting.

WestConnex is out of kilter. It is hard to believe that the NSW Government would have really wanted this in their array of strategic plans (it certainly was not part of the NSW Transport Master Plan 2012). Obviously – it was dropped from above aka (worst ever) PM Tony Abbott.

We need to rethink how to plan to tackle Sydney's congestion issues. Fifteen billion dollars (plus) is a very sizeable amount of money – let's put it into that altenative future, because that's where the competitive future is for Sydney, and it will give us a much more liveable city.

Let's get serious about providing a better future for Sydney and throw wasteCONnex out.

I reject WestConnex in entirety, as it has not been through the proper planning strategy. If proper protocols had been followed, such a pathetic project would not have seen the light of day.

The People of NSW have been deceived and mislead by the proponents of the WestConnex motorway.

24 Conclusion

I consider it extraordinary that the WestConnex project has progressed to the point of issuing contracts and PAN notices to residents – without following the required dNSW and Federal public money u Sw Connex project has progressed this far. A project that has not followed due project procedures. A project that has been shrouded in secrecy and unable to provide evidence that it is the right project for Sydney.

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.

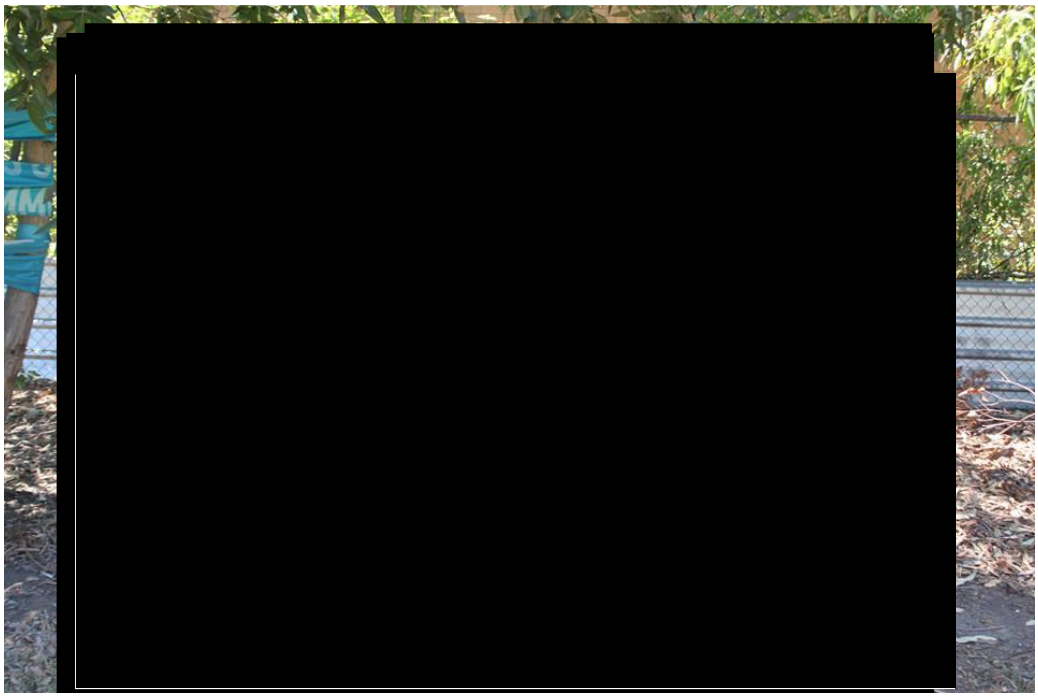
I further object to WestConnex community liaison staff **concealing information from residents.** The KGR M5 Interchange EIS stated that noise walls will be reinstated in their current form.

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.**

I understand that the Dept of Planning is under enormous pressure to approve the WestConnex project. Given the enormous community backlash and negative press to this motor-way. Given that WestConnex are really struggling with this project. The most sensible thing to do is to reject the WestConnex in its entirety and put the sad dog down.

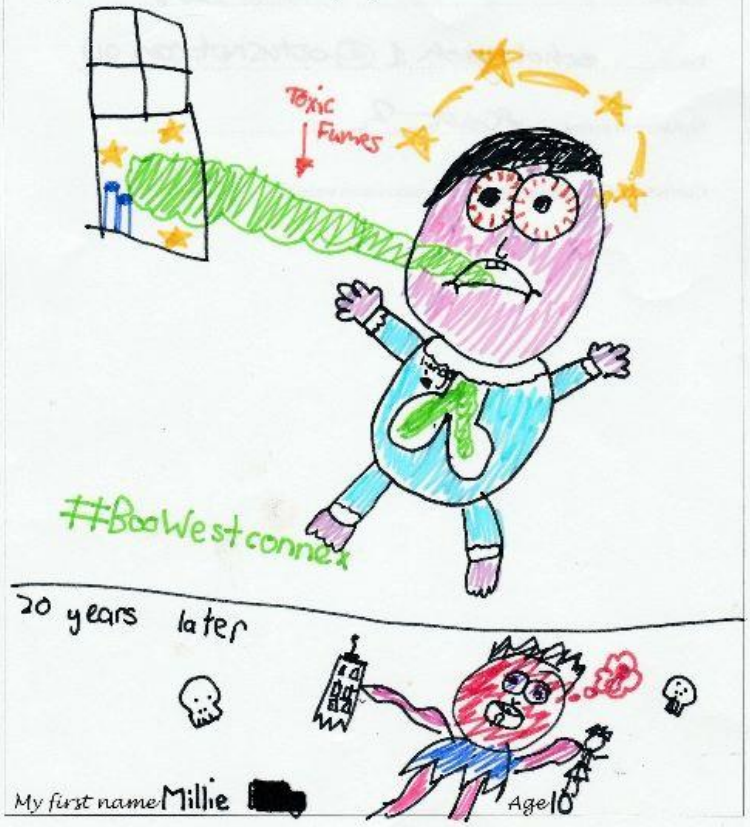
Then lets set about properly engaging the people, and getting Sydney moving with great public transport.

25 Children's voices from Kingsgrove.



Secretary
NSW Department of Planning and Environment
GPO Box 39, Sydney NSW 2001
Submission to DP & E Project Number: SSI-id_6788 WestConnex New M5

I object to the westconnex project because



20 years later

My first name Millie [redacted] Age 10

Mum or Dad to sign the back of this letter

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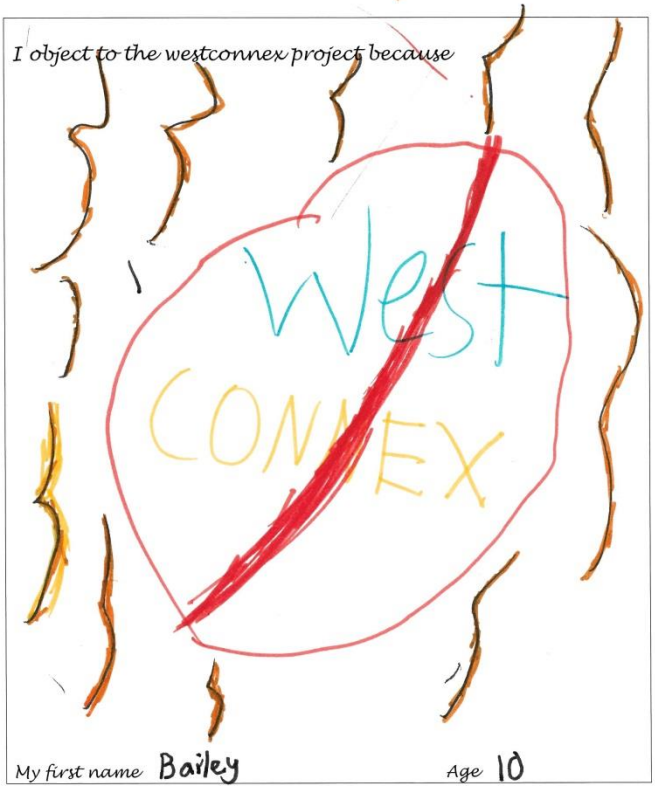

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a. The New M5 will dump over 100,000 cars and trucks in Inner West suburbs, many of which will end up on local streets. This is not by accident – it is intentional.
b. There has been no consultation with businesses in King St and other parts of Inner Sydney. King Street's thriving street life would be destroyed by increased traffic. Assurances that clearways won't be created are worthless.
c. It's outrageous that Euston Road would be expected to handle 60,000 cars or ten times more than it does now. I reject the idea that a polluted road should be bought to within several metres of existing bedrooms.
d. The EIS ignores the work of independent traffic and planning experts who have presented evidence based arguments that Westconnex won't meet its time-saving or congestion goals
e. I object to the fact that no serious traffic modelling has been done outside the project area; it is absurd to suggest that the impacts will stop at the end of the project.
f. Roads and Maritimes Services was given approval to build the old M5 on condition that it protected critically endangered flora and fauna. Now it wants to destroy that same flora and fauna for a new tollway because its old project failed to solve congestion. This would make the system of conditions meaningless.
g. I object to a weak consideration of alternatives which consists of little more than bald claims. The public deserves evidence based analysis of alternatives including public transport and traffic management.
h. Billion dollar contracts have been awarded to tollway companies although the government is aware that local government election bodies and many experts are convinced Westconnex won't deliver on its objectives. This places unreasonable pressure on planners to approve the project.
i. AECOM which has a record of failed traffic modelling has been paid $13 million to do this EIS while it has other contracts which depend on Westconnex going ahead. This is an unacceptable conflict of interest.
j. There is already insufficient parking in the Inner West. I objects to hundreds of parking spaces being removed, some permanently and some for years of construction.
k. 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.
l. 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.
m. I object to the removal of part of Sydney Park and replacing its beautiful paper bark trees with polluting traffic.
n. I object to a selection of tunnelling methods that prioritise construction timelines against the risk of vibration damage to residents' property.
o. I object to the use of an air quality model that hasn't been used in Australia before and which cannot be verified by the NSW EPA. There will be an increase in dangerous pollution in some areas close to the tollway portals, including near schools. It 's not acceptable for a government to deliberately place the health of citizens in jeopardy. I note that fine particle pollution can cause lung cancer and is particularly dangerous for the lungs of growing children.

.....,,,

Name: Rita Almohta Email: [redacted]

Suburb: Marrickville [redacted] Postcode: 2204

Please publish this submission with my name and suburb in accordance with an undertaking published on the Planning Department website

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

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Name: Alexander Tunnball Email: [redacted]

Address: [redacted]

Suburb: Alexandria Postcode: 2015

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Please publish this submission with my name and suburb in accordance with an undertaking published on the Planning Department website

Name: JULF MACKEN Email: [redacted]

[redacted] CHIPPENDALE

Suburb: CHIPPENDALE Postcode: 2008

[redacted]

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Department of Planning and Environment
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.....

Name: DARREN POWELL Email: [redacted]

Address: [redacted] MARRICKVILLE 2204

Suburb: [redacted] Postcode: _____

Please publish this submission with my name and suburb in accordance with an undertaking published on the Planning Department website

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

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

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03. It's outrageous that Euston Road would be expected to handle 60,000 cars or ten times more than it does now. I reject the idea that a polluted road should be bought to within several metres of existing bedrooms.
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Name: PETER BALDWIN Email [redacted]

Suburb: MARRICKVILLE Postcode: 2204

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

1970

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.....

Name: Romeo Sartor [redacted] Email: [redacted]

Suburb: St. Peters Postcode: 2044

Please publish this submission with my name and suburb in accordance with an undertaking published on the Planning Department website

[redacted]

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

1971

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.....[redacted].....,,,

Name: JOE SHARMAN Email: [redacted]

Address: [redacted]

Suburb: HURLSTONE PARK Postcode: 2193

Please publish this submission with my name and suburb in accordance with an undertaking published on the Planning Department website

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

1972

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

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3rd. It's outrageous that Euston Road would be expected to handle 60,000 cars or ten times more than it does now. I reject the idea that a polluted road should be bought to within several metres of existing bedrooms.

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Name: Lucille VROLIJART Email: [redacted]

Address: [redacted]

Suburb: Marrickville Postcode: 2204

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

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Name: TIM IRVING Email: [redacted]

[redacted]

Suburb: HOMEBUSH Postcode: 2140

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Secretary
Department of Planning and Environment
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Please publish this submission with my name and suburb in accordance with an undertaking published on the Planning Department website

Name: Madeleine Binting Email [redacted]
Address: [redacted]
Suburb: Gladesville Postcode: 2111

Secretary
Department of Planning and Environment
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Please publish this submission with my name and suburb in accordance with an undertaking published on the Planning Department website

Name: allister morris Email: [redacted]

Address: [redacted]

Suburb: ALEXANDRIA Postcode: 2015.

[redacted] 17/01/16

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

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.....

Name: Kim Hilland [redacted]: [redacted]

Address: [redacted]

Suburb: Lewisham Postcode: 2049

[redacted]

Secretary
Department of Planning and Environment
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Name: F. STEWART Email [redacted]

[redacted], FERSKINEVILLE

Suburb: FERSKINEVILLE, Postcode: 2043

Please publish this submission with my name and suburb in accordance with an undertaking published on the Planning Department website

[redacted]

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

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

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- *The New M5 will dump over 100,000 cars and trucks in Inner West suburbs, many of which will end up on local streets. This is not by accident – it is intentional.*
- *There has been no consultation with businesses in King St and other parts of Inner Sydney. King Street's thriving street life would be destroyed by increased traffic. Assurances that clearways won't be created are worthless.*
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Name: WARREN O'BRIEN Email: [redacted]

Address: [redacted]

Suburb: ST PETERS Postcode: 2044

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Department of Planning and Environment
Box 39, Sydney NSW 2001

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.....,,,

Name: Catherine Carr Email: [redacted]

Address: [redacted] Pyrmont

Suburb: [redacted] Postcode: 2009

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Name: Verda Grant Email: [redacted]

Address: [redacted]

Suburb: Mascot Postcode: 2204

[redacted]

Secretary
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.....

Name: Michellesusanroach Email [redacted]

Address: [redacted]

Suburb: Tighes Hill Postcode: 2297.

[redacted]

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Name: Fiorella Kis-Major Email: [redacted]

Address: [redacted]

Suburb: Newtown Postcode: 2042

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Name: JUDITH PARSONS Email [redacted]

Address: [redacted]

Suburb: Petersham Postcode: 2049

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Name: Rhett Ryan Email [redacted]

Address: [redacted]

Suburb: Palmerston Postcode: 2913

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Name: KAREN WHITE Email [redacted]

Address [redacted]

Suburb: BALGOWLAH NSW Postcode: 2093

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Please publish this submission with my name and suburb in accordance with an undertaking published on the Planning Department website

Name: D WILLIAMS [redacted] Email: [redacted]
Address: [redacted]
Suburb: MARRICKVILLE Postcode: 2204

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

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

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 New M5 will dump over 100,000 cars and trucks in Inner West suburbs, many of which will end up on local streets. This is not by accident – it is intentional.
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Name: E. HODGE Email: [redacted]

Address: [redacted]

Suburb: ST LEONARDS Postcode: 2065

Please publish this submission with my name and suburb in accordance with an undertaking published on the Planning Department website

[redacted]

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Name: Helen Basili Email [redacted]

Addres[redacted]

Suburb: Petersham Postcode: 2049

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.....

Name: Elizabeth Rownes Email: [redacted]

[redacted]

Suburb: Marrickville Postcode: 2204

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Department of Planning and Environment
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Name: KAY SÖDERLUND Email: [redacted]

Address: [redacted]

Suburb: MARRICKVILLE Postcode: 2204

[redacted]

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

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Name: Rachael Keenan Email: [redacted]
Address: [redacted]
Suburb: Petersham Postcode: 2049
[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: Michael Gratton
[redacted]

Address:
[redacted]

Newtown, NSW
2042

Content:
To whom it may concern,

Please find enclosed my submission to WestConnex New M5 EIS, project number SSI 14_6788

I strongly object to the New M5 roadway and the entire WestConnex development, and ask that you reject the proposal outright.

WestConnex and the New M5 will not solve Sydney's traffic problems. Throughout the history of the project, traffic projections have been continually downgraded so that now travel times show minimal improvement. Further, as evidence from around the world has shown, building new roadways does not represent a long-term solution to traffic congestion - rather, new roads and increasing road capacity simply encourages more people to drive, erasing any short-term reduction in congestion.

Further, the WestConnex and the New M5 as outlined in the EIS suffers from the following grave problems:

1. 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), which given the cost of the project is a staggering failing
2. The project is already suffering from cost blow outs in an order of $2 billion per year
3. The project has no clear economic or "transformational" benefit
4. The amount spent on the project could be used instead to build a public transport system with all the benefits of all the benefits of, but none of the disadvantages of WestConnex
5. The increase in motor traffic caused by the new motorway will cause a large increase in both green house gases, carcinogens and other pollutants.
6. The construction of the project will damage and destroy large amounts of important wildlife habitat and green space
7. The increase in motor traffic caused by the new motorway will harm the amenity of the neighbourhoods where the motorway interchanges with the existing road network in the Inner West.

In addition to the intrinsic flaws in the project itself, the EIS document and research is similarly flawed:

- The project objectives are biased towards a motorway solution, so that any proposed alternative falls short of the proposed solution and hence does not represent a valid comparison study.
- No examination of alternatives means of handling the increased traffic (e.g. by the already at-capacity widened M5 East) were examined, including public transport improvements.
- No contingency plan is provided for when the new motorway itself reaches capacity in the near future.
- The motorway 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 and hence the EIS may not have taken into account projected traffic

and other issues past that date
- The EIS fails to model traffic beyond two intersections after this project, which obscures the impact to King Street and roads in Alexandria.

Once again, I call on you to reject the project outright, and request a response to each of the points I have raised above.

Sincerely,
Michael Gratton
Enmore NSW 2042

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Content:
I believe that Westconnex is the wrong solution to fixing traffic congestion in Sydney. It is my opinion that the money should be spent on improving the Public Transport network. We should be enticing people out of cars by providing other options to move around and not further embedding the car culture. No matter how many extra traffic lanes are provided, the latent demand will see them fill up in a short time.

In particular the intersection at St Peters will remove a significant amount of space from Sydney Park and will induce more traffic on the streets of Alexandria, Erskineville and Newton and will likely destroy the vibrancy found on King Street today.

However if this project is to proceed then please can you ensure that the M5 East Green Link is included as part of scope. This should link up with the M5 Cycleway and provide a safe off road route for people from the South West to walk or to cycle to the Airport and towards the city thus reducing the pressure on the road network.

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: Emily English
[redacted]

Address:
[redacted]

Beverly Hills, NSW
2209

Content:
I strongly object to WestConnex. It is not in the best interest for Sydney

[redacted]

[redacted]

[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 write to express my strong objection to the WestConnex New M5 East motorway proposal as well as the entire WestConnex project in entirety.

The strategic justification for the New M5 is weak and inconsistent with the NSW Governments strategic planning and policy framework.

The 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 blown out to $16.8 Billion (and expected to increase significantly) which is not fully funded. WestConnex represents a significant opportunity cost. This level of investment could deliver other projects of significant economic and social value to the state which could benefit a greater number of people and businesses.

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 Sydney into a road project with inadequate assessment, and then for the proponent to find that it is a myriad of more and more expensive toll roads, and more and more road widening in a desperate effort to try and make it work. This is not how infrastructure planning should be conducted, and thus reasonable for the community to consider that this is road planning on the run.

The weaknesses of the proposal have been amplified through poor project governance.

I strongly urge the Department of Planning & Environment to not approve the New M5 East and the WestConnex project in its entirety as it is not in the best interests for Sydney.

It is concerning that over one million people will be directly impacted by the WestConnex project and the myriad of 'complementary' works.

It is concerning that the project is being released in sections, in an effort to avoid the scrutiny of the huge social , environment and financial risks that NSW is exposed.

I consider the inadequacy of the New M5 EIS is so profound that I do not consider that it can be used as the basis for a Ministerial determination to approve the project.

In short, I reject motorway investment of this scale, in this century, stating only rail infrastructure (light, heavy, freight) can keep this city liveable and functional if we wish to maintain a 'global' economic status based on population and investment growth.

The WestConnex project does not fit within the rationale of the NSW Master Transport Plan – for which it claims it is front and center despite retrofitted after the initial Plan release:

"Regular physical activity is important to our health and wellbeing. Recent research shows that many people get an additional eight to 10 minutes of exercise each day when they use public transport. Importantly, being active for part of our journey to work or school incorporates exercise into our daily routines. The NSW Centre for Population Health has observed that public transport use, walking and cycling are associated with a number of health benefits, including a reduced incidence of obesity, higher levels of exercise and improved mental health.

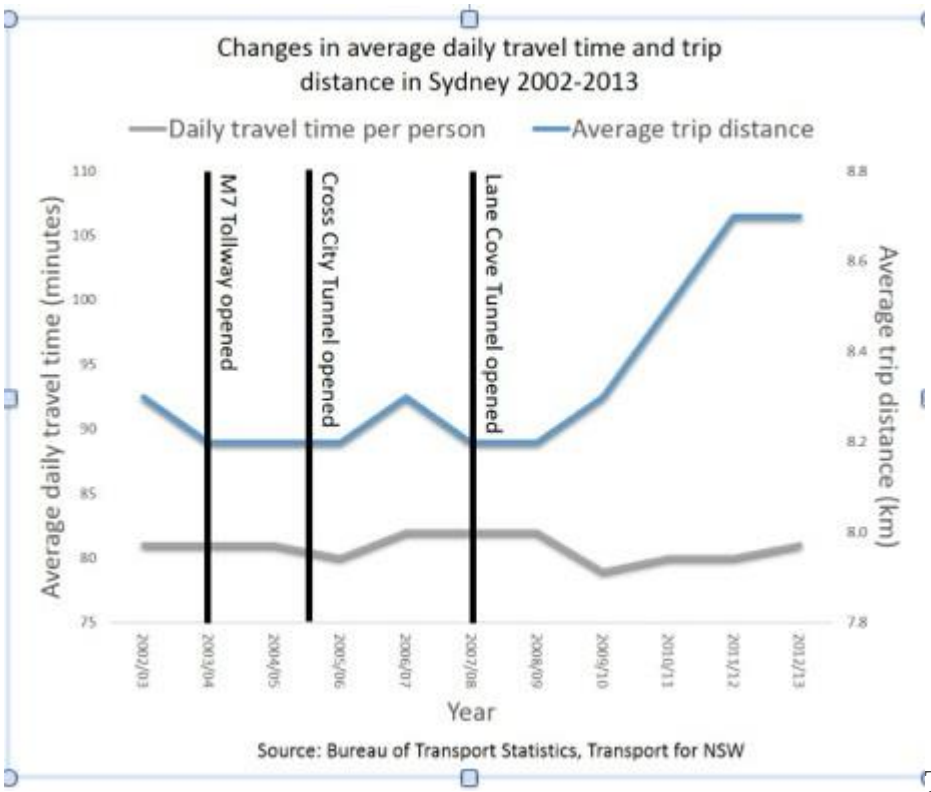
Building social and community goals into our transport planning will strengthen communities, reduce disadvantage and open up opportunities. To meet our objective of reducing social disadvantage, we will require new ways of thinking about how to distribute transport services more evenly across the State. We will need to give people healthier travel options, such as making it easier and safer to cycle to work or walk to the nearest train station. We will also need to integrate our transport system more closely with land use planning, creating well-designed cities and suburban centres that ***reduce our reliance on cars****, encourage us to be more active and produce safe, attractive and well-used urban spaces".*

1 Summary of objections based on subject area:

The very short time period has not been sufficient to address technical issues in this EIS. This is in itself a **corruption of the democratic process** to deny the public the opportunity to assess nearly 8000 page EIS during the Christmas holidays when school groups have not been granted the opportunity to respond. I request the EIS response time be extended to end March 2016.

1. The EIS does not comply with the Secretary Environmental Assessment Requirements (SEARS).
2. There are major issues with the Traffic and Transport Assessment. There is insufficient information about the modelling inputs, assumptions and methodology for the forecasts to be independently verified. There is no sensitivity analysis of key assumptions.

3. The social and environmental impacts described in the EIS are unacceptable and far outweigh any benefits of the project. **Because of flaws in the modelling, the actual impacts are likely to be even greater than those forecast.**
4. The project does not meet the project objectives.
5. Many of the project objectives, such as congestion relief, could be met through better management of demand on the existing road network, e.g., through reform of road pricing. The corridor already has an extensive and high capacity road network; there is just too much demand at present for it to operate effectively. Adding more capacity will not lessen this demand; it will only serve to increase it.
6. 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 can be effective in meeting the main project objective (reducing congestion), then what is the rationale for adding more capacity
7. The project makes little sense from a transport planning and policy perspective. The role of motorways is to allow traffic to circumvent densely populated areas. For radial transport into and out of urban centres, mass transit is more efficient and economical, and has less impact on the human population.
8. The project is not in the public interest. It will be used by less than 1% of the NSW population each day. The rest of the population will pay dearly in terms of higher traffic impacts, poorer air quality, and state and federal taxes being diverted from public transport and other more worthy causes?
9. 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).
10. 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 (see graph below). 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 higher speed of tollways has simply encouraged people to move further from work, drive more, and make longer trips than before, for example, visiting shopping malls instead of local shops. It has made road more attractive than rail for freight.

11. **This predict and provide approach to transport planning has been a failure, and is being abandoned by advanced nations. In a city of 5 million people, we can never provide enough road capacity to enable everyone to live as far from work as they like, and drive wherever and whenever they like in free flowing traffic.**

2 Failure of Project Governance

I object to the entire WestConnex project as it has failed to follow the correct and disciplined project governance requirements. Please respond to the below

2.1 Lack of Transparency and Proper Process in Project Selection

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' bypassing important evaluation steps aimed at providing assurance to government and the taxpayers that the project is the best solution.

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)

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)

"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)

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

Unfortunately, the WestConnex project **does not appear to be an example of industry best practice** in project selection and transparency (see NSW Auditor General's comments below). Calls for the release of the business case have been opposed by both the Federal and NSW governments. **If there is such a compelling business case, then why isn't it being shared with the Australian taxpayers who are bearing the risks associated with this project.**

The 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 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)

2.2 WestConnex Concept

"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)

2.3 Developing the business case

"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)

2.4 Gateway review of preliminary business case

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

(p.29)

Red: critical and urgent – project strategy to address the shortcomings/recommendations is to be established before project is further progressed.

Yellow: Important and urgent – project should go forward with action on recommendations. Source: WestConnex preliminary business case Gateway review 2013.

2.5 Matters a Gateway review may have identified

"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)

2.6 Purpose of the 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)

I reject the WestConnex project in its entirety as WDA have been unable to present any evidence of project viability.

2.7 Solution mode prior to analysis

The 'Captains Call' to build a road was decided without exploring other options from an expert analysis of Sydney's congestion problems. The intricate science of public transport was ignored, as well as decades of world experience that building motorways through an inner city does not solve congestion.

This project has had nothing to do with Infrastructure Australia's processes, nothing to do with a strategic approach to building transport, nothing about getting better economic productivity, let alone sustainability.

Tony Abbott and Nick Greiner have had a bizarre aversion to Public Transport, thus leading to this enormous Folly.

It is unacceptable that out- of-touch politicians and ex-politicians should jump into solution mode and decide to build the WestConnex motorway. Leaving RMS/WDA staff scrambling to find something (anything) to justify the project.

It is unacceptable that correct project procedures of understanding the core problem and identifying the best solution that meets the cost / benefit analysis was ignored.

It is unacceptable that the recommendations of Independent Infrastructure Experts were ignored.

It is unacceptable that a spend of $16.8 billion (plus) and 10 years of destruction and inconvenience for upwards one million people is justified with a Sydney road network improvement of just one kilometer per hour. (*source KGR M5 Vol 1 page v)

On this basis I reject the entire WestConnex project as not the solution to Sydney's congestion.

The failure to abide by the Major Projects Assurance Framework and employ best practice governance from project inception has greatly reduced community confidence. The Community is being asked to comment on an EIS that is deficient in analysis of project justification.

A condition of consent for the New M5 East should include adherence to the NSW Government's Major Projects Assurance Framework. Vital gateway reviews which 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.

Footnotes

1. Inquiry into Public Infrastructure, Productivity Commission (2014)
2. Submission to Select Committee into the Abbott Government's Budget Cuts, Marion Terrill, Transport Program Director, Grattan Institute (August 2015)

Abbott is now gone. Let's that the opportunity to conduct a Federal Audit of Westconnex, the ancillory works and complementary works. Then turn to investing our money, energy and expertise in Public Transport that will enliven Sydney, particularly the Western Suburbs.

2.8 Shutting down public scrutiny

As reported SMH 17 October 2015, the largest transport project in the country – WestConnex - is shielded from public scrutiny after the Government has transferred control to a "private corporation". The Sydney Motorway Corporation. There are no representatives of transport agencies on the Board. A Board comprised of Treasury officials, builders and financiers.

According to Labor's spokeswoman, Jodi McKay, it is "all about shutting down scrutiny". She has also commented that "I do not understand how they can call themselves a private corporation when they have two minister share-holders".

This era will be long remembered as a shameful corruption of the democratic process for NSW.

On this basis I reject the entire WestConnex project as it concerns me greatly the loss of transparency by transferring the delivery of the project to a 'private company'. This is not democracy.

2.9 AECOM and Conflict of Interest

Experts and academics have been critical of the AECOM traffic studies for this project, one complaining that there is insufficient information about assumptions behind the Westconnex Traffic Model for other researchers to test it independently.

This can only add to community unease about the EIS and planning process, especially because AECOM has not used the opportunity of the EIS report to respond to or engage with independent consultants as SCG Consulting that have questioned its traffic predictions for the WestConnex M4.ely on government departments to seriously evaluate the project and engage with critiques. Unfortunately, the Planning Department will publish the responses to the EIS on its website. Westconnex and

AECOM will then prepare a 'responses report'. Planners, health experts and others inside government say they will then be pressured to sign off on the EIS, although many know it is poor social policy.

The same firm is the subject of an ongoing legal action in Queensland – more than 650 investors are suing for $150 million, claiming the company's traffic predictions for a privately-owned toll-road in Brisbane were substantially inflated

Is it too much to hope that the Minister for Planning Rob Stokes and professional planners employed by the NSW government take time to seriously consider the substantial critiques of the project? From the public's point of view, it would be so much better to stop now rather than be stuck with another failed tollway project.

On the basis on questionable independence and integrity of the planning assessment process I reject the WestConnex project in its entirety.

2.10 Failed EIS Process

An EIS is supposed to honestly and fully discuss the costs and economic benefits as well as the social and environmental effects of a project as well as alternatives to it, but the EIS for the M4 East section, King Georges Road Interchange and the New M5 EIS is nothing more than a shoddy and evasive sales pitch.

I object because the whole process has been corrupted by the agencies who are its proponents. This is evidenced by, the awarding of contracts for the project, notice of compulsory acquisition of family homes and the planned destruction of local communities, all before the matter has been considered and approved.

These factors combined have left local residents feeling sad and angry about the process to date and left many feeling sceptical that there is any real concern about their rights and welfare. In addition no comprehensive business case has been presented and the arguments in the 8000 page EIS are simplistic and lack depth.

I object that the community was only granted 60 days to review the New M5 EIS. A minimum of 90 days should have been granted.

On this basis I reject the entire WestConnex project due to the failed EIS process.

2.11 Failure to engage in Community Participation & Discussion

It is unacceptable that the community and councils have not been engaged in meaningful dialogue and involvement in the future of Sydney and this project.

- The various so-called 'information sessions' have been a sham
- The information kiosks are not attended by informed staff

- The distributed material contains information meant to mislead.
- The distributed material is specifically designed to not advertise the project

WDA repeatedly quotes unsubstantiated 'benefits' across the entire project, yet downplays negative impacts to just the immediate section.

It is time that there is a meaningful discussion on transport infrastructure in this city. It is time to address demand management.

It is time in 2016 to ramp up the campaign to raise public awareness of a healthier and environmentally friendly commute to destinations. It is time that Urban Planning incorporates models of walkability when planning new suburbs. It is time that the public become very aware of the real cost of driving – both financially and the space that automobiles and roads take up. And, it is time to really penalise single passenger vehicles when public transport is available via (eg) via tolls and congestion tax.

It is time that our cities are returned to the people. Sixty years of priority has been given to automobiles and their domination of our landscape vs the livability of our suburbs.

I therefore reject the WestConnex project in entirety, as it has not been presented in a way that enables the public to determine if the proposal is an appropriate and effective solution for Sydney's significant transport problems.

2.12 Failure to disclose negative impacts in a timely and transparent fashion

WDA has been known to hide negative information that is essential for the community to form an opinion. Recent examples:

- Information kiosks at the shopping centers and information sessions:
    - Failure to incorporate the locations of unfiltered stacks in material
    - Failure to disclose the amount of greenspace and parks lost to the motorway
    - Failure to properly disclose the tolls & reintroduction of tolls on existing roads
    - Failure to disclose the number of people that will be displaced
    - Failure to disclose the number of businesses compulsory acquired and the jobs lost
    - Failure to disclose the method of calculation & definition of "up to 10000 new jobs" and failure to deduct the permanent jobs lost.
    - Failure to disclose that there is no appropriate monitoring of PM2.5 and less.
- Information distributed to Arncliffe residents failed to disclose the horrible impact on the endangered Green and Golden Bell Frogs.
- Confirmation that an unfiltered exhaust stack at Kingsgrove was planned. WDA staff member was very evasive to confirm that this was fact in June 2015.
- The eventual disclosure stating that this stack was located in an industrial area. No. It is a business park and located near nine schools and many homes and places of employment

2.13 Failure to incorporate Community Feedback from EIS

WDA have never incorporated community feedback in their designs, as evidenced by residents impacted by the KGR M5 Interchange at Beverly Hills. Even if data contained in the EIS was pointed out as incorrect.

- The response to residents was '*we will explain it differently, so you might understand*' our (flawed) vision.
- I object that all reasonable requests by Beverly Hills residents were denied on the grounds they were not reasonable or not feasible. The real answer is that the project is delivering the cheapest possible engineering design – at a permanent cost to residents.
- I object that the community and our local councils have been denied a voice.
- I object that residents have had to take extraordinary action to be 'heard'.
- Failure to address existing significant noise by refusing additional noise attenuation of transparent walls on the span the Cooloongatta Rd bridge replacing the wire. Rejected because it was too expensive (but happy to spend the money enhancing the motorists experience)

2.14 Failure to engage highly impacted residents during constructions.

There is a consistent effort by Westconnex Liason Staff in properly informing residents of construction impacts.

Residents of Elouera St Beverly Hills were not informed that heavy vehicles would be using their street. To add insult to injury, these trucks could idle in front of peoples homes. The longest was ONE HOUR. It is not good enough that multiple residents have to remind the construction company on a daily basis that idling trucks is a breach of conditions.

Failure to advise residents of Allambee Cresc South Beverly Hills that their park at the end of their street would be used as a construction zone. No letter drops. Just suddenly turned up one Friday morning and started tearing down the trees.

Thursday afternoon. Kids playing in the park at the end of Allambee Cres Beverly Hills

Friday afternoon. Park destroyed. And to add insult to injury, the workers did not turn down their high pitch reverse beepers. This was a condition of approval. Daily reminders to the Construction Company is not good enough!!

3 Project & Broader Westconnex scheme

1) The proposed New M5 and broader WestConnex scheme are not in the public interest.

1. Any personal travel time savings generated by the project will not benefit the economy, and will be cancelled out in time by induced demand and induced sprawl.
2. The New M5 will be used by less than one percent of the NSW population each day. The costs will be borne by the whole population.
3. 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.
4. There are numerous ways of spending $16.8 billion that would deliver a much greater social and economic benefit, and would not cause so much destruction.

2) The EIS authors (AECOM) have not modelled or objectively assessed alternative policy scenarios that could meet the transport/accessibility needs of NSW's growing population (individually or in combination), e.g.:

1. Greater investment in mass/public transport;
2. Demand management/road pricing reform
3. Land use planning that places homes, employment and services closer together

3) It is no secret that the primary 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 in the scheme as a means of paying for it (through tolls). However, there are various policy alternatives for dealing with the growing freight task that have not been objectively assessed in the EIS, e.g.:

1. Improve the capacity and reliability of rail freight.
2. Increase rail/intermodal freight subsidies to match those of road freight.
3. Divert container operations to other ports outside the city centre. It does not make sense to concentrate container operations in the city centre where road access is costly and has significant impacts on the surrounding residential areas. An expansion of the

Port Kembla container terminal, which already has good road/rail access, would stimulate the Illawarra region's economy.

4. Freight demand management, e.g., incentivise shorter supply chains and local supply.

4) The new intermodal terminals at Moorebank and St Marys, along with the planned upgrades to the Port Botany rail freight rail line, will significantly increase the share of freight that can leave/enter Port Botany by rail. Against this background, spending $16.8 billion on marginal improvements to road freight access must be questioned. Is the proponent (RMS) aware of the new intermodal terminals?

5) 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. In particular the assumed toll price, on which the traffic forecasts heavily depend, has not been stated.

6) 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. AECOM has a history of overestimating the willingness of motorists to pay for toll roads, resulting in overly-optimistic traffic forecasts and financial failures (e.g., Clem7).

7) There is **no modelling/objective assessment of the travel time and accessibility impacts for non-motorised modes (walk and bicycle)** in the Traffic and Transport Assessment

8) The issue of **induced demand** has not been adequately addressed in the Traffic and Transport Assessment.

9) Given the major flaws with the 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:

1. Air quality
2. Noise and vibration
3. Human health
4. Greenhouse Gases

10) The **role of motorways in a multimodal urban transport network is to allow traffic to circumvent populated urban areas, and to connect less densely populated areas** (where mass transit is not justified). For radial transport into and out of employment/activity centres, mass transit (e.g., rail) is faster, more efficient, requires less space, and has fewer impacts on highly populated urban areas.

11) **The EIS does not consider the cumulative costs and impacts 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:

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%.
2. Serious human health impacts due to petrochemical vehicle emissions/smog, including:
    1. Lung cancer,
    2. Asthma
    3. Heart disease,
    4. Impaired lung 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. Increasing numbers of people losing sleep due to traffic noise pollution.
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 areas/buildings.
12. Irreversible biodiversity loss.

13. Less incidental physical activity from walking and bicycling (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

4 WestConnex fails the objectives of the NSW Transport Master Plan

4.1 What came first – WestConnex or the Strategic Plans?

WestConnex is an anomaly to the NSW Transport Master Plan 2012

The WestConnex EIS claims that it was a legitimate part of the long term transport planning for NSW for which it is very obvious that it was retrofitted after the event.

The NSW Master Transport Plan December 2012 was written from the perspective of improving the mobility for residents and visitors to Sydney through the modernising and connectivity of Public Transport.

The focus mentioned frequently throughout the document was to reduce car dependency and thus congestion by investing further in the various modes public transport. The main initiatives were to address the lack of rail connectivity, by enhancing the current radial mode to be a more networked and connected system. It also included complementary improvements with other modes, such as increase dedicated bus lanes plus BRT, increased cycle-ways and encouraging walkability. The livability of communities and protection of the environment was a key outcome of the Plan.

"Most of Sydney's rail network was built more than 100 years ago and is primarily centred on servicing the CBD. There has been little recent expansion of the network, with 39 kilometres of the total CityRail system of 1,050 kilometres built in the past 33 years (as at 2012).. As Sydney has grown and evolved to a multi-centred city, its needs have changed and our rail system needs to evolve to keep up with these changes."

"Businesses often cite the lack of public transport connectivity as an inhibitor to establishing a presence in the three regional cities of Parramatta, Penrith and Liverpool, as well as precincts like Macquarie Park, Sydney Olympic Park and Port Botany".

"By enabling industries to set up in the regions, in transport terms, this would reduce the impacts of dispersed employment in Greater Sydney, alleviate car dependency and long commutes, and promote more liveable communities".

The below comments – lifted from the Master Plan – succinctly encapsulate the rationale of this Plan:

"Regular physical activity is important to our health and wellbeing. Recent research shows that many people get an additional eight to 10 minutes of exercise each day when they use public transport. Importantly, being active for part of our journey to work or school incorporates exercise into our daily routines. The NSW Centre for Population Health has observed that public transport use, walking and cycling are associated with a number of health benefits, including a reduced incidence of obesity, higher levels of exercise and improved mental health.

Building social and community goals into our transport planning will strengthen communities, reduce disadvantage and open up opportunities. To meet our objective of reducing social disadvantage, we will require new ways of thinking about how to distribute transport services more evenly across the State. We will need to give people healthier travel options, such as making it easier and safer to cycle to work or walk to the nearest train station. We will also need to integrate our transport system more closely with land use planning, creating well-designed cities and suburban centres that reduce our reliance on cars, encourage us to be more active and produce safe, attractive and well-used urban spaces".

The inclusion of the WestConnex project at various points throughout the document is an anomaly to the key rationale of the original document.

NSW Master Transport Plan Vision

"*The city will become more liveable by improving the design of buildings and public areas, developing mixed-use spaces where people work and live, and creating more opportunities for people to walk and cycle to work and major service centres. Protecting our natural environment, improving access to green spaces and improving air quality will be critical. The Metropolitan Strategy for Sydney underpins this land use and planning vision for Metropolitan Sydney to 2031.*

Central to these outcomes will be an integrated and efficient transport system that is closely aligned with land use planning. Sydney's transport infrastructure and services will cater to the customer, providing diverse transport options and reduced travel times, while being readily accessible across all parts of the city. Improved public transport networks will increase productivity and global competitiveness."

***"Improve sustainability** – by maintaining and optimising the use of the transport network, easing congestion, growing the proportion of travel by sustainable modes such as public transport, walking and cycling, and becoming more energy efficient"*

"For public transport - If Under a 'do nothing' scenario, most travel in Sydney would continue to be by motor vehicle, with roughly the same percentage of trips still made by car in 2031.

*"Transport has an important role in supporting Sydney as a global city. **Strong connectivity across the city, quality public transport networks and opportunities for walking and cycling can all contribute to maintaining Sydney's role as a centre of economic and social activity".***

"The city will become more liveable by improving the design of buildings and public areas, developing mixed-use spaces where people work and live, and creating more opportunities for people to walk and cycle to work and major service centres. Protecting our natural environment, improving access to green spaces and improving air quality will be critical.

*"Central to these outcomes will be an integrated and efficient transport system that is closely aligned with land use planning. Sydney's transport infrastructure and services will cater to the customer, providing diverse transport options and reduced travel times, while being readily accessible across all parts of the city. **Improved public transport networks will increase productivity and global competitiveness"***

The Master Plan also goes on with the rationale "Currently, ***around 14 percent of greenhouse gas (GHG)*** *emissions produced in NSW come from the* ***transport sector****, making it the State's* ***second highest source*** *of emissions. In the context of population growth and increasing travel demand, mitigating GHG emissions is a major challenge for the future".*

*"****Providing people with opportunities to use public transport instead of private vehicles*** *will help to reduce the environmental impact of transport in NSW. Increased walking and cycling, particularly for short, local trips, will also contribute to improved environmental outcomes."*

" *The cost and availability of oil and the rising cost of electricity will also have a direct influence on the choices we make in procuring the most environmentally sustainable and energy efficient technologies to power our transport fleets".*

"The growing travel task is also a challenge for preserving the amenity of many of our communities. The movement of freight is rarely silent and the generation of noise on a shared network in proximity to residential areas is a recognised issue".

The WestConnex project and its horrible impact on communities, vulnerable species and the environment is a complete juxtaposition to the vision for Sydney's mobility by Gladys Berejiklian (previous Minister for Transport)

Please explain HOW WestConnex fits into the above rationale

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 center 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 M5 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 centerpiece 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.

I strongly object to the WestConnex project, as it fails to match any of the required core outcomes of the NSW Travel Master Plan.

I strongly object to the WestConnex project as it represents a lost opportunity to "Get Sydney moving". The funds required to fully implement the exciting public transport projects that will significantly improve connectivity of rail; bus, cycle and walking opportunities as proposed by Ms Berejilian will not be available. Instead, funds are redirected to a road project that is a space hungry,

low volume mode of transport. It eschews Ms Berejiklian's rational plan for Sydney, instead resulting in the perpetuation of car dependency, more pollution, more traffic noise, more congestion, and more GHG emissions. It reduces the livability and amenity of our suburbs. It removes important greenspace and vegetation that is critical for the survival of vulnerable species and for the health and wellbeing of residents.

I point out that Inner-West Light Rail patronage has increased by 68% resulting in the need for 90 more services. How many cars has this infrastructure taken off the roads. The people voted. With their patronage.

I strongly object to the misrepresentation contained in the EIS that WestConnex was part of the NSW Transport Master Plan 2012. WestConnex was retrofitted in 2013, and was never a legitimate part of the long term plan scope.

5 The project fails to properly assess alternatives

To paraphrase a misattribution of Einstein ... the definition of insanity is to do the same thing over and over again, and expect a different result.

The SEARS provide for 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 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.

Finding: FAIL

Comment: The EIS does not include cost-benefit analysis, modelling, or any other objective analysis of feasible alternatives. Only cursory descriptions are provided.

No alternative staging strategies are described or objectively assessed.

6 Cumulative aspects and proposal's relationship to rest of Westconnex works

Details of the proposal's relationship to and consistency with the broader WestConnex, and an assessment of the cumulative impacts taking into consideration the WestConnex program of works.

Finding : FAIL

Comment: Cumulative construction impacts for the New M5 and other WestConnex projects have not been modelled/reported. Only a 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:
    1. Lung cancer,
    2. Asthma,
    3. Heart disease,
    4. 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.

7 Meeting objectives of the entire Westconnex

Finding : FAIL

Comment: finds that the project **FAILS** to meet the Westconnex objectives. This will be covered in Part 3 of this submission.

8 Impact of New M5 on traffic and transport after start of operation

Requirement: 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).

Finding : FAIL

Comment :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.

9 Induced traffic

Requirement: Induced traffic and operational implications for public transport (particularly with respect to strategic bus corridors and bus routes) and future public transport opportunities.

Finding : FAIL

Comment: 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 my 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.

10 Cyclists and Pedestrians

Requirement: Impacts on cyclists and pedestrian access and safety and consideration of opportunities to integrate cycleway and pedestrian elements with surrounding networks.

Finding : FAIL

Comment: 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 transport model (WRTM) nor the intersection models (LinSig). There is no forecast of the impacts on walking and bicycling travel times and accessibility.

11 Air Quality

Requirement: 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.

Finding: FAIL

Comment: 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.

12 Human Health Impacts

An assessment of human health impacts.

Finding : FAIL

Comment: 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.

13 Noise Impacts

Requirement: 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).

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.

13.1 Sydney has underinvested in public transport over the past 30 years

In 1998 the NSW government released Action for Transport 2010 an integrated transport plan for Sydney. The plan proposed to:

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

(Action for Transport 2010 an integrated transport plan for Sydney, 1998, NSW Government p.2)

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

(p. 3)

The plan listed (at page 5) 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**) and recently to Dulwich Hill

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)

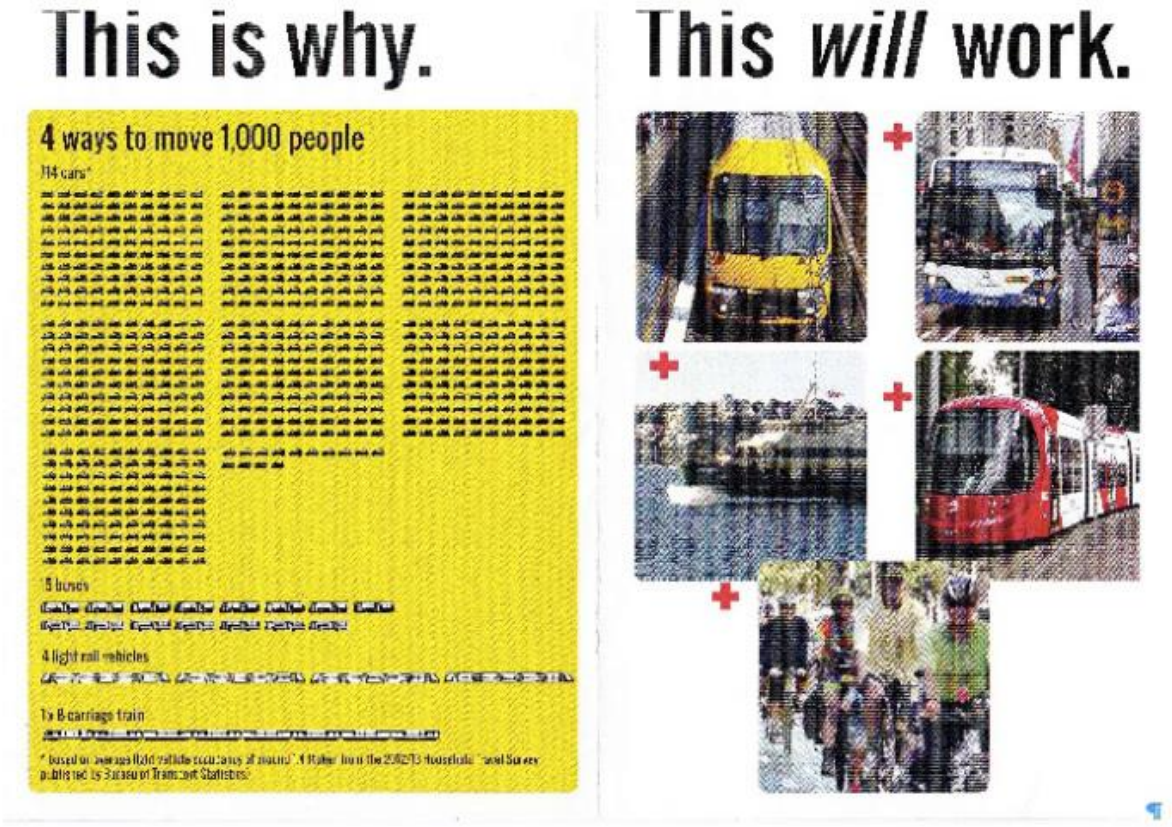
All the projects in bold were built. It can be seen from the list that every road project was delivered. Of the 16 public transport projects only four were completed.

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.

WestConnex clearly fails to:

- Reduce car dependency
- Meet the needs of our growing suburbs
- Get more people on public transport

The Benefit-Cost analysis of WestConnex is evaluated over a 40 year period. Relieving traffic congestion on the corridor appears to be a major objective of the project. The project reaches capacity in the M4 East tunnel within eight years after project completion. This does not seem to be an effective means of relieving congestion. The Cost-Benefit analysis should include costs of additional measures required over the **remaining 32 years of the project life** to maintain the claimed congestion and travel time savings. If included, it is likely that the **project costs will significantly outweigh any benefits.**



14 Failure to meet the stated project objectives

I <u>object</u> to the Westconnex project in its entirety as the core objectives are not met.

Westconnex has key objectives that the whole project is supposed to meet.

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.**

Westconnex's stated objectives have no associated targets by which their achievement can be ever be determined. For example, how can it ever be determined if the objective to "maintain regional air quality" has been met?

Objectives/targets need to be:

1. Specific

2. Measurable
3. Achievable
4. Relevant
5. Time-bound

Even though the objectives of Westconnex have been contrived to fit the project, the **project still does not meet them**.

Each objective below is accompanied by an explanation of why the project does **NOT** meet that objective. *(Ed: We counted them and there are 40)*

1. **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.**

- There is already an extensive and high–capacity 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 economical 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.

2. Relieve road congestion to improve the speed, reliability and safety of travel in the M5 Motorway corridor.

- 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 a new equilibrium between supply and demand is reached (i.e., congestion will return to its previous level)
- A better objective would be to give as many people as possible a reasonable alternative to sitting in traffic. How many people would really prefer to spend hours each week crawling along a dark tunnel inhaling truck fumes, than sitting in a modern train that takes them swiftly to their destination, where they can use the time to relax, read, work etc.
- 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 (4) than without it (3) in 2021.**

3. Cater for the diverse travel demands along these corridors that are best met by road infrastructure.

There is already more than sufficient capacity along these corridors to cater for all the essential vehicle travel. Non-essential vehicle travel could be discouraged through better demand management, e.g., road pricing reform.

4. Enhance the productivity of commercial and freight generating land uses strategically located near transport infrastructure.

- 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 them

be relocated to less populated areas, where the transport costs and externalities are lower?

5. Fit within the financial capacity of the State and Federal Governments, in partnership with the private sector.

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).

6. Optimise user pays contributions to support funding in an affordable and equitable way.

- 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.

7. Provide for integration with other WestConnex projects and the proposed Southern extension, while not significantly impacting on the surrounding environment in the interim period

- There will be significant impacts on the surrounding environment.
- 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.

8. Manage tunnel ventilation emissions to ensure local air quality meets NSW Environment Protection Authority (EPA) standards

- 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.

9. Maintain regional air quality

- 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.

10. Manage in-tunnel air quality to stringent air quality standards

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.

11. 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:
    1. Providing for energy-efficient transport modes (public transport, walking, bicycling).

    2. Land use planning that places homes closer to employment and other destinations.

12. 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.

13. Provide for improvement of social and visual amenity

- The project will reduce social and visual amenity.
    1. The concrete interchanges and pollution stacks will be visually obtrusive.
    2. The increased traffic volumes on surface roads will result in lower amenity (more noise pollution, more fear and intimation, increased crash risk etc.).

    3. 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.

14. Minimise impacts on natural systems including biodiversity

- The project will cause irreversible biodiversity loss.
- The project will contribute to climate change through increased greenhouse gas emissions. This will result in further biodiversity loss and damage to natural systems.

15. Protect surface and groundwater sources and water quality including management of contaminated areas

- The project will result in increased VKT (Vehicle Kilometres Travelled) , and therefore more contaminants (brake and clutch dust, hydrocarbon particulates etc.) being deposited on roadways and washed into waterways.

16. Reduce susceptibility to, and minimise impacts of, flooding

- 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.

17. 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

- The project is not a sustainable development.
    1. Not economically sustainable. The costs far outweigh the productivity benefits.

2. 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.

3. Not environmentally sustainable. It will result in higher greenhouse gas emissions and irreversible biodiversity loss.

14.1 Enhance the productivity of commercial and freight generating land uses strategically located near transport infrastructure

14.1.1 Failure to meet this objective

Freight benefits are an integral part of the justification for WestConnex, yet the New M5 does not go anywhere near Port Botany. It should be noted that when WestConnex was first reviewed by Infrastructure Australia it was classified as a freight project.

As detailed in the below section, with the majority of Sydney's the population located in the Greater West it makes better sense to transport the bulk of freight via rail, such as the utilisation of the planned new distribution center planned for St Mary's.

It is concerning that the Southern Gateway ancillory project will impact on the Southern Freight Rail Line requiring it to be moved by 500 meters. No details have been provided to the public as yet, but based on the outcome in Newcastle it is reasonable for the public to suspect the worst of impacts for a period of time to this freight line.

14.1.2 Freight by rail projects by private sector

According to a recent SMH article alternate investments are being made to move freight more efficiently and cheaply by rail from Port Botany.

A recent announcement by Asciano aims to have a second freight hub transporting containers by rail to Port Botany within 12 months, as it prepares to spend $100 million building a new intermodal terminal in western Sydney. This new 43-hectare hub, will be located in St Marys which is claimed as an ideal location for big retailers such as Woolworths, Coles and Bunnings, which have distribution centres nearby. It will be Asciano's second intermodal terminal in western Sydney after Chullora. The Chullora terminal started transporting containers on rail to the port two months ago.

The new hub's rail shuttle will have annual capacity of 300,000, 20-foot equivalent units (TEUs) annually. Chullora has annual capacity of 600,000 TEUs, including up to 135,000 TEUs that can run on rail to Port Botany. Chullora is running some 75,000 TEUs annually on rail to Port Botany.

At full capacity, moving freight from Port Botany by rail from Chullora could take up to 100,000 truck journeys off roads every year, according to Asciano chief executive John Mullen.

A much-bigger competing freight terminal will be opened at Moorebank by logistics group Qube and rival rail group Aurizon in late 2017.

The distribution centres at both Chullora and Moorebank are better suited for distributions in the inner west. Mr Mullen stated that with "most of the distribution centre activity is further north-west" then it makes sense to transport via a cheaper and more efficient rail mode.

The WestConnex project will perpetuate an inadequate, antiquated and highly congested transport route that will not meet the needs of the freight transport industry and the people of Sydney and NSW. The Freight Industry recognises this, and have embarked on their rail projects that will better support Sydney's global economic corridor. Why does this Government and the RMS not recognise 21st century solutions to our congestion problem?

: http://www.smh.com.au/business/asciano-spends-100m-on-expanding-sydney-freight-hub-network-20151008-gk44qp.html#ixzz3oFxu8ITj

14.1.3 NSW Government has failed in aim to increase freight by rail

The NSW government has failed in its aim of moving an increasing proportion of freight throughout Sydney on rail, leading to more heavy trucks on the road. This outcome, which Roads and Freight Minister Duncan Gay concedes is a "slight embarrassment", comes amid rapid growth in the volume of goods and commodities being moved through Sydney's container port at Botany.

The state Coalition government wants to lift the share of containers moved through the port from 14 per cent to 28 per cent by the start of the next decade. This is a downgrade from the former government's target of 40 per cent, which it never got close to meeting. But over the life of the O'Farrell and Baird governments, the rail share of containers has remained stuck at about 14 per cent. Asked about the failure to lift the share at budget estimates about the failure to lift the share, Mr Gay said: "We believe we will do it, but we are a long way off at the moment."

Mr Gay attributed the failure to move a larger share of goods by rail to improvements in truck access to the port, which started under a program set up by former ports minister Joe Tripodi.

"It is success in one area that has stopped progress in another," Mr Gay said.

The executive general manager of NSW Ports for planning and infrastructure at NSW Ports, Marika Calfas, attributes the number of trucks due to the lack of terminals to transport containers by rail, and to a lack of regulation. "We need the facilities out there to increase capacity," Ms Calfas said. "We need to be able to take the boxes somewhere."

14.1.4 Decades of underinvestment in freight rail

Tony Abbott - in his 2009 book *Battlelines*, the "humblest person is king in his own car". He went on to dismiss outright the practicality of public transport in Australia's sprawling cities: "Mostly, there just aren't enough people wanting to go from a particular place to a particular destination at a particular time to justify any vehicle larger than a car, and cars need roads."

Despite this assertion, the new Sydney motorways partly funded by the Road-focussed Abbott government are being built in the most densely settled parts of Sydney. The NorthConnex and WestConnex involve building very long tunnels. All are likely to ignore the safety recommendations from the coronial inquest by Judge Jennifer Coate into the three-truck pile-up inside Melbourne's

Burnley tunnel in 2007. Between them, the projects involve more than 23 kilometres of new tunnels. Coate urged governments to build tunnels with dedicated emergency lanes and to eliminate the need for lane-changing, but the NSW government has shown that such features won't be included.

The relentless rise of heavy vehicles in Australia's transport system over the past four decades has occurred in part because Australia has no proper charging system, and because governments have starved the publicly owned rail-freight system of investment. As a result, rail's share in moving the goods that Australians buy every day has steadily declined, while the volume of road freight has increased almost tenfold over the past 40 years, to 203 billion tonne kilometres.

This development is in marked contrast with the situation in the United States. The US still moves about 40% of its intercity freight via rail. The US rail system is one of the most efficient in the world, and it is also profitable. It's such a good business that the shrewd investor Warren Buffett recently sank $US26.5 billion into buying a rail company.

Australia's shift to the roads has locked us into a freight system that is inherently more costly, more carbon intensive and more dangerous. Figures published by the federal government's Bureau of Infrastructure, Transport and Regional Economics (BITRE) show that the cost of moving 1 tonne of freight by road over a distance of 1 kilometre (known as cost per tonne kilometre) is 7.5 cents for road, more than double the 3.5 cents for rail. The greenhouse-gas emissions for road are more than triple those for rail: 52 grams per tonne kilometre versus 15.

This road-dependent freight system also means that Australia's cost of living is much more exposed to oil price rises. The carbon-intensive nature of the system makes it vulnerable to any future moves to introduce international trading systems or other regulations for greenhouse emissions.

There's also road dependency's cost to human life. In the five years to 2011, the average number of fatalities from Australian road accidents that involved a truck of more than 4.5 tonnes was 239 a year. The comparable number for rail, including passenger trains, was 34 deaths a year, which is remarkably low given that rail moves greater tonnage than road when bulk commodities such as minerals and grain are included. This means that trucks cause around 20% of all road fatalities in Australia even though they make up only 2.5% of the vehicles on the road. The number of people injured in such accidents continues to rise. In 2008–09, the latest year for which injury data is available, 1536 people were hospitalised after accidents with trucks. Accident victims classified as suffering a "high threat to life" totalled 551 in 2008–09, an increase of 18% in eight years, according to a 2014 BITRE report.

BITRE predicts a further 50% rise in the number of trucks on our roads over the next 15 years. Despite the urgent need for policy action, the wheels of government are moving slowly.

Two key reforms would give Australia a less costly, less dangerous and more climate-friendly freight system, and they are related. The first is distance-based charging for heavy vehicles, and the second is the construction of an inland rail line between Melbourne and Brisbane, which would avoid Sydney's notorious congestion and the 19th-century coastal rail line.

Trucking has become so dominant that even the trucking companies are saying that it's in their interest to shift more freight onto rail. Fox and his company executives declined to answer a series of questions put to them, and Abbott would not comment on his relationship with Fox. But back in 2009, Fox broke ranks with the industry, and the Abbott view, and said Australia had to shift back to rail if it were to have a viable freight system.

"I'm talking against myself when I'm talking about putting things on rail," Fox told a forum at the National Press Club. Fox backed the inland rail line, but he also advocated making greater use of coastal shipping, transferring more of Sydney's trade activity to Newcastle or Wollongong, and shifting Melbourne's major port to Hastings on the Mornington Peninsula. In the early '70s, about one-third of the freight moved between Victoria and Queensland went by sea, but that has now fallen to nil. He said Australia could learn a great deal from China, which has built deep-water ports away from major cities. "We do need to move away from running transport operations in the centre of the city, particularly on the east coast of Australia."

Fox expressed what might be the vain hope that he would see **sensible reform** happen in his lifetime: "We're only here for a short time. I've got probably less than ten years to go. I'd certainly like to see some of these things that are in the **interests of the nation."**

Without the NSW Government investing in the right infrastructure , ie to invest in a more efficient movement of freight around our state and country – instead of the antiquated and polluting motorways, our country will continue to decline in profitability.

http://www.smh.com.au/nsw/more-trucks-on-sydney-roads-as-government-fails-to-hit-rail-share-targets-20140921-10jyab.html#ixzz3pDnELmvV

https://www.themonthly.com.au/issue/2014/december/1417352400/paul-cleary/roads-nowhere

14.2 Fit within the financial capacity of the State and Federal Governments, in partnership with the private sector

14.2.1 Failure to meet this objective

The WestConnex motorway is the wrong transport project for Sydney's future, a report commissioned by City of Sydney Council says.

The report argues the WestConnex motorway is unlikely to reduce traffic on local roads, exposes the taxpayer to huge financial risk, and will not benefit many western Sydney commuters. Journey-to-work figures analysed by SGS show only about four per cent of workers in suburbs such as Penrith, St Marys and Camden travel to the CBD. Moreover, about 90 per cent of these work trips to the CBD from the west are using public transport.

SGS's report also says “WestConnex shares characteristics with other motorways that have financially failed, such as the Lane Cove Tunnel, Cross City Tunnel and Clem 7 in Brisbane, exposing the taxpayer to risk”.

Principal of SGS Terry Rawnsley said a metro rail line along Parramatta Road between Westmead and Central would be a better fit for the city than a new motorway.

"It's the biggest transport project in Sydney's history and you want to be sure it is going to be an economically viable project. There's a lot of questions that someone needs to answer."
http://www.smh.com.au/nsw/nsw-state-election-2015/westconnex-the-wrong-project-for-sydney-report-says--invest-in-public-transport-instead-20150223-13m8f0.html#ixzz3ooycRRlG

I consider 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

It is reasonable for the Public to be very concerned about the financial viability of this project. Already the cost has blown out from $10 Billion to $16.8 Billion. It is apparent that the NSW Government is continuing to throw more and more money at the project, as traffic modelling continue to reveal that the project will not address Sydney’s congestion issues.

I reject the entire WestConnex project on the basis that the expected cost benefit ratio is less than the dollar and thus a waste of our NSW taxes.

15 Traffic Assessment

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 (area that is analysed) 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 (signals to regulate flow onto the ramps) 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.

16 Comments on specific sections

(The references here are to sections in Appendix G)

a) Appendix G, Section 3 Strategic Context 4.2.1

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); asingle 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.

b) Appendix G, Assessment methodology, 4.2.2

- 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. What toll prices have been assumed?
- The study 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.
- **Insufficient detail on the Value of Travel Time Saving (VTTS)/Willingness to Pay (WTP) model:**
    1. What are the form and parameters of the model?
    2. If it was based on stated preference surveys, then how has the issue of hypothetical bias been addressed?

3. Has the model been validated? Previous toll choice models in Australia have overestimated WTP for toll roads.
4. Does the model include the negative utility of the tunnel environment (monotony, no natural light, poor air quality)?
5. What value of WTP has been used in the WRTM?
6. What is the confidence interval around the WTP value used?
7. 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.

- **Why has the weekend period not been modelled, when current weekend traffic volumes are higher than weekday traffic volumes in some places?**
- **Insufficient information about the travel zone structure in the Westconnex Road Traffic Model (WRTM)**
    1. What are the travel zones based on? How big are they?
    2. How are intra-zonal trips modelled?
    3. How are trips to/from external zones modelled?

- **Induced demand has not been adequately addressed.**
    1. 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/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 my 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.

- **Insufficient detail on origin-destination demand matrix generation:**
    1. What are the form and parameters of the generalised cost function?
    2. How were shortest paths calculated?ion:
- **Insufficient detail on trip generation:**
    1. What are the form and parameters of the trip production function, and how was it estimated?
    2. What are the form and parameters of the trip attraction function, and how was it estimated?
    3. How were trip productions and trip attractions balanced?
- **Insufficient detail on trip distribution/modal split:**
    1. What are the form and parameters of the gravity model used?
    2. What are the form and parameters of the deterrence function used?
    3. How has modal split been estimated?
- **Insufficient detail on road traffic assignment:**
    1. Is assignment stochastic or deterministic?
    2. What link loading/flow function was used? What parameters were chosen?
    3. Were intersection delays included?

- **Insufficient detail on public transport assignment:**
    1. How were access and egress points determined?
    2. How were route strategies determined?

- **Non-motorised trips (pedestrians, cyclists) were not included in the WRTM or LinSig modelling. (**LinSig is a traffic modelling package for the assessment and design of traffic signal intersections, either individually or as a network that comprises of a number of intersections.**)**
- **Impacts on accessibility have not been modelled/assessed.**
    1. Most transport is not an end in itself – it is a means to access work, education, services etc. How does the project affect accessibility?

- **Equity and equality impacts not described.**
    1. How many people have better accessibility with the project?
    2. How many people have poorer accessibility with the project?
    3. Do benefits/impacts accrue to any population groups more than others, e.g., people with a disability or on low incomes?

- **Downs-Thomson Paradox is not considered (*Ed: According to the Downs-Thomson paradox, improved road capacity increases travel times because it attracts more users to the road and away from public transport.)***
    1. The project will attract passengers away from public transport to driving. 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.

- **No sensitivity analysis. (*Ed: The parameter values and assumptions of any model are subject to change and error. Sensitivity analysis , broadly defined, is the investigation of these potential changes and errors and their impacts on conclusions to be drawn from the model.)***
    1. 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?

c) Section 7 Assessment of construction impacts 4.2.3

- **Impacts on travel times for all modes (driving, public transport, walk and bicycle) have not been assessed/reported. The construction activities (*Ed: in some cases over three years*) will delay travellers in a number of ways:**
    1. Additional construction/workforce traffic.
    2. Temporary road and lane closures.
    3. Speed limit reductions.
    4. The 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. (*Ed: The M4 East construction period coincides would coincide with the New M5 project if approved)***

d) Section 8 Future conditions without the project

- **Has the impact that the forecast decreases in LoS will have on travel demand been fed back into the demand model? The decreases in LoS will reduce travel demand by influencing a number of long and short term travel choices:**

1. Home location choice;
2. Work location choice;
3. Destination choice;
4. Mode choice;
5. Departure time choice; and
6. Route choice.

As such, it is unlikely that the future 'do minimum' scenarios will be as bad as claimed. We know that congestion is self-limiting – as LoS declines, travellers will adjust their travel behaviour/choices to avoid congestion.

- **Tables 69, 70, 74, 75, 77 and 78 do not include the base year (2012) values, so the future 'do minimum' scenarios cannot be compared with current conditions.**

Table 79 WRTM screenline comparison between 2021 'without project' and 'with project' AWT volumes

Direction	Location	2021 'without project'	Share	2021 'with project'	Share	Change
Western Screenline						
Eastbound	Canterbury Road	23,643	22%	25,688	24%	9%
	M5 East Corridor (including M5 East Motorway and New M5)	57,764	54%	50,104	47%	-13%
	Stoney Creek Road	13,549	13%	19,230	18%	42%
	Forest Road / Queens Road	12,218	11%	12,108	11%	-1%
	Total	**107,174**		**107,129**		**0%**
Westbound	Canterbury Road	24,206	22%	25,895	24%	7%
	M5 East Corridor (including M5 East Motorway and New M5)	58,125	52%	48,424	45%	-17%
	Stoney Creek Road	13,496	12%	17,068	16%	26%
	Forest Road / Queens Road	16,513	15%	16,692	15%	1%
	Total	**112,340**		**108,079**		**-4%**

Ed: Where is the baeline? What are current conditions? Note also the shift in traffic to Stoney Creek Road that is already congested

- **Tables 72, 73 and 76 use 2014 as the base year, instead of 2012 as used elsewhere in the EIS. To understand the impacts of the project, a consistent baseline must to be used.**
- **An assessment of the impacts on walking and bicycle demand and travel times has not been provided.**

e) Section 9 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.

f) Section 10 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,

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/reported. Only performance measures for the immediate area around the St. Peters Interchange have been reported. Without this information, the
- An assessment of the impacts on walking and bicycle demand and travel times has not been provided.

References

1. Newman P, Kenworthy J. Costs of automobile dependence: global survey of cities. *Transp. Res. Rec. J. Transp. Res. Board* 1999;1670(1):17-26. doi:10.3141/1670-04.

16.1 Optimise user-pays contributions to support funding in a way that is affordable and equitable

16.1.1 Failure to meet this objective

WestConnex perpetuates car dependency.

I certainly do not have an issue with tolls or congestion taxes – but you must have a decent integrated public transport solution available first. Initiatives contained in the NSW Transport Master Plan (ignoring the retrofitted and contradictory westconnex) and Eco Transit Sydney would have enlivened the ability for people to get from A to B without via Central. Recent examples of the popularity of public transport – Gold Coast Tram. Green Square & Mascot stations once fares were reduced to standard and inner west light rail

WestConnex means that families in the West will need to find $100 - $200 per week to travel to work. Yet I – with public transport & Opal – pays $33.60 per week giving me free travel 3 days per week.

This is inequitable. Greater Sydney will continue to be in congestion – but now have to pay.

The New M5 means that our local roads will be awash with additional induced traffic, that are avoiding the tolls.

On this basis, I reject the entire WestConnex project in its entirety as it does not meet the objective of fair and reasonable access to transport for Greater Sydney.

16.2 Integrate with the preceding and proposed future stages of Westconnex, without creating significant impacts on the surrounding environment or duplicating any potential issues across the construction periods

16.2.1 Failure to meet this objective

There are large sections in our community that will endure up to 10 years of construction (destruction) in their community with 24/7 activity.

The EIS provides no mitigation or solution (apart from counselling).

10 years is a significant impact on a highly populated sections of the populace and should have been given greater weight for reasons not to proceed with WestConnex.

The myriad of road works – The Southern Gateway, Southern Extension, and complementary road works means our communities will endure long term construction for no benefits.

The lack of any evidence contained in the EIS on how this objective can be met, but anecdotal evidence proving otherwise, I therefore reject the WestConnex project in its entirety. This is a highly destructive and intrusive project for over one million people. That is not a 'few cracked eggs'

16.3 Protect natural and cultural resources and enhance the environment.

16.3.1 The WestConnex project does not meet this core objective

Features of the M5 East project include: Widening roads; unfiltered exhaust stacks close to homes, schools and aged care centres; destruction of trees; temporary and permanent loss of greenspace; induced traffic onto local roads; impact on wetlands, groundwater and endangered species; exposing residents to prolonged high impact acute noise 24/7; hundreds of significant truck movements a day impacting on the safety of residents particularly primary school children; isolation; community dislocation; car dependence.

None of these factors enhance the environment. In fact, this proposal has a very significant negative impact on the urban and natural environment where over a million people.

16.3.2 Sectional planning approach

I **object** to the sectional planning project approach to the 33 kilometre Westconnex motorway. This prevents serious consideration of the impacts of the larger Westconnex project. **While broad justifications for the whole project are used to justify local threats, there has been no overall analysis and evaluation of the environment threats from the whole project.**

16.3.3 Social Impacts

- Hundreds of homes 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.
- There is growing scientific evidence that excessive noise can damage short and long term health
- Road pollution is a significant contributor to overall pollution; living or working close to congested roads is a health risk; some roads that would be negatively affected by the Westconnex New M5 are already polluted.
- There is strong scientific evidence that air pollution, especially PM 2.5 and PM 10 are linked to increased risks lung disease, impaired lung development, strokes, cancer and other forms of respiratory illness.
- The EIS acknowledges that Stoney Creek Road, King Georges Road, Campbell Street Euston Road Alexandria and other roads will become more polluted. In some cases, air pollution is already at unhealthy level.
- Instead of tackling the issue of Sydney's pollution, the Baird government is planning tollway after tollway for Sydney. This will leave many people, especially those in Western Sydney, in a car dependent situation. This is unhealthy.
- Leightons/CIMIC, who have been awarded the contract before approval, decided that ventilation stacks should not be filtered although tollway projects in other countries have ventilation stacks which filter emissions. The EIS asserts that there will be very low ' negligible' emissions in local areas from the stacks. One reason engineers give for filtering tunnels is to protect residents in high buildings or land. In this project, some residents live on hills (Kingsgrove) and others (e.g. in Arncliffe) live in high buildings. There are experts who say that stack emissions are not safe and should be filtered.

- Increases in traffic will spill over into other roads and streets but because the traffic modelling only extends to two intersections past the boundaries of the Westconnex project, these increased levels have not been modelled or presented in the EIS.

As well, the assessment of air quality and noise impacts are completely dependent on the traffic modelling. The traffic impacts are uncertain and for this reason, **the air, noise, social impacts and health risk assessments cannot be regarded as reliable.**

Air concerns [redacted] protest at McCallums Hill Primary School about the WestConnex project. Picture: Chris Lane

These children will be exposed to elevated levels of dust and pollution at home and school. A construction zone a few metres from their home. Heavy truck movements past their school. Four trucks every minute during off-peak. And on completion, exposure to dangerous unfiltered exhaust from the chimney stack.

16.3.3.1 Home acquisitions

Home Owners (reported in the media) claim that lower than market value is offered for their homes and that they are bullied by RMS staff. Longstanding communities members are being forced to move far from their social networks.

Renters are also having to seek legal advice for relocation compensation. One long term renter in the same home for 18 years was only offered $5000 to relocate.

The disadvantaged residents in social housing (including independent homes for people with special needs) of RMS property have not had their needs addressed in the rush to evict hundreds of people from their homes.

Most of these people forced from their homes will likely find they have to move some distance away from where they have established support networks. This would be particularly hard on the frail and elderly.

I object to the mitigation of offer of 'counselling' which even if it does exist (and some say it has not been offered to them) would be of little assistance.

16.3.3.2 Unsafe Removal of Asbestos**.**

This dangerous substance has been located in several locations across the Westconnex project already. There is evidence that trucks removing asbestos have not been following appropriate safety standards such as sprinkler systems, washing down trucks before departure, and neglecting to properly cover loads.

I object to the contempt Westconnex has shown for the health and safety of residents within the locations and on route to Erskine Park where soil contaminated with asbestos has been dumped without being wetted or properly covered at the time of disposal.

The asbestos strongly suspected in the Earth Mound at Kingsgrove is a significant concern to all.

16.3.3.3 Divisive Infrastructure

I object to a 'solution' that results in a dreadful outcome on the amenity for all impacted suburbs. A wide, dirty and noisy toll road and the spaghetti interchanges thrust through suburbs that form part of Australia's 19th and 20th century history including the destruction of heritage listed homes and historic buildings.

16.3.3.4 Mental Health

The stress imposed on people by the Westconnex will increase the likelihood of anxiety and depression. The grief people will experience watching the suburb and urban landscape they love permanently destroyed has not been sufficiently addressed in the EIS social impact statement.

The permanent impact of this toll road on thousands of people's physical and mental health through

- visually divisive spaghetti interchanges
- noise barriers -that we know little care to landscaping for residents will be addressed –ref M5 KGR landscape design aka bare noise walls
- prominent and unfiltered exhaust stacks a constant reminder that residents and workers and their families are being poisoned by high levels of pollution
- loss of accessibility by pedestrians and cyclists
- impacts on the elderly for mobility, safety, connectivity and isolation
- impacts to the community and schools with the loss of neighbours
- impacts on the significant number of people forced to leave their home and community – loss of social networks and loss of school mates.
- stress and anxiety brought on by living in a permanent high noise and highly polluted environment.

16.3.3.5 Social Infrastructure

Stated mitigation - Landscaping treatments for the benefit of residents. Let's revisit the landscape design of the King Georges Road Interchange – hundreds of metres of bare noise walls because it is easier for the maintenance crew to inspect. Never mind the residents or professional pride or genuine appreciation for the huge disruption caused to residents. Ugly bare walls.

I object to the likely outcome facing residents of the landscaping treatments being a typical, visually divisive structure.

16.3.3.6 Loss of vegetation

I object to the loss of any vegetation planted as part of the rehabilitation/landscaping works following the construction of the Westconnex motorway. I have often been forced to travel on the M4 between the Sydney and the Blue Mountains. Over many years, I have watched side vegetation grow and provide visual relief, shade and refuge. I object to watching this vegetation being torn down, especially as once upon a time, the construction of the M4 motorway was then supposed to be the

answer to Sydney's east/west transport problems. I object that this existing motorway vegetation is seen to have no real value within the EIS.

I object to the destruction of significant tracts of parks and trees for the New M5.

I object to the impact upon the habitat of birds and animals which live, forage and shelter amongst the vegetation and trees to be lost due to the construction or operational needs of the project.

16.3.3.7 Car Dependence

Build a city for the people – and they will come. Build a city for cars – and congestion will prevail.

Ironically, it is these suburbs – targeted for destruction by Westconex – that demonstrates what the NSW Govt should be the planning for new outer suburb communities. The walkability factor - with ready public transport and local shopping centres. Local employment opportunities or employment centres (including high value jobs) within 60 minutes by public transport. Shared community spaces for gardening and leisure and social connectivity. Cultural and entertainment facilities for all ages.

The infrastructure planning for the new western suburbs, such as near Camden is woeful, with only 7% of Camden residents using public transport. Westconnex promotes socially isolating car dependence and the environmental impact of ever increasing traffic noise and air pollution – and does not provide residents of the western suburbs with any relief from congestion.

I object to this proposal as it is the wrong project for the wrong time.

16.3.3.8 Biodiversity and natural environment

Australia has the notorious distinction of having possibly the worst extinction record on earth according to Richard Kingsford, professor of environmental science at the University of NSW. This is predicted to continue without serious changes to the way we conserve our environment

16.3.3.9 Biodiversity effects are defined narrowly in focusing on potential impacts on Threatened Species.

Methodology and EIS statements re "the highly modified nature of the project footprint"

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.

The EIS field surveys (observations in the field) are very limited in duration and season (as usual in an EIS) – the "short duration of surveys" is acknowledged as well as **"it is possible that seasonal**

species were not identified"(20-3): for this EIS it was 1 day (12/2/15: no number of hours specified) and one night (27/2/15: also no duration specified) in one area (not specified where), with additional surveys on 12/3/15 and 26/6/15 "to investigate areas not covered by the previous surveys" (20-3). (It is not specified where if a physical location is referred to, nor whether it was day or night, and the duration).

Repeated sampling over some time period is really needed to develop anything representing a comprehensive survey. And if you are not (inclined to be) looking for it, you don't tend to find it, and if you are quite time limited as all EIS's are, you are falling well short of what is a satisfactory, let alone a rigorous survey process.

16.3.4 Endangered Fauna

16.3.4.1 Green and Golden Bell Frog

THE endangered Green and Golden Bell Frog is under threat as secret plans to build the WestConnex toll road through one of its last remaining habitats were quietly lodged to avoid public scrutiny.

The Green and Golden Bell Frog was once the most common frog species in the Sydney region but it now reduced to only two secure populations in the Sydney region – Kogarah and Homebush

The proposed development for WestConnex occupies the same area as the Green and Golden Bell Frogs on Kogarah Golf Course. Out of the seven locations where they 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. Further the only two locations that are not impacted only supported small numbers of frogs. 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.

Scientists are studying several species of Australian frogs - including the endangered green and golden bell frog - whose skin secretions are toxic to the multi-drug-resistant golden staph know as MRSA. The GGBF secretions may be the wonder drug of the 21st century. Yet, the overall WestConnex project will more than likely be responsible for the extinction of such an important species, as part of the M5 East section.

THE endangered Green and Golden Bell Frog is under threat as secret plans to build the WestCONnex toll road through one of its last remaining habitats were quietly lodged to avoid public scrutiny.

16.3.4.2 Rare Grey Headed Flying Fox

The EIS acknowledges that **Grey-headed Flying-foxes (GHFF)** use the area when foraging for food. An evening field study, consisting of two evenings only, confirmed this.

The project footprint is well within the nightly foraging range of the Clyde/Duck River camp, as well as other urban Sydney GHFF camps.
Urban GHFF camps have become important to the survival of the species which is now classed as Vulnerable under Federal and State legislation.
Neither street trees nor private garden trees have been included in loss of area calculation (see more on this below). Trees in these "unaccounted for" areas can be and are very important food resources for GHFF feeding.

This foraging habitat should have been quantified in their assessment and their conclusion re GHFF foraging habitat impact. As a result the area and significance of foraging habitat has been understated. On 20-16, the EIS states that "These planted trees do not constitute habitat critical to the survival of

the Grey-headed Flying-fox."

As there is currently no declaration by either the NSW or Federal Government as to what constitutes critical habitat this statement is disingenuous.

Stating under the heading Cumulative Impacts (20-20) that the combined Westconnex projects would result in "the removal of mainly planted vegetation and associated fauna habitats" (20-20) is not an adequate assessment of the whole Westconnex's project impact on Grey-headed Flying fox foraging habitat.

This species in its increasingly urban environment relies on much planted vegetation. Indeed the number of urban camps now in the Greater Sydney area is a result of the available food provided by such urban planted landscapes in proximity to camps – themselves also located in some cases amongst planted vegetation, especially as suitable habitat elsewhere in the species range has significantly contracted since European occupation (estimated at 50 % loss: Eby,P).

The whole Westconnex project – combined M4E and New M5 will impact on urban GHFF foraging habitat to a significant degree.

Grey Headed Flying Fox by Andrew Meares

16.3.4.3 Eastern Bentwing Bat

The impact on this species will be the loss of foraging habitat and the disturbance of roosting sites. Again, as similar to all of our native animals within Sydney metro, the significant and continued loss of vegetation will have a serious impact on these local communities.

16.3.4.4 Micro – bats (Large-footed Myotis and Eastern Bentwing Bat)

Given the very limited field surveys undertaken and poor quality recording of calls during these, the EIS cannot substantiate claims about the extent of use of existing infrastructure as roosting sites, nor claims about breeding habitat. The EIS claims there is no breeding habitat in the study area, but a breeding habitat can also include roof and wall cavities in the absence of tree hollows.

Nor is there substance to the claims about re-colonising new roosting sites eg. continuing to use culverts post construction disruption (20-16). There is no evidence quoted to indicate this will happen.

16.3.4.5 Statement that vegetation connectivity is limited

Some animal species manage quite well in small and fragmented patches, 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. Given the EIS has not quantified nor assessed the ecological role of private gardens and street plantings (see above), EIS comments about connectivity do not tell the whole story and so the potential connectivity (and ‘stepping stones’) that exist via this vegetation is ignored.

16.3.4.6 Cooks River Castlereagh Iron Bark bushland

Another cumulative impact on our natural environment, with the loss of a critically endangered stand, a development condition of the first M5, will be destroyed.

Threatened Flora - **Cooks River Clay Plain Scrub Forest**, located north of the M5 East Motorway, was significantly impacted by the original M5 construction. The remnant remaining is in good condition and is used by the Grey Headed Flying Foxes for foraging.

The Scientific Committee, established by the Threatened Species Conservation Act, had made a final determination to list the Cooks River Clay Plain Scrub Forest as an ENDANGERED ECOLOGICAL

COMMUNITY on Part 3 of Schedule 1 of the Act. Listing of Endangered Ecological Communities is provided for by Section 12 of the Act. (THREATENED SPECIES CONSERVATION ACT 1995 No 101)

Noted by the Scientific Committee that they are of the opinion that Cooks River/Castlereagh Ironbark Forest in the Sydney Basin Bioregion is likely to become extinct in nature in New South Wales unless the circumstances and factors threatening its survival or evolutionary development cease to operate and that the community is eligible for listing as an endangered ecological community.

The community had worked hard to save this from M5 version 1.

16.3.4.7 Rosecomb – at Wolli Bush found

Some months back, Fungi displaying a rare abnormality linked to vehicle pollution have been found near the existing M5 emission stack at Turrella.

Joanna Robinski of WCPS likens Rosecomb to a dead canary in a coalmine. "Finding Rosecomb is another wake-up call for local residents," she said. "Since 2012, when the World Health Organisation upgraded the status of diesel fumes to the highest level of human carcinogenicity, we've had confirmation of the ill-effects of pollution. This provides further evidence that living alongside emission stacks negatively impacts the biota of our environment as well."

The abnormal fungi – found only near the stack – needs further assessing.

16.3.4.8 Ramsar Wetlands

Wetlands provide significant economic, social and cultural benefits. They are important for primary products such as pastures, timber and fish and support recreational and tourist activities. Wetlands also help reduce the impacts from storm damage and flooding, maintain good water quality in rivers, recharge groundwater, store carbon, help stabilise climatic conditions and control pests. They are also important sites for biodiversity.

Wetlands cover about 9% of the earth's surface and are estimated to contain around 35% of global terrestrial carbon. Wetlands act as sinks for carbon dioxide and other greenhouse gases, especially if their vegetation is protected and their natural processes are maintained.

Without biodiversity the variety of all life forms, local ecosystems and in turn, human societies, cannot survive. Although highly urbanised, the City has retained several small **bushland** and **wetland** areas which play an important role in terms of providing food, habitat and shelter for native animals. These areas are deemed to have 'conservation value' (meaning they are worth preserving for future generations) because they represent ecosystems that would otherwise be lost.

The proposed F6 extension (which is referred to as a given in the EIS although it is not even in early stages of planning) will likely also impact on the Rockdale wetlands – another significant loss to our natural and human environment.

I object to the sectional approach taken to the Westconnex project which makes it difficult to properly assess the cumulative impact on our wetlands across both Westconnex and Southern Extension

I object to the unwarranted destruction of what remains of our natural environment for a project which is managed by politicians and business people who continue to hide the business case on which it is based. Westconnex managers have been unable to properly debate or refute the many informed critiques of the project.

16.3.4.9 Conclusion

In an age of shrinking backyards and an ever-increasing urbanised metropolis these remnants of natural spaces and parks are much more than sanctuaries for our native wildlife and remnant flora -

they are places for individuals, families and groups to play, relax and to simply enjoy the wildlife and flora that exist in these spaces. These places have important cultural and social significance, and they need our protection. Climate change, greenhouse gas emissions and noise pollution further strengthen the argument that building more motorways is not the right direction to take.

Our aim is to give our natural spaces a voice, and to lobby State, Federal and Local governments to protect them for wildlife, for our community and for future generations, and to propose sustainable transport options rather than freeways.

Is the cost and destruction to endangered fauna and flora, hectares of parks, air quality and loss of many homes and businesses worth a one kilometre per hour speed increase (source KGR M5 eis pg 'v')?

16.3.5 Flooding

During construction, there is the potential for local catchment runoff to enter project excavations at the interchange locations and impact the construction ancillary facilities. Construction activities also have the potential to exacerbate flooding conditions in adjacent developments. The mitigation stated are physical barriers designed to protect the works areas and tunnel entries so as not to increase flooding conditions in adjacent areas. The public needs full independent advice on the safety of the tunnels which is not possible in the short period allowed for consultation.

16.3.6 Urban Salinity

I am concerned about the potential for salinity damage that can shorten the life of urban infrastructure such as roads, buildings, water and sewage pipes. This leads to costly maintenance and repair by homeowners and councils.

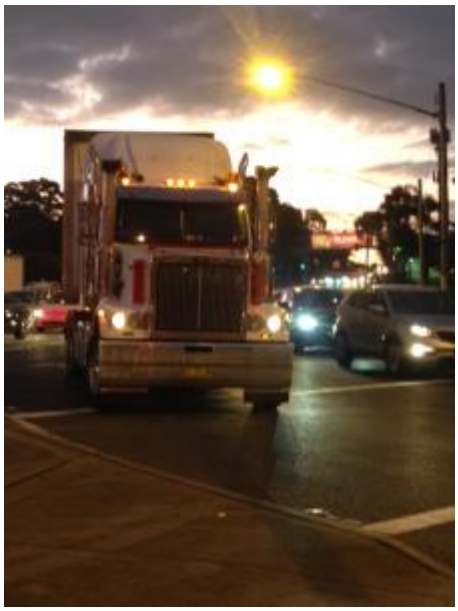
The movement of excess water and salt in parks and gardens can affect plant growth and cause plant death. Sports grounds and recreation areas affected by urban salinity may become bare, unattractive and unusable. Soil properties can be altered significantly making it hard to revegetate these areas.

Pockets of native vegetation in and around urban landscapes may also be affected. This can have serious consequences including the disappearance of native flora and fauna and poor downstream water quality.

I am concerned about the impact of groundwater and the potential for increased risk of flooding due to the reduction of greenspace.

The public needs access to more independent technical information so that they can understand the true impacts of the project.

I conclude that Westconnex comprehensively fails one of its claimed core objectives - *'Protect natural and cultural resources and enhance the environment'* is not met by the Westconnex project.



Residents studying the EIS while questioning the legality of early drilling in Haberfield

17 The project represents lost opportunity for better transport investment

As mentioned earlier, it is a tragedy for Sydney and NSW that the rational initiatives put forward by Ms Berejilian in the NSW Transport Master plan have been cast aside for this flawed project.

Alternatives that would have been regarded as long term assets as put forward by EcoTransit in their recent newspaper :

- Parramatta – focused light rail network.
- Modernise rail signaling to increase increase capacity
- East – West Translink – extending light rail network from Dulwich Hill through to the Airpor using unused rail space
- Kinsgrove "Last chance" Park & Ride
- Retrofit two extra stations at Airport Line
- Buyback the Airport line and reduce train fares to standard rates at the Airport stations and also removing the anti-competition clause
- Sydney-Newcastle rail line upgrade (stage 1)
- Parramatta Road Light Rail (CBD to Olympic Park)
- White Bay GreenLink
- Cycling storage at selected stations to complement a rail and ride concept
- More rail capacity and frequent services for the Western Sydney Rail Line

- Pippita Express Solution using spare rail space

The combined cost of all of these projects come in significantly less than $15 billion and would make a genuine dent in the problem of road congestion. These projects particularly would soak up much of the single passenger vehicles off the M5 and M5, clearing the road significantly for tradies and freight.

The science is clear – **Faster road network speed depends on faster public transport**. Take for example the recently built Gold Coast Tram. Patronage on the tram was delightfully beyond expectations. As a result, the performance of the parallel Gold Coast Hwy also significantly improved.

This is genuinely a tragedy to Sydney and NSW, particularly taking into account the WDA boast contained the King Georges Road M5 interchange (page v in volume 1) that "Sydney's network will improve by one kmph on completion of the entire project". Wow. Or more to the point, rather an underwhelming outcome.

I therefore reject the WestConnex project in its entirety, as it represents a tragic loss to the people of NSW in honestly addressing the congestion issues of Sydney.

18 The project fails justification that it is in the best interests for the public

I reject the WestConnex project in its entirety, as public health and wellbeing has been completely disregarded. This is a huge gamble on people's health, and the future funds to cover medical costs.

18.1 Health Impacts Summary

- This Human Health Risk Assessment is not accepted as a reliable study of the health risks of the WestConnex project
- This assessment has several serious flaws, but the key one is that it is not independent. It relies completely on the findings of the Air Quality Impact Assessment (Volume 2B, Appendix H), which in turn relies on the WRTM traffic forecast model. It does not question, in any way, the findings of the Air Quality Impact Assessment, thus does not assess the health risks of the very real potential for induced demand on Parramatta Road.
- Both NO2 and PM2.5 levels are already elevated and above guidelines in many of the localities within the project area, so any additional traffic due to induced demand (in tunnels or on surface roads) will add to this situation.

- This risk assessment does not point out that the air quality standards or guidelines used in the EIS may be superseded by stricter ones at the end of 2015 when the new National Environment Protection (Ambient Air Quality) Measure (NEPM) standards are passed
- A truly independent health risk assessment would have concluded that peoples' health was already being compromised in this corridor, and that further "hot spots" are going to be created by the project and that the relevant government authorities should be taking action about it, including by urgently implementing the National Clean Air Agreement.
- Other cleaner forms of transport are required in this corridor.
- Diesel fuel vehicles need to be phased out quickly, as is happening in France and proposed in other parts of Europe.

18.2 The Westconnex/AECOM Human Health Risk Assessment reaches the following overall conclusions

- The tunnel doesn't need filtration as there will be negligible pollution at the portals and the ventilation stack will disperse pollutants across the air-shed with negligible effect on local residents
- A detailed assessment of two key pollutants (nitrogen dioxide – NO2 – and particulate matter measured in microns – PM10, PM2.5) is required, given their known associated health effects and the impacts of their co-exposure (common in urban environments) and the known main source of PM2.5 (and finer) in the urban environment being vehicle diesel exhaust
- Potential health impacts associated with changes in air quality (specifically NO2 and PM) within the local community was assessed as low and essentially negligible
- There are some residents who will have an increased exposure to PM as a result of the redistribution of emissions from surface roads
- There are some residents who will be exposed to less PM2.5 as a result of the project
- Summary of mortality data for three key factors (COPD, lung cancer, cardiovascular disease) indicates that Sydney Area Health Service has rates higher than the average NSW rate for all three indicators; summary of hospitalisation data for key factors (asthma, cardiovascular disease, COPD) shows asthma rates similar to NSW and cardiovascular disease and COPD less than NSW rates (possibly accounted for by high GP service level in Inner Sydney)
- Increases in population (and its distribution) of the suburbs within the project footprint will have no impact on the health outcomes

- The time spent exposed to pollutants within the tunnel is very short (minutes) and in the absence of published guidelines for NO2 and PM within tunnels, advises keeping vehicle windows up and air con on recirculation setting
- Potential for noise and vibration impacts during construction could result in adverse health effects so management and mitigation plan required for health effects
- After construction, some properties will have elevated road noise so mitigation measures are required
- In such a complex project, there are inherent uncertainties in each of the methods used to estimate emissions and concentrations, and there are limits to how accurately any impacts in future years can be predicted

18.3 Summary of key air quality issues accepted by the Health Risk Assessment

- By 2021, without the project, the maximum (residential and commercial) 1-hour concentration of NO2 estimated to be (in micrograms per cubic metre) 375ug/m3 and 360ug/m3 (respectively) – which is well above the guideline (of 246ug/m3); with the project completion, the levels estimated as 307ug/m3 and 286ug/m3 (respectively) – still well above the guideline.
- By 2021, with the project, the cumulative (maximum annual average, rather than acute) NO2 concentrations estimated to be below the guideline of 62ug/m3
- By 2031, with the project, cumulative NO2 concentrations estimated below the guideline of 62 ug/m3
- By 2021, without the project, the maximum (residential and commercial) 24-hr average concentration of PM2.5 estimated to be 29.3 ug/m3 and 30.5ug/m3 (respectively) – which is significantly above the guideline (25ug/m3); with the project completion, the levels estimated as 28.2ug/m3 and 26.6ug/m3 (respectively) – still above the guideline
- By 2031,with the project, PM2.5 levels estimated as above the guideline
- By 2021, without the project, the maximum (residential and commercial) 24-hr average PM10 concentration estimated as 54ug/m3 and 55.4ug/m3 (respectively) – above the current guideline (50ug/m3) and well above the recommended (from the 2014/15 review) of 40-50ug/m3

- By 2021, with the project, the maximum (residential and commercial) 24-hr average PM10 concentration estimated as 52 ug/m3 and 50ug/m3 (respectively) – above both the current guideline and recommended (review) guideline
- By 2031, both without and with the project, PM10 will be above both guidelines
- Community locations most at risk by 2031 of mortality, cardiovascular and respiratory illness from increases in PM2.5 concentrations are: **Homebush Boys High School, Ella Community Child Care Centre.St Joan Of Arc Catholic School, Dobroyd Point Public School, Woodfield Aged Care Centre**

18.4 Methodology of the Health Risk Assessment

The Risk Assessment relies on key aspects of the Air Quality Impact Assessment including:

- The tunnel design claim that there will be negligible impact at sites of portals and ventilation stacks
- The findings of the air quality report within this EIS, which relies heavily on the air quality data from the 3 OEH monitoring stations at Rozelle, Chullora and Earlwood, one of which, Rozelle, does not monitor PM2.5
- Traffic estimates within this EIS (which in turn rely on the population estimates).

For the health indicators, it relies on:

- data that is five (5) years old for the key health indicators
- hospitalisation data only for respiratory indicators,and *has not included any GP data relating to consultations*.

It does not include the demolition of buildings (houses and commercial) in the risks associated with the project, even though a high proportion of pre-1980's buildings could have some asbestos on the sites.

18.5 Flaws in the Health Risk Assessment Methodology

- It accepts the claim that the tunnel design is "state of the art", and doesn't canvass options to filter using actual "state of the art" like the Hong Kong Wanchai By-Pass tunnel and Madrid (Spain) M30 Ring-Road.
- Residents at the Kingsgrove RSL (no) information session were advised by the Tunnel Ventilation representative that the Hong Kong tunnel is filtered due to the proximity of 25

story apartment buildings. This admission by WDA staff proves that Sydney is receiving a cheap 'ventilation' solution despite a similar situation to Hong Kong

  - Arncliffe has existing high rise and more planned
  - McCallums Primary (on a hill) is located very close upwind from the Kingsgrove business park poison stack located in a valley.

- It accepts a tunnel design that infers there will be no pollution at tunnel entry or exit ramps, with the speed into entrance ramps relying on the "piston effect" to pull vehicle emissions into the tunnel and into the ventilation stack. A close questioning of the "experts" (at a number of the WDA consultations) about tunnel exit ramps where they hit Parramatta Rd and West City Link, found they agreed that **there would be pollution in the vicinity of ramps if traffic hits congestion on exiting, and the same would be true for queuing traffic to enter tunnels. Thus their definition of "portals" is strictly that entry/exit area within the tunnel, not leading into or out-of the tunnels.** An independent risk assessment would have noted the possibility of build-up of pollution around these portal sites and the consequent health impacts. Kingsgrove, Bexley North, Arncliffe and St Peters have portals thus adding to the polution issue.
- An AMA submission into air quality states that the current air quality monitoring system in Australia does not adequately capture data relating to the exposure of vulnerable groups; and information on the levels that specific communities are exposed to, and the subsequent risk, is often unknown; the AMA believes the current monitoring system is only capturing data that represents exposure of the broader population, not people at "hot spots" – these "hot spots" would include the large number of residential and commercial properties within 300 metres of major roads (Australian Medical Association (March 2013), Submission to the Senate Standing Committee on Community Affairs, Inquiry into the impacts on health of air quality in Australia, p7). The Human Health Risk Assessment itself indicates there are 10,000 residences and commercial units (which includes multiple apartment blocks) within the affected zone. A conservative estimation of this population would be 40,000 people who may already be living in "hot spots".
- the data collected at the four (4) roadside air quality monitoring stations can be supplemented by similar data from the Lane Cove study (Cowie et al, 2012) collected at Parramatta Road Camperdown in 2006-2008, which indicated highly elevated levels of NO2 and PM2.5. The traffic count (2005) at the Camperdown (control) site in that study was 65,000 vehicles/day, which is a little fewer than the City-West Link count of 69,000 vehicles/day and higher than Parramatta Road (at Dalhousie St Haberfield) of 54,000 vehicles/day (NSW RMS Average

Daily Traffic 2012). All this data shows that levels are already higher than the guidelines, which themselves have been questioned by the AMA and several other groups in their submissions to the Senate Standing Committee On Community Affairs Inquiry Into The impacts On Health Of Air Quality In Australia.

- It should have noted that the new national air quality standards to be endorsed at the end of 2015, well before the project starts, may include higher standards for PM10 than are used in this EIS. The outcome could be many more "hot spots" than acknowledged in the Air Quality Impact Assessment.
- The study should have noted that several international studies have shown the adverse health effects of living less than 500 metres from major roads. In one longitudinal study of 2,300 children in Los Angeles, Guaderman et al found that improvements in the air quality (particularly PM2.5 and NO2) over several years had dramatically improved the lung function of children living less than 500 metres from major roads (Gauderman WJ, Urman R, Avol E, Berhane K, McConnell R, Rappaport E, Chang R, Lurmann F, Gilliland F.2015. Association of improved air quality with lung development in children. N Engl J Med. 372(10):905-913). A paper that calculates the medical costs of air pollution indicates that even the NEPM standards give a false sense of "safe" levels of pollution. This report states that as average levels of air pollution increase so do the average adverse health effects and that in fact there is no safe threshold. The paper claims that proper cost benefit analyses should be undertaken to accurately quantify adverse health effects due to both local and general increases in air pollution (Barnett, A, 2014 "It's safe to say there is no safe level of air pollution" Australian and New Zealand Journal of Public Health 2014 vol. 38 no. 5). The health risk assessment does not acknowledge any critique of what is considered a safe threshold because it completely accepts the assumptions of the Air Quality Impact Assessment. Available evidence doesn't indicate there is an exposure threshold for PM below which health effects do not occur; thus this risk assessment should have erred on the side of caution.
- The study should have noted the large number of people living, working and schooling less than 500 metres from the M5, King Georges Road and Stoney Creek Road are at an already elevated risk of health damage; it also should have noted the increased risk if this corridor does not have the reduced traffic volume estimated by the WRTM, given the additional sources from the tunnel traffic.
- A scenario including all risk factors for 2031 should have been discussed – that of increased traffic on the surface of Parramatta Road the full length of the project. The concept of 'induced traffic demand' is a real one and has not been taken into account by this health risk

assessment. A meta-analysis of induced demand (Cervero, R, 2001, Induced Demand: An Urban and Metropolitan Perspective, Paper prepared for Policy Forum, US Environmental Protection Agency) concluded that, whilst there were a range of elasticities associated with increased demand with new road infrastructure, the phenomenon should not be trivialised

- The study ignores the possible contribution of the project to the estimated health costs of the Sydney region. In 2005 in Sydney motor vehicle pollution alone accounted for $1.5b in health costs (Australian Bureau of Transport and Regional Economics, 2005, cited in Senate Standing Committee On Community Affairs Inquiry Into The impacts On Health Of Air Quality In Australia, NSW Environment Protection Authority Submission, September 2013, p15). As this report states … "particle pollution is the driver for the high public health costs of air pollution" (ibid).
- The mortality data for three key factors (COPD, lung cancer, cardiovascular disease) shows that Sydney Area Health Service has rates higher than the average NSW rate for all three indicators, yet this risk assessment does not question whether exposure to already elevated levels of NO2 and PM2.5 may be a cause of these elevated rates.
- The reliance on five years old data for the key health indicators is problematic, given background sources of key pollutants (NO2 and PM2.5 and PM10) have increased in that five year period, as evidenced by vehicle fleet data. According to the Sydney Morning Herald (March 15-16 2014) the number of diesel vehicles on the road in Australia has more than doubled since 2005. ABS data shows that in 2015 there are 3.6 million diesel powered vehicles, accounting for 19.7% of the fleet; and over the five year period from 2010, the number of Passenger vehicles and Light Commercial vehicles registered with diesel fuel increased by 96.4% and 62.9% respectively (ABS, Motor Vehicle Census, Australia, cat no 9309.0). This increase in diesel fuel use would have had both short term and longer term impacts on health in the period since this health data was published and has not been captured by it, nor has this health risk assessment mentioned increased risks from the growing diesel fleet. The other concern with growth of the diesel fleet relates to car manufacturers using software called "defeat devices" that allows the masking of exhaust emissions in pollution control tests. Recent revelations (eg SMH, Sep 23 2015) of such corruption by what was thought of as a "good corporate citizen" – the Volkswagen company – indicates the distinct possibility that other manufacturers may be doing the same. If the environmental protection laws are being flouted by many diesel fuel vehicle makers, then the claim by this EIS that tougher laws are making the Australian vehicle fleet (and therefore the air) cleaner is

questionable. The best option for any government keen to improve air quality in polluted parts of Sydney would be to quickly phase out diesel vehicles.

- Hospitalisation data for respiratory indicators should have been supplemented by GP survey data (given Medicare does not collect this level of data), collected by the relevant Local Health Districts.
- Sydney Area Health Service collects data on health risk factors, published for each Local Health District. The risk factor model is one that can be called a "personal behaviour" model. It includes risky alcohol drinking, smoking, consumption of fruit & vegetables, being overweight or obese, and adequate physical activity). It does not include external risk factors, like living within a few hundred metres of a busy road. The fact that the Area Health Services in NSW do not collect data for external risk factors, although they are known (e.g. exposure to coal dust (mainly PM10) and road pollution (notably NO2 and PM2.5) means that more meaningful data is not available to these types of Human Health Risk Assessments.
- The health impacts from noise and vibration seem to be underestimated by this health risk assessment. The writer should have conducted an independent analysis of that assessment, rather than relying on its findings. A independent review of the noise and vibration section of the EIS (which will be published by the People's EIS soon) raises uncertainty in a range of areas of the noise and vibration assessment. It states that, given the number of potentially impacted properties and people within the project area, further work needs to be done to ensure the local community and other affected stakeholders are provided with a fully informed assessment. This needs to 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 which does provide for any further input from the community.
- The health risk assessment should have included a risk assessment for asbestos and a management plan for mitigating risks, given serious community concern has been expressed over issues with asbestos removal and treatment at Granville (M4 widening stage) and at Alexandria (M5E stage).
- It is common practice in health research (including health risk assessments) to identify and analyse any related health studies to understand their the implications for the project being assessed-in this case the WestConnex project.Two such studies have been conducted on the Lane Cove Tunnel and on the M5East tunnel. The risk assessment ignored the 'fine print' findings of both of these studies. The Lane Cove study was of the short-term respiratory (asthma-like symptoms) health effects of exposure to emissions from the tunnel stack. The study was conducted 2006-2008, with thirty six (36) participants originally, falling to twenty

(20) by 2008. This is a very small cohort from which to draw any strong conclusions. The "control site" was Parramatta Road, Camperdown. The main conclusion was that residents near the eastern tunnel stack reported increased symptoms (even though there were no increases in pollutants) and this could be accounted for by other sources of pollution not measured in the study (e.g. particles smaller than PM2.5 and/or volatile compounds) or other unknown sources. The study also found significant adverse effects of increased airway inflammation, and chest and eye symptoms associated with exposure along Parramatta Road Camperdown after only 2-hour exposure periods. The authors recommended a follow-up study to better understand the effects of the ventilation stack. (Christine T Cowie et al, 2012, 'A randomised cross-over cohort study of exposure to emissions from a road tunnel ventilation stack', BMJ Open 2012;2). No further studies have been conducted.

- In the study of the pollution effects of the M5 East tunnel (NSW Health, 2012), it was stated that the ventilation stack was an important source of air pollution in the area within a 2 km radius, contributing 23% of NOx and 17% of PM10. The study's aim was to consider cancer incidence in the vicinity of the tunnel stack. Whilst it found there was a significantly higher incidence of lung cancer in postcodes immediately around the stack, the study concluded that it was unlikely there was a causal link. However, the study did qualify its overall conclusions with the comment that the descriptive epidemiological method used in the study was a relatively weak tool to resolve the type of issues under investigation. The study methodology was unable to discern the types of lung cancers screened in the area (smokers vs non-smokers). The study's argument was that, given lung cancers can take a number of years to become apparent, the higher incidence recorded after the opening of the tunnel may not have been connected to the stack emissions. The study concluded that the higher incidence of lung cancer probably pre-dated the locating of the stack in that area. This is an alarming finding, given that the cancer registry data would have been available to NSW Health, Department of Main Roads and the other bodies responsible for the EIS prior to the building of the M5East. So it would appear that an area of Sydney which already had an elevated incidence of lung cancer was chosen as the site of the M5East ventilation stack, when health research was already indicating the causal link between particulate matter and lung cancer. Given that mortality data for three key factors (COPD, lung cancer, cardiovascular disease) indicates that Sydney Area Health Service has rates higher than the average NSW rate for all three, is it possible that this project is again ignoring the potential health impacts of a project that independent experts predict will increase total traffic pollution over time.

18.6 Flaws in the assumptions on which EIS health findings are based

- The health risk assessment does not take into account the possibility of total higher traffic along our local roads . An Australian Government Department of Infrastructure and Transport Research (2012) report into traffic growth in Australia shows that traffic per person in Australia has grown steadily between 1965 and 2011. The measure of traffic volume (number of vehicles x distance travelled = vkt) in all states and major cities for this period indicates that the pattern of increases has been consistent, with only minor changes in response to petrol price rises, unemployment and the global financial crisis. Forecasts of future growth in traffic volumes indicate that traffic in Australia will rise from 55 billion vkt per quarter in 2011 to more than 65 billion vkt per quarter in 2020.

19 The project fails in applying an appropriate solution to a 21st century problem of congestion

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.

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:

(a) 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 (1)

(b) Serious human health impacts due to petrochemical vehicle emissions/smog, including:

i) Lung cancer,

ii) Asthma,

iii) Heart disease,

iv) Impaired lung development in children living near motorways/exhaust stacks.

(c) Waterways contaminated with road runoff (heavy metals and carcinogens in brake and clutch dust, exhaust particulates etc.).

(d) High traffic crash costs (of deaths/traumatic injuries and material damage).

(e) Urban sprawl and increasing commuting distances.

(f) Social isolation for non-drivers living in car-dependent suburbs.

(g) Noise pollution from traffic and its impacts on sleep.

(h) Impacts on visual amenity (pollution stacks, concrete interchanges, concrete flyovers).

(i) Extreme summer temperatures (urban heat island effect).

(j) Community destruction and severance.

(k) Destruction of heritage.

(l) Less incidental physical activity from walking and cycling (including to/from public transport), resulting in higher rates of obesity, diabetes, cancer and heart disease.

(m) Increased chauffeuring burdens for parents and carers.)

(n) Less independence for children.

(o) High per-capita greenhouse gas emissions.

20 The project contributes to carbon emissions

A shift from car-centric transport to one based on public transport, walking and cycling can reduce carbon dioxide emissions by 40%, according to a report by the Institute for Transportation and Development Policy and University of California.

"Transportation, driven by rapid growth in car use, has been the fastest growing source of CO2 in the world, said Michael Replogle, ITDP's managing director for policy and co-author of the report. "An affordable but largely overlooked way to cut that pollution is to give people clean options to use

public transportation, walking and cycling, expanding mobility options especially for the poor and curbing air pollution from traffic."

"The analysis shows that getting away from car-centric development will cut urban CO2 dramatically and also reduce costs, especially in rapidly expanding economies," said report co-author Lew Fulton, co-director of NextSTEPS Program at the Institute of Transportation Studies at UC Davis. "It is also critical to reduce the energy use and carbon emissions of all vehicles."

Given that climate change is real, and every county must endeavour to reduce emissions significantly, the WestConnex project is not best practice. I therefore reject this project in its entirety.

This 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 on Parramatta Road than predicted) of increasing these levels across the Corridor. Accordingly, I strongly object to the entire WestConnex project.

20.1 Strategies to manage climate change risks put off to "detailed planning" stage

The Climate Change Risk Assessment portion of the M5 EIS conjures an image of a durable roadway system withstanding the tests of a changing climate. While the document incorporates climate change into the risk profile of the project, it ultimately recommends very

little in the way of direct risk management strategies other than the "consideration" of various potential risks in the next phase of the design process and a few non-binding suggestions as to what these design adaptations might look like (see pages Chapter 25-9 & 25-10).

The calculation of a Greenhouse Gas saving is based on three basic deceits: 1) it conceals the predicted actual change in GHG emission (27% increase over 10 years); 2) there is a huge underestimation of the induced travel effect); and 3) the comparison with a do-minimum scenario is a false comparison.

1. **Actual 27% increase in emissions.** The modelling predicts an actual 27% increase in GHG emissions between 2021 and 2031 with the project (though there are no statistics to compare with current emissions). This is completely incompatible with Australia's commitment to reduce GHG emissions by 28% by 2030 or with the agreements reached at the Paris Conference to be carbon neutral by 2050. We need to be moving rapidly to reduce road travel which is inefficient. For example, road haulage emits three times more GHG than rail for the same tonnage. The presentation of the EIS, focussing on the purported saving compared to a do-minimum scenario is deeply dishonest in that it conceals the dramatic increase in emissions that will occur under this project, as well as under the do-minimum scenario.
2. **False comparison.** The EIS compares GhG emissions from traffic to a scenario without major road works. Considering that billions of dollars of public money is being spent on the project, the proper comparison should be with one where that money is invested in an alternative project that delivers a reduction in road use (and hence emissions). The predictions assume that road traffic will be about 107,000 journeys per day in each direction in 2021 and 130,000 by 2031. As an alternative, a bi-directional light or heavy rail line could reduce this by as much as 40%, providing a much larger reduction in GhG emissions.
3. **Induced travel.** There is a basic understanding in transport economics that if you add capacity on a congested road network, the number of vehicles using the network will increase until the congestion returns. While the EIS acknowledges such an "induced travel" effect, there is no explanation in the 258 page transport report about what assumptions were used. The report seems to have hugely underestimated the effect, as can be seen in some of the predicted traffic volumes. For example, it predicts if that all of Westconnex is built, traffic flows in the project area will be reduced by 10% and

on the Pacific Highway around the Cook River by 70% compared to the do-nothing scenario. This conclusion must be based on some childishly naive assumptions. In reality, users of these roads will adjust to any new ease of movement by increasing journeys. The main reason that the EIS predicts a reduction in GHG emissions is that there will be less congestion, based on these predictions of relatively low-flow. But, if the full effect of induced travel is taken into account, the level of congestion will be the same in 2031 as it is now, and there will be more vehicles affected. Thus, instead of a decrease of 2.9% compared to the do-nothing scenario, a 20-30% increase is more likely.

21 . National Trust Conclusions

The National Trust noted in their M4 East submission that this M4 East is only one section of the WestConnex Motorway and that **there will be additional heritage impacts relating to the St Peters Interchange and the future link between Haberfield and St Peters.**

The heritage impacts of the WestConnex Motorway are severe. The public must question whether the financial commitment for the total project in today's dollars of $16.8 billion (inevitably set to rise) would be much better allocated to public transport.

Back in the 1970's – workers refused to demolish 'those old buildings at the Rocks'. These historic buildings are an icon and asset to our Sydney. It is the same with the inner suburbs across the 33km. this is our history. It is gobsmacking that WestConnex project has been proposed with such a significant loss as a result.

I agree with The National Trust in their objection to the WestConnex M4 East proposal because of its severe impact on Listed Heritage Items and Heritage Conservation Areas and because it diverts 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.

21.1 Alexandra Canal – heritage importance

The Alexandra Canal is also at risk by the WestConnex project – yet another piece of our history likely to be destroyed.

Alexandra Canal is of high historic, aesthetic and technical/research significance. Historically, it is a rare example of 19th century navigational canal construction in Australia, being one of only two purpose built canals in the State, with one other known example in Victoria. It has the ability to demonstrate the NSW Governments initiative to create water transport as a means of developing an industrial complex in the Alexandria and Botany areas and exploiting the use of unemployed labour to achieve its scheme.

It played a seminal role in the changing pattern and evolution of the occupation and industrial uses of the local area and nearby suburbs, which included filling large areas of low lying land for development.

Aesthetically, intact original sections of the canal, comprising pitched dry packed ashlar sandstone, provides a textured and coloured finish which is aesthetically valuable in the cultural landscape. It is a major landmark and dramatic component of the industrial landscape of the area, particularly as viewed from the Ricketty Street Bridge and along Airport Drive.

Scientifically, the excavation of the canal provided a valuable contribution to the understanding of the changing sea-levels along the eastern seaboard and the antiquity of the aboriginal presence in the area. Intact original sections of the fascine dyke sandstone construction are rare examples of late 19th century coastal engineering works.

I object to the WestConnex project in its entirety, due to the destruction of our heritage for what is a wasteful project that fails to achieve any of its stated objectives.

22 People's stories

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.

22.1 Willows Nursing Home

According to the GHD EIS Social Impact report, at least five aged care facilities including hundreds of beds lie near the path of the M5 East.

Residents of aged care facilities or their families try to choose the best environment for their final home. High on their list of physical priorities are peace and quiet, a bright outlook and easy access for visitors.

Aged care facilities are both a home for residents and a business. While the EIS economic impact statement did not conduct any consultations with other businesses, 'social infrastructure' organisations such as churches, schools and health care facilities were asked for feedback and nearly all told Westconnex of their concerns.

The Willows Nursing Home was no exception. The GHD report records its many objections including noise, pollution and dust and anxiety about how visitors and staff would access the home both during construction and afterwards.

This is because if the M5 East was to proceed along the planned route, Willows Nursing Home would literally be in the middle of a construction zone and later next to the tunnel exit and unfiltered ventilation stack.

I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.

22.2 People's EIS interview with Sass Inbari.

Sass Inbari has owned Willows Private Nursing Home on Orpington Road, in Ashfield, since 1977. It was his father's before that and Sass built it up from 27 beds to 40. The home provides high care support to its elderly residents, and welcomes visitors from 8.00 am to 8.00 pm daily.

The Westconnex GHD social impact study notes that as a high care residential facility "the impacts of vibration and noise could be detrimental to health and wellbeing of residents."

Sass is concerned about the noise and dust occasioned by the demolition of the buildings immediately behind and next to the nursing home. Later there would be more disruption when this emptied space would be occupied as a construction site for the motorway and a parking lot for hundreds of large diesel trucks that will move in and out of the site each day.

The residents at the Nursing Home are frail and vulnerable. Staff are also upset and it will be a major inconvenience with road closures and works for relatives coming to visit, ambulances, delivery etc.

Bus stops on Parramatta Road are going to be moved, which means it will be harder for relatives to visit the residents.

Sass first heard about the Westconnex motorway on the news like everyone else, then about 3 or 4 months ago he got a visit from Westconnex representatives to discuss his concerns. "They took it all on board but I have not heard from them since," says Sass.

He wants compensation because of the impacts of the construction and of the operation of the motorway, and he is worried he is going to loose business.

He is angry too as he says he doesn't "know what good the Westconnex is going to do. All it will do is just shift the bottle neck towards the city."

He doesn't think people realise what impact the motorway will have.

All the other businesses around him, on Paramatta Road, have been purchased. Sass doesn't wish to be purchased, only compensated. He is stressed and frustrated as he feels there is nothing he can do to change the situation

I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.

22.3 This is the story of Kevin

22.4 Impact on Residents by Westconnex

WestConnex was required to include a social impact study in the EIS. This is Appendix M. The NSW Planning Department required that this section of the EIS should report on the impact of the M5 East on communities from planning through to operation of the WestConnex. GHD was hired to work alongside AECOM to produce the social impact study. According to its website, GHD is a global services company that operates in the "markets of water, energy and resources, environment, property and buildings, and transportation." It provides, "engineering, architecture, environmental and construction services to private and public sector clients." It is not a specialist in social impact studies.

People's EIS caught up with GHD consultant Anne Mithieux at a Strathfield EIS exhibition session in September. She explained to us that GHD did not interview any people whose houses were being acquired directly which probably explains why her impact study contained very little detail and described the stress and disruption that is already occurring along the M5 route as if it was a future event. She saw her task as recommending mitigation for the impacts of a project that was going to happen. (This is the sort of attitude that is fueling critics' apprehension that the Planning process is a set up.) She was not uncaring but is not very familiar with the area she was studying. She seemed a little surprised about the intensity of the impacts that were already happening.

Two weeks ago, the ABC interviewed Arthur Alibrandi who told the ABC News that his 82-year-old father, Joe who has lived in his unit for nearly 50 years, had been offered an amount by WestConnex that would make it "physically impossible" for his elderly father to stay in the area.

In response, Premier Baird told the ABC, "At times, there has to be a provision for the majority, there are difficulties for some people as part of that… We're doing everything we can in terms of compensation, looking after them, provide provision for a new home."

This statement reveals a similar detachment and apparent lack of knowledge on the part of the Premier. According to the SMH, Slater and Gordon Lawyers, who are representing about 70 property owners affected by WestConnex compulsory acquisitions have found that offers are 20-50 per cent below what clients' properties are worth. This means that residents quite unexpectedly are not only losing their homes but feel they have lost control over where they can live altogether.

I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.

22.5 Kevin : another story from Underwood Road

Kevin and Ann (not their real names) are both in their eighties. Five years ago, they moved to Homebush, a community along the M5 route that will be hit hard by the WestConnex.

Initially, Kevin wasn't bothered by the WestConnex because according to earlier plans, it would have bypassed his home. But in June this year, he was told WestConnex would compulsorily acquire his home and he and Ann must move out by April. As anyone who lives in Sydney would know, nine months is not nearly enough time to unexpectedly sell and find another home.

When Kevin and Ann moved into their home five years ago, they expected to stay there for the rest of their lives. They had specifically chosen the house because it had no stairs, was walking distance to the train station and shops, and in a quiet street.
When interviewed for the People's EIS this week, Kevin said,

"I am very unhappy about the WestConnex. I can't find anywhere to replace my house. I am very old, in my 80s, so I thought the place where we are living at the moment, is our home. But I can't find anything to replace the house that is near the station and the grocery shops. There were a few houses on the market, but they are too expensive. There is no way to get one of those houses, with the money I get from our house."

"They're going to acquisition it, they're going to buy it by force."

The situation is "very stressful. Particularly for aged people like me." He describes the search for a replacement as a "nightmare" that may have "shortened my life expectancy".

He laughed when asked if WestConnex had been helpful. "No. Just one way instructions."

"WestConnex is not helping to find a new house. It did a valuation and that's it. The amount from WestConnex may be fair, but I can't find anything to replace the house with the money from WestConnex."

I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.

96 year old resident Ray Harrison lives close to what could become a massive construction site for the tunnel exit and ventilation stack. He has been regularly protesting on the streets of Haberfield

22.6 WestConnex GHD report warns of serious risks to residents, especially vulnerable ones

The GHD report did find that the acquisition process could carry ‘significant social risks’ (Appendix M, p. 96)… including ‘inaccessibility of equivalent housing at a comparable

cost…relocation health risks…[and] altered access to social infrastructure' as well as potential housing stress due to higher rent or house costs. It is 'expected that the majority of owner-occupiers would aim to relocate within the local area', and effects may be compounded by the timeframe of just 9 months for some households to be relocated, market volatility and reduced housing stock available to relocate into (Appendix M, p. 68).

It also noted that the "stress and anxiety" could lead to "impacts on health, well-being and quality of life, which have been worsened by the uncertainty and the changing footprint of the project with some dwellings originally to be acquired now not, and some originally not impacted now required for the project (Appendix M, p. 68)."

It found that the impacts would likely impact vulnerable households but that even less vulnerable households would be affected as "land acquisition would increase property demand in the local area with some households with only nine months to identify alternate properties". (Actually it is less than nine months for Kevin as some property owners have been told they must be out of their houses by April next year.)

"Overall it is anticipated that the social impacts of relocating for many of the directly affected households would be **major short-term impacts**. In some cases, where households are unable to relocate locally, the social impact may involve an extended recovery time to re-establish social networks and daily routines for work, study and recreation. Alternatively, where households need to incur higher levels of debt in order to remain in the local area, increased mortgage or rental stress may result in greater and longer term social impacts."

Short term impacts are defined as between 1 and 3 years. (Appendix M p. 23). Major impacts are substantial ones that the report states could be mitigated, although it does not explain how this might happen after residents are forced out, which is in the process of happening at the moment. So for older people this could be very serious. The stress and forced relocation could shorten their lives, particularly for those who do not have strong family support networks.

Given the lack of any in depth or direct investigation by GHD, it is disturbing that the consultant repeats and appears to accept the word of WestConnex at face value. On page 87, GDA reports:

WDA is also providing an independent service to vulnerable households (e.g. elderly, those suffering an illness) to help assist with their relocation. This service aims to provide assistance with tasks such as finding a new property (either to rent or purchase), arranging removalists, disconnection of services (electricity, gas etc.), attending appointments with solicitors and other tasks associated with relocating. With nine per cent of people in the region over the age of 70 years and 4.6 per cent
needing assistance for their daily needs, this support will be imperative to mitigating relocation disruption.

On the basis of this statement, the report concludes that "minimising dislocation of affected households from their existing socio-economic networks is a key consideration in avoiding social risks to those affected by property acquisition."

22.7 GHD report out of touch with residents' experiences

While the WDA statement quoted in the GHD report does represent the official version of what is happening, it doesn't represent what residents would have told the consultant had they been asked. The problem is that with five months to go until they empty their homes and move to new houses, residents such as Kevin claim that support is simply not there.

WestConnex Action Group Haberfield spokesperson Sharon Laura told the People's EIS, "I hope those who are currently in the process of trying to negotiate just terms for the loss of their homes are not panicked into accepting what is first on offer by WestConnex/RMS." She recommended that residents negotiate hard like Aurelia to get the best deal – and not leave their current home until they have found a suitable replacement for the home and community they are losing.

"In Haberfield and Ashfield, there are owners and tenants, who have received their PANs (notice to settle on agreed price, either as an owner or tenant), and who are being hassled to leave their homes before Christmas. Many have no idea of where they will re-locate. Some, who may have been offered a 'good price', say that even with this, they cannot afford to purchase or rent back in Haberfield or Ashfield. So much for 'just compensation' and a just process of acquisition. Money provides no 'just compensation', when a person or family is forced out of their community against their will, and in an such and untimely manner. Why should anyone leave until they are ready and have got something decent to move into?"

The WestConnex Action Group rejected Baird's assurances that the government is doing all it can to support people and called for a halt to forced acquisitions.

Aurelia's 96 year old neighbour Richard reading EcoTransit Sydney newspaper

There are also serious impacts for residents living in aged care facilities and for tenants who may find it impossible to find or afford comparable accommodation in their home suburb

I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.

For many, working to own your own home is an important part of life in Sydney, although it is increasingly unlikely for younger residents due to rising house prices. People work hard to meet

expectations. The least they expect is that when it comes to the ownership of their home, they will be treated fairly.

The picture emerging if far from what Premier Mike Baird called "doing everything we can in terms of compensation, looking after them, provide provision for a new home" or the low key distanced tone of the Westconnex GHD Social Impact study

But you don't have to be old to be severely affected by the threat of losing your home for less than its value, especially when you call Westconnex's so called free counselling service and they don't ring back.

22.8 The is the story of Kim Sun who home at 21 Young Street will be smashed for Westconnex:

For the past few months, Kim Sun has spent almost every weekend attending auctions and open home inspections in and around North Strathfield. He is desperate and stressed as house prices are way above what he can afford.

The thing is, Kim and his wife already own a lovely home debt free in North Strathfield, which they have renovated bit by bit since buying it in 2006. They've added insulation, solar power and a water tank as they expected to stay in it a lot longer. Their six year old son rides his scooter with his dad to the local school and his grandmother lives a 5 minutes drive away in same suburb.

But in November 2013, Kim received a letter from the WestConnex Delivery Authority (WDA), informing him his house was to be acquired to make way for the motorway. It was the first he'd ever heard of the WestConnex. The family must now vacate by March next year, but Kim says WestConnex will only buy their house at nearly $200,000 less than market value.

"The price Roads and Maritime Services offer means we can only buy a home very substandard to the one we are living in. And time is running out. " says Kim.

"It's not right. It should be market value. That's what they say they are offering, and it's not. They are not doing the right thing by people. Considering the project is going to cost $15.4 billion, and they need our place, and they are stressing us out, why put on that extra pressure of offering below market value."

Kim Sun's has been forced to sell his house to RMS at below market value

“It’s a difficult situation too for me because my wife doesn’t work, she looks after my son and the house. I am the only one working, so it makes it a bit difficult having to borrow extra money to find a place, so we can stay within the area, with what they are offering.”

Kim says it’s the same for everybody on their street: “We all seem to have a problem with getting the market value.”

He knows others who have had to move to the Central Coast after their house was acquired, but that’s not an option of the Sun family. “I don’t want to change schools for my son, he likes it there, and mum is close by. I don’t want to go somewhere else,” says Kim, who catches a train from North Strathfield station or Strathfield station into work at Town Hall. “We were hoping to stay here a long time, which is why we set the house up comfortably.”

The past two years of negotiations and uncertainty have taken their toll. Kim is struggling with stress and is on antidepressants. It’s a situation made worse by a lack of communication from the WDA. “I’ve tried to call WestConnex myself, but they don’t return calls,” says Kim, who has kept a log of these calls, having been assigned a ‘job number’ for each. He feels “extremely disapointed and stressed” with the way WDA has treated his family.

In July this year Kim called WestConnex wanting to know by when exactly the house had to be emptied, and also asked about accessing the free councelling service on offer. His call was never returned.

A young family, work and an ailing mother already make for a busy life, and Kim says the last thing he needed on top of it all is to be "kicked out of my home in such a short space of time now".

Asked by the People's M4EIS what he thought of Premier Baird's comment about needing to make provision for the majority, Kim says: " If I was losing my house to public transport I'd probably feel less hurt by it. I don't think the WestConnex is going to solve our problems. For me public transport would be the way to go first. And I thought 'market value' was market value. I don't see why we have to negotiate so hard with them."

I object to the WestConnex Project in its entirety, as the treatment of residents is an unacceptable. It is un-Australian.

22.9 Snippets from 'American Way' interview with Jessie J (*The Voice*) about Sydney

Speaking of adventure, Jessie says her newest discovery is an area called Newtown — best described as being the Sydney version of what Brooklyn is to Manhattan. Located two train stops from the city and bordered by the sprawling campus of The University of Sydney, the neighborhood is a little alternative with a touch of hipster chic and vintage cool thrown in for good measure.

One of her recommendations is in the historic Rocks area abutting the harbor at the northern end of the Central Business District. "The fact that you've got the Sydney Harbour Bridge, the Opera House and some great bars and restaurants all in the same area makes it very unique. There's nowhere else in the world you could be in that moment."

If she had to name one place in the city that is a nonnegotiable, it lies just across the harbor under the northern pylon of the Bridge.

"Luna Park is an old-fashioned amusement fair that's lit up beautifully at night," she says. "I feel a bit bad talking about it because it's a place the locals adore and it's got beautiful heritage architecture with a view across the water that is just beautiful. There is also a great live-music venue there, which I've actually played, so do a bit of research beforehand and you can actually catch a gig while you're there."

Ask any Sydneysider how they feel about this icon, and they'll usually tell you it shines all the brighter the longer you look at it. Much like Jessie J herself

I object to WestConnex in its entirety, as it will destroy heritage areas that are of interest to tourists, not to mention, of national interest. You can't just destroy what is the essence of Sydney.

23 Where does democracy fit in?

Prime Minister Malcolm Turnbull has created a new ministry for cities and the built environment. Announcing his decision last month, he said:

"Liveable, vibrant cities are absolutely critical to our prosperity. (They are) where the bulk of our economic growth can be found … (and they are) economic assets. (M)aking sure that Australia is a wonderful place to live in, that our cities and indeed our regional centres are wonderful places to live, is an absolutely key priority of every level of government. Because the most valuable capital in the world today is not financial capital … (it's) human capital"

The inner west and inner south is a wonderful center which is mostly people for walking – nearly 90% of people are walking at any one time, 80% of people get there by public transport. A metropolitan strategy based on walkability and public transport is exciting.

WestConnex is out of kilter. It is hard to believe that the NSW Government would have really wanted this in their array of strategic plans (it certainly was not part of the NSW Transport Master Plan 2012). Obviously – it was dropped from above aka (worst ever) PM Tony Abbott.

We need to rethink how to plan to tackle Sydney's congestion issues. Fifteen billion dollars (plus) is a very sizeable amount of money – let's put it into that altenative future, because that's where the competitive future is for Sydney, and it will give us a much more liveable city.

Let's get serious about providing a better future for Sydney and throw wasteCONnex out.

I reject WestConnex in entirety, as it has not been through the proper planning strategy. If proper protocols had been followed, such a pathetic project would not have seen the light of day.

The People of NSW have been deceived and mislead by the proponents of the WestConnex motorway.

24 Conclusion

I consider it extraordinary that the WestConnex project has progressed to the point of issuing contracts and PAN notices to residents – without following the required dNSW and Federal public money u Sw Connex project has progressed this far. A project that has not followed due project procedures. A project that has been shrouded in secrecy and unable to provide evidence that it is the right project for Sydney.

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.

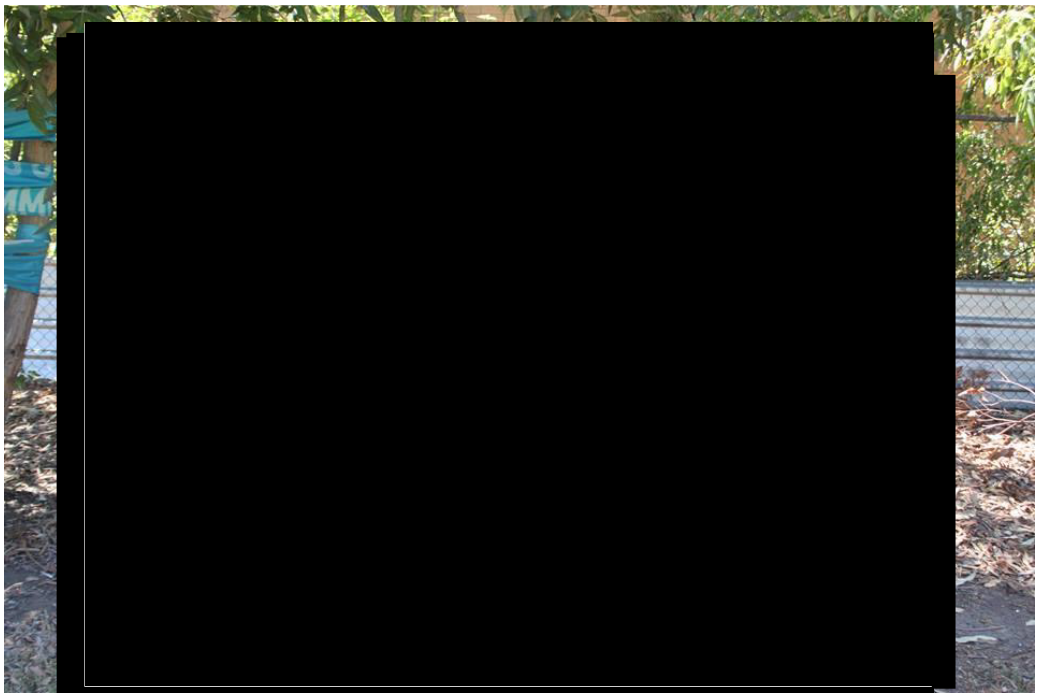
I further object to WestConnex community liaison staff **concealing information from residents.** The KGR M5 Interchange EIS stated that noise walls will be reinstated in their current form.

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.**

I understand that the Dept of Planning is under enormous pressure to approve the WestConnex project. Given the enormous community backlash and negative press to this motor-way. Given that WestConnex are really struggling with this project. The most sensible thing to do is to reject the WestConnex in its entirety and put the sad dog down.

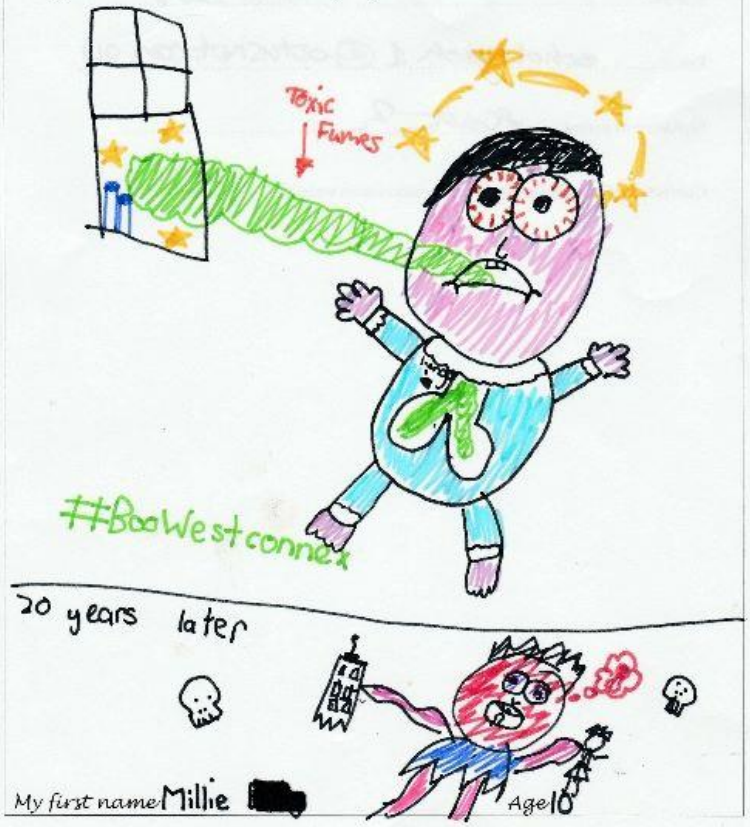
Then lets set about properly engaging the people, and getting Sydney moving with great public transport.

25 Children's voices from Kingsgrove.



Secretary
NSW Department of Planning and Environment
GPO Box 39, Sydney NSW 2001
Submission to DP & E Project Number: SSI-id_6788 WestConnex New M5

I object to the westconnex project because



20 years later

My first name Millie [redacted] Age 10

Mum or Dad to sign the back of this letter

Secretary
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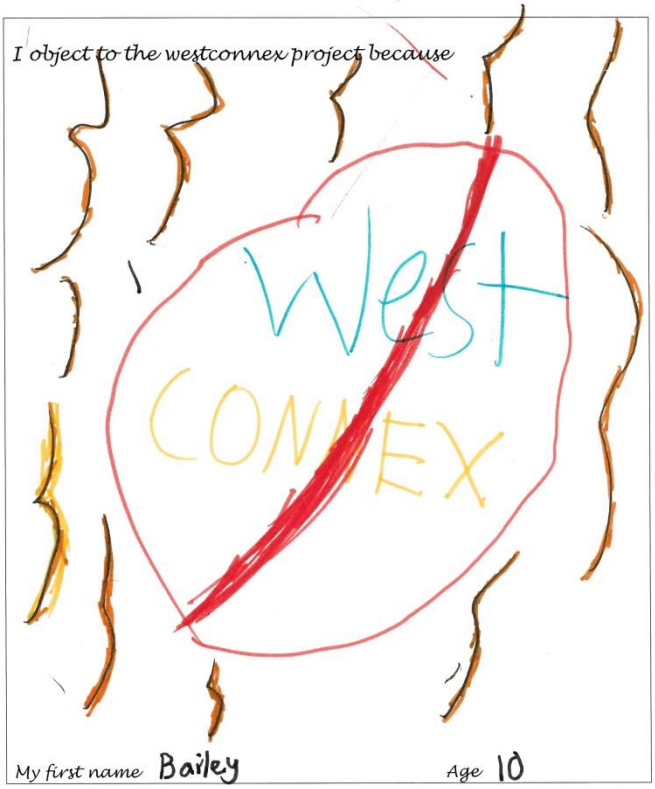

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Submission to DP & E Project Number: SSI 14_6788 WestConnex New M5

Mum or Dad to sign the back of this letter

26 References

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[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Name: Sean English
[redacted]

Address:
[redacted]

Beverly Hills, NSW
2209

Content:
I strongly object to WestConnex. It is not in the best interest for Sydney

[redacted]

[redacted]

[redacted]

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[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.

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.

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 write to express my strong objection to the WestConnex New M5 East motorway proposal as well as the entire WestConnex project in entirety.

The strategic justification for the New M5 is weak and inconsistent with the NSW Governments strategic planning and policy framework.

The 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 blown out to $16.8 Billion (and expected to increase significantly) which is not fully funded. WestConnex represents a significant opportunity cost. This level of investment could deliver other projects of significant economic and social value to the state which could benefit a greater number of people and businesses.

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 Sydney into a road project with inadequate assessment, and then for the proponent to find that it is a myriad of more and more expensive toll roads, and more and more road widening in a desperate effort to try and make it work. This is not how infrastructure planning should be conducted, and thus reasonable for the community to consider that this is road planning on the run.

The weaknesses of the proposal have been amplified through poor project governance.

I strongly urge the Department of Planning & Environment to not approve the New M5 East and the WestConnex project in its entirety as it is not in the best interests for Sydney.

It is concerning that over one million people will be directly impacted by the WestConnex project and the myriad of 'complementary' works.

It is concerning that the project is being released in sections, in an effort to avoid the scrutiny of the huge social , environment and financial risks that NSW is exposed.

I consider the inadequacy of the New M5 EIS is so profound that I do not consider that it can be used as the basis for a Ministerial determination to approve the project.

In short, I reject motorway investment of this scale, in this century, stating only rail infrastructure (light, heavy, freight) can keep this city liveable and functional if we wish to maintain a 'global' economic status based on population and investment growth.

The WestConnex project does not fit within the rationale of the NSW Master Transport Plan – for which it claims it is front and center despite retrofitted after the initial Plan release:

"Regular physical activity is important to our health and wellbeing. Recent research shows that many people get an additional eight to 10 minutes of exercise each day when they use public transport. Importantly, being active for part of our journey to work or school incorporates exercise into our daily routines. The NSW Centre for Population Health has observed that public transport use, walking and cycling are associated with a number of health benefits, including a reduced incidence of obesity, higher levels of exercise and improved mental health.

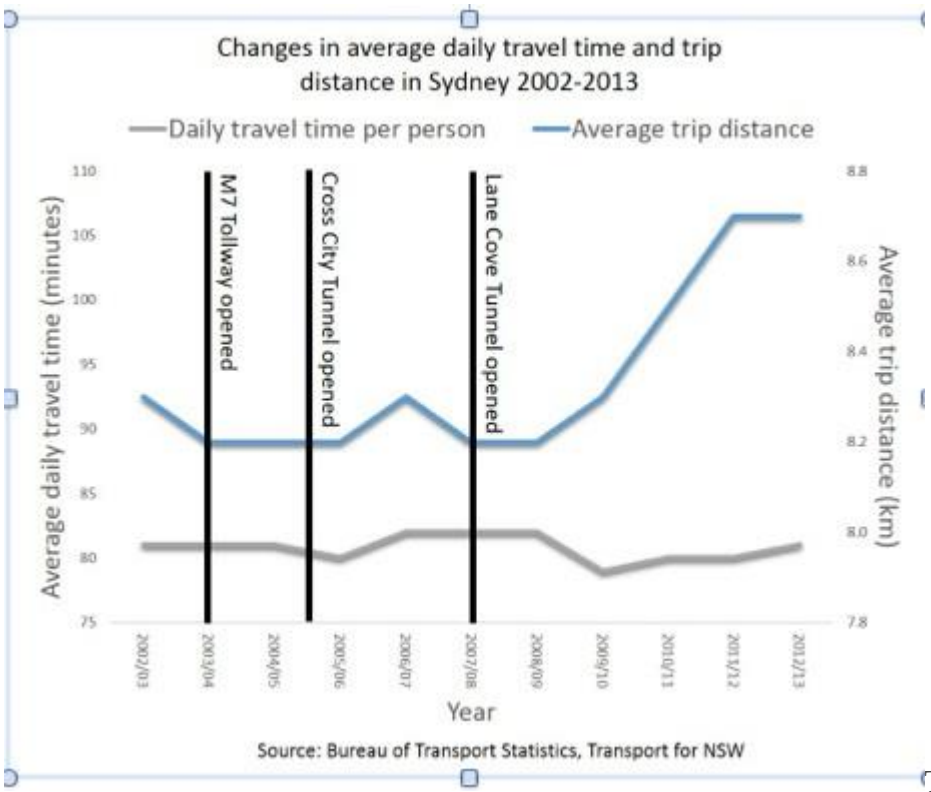
Building social and community goals into our transport planning will strengthen communities, reduce disadvantage and open up opportunities. To meet our objective of reducing social disadvantage, we will require new ways of thinking about how to distribute transport services more evenly across the State. We will need to give people healthier travel options, such as making it easier and safer to cycle to work or walk to the nearest train station. We will also need to integrate our transport system more closely with land use planning, creating well-designed cities and suburban centres that ***reduce our reliance on cars****, encourage us to be more active and produce safe, attractive and well-used urban spaces".*

1 Summary of objections based on subject area:

The very short time period has not been sufficient to address technical issues in this EIS. This is in itself a **corruption of the democratic process** to deny the public the opportunity to assess nearly 8000 page EIS during the Christmas holidays when school groups have not been granted the opportunity to respond. I request the EIS response time be extended to end March 2016.

1. The EIS does not comply with the Secretary Environmental Assessment Requirements (SEARS).
2. There are major issues with the Traffic and Transport Assessment. There is insufficient information about the modelling inputs, assumptions and methodology for the forecasts to be independently verified. There is no sensitivity analysis of key assumptions.

3. The social and environmental impacts described in the EIS are unacceptable and far outweigh any benefits of the project. **Because of flaws in the modelling, the actual impacts are likely to be even greater than those forecast.**
4. The project does not meet the project objectives.
5. Many of the project objectives, such as congestion relief, could be met through better management of demand on the existing road network, e.g., through reform of road pricing. The corridor already has an extensive and high capacity road network; there is just too much demand at present for it to operate effectively. Adding more capacity will not lessen this demand; it will only serve to increase it.
6. 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 can be effective in meeting the main project objective (reducing congestion), then what is the rationale for adding more capacity
7. The project makes little sense from a transport planning and policy perspective. The role of motorways is to allow traffic to circumvent densely populated areas. For radial transport into and out of urban centres, mass transit is more efficient and economical, and has less impact on the human population.
8. The project is not in the public interest. It will be used by less than 1% of the NSW population each day. The rest of the population will pay dearly in terms of higher traffic impacts, poorer air quality, and state and federal taxes being diverted from public transport and other more worthy causes?
9. 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).
10. 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 (see graph below). 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 higher speed of tollways has simply encouraged people to move further from work, drive more, and make longer trips than before, for example, visiting shopping malls instead of local shops. It has made road more attractive than rail for freight.

11. **This predict and provide approach to transport planning has been a failure, and is being abandoned by advanced nations. In a city of 5 million people, we can never provide enough road capacity to enable everyone to live as far from work as they like, and drive wherever and whenever they like in free flowing traffic.**

2 Failure of Project Governance

I object to the entire WestConnex project as it has failed to follow the correct and disciplined project governance requirements. Please respond to the below

2.1 Lack of Transparency and Proper Process in Project Selection

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' bypassing important evaluation steps aimed at providing assurance to government and the taxpayers that the project is the best solution.

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)

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)

"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)

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

Unfortunately, the WestConnex project **does not appear to be an example of industry best practice** in project selection and transparency (see NSW Auditor General's comments below). Calls for the release of the business case have been opposed by both the Federal and NSW governments. **If there is such a compelling business case, then why isn't it being shared with the Australian taxpayers who are bearing the risks associated with this project.**

The 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 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)

2.2 WestConnex Concept

"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)

2.3 Developing the business case

"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)

2.4 Gateway review of preliminary business case

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

(p.29)

Red: critical and urgent – project strategy to address the shortcomings/recommendations is to be established before project is further progressed.

Yellow: Important and urgent – project should go forward with action on recommendations. Source: WestConnex preliminary business case Gateway review 2013.

2.5 Matters a Gateway review may have identified

"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)

2.6 Purpose of the 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)

I reject the WestConnex project in its entirety as WDA have been unable to present any evidence of project viability.

2.7 Solution mode prior to analysis

The 'Captains Call' to build a road was decided without exploring other options from an expert analysis of Sydney's congestion problems. The intricate science of public transport was ignored, as well as decades of world experience that building motorways through an inner city does not solve congestion.

This project has had nothing to do with Infrastructure Australia's processes, nothing to do with a strategic approach to building transport, nothing about getting better economic productivity, let alone sustainability.

Tony Abbott and Nick Greiner have had a bizarre aversion to Public Transport, thus leading to this enormous Folly.

It is unacceptable that out- of-touch politicians and ex-politicians should jump into solution mode and decide to build the WestConnex motorway. Leaving RMS/WDA staff scrambling to find something (anything) to justify the project.

It is unacceptable that correct project procedures of understanding the core problem and identifying the best solution that meets the cost / benefit analysis was ignored.

It is unacceptable that the recommendations of Independent Infrastructure Experts were ignored.

It is unacceptable that a spend of $16.8 billion (plus) and 10 years of destruction and inconvenience for upwards one million people is justified with a Sydney road network improvement of just one kilometer per hour. (*source KGR M5 Vol 1 page v)

On this basis I reject the entire WestConnex project as not the solution to Sydney's congestion.

The failure to abide by the Major Projects Assurance Framework and employ best practice governance from project inception has greatly reduced community confidence. The Community is being asked to comment on an EIS that is deficient in analysis of project justification.

A condition of consent for the New M5 East should include adherence to the NSW Government's Major Projects Assurance Framework. Vital gateway reviews which 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.

Footnotes

1. Inquiry into Public Infrastructure, Productivity Commission (2014)
2. Submission to Select Committee into the Abbott Government's Budget Cuts, Marion Terrill, Transport Program Director, Grattan Institute (August 2015)

Abbott is now gone. Let's that the opportunity to conduct a Federal Audit of Westconnex, the ancillory works and complementary works. Then turn to investing our money, energy and expertise in Public Transport that will enliven Sydney, particularly the Western Suburbs.

2.8 Shutting down public scrutiny

As reported SMH 17 October 2015, the largest transport project in the country – WestConnex - is shielded from public scrutiny after the Government has transferred control to a "private corporation". The Sydney Motorway Corporation. There are no representatives of transport agencies on the Board. A Board comprised of Treasury officials, builders and financiers.

According to Labor's spokeswoman, Jodi McKay, it is "all about shutting down scrutiny". She has also commented that "I do not understand how they can call themselves a private corporation when they have two minister share-holders".

This era will be long remembered as a shameful corruption of the democratic process for NSW.

On this basis I reject the entire WestConnex project as it concerns me greatly the loss of transparency by transferring the delivery of the project to a 'private company'. This is not democracy.

2.9 AECOM and Conflict of Interest

Experts and academics have been critical of the AECOM traffic studies for this project, one complaining that there is insufficient information about assumptions behind the Westconnex Traffic Model for other researchers to test it independently.

This can only add to community unease about the EIS and planning process, especially because AECOM has not used the opportunity of the EIS report to respond to or engage with independent consultants as SCG Consulting that have questioned its traffic predictions for the WestConnex M4.ely on government departments to seriously evaluate the project and engage with critiques. Unfortunately, the Planning Department will publish the responses to the EIS on its website. Westconnex and

AECOM will then prepare a 'responses report'. Planners, health experts and others inside government say they will then be pressured to sign off on the EIS, although many know it is poor social policy.

The same firm is the subject of an ongoing legal action in Queensland – more than 650 investors are suing for $150 million, claiming the company's traffic predictions for a privately-owned toll-road in Brisbane were substantially inflated

Is it too much to hope that the Minister for Planning Rob Stokes and professional planners employed by the NSW government take time to seriously consider the substantial critiques of the project? From the public's point of view, it would be so much better to stop now rather than be stuck with another failed tollway project.

On the basis on questionable independence and integrity of the planning assessment process I reject the WestConnex project in its entirety.

2.10 Failed EIS Process

An EIS is supposed to honestly and fully discuss the costs and economic benefits as well as the social and environmental effects of a project as well as alternatives to it, but the EIS for the M4 East section, King Georges Road Interchange and the New M5 EIS is nothing more than a shoddy and evasive sales pitch.

I object because the whole process has been corrupted by the agencies who are its proponents. This is evidenced by, the awarding of contracts for the project, notice of compulsory acquisition of family homes and the planned destruction of local communities, all before the matter has been considered and approved.

These factors combined have left local residents feeling sad and angry about the process to date and left many feeling sceptical that there is any real concern about their rights and welfare. In addition no comprehensive business case has been presented and the arguments in the 8000 page EIS are simplistic and lack depth.

I object that the community was only granted 60 days to review the New M5 EIS. A minimum of 90 days should have been granted.

On this basis I reject the entire WestConnex project due to the failed EIS process.

2.11 Failure to engage in Community Participation & Discussion

It is unacceptable that the community and councils have not been engaged in meaningful dialogue and involvement in the future of Sydney and this project.

- The various so-called 'information sessions' have been a sham
- The information kiosks are not attended by informed staff

- The distributed material contains information meant to mislead.
- The distributed material is specifically designed to not advertise the project

WDA repeatedly quotes unsubstantiated 'benefits' across the entire project, yet downplays negative impacts to just the immediate section.

It is time that there is a meaningful discussion on transport infrastructure in this city. It is time to address demand management.

It is time in 2016 to ramp up the campaign to raise public awareness of a healthier and environmentally friendly commute to destinations. It is time that Urban Planning incorporates models of walkability when planning new suburbs. It is time that the public become very aware of the real cost of driving – both financially and the space that automobiles and roads take up. And, it is time to really penalise single passenger vehicles when public transport is available via (eg) via tolls and congestion tax.

It is time that our cities are returned to the people. Sixty years of priority has been given to automobiles and their domination of our landscape vs the livability of our suburbs.

I therefore reject the WestConnex project in entirety, as it has not been presented in a way that enables the public to determine if the proposal is an appropriate and effective solution for Sydney's significant transport problems.

2.12 Failure to disclose negative impacts in a timely and transparent fashion

WDA has been known to hide negative information that is essential for the community to form an opinion. Recent examples:

- Information kiosks at the shopping centers and information sessions:
    - Failure to incorporate the locations of unfiltered stacks in material
    - Failure to disclose the amount of greenspace and parks lost to the motorway
    - Failure to properly disclose the tolls & reintroduction of tolls on existing roads
    - Failure to disclose the number of people that will be displaced
    - Failure to disclose the number of businesses compulsory acquired and the jobs lost
    - Failure to disclose the method of calculation & definition of "up to 10000 new jobs" and failure to deduct the permanent jobs lost.
    - Failure to disclose that there is no appropriate monitoring of PM2.5 and less.
- Information distributed to Arncliffe residents failed to disclose the horrible impact on the endangered Green and Golden Bell Frogs.
- Confirmation that an unfiltered exhaust stack at Kingsgrove was planned. WDA staff member was very evasive to confirm that this was fact in June 2015.
- The eventual disclosure stating that this stack was located in an industrial area. No. It is a business park and located near nine schools and many homes and places of employment

2.13 Failure to incorporate Community Feedback from EIS

WDA have never incorporated community feedback in their designs, as evidenced by residents impacted by the KGR M5 Interchange at Beverly Hills. Even if data contained in the EIS was pointed out as incorrect.

- The response to residents was '*we will explain it differently, so you might understand*' our (flawed) vision.
- I object that all reasonable requests by Beverly Hills residents were denied on the grounds they were not reasonable or not feasible. The real answer is that the project is delivering the cheapest possible engineering design – at a permanent cost to residents.
- I object that the community and our local councils have been denied a voice.
- I object that residents have had to take extraordinary action to be 'heard'.
- Failure to address existing significant noise by refusing additional noise attenuation of transparent walls on the span the Cooloongatta Rd bridge replacing the wire. Rejected because it was too expensive (but happy to spend the money enhancing the motorists experience)

2.14 Failure to engage highly impacted residents during constructions.

There is a consistent effort by Westconnex Liason Staff in properly informing residents of construction impacts.

Residents of Elouera St Beverly Hills were not informed that heavy vehicles would be using their street. To add insult to injury, these trucks could idle in front of peoples homes. The longest was ONE HOUR. It is not good enough that multiple residents have to remind the construction company on a daily basis that idling trucks is a breach of conditions.

Failure to advise residents of Allambee Cresc South Beverly Hills that their park at the end of their street would be used as a construction zone. No letter drops. Just suddenly turned up one Friday morning and started tearing down the trees.

Thursday afternoon. Kids playing in the park at the end of Allambee Cres Beverly Hills

Friday afternoon. Park destroyed. And to add insult to injury, the workers did not turn down their high pitch reverse beepers. This was a condition of approval. Daily reminders to the Construction Company is not good enough!!

3 Project & Broader Westconnex scheme

1) The proposed New M5 and broader WestConnex scheme are not in the public interest.

1. Any personal travel time savings generated by the project will not benefit the economy, and will be cancelled out in time by induced demand and induced sprawl.
2. The New M5 will be used by less than one percent of the NSW population each day. The costs will be borne by the whole population.
3. 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.
4. There are numerous ways of spending $16.8 billion that would deliver a much greater social and economic benefit, and would not cause so much destruction.

2) The EIS authors (AECOM) have not modelled or objectively assessed alternative policy scenarios that could meet the transport/accessibility needs of NSW's growing population (individually or in combination), e.g.:

1. Greater investment in mass/public transport;
2. Demand management/road pricing reform
3. Land use planning that places homes, employment and services closer together

3) It is no secret that the primary 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 in the scheme as a means of paying for it (through tolls). However, there are various policy alternatives for dealing with the growing freight task that have not been objectively assessed in the EIS, e.g.:

1. Improve the capacity and reliability of rail freight.
2. Increase rail/intermodal freight subsidies to match those of road freight.
3. Divert container operations to other ports outside the city centre. It does not make sense to concentrate container operations in the city centre where road access is costly and has significant impacts on the surrounding residential areas. An expansion of the

Port Kembla container terminal, which already has good road/rail access, would stimulate the Illawarra region's economy.

4. Freight demand management, e.g., incentivise shorter supply chains and local supply.

4) The new intermodal terminals at Moorebank and St Marys, along with the planned upgrades to the Port Botany rail freight rail line, will significantly increase the share of freight that can leave/enter Port Botany by rail. Against this background, spending $16.8 billion on marginal improvements to road freight access must be questioned. Is the proponent (RMS) aware of the new intermodal terminals?

5) 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. In particular the assumed toll price, on which the traffic forecasts heavily depend, has not been stated.

6) 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. AECOM has a history of overestimating the willingness of motorists to pay for toll roads, resulting in overly-optimistic traffic forecasts and financial failures (e.g., Clem7).

7) There is **no modelling/objective assessment of the travel time and accessibility impacts for non-motorised modes (walk and bicycle)** in the Traffic and Transport Assessment

8) The issue of **induced demand** has not been adequately addressed in the Traffic and Transport Assessment.

9) Given the major flaws with the 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:

1. Air quality
2. Noise and vibration
3. Human health
4. Greenhouse Gases

10) The **role of motorways in a multimodal urban transport network is to allow traffic to circumvent populated urban areas, and to connect less densely populated areas** (where mass transit is not justified). For radial transport into and out of employment/activity centres, mass transit (e.g., rail) is faster, more efficient, requires less space, and has fewer impacts on highly populated urban areas.

11) **The EIS does not consider the cumulative costs and impacts 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:

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%.
2. Serious human health impacts due to petrochemical vehicle emissions/smog, including:
    1. Lung cancer,
    2. Asthma
    3. Heart disease,
    4. Impaired lung 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. Increasing numbers of people losing sleep due to traffic noise pollution.
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 areas/buildings.
12. Irreversible biodiversity loss.

13. Less incidental physical activity from walking and bicycling (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

4 WestConnex fails the objectives of the NSW Transport Master Plan

4.1 What came first – WestConnex or the Strategic Plans?

WestConnex is an anomaly to the NSW Transport Master Plan 2012

The WestConnex EIS claims that it was a legitimate part of the long term transport planning for NSW for which it is very obvious that it was retrofitted after the event.

The NSW Master Transport Plan December 2012 was written from the perspective of improving the mobility for residents and visitors to Sydney through the modernising and connectivity of Public Transport.

The focus mentioned frequently throughout the document was to reduce car dependency and thus congestion by investing further in the various modes public transport. The main initiatives were to address the lack of rail connectivity, by enhancing the current radial mode to be a more networked and connected system. It also included complementary improvements with other modes, such as increase dedicated bus lanes plus BRT, increased cycle-ways and encouraging walkability. The livability of communities and protection of the environment was a key outcome of the Plan.

"Most of Sydney's rail network was built more than 100 years ago and is primarily centred on servicing the CBD. There has been little recent expansion of the network, with 39 kilometres of the total CityRail system of 1,050 kilometres built in the past 33 years (as at 2012).. As Sydney has grown and evolved to a multi-centred city, its needs have changed and our rail system needs to evolve to keep up with these changes."

"Businesses often cite the lack of public transport connectivity as an inhibitor to establishing a presence in the three regional cities of Parramatta, Penrith and Liverpool, as well as precincts like Macquarie Park, Sydney Olympic Park and Port Botany".

"By enabling industries to set up in the regions, in transport terms, this would reduce the impacts of dispersed employment in Greater Sydney, alleviate car dependency and long commutes, and promote more liveable communities".

The below comments – lifted from the Master Plan – succinctly encapsulate the rationale of this Plan:

"Regular physical activity is important to our health and wellbeing. Recent research shows that many people get an additional eight to 10 minutes of exercise each day when they use public transport. Importantly, being active for part of our journey to work or school incorporates exercise into our daily routines. The NSW Centre for Population Health has observed that public transport use, walking and cycling are associated with a number of health benefits, including a reduced incidence of obesity, higher levels of exercise and improved mental health.

Building social and community goals into our transport planning will strengthen communities, reduce disadvantage and open up opportunities. To meet our objective of reducing social disadvantage, we will require new ways of thinking about how to distribute transport services more evenly across the State. We will need to give people healthier travel options, such as making it easier and safer to cycle to work or walk to the nearest train station. We will also need to integrate our transport system more closely with land use planning, creating well-designed cities and suburban centres that reduce our reliance on cars, encourage us to be more active and produce safe, attractive and well-used urban spaces".

The inclusion of the WestConnex project at various points throughout the document is an anomaly to the key rationale of the original document.

NSW Master Transport Plan Vision

"*The city will become more liveable by improving the design of buildings and public areas, developing mixed-use spaces where people work and live, and creating more opportunities for people to walk and cycle to work and major service centres. Protecting our natural environment, improving access to green spaces and improving air quality will be critical. The Metropolitan Strategy for Sydney underpins this land use and planning vision for Metropolitan Sydney to 2031.*

Central to these outcomes will be an integrated and efficient transport system that is closely aligned with land use planning. Sydney's transport infrastructure and services will cater to the customer, providing diverse transport options and reduced travel times, while being readily accessible across all parts of the city. Improved public transport networks will increase productivity and global competitiveness."

***"Improve sustainability** – by maintaining and optimising the use of the transport network, easing congestion, growing the proportion of travel by sustainable modes such as public transport, walking and cycling, and becoming more energy efficient"*

"For public transport - If Under a 'do nothing' scenario, most travel in Sydney would continue to be by motor vehicle, with roughly the same percentage of trips still made by car in 2031.

*"Transport has an important role in supporting Sydney as a global city. **Strong connectivity across the city, quality public transport networks and opportunities for walking and cycling can all contribute to maintaining Sydney's role as a centre of economic and social activity".***

"The city will become more liveable by improving the design of buildings and public areas, developing mixed-use spaces where people work and live, and creating more opportunities for people to walk and cycle to work and major service centres. Protecting our natural environment, improving access to green spaces and improving air quality will be critical.

*"Central to these outcomes will be an integrated and efficient transport system that is closely aligned with land use planning. Sydney's transport infrastructure and services will cater to the customer, providing diverse transport options and reduced travel times, while being readily accessible across all parts of the city. **Improved public transport networks will increase productivity and global competitiveness"***

The Master Plan also goes on with the rationale "Currently, ***around 14 percent of greenhouse gas (GHG)*** *emissions produced in NSW come from the* ***transport sector****, making it the State's* ***second highest source*** *of emissions. In the context of population growth and increasing travel demand, mitigating GHG emissions is a major challenge for the future".*

*"****Providing people with opportunities to use public transport instead of private vehicles*** *will help to reduce the environmental impact of transport in NSW. Increased walking and cycling, particularly for short, local trips, will also contribute to improved environmental outcomes."*

" *The cost and availability of oil and the rising cost of electricity will also have a direct influence on the choices we make in procuring the most environmentally sustainable and energy efficient technologies to power our transport fleets".*

"The growing travel task is also a challenge for preserving the amenity of many of our communities. The movement of freight is rarely silent and the generation of noise on a shared network in proximity to residential areas is a recognised issue".

The WestConnex project and its horrible impact on communities, vulnerable species and the environment is a complete juxtaposition to the vision for Sydney's mobility by Gladys Berejiklian (previous Minister for Transport)

Please explain HOW WestConnex fits into the above rationale

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 center 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 M5 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 centerpiece 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.

I strongly object to the WestConnex project, as it fails to match any of the required core outcomes of the NSW Travel Master Plan.

I strongly object to the WestConnex project as it represents a lost opportunity to "Get Sydney moving". The funds required to fully implement the exciting public transport projects that will significantly improve connectivity of rail; bus, cycle and walking opportunities as proposed by Ms Berejilian will not be available. Instead, funds are redirected to a road project that is a space hungry,

low volume mode of transport. It eschews Ms Berejiklian's rational plan for Sydney, instead resulting in the perpetuation of car dependency, more pollution, more traffic noise, more congestion, and more GHG emissions. It reduces the livability and amenity of our suburbs. It removes important greenspace and vegetation that is critical for the survival of vulnerable species and for the health and wellbeing of residents.

I point out that Inner-West Light Rail patronage has increased by 68% resulting in the need for 90 more services. How many cars has this infrastructure taken off the roads. The people voted. With their patronage.

I strongly object to the misrepresentation contained in the EIS that WestConnex was part of the NSW Transport Master Plan 2012. WestConnex was retrofitted in 2013, and was never a legitimate part of the long term plan scope.

5 The project fails to properly assess alternatives

To paraphrase a misattribution of Einstein ... the definition of insanity is to do the same thing over and over again, and expect a different result.

The SEARS provide for 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 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.

Finding: FAIL

Comment: The EIS does not include cost-benefit analysis, modelling, or any other objective analysis of feasible alternatives. Only cursory descriptions are provided.

No alternative staging strategies are described or objectively assessed.

6 Cumulative aspects and proposal's relationship to rest of Westconnex works

Details of the proposal's relationship to and consistency with the broader WestConnex, and an assessment of the cumulative impacts taking into consideration the WestConnex program of works.

Finding : FAIL

Comment: Cumulative construction impacts for the New M5 and other WestConnex projects have not been modelled/reported. Only a 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:
    1. Lung cancer,
    2. Asthma,
    3. Heart disease,
    4. 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.

7 Meeting objectives of the entire Westconnex

Finding : FAIL

Comment: finds that the project **FAILS** to meet the Westconnex objectives. This will be covered in Part 3 of this submission.

8 Impact of New M5 on traffic and transport after start of operation

Requirement: 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).

Finding : FAIL

Comment :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.

9 Induced traffic

Requirement: Induced traffic and operational implications for public transport (particularly with respect to strategic bus corridors and bus routes) and future public transport opportunities.

Finding : FAIL

Comment: 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 my 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.

10 Cyclists and Pedestrians

Requirement: Impacts on cyclists and pedestrian access and safety and consideration of opportunities to integrate cycleway and pedestrian elements with surrounding networks.

Finding : FAIL

Comment: 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 transport model (WRTM) nor the intersection models (LinSig). There is no forecast of the impacts on walking and bicycling travel times and accessibility.

11 Air Quality

Requirement: 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.

Finding: FAIL

Comment: 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.

12 Human Health Impacts

An assessment of human health impacts.

Finding : FAIL

Comment: 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.

13 Noise Impacts

Requirement: 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).

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.

13.1 Sydney has underinvested in public transport over the past 30 years

In 1998 the NSW government released Action for Transport 2010 an integrated transport plan for Sydney. The plan proposed to:

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

(Action for Transport 2010 an integrated transport plan for Sydney, 1998, NSW Government p.2)

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

(p. 3)

The plan listed (at page 5) 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**) and recently to Dulwich Hill

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)

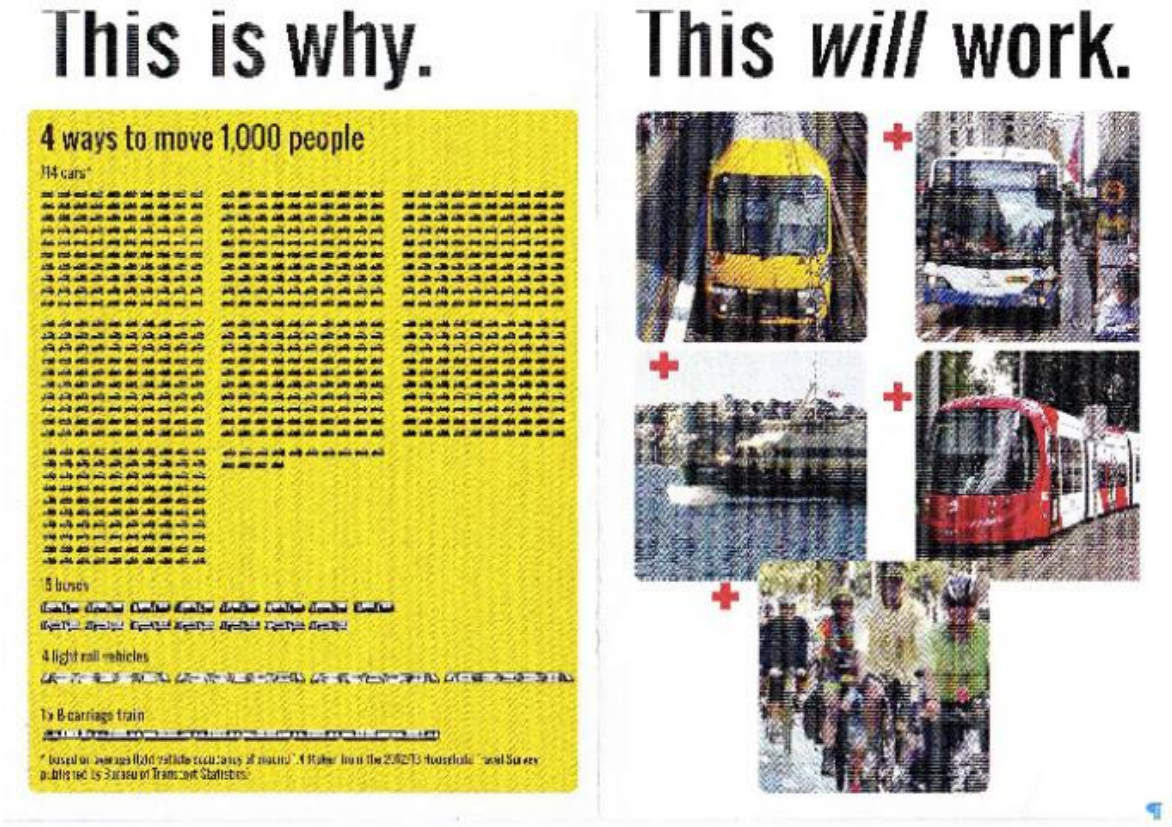
All the projects in bold were built. It can be seen from the list that every road project was delivered. Of the 16 public transport projects only four were completed.

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.

WestConnex clearly fails to:

- Reduce car dependency
- Meet the needs of our growing suburbs
- Get more people on public transport

The Benefit-Cost analysis of WestConnex is evaluated over a 40 year period. Relieving traffic congestion on the corridor appears to be a major objective of the project. The project reaches capacity in the M4 East tunnel within eight years after project completion. This does not seem to be an effective means of relieving congestion. The Cost-Benefit analysis should include costs of additional measures required over the **remaining 32 years of the project life** to maintain the claimed congestion and travel time savings. If included, it is likely that the **project costs will significantly outweigh any benefits.**



14 Failure to meet the stated project objectives

I <u>object</u> to the Westconnex project in its entirety as the core objectives are not met.

Westconnex has key objectives that the whole project is supposed to meet.

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.**

Westconnex's stated objectives have no associated targets by which their achievement can be ever be determined. For example, how can it ever be determined if the objective to "maintain regional air quality" has been met?

Objectives/targets need to be:

1. Specific

2. Measurable
3. Achievable
4. Relevant
5. Time-bound

Even though the objectives of Westconnex have been contrived to fit the project, the **project still does not meet them**.

Each objective below is accompanied by an explanation of why the project does **NOT** meet that objective. *(Ed: We counted them and there are 40)*

1. **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.**

- There is already an extensive and high–capacity 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 economical 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.

2. Relieve road congestion to improve the speed, reliability and safety of travel in the M5 Motorway corridor.

- 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 a new equilibrium between supply and demand is reached (i.e., congestion will return to its previous level)
- A better objective would be to give as many people as possible a reasonable alternative to sitting in traffic. How many people would really prefer to spend hours each week crawling along a dark tunnel inhaling truck fumes, than sitting in a modern train that takes them swiftly to their destination, where they can use the time to relax, read, work etc.
- 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 (4) than without it (3) in 2021.**

3. Cater for the diverse travel demands along these corridors that are best met by road infrastructure.

There is already more than sufficient capacity along these corridors to cater for all the essential vehicle travel. Non-essential vehicle travel could be discouraged through better demand management, e.g., road pricing reform.

4. Enhance the productivity of commercial and freight generating land uses strategically located near transport infrastructure.

- 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 them

be relocated to less populated areas, where the transport costs and externalities are lower?

5. Fit within the financial capacity of the State and Federal Governments, in partnership with the private sector.

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).

6. Optimise user pays contributions to support funding in an affordable and equitable way.

- 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.

7. Provide for integration with other WestConnex projects and the proposed Southern extension, while not significantly impacting on the surrounding environment in the interim period

- There will be significant impacts on the surrounding environment.
- 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.

8. Manage tunnel ventilation emissions to ensure local air quality meets NSW Environment Protection Authority (EPA) standards

- 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.

9. Maintain regional air quality

- 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.

10. Manage in-tunnel air quality to stringent air quality standards

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.

11. 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:
    1. Providing for energy-efficient transport modes (public transport, walking, bicycling).

    2. Land use planning that places homes closer to employment and other destinations.

12. 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.

13. Provide for improvement of social and visual amenity

- The project will reduce social and visual amenity.
    1. The concrete interchanges and pollution stacks will be visually obtrusive.
    2. The increased traffic volumes on surface roads will result in lower amenity (more noise pollution, more fear and intimation, increased crash risk etc.).

    3. 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.

14. Minimise impacts on natural systems including biodiversity

- The project will cause irreversible biodiversity loss.
- The project will contribute to climate change through increased greenhouse gas emissions. This will result in further biodiversity loss and damage to natural systems.

15. Protect surface and groundwater sources and water quality including management of contaminated areas

- The project will result in increased VKT (Vehicle Kilometres Travelled) , and therefore more contaminants (brake and clutch dust, hydrocarbon particulates etc.) being deposited on roadways and washed into waterways.

16. Reduce susceptibility to, and minimise impacts of, flooding

- 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.

17. 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

- The project is not a sustainable development.
    1. Not economically sustainable. The costs far outweigh the productivity benefits.

2. 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.

3. Not environmentally sustainable. It will result in higher greenhouse gas emissions and irreversible biodiversity loss.

14.1 Enhance the productivity of commercial and freight generating land uses strategically located near transport infrastructure

14.1.1 Failure to meet this objective

Freight benefits are an integral part of the justification for WestConnex, yet the New M5 does not go anywhere near Port Botany. It should be noted that when WestConnex was first reviewed by Infrastructure Australia it was classified as a freight project.

As detailed in the below section, with the majority of Sydney's the population located in the Greater West it makes better sense to transport the bulk of freight via rail, such as the utilisation of the planned new distribution center planned for St Mary's.

It is concerning that the Southern Gateway ancillory project will impact on the Southern Freight Rail Line requiring it to be moved by 500 meters. No details have been provided to the public as yet, but based on the outcome in Newcastle it is reasonable for the public to suspect the worst of impacts for a period of time to this freight line.

14.1.2 Freight by rail projects by private sector

According to a recent SMH article alternate investments are being made to move freight more efficiently and cheaply by rail from Port Botany.

A recent announcement by Asciano aims to have a second freight hub transporting containers by rail to Port Botany within 12 months, as it prepares to spend $100 million building a new intermodal terminal in western Sydney. This new 43-hectare hub, will be located in St Marys which is claimed as an ideal location for big retailers such as Woolworths, Coles and Bunnings, which have distribution centres nearby. It will be Asciano's second intermodal terminal in western Sydney after Chullora. The Chullora terminal started transporting containers on rail to the port two months ago.

The new hub's rail shuttle will have annual capacity of 300,000, 20-foot equivalent units (TEUs) annually. Chullora has annual capacity of 600,000 TEUs, including up to 135,000 TEUs that can run on rail to Port Botany. Chullora is running some 75,000 TEUs annually on rail to Port Botany.

At full capacity, moving freight from Port Botany by rail from Chullora could take up to 100,000 truck journeys off roads every year, according to Asciano chief executive John Mullen.

A much-bigger competing freight terminal will be opened at Moorebank by logistics group Qube and rival rail group Aurizon in late 2017.

The distribution centres at both Chullora and Moorebank are better suited for distributions in the inner west. Mr Mullen stated that with "most of the distribution centre activity is further north-west" then it makes sense to transport via a cheaper and more efficient rail mode.

The WestConnex project will perpetuate an inadequate, antiquated and highly congested transport route that will not meet the needs of the freight transport industry and the people of Sydney and NSW. The Freight Industry recognises this, and have embarked on their rail projects that will better support Sydney's global economic corridor. Why does this Government and the RMS not recognise 21st century solutions to our congestion problem?

: http://www.smh.com.au/business/asciano-spends-100m-on-expanding-sydney-freight-hub-network-20151008-gk44qp.html#ixzz3oFxu8ITj

14.1.3 NSW Government has failed in aim to increase freight by rail

The NSW government has failed in its aim of moving an increasing proportion of freight throughout Sydney on rail, leading to more heavy trucks on the road. This outcome, which Roads and Freight Minister Duncan Gay concedes is a "slight embarrassment", comes amid rapid growth in the volume of goods and commodities being moved through Sydney's container port at Botany.

The state Coalition government wants to lift the share of containers moved through the port from 14 per cent to 28 per cent by the start of the next decade. This is a downgrade from the former government's target of 40 per cent, which it never got close to meeting. But over the life of the O'Farrell and Baird governments, the rail share of containers has remained stuck at about 14 per cent. Asked about the failure to lift the share at budget estimates about the failure to lift the share, Mr Gay said: "We believe we will do it, but we are a long way off at the moment."

Mr Gay attributed the failure to move a larger share of goods by rail to improvements in truck access to the port, which started under a program set up by former ports minister Joe Tripodi.

"It is success in one area that has stopped progress in another," Mr Gay said.

The executive general manager of NSW Ports for planning and infrastructure at NSW Ports, Marika Calfas, attributes the number of trucks due to the lack of terminals to transport containers by rail, and to a lack of regulation. "We need the facilities out there to increase capacity," Ms Calfas said. "We need to be able to take the boxes somewhere."

14.1.4 Decades of underinvestment in freight rail

Tony Abbott - in his 2009 book *Battlelines*, the "humblest person is king in his own car". He went on to dismiss outright the practicality of public transport in Australia's sprawling cities: "Mostly, there just aren't enough people wanting to go from a particular place to a particular destination at a particular time to justify any vehicle larger than a car, and cars need roads."

Despite this assertion, the new Sydney motorways partly funded by the Road-focussed Abbott government are being built in the most densely settled parts of Sydney. The NorthConnex and WestConnex involve building very long tunnels. All are likely to ignore the safety recommendations from the coronial inquest by Judge Jennifer Coate into the three-truck pile-up inside Melbourne's

Burnley tunnel in 2007. Between them, the projects involve more than 23 kilometres of new tunnels. Coate urged governments to build tunnels with dedicated emergency lanes and to eliminate the need for lane-changing, but the NSW government has shown that such features won't be included.

The relentless rise of heavy vehicles in Australia's transport system over the past four decades has occurred in part because Australia has no proper charging system, and because governments have starved the publicly owned rail-freight system of investment. As a result, rail's share in moving the goods that Australians buy every day has steadily declined, while the volume of road freight has increased almost tenfold over the past 40 years, to 203 billion tonne kilometres.

This development is in marked contrast with the situation in the United States. The US still moves about 40% of its intercity freight via rail. The US rail system is one of the most efficient in the world, and it is also profitable. It's such a good business that the shrewd investor Warren Buffett recently sank $US26.5 billion into buying a rail company.

Australia's shift to the roads has locked us into a freight system that is inherently more costly, more carbon intensive and more dangerous. Figures published by the federal government's Bureau of Infrastructure, Transport and Regional Economics (BITRE) show that the cost of moving 1 tonne of freight by road over a distance of 1 kilometre (known as cost per tonne kilometre) is 7.5 cents for road, more than double the 3.5 cents for rail. The greenhouse-gas emissions for road are more than triple those for rail: 52 grams per tonne kilometre versus 15.

This road-dependent freight system also means that Australia's cost of living is much more exposed to oil price rises. The carbon-intensive nature of the system makes it vulnerable to any future moves to introduce international trading systems or other regulations for greenhouse emissions.

There's also road dependency's cost to human life. In the five years to 2011, the average number of fatalities from Australian road accidents that involved a truck of more than 4.5 tonnes was 239 a year. The comparable number for rail, including passenger trains, was 34 deaths a year, which is remarkably low given that rail moves greater tonnage than road when bulk commodities such as minerals and grain are included. This means that trucks cause around 20% of all road fatalities in Australia even though they make up only 2.5% of the vehicles on the road. The number of people injured in such accidents continues to rise. In 2008–09, the latest year for which injury data is available, 1536 people were hospitalised after accidents with trucks. Accident victims classified as suffering a "high threat to life" totalled 551 in 2008–09, an increase of 18% in eight years, according to a 2014 BITRE report.

BITRE predicts a further 50% rise in the number of trucks on our roads over the next 15 years. Despite the urgent need for policy action, the wheels of government are moving slowly.

Two key reforms would give Australia a less costly, less dangerous and more climate-friendly freight system, and they are related. The first is distance-based charging for heavy vehicles, and the second is the construction of an inland rail line between Melbourne and Brisbane, which would avoid Sydney's notorious congestion and the 19th-century coastal rail line.

Trucking has become so dominant that even the trucking companies are saying that it's in their interest to shift more freight onto rail. Fox and his company executives declined to answer a series of questions put to them, and Abbott would not comment on his relationship with Fox. But back in 2009, Fox broke ranks with the industry, and the Abbott view, and said Australia had to shift back to rail if it were to have a viable freight system.

"I'm talking against myself when I'm talking about putting things on rail," Fox told a forum at the National Press Club. Fox backed the inland rail line, but he also advocated making greater use of coastal shipping, transferring more of Sydney's trade activity to Newcastle or Wollongong, and shifting Melbourne's major port to Hastings on the Mornington Peninsula. In the early '70s, about one-third of the freight moved between Victoria and Queensland went by sea, but that has now fallen to nil. He said Australia could learn a great deal from China, which has built deep-water ports away from major cities. "We do need to move away from running transport operations in the centre of the city, particularly on the east coast of Australia."

Fox expressed what might be the vain hope that he would see **sensible reform** happen in his lifetime: "We're only here for a short time. I've got probably less than ten years to go. I'd certainly like to see some of these things that are in the **interests of the nation."**

Without the NSW Government investing in the right infrastructure , ie to invest in a more efficient movement of freight around our state and country – instead of the antiquated and polluting motorways, our country will continue to decline in profitability.

http://www.smh.com.au/nsw/more-trucks-on-sydney-roads-as-government-fails-to-hit-rail-share-targets-20140921-10jyab.html#ixzz3pDnELmvV

https://www.themonthly.com.au/issue/2014/december/1417352400/paul-cleary/roads-nowhere

14.2 Fit within the financial capacity of the State and Federal Governments, in partnership with the private sector

14.2.1 Failure to meet this objective

The WestConnex motorway is the wrong transport project for Sydney's future, a report commissioned by City of Sydney Council says.

The report argues the WestConnex motorway is unlikely to reduce traffic on local roads, exposes the taxpayer to huge financial risk, and will not benefit many western Sydney commuters. Journey-to-work figures analysed by SGS show only about four per cent of workers in suburbs such as Penrith, St Marys and Camden travel to the CBD. Moreover, about 90 per cent of these work trips to the CBD from the west are using public transport.

SGS's report also says “WestConnex shares characteristics with other motorways that have financially failed, such as the Lane Cove Tunnel, Cross City Tunnel and Clem 7 in Brisbane, exposing the taxpayer to risk”.

Principal of SGS Terry Rawnsley said a metro rail line along Parramatta Road between Westmead and Central would be a better fit for the city than a new motorway.

"It's the biggest transport project in Sydney's history and you want to be sure it is going to be an economically viable project. There's a lot of questions that someone needs to answer."
http://www.smh.com.au/nsw/nsw-state-election-2015/westconnex-the-wrong-project-for-sydney-report-says--invest-in-public-transport-instead-20150223-13m8f0.html#ixzz3ooycRRlG

I consider 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

It is reasonable for the Public to be very concerned about the financial viability of this project. Already the cost has blown out from $10 Billion to $16.8 Billion. It is apparent that the NSW Government is continuing to throw more and more money at the project, as traffic modelling continue to reveal that the project will not address Sydney’s congestion issues.

I reject the entire WestConnex project on the basis that the expected cost benefit ratio is less than the dollar and thus a waste of our NSW taxes.

15 Traffic Assessment

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 (area that is analysed) 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 (signals to regulate flow onto the ramps) 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.

16 Comments on specific sections

(The references here are to sections in Appendix G)

a) Appendix G, Section 3 Strategic Context 4.2.1

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); asingle 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.

b) Appendix G, Assessment methodology, 4.2.2

- 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. What toll prices have been assumed?
- The study 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.
- **Insufficient detail on the Value of Travel Time Saving (VTTS)/Willingness to Pay (WTP) model:**
    1. What are the form and parameters of the model?
    2. If it was based on stated preference surveys, then how has the issue of hypothetical bias been addressed?

3. Has the model been validated? Previous toll choice models in Australia have overestimated WTP for toll roads.
4. Does the model include the negative utility of the tunnel environment (monotony, no natural light, poor air quality)?
5. What value of WTP has been used in the WRTM?
6. What is the confidence interval around the WTP value used?
7. 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.

- **Why has the weekend period not been modelled, when current weekend traffic volumes are higher than weekday traffic volumes in some places?**
- **Insufficient information about the travel zone structure in the Westconnex Road Traffic Model (WRTM)**
    1. What are the travel zones based on? How big are they?
    2. How are intra-zonal trips modelled?
    3. How are trips to/from external zones modelled?

- **Induced demand has not been adequately addressed.**
    1. 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/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 my 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.

- **Insufficient detail on origin-destination demand matrix generation:**
    1. What are the form and parameters of the generalised cost function?
    2. How were shortest paths calculated?ion:
- **Insufficient detail on trip generation:**
    1. What are the form and parameters of the trip production function, and how was it estimated?
    2. What are the form and parameters of the trip attraction function, and how was it estimated?
    3. How were trip productions and trip attractions balanced?
- **Insufficient detail on trip distribution/modal split:**
    1. What are the form and parameters of the gravity model used?
    2. What are the form and parameters of the deterrence function used?
    3. How has modal split been estimated?
- **Insufficient detail on road traffic assignment:**
    1. Is assignment stochastic or deterministic?
    2. What link loading/flow function was used? What parameters were chosen?
    3. Were intersection delays included?

- **Insufficient detail on public transport assignment:**
    1. How were access and egress points determined?
    2. How were route strategies determined?

- **Non-motorised trips (pedestrians, cyclists) were not included in the WRTM or LinSig modelling. (**LinSig is a traffic modelling package for the assessment and design of traffic signal intersections, either individually or as a network that comprises of a number of intersections.**)**
- **Impacts on accessibility have not been modelled/assessed.**
    1. Most transport is not an end in itself – it is a means to access work, education, services etc. How does the project affect accessibility?

- **Equity and equality impacts not described.**
    1. How many people have better accessibility with the project?
    2. How many people have poorer accessibility with the project?
    3. Do benefits/impacts accrue to any population groups more than others, e.g., people with a disability or on low incomes?

- **Downs-Thomson Paradox is not considered (*Ed: According to the Downs-Thomson paradox, improved road capacity increases travel times because it attracts more users to the road and away from public transport.)***
    1. The project will attract passengers away from public transport to driving. 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.

- **No sensitivity analysis. (*Ed: The parameter values and assumptions of any model are subject to change and error. Sensitivity analysis , broadly defined, is the investigation of these potential changes and errors and their impacts on conclusions to be drawn from the model.)***
    1. 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?

c) Section 7 Assessment of construction impacts 4.2.3

- **Impacts on travel times for all modes (driving, public transport, walk and bicycle) have not been assessed/reported. The construction activities (*Ed: in some cases over three years*) will delay travellers in a number of ways:**
    1. Additional construction/workforce traffic.
    2. Temporary road and lane closures.
    3. Speed limit reductions.
    4. The 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. (*Ed: The M4 East construction period coincides would coincide with the New M5 project if approved)***

d) Section 8 Future conditions without the project

- **Has the impact that the forecast decreases in LoS will have on travel demand been fed back into the demand model? The decreases in LoS will reduce travel demand by influencing a number of long and short term travel choices:**

1. Home location choice;
2. Work location choice;
3. Destination choice;
4. Mode choice;
5. Departure time choice; and
6. Route choice.

As such, it is unlikely that the future 'do minimum' scenarios will be as bad as claimed. We know that congestion is self-limiting – as LoS declines, travellers will adjust their travel behaviour/choices to avoid congestion.

- **Tables 69, 70, 74, 75, 77 and 78 do not include the base year (2012) values, so the future 'do minimum' scenarios cannot be compared with current conditions.**

Table 79 WRTM screenline comparison between 2021 'without project' and 'with project' AWT volumes

Direction	Location	2021 'without project'	Share	2021 'with project'	Share	Change
Western Screenline						
Eastbound	Canterbury Road	23,643	22%	25,688	24%	9%
	M5 East Corridor (including M5 East Motorway and New M5)	57,764	54%	50,104	47%	-13%
	Stoney Creek Road	13,549	13%	19,230	18%	42%
	Forest Road / Queens Road	12,218	11%	12,108	11%	-1%
	Total	**107,174**		**107,129**		**0%**
Westbound	Canterbury Road	24,206	22%	25,895	24%	7%
	M5 East Corridor (including M5 East Motorway and New M5)	58,125	52%	48,424	45%	-17%
	Stoney Creek Road	13,496	12%	17,068	16%	26%
	Forest Road / Queens Road	16,513	15%	16,692	15%	1%
	Total	**112,340**		**108,079**		**-4%**

Ed: Where is the baeline? What are current conditions? Note also the shift in traffic to Stoney Creek Road that is already congested

- **Tables 72, 73 and 76 use 2014 as the base year, instead of 2012 as used elsewhere in the EIS. To understand the impacts of the project, a consistent baseline must to be used.**
- **An assessment of the impacts on walking and bicycle demand and travel times has not been provided.**

e) Section 9 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.

f) Section 10 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,

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/reported. Only performance measures for the immediate area around the St. Peters Interchange have been reported. Without this information, the
- An assessment of the impacts on walking and bicycle demand and travel times has not been provided.

References

1. Newman P, Kenworthy J. Costs of automobile dependence: global survey of cities. *Transp. Res. Rec. J. Transp. Res. Board* 1999;1670(1):17-26. doi:10.3141/1670-04.

16.1 Optimise user-pays contributions to support funding in a way that is affordable and equitable

16.1.1 Failure to meet this objective

WestConnex perpetuates car dependency.

I certainly do not have an issue with tolls or congestion taxes – but you must have a decent integrated public transport solution available first. Initiatives contained in the NSW Transport Master Plan (ignoring the retrofitted and contradictory westconnex) and Eco Transit Sydney would have enlivened the ability for people to get from A to B without via Central. Recent examples of the popularity of public transport – Gold Coast Tram. Green Square & Mascot stations once fares were reduced to standard and inner west light rail

WestConnex means that families in the West will need to find $100 - $200 per week to travel to work. Yet I – with public transport & Opal – pays $33.60 per week giving me free travel 3 days per week.

This is inequitable. Greater Sydney will continue to be in congestion – but now have to pay.

The New M5 means that our local roads will be awash with additional induced traffic, that are avoiding the tolls.

On this basis, I reject the entire WestConnex project in its entirety as it does not meet the objective of fair and reasonable access to transport for Greater Sydney.

16.2 Integrate with the preceding and proposed future stages of Westconnex, without creating significant impacts on the surrounding environment or duplicating any potential issues across the construction periods

16.2.1 Failure to meet this objective

There are large sections in our community that will endure up to 10 years of construction (destruction) in their community with 24/7 activity.

The EIS provides no mitigation or solution (apart from counselling).

10 years is a significant impact on a highly populated sections of the populace and should have been given greater weight for reasons not to proceed with WestConnex.

The myriad of road works – The Southern Gateway, Southern Extension, and complementary road works means our communities will endure long term construction for no benefits.

The lack of any evidence contained in the EIS on how this objective can be met, but anecdotal evidence proving otherwise, I therefore reject the WestConnex project in its entirety. This is a highly destructive and intrusive project for over one million people. That is not a 'few cracked eggs'

16.3 Protect natural and cultural resources and enhance the environment.

16.3.1 The WestConnex project does not meet this core objective

Features of the M5 East project include: Widening roads; unfiltered exhaust stacks close to homes, schools and aged care centres; destruction of trees; temporary and permanent loss of greenspace; induced traffic onto local roads; impact on wetlands, groundwater and endangered species; exposing residents to prolonged high impact acute noise 24/7; hundreds of significant truck movements a day impacting on the safety of residents particularly primary school children; isolation; community dislocation; car dependence.

None of these factors enhance the environment. In fact, this proposal has a very significant negative impact on the urban and natural environment where over a million people.

16.3.2 Sectional planning approach

I **object** to the sectional planning project approach to the 33 kilometre Westconnex motorway. This prevents serious consideration of the impacts of the larger Westconnex project. **While broad justifications for the whole project are used to justify local threats, there has been no overall analysis and evaluation of the environment threats from the whole project.**

16.3.3 Social Impacts

- Hundreds of homes 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.
- There is growing scientific evidence that excessive noise can damage short and long term health
- Road pollution is a significant contributor to overall pollution; living or working close to congested roads is a health risk; some roads that would be negatively affected by the Westconnex New M5 are already polluted.
- There is strong scientific evidence that air pollution, especially PM 2.5 and PM 10 are linked to increased risks lung disease, impaired lung development, strokes, cancer and other forms of respiratory illness.
- The EIS acknowledges that Stoney Creek Road, King Georges Road, Campbell Street Euston Road Alexandria and other roads will become more polluted. In some cases, air pollution is already at unhealthy level.
- Instead of tackling the issue of Sydney's pollution, the Baird government is planning tollway after tollway for Sydney. This will leave many people, especially those in Western Sydney, in a car dependent situation. This is unhealthy.
- Leightons/CIMIC, who have been awarded the contract before approval, decided that ventilation stacks should not be filtered although tollway projects in other countries have ventilation stacks which filter emissions. The EIS asserts that there will be very low ' negligible' emissions in local areas from the stacks. One reason engineers give for filtering tunnels is to protect residents in high buildings or land. In this project, some residents live on hills (Kingsgrove) and others (e.g. in Arncliffe) live in high buildings. There are experts who say that stack emissions are not safe and should be filtered.

- Increases in traffic will spill over into other roads and streets but because the traffic modelling only extends to two intersections past the boundaries of the Westconnex project, these increased levels have not been modelled or presented in the EIS.

As well, the assessment of air quality and noise impacts are completely dependent on the traffic modelling. The traffic impacts are uncertain and for this reason, **the air, noise, social impacts and health risk assessments cannot be regarded as reliable.**

Air concerns: [redacted] protest at McCallums Hill Primary School about the WestConnex project. Picture: Chris Lane

These children will be exposed to elevated levels of dust and pollution at home and school. A construction zone a few metres from their home. Heavy truck movements past their school. Four trucks every minute during off-peak. And on completion, exposure to dangerous unfiltered exhaust from the chimney stack.

16.3.3.1 Home acquisitions

Home Owners (reported in the media) claim that lower than market value is offered for their homes and that they are bullied by RMS staff. Longstanding communities members are being forced to move far from their social networks.

Renters are also having to seek legal advice for relocation compensation. One long term renter in the same home for 18 years was only offered $5000 to relocate.

The disadvantaged residents in social housing (including independent homes for people with special needs) of RMS property have not had their needs addressed in the rush to evict hundreds of people from their homes.

Most of these people forced from their homes will likely find they have to move some distance away from where they have established support networks. This would be particularly hard on the frail and elderly.

I object to the mitigation of offer of 'counselling' which even if it does exist (and some say it has not been offered to them) would be of little assistance.

16.3.3.2 Unsafe Removal of Asbestos**.**

This dangerous substance has been located in several locations across the Westconnex project already. There is evidence that trucks removing asbestos have not been following appropriate safety standards such as sprinkler systems, washing down trucks before departure, and neglecting to properly cover loads.

I object to the contempt Westconnex has shown for the health and safety of residents within the locations and on route to Erskine Park where soil contaminated with asbestos has been dumped without being wetted or properly covered at the time of disposal.

The asbestos strongly suspected in the Earth Mound at Kingsgrove is a significant concern to all.

16.3.3.3 Divisive Infrastructure

I object to a 'solution' that results in a dreadful outcome on the amenity for all impacted suburbs. A wide, dirty and noisy toll road and the spaghetti interchanges thrust through suburbs that form part of Australia's 19th and 20th century history including the destruction of heritage listed homes and historic buildings.

16.3.3.4 Mental Health

The stress imposed on people by the Westconnex will increase the likelihood of anxiety and depression. The grief people will experience watching the suburb and urban landscape they love permanently destroyed has not been sufficiently addressed in the EIS social impact statement.

The permanent impact of this toll road on thousands of people's physical and mental health through

- visually divisive spaghetti interchanges
- noise barriers -that we know little care to landscaping for residents will be addressed –ref M5 KGR landscape design aka bare noise walls
- prominent and unfiltered exhaust stacks a constant reminder that residents and workers and their families are being poisoned by high levels of pollution
- loss of accessibility by pedestrians and cyclists
- impacts on the elderly for mobility, safety, connectivity and isolation
- impacts to the community and schools with the loss of neighbours
- impacts on the significant number of people forced to leave their home and community – loss of social networks and loss of school mates.
- stress and anxiety brought on by living in a permanent high noise and highly polluted environment.

16.3.3.5 Social Infrastructure

Stated mitigation - Landscaping treatments for the benefit of residents. Let's revisit the landscape design of the King Georges Road Interchange – hundreds of metres of bare noise walls because it is easier for the maintenance crew to inspect. Never mind the residents or professional pride or genuine appreciation for the huge disruption caused to residents. Ugly bare walls.

I object to the likely outcome facing residents of the landscaping treatments being a typical, visually divisive structure.

16.3.3.6 Loss of vegetation

I object to the loss of any vegetation planted as part of the rehabilitation/landscaping works following the construction of the Westconnex motorway. I have often been forced to travel on the M4 between the Sydney and the Blue Mountains. Over many years, I have watched side vegetation grow and provide visual relief, shade and refuge. I object to watching this vegetation being torn down, especially as once upon a time, the construction of the M4 motorway was then supposed to be the

answer to Sydney's east/west transport problems. I object that this existing motorway vegetation is seen to have no real value within the EIS.

I object to the destruction of significant tracts of parks and trees for the New M5.

I object to the impact upon the habitat of birds and animals which live, forage and shelter amongst the vegetation and trees to be lost due to the construction or operational needs of the project.

16.3.3.7 Car Dependence

Build a city for the people – and they will come. Build a city for cars – and congestion will prevail.

Ironically, it is these suburbs – targeted for destruction by Westconex – that demonstrates what the NSW Govt should be the planning for new outer suburb communities. The walkability factor - with ready public transport and local shopping centres. Local employment opportunities or employment centres (including high value jobs) within 60 minutes by public transport. Shared community spaces for gardening and leisure and social connectivity. Cultural and entertainment facilities for all ages.

The infrastructure planning for the new western suburbs, such as near Camden is woeful, with only 7% of Camden residents using public transport. Westconnex promotes socially isolating car dependence and the environmental impact of ever increasing traffic noise and air pollution – and does not provide residents of the western suburbs with any relief from congestion.

I object to this proposal as it is the wrong project for the wrong time.

16.3.3.8 Biodiversity and natural environment

Australia has the notorious distinction of having possibly the worst extinction record on earth according to Richard Kingsford, professor of environmental science at the University of NSW. This is predicted to continue without serious changes to the way we conserve our environment

16.3.3.9 Biodiversity effects are defined narrowly in focusing on potential impacts on Threatened Species.

Methodology and EIS statements re "the highly modified nature of the project footprint"

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.

The EIS field surveys (observations in the field) are very limited in duration and season (as usual in an EIS) – the "short duration of surveys" is acknowledged as well as **"it is possible that seasonal**

species were not identified"(20-3): for this EIS it was 1 day (12/2/15: no number of hours specified) and one night (27/2/15: also no duration specified) in one area (not specified where), with additional surveys on 12/3/15 and 26/6/15 "to investigate areas not covered by the previous surveys" (20-3). (It is not specified where if a physical location is referred to, nor whether it was day or night, and the duration).

Repeated sampling over some time period is really needed to develop anything representing a comprehensive survey. And if you are not (inclined to be) looking for it, you don't tend to find it, and if you are quite time limited as all EIS's are, you are falling well short of what is a satisfactory, let alone a rigorous survey process.

16.3.4 Endangered Fauna

16.3.4.1 Green and Golden Bell Frog

THE endangered Green and Golden Bell Frog is under threat as secret plans to build the WestConnex toll road through one of its last remaining habitats were quietly lodged to avoid public scrutiny.

The Green and Golden Bell Frog was once the most common frog species in the Sydney region but it now reduced to only two secure populations in the Sydney region – Kogarah and Homebush

The proposed development for WestConnex occupies the same area as the Green and Golden Bell Frogs on Kogarah Golf Course. Out of the seven locations where they 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. Further the only two locations that are not impacted only supported small numbers of frogs. 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.

Scientists are studying several species of Australian frogs - including the endangered green and golden bell frog - whose skin secretions are toxic to the multi-drug-resistant golden staph know as MRSA. The GGBF secretions may be the wonder drug of the 21st century. Yet, the overall WestConnex project will more than likely be responsible for the extinction of such an important species, as part of the M5 East section.

THE endangered Green and Golden Bell Frog is under threat as secret plans to build the WestCONnex toll road through one of its last remaining habitats were quietly lodged to avoid public scrutiny.

16.3.4.2 Rare Grey Headed Flying Fox

The EIS acknowledges that **Grey-headed Flying-foxes (GHFF)** use the area when foraging for food. An evening field study, consisting of two evenings only, confirmed this.

The project footprint is well within the nightly foraging range of the Clyde/Duck River camp, as well as other urban Sydney GHFF camps.
Urban GHFF camps have become important to the survival of the species which is now classed as Vulnerable under Federal and State legislation.
Neither street trees nor private garden trees have been included in loss of area calculation (see more on this below). Trees in these "unaccounted for" areas can be and are very important food resources for GHFF feeding.

This foraging habitat should have been quantified in their assessment and their conclusion re GHFF foraging habitat impact. As a result the area and significance of foraging habitat has been understated. On 20-16, the EIS states that "These planted trees do not constitute habitat critical to the survival of

the Grey-headed Flying-fox."

As there is currently no declaration by either the NSW or Federal Government as to what constitutes critical habitat this statement is disingenuous.

Stating under the heading Cumulative Impacts (20-20) that the combined Westconnex projects would result in "the removal of mainly planted vegetation and associated fauna habitats" (20-20) is not an adequate assessment of the whole Westconnex's project impact on Grey-headed Flying fox foraging habitat.

This species in its increasingly urban environment relies on much planted vegetation. Indeed the number of urban camps now in the Greater Sydney area is a result of the available food provided by such urban planted landscapes in proximity to camps – themselves also located in some cases amongst planted vegetation, especially as suitable habitat elsewhere in the species range has significantly contracted since European occupation (estimated at 50 % loss: Eby,P).

The whole Westconnex project – combined M4E and New M5 will impact on urban GHFF foraging habitat to a significant degree.

Grey Headed Flying Fox by Andrew Meares

16.3.4.3 Eastern Bentwing Bat

The impact on this species will be the loss of foraging habitat and the disturbance of roosting sites. Again, as similar to all of our native animals within Sydney metro, the significant and continued loss of vegetation will have a serious impact on these local communities.

16.3.4.4 Micro – bats (Large-footed Myotis and Eastern Bentwing Bat)

Given the very limited field surveys undertaken and poor quality recording of calls during these, the EIS cannot substantiate claims about the extent of use of existing infrastructure as roosting sites, nor claims about breeding habitat. The EIS claims there is no breeding habitat in the study area, but a breeding habitat can also include roof and wall cavities in the absence of tree hollows.

Nor is there substance to the claims about re-colonising new roosting sites eg. continuing to use culverts post construction disruption (20-16). There is no evidence quoted to indicate this will happen.

16.3.4.5 Statement that vegetation connectivity is limited

Some animal species manage quite well in small and fragmented patches, 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. Given the EIS has not quantified nor assessed the ecological role of private gardens and street plantings (see above), EIS comments about connectivity do not tell the whole story and so the potential connectivity (and ‘stepping stones’) that exist via this vegetation is ignored.

16.3.4.6 Cooks River Castlereagh Iron Bark bushland

Another cumulative impact on our natural environment, with the loss of a critically endangered stand, a development condition of the first M5, will be destroyed.

Threatened Flora - **Cooks River Clay Plain Scrub Forest**, located north of the M5 East Motorway, was significantly impacted by the original M5 construction. The remnant remaining is in good condition and is used by the Grey Headed Flying Foxes for foraging.

The Scientific Committee, established by the Threatened Species Conservation Act, had made a final determination to list the Cooks River Clay Plain Scrub Forest as an ENDANGERED ECOLOGICAL

COMMUNITY on Part 3 of Schedule 1 of the Act. Listing of Endangered Ecological Communities is provided for by Section 12 of the Act. (THREATENED SPECIES CONSERVATION ACT 1995 No 101)

Noted by the Scientific Committee that they are of the opinion that Cooks River/Castlereagh Ironbark Forest in the Sydney Basin Bioregion is likely to become extinct in nature in New South Wales unless the circumstances and factors threatening its survival or evolutionary development cease to operate and that the community is eligible for listing as an endangered ecological community.

The community had worked hard to save this from M5 version 1.

16.3.4.7 Rosecomb – at Wolli Bush found

Some months back, Fungi displaying a rare abnormality linked to vehicle pollution have been found near the existing M5 emission stack at Turrella.

Joanna Robinski of WCPS likens Rosecomb to a dead canary in a coalmine. "Finding Rosecomb is another wake-up call for local residents," she said. "Since 2012, when the World Health Organisation upgraded the status of diesel fumes to the highest level of human carcinogenicity, we've had confirmation of the ill-effects of pollution. This provides further evidence that living alongside emission stacks negatively impacts the biota of our environment as well."

The abnormal fungi – found only near the stack – needs further assessing.

16.3.4.8 Ramsar Wetlands

Wetlands provide significant economic, social and cultural benefits. They are important for primary products such as pastures, timber and fish and support recreational and tourist activities. Wetlands also help reduce the impacts from storm damage and flooding, maintain good water quality in rivers, recharge groundwater, store carbon, help stabilise climatic conditions and control pests. They are also important sites for biodiversity.

Wetlands cover about 9% of the earth's surface and are estimated to contain around 35% of global terrestrial carbon. Wetlands act as sinks for carbon dioxide and other greenhouse gases, especially if their vegetation is protected and their natural processes are maintained.

Without biodiversity the variety of all life forms, local ecosystems and in turn, human societies, cannot survive. Although highly urbanised, the City has retained several small **bushland** and **wetland** areas which play an important role in terms of providing food, habitat and shelter for native animals. These areas are deemed to have 'conservation value' (meaning they are worth preserving for future generations) because they represent ecosystems that would otherwise be lost.

The proposed F6 extension (which is referred to as a given in the EIS although it is not even in early stages of planning) will likely also impact on the Rockdale wetlands – another significant loss to our natural and human environment.

I object to the sectional approach taken to the Westconnex project which makes it difficult to properly assess the cumulative impact on our wetlands across both Westconnex and Southern Extension

I object to the unwarranted destruction of what remains of our natural environment for a project which is managed by politicians and business people who continue to hide the business case on which it is based. Westconnex managers have been unable to properly debate or refute the many informed critiques of the project.

16.3.4.9 Conclusion

In an age of shrinking backyards and an ever-increasing urbanised metropolis these remnants of natural spaces and parks are much more than sanctuaries for our native wildlife and remnant flora -

they are places for individuals, families and groups to play, relax and to simply enjoy the wildlife and flora that exist in these spaces. These places have important cultural and social significance, and they need our protection. Climate change, greenhouse gas emissions and noise pollution further strengthen the argument that building more motorways is not the right direction to take.

Our aim is to give our natural spaces a voice, and to lobby State, Federal and Local governments to protect them for wildlife, for our community and for future generations, and to propose sustainable transport options rather than freeways.

Is the cost and destruction to endangered fauna and flora, hectares of parks, air quality and loss of many homes and businesses worth a one kilometre per hour speed increase (source KGR M5 eis pg 'v')?

16.3.5 Flooding

During construction, there is the potential for local catchment runoff to enter project excavations at the interchange locations and impact the construction ancillary facilities. Construction activities also have the potential to exacerbate flooding conditions in adjacent developments. The mitigation stated are physical barriers designed to protect the works areas and tunnel entries so as not to increase flooding conditions in adjacent areas. The public needs full independent advice on the safety of the tunnels which is not possible in the short period allowed for consultation.

16.3.6 Urban Salinity

I am concerned about the potential for salinity damage that can shorten the life of urban infrastructure such as roads, buildings, water and sewage pipes. This leads to costly maintenance and repair by homeowners and councils.

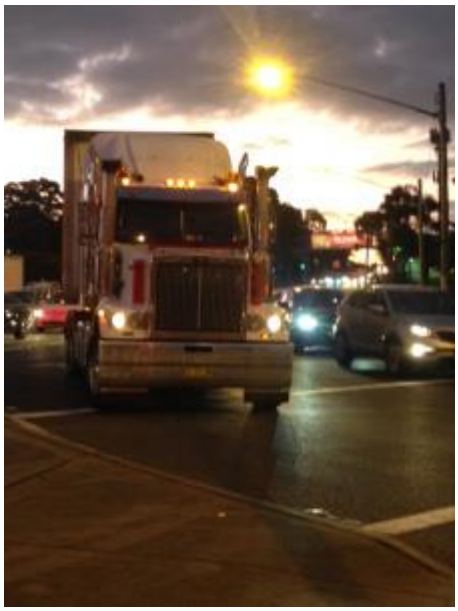
The movement of excess water and salt in parks and gardens can affect plant growth and cause plant death. Sports grounds and recreation areas affected by urban salinity may become bare, unattractive and unusable. Soil properties can be altered significantly making it hard to revegetate these areas.

Pockets of native vegetation in and around urban landscapes may also be affected. This can have serious consequences including the disappearance of native flora and fauna and poor downstream water quality.

I am concerned about the impact of groundwater and the potential for increased risk of flooding due to the reduction of greenspace.

The public needs access to more independent technical information so that they can understand the true impacts of the project.

I conclude that Westconnex comprehensively fails one of its claimed core objectives - *'Protect natural and cultural resources and enhance the environment'* is not met by the Westconnex project.



Residents studying the EIS while questioning the legality of early drilling in Haberfield

17 The project represents lost opportunity for better transport investment

As mentioned earlier, it is a tragedy for Sydney and NSW that the rational initiatives put forward by Ms Berejilian in the NSW Transport Master plan have been cast aside for this flawed project.

Alternatives that would have been regarded as long term assets as put forward by EcoTransit in their recent newspaper :

- Parramatta – focused light rail network.
- Modernise rail signaling to increase increase capacity
- East – West Translink – extending light rail network from Dulwich Hill through to the Airpor using unused rail space
- Kinsgrove "Last chance" Park & Ride
- Retrofit two extra stations at Airport Line
- Buyback the Airport line and reduce train fares to standard rates at the Airport stations and also removing the anti-competition clause
- Sydney-Newcastle rail line upgrade (stage 1)
- Parramatta Road Light Rail (CBD to Olympic Park)
- White Bay GreenLink
- Cycling storage at selected stations to complement a rail and ride concept
- More rail capacity and frequent services for the Western Sydney Rail Line

- Pippita Express Solution using spare rail space

The combined cost of all of these projects come in significantly less than $15 billion and would make a genuine dent in the problem of road congestion. These projects particularly would soak up much of the single passenger vehicles off the M5 and M5, clearing the road significantly for tradies and freight.

The science is clear – **Faster road network speed depends on faster public transport**. Take for example the recently built Gold Coast Tram. Patronage on the tram was delightfully beyond expectations. As a result, the performance of the parallel Gold Coast Hwy also significantly improved.

This is genuinely a tragedy to Sydney and NSW, particularly taking into account the WDA boast contained the King Georges Road M5 interchange (page v in volume 1) that "Sydney's network will improve by one kmph on completion of the entire project". Wow. Or more to the point, rather an underwhelming outcome.

I therefore reject the WestConnex project in its entirety, as it represents a tragic loss to the people of NSW in honestly addressing the congestion issues of Sydney.

18 The project fails justification that it is in the best interests for the public

I reject the WestConnex project in its entirety, as public health and wellbeing has been completely disregarded. This is a huge gamble on people's health, and the future funds to cover medical costs.

18.1 Health Impacts Summary

- This Human Health Risk Assessment is not accepted as a reliable study of the health risks of the WestConnex project
- This assessment has several serious flaws, but the key one is that it is not independent. It relies completely on the findings of the Air Quality Impact Assessment (Volume 2B, Appendix H), which in turn relies on the WRTM traffic forecast model. It does not question, in any way, the findings of the Air Quality Impact Assessment, thus does not assess the health risks of the very real potential for induced demand on Parramatta Road.
- Both NO2 and PM2.5 levels are already elevated and above guidelines in many of the localities within the project area, so any additional traffic due to induced demand (in tunnels or on surface roads) will add to this situation.

- This risk assessment does not point out that the air quality standards or guidelines used in the EIS may be superseded by stricter ones at the end of 2015 when the new National Environment Protection (Ambient Air Quality) Measure (NEPM) standards are passed
- A truly independent health risk assessment would have concluded that peoples' health was already being compromised in this corridor, and that further "hot spots" are going to be created by the project and that the relevant government authorities should be taking action about it, including by urgently implementing the National Clean Air Agreement.
- Other cleaner forms of transport are required in this corridor.
- Diesel fuel vehicles need to be phased out quickly, as is happening in France and proposed in other parts of Europe.

18.2 The Westconnex/AECOM Human Health Risk Assessment reaches the following overall conclusions

- The tunnel doesn't need filtration as there will be negligible pollution at the portals and the ventilation stack will disperse pollutants across the air-shed with negligible effect on local residents
- A detailed assessment of two key pollutants (nitrogen dioxide – NO2 – and particulate matter measured in microns – PM10, PM2.5) is required, given their known associated health effects and the impacts of their co-exposure (common in urban environments) and the known main source of PM2.5 (and finer) in the urban environment being vehicle diesel exhaust
- Potential health impacts associated with changes in air quality (specifically NO2 and PM) within the local community was assessed as low and essentially negligible
- There are some residents who will have an increased exposure to PM as a result of the redistribution of emissions from surface roads
- There are some residents who will be exposed to less PM2.5 as a result of the project
- Summary of mortality data for three key factors (COPD, lung cancer, cardiovascular disease) indicates that Sydney Area Health Service has rates higher than the average NSW rate for all three indicators; summary of hospitalisation data for key factors (asthma, cardiovascular disease, COPD) shows asthma rates similar to NSW and cardiovascular disease and COPD less than NSW rates (possibly accounted for by high GP service level in Inner Sydney)
- Increases in population (and its distribution) of the suburbs within the project footprint will have no impact on the health outcomes

- The time spent exposed to pollutants within the tunnel is very short (minutes) and in the absence of published guidelines for NO2 and PM within tunnels, advises keeping vehicle windows up and air con on recirculation setting
- Potential for noise and vibration impacts during construction could result in adverse health effects so management and mitigation plan required for health effects
- After construction, some properties will have elevated road noise so mitigation measures are required
- In such a complex project, there are inherent uncertainties in each of the methods used to estimate emissions and concentrations, and there are limits to how accurately any impacts in future years can be predicted

18.3 Summary of key air quality issues accepted by the Health Risk Assessment

- By 2021, without the project, the maximum (residential and commercial) 1-hour concentration of NO2 estimated to be (in micrograms per cubic metre) 375ug/m3 and 360ug/m3 (respectively) – which is well above the guideline (of 246ug/m3); with the project completion, the levels estimated as 307ug/m3 and 286ug/m3 (respectively) – still well above the guideline.
- By 2021, with the project, the cumulative (maximum annual average, rather than acute) NO2 concentrations estimated to be below the guideline of 62ug/m3
- By 2031, with the project, cumulative NO2 concentrations estimated below the guideline of 62 ug/m3
- By 2021, without the project, the maximum (residential and commercial) 24-hr average concentration of PM2.5 estimated to be 29.3 ug/m3 and 30.5ug/m3 (respectively) – which is significantly above the guideline (25ug/m3); with the project completion, the levels estimated as 28.2ug/m3 and 26.6ug/m3 (respectively) – still above the guideline
- By 2031,with the project, PM2.5 levels estimated as above the guideline
- By 2021, without the project, the maximum (residential and commercial) 24-hr average PM10 concentration estimated as 54ug/m3 and 55.4ug/m3 (respectively) – above the current guideline (50ug/m3) and well above the recommended (from the 2014/15 review) of 40-50ug/m3

- By 2021, with the project, the maximum (residential and commercial) 24-hr average PM10 concentration estimated as 52 ug/m3 and 50ug/m3 (respectively) – above both the current guideline and recommended (review) guideline
- By 2031, both without and with the project, PM10 will be above both guidelines
- Community locations most at risk by 2031 of mortality, cardiovascular and respiratory illness from increases in PM2.5 concentrations are: **Homebush Boys High School, Ella Community Child Care Centre.St Joan Of Arc Catholic School, Dobroyd Point Public School, Woodfield Aged Care Centre**

18.4 Methodology of the Health Risk Assessment

The Risk Assessment relies on key aspects of the Air Quality Impact Assessment including:

- The tunnel design claim that there will be negligible impact at sites of portals and ventilation stacks
- The findings of the air quality report within this EIS, which relies heavily on the air quality data from the 3 OEH monitoring stations at Rozelle, Chullora and Earlwood, one of which, Rozelle, does not monitor PM2.5
- Traffic estimates within this EIS (which in turn rely on the population estimates).

For the health indicators, it relies on:

- data that is five (5) years old for the key health indicators
- hospitalisation data only for respiratory indicators,and *has not included any GP data relating to consultations*.

It does not include the demolition of buildings (houses and commercial) in the risks associated with the project, even though a high proportion of pre-1980's buildings could have some asbestos on the sites.

18.5 Flaws in the Health Risk Assessment Methodology

- It accepts the claim that the tunnel design is "state of the art", and doesn't canvass options to filter using actual "state of the art" like the Hong Kong Wanchai By-Pass tunnel and Madrid (Spain) M30 Ring-Road.
- Residents at the Kingsgrove RSL (no) information session were advised by the Tunnel Ventilation representative that the Hong Kong tunnel is filtered due to the proximity of 25

story apartment buildings. This admission by WDA staff proves that Sydney is receiving a cheap 'ventilation' solution despite a similar situation to Hong Kong

  - Arncliffe has existing high rise and more planned
  - McCallums Primary (on a hill) is located very close upwind from the Kingsgrove business park poison stack located in a valley.

- It accepts a tunnel design that infers there will be no pollution at tunnel entry or exit ramps, with the speed into entrance ramps relying on the "piston effect" to pull vehicle emissions into the tunnel and into the ventilation stack. A close questioning of the "experts" (at a number of the WDA consultations) about tunnel exit ramps where they hit Parramatta Rd and West City Link, found they agreed that **there would be pollution in the vicinity of ramps if traffic hits congestion on exiting, and the same would be true for queuing traffic to enter tunnels. Thus their definition of "portals" is strictly that entry/exit area within the tunnel, not leading into or out-of the tunnels.** An independent risk assessment would have noted the possibility of build-up of pollution around these portal sites and the consequent health impacts. Kingsgrove, Bexley North, Arncliffe and St Peters have portals thus adding to the polution issue.
- An AMA submission into air quality states that the current air quality monitoring system in Australia does not adequately capture data relating to the exposure of vulnerable groups; and information on the levels that specific communities are exposed to, and the subsequent risk, is often unknown; the AMA believes the current monitoring system is only capturing data that represents exposure of the broader population, not people at "hot spots" – these "hot spots" would include the large number of residential and commercial properties within 300 metres of major roads (Australian Medical Association (March 2013), Submission to the Senate Standing Committee on Community Affairs, Inquiry into the impacts on health of air quality in Australia, p7). The Human Health Risk Assessment itself indicates there are 10,000 residences and commercial units (which includes multiple apartment blocks) within the affected zone. A conservative estimation of this population would be 40,000 people who may already be living in "hot spots".
- the data collected at the four (4) roadside air quality monitoring stations can be supplemented by similar data from the Lane Cove study (Cowie et al, 2012) collected at Parramatta Road Camperdown in 2006-2008, which indicated highly elevated levels of NO2 and PM2.5. The traffic count (2005) at the Camperdown (control) site in that study was 65,000 vehicles/day, which is a little fewer than the City-West Link count of 69,000 vehicles/day and higher than Parramatta Road (at Dalhousie St Haberfield) of 54,000 vehicles/day (NSW RMS Average

Daily Traffic 2012). All this data shows that levels are already higher than the guidelines, which themselves have been questioned by the AMA and several other groups in their submissions to the Senate Standing Committee On Community Affairs Inquiry Into The impacts On Health Of Air Quality In Australia.

- It should have noted that the new national air quality standards to be endorsed at the end of 2015, well before the project starts, may include higher standards for PM10 than are used in this EIS. The outcome could be many more "hot spots" than acknowledged in the Air Quality Impact Assessment.
- The study should have noted that several international studies have shown the adverse health effects of living less than 500 metres from major roads. In one longitudinal study of 2,300 children in Los Angeles, Guaderman et al found that improvements in the air quality (particularly PM2.5 and NO2) over several years had dramatically improved the lung function of children living less than 500 metres from major roads (Gauderman WJ, Urman R, Avol E, Berhane K, McConnell R, Rappaport E, Chang R, Lurmann F, Gilliland F.2015. Association of improved air quality with lung development in children. N Engl J Med. 372(10):905-913). A paper that calculates the medical costs of air pollution indicates that even the NEPM standards give a false sense of "safe" levels of pollution. This report states that as average levels of air pollution increase so do the average adverse health effects and that in fact there is no safe threshold. The paper claims that proper cost benefit analyses should be undertaken to accurately quantify adverse health effects due to both local and general increases in air pollution (Barnett, A, 2014 "It's safe to say there is no safe level of air pollution" Australian and New Zealand Journal of Public Health 2014 vol. 38 no. 5). The health risk assessment does not acknowledge any critique of what is considered a safe threshold because it completely accepts the assumptions of the Air Quality Impact Assessment. Available evidence doesn't indicate there is an exposure threshold for PM below which health effects do not occur; thus this risk assessment should have erred on the side of caution.
- The study should have noted the large number of people living, working and schooling less than 500 metres from the M5, King Georges Road and Stoney Creek Road are at an already elevated risk of health damage; it also should have noted the increased risk if this corridor does not have the reduced traffic volume estimated by the WRTM, given the additional sources from the tunnel traffic.
- A scenario including all risk factors for 2031 should have been discussed – that of increased traffic on the surface of Parramatta Road the full length of the project. The concept of 'induced traffic demand' is a real one and has not been taken into account by this health risk

assessment. A meta-analysis of induced demand (Cervero, R, 2001, Induced Demand: An Urban and Metropolitan Perspective, Paper prepared for Policy Forum, US Environmental Protection Agency) concluded that, whilst there were a range of elasticities associated with increased demand with new road infrastructure, the phenomenon should not be trivialised

- The study ignores the possible contribution of the project to the estimated health costs of the Sydney region. In 2005 in Sydney motor vehicle pollution alone accounted for $1.5b in health costs (Australian Bureau of Transport and Regional Economics, 2005, cited in Senate Standing Committee On Community Affairs Inquiry Into The impacts On Health Of Air Quality In Australia, NSW Environment Protection Authority Submission, September 2013, p15). As this report states … "particle pollution is the driver for the high public health costs of air pollution" (ibid).
- The mortality data for three key factors (COPD, lung cancer, cardiovascular disease) shows that Sydney Area Health Service has rates higher than the average NSW rate for all three indicators, yet this risk assessment does not question whether exposure to already elevated levels of NO2 and PM2.5 may be a cause of these elevated rates.
- The reliance on five years old data for the key health indicators is problematic, given background sources of key pollutants (NO2 and PM2.5 and PM10) have increased in that five year period, as evidenced by vehicle fleet data. According to the Sydney Morning Herald (March 15-16 2014) the number of diesel vehicles on the road in Australia has more than doubled since 2005. ABS data shows that in 2015 there are 3.6 million diesel powered vehicles, accounting for 19.7% of the fleet; and over the five year period from 2010, the number of Passenger vehicles and Light Commercial vehicles registered with diesel fuel increased by 96.4% and 62.9% respectively (ABS, Motor Vehicle Census, Australia, cat no 9309.0). This increase in diesel fuel use would have had both short term and longer term impacts on health in the period since this health data was published and has not been captured by it, nor has this health risk assessment mentioned increased risks from the growing diesel fleet. The other concern with growth of the diesel fleet relates to car manufacturers using software called "defeat devices" that allows the masking of exhaust emissions in pollution control tests. Recent revelations (eg SMH, Sep 23 2015) of such corruption by what was thought of as a "good corporate citizen" – the Volkswagen company – indicates the distinct possibility that other manufacturers may be doing the same. If the environmental protection laws are being flouted by many diesel fuel vehicle makers, then the claim by this EIS that tougher laws are making the Australian vehicle fleet (and therefore the air) cleaner is

questionable. The best option for any government keen to improve air quality in polluted parts of Sydney would be to quickly phase out diesel vehicles.

- Hospitalisation data for respiratory indicators should have been supplemented by GP survey data (given Medicare does not collect this level of data), collected by the relevant Local Health Districts.
- Sydney Area Health Service collects data on health risk factors, published for each Local Health District. The risk factor model is one that can be called a "personal behaviour" model. It includes risky alcohol drinking, smoking, consumption of fruit & vegetables, being overweight or obese, and adequate physical activity). It does not include external risk factors, like living within a few hundred metres of a busy road. The fact that the Area Health Services in NSW do not collect data for external risk factors, although they are known (e.g. exposure to coal dust (mainly PM10) and road pollution (notably NO2 and PM2.5) means that more meaningful data is not available to these types of Human Health Risk Assessments.
- The health impacts from noise and vibration seem to be underestimated by this health risk assessment. The writer should have conducted an independent analysis of that assessment, rather than relying on its findings. A independent review of the noise and vibration section of the EIS (which will be published by the People's EIS soon) raises uncertainty in a range of areas of the noise and vibration assessment. It states that, given the number of potentially impacted properties and people within the project area, further work needs to be done to ensure the local community and other affected stakeholders are provided with a fully informed assessment. This needs to 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 which does provide for any further input from the community.
- The health risk assessment should have included a risk assessment for asbestos and a management plan for mitigating risks, given serious community concern has been expressed over issues with asbestos removal and treatment at Granville (M4 widening stage) and at Alexandria (M5E stage).
- It is common practice in health research (including health risk assessments) to identify and analyse any related health studies to understand their the implications for the project being assessed-in this case the WestConnex project.Two such studies have been conducted on the Lane Cove Tunnel and on the M5East tunnel. The risk assessment ignored the 'fine print' findings of both of these studies. The Lane Cove study was of the short-term respiratory (asthma-like symptoms) health effects of exposure to emissions from the tunnel stack. The study was conducted 2006-2008, with thirty six (36) participants originally, falling to twenty

(20) by 2008. This is a very small cohort from which to draw any strong conclusions. The "control site" was Parramatta Road, Camperdown. The main conclusion was that residents near the eastern tunnel stack reported increased symptoms (even though there were no increases in pollutants) and this could be accounted for by other sources of pollution not measured in the study (e.g. particles smaller than PM2.5 and/or volatile compounds) or other unknown sources. The study also found significant adverse effects of increased airway inflammation, and chest and eye symptoms associated with exposure along Parramatta Road Camperdown after only 2-hour exposure periods. The authors recommended a follow-up study to better understand the effects of the ventilation stack. (Christine T Cowie et al, 2012, 'A randomised cross-over cohort study of exposure to emissions from a road tunnel ventilation stack', BMJ Open 2012;2). No further studies have been conducted.

- In the study of the pollution effects of the M5 East tunnel (NSW Health, 2012), it was stated that the ventilation stack was an important source of air pollution in the area within a 2 km radius, contributing 23% of NOx and 17% of PM10. The study's aim was to consider cancer incidence in the vicinity of the tunnel stack. Whilst it found there was a significantly higher incidence of lung cancer in postcodes immediately around the stack, the study concluded that it was unlikely there was a causal link. However, the study did qualify its overall conclusions with the comment that the descriptive epidemiological method used in the study was a relatively weak tool to resolve the type of issues under investigation. The study methodology was unable to discern the types of lung cancers screened in the area (smokers vs non-smokers). The study's argument was that, given lung cancers can take a number of years to become apparent, the higher incidence recorded after the opening of the tunnel may not have been connected to the stack emissions. The study concluded that the higher incidence of lung cancer probably pre-dated the locating of the stack in that area. This is an alarming finding, given that the cancer registry data would have been available to NSW Health, Department of Main Roads and the other bodies responsible for the EIS prior to the building of the M5East. So it would appear that an area of Sydney which already had an elevated incidence of lung cancer was chosen as the site of the M5East ventilation stack, when health research was already indicating the causal link between particulate matter and lung cancer. Given that mortality data for three key factors (COPD, lung cancer, cardiovascular disease) indicates that Sydney Area Health Service has rates higher than the average NSW rate for all three, is it possible that this project is again ignoring the potential health impacts of a project that independent experts predict will increase total traffic pollution over time.

18.6 Flaws in the assumptions on which EIS health findings are based

- The health risk assessment does not take into account the possibility of total higher traffic along our local roads . An Australian Government Department of Infrastructure and Transport Research (2012) report into traffic growth in Australia shows that traffic per person in Australia has grown steadily between 1965 and 2011. The measure of traffic volume (number of vehicles x distance travelled = vkt) in all states and major cities for this period indicates that the pattern of increases has been consistent, with only minor changes in response to petrol price rises, unemployment and the global financial crisis. Forecasts of future growth in traffic volumes indicate that traffic in Australia will rise from 55 billion vkt per quarter in 2011 to more than 65 billion vkt per quarter in 2020.

19 The project fails in applying an appropriate solution to a 21st century problem of congestion

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.

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:

(a) 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 (1)

(b) Serious human health impacts due to petrochemical vehicle emissions/smog, including:

i) Lung cancer,

ii) Asthma,

iii) Heart disease,

iv) Impaired lung development in children living near motorways/exhaust stacks.

(c) Waterways contaminated with road runoff (heavy metals and carcinogens in brake and clutch dust, exhaust particulates etc.).

(d) High traffic crash costs (of deaths/traumatic injuries and material damage).

(e) Urban sprawl and increasing commuting distances.

(f) Social isolation for non-drivers living in car-dependent suburbs.

(g) Noise pollution from traffic and its impacts on sleep.

(h) Impacts on visual amenity (pollution stacks, concrete interchanges, concrete flyovers).

(i) Extreme summer temperatures (urban heat island effect).

(j) Community destruction and severance.

(k) Destruction of heritage.

(l) Less incidental physical activity from walking and cycling (including to/from public transport), resulting in higher rates of obesity, diabetes, cancer and heart disease.

(m) Increased chauffeuring burdens for parents and carers.)

(n) Less independence for children.

(o) High per-capita greenhouse gas emissions.

20 The project contributes to carbon emissions

A shift from car-centric transport to one based on public transport, walking and cycling can reduce carbon dioxide emissions by 40%, according to a report by the Institute for Transportation and Development Policy and University of California.

"Transportation, driven by rapid growth in car use, has been the fastest growing source of CO2 in the world, said Michael Replogle, ITDP's managing director for policy and co-author of the report. "An affordable but largely overlooked way to cut that pollution is to give people clean options to use

public transportation, walking and cycling, expanding mobility options especially for the poor and curbing air pollution from traffic."

"The analysis shows that getting away from car-centric development will cut urban CO2 dramatically and also reduce costs, especially in rapidly expanding economies," said report co-author Lew Fulton, co-director of NextSTEPS Program at the Institute of Transportation Studies at UC Davis. "It is also critical to reduce the energy use and carbon emissions of all vehicles."

Given that climate change is real, and every county must endeavour to reduce emissions significantly, the WestConnex project is not best practice. I therefore reject this project in its entirety.

This 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 on Parramatta Road than predicted) of increasing these levels across the Corridor. Accordingly, I strongly object to the entire WestConnex project.

20.1 Strategies to manage climate change risks put off to "detailed planning" stage

The Climate Change Risk Assessment portion of the M5 EIS conjures an image of a durable roadway system withstanding the tests of a changing climate. While the document incorporates climate change into the risk profile of the project, it ultimately recommends very

little in the way of direct risk management strategies other than the "consideration" of various potential risks in the next phase of the design process and a few non-binding suggestions as to what these design adaptations might look like (see pages Chapter 25-9 & 25-10).

The calculation of a Greenhouse Gas saving is based on three basic deceits: 1) it conceals the predicted actual change in GHG emission (27% increase over 10 years); 2) there is a huge underestimation of the induced travel effect); and 3) the comparison with a do-minimum scenario is a false comparison.

1. **Actual 27% increase in emissions.** The modelling predicts an actual 27% increase in GHG emissions between 2021 and 2031 with the project (though there are no statistics to compare with current emissions). This is completely incompatible with Australia's commitment to reduce GHG emissions by 28% by 2030 or with the agreements reached at the Paris Conference to be carbon neutral by 2050. We need to be moving rapidly to reduce road travel which is inefficient. For example, road haulage emits three times more GHG than rail for the same tonnage. The presentation of the EIS, focussing on the purported saving compared to a do-minimum scenario is deeply dishonest in that it conceals the dramatic increase in emissions that will occur under this project, as well as under the do-minimum scenario.
2. **False comparison.** The EIS compares GhG emissions from traffic to a scenario without major road works. Considering that billions of dollars of public money is being spent on the project, the proper comparison should be with one where that money is invested in an alternative project that delivers a reduction in road use (and hence emissions). The predictions assume that road traffic will be about 107,000 journeys per day in each direction in 2021 and 130,000 by 2031. As an alternative, a bi-directional light or heavy rail line could reduce this by as much as 40%, providing a much larger reduction in GhG emissions.
3. **Induced travel.** There is a basic understanding in transport economics that if you add capacity on a congested road network, the number of vehicles using the network will increase until the congestion returns. While the EIS acknowledges such an "induced travel" effect, there is no explanation in the 258 page transport report about what assumptions were used. The report seems to have hugely underestimated the effect, as can be seen in some of the predicted traffic volumes. For example, it predicts if that all of Westconnex is built, traffic flows in the project area will be reduced by 10% and

on the Pacific Highway around the Cook River by 70% compared to the do-nothing scenario. This conclusion must be based on some childishly naive assumptions. In reality, users of these roads will adjust to any new ease of movement by increasing journeys. The main reason that the EIS predicts a reduction in GHG emissions is that there will be less congestion, based on these predictions of relatively low-flow. But, if the full effect of induced travel is taken into account, the level of congestion will be the same in 2031 as it is now, and there will be more vehicles affected. Thus, instead of a decrease of 2.9% compared to the do-nothing scenario, a 20-30% increase is more likely.

21 . National Trust Conclusions

The National Trust noted in their M4 East submission that this M4 East is only one section of the WestConnex Motorway and that **there will be additional heritage impacts relating to the St Peters Interchange and the future link between Haberfield and St Peters.**

The heritage impacts of the WestConnex Motorway are severe. The public must question whether the financial commitment for the total project in today's dollars of $16.8 billion (inevitably set to rise) would be much better allocated to public transport.

Back in the 1970's – workers refused to demolish 'those old buildings at the Rocks'. These historic buildings are an icon and asset to our Sydney. It is the same with the inner suburbs across the 33km. this is our history. It is gobsmacking that WestConnex project has been proposed with such a significant loss as a result.

I agree with The National Trust in their objection to the WestConnex M4 East proposal because of its severe impact on Listed Heritage Items and Heritage Conservation Areas and because it diverts 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.

21.1 Alexandra Canal – heritage importance

The Alexandra Canal is also at risk by the WestConnex project – yet another piece of our history likely to be destroyed.

Alexandra Canal is of high historic, aesthetic and technical/research significance. Historically, it is a rare example of 19th century navigational canal construction in Australia, being one of only two purpose built canals in the State, with one other known example in Victoria. It has the ability to demonstrate the NSW Governments initiative to create water transport as a means of developing an industrial complex in the Alexandria and Botany areas and exploiting the use of unemployed labour to achieve its scheme.

It played a seminal role in the changing pattern and evolution of the occupation and industrial uses of the local area and nearby suburbs, which included filling large areas of low lying land for development.

Aesthetically, intact original sections of the canal, comprising pitched dry packed ashlar sandstone, provides a textured and coloured finish which is aesthetically valuable in the cultural landscape. It is a major landmark and dramatic component of the industrial landscape of the area, particularly as viewed from the Ricketty Street Bridge and along Airport Drive.

Scientifically, the excavation of the canal provided a valuable contribution to the understanding of the changing sea-levels along the eastern seaboard and the antiquity of the aboriginal presence in the area. Intact original sections of the fascine dyke sandstone construction are rare examples of late 19th century coastal engineering works.

I object to the WestConnex project in its entirety, due to the destruction of our heritage for what is a wasteful project that fails to achieve any of its stated objectives.

22 People's stories

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.

22.1 Willows Nursing Home

According to the GHD EIS Social Impact report, at least five aged care facilities including hundreds of beds lie near the path of the M5 East.

Residents of aged care facilities or their families try to choose the best environment for their final home. High on their list of physical priorities are peace and quiet, a bright outlook and easy access for visitors.

Aged care facilities are both a home for residents and a business. While the EIS economic impact statement did not conduct any consultations with other businesses, 'social infrastructure' organisations such as churches, schools and health care facilities were asked for feedback and nearly all told Westconnex of their concerns.

The Willows Nursing Home was no exception. The GHD report records its many objections including noise, pollution and dust and anxiety about how visitors and staff would access the home both during construction and afterwards.

This is because if the M5 East was to proceed along the planned route, Willows Nursing Home would literally be in the middle of a construction zone and later next to the tunnel exit and unfiltered ventilation stack.

I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.

22.2 People's EIS interview with Sass Inbari.

Sass Inbari has owned Willows Private Nursing Home on Orpington Road, in Ashfield, since 1977. It was his father's before that and Sass built it up from 27 beds to 40. The home provides high care support to its elderly residents, and welcomes visitors from 8.00 am to 8.00 pm daily.

The Westconnex GHD social impact study notes that as a high care residential facility "the impacts of vibration and noise could be detrimental to health and wellbeing of residents."

Sass is concerned about the noise and dust occasioned by the demolition of the buildings immediately behind and next to the nursing home. Later there would be more disruption when this emptied space would be occupied as a construction site for the motorway and a parking lot for hundreds of large diesel trucks that will move in and out of the site each day.

The residents at the Nursing Home are frail and vulnerable. Staff are also upset and it will be a major inconvenience with road closures and works for relatives coming to visit, ambulances, delivery etc.

Bus stops on Parramatta Road are going to be moved, which means it will be harder for relatives to visit the residents.

Sass first heard about the Westconnex motorway on the news like everyone else, then about 3 or 4 months ago he got a visit from Westconnex representatives to discuss his concerns. "They took it all on board but I have not heard from them since," says Sass.

He wants compensation because of the impacts of the construction and of the operation of the motorway, and he is worried he is going to loose business.

He is angry too as he says he doesn't "know what good the Westconnex is going to do. All it will do is just shift the bottle neck towards the city."

He doesn't think people realise what impact the motorway will have.

All the other businesses around him, on Paramatta Road, have been purchased. Sass doesn't wish to be purchased, only compensated. He is stressed and frustrated as he feels there is nothing he can do to change the situation

I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.

22.3 This is the story of Kevin

22.4 Impact on Residents by Westconnex

WestConnex was required to include a social impact study in the EIS. This is Appendix M. The NSW Planning Department required that this section of the EIS should report on the impact of the M5 East on communities from planning through to operation of the WestConnex. GHD was hired to work alongside AECOM to produce the social impact study. According to its website, GHD is a global services company that operates in the "markets of water, energy and resources, environment, property and buildings, and transportation." It provides, "engineering, architecture, environmental and construction services to private and public sector clients." It is not a specialist in social impact studies.

People's EIS caught up with GHD consultant Anne Mithieux at a Strathfield EIS exhibition session in September. She explained to us that GHD did not interview any people whose houses were being acquired directly which probably explains why her impact study contained very little detail and described the stress and disruption that is already occurring along the M5 route as if it was a future event. She saw her task as recommending mitigation for the impacts of a project that was going to happen. (This is the sort of attitude that is fueling critics' apprehension that the Planning process is a set up.) She was not uncaring but is not very familiar with the area she was studying. She seemed a little surprised about the intensity of the impacts that were already happening.

Two weeks ago, the ABC interviewed Arthur Alibrandi who told the ABC News that his 82-year-old father, Joe who has lived in his unit for nearly 50 years, had been offered an amount by WestConnex that would make it "physically impossible" for his elderly father to stay in the area.

In response, Premier Baird told the ABC, "At times, there has to be a provision for the majority, there are difficulties for some people as part of that… We're doing everything we can in terms of compensation, looking after them, provide provision for a new home."

This statement reveals a similar detachment and apparent lack of knowledge on the part of the Premier. According to the SMH, Slater and Gordon Lawyers, who are representing about 70 property owners affected by WestConnex compulsory acquisitions have found that offers are 20-50 per cent below what clients' properties are worth. This means that residents quite unexpectedly are not only losing their homes but feel they have lost control over where they can live altogether.

I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.

22.5 Kevin : another story from Underwood Road

Kevin and Ann (not their real names) are both in their eighties. Five years ago, they moved to Homebush, a community along the M5 route that will be hit hard by the WestConnex.

Initially, Kevin wasn't bothered by the WestConnex because according to earlier plans, it would have bypassed his home. But in June this year, he was told WestConnex would compulsorily acquire his home and he and Ann must move out by April. As anyone who lives in Sydney would know, nine months is not nearly enough time to unexpectedly sell and find another home.

When Kevin and Ann moved into their home five years ago, they expected to stay there for the rest of their lives. They had specifically chosen the house because it had no stairs, was walking distance to the train station and shops, and in a quiet street.
When interviewed for the People's EIS this week, Kevin said,

"I am very unhappy about the WestConnex. I can't find anywhere to replace my house. I am very old, in my 80s, so I thought the place where we are living at the moment, is our home. But I can't find anything to replace the house that is near the station and the grocery shops. There were a few houses on the market, but they are too expensive. There is no way to get one of those houses, with the money I get from our house."

"They're going to acquisition it, they're going to buy it by force."

The situation is "very stressful. Particularly for aged people like me." He describes the search for a replacement as a "nightmare" that may have "shortened my life expectancy".

He laughed when asked if WestConnex had been helpful. "No. Just one way instructions."

"WestConnex is not helping to find a new house. It did a valuation and that's it. The amount from WestConnex may be fair, but I can't find anything to replace the house with the money from WestConnex."

I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.

96 year old resident Ray Harrison lives close to what could become a massive construction site for the tunnel exit and ventilation stack. He has been regularly protesting on the streets of Haberfield

22.6 WestConnex GHD report warns of serious risks to residents, especially vulnerable ones

The GHD report did find that the acquisition process could carry ‘significant social risks’ (Appendix M, p. 96)… including ‘inaccessibility of equivalent housing at a comparable

cost…relocation health risks…[and] altered access to social infrastructure' as well as potential housing stress due to higher rent or house costs. It is 'expected that the majority of owner-occupiers would aim to relocate within the local area', and effects may be compounded by the timeframe of just 9 months for some households to be relocated, market volatility and reduced housing stock available to relocate into (Appendix M, p. 68).

It also noted that the "stress and anxiety" could lead to "impacts on health, well-being and quality of life, which have been worsened by the uncertainty and the changing footprint of the project with some dwellings originally to be acquired now not, and some originally not impacted now required for the project (Appendix M, p. 68)."

It found that the impacts would likely impact vulnerable households but that even less vulnerable households would be affected as "land acquisition would increase property demand in the local area with some households with only nine months to identify alternate properties". (Actually it is less than nine months for Kevin as some property owners have been told they must be out of their houses by April next year.)

"Overall it is anticipated that the social impacts of relocating for many of the directly affected households would be **major short-term impacts**. In some cases, where households are unable to relocate locally, the social impact may involve an extended recovery time to re-establish social networks and daily routines for work, study and recreation. Alternatively, where households need to incur higher levels of debt in order to remain in the local area, increased mortgage or rental stress may result in greater and longer term social impacts."

Short term impacts are defined as between 1 and 3 years. (Appendix M p. 23). Major impacts are substantial ones that the report states could be mitigated, although it does not explain how this might happen after residents are forced out, which is in the process of happening at the moment. So for older people this could be very serious. The stress and forced relocation could shorten their lives, particularly for those who do not have strong family support networks.

Given the lack of any in depth or direct investigation by GHD, it is disturbing that the consultant repeats and appears to accept the word of WestConnex at face value. On page 87, GDA reports:

WDA is also providing an independent service to vulnerable households (e.g. elderly, those suffering an illness) to help assist with their relocation. This service aims to provide assistance with tasks such as finding a new property (either to rent or purchase), arranging removalists, disconnection of services (electricity, gas etc.), attending appointments with solicitors and other tasks associated with relocating. With nine per cent of people in the region over the age of 70 years and 4.6 per cent
needing assistance for their daily needs, this support will be imperative to mitigating relocation disruption.

On the basis of this statement, the report concludes that "minimising dislocation of affected households from their existing socio-economic networks is a key consideration in avoiding social risks to those affected by property acquisition."

22.7 GHD report out of touch with residents' experiences

While the WDA statement quoted in the GHD report does represent the official version of what is happening, it doesn't represent what residents would have told the consultant had they been asked. The problem is that with five months to go until they empty their homes and move to new houses, residents such as Kevin claim that support is simply not there.

WestConnex Action Group Haberfield spokesperson Sharon Laura told the People's EIS, "I hope those who are currently in the process of trying to negotiate just terms for the loss of their homes are not panicked into accepting what is first on offer by WestConnex/RMS." She recommended that residents negotiate hard like Aurelia to get the best deal – and not leave their current home until they have found a suitable replacement for the home and community they are losing.

"In Haberfield and Ashfield, there are owners and tenants, who have received their PANs (notice to settle on agreed price, either as an owner or tenant), and who are being hassled to leave their homes before Christmas. Many have no idea of where they will re-locate. Some, who may have been offered a 'good price', say that even with this, they cannot afford to purchase or rent back in Haberfield or Ashfield. So much for 'just compensation' and a just process of acquisition. Money provides no 'just compensation', when a person or family is forced out of their community against their will, and in an such and untimely manner. Why should anyone leave until they are ready and have got something decent to move into?"

The WestConnex Action Group rejected Baird's assurances that the government is doing all it can to support people and called for a halt to forced acquisitions.

Aurelia's 96 year old neighbour Richard reading EcoTransit Sydney newspaper

There are also serious impacts for residents living in aged care facilities and for tenants who may find it impossible to find or afford comparable accommodation in their home suburb

I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.

For many, working to own your own home is an important part of life in Sydney, although it is increasingly unlikely for younger residents due to rising house prices. People work hard to meet

expectations. The least they expect is that when it comes to the ownership of their home, they will be treated fairly.

The picture emerging if far from what Premier Mike Baird called "doing everything we can in terms of compensation, looking after them, provide provision for a new home" or the low key distanced tone of the Westconnex GHD Social Impact study

But you don't have to be old to be severely affected by the threat of losing your home for less than its value, especially when you call Westconnex's so called free counselling service and they don't ring back.

22.8 The is the story of Kim Sun who home at 21 Young Street will be smashed for Westconnex:

For the past few months, Kim Sun has spent almost every weekend attending auctions and open home inspections in and around North Strathfield. He is desperate and stressed as house prices are way above what he can afford.

The thing is, Kim and his wife already own a lovely home debt free in North Strathfield, which they have renovated bit by bit since buying it in 2006. They've added insulation, solar power and a water tank as they expected to stay in it a lot longer. Their six year old son rides his scooter with his dad to the local school and his grandmother lives a 5 minutes drive away in same suburb.

But in November 2013, Kim received a letter from the WestConnex Delivery Authority (WDA), informing him his house was to be acquired to make way for the motorway. It was the first he'd ever heard of the WestConnex. The family must now vacate by March next year, but Kim says WestConnex will only buy their house at nearly $200,000 less than market value.

"The price Roads and Maritime Services offer means we can only buy a home very substandard to the one we are living in. And time is running out. " says Kim.

"It's not right. It should be market value. That's what they say they are offering, and it's not. They are not doing the right thing by people. Considering the project is going to cost $15.4 billion, and they need our place, and they are stressing us out, why put on that extra pressure of offering below market value."

Kim Sun's has been forced to sell his house to RMS at below market value

“It’s a difficult situation too for me because my wife doesn’t work, she looks after my son and the house. I am the only one working, so it makes it a bit difficult having to borrow extra money to find a place, so we can stay within the area, with what they are offering.”

Kim says it’s the same for everybody on their street: “We all seem to have a problem with getting the market value.”

He knows others who have had to move to the Central Coast after their house was acquired, but that’s not an option of the Sun family. “I don’t want to change schools for my son, he likes it there, and mum is close by. I don’t want to go somewhere else,” says Kim, who catches a train from North Strathfield station or Strathfield station into work at Town Hall. “We were hoping to stay here a long time, which is why we set the house up comfortably.”

The past two years of negotiations and uncertainty have taken their toll. Kim is struggling with stress and is on antidepressants. It’s a situation made worse by a lack of communication from the WDA. “I’ve tried to call WestConnex myself, but they don’t return calls,” says Kim, who has kept a log of these calls, having been assigned a ‘job number’ for each. He feels “extremely disapointed and stressed” with the way WDA has treated his family.

In July this year Kim called WestConnex wanting to know by when exactly the house had to be emptied, and also asked about accessing the free councelling service on offer. His call was never returned.

A young family, work and an ailing mother already make for a busy life, and Kim says the last thing he needed on top of it all is to be "kicked out of my home in such a short space of time now".

Asked by the People's M4EIS what he thought of Premier Baird's comment about needing to make provision for the majority, Kim says: " If I was losing my house to public transport I'd probably feel less hurt by it. I don't think the WestConnex is going to solve our problems. For me public transport would be the way to go first. And I thought 'market value' was market value. I don't see why we have to negotiate so hard with them."

I object to the WestConnex Project in its entirety, as the treatment of residents is an unacceptable. It is un-Australian.

22.9 Snippets from 'American Way' interview with Jessie J (*The Voice*) about Sydney

Speaking of adventure, Jessie says her newest discovery is an area called Newtown — best described as being the Sydney version of what Brooklyn is to Manhattan. Located two train stops from the city and bordered by the sprawling campus of The University of Sydney, the neighborhood is a little alternative with a touch of hipster chic and vintage cool thrown in for good measure.

One of her recommendations is in the historic Rocks area abutting the harbor at the northern end of the Central Business District. "The fact that you've got the Sydney Harbour Bridge, the Opera House and some great bars and restaurants all in the same area makes it very unique. There's nowhere else in the world you could be in that moment."

If she had to name one place in the city that is a nonnegotiable, it lies just across the harbor under the northern pylon of the Bridge.

"Luna Park is an old-fashioned amusement fair that's lit up beautifully at night," she says. "I feel a bit bad talking about it because it's a place the locals adore and it's got beautiful heritage architecture with a view across the water that is just beautiful. There is also a great live-music venue there, which I've actually played, so do a bit of research beforehand and you can actually catch a gig while you're there."

Ask any Sydneysider how they feel about this icon, and they'll usually tell you it shines all the brighter the longer you look at it. Much like Jessie J herself

I object to WestConnex in its entirety, as it will destroy heritage areas that are of interest to tourists, not to mention, of national interest. You can't just destroy what is the essence of Sydney.

23 Where does democracy fit in?

Prime Minister Malcolm Turnbull has created a new ministry for cities and the built environment. Announcing his decision last month, he said:

"Liveable, vibrant cities are absolutely critical to our prosperity. (They are) where the bulk of our economic growth can be found … (and they are) economic assets. (M)aking sure that Australia is a wonderful place to live in, that our cities and indeed our regional centres are wonderful places to live, is an absolutely key priority of every level of government. Because the most valuable capital in the world today is not financial capital … (it's) human capital"

The inner west and inner south is a wonderful center which is mostly people for walking – nearly 90% of people are walking at any one time, 80% of people get there by public transport. A metropolitan strategy based on walkability and public transport is exciting.

WestConnex is out of kilter. It is hard to believe that the NSW Government would have really wanted this in their array of strategic plans (it certainly was not part of the NSW Transport Master Plan 2012). Obviously – it was dropped from above aka (worst ever) PM Tony Abbott.

We need to rethink how to plan to tackle Sydney's congestion issues. Fifteen billion dollars (plus) is a very sizeable amount of money – let's put it into that altenative future, because that's where the competitive future is for Sydney, and it will give us a much more liveable city.

Let's get serious about providing a better future for Sydney and throw wasteCONnex out.

I reject WestConnex in entirety, as it has not been through the proper planning strategy. If proper protocols had been followed, such a pathetic project would not have seen the light of day.

The People of NSW have been deceived and mislead by the proponents of the WestConnex motorway.

24 Conclusion

I consider it extraordinary that the WestConnex project has progressed to the point of issuing contracts and PAN notices to residents – without following the required dNSW and Federal public money u Sw Connex project has progressed this far. A project that has not followed due project procedures. A project that has been shrouded in secrecy and unable to provide evidence that it is the right project for Sydney.

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.

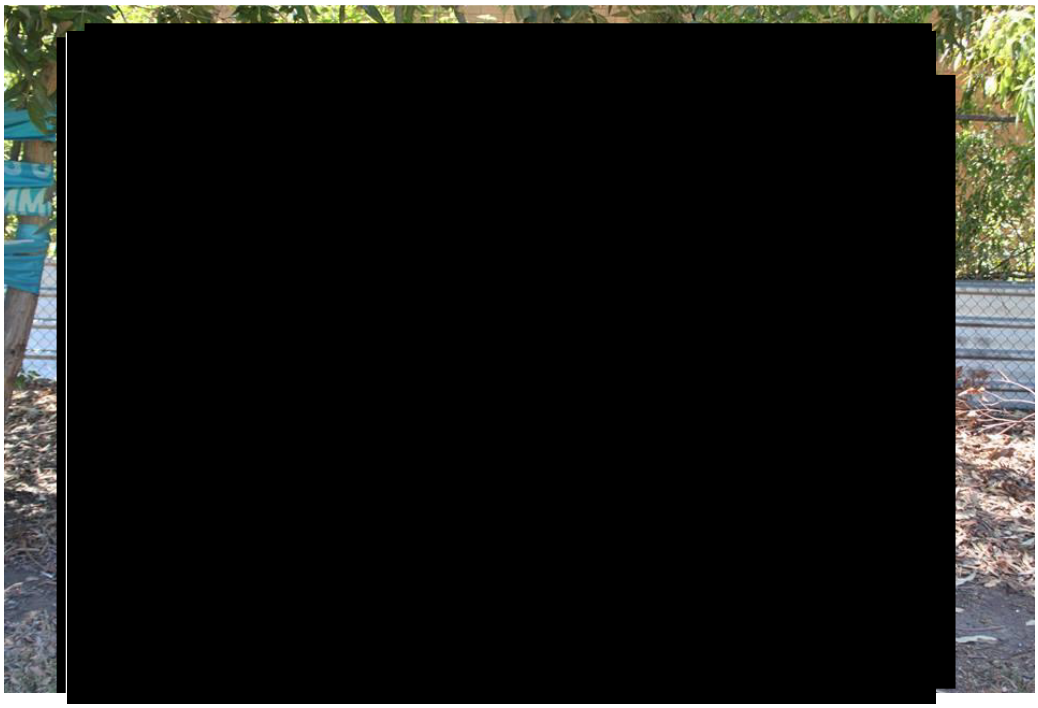
I further object to WestConnex community liaison staff **concealing information from residents.** The KGR M5 Interchange EIS stated that noise walls will be reinstated in their current form.

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.**

I understand that the Dept of Planning is under enormous pressure to approve the WestConnex project. Given the enormous community backlash and negative press to this motor-way. Given that WestConnex are really struggling with this project. The most sensible thing to do is to reject the WestConnex in its entirety and put the sad dog down.

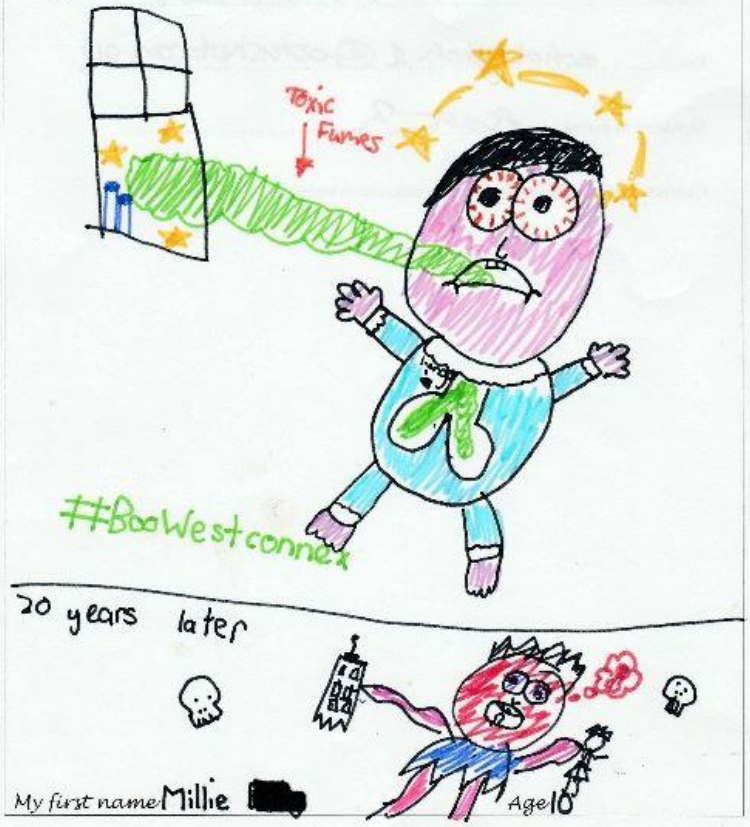
Then lets set about properly engaging the people, and getting Sydney moving with great public transport.

25 Children's voices from Kingsgrove.



Secretary
NSW Department of Planning and Environment
GPO Box 39, Sydney NSW 2001
Submission to DP & E Project Number: SSI-id_6788 WestConnex New M5

I object to the westconnex project because



20 years later

My first name Millie [redacted] Age 10

Mum or Dad to sign the back of this letter

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

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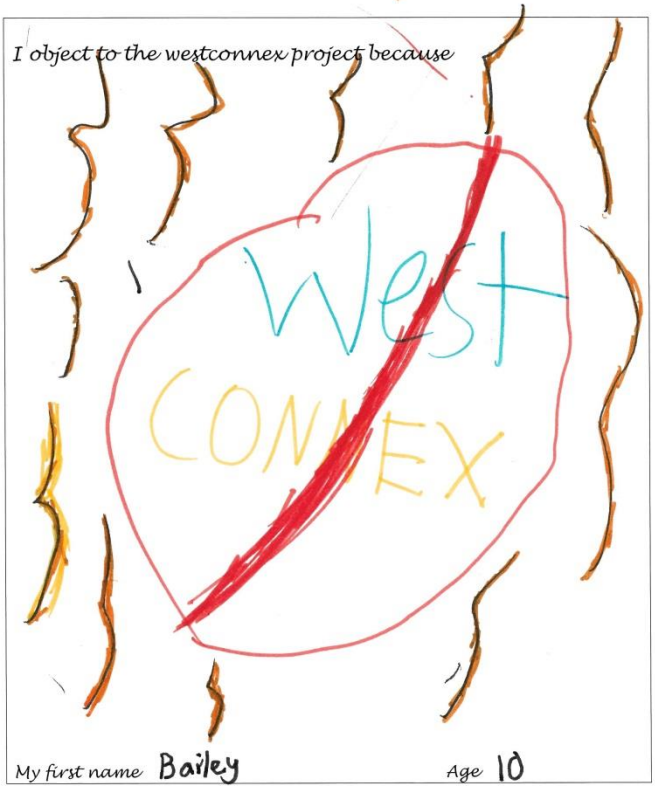

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Mum or Dad to sign the back of this letter

26 References

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[redacted]

Name: Bronte English
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Address:
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Beverly Hills, NSW
2209

Content:
I strongly object to WestConnex. It is not in the best interest for Sydney

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[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 write to express my strong objection to the WestConnex New M5 East motorway proposal as well as the entire WestConnex project in entirety.

The strategic justification for the New M5 is weak and inconsistent with the NSW Governments strategic planning and policy framework.

The 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 blown out to $16.8 Billion (and expected to increase significantly) which is not fully funded. WestConnex represents a significant opportunity cost. This level of investment could deliver other projects of significant economic and social value to the state which could benefit a greater number of people and businesses.

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 Sydney into a road project with inadequate assessment, and then for the proponent to find that it is a myriad of more and more expensive toll roads, and more and more road widening in a desperate effort to try and make it work. This is not how infrastructure planning should be conducted, and thus reasonable for the community to consider that this is road planning on the run.

The weaknesses of the proposal have been amplified through poor project governance.

I strongly urge the Department of Planning & Environment to not approve the New M5 East and the WestConnex project in its entirety as it is not in the best interests for Sydney.

It is concerning that over one million people will be directly impacted by the WestConnex project and the myriad of 'complementary' works.

It is concerning that the project is being released in sections, in an effort to avoid the scrutiny of the huge social , environment and financial risks that NSW is exposed.

I consider the inadequacy of the New M5 EIS is so profound that I do not consider that it can be used as the basis for a Ministerial determination to approve the project.

In short, I reject motorway investment of this scale, in this century, stating only rail infrastructure (light, heavy, freight) can keep this city liveable and functional if we wish to maintain a 'global' economic status based on population and investment growth.

The WestConnex project does not fit within the rationale of the NSW Master Transport Plan – for which it claims it is front and center despite retrofitted after the initial Plan release:

"Regular physical activity is important to our health and wellbeing. Recent research shows that many people get an additional eight to 10 minutes of exercise each day when they use public transport. Importantly, being active for part of our journey to work or school incorporates exercise into our daily routines. The NSW Centre for Population Health has observed that public transport use, walking and cycling are associated with a number of health benefits, including a reduced incidence of obesity, higher levels of exercise and improved mental health.

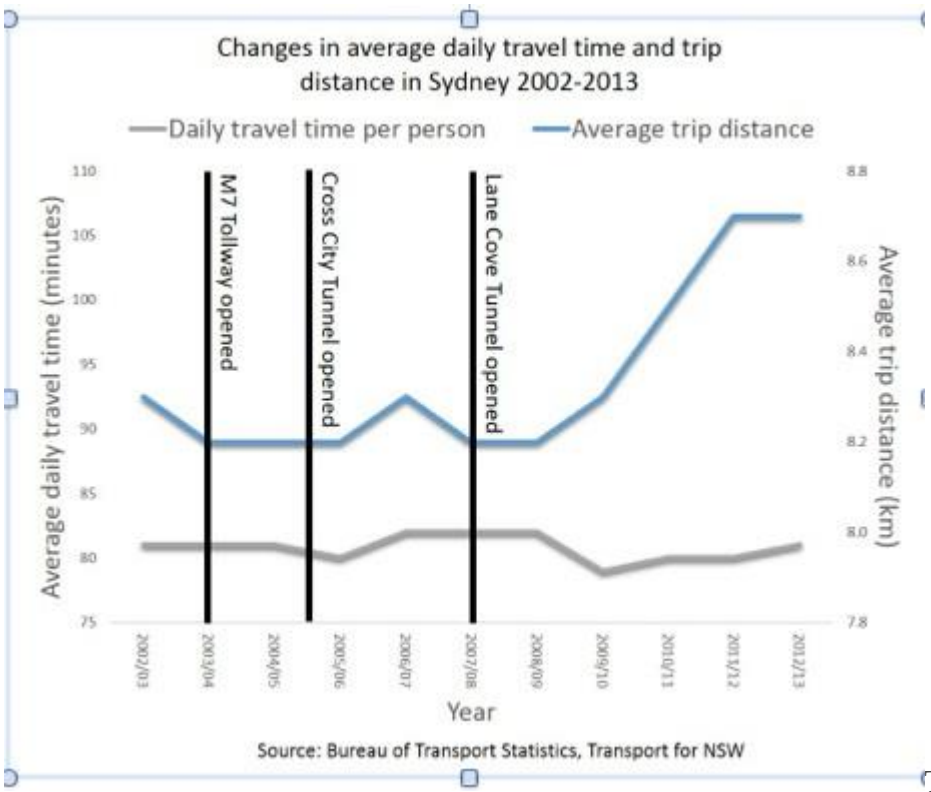
Building social and community goals into our transport planning will strengthen communities, reduce disadvantage and open up opportunities. To meet our objective of reducing social disadvantage, we will require new ways of thinking about how to distribute transport services more evenly across the State. We will need to give people healthier travel options, such as making it easier and safer to cycle to work or walk to the nearest train station. We will also need to integrate our transport system more closely with land use planning, creating well-designed cities and suburban centres that ***reduce our reliance on cars****, encourage us to be more active and produce safe, attractive and well-used urban spaces".*

1 Summary of objections based on subject area:

The very short time period has not been sufficient to address technical issues in this EIS. This is in itself a **corruption of the democratic process** to deny the public the opportunity to assess nearly 8000 page EIS during the Christmas holidays when school groups have not been granted the opportunity to respond. I request the EIS response time be extended to end March 2016.

1. The EIS does not comply with the Secretary Environmental Assessment Requirements (SEARS).
2. There are major issues with the Traffic and Transport Assessment. There is insufficient information about the modelling inputs, assumptions and methodology for the forecasts to be independently verified. There is no sensitivity analysis of key assumptions.

3. The social and environmental impacts described in the EIS are unacceptable and far outweigh any benefits of the project. **Because of flaws in the modelling, the actual impacts are likely to be even greater than those forecast.**
4. The project does not meet the project objectives.
5. Many of the project objectives, such as congestion relief, could be met through better management of demand on the existing road network, e.g., through reform of road pricing. The corridor already has an extensive and high capacity road network; there is just too much demand at present for it to operate effectively. Adding more capacity will not lessen this demand; it will only serve to increase it.
6. 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 can be effective in meeting the main project objective (reducing congestion), then what is the rationale for adding more capacity
7. The project makes little sense from a transport planning and policy perspective. The role of motorways is to allow traffic to circumvent densely populated areas. For radial transport into and out of urban centres, mass transit is more efficient and economical, and has less impact on the human population.
8. The project is not in the public interest. It will be used by less than 1% of the NSW population each day. The rest of the population will pay dearly in terms of higher traffic impacts, poorer air quality, and state and federal taxes being diverted from public transport and other more worthy causes?
9. 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).
10. 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 (see graph below). 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 higher speed of tollways has simply encouraged people to move further from work, drive more, and make longer trips than before, for example, visiting shopping malls instead of local shops. It has made road more attractive than rail for freight.

11. **This predict and provide approach to transport planning has been a failure, and is being abandoned by advanced nations. In a city of 5 million people, we can never provide enough road capacity to enable everyone to live as far from work as they like, and drive wherever and whenever they like in free flowing traffic.**

2 Failure of Project Governance

I object to the entire WestConnex project as it has failed to follow the correct and disciplined project governance requirements. Please respond to the below

2.1 Lack of Transparency and Proper Process in Project Selection

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' bypassing important evaluation steps aimed at providing assurance to government and the taxpayers that the project is the best solution.

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)

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)

"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)

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

Unfortunately, the WestConnex project **does not appear to be an example of industry best practice** in project selection and transparency (see NSW Auditor General's comments below). Calls for the release of the business case have been opposed by both the Federal and NSW governments. **If there is such a compelling business case, then why isn't it being shared with the Australian taxpayers who are bearing the risks associated with this project.**

The 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 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)

2.2 WestConnex Concept

"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)

2.3 Developing the business case

"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)

2.4 Gateway review of preliminary business case

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

(p.29)

Red: critical and urgent – project strategy to address the shortcomings/recommendations is to be established before project is further progressed.

Yellow: Important and urgent – project should go forward with action on recommendations. Source: WestConnex preliminary business case Gateway review 2013.

2.5 Matters a Gateway review may have identified

"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)

2.6 Purpose of the 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)

I reject the WestConnex project in its entirety as WDA have been unable to present any evidence of project viability.

2.7 Solution mode prior to analysis

The 'Captains Call' to build a road was decided without exploring other options from an expert analysis of Sydney's congestion problems. The intricate science of public transport was ignored, as well as decades of world experience that building motorways through an inner city does not solve congestion.

This project has had nothing to do with Infrastructure Australia's processes, nothing to do with a strategic approach to building transport, nothing about getting better economic productivity, let alone sustainability.

Tony Abbott and Nick Greiner have had a bizarre aversion to Public Transport, thus leading to this enormous Folly.

It is unacceptable that out- of-touch politicians and ex-politicians should jump into solution mode and decide to build the WestConnex motorway. Leaving RMS/WDA staff scrambling to find something (anything) to justify the project.

It is unacceptable that correct project procedures of understanding the core problem and identifying the best solution that meets the cost / benefit analysis was ignored.

It is unacceptable that the recommendations of Independent Infrastructure Experts were ignored.

It is unacceptable that a spend of $16.8 billion (plus) and 10 years of destruction and inconvenience for upwards one million people is justified with a Sydney road network improvement of just one kilometer per hour. (*source KGR M5 Vol 1 page v)

On this basis I reject the entire WestConnex project as not the solution to Sydney's congestion.

The failure to abide by the Major Projects Assurance Framework and employ best practice governance from project inception has greatly reduced community confidence. The Community is being asked to comment on an EIS that is deficient in analysis of project justification.

A condition of consent for the New M5 East should include adherence to the NSW Government's Major Projects Assurance Framework. Vital gateway reviews which 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.

Footnotes

1. Inquiry into Public Infrastructure, Productivity Commission (2014)
2. Submission to Select Committee into the Abbott Government's Budget Cuts, Marion Terrill, Transport Program Director, Grattan Institute (August 2015)

Abbott is now gone. Let's that the opportunity to conduct a Federal Audit of Westconnex, the ancillory works and complementary works. Then turn to investing our money, energy and expertise in Public Transport that will enliven Sydney, particularly the Western Suburbs.

2.8 Shutting down public scrutiny

As reported SMH 17 October 2015, the largest transport project in the country – WestConnex - is shielded from public scrutiny after the Government has transferred control to a "private corporation". The Sydney Motorway Corporation. There are no representatives of transport agencies on the Board. A Board comprised of Treasury officials, builders and financiers.

According to Labor's spokeswoman, Jodi McKay, it is "all about shutting down scrutiny". She has also commented that "I do not understand how they can call themselves a private corporation when they have two minister share-holders".

This era will be long remembered as a shameful corruption of the democratic process for NSW.

On this basis I reject the entire WestConnex project as it concerns me greatly the loss of transparency by transferring the delivery of the project to a 'private company'. This is not democracy.

2.9 AECOM and Conflict of Interest

Experts and academics have been critical of the AECOM traffic studies for this project, one complaining that there is insufficient information about assumptions behind the Westconnex Traffic Model for other researchers to test it independently.

This can only add to community unease about the EIS and planning process, especially because AECOM has not used the opportunity of the EIS report to respond to or engage with independent consultants as SCG Consulting that have questioned its traffic predictions for the WestConnex M4.ely on government departments to seriously evaluate the project and engage with critiques. Unfortunately, the Planning Department will publish the responses to the EIS on its website. Westconnex and

AECOM will then prepare a 'responses report'. Planners, health experts and others inside government say they will then be pressured to sign off on the EIS, although many know it is poor social policy.

The same firm is the subject of an ongoing legal action in Queensland – more than 650 investors are suing for $150 million, claiming the company's traffic predictions for a privately-owned toll-road in Brisbane were substantially inflated

Is it too much to hope that the Minister for Planning Rob Stokes and professional planners employed by the NSW government take time to seriously consider the substantial critiques of the project? From the public's point of view, it would be so much better to stop now rather than be stuck with another failed tollway project.

On the basis on questionable independence and integrity of the planning assessment process I reject the WestConnex project in its entirety.

2.10 Failed EIS Process

An EIS is supposed to honestly and fully discuss the costs and economic benefits as well as the social and environmental effects of a project as well as alternatives to it, but the EIS for the M4 East section, King Georges Road Interchange and the New M5 EIS is nothing more than a shoddy and evasive sales pitch.

I object because the whole process has been corrupted by the agencies who are its proponents. This is evidenced by, the awarding of contracts for the project, notice of compulsory acquisition of family homes and the planned destruction of local communities, all before the matter has been considered and approved.

These factors combined have left local residents feeling sad and angry about the process to date and left many feeling sceptical that there is any real concern about their rights and welfare. In addition no comprehensive business case has been presented and the arguments in the 8000 page EIS are simplistic and lack depth.

I object that the community was only granted 60 days to review the New M5 EIS. A minimum of 90 days should have been granted.

On this basis I reject the entire WestConnex project due to the failed EIS process.

2.11 Failure to engage in Community Participation & Discussion

It is unacceptable that the community and councils have not been engaged in meaningful dialogue and involvement in the future of Sydney and this project.

- The various so-called 'information sessions' have been a sham
- The information kiosks are not attended by informed staff

- The distributed material contains information meant to mislead.
- The distributed material is specifically designed to not advertise the project

WDA repeatedly quotes unsubstantiated 'benefits' across the entire project, yet downplays negative impacts to just the immediate section.

It is time that there is a meaningful discussion on transport infrastructure in this city. It is time to address demand management.

It is time in 2016 to ramp up the campaign to raise public awareness of a healthier and environmentally friendly commute to destinations. It is time that Urban Planning incorporates models of walkability when planning new suburbs. It is time that the public become very aware of the real cost of driving – both financially and the space that automobiles and roads take up. And, it is time to really penalise single passenger vehicles when public transport is available via (eg) via tolls and congestion tax.

It is time that our cities are returned to the people. Sixty years of priority has been given to automobiles and their domination of our landscape vs the livability of our suburbs.

I therefore reject the WestConnex project in entirety, as it has not been presented in a way that enables the public to determine if the proposal is an appropriate and effective solution for Sydney's significant transport problems.

2.12 Failure to disclose negative impacts in a timely and transparent fashion

WDA has been known to hide negative information that is essential for the community to form an opinion. Recent examples:

- Information kiosks at the shopping centers and information sessions:
    - Failure to incorporate the locations of unfiltered stacks in material
    - Failure to disclose the amount of greenspace and parks lost to the motorway
    - Failure to properly disclose the tolls & reintroduction of tolls on existing roads
    - Failure to disclose the number of people that will be displaced
    - Failure to disclose the number of businesses compulsory acquired and the jobs lost
    - Failure to disclose the method of calculation & definition of "up to 10000 new jobs" and failure to deduct the permanent jobs lost.
    - Failure to disclose that there is no appropriate monitoring of PM2.5 and less.
- Information distributed to Arncliffe residents failed to disclose the horrible impact on the endangered Green and Golden Bell Frogs.
- Confirmation that an unfiltered exhaust stack at Kingsgrove was planned. WDA staff member was very evasive to confirm that this was fact in June 2015.
- The eventual disclosure stating that this stack was located in an industrial area. No. It is a business park and located near nine schools and many homes and places of employment

2.13 Failure to incorporate Community Feedback from EIS

WDA have never incorporated community feedback in their designs, as evidenced by residents impacted by the KGR M5 Interchange at Beverly Hills. Even if data contained in the EIS was pointed out as incorrect.

- The response to residents was '*we will explain it differently, so you might understand*' our (flawed) vision.
- I object that all reasonable requests by Beverly Hills residents were denied on the grounds they were not reasonable or not feasible. The real answer is that the project is delivering the cheapest possible engineering design – at a permanent cost to residents.
- I object that the community and our local councils have been denied a voice.
- I object that residents have had to take extraordinary action to be 'heard'.
- Failure to address existing significant noise by refusing additional noise attenuation of transparent walls on the span the Cooloongatta Rd bridge replacing the wire. Rejected because it was too expensive (but happy to spend the money enhancing the motorists experience)

2.14 Failure to engage highly impacted residents during constructions.

There is a consistent effort by Westconnex Liason Staff in properly informing residents of construction impacts.

Residents of Elouera St Beverly Hills were not informed that heavy vehicles would be using their street. To add insult to injury, these trucks could idle in front of peoples homes. The longest was ONE HOUR. It is not good enough that multiple residents have to remind the construction company on a daily basis that idling trucks is a breach of conditions.

Failure to advise residents of Allambee Cresc South Beverly Hills that their park at the end of their street would be used as a construction zone. No letter drops. Just suddenly turned up one Friday morning and started tearing down the trees.

Thursday afternoon. Kids playing in the park at the end of Allambee Cres Beverly Hills

Friday afternoon. Park destroyed. And to add insult to injury, the workers did not turn down their high pitch reverse beepers. This was a condition of approval. Daily reminders to the Construction Company is not good enough!!

3 Project & Broader Westconnex scheme

1) The proposed New M5 and broader WestConnex scheme are not in the public interest.

1. Any personal travel time savings generated by the project will not benefit the economy, and will be cancelled out in time by induced demand and induced sprawl.
2. The New M5 will be used by less than one percent of the NSW population each day. The costs will be borne by the whole population.
3. 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.
4. There are numerous ways of spending $16.8 billion that would deliver a much greater social and economic benefit, and would not cause so much destruction.

2) The EIS authors (AECOM) have not modelled or objectively assessed alternative policy scenarios that could meet the transport/accessibility needs of NSW's growing population (individually or in combination), e.g.:

1. Greater investment in mass/public transport;
2. Demand management/road pricing reform
3. Land use planning that places homes, employment and services closer together

3) It is no secret that the primary 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 in the scheme as a means of paying for it (through tolls). However, there are various policy alternatives for dealing with the growing freight task that have not been objectively assessed in the EIS, e.g.:

1. Improve the capacity and reliability of rail freight.
2. Increase rail/intermodal freight subsidies to match those of road freight.
3. Divert container operations to other ports outside the city centre. It does not make sense to concentrate container operations in the city centre where road access is costly and has significant impacts on the surrounding residential areas. An expansion of the

Port Kembla container terminal, which already has good road/rail access, would stimulate the Illawarra region's economy.

4. Freight demand management, e.g., incentivise shorter supply chains and local supply.

4) The new intermodal terminals at Moorebank and St Marys, along with the planned upgrades to the Port Botany rail freight rail line, will significantly increase the share of freight that can leave/enter Port Botany by rail. Against this background, spending $16.8 billion on marginal improvements to road freight access must be questioned. Is the proponent (RMS) aware of the new intermodal terminals?

5) 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. In particular the assumed toll price, on which the traffic forecasts heavily depend, has not been stated.

6) 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. AECOM has a history of overestimating the willingness of motorists to pay for toll roads, resulting in overly-optimistic traffic forecasts and financial failures (e.g., Clem7).

7) There is **no modelling/objective assessment of the travel time and accessibility impacts for non-motorised modes (walk and bicycle)** in the Traffic and Transport Assessment

8) The issue of **induced demand** has not been adequately addressed in the Traffic and Transport Assessment.

9) Given the major flaws with the 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:

1. Air quality
2. Noise and vibration
3. Human health
4. Greenhouse Gases

10) The **role of motorways in a multimodal urban transport network is to allow traffic to circumvent populated urban areas, and to connect less densely populated areas** (where mass transit is not justified). For radial transport into and out of employment/activity centres, mass transit (e.g., rail) is faster, more efficient, requires less space, and has fewer impacts on highly populated urban areas.

11) **The EIS does not consider the cumulative costs and impacts 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:

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%.
2. Serious human health impacts due to petrochemical vehicle emissions/smog, including:
    1. Lung cancer,
    2. Asthma
    3. Heart disease,
    4. Impaired lung 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. Increasing numbers of people losing sleep due to traffic noise pollution.
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 areas/buildings.
12. Irreversible biodiversity loss.

13. Less incidental physical activity from walking and bicycling (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

4 WestConnex fails the objectives of the NSW Transport Master Plan

4.1 What came first – WestConnex or the Strategic Plans?

WestConnex is an anomaly to the NSW Transport Master Plan 2012

The WestConnex EIS claims that it was a legitimate part of the long term transport planning for NSW for which it is very obvious that it was retrofitted after the event.

The NSW Master Transport Plan December 2012 was written from the perspective of improving the mobility for residents and visitors to Sydney through the modernising and connectivity of Public Transport.

The focus mentioned frequently throughout the document was to reduce car dependency and thus congestion by investing further in the various modes public transport. The main initiatives were to address the lack of rail connectivity, by enhancing the current radial mode to be a more networked and connected system. It also included complementary improvements with other modes, such as increase dedicated bus lanes plus BRT, increased cycle-ways and encouraging walkability. The livability of communities and protection of the environment was a key outcome of the Plan.

"Most of Sydney's rail network was built more than 100 years ago and is primarily centred on servicing the CBD. There has been little recent expansion of the network, with 39 kilometres of the total CityRail system of 1,050 kilometres built in the past 33 years (as at 2012).. As Sydney has grown and evolved to a multi-centred city, its needs have changed and our rail system needs to evolve to keep up with these changes."

"Businesses often cite the lack of public transport connectivity as an inhibitor to establishing a presence in the three regional cities of Parramatta, Penrith and Liverpool, as well as precincts like Macquarie Park, Sydney Olympic Park and Port Botany".

"By enabling industries to set up in the regions, in transport terms, this would reduce the impacts of dispersed employment in Greater Sydney, alleviate car dependency and long commutes, and promote more liveable communities".

The below comments – lifted from the Master Plan – succinctly encapsulate the rationale of this Plan:

"Regular physical activity is important to our health and wellbeing. Recent research shows that many people get an additional eight to 10 minutes of exercise each day when they use public transport. Importantly, being active for part of our journey to work or school incorporates exercise into our daily routines. The NSW Centre for Population Health has observed that public transport use, walking and cycling are associated with a number of health benefits, including a reduced incidence of obesity, higher levels of exercise and improved mental health.

Building social and community goals into our transport planning will strengthen communities, reduce disadvantage and open up opportunities. To meet our objective of reducing social disadvantage, we will require new ways of thinking about how to distribute transport services more evenly across the State. We will need to give people healthier travel options, such as making it easier and safer to cycle to work or walk to the nearest train station. We will also need to integrate our transport system more closely with land use planning, creating well-designed cities and suburban centres that reduce our reliance on cars, encourage us to be more active and produce safe, attractive and well-used urban spaces".

The inclusion of the WestConnex project at various points throughout the document is an anomaly to the key rationale of the original document.

NSW Master Transport Plan Vision

"*The city will become more liveable by improving the design of buildings and public areas, developing mixed-use spaces where people work and live, and creating more opportunities for people to walk and cycle to work and major service centres. Protecting our natural environment, improving access to green spaces and improving air quality will be critical. The Metropolitan Strategy for Sydney underpins this land use and planning vision for Metropolitan Sydney to 2031.*

Central to these outcomes will be an integrated and efficient transport system that is closely aligned with land use planning. Sydney's transport infrastructure and services will cater to the customer, providing diverse transport options and reduced travel times, while being readily accessible across all parts of the city. Improved public transport networks will increase productivity and global competitiveness."

***"Improve sustainability** – by maintaining and optimising the use of the transport network, easing congestion, growing the proportion of travel by sustainable modes such as public transport, walking and cycling, and becoming more energy efficient"*

"For public transport - If Under a 'do nothing' scenario, most travel in Sydney would continue to be by motor vehicle, with roughly the same percentage of trips still made by car in 2031.

*"Transport has an important role in supporting Sydney as a global city. **Strong connectivity across the city, quality public transport networks and opportunities for walking and cycling can all contribute to maintaining Sydney's role as a centre of economic and social activity".***

"The city will become more liveable by improving the design of buildings and public areas, developing mixed-use spaces where people work and live, and creating more opportunities for people to walk and cycle to work and major service centres. Protecting our natural environment, improving access to green spaces and improving air quality will be critical.

*"Central to these outcomes will be an integrated and efficient transport system that is closely aligned with land use planning. Sydney's transport infrastructure and services will cater to the customer, providing diverse transport options and reduced travel times, while being readily accessible across all parts of the city. **Improved public transport networks will increase productivity and global competitiveness"***

The Master Plan also goes on with the rationale "Currently, ***around 14 percent of greenhouse gas (GHG)*** *emissions produced in NSW come from the* ***transport sector****, making it the State's* ***second highest source*** *of emissions. In the context of population growth and increasing travel demand, mitigating GHG emissions is a major challenge for the future".*

*"****Providing people with opportunities to use public transport instead of private vehicles*** *will help to reduce the environmental impact of transport in NSW. Increased walking and cycling, particularly for short, local trips, will also contribute to improved environmental outcomes."*

" *The cost and availability of oil and the rising cost of electricity will also have a direct influence on the choices we make in procuring the most environmentally sustainable and energy efficient technologies to power our transport fleets".*

"The growing travel task is also a challenge for preserving the amenity of many of our communities. The movement of freight is rarely silent and the generation of noise on a shared network in proximity to residential areas is a recognised issue".

The WestConnex project and its horrible impact on communities, vulnerable species and the environment is a complete juxtaposition to the vision for Sydney's mobility by Gladys Berejiklian (previous Minister for Transport)

Please explain HOW WestConnex fits into the above rationale

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 center 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 M5 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 centerpiece 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.

I strongly object to the WestConnex project, as it fails to match any of the required core outcomes of the NSW Travel Master Plan.

I strongly object to the WestConnex project as it represents a lost opportunity to "Get Sydney moving". The funds required to fully implement the exciting public transport projects that will significantly improve connectivity of rail; bus, cycle and walking opportunities as proposed by Ms Berejilian will not be available. Instead, funds are redirected to a road project that is a space hungry,

low volume mode of transport. It eschews Ms Berejiklian's rational plan for Sydney, instead resulting in the perpetuation of car dependency, more pollution, more traffic noise, more congestion, and more GHG emissions. It reduces the livability and amenity of our suburbs. It removes important greenspace and vegetation that is critical for the survival of vulnerable species and for the health and wellbeing of residents.

I point out that Inner-West Light Rail patronage has increased by 68% resulting in the need for 90 more services. How many cars has this infrastructure taken off the roads. The people voted. With their patronage.

I strongly object to the misrepresentation contained in the EIS that WestConnex was part of the NSW Transport Master Plan 2012. WestConnex was retrofitted in 2013, and was never a legitimate part of the long term plan scope.

5 The project fails to properly assess alternatives

To paraphrase a misattribution of Einstein ... the definition of insanity is to do the same thing over and over again, and expect a different result.

The SEARS provide for 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 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.

Finding: FAIL

Comment: The EIS does not include cost-benefit analysis, modelling, or any other objective analysis of feasible alternatives. Only cursory descriptions are provided.

No alternative staging strategies are described or objectively assessed.

6 Cumulative aspects and proposal's relationship to rest of Westconnex works

Details of the proposal's relationship to and consistency with the broader WestConnex, and an assessment of the cumulative impacts taking into consideration the WestConnex program of works.

Finding : FAIL

Comment: Cumulative construction impacts for the New M5 and other WestConnex projects have not been modelled/reported. Only a 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:
    1. Lung cancer,
    2. Asthma,
    3. Heart disease,
    4. 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.

7 Meeting objectives of the entire Westconnex

Finding : FAIL

Comment: finds that the project **FAILS** to meet the Westconnex objectives. This will be covered in Part 3 of this submission.

8 Impact of New M5 on traffic and transport after start of operation

Requirement: 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).

Finding : FAIL

Comment :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.

9 Induced traffic

Requirement: Induced traffic and operational implications for public transport (particularly with respect to strategic bus corridors and bus routes) and future public transport opportunities.

Finding : FAIL

Comment: 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 my 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.

10 Cyclists and Pedestrians

Requirement: Impacts on cyclists and pedestrian access and safety and consideration of opportunities to integrate cycleway and pedestrian elements with surrounding networks.

Finding : FAIL

Comment: 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 transport model (WRTM) nor the intersection models (LinSig). There is no forecast of the impacts on walking and bicycling travel times and accessibility.

11 Air Quality

Requirement: 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.

Finding: FAIL

Comment: 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.

12 Human Health Impacts

An assessment of human health impacts.

Finding : FAIL

Comment: 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.

13 Noise Impacts

Requirement: 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).

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.

13.1 Sydney has underinvested in public transport over the past 30 years

In 1998 the NSW government released Action for Transport 2010 an integrated transport plan for Sydney. The plan proposed to:

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

(Action for Transport 2010 an integrated transport plan for Sydney, 1998, NSW Government p.2)

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

(p. 3)

The plan listed (at page 5) 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**) and recently to Dulwich Hill

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)

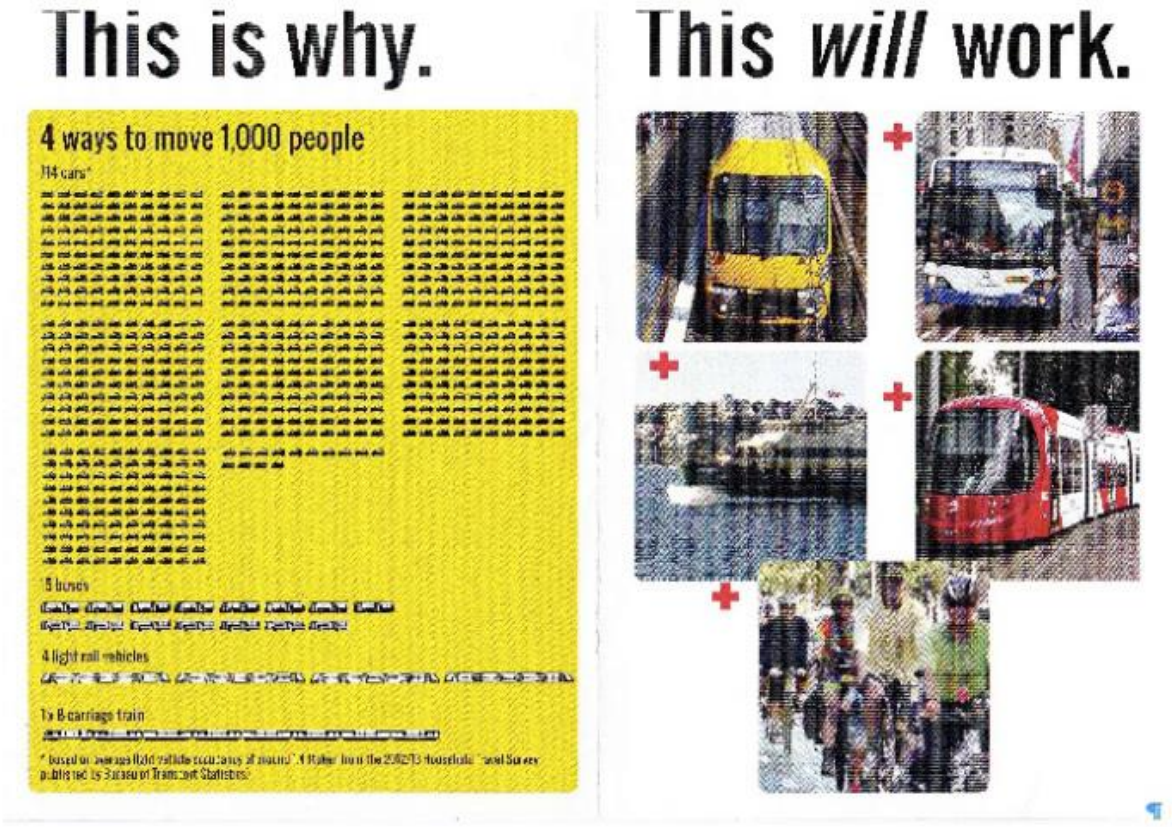
All the projects in bold were built. It can be seen from the list that every road project was delivered. Of the 16 public transport projects only four were completed.

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.

WestConnex clearly fails to:

- Reduce car dependency
- Meet the needs of our growing suburbs
- Get more people on public transport

The Benefit-Cost analysis of WestConnex is evaluated over a 40 year period. Relieving traffic congestion on the corridor appears to be a major objective of the project. The project reaches capacity in the M4 East tunnel within eight years after project completion. This does not seem to be an effective means of relieving congestion. The Cost-Benefit analysis should include costs of additional measures required over the **remaining 32 years of the project life** to maintain the claimed congestion and travel time savings. If included, it is likely that the **project costs will significantly outweigh any benefits.**



14 Failure to meet the stated project objectives

I <u>object</u> to the Westconnex project in its entirety as the core objectives are not met.

Westconnex has key objectives that the whole project is supposed to meet.

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.**

Westconnex's stated objectives have no associated targets by which their achievement can be ever be determined. For example, how can it ever be determined if the objective to "maintain regional air quality" has been met?

Objectives/targets need to be:

1. Specific

2. Measurable
3. Achievable
4. Relevant
5. Time-bound

Even though the objectives of Westconnex have been contrived to fit the project, the **project still does not meet them**.

Each objective below is accompanied by an explanation of why the project does **NOT** meet that objective. *(Ed: We counted them and there are 40)*

1. **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.**

- There is already an extensive and high–capacity 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 economical 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.

2. Relieve road congestion to improve the speed, reliability and safety of travel in the M5 Motorway corridor.

- 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 a new equilibrium between supply and demand is reached (i.e., congestion will return to its previous level)
- A better objective would be to give as many people as possible a reasonable alternative to sitting in traffic. How many people would really prefer to spend hours each week crawling along a dark tunnel inhaling truck fumes, than sitting in a modern train that takes them swiftly to their destination, where they can use the time to relax, read, work etc.
- 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 (4) than without it (3) in 2021.**

3. Cater for the diverse travel demands along these corridors that are best met by road infrastructure.

There is already more than sufficient capacity along these corridors to cater for all the essential vehicle travel. Non-essential vehicle travel could be discouraged through better demand management, e.g., road pricing reform.

4. Enhance the productivity of commercial and freight generating land uses strategically located near transport infrastructure.

- 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 them

be relocated to less populated areas, where the transport costs and externalities are lower?

5. Fit within the financial capacity of the State and Federal Governments, in partnership with the private sector.

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).

6. Optimise user pays contributions to support funding in an affordable and equitable way.

- 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.

7. Provide for integration with other WestConnex projects and the proposed Southern extension, while not significantly impacting on the surrounding environment in the interim period

- There will be significant impacts on the surrounding environment.
- 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.

8. Manage tunnel ventilation emissions to ensure local air quality meets NSW Environment Protection Authority (EPA) standards

- 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.

9. Maintain regional air quality

- 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.

10. Manage in-tunnel air quality to stringent air quality standards

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.

11. 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:
    1. Providing for energy-efficient transport modes (public transport, walking, bicycling).

    2. Land use planning that places homes closer to employment and other destinations.

12. 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.

13. Provide for improvement of social and visual amenity

- The project will reduce social and visual amenity.
    1. The concrete interchanges and pollution stacks will be visually obtrusive.
    2. The increased traffic volumes on surface roads will result in lower amenity (more noise pollution, more fear and intimation, increased crash risk etc.).

    3. 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.

14. Minimise impacts on natural systems including biodiversity

- The project will cause irreversible biodiversity loss.
- The project will contribute to climate change through increased greenhouse gas emissions. This will result in further biodiversity loss and damage to natural systems.

15. Protect surface and groundwater sources and water quality including management of contaminated areas

- The project will result in increased VKT (Vehicle Kilometres Travelled) , and therefore more contaminants (brake and clutch dust, hydrocarbon particulates etc.) being deposited on roadways and washed into waterways.

16. Reduce susceptibility to, and minimise impacts of, flooding

- 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.

17. 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

- The project is not a sustainable development.
    1. Not economically sustainable. The costs far outweigh the productivity benefits.

2. 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.

3. Not environmentally sustainable. It will result in higher greenhouse gas emissions and irreversible biodiversity loss.

14.1 Enhance the productivity of commercial and freight generating land uses strategically located near transport infrastructure

14.1.1 Failure to meet this objective

Freight benefits are an integral part of the justification for WestConnex, yet the New M5 does not go anywhere near Port Botany. It should be noted that when WestConnex was first reviewed by Infrastructure Australia it was classified as a freight project.

As detailed in the below section, with the majority of Sydney's the population located in the Greater West it makes better sense to transport the bulk of freight via rail, such as the utilisation of the planned new distribution center planned for St Mary's.

It is concerning that the Southern Gateway ancillory project will impact on the Southern Freight Rail Line requiring it to be moved by 500 meters. No details have been provided to the public as yet, but based on the outcome in Newcastle it is reasonable for the public to suspect the worst of impacts for a period of time to this freight line.

14.1.2 Freight by rail projects by private sector

According to a recent SMH article alternate investments are being made to move freight more efficiently and cheaply by rail from Port Botany.

A recent announcement by Asciano aims to have a second freight hub transporting containers by rail to Port Botany within 12 months, as it prepares to spend $100 million building a new intermodal terminal in western Sydney. This new 43-hectare hub, will be located in St Marys which is claimed as an ideal location for big retailers such as Woolworths, Coles and Bunnings, which have distribution centres nearby. It will be Asciano's second intermodal terminal in western Sydney after Chullora. The Chullora terminal started transporting containers on rail to the port two months ago.

The new hub's rail shuttle will have annual capacity of 300,000, 20-foot equivalent units (TEUs) annually. Chullora has annual capacity of 600,000 TEUs, including up to 135,000 TEUs that can run on rail to Port Botany. Chullora is running some 75,000 TEUs annually on rail to Port Botany.

At full capacity, moving freight from Port Botany by rail from Chullora could take up to 100,000 truck journeys off roads every year, according to Asciano chief executive John Mullen.

A much-bigger competing freight terminal will be opened at Moorebank by logistics group Qube and rival rail group Aurizon in late 2017.

The distribution centres at both Chullora and Moorebank are better suited for distributions in the inner west. Mr Mullen stated that with "most of the distribution centre activity is further north-west" then it makes sense to transport via a cheaper and more efficient rail mode.

The WestConnex project will perpetuate an inadequate, antiquated and highly congested transport route that will not meet the needs of the freight transport industry and the people of Sydney and NSW. The Freight Industry recognises this, and have embarked on their rail projects that will better support Sydney's global economic corridor. Why does this Government and the RMS not recognise 21st century solutions to our congestion problem?

: http://www.smh.com.au/business/asciano-spends-100m-on-expanding-sydney-freight-hub-network-20151008-gk44qp.html#ixzz3oFxu8ITj

14.1.3 NSW Government has failed in aim to increase freight by rail

The NSW government has failed in its aim of moving an increasing proportion of freight throughout Sydney on rail, leading to more heavy trucks on the road. This outcome, which Roads and Freight Minister Duncan Gay concedes is a "slight embarrassment", comes amid rapid growth in the volume of goods and commodities being moved through Sydney's container port at Botany.

The state Coalition government wants to lift the share of containers moved through the port from 14 per cent to 28 per cent by the start of the next decade. This is a downgrade from the former government's target of 40 per cent, which it never got close to meeting. But over the life of the O'Farrell and Baird governments, the rail share of containers has remained stuck at about 14 per cent. Asked about the failure to lift the share at budget estimates about the failure to lift the share, Mr Gay said: "We believe we will do it, but we are a long way off at the moment."

Mr Gay attributed the failure to move a larger share of goods by rail to improvements in truck access to the port, which started under a program set up by former ports minister Joe Tripodi.

"It is success in one area that has stopped progress in another," Mr Gay said.

The executive general manager of NSW Ports for planning and infrastructure at NSW Ports, Marika Calfas, attributes the number of trucks due to the lack of terminals to transport containers by rail, and to a lack of regulation. "We need the facilities out there to increase capacity," Ms Calfas said. "We need to be able to take the boxes somewhere."

14.1.4 Decades of underinvestment in freight rail

Tony Abbott - in his 2009 book *Battlelines*, the "humblest person is king in his own car". He went on to dismiss outright the practicality of public transport in Australia's sprawling cities: "Mostly, there just aren't enough people wanting to go from a particular place to a particular destination at a particular time to justify any vehicle larger than a car, and cars need roads."

Despite this assertion, the new Sydney motorways partly funded by the Road-focussed Abbott government are being built in the most densely settled parts of Sydney. The NorthConnex and WestConnex involve building very long tunnels. All are likely to ignore the safety recommendations from the coronial inquest by Judge Jennifer Coate into the three-truck pile-up inside Melbourne's

Burnley tunnel in 2007. Between them, the projects involve more than 23 kilometres of new tunnels. Coate urged governments to build tunnels with dedicated emergency lanes and to eliminate the need for lane-changing, but the NSW government has shown that such features won't be included.

The relentless rise of heavy vehicles in Australia's transport system over the past four decades has occurred in part because Australia has no proper charging system, and because governments have starved the publicly owned rail-freight system of investment. As a result, rail's share in moving the goods that Australians buy every day has steadily declined, while the volume of road freight has increased almost tenfold over the past 40 years, to 203 billion tonne kilometres.

This development is in marked contrast with the situation in the United States. The US still moves about 40% of its intercity freight via rail. The US rail system is one of the most efficient in the world, and it is also profitable. It's such a good business that the shrewd investor Warren Buffett recently sank $US26.5 billion into buying a rail company.

Australia's shift to the roads has locked us into a freight system that is inherently more costly, more carbon intensive and more dangerous. Figures published by the federal government's Bureau of Infrastructure, Transport and Regional Economics (BITRE) show that the cost of moving 1 tonne of freight by road over a distance of 1 kilometre (known as cost per tonne kilometre) is 7.5 cents for road, more than double the 3.5 cents for rail. The greenhouse-gas emissions for road are more than triple those for rail: 52 grams per tonne kilometre versus 15.

This road-dependent freight system also means that Australia's cost of living is much more exposed to oil price rises. The carbon-intensive nature of the system makes it vulnerable to any future moves to introduce international trading systems or other regulations for greenhouse emissions.

There's also road dependency's cost to human life. In the five years to 2011, the average number of fatalities from Australian road accidents that involved a truck of more than 4.5 tonnes was 239 a year. The comparable number for rail, including passenger trains, was 34 deaths a year, which is remarkably low given that rail moves greater tonnage than road when bulk commodities such as minerals and grain are included. This means that trucks cause around 20% of all road fatalities in Australia even though they make up only 2.5% of the vehicles on the road. The number of people injured in such accidents continues to rise. In 2008–09, the latest year for which injury data is available, 1536 people were hospitalised after accidents with trucks. Accident victims classified as suffering a "high threat to life" totalled 551 in 2008–09, an increase of 18% in eight years, according to a 2014 BITRE report.

BITRE predicts a further 50% rise in the number of trucks on our roads over the next 15 years. Despite the urgent need for policy action, the wheels of government are moving slowly.

Two key reforms would give Australia a less costly, less dangerous and more climate-friendly freight system, and they are related. The first is distance-based charging for heavy vehicles, and the second is the construction of an inland rail line between Melbourne and Brisbane, which would avoid Sydney's notorious congestion and the 19th-century coastal rail line.

Trucking has become so dominant that even the trucking companies are saying that it's in their interest to shift more freight onto rail. Fox and his company executives declined to answer a series of questions put to them, and Abbott would not comment on his relationship with Fox. But back in 2009, Fox broke ranks with the industry, and the Abbott view, and said Australia had to shift back to rail if it were to have a viable freight system.

"I'm talking against myself when I'm talking about putting things on rail," Fox told a forum at the National Press Club. Fox backed the inland rail line, but he also advocated making greater use of coastal shipping, transferring more of Sydney's trade activity to Newcastle or Wollongong, and shifting Melbourne's major port to Hastings on the Mornington Peninsula. In the early '70s, about one-third of the freight moved between Victoria and Queensland went by sea, but that has now fallen to nil. He said Australia could learn a great deal from China, which has built deep-water ports away from major cities. "We do need to move away from running transport operations in the centre of the city, particularly on the east coast of Australia."

Fox expressed what might be the vain hope that he would see **sensible reform** happen in his lifetime: "We're only here for a short time. I've got probably less than ten years to go. I'd certainly like to see some of these things that are in the **interests of the nation."**

Without the NSW Government investing in the right infrastructure , ie to invest in a more efficient movement of freight around our state and country – instead of the antiquated and polluting motorways, our country will continue to decline in profitability.

http://www.smh.com.au/nsw/more-trucks-on-sydney-roads-as-government-fails-to-hit-rail-share-targets-20140921-10jyab.html#ixzz3pDnELmvV

https://www.themonthly.com.au/issue/2014/december/1417352400/paul-cleary/roads-nowhere

14.2 Fit within the financial capacity of the State and Federal Governments, in partnership with the private sector

14.2.1 Failure to meet this objective

The WestConnex motorway is the wrong transport project for Sydney's future, a report commissioned by City of Sydney Council says.

The report argues the WestConnex motorway is unlikely to reduce traffic on local roads, exposes the taxpayer to huge financial risk, and will not benefit many western Sydney commuters. Journey-to-work figures analysed by SGS show only about four per cent of workers in suburbs such as Penrith, St Marys and Camden travel to the CBD. Moreover, about 90 per cent of these work trips to the CBD from the west are using public transport.

SGS's report also says “WestConnex shares characteristics with other motorways that have financially failed, such as the Lane Cove Tunnel, Cross City Tunnel and Clem 7 in Brisbane, exposing the taxpayer to risk”.

Principal of SGS Terry Rawnsley said a metro rail line along Parramatta Road between Westmead and Central would be a better fit for the city than a new motorway.

"It's the biggest transport project in Sydney's history and you want to be sure it is going to be an economically viable project. There's a lot of questions that someone needs to answer."
http://www.smh.com.au/nsw/nsw-state-election-2015/westconnex-the-wrong-project-for-sydney-report-says--invest-in-public-transport-instead-20150223-13m8f0.html#ixzz3ooycRRlG

I consider 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

It is reasonable for the Public to be very concerned about the financial viability of this project. Already the cost has blown out from $10 Billion to $16.8 Billion. It is apparent that the NSW Government is continuing to throw more and more money at the project, as traffic modelling continue to reveal that the project will not address Sydney’s congestion issues.

I reject the entire WestConnex project on the basis that the expected cost benefit ratio is less than the dollar and thus a waste of our NSW taxes.

15 Traffic Assessment

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 (area that is analysed) 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 (signals to regulate flow onto the ramps) 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.

16 Comments on specific sections

(The references here are to sections in Appendix G)

a) Appendix G, Section 3 Strategic Context 4.2.1

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); asingle 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.

b) Appendix G, Assessment methodology, 4.2.2

- 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. What toll prices have been assumed?
- The study 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.
- **Insufficient detail on the Value of Travel Time Saving (VTTS)/Willingness to Pay (WTP) model:**
    1. What are the form and parameters of the model?
    2. If it was based on stated preference surveys, then how has the issue of hypothetical bias been addressed?

3. Has the model been validated? Previous toll choice models in Australia have overestimated WTP for toll roads.
4. Does the model include the negative utility of the tunnel environment (monotony, no natural light, poor air quality)?
5. What value of WTP has been used in the WRTM?
6. What is the confidence interval around the WTP value used?
7. 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.

- **Why has the weekend period not been modelled, when current weekend traffic volumes are higher than weekday traffic volumes in some places?**
- **Insufficient information about the travel zone structure in the Westconnex Road Traffic Model (WRTM)**
    1. What are the travel zones based on? How big are they?
    2. How are intra-zonal trips modelled?
    3. How are trips to/from external zones modelled?

- **Induced demand has not been adequately addressed.**
    1. 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/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 my 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.

- **Insufficient detail on origin-destination demand matrix generation:**
    1. What are the form and parameters of the generalised cost function?
    2. How were shortest paths calculated?ion:
- **Insufficient detail on trip generation:**
    1. What are the form and parameters of the trip production function, and how was it estimated?
    2. What are the form and parameters of the trip attraction function, and how was it estimated?
    3. How were trip productions and trip attractions balanced?
- **Insufficient detail on trip distribution/modal split:**
    1. What are the form and parameters of the gravity model used?
    2. What are the form and parameters of the deterrence function used?
    3. How has modal split been estimated?
- **Insufficient detail on road traffic assignment:**
    1. Is assignment stochastic or deterministic?
    2. What link loading/flow function was used? What parameters were chosen?
    3. Were intersection delays included?

- **Insufficient detail on public transport assignment:**
    1. How were access and egress points determined?
    2. How were route strategies determined?

- **Non-motorised trips (pedestrians, cyclists) were not included in the WRTM or LinSig modelling. (**LinSig is a traffic modelling package for the assessment and design of traffic signal intersections, either individually or as a network that comprises of a number of intersections.**)**
- **Impacts on accessibility have not been modelled/assessed.**
    1. Most transport is not an end in itself – it is a means to access work, education, services etc. How does the project affect accessibility?

- **Equity and equality impacts not described.**
    1. How many people have better accessibility with the project?
    2. How many people have poorer accessibility with the project?
    3. Do benefits/impacts accrue to any population groups more than others, e.g., people with a disability or on low incomes?

- **Downs-Thomson Paradox is not considered (*Ed: According to the Downs-Thomson paradox, improved road capacity increases travel times because it attracts more users to the road and away from public transport.)***
    1. The project will attract passengers away from public transport to driving. 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.

- **No sensitivity analysis. (*Ed: The parameter values and assumptions of any model are subject to change and error. Sensitivity analysis , broadly defined, is the investigation of these potential changes and errors and their impacts on conclusions to be drawn from the model.)***
    1. 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?

c) Section 7 Assessment of construction impacts 4.2.3

- **Impacts on travel times for all modes (driving, public transport, walk and bicycle) have not been assessed/reported. The construction activities (*Ed: in some cases over three years*) will delay travellers in a number of ways:**
    1. Additional construction/workforce traffic.
    2. Temporary road and lane closures.
    3. Speed limit reductions.
    4. The 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. (*Ed: The M4 East construction period coincides would coincide with the New M5 project if approved)***

d) Section 8 Future conditions without the project

- **Has the impact that the forecast decreases in LoS will have on travel demand been fed back into the demand model? The decreases in LoS will reduce travel demand by influencing a number of long and short term travel choices:**

1. Home location choice;
2. Work location choice;
3. Destination choice;
4. Mode choice;
5. Departure time choice; and
6. Route choice.

As such, it is unlikely that the future 'do minimum' scenarios will be as bad as claimed. We know that congestion is self-limiting – as LoS declines, travellers will adjust their travel behaviour/choices to avoid congestion.

- **Tables 69, 70, 74, 75, 77 and 78 do not include the base year (2012) values, so the future 'do minimum' scenarios cannot be compared with current conditions.**

Table 79 WRTM screenline comparison between 2021 'without project' and 'with project' AWT volumes

Direction	Location	2021 'without project'	Share	2021 'with project'	Share	Change
Western Screenline						
Eastbound	Canterbury Road	23,643	22%	25,688	24%	9%
	M5 East Corridor (including M5 East Motorway and New M5)	57,764	54%	50,104	47%	-13%
	Stoney Creek Road	13,549	13%	19,230	18%	42%
	Forest Road / Queens Road	12,218	11%	12,108	11%	-1%
	Total	**107,174**		**107,129**		**0%**
Westbound	Canterbury Road	24,206	22%	25,895	24%	7%
	M5 East Corridor (including M5 East Motorway and New M5)	58,125	52%	48,424	45%	-17%
	Stoney Creek Road	13,496	12%	17,068	16%	26%
	Forest Road / Queens Road	16,513	15%	16,692	15%	1%
	Total	**112,340**		**108,079**		**-4%**

Ed: Where is the baeline? What are current conditions? Note also the shift in traffic to Stoney Creek Road that is already congested

- **Tables 72, 73 and 76 use 2014 as the base year, instead of 2012 as used elsewhere in the EIS. To understand the impacts of the project, a consistent baseline must to be used.**
- **An assessment of the impacts on walking and bicycle demand and travel times has not been provided.**

e) Section 9 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.

f) Section 10 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,

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/reported. Only performance measures for the immediate area around the St. Peters Interchange have been reported. Without this information, the
- An assessment of the impacts on walking and bicycle demand and travel times has not been provided.

References

1. Newman P, Kenworthy J. Costs of automobile dependence: global survey of cities. *Transp. Res. Rec. J. Transp. Res. Board* 1999;1670(1):17-26. doi:10.3141/1670-04.

16.1 Optimise user-pays contributions to support funding in a way that is affordable and equitable

16.1.1 Failure to meet this objective

WestConnex perpetuates car dependency.

I certainly do not have an issue with tolls or congestion taxes – but you must have a decent integrated public transport solution available first. Initiatives contained in the NSW Transport Master Plan (ignoring the retrofitted and contradictory westconnex) and Eco Transit Sydney would have enlivened the ability for people to get from A to B without via Central. Recent examples of the popularity of public transport – Gold Coast Tram. Green Square & Mascot stations once fares were reduced to standard and inner west light rail

WestConnex means that families in the West will need to find $100 - $200 per week to travel to work. Yet I – with public transport & Opal – pays $33.60 per week giving me free travel 3 days per week.

This is inequitable. Greater Sydney will continue to be in congestion – but now have to pay.

The New M5 means that our local roads will be awash with additional induced traffic, that are avoiding the tolls.

On this basis, I reject the entire WestConnex project in its entirety as it does not meet the objective of fair and reasonable access to transport for Greater Sydney.

16.2 Integrate with the preceding and proposed future stages of Westconnex, without creating significant impacts on the surrounding environment or duplicating any potential issues across the construction periods

16.2.1 Failure to meet this objective

There are large sections in our community that will endure up to 10 years of construction (destruction) in their community with 24/7 activity.

The EIS provides no mitigation or solution (apart from counselling).

10 years is a significant impact on a highly populated sections of the populace and should have been given greater weight for reasons not to proceed with WestConnex.

The myriad of road works – The Southern Gateway, Southern Extension, and complementary road works means our communities will endure long term construction for no benefits.

The lack of any evidence contained in the EIS on how this objective can be met, but anecdotal evidence proving otherwise, I therefore reject the WestConnex project in its entirety. This is a highly destructive and intrusive project for over one million people. That is not a 'few cracked eggs'

16.3 Protect natural and cultural resources and enhance the environment.

16.3.1 The WestConnex project does not meet this core objective

Features of the M5 East project include: Widening roads; unfiltered exhaust stacks close to homes, schools and aged care centres; destruction of trees; temporary and permanent loss of greenspace; induced traffic onto local roads; impact on wetlands, groundwater and endangered species; exposing residents to prolonged high impact acute noise 24/7; hundreds of significant truck movements a day impacting on the safety of residents particularly primary school children; isolation; community dislocation; car dependence.

None of these factors enhance the environment. In fact, this proposal has a very significant negative impact on the urban and natural environment where over a million people.

16.3.2 Sectional planning approach

I **object** to the sectional planning project approach to the 33 kilometre Westconnex motorway. This prevents serious consideration of the impacts of the larger Westconnex project. **While broad justifications for the whole project are used to justify local threats, there has been no overall analysis and evaluation of the environment threats from the whole project.**

16.3.3 Social Impacts

- Hundreds of homes 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.
- There is growing scientific evidence that excessive noise can damage short and long term health
- Road pollution is a significant contributor to overall pollution; living or working close to congested roads is a health risk; some roads that would be negatively affected by the Westconnex New M5 are already polluted.
- There is strong scientific evidence that air pollution, especially PM 2.5 and PM 10 are linked to increased risks lung disease, impaired lung development, strokes, cancer and other forms of respiratory illness.
- The EIS acknowledges that Stoney Creek Road, King Georges Road, Campbell Street Euston Road Alexandria and other roads will become more polluted. In some cases, air pollution is already at unhealthy level.
- Instead of tackling the issue of Sydney's pollution, the Baird government is planning tollway after tollway for Sydney. This will leave many people, especially those in Western Sydney, in a car dependent situation. This is unhealthy.
- Leightons/CIMIC, who have been awarded the contract before approval, decided that ventilation stacks should not be filtered although tollway projects in other countries have ventilation stacks which filter emissions. The EIS asserts that there will be very low ' negligible' emissions in local areas from the stacks. One reason engineers give for filtering tunnels is to protect residents in high buildings or land. In this project, some residents live on hills (Kingsgrove) and others (e.g. in Arncliffe) live in high buildings. There are experts who say that stack emissions are not safe and should be filtered.

- Increases in traffic will spill over into other roads and streets but because the traffic modelling only extends to two intersections past the boundaries of the Westconnex project, these increased levels have not been modelled or presented in the EIS.

As well, the assessment of air quality and noise impacts are completely dependent on the traffic modelling. The traffic impacts are uncertain and for this reason, **the air, noise, social impacts and health risk assessments cannot be regarded as reliable.**

Air concerns [redacted] protest at McCallums Hill Primary School about the WestConnex project. Picture: Chris Lane

These children will be exposed to elevated levels of dust and pollution at home and school. A construction zone a few metres from their home. Heavy truck movements past their school. Four trucks every minute during off-peak. And on completion, exposure to dangerous unfiltered exhaust from the chimney stack.

16.3.3.1 Home acquisitions

Home Owners (reported in the media) claim that lower than market value is offered for their homes and that they are bullied by RMS staff. Longstanding communities members are being forced to move far from their social networks.

Renters are also having to seek legal advice for relocation compensation. One long term renter in the same home for 18 years was only offered $5000 to relocate.

The disadvantaged residents in social housing (including independent homes for people with special needs) of RMS property have not had their needs addressed in the rush to evict hundreds of people from their homes.

Most of these people forced from their homes will likely find they have to move some distance away from where they have established support networks. This would be particularly hard on the frail and elderly.

I object to the mitigation of offer of 'counselling' which even if it does exist (and some say it has not been offered to them) would be of little assistance.

16.3.3.2 Unsafe Removal of Asbestos**.**

This dangerous substance has been located in several locations across the Westconnex project already. There is evidence that trucks removing asbestos have not been following appropriate safety standards such as sprinkler systems, washing down trucks before departure, and neglecting to properly cover loads.

I object to the contempt Westconnex has shown for the health and safety of residents within the locations and on route to Erskine Park where soil contaminated with asbestos has been dumped without being wetted or properly covered at the time of disposal.

The asbestos strongly suspected in the Earth Mound at Kingsgrove is a significant concern to all.

16.3.3.3 Divisive Infrastructure

I object to a 'solution' that results in a dreadful outcome on the amenity for all impacted suburbs. A wide, dirty and noisy toll road and the spaghetti interchanges thrust through suburbs that form part of Australia's 19th and 20th century history including the destruction of heritage listed homes and historic buildings.

16.3.3.4 Mental Health

The stress imposed on people by the Westconnex will increase the likelihood of anxiety and depression. The grief people will experience watching the suburb and urban landscape they love permanently destroyed has not been sufficiently addressed in the EIS social impact statement.

The permanent impact of this toll road on thousands of people's physical and mental health through

- visually divisive spaghetti interchanges
- noise barriers -that we know little care to landscaping for residents will be addressed –ref M5 KGR landscape design aka bare noise walls
- prominent and unfiltered exhaust stacks a constant reminder that residents and workers and their families are being poisoned by high levels of pollution
- loss of accessibility by pedestrians and cyclists
- impacts on the elderly for mobility, safety, connectivity and isolation
- impacts to the community and schools with the loss of neighbours
- impacts on the significant number of people forced to leave their home and community – loss of social networks and loss of school mates.
- stress and anxiety brought on by living in a permanent high noise and highly polluted environment.

16.3.3.5 Social Infrastructure

Stated mitigation - Landscaping treatments for the benefit of residents. Let's revisit the landscape design of the King Georges Road Interchange – hundreds of metres of bare noise walls because it is easier for the maintenance crew to inspect. Never mind the residents or professional pride or genuine appreciation for the huge disruption caused to residents. Ugly bare walls.

I object to the likely outcome facing residents of the landscaping treatments being a typical, visually divisive structure.

16.3.3.6 Loss of vegetation

I object to the loss of any vegetation planted as part of the rehabilitation/landscaping works following the construction of the Westconnex motorway. I have often been forced to travel on the M4 between the Sydney and the Blue Mountains. Over many years, I have watched side vegetation grow and provide visual relief, shade and refuge. I object to watching this vegetation being torn down, especially as once upon a time, the construction of the M4 motorway was then supposed to be the

answer to Sydney's east/west transport problems. I object that this existing motorway vegetation is seen to have no real value within the EIS.

I object to the destruction of significant tracts of parks and trees for the New M5.

I object to the impact upon the habitat of birds and animals which live, forage and shelter amongst the vegetation and trees to be lost due to the construction or operational needs of the project.

16.3.3.7 Car Dependence

Build a city for the people – and they will come. Build a city for cars – and congestion will prevail.

Ironically, it is these suburbs – targeted for destruction by Westconex – that demonstrates what the NSW Govt should be the planning for new outer suburb communities. The walkability factor - with ready public transport and local shopping centres. Local employment opportunities or employment centres (including high value jobs) within 60 minutes by public transport. Shared community spaces for gardening and leisure and social connectivity. Cultural and entertainment facilities for all ages.

The infrastructure planning for the new western suburbs, such as near Camden is woeful, with only 7% of Camden residents using public transport. Westconnex promotes socially isolating car dependence and the environmental impact of ever increasing traffic noise and air pollution – and does not provide residents of the western suburbs with any relief from congestion.

I object to this proposal as it is the wrong project for the wrong time.

16.3.3.8 Biodiversity and natural environment

Australia has the notorious distinction of having possibly the worst extinction record on earth according to Richard Kingsford, professor of environmental science at the University of NSW. This is predicted to continue without serious changes to the way we conserve our environment

16.3.3.9 Biodiversity effects are defined narrowly in focusing on potential impacts on Threatened Species.

Methodology and EIS statements re "the highly modified nature of the project footprint"

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.

The EIS field surveys (observations in the field) are very limited in duration and season (as usual in an EIS) – the "short duration of surveys" is acknowledged as well as **"it is possible that seasonal**

species were not identified"(20-3): for this EIS it was 1 day (12/2/15: no number of hours specified) and one night (27/2/15: also no duration specified) in one area (not specified where), with additional surveys on 12/3/15 and 26/6/15 "to investigate areas not covered by the previous surveys" (20-3). (It is not specified where if a physical location is referred to, nor whether it was day or night, and the duration).

Repeated sampling over some time period is really needed to develop anything representing a comprehensive survey. And if you are not (inclined to be) looking for it, you don't tend to find it, and if you are quite time limited as all EIS's are, you are falling well short of what is a satisfactory, let alone a rigorous survey process.

16.3.4 Endangered Fauna

16.3.4.1 Green and Golden Bell Frog

THE endangered Green and Golden Bell Frog is under threat as secret plans to build the WestConnex toll road through one of its last remaining habitats were quietly lodged to avoid public scrutiny.

The Green and Golden Bell Frog was once the most common frog species in the Sydney region but it now reduced to only two secure populations in the Sydney region – Kogarah and Homebush

The proposed development for WestConnex occupies the same area as the Green and Golden Bell Frogs on Kogarah Golf Course. Out of the seven locations where they 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. Further the only two locations that are not impacted only supported small numbers of frogs. 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.

Scientists are studying several species of Australian frogs - including the endangered green and golden bell frog - whose skin secretions are toxic to the multi-drug-resistant golden staph know as MRSA. The GGBF secretions may be the wonder drug of the 21st century. Yet, the overall WestConnex project will more than likely be responsible for the extinction of such an important species, as part of the M5 East section.

THE endangered Green and Golden Bell Frog is under threat as secret plans to build the WestCONnex toll road through one of its last remaining habitats were quietly lodged to avoid public scrutiny.

16.3.4.2 Rare Grey Headed Flying Fox

The EIS acknowledges that **Grey-headed Flying-foxes (GHFF)** use the area when foraging for food. An evening field study, consisting of two evenings only, confirmed this.

The project footprint is well within the nightly foraging range of the Clyde/Duck River camp, as well as other urban Sydney GHFF camps.
Urban GHFF camps have become important to the survival of the species which is now classed as Vulnerable under Federal and State legislation.
Neither street trees nor private garden trees have been included in loss of area calculation (see more on this below). Trees in these "unaccounted for" areas can be and are very important food resources for GHFF feeding.

This foraging habitat should have been quantified in their assessment and their conclusion re GHFF foraging habitat impact. As a result the area and significance of foraging habitat has been understated. On 20-16, the EIS states that "These planted trees do not constitute habitat critical to the survival of

the Grey-headed Flying-fox."

As there is currently no declaration by either the NSW or Federal Government as to what constitutes critical habitat this statement is disingenuous.

Stating under the heading Cumulative Impacts (20-20) that the combined Westconnex projects would result in "the removal of mainly planted vegetation and associated fauna habitats" (20-20) is not an adequate assessment of the whole Westconnex's project impact on Grey-headed Flying fox foraging habitat.

This species in its increasingly urban environment relies on much planted vegetation. Indeed the number of urban camps now in the Greater Sydney area is a result of the available food provided by such urban planted landscapes in proximity to camps – themselves also located in some cases amongst planted vegetation, especially as suitable habitat elsewhere in the species range has significantly contracted since European occupation (estimated at 50 % loss: Eby,P).

The whole Westconnex project – combined M4E and New M5 will impact on urban GHFF foraging habitat to a significant degree.

Grey Headed Flying Fox by Andrew Meares

16.3.4.3 Eastern Bentwing Bat

The impact on this species will be the loss of foraging habitat and the disturbance of roosting sites. Again, as similar to all of our native animals within Sydney metro, the significant and continued loss of vegetation will have a serious impact on these local communities.

16.3.4.4 Micro – bats (Large-footed Myotis and Eastern Bentwing Bat)

Given the very limited field surveys undertaken and poor quality recording of calls during these, the EIS cannot substantiate claims about the extent of use of existing infrastructure as roosting sites, nor claims about breeding habitat. The EIS claims there is no breeding habitat in the study area, but a breeding habitat can also include roof and wall cavities in the absence of tree hollows.

Nor is there substance to the claims about re-colonising new roosting sites eg. continuing to use culverts post construction disruption (20-16). There is no evidence quoted to indicate this will happen.

16.3.4.5 Statement that vegetation connectivity is limited

Some animal species manage quite well in small and fragmented patches, 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. Given the EIS has not quantified nor assessed the ecological role of private gardens and street plantings (see above), EIS comments about connectivity do not tell the whole story and so the potential connectivity (and ‘stepping stones’) that exist via this vegetation is ignored.

16.3.4.6 Cooks River Castlereagh Iron Bark bushland

Another cumulative impact on our natural environment, with the loss of a critically endangered stand, a development condition of the first M5, will be destroyed.

Threatened Flora - **Cooks River Clay Plain Scrub Forest**, located north of the M5 East Motorway, was significantly impacted by the original M5 construction. The remnant remaining is in good condition and is used by the Grey Headed Flying Foxes for foraging.

The Scientific Committee, established by the Threatened Species Conservation Act, had made a final determination to list the Cooks River Clay Plain Scrub Forest as an ENDANGERED ECOLOGICAL

COMMUNITY on Part 3 of Schedule 1 of the Act. Listing of Endangered Ecological Communities is provided for by Section 12 of the Act. (THREATENED SPECIES CONSERVATION ACT 1995 No 101)

Noted by the Scientific Committee that they are of the opinion that Cooks River/Castlereagh Ironbark Forest in the Sydney Basin Bioregion is likely to become extinct in nature in New South Wales unless the circumstances and factors threatening its survival or evolutionary development cease to operate and that the community is eligible for listing as an endangered ecological community.

The community had worked hard to save this from M5 version 1.

16.3.4.7 Rosecomb – at Wolli Bush found

Some months back, Fungi displaying a rare abnormality linked to vehicle pollution have been found near the existing M5 emission stack at Turrella.

Joanna Robinski of WCPS likens Rosecomb to a dead canary in a coalmine. "Finding Rosecomb is another wake-up call for local residents," she said. "Since 2012, when the World Health Organisation upgraded the status of diesel fumes to the highest level of human carcinogenicity, we've had confirmation of the ill-effects of pollution. This provides further evidence that living alongside emission stacks negatively impacts the biota of our environment as well."

The abnormal fungi – found only near the stack – needs further assessing.

16.3.4.8 Ramsar Wetlands

Wetlands provide significant economic, social and cultural benefits. They are important for primary products such as pastures, timber and fish and support recreational and tourist activities. Wetlands also help reduce the impacts from storm damage and flooding, maintain good water quality in rivers, recharge groundwater, store carbon, help stabilise climatic conditions and control pests. They are also important sites for biodiversity.

Wetlands cover about 9% of the earth's surface and are estimated to contain around 35% of global terrestrial carbon. Wetlands act as sinks for carbon dioxide and other greenhouse gases, especially if their vegetation is protected and their natural processes are maintained.

Without biodiversity the variety of all life forms, local ecosystems and in turn, human societies, cannot survive. Although highly urbanised, the City has retained several small **bushland** and **wetland** areas which play an important role in terms of providing food, habitat and shelter for native animals. These areas are deemed to have 'conservation value' (meaning they are worth preserving for future generations) because they represent ecosystems that would otherwise be lost.

The proposed F6 extension (which is referred to as a given in the EIS although it is not even in early stages of planning) will likely also impact on the Rockdale wetlands – another significant loss to our natural and human environment.

I object to the sectional approach taken to the Westconnex project which makes it difficult to properly assess the cumulative impact on our wetlands across both Westconnex and Southern Extension

I object to the unwarranted destruction of what remains of our natural environment for a project which is managed by politicians and business people who continue to hide the business case on which it is based. Westconnex managers have been unable to properly debate or refute the many informed critiques of the project.

16.3.4.9 Conclusion

In an age of shrinking backyards and an ever-increasing urbanised metropolis these remnants of natural spaces and parks are much more than sanctuaries for our native wildlife and remnant flora -

they are places for individuals, families and groups to play, relax and to simply enjoy the wildlife and flora that exist in these spaces. These places have important cultural and social significance, and they need our protection. Climate change, greenhouse gas emissions and noise pollution further strengthen the argument that building more motorways is not the right direction to take.

Our aim is to give our natural spaces a voice, and to lobby State, Federal and Local governments to protect them for wildlife, for our community and for future generations, and to propose sustainable transport options rather than freeways.

Is the cost and destruction to endangered fauna and flora, hectares of parks, air quality and loss of many homes and businesses worth a one kilometre per hour speed increase (source KGR M5 eis pg 'v')?

16.3.5 Flooding

During construction, there is the potential for local catchment runoff to enter project excavations at the interchange locations and impact the construction ancillary facilities. Construction activities also have the potential to exacerbate flooding conditions in adjacent developments. The mitigation stated are physical barriers designed to protect the works areas and tunnel entries so as not to increase flooding conditions in adjacent areas. The public needs full independent advice on the safety of the tunnels which is not possible in the short period allowed for consultation.

16.3.6 Urban Salinity

I am concerned about the potential for salinity damage that can shorten the life of urban infrastructure such as roads, buildings, water and sewage pipes. This leads to costly maintenance and repair by homeowners and councils.

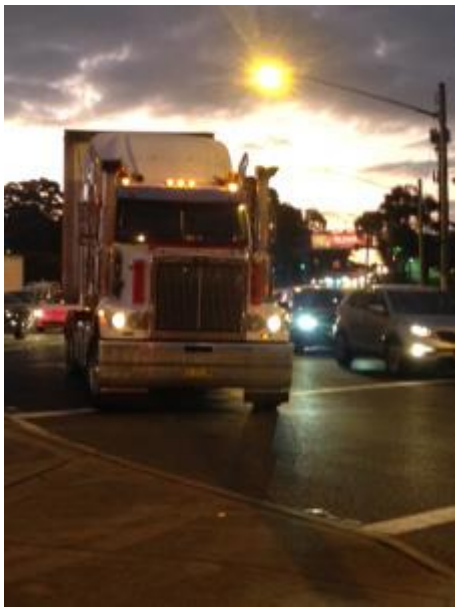
The movement of excess water and salt in parks and gardens can affect plant growth and cause plant death. Sports grounds and recreation areas affected by urban salinity may become bare, unattractive and unusable. Soil properties can be altered significantly making it hard to revegetate these areas.

Pockets of native vegetation in and around urban landscapes may also be affected. This can have serious consequences including the disappearance of native flora and fauna and poor downstream water quality.

I am concerned about the impact of groundwater and the potential for increased risk of flooding due to the reduction of greenspace.

The public needs access to more independent technical information so that they can understand the true impacts of the project.

I conclude that Westconnex comprehensively fails one of its claimed core objectives - *'Protect natural and cultural resources and enhance the environment'* is not met by the Westconnex project.



Residents studying the EIS while questioning the legality of early drilling in Haberfield

17 The project represents lost opportunity for better transport investment

As mentioned earlier, it is a tragedy for Sydney and NSW that the rational initiatives put forward by Ms Berejilian in the NSW Transport Master plan have been cast aside for this flawed project.

Alternatives that would have been regarded as long term assets as put forward by EcoTransit in their recent newspaper :

- Parramatta – focused light rail network.
- Modernise rail signaling to increase increase capacity
- East – West Translink – extending light rail network from Dulwich Hill through to the Airpor using unused rail space
- Kinsgrove "Last chance" Park & Ride
- Retrofit two extra stations at Airport Line
- Buyback the Airport line and reduce train fares to standard rates at the Airport stations and also removing the anti-competition clause
- Sydney-Newcastle rail line upgrade (stage 1)
- Parramatta Road Light Rail (CBD to Olympic Park)
- White Bay GreenLink
- Cycling storage at selected stations to complement a rail and ride concept
- More rail capacity and frequent services for the Western Sydney Rail Line

- Pippita Express Solution using spare rail space

The combined cost of all of these projects come in significantly less than $15 billion and would make a genuine dent in the problem of road congestion. These projects particularly would soak up much of the single passenger vehicles off the M5 and M5, clearing the road significantly for tradies and freight.

The science is clear – **Faster road network speed depends on faster public transport**. Take for example the recently built Gold Coast Tram. Patronage on the tram was delightfully beyond expectations. As a result, the performance of the parallel Gold Coast Hwy also significantly improved.

This is genuinely a tragedy to Sydney and NSW, particularly taking into account the WDA boast contained the King Georges Road M5 interchange (page v in volume 1) that "Sydney's network will improve by one kmph on completion of the entire project". Wow. Or more to the point, rather an underwhelming outcome.

I therefore reject the WestConnex project in its entirety, as it represents a tragic loss to the people of NSW in honestly addressing the congestion issues of Sydney.

18 The project fails justification that it is in the best interests for the public

I reject the WestConnex project in its entirety, as public health and wellbeing has been completely disregarded. This is a huge gamble on people's health, and the future funds to cover medical costs.

18.1 Health Impacts Summary

- This Human Health Risk Assessment is not accepted as a reliable study of the health risks of the WestConnex project
- This assessment has several serious flaws, but the key one is that it is not independent. It relies completely on the findings of the Air Quality Impact Assessment (Volume 2B, Appendix H), which in turn relies on the WRTM traffic forecast model. It does not question, in any way, the findings of the Air Quality Impact Assessment, thus does not assess the health risks of the very real potential for induced demand on Parramatta Road.
- Both NO2 and PM2.5 levels are already elevated and above guidelines in many of the localities within the project area, so any additional traffic due to induced demand (in tunnels or on surface roads) will add to this situation.

- This risk assessment does not point out that the air quality standards or guidelines used in the EIS may be superseded by stricter ones at the end of 2015 when the new National Environment Protection (Ambient Air Quality) Measure (NEPM) standards are passed
- A truly independent health risk assessment would have concluded that peoples' health was already being compromised in this corridor, and that further "hot spots" are going to be created by the project and that the relevant government authorities should be taking action about it, including by urgently implementing the National Clean Air Agreement.
- Other cleaner forms of transport are required in this corridor.
- Diesel fuel vehicles need to be phased out quickly, as is happening in France and proposed in other parts of Europe.

18.2 The Westconnex/AECOM Human Health Risk Assessment reaches the following overall conclusions

- The tunnel doesn't need filtration as there will be negligible pollution at the portals and the ventilation stack will disperse pollutants across the air-shed with negligible effect on local residents
- A detailed assessment of two key pollutants (nitrogen dioxide – NO2 – and particulate matter measured in microns – PM10, PM2.5) is required, given their known associated health effects and the impacts of their co-exposure (common in urban environments) and the known main source of PM2.5 (and finer) in the urban environment being vehicle diesel exhaust
- Potential health impacts associated with changes in air quality (specifically NO2 and PM) within the local community was assessed as low and essentially negligible
- There are some residents who will have an increased exposure to PM as a result of the redistribution of emissions from surface roads
- There are some residents who will be exposed to less PM2.5 as a result of the project
- Summary of mortality data for three key factors (COPD, lung cancer, cardiovascular disease) indicates that Sydney Area Health Service has rates higher than the average NSW rate for all three indicators; summary of hospitalisation data for key factors (asthma, cardiovascular disease, COPD) shows asthma rates similar to NSW and cardiovascular disease and COPD less than NSW rates (possibly accounted for by high GP service level in Inner Sydney)
- Increases in population (and its distribution) of the suburbs within the project footprint will have no impact on the health outcomes

- The time spent exposed to pollutants within the tunnel is very short (minutes) and in the absence of published guidelines for NO2 and PM within tunnels, advises keeping vehicle windows up and air con on recirculation setting
- Potential for noise and vibration impacts during construction could result in adverse health effects so management and mitigation plan required for health effects
- After construction, some properties will have elevated road noise so mitigation measures are required
- In such a complex project, there are inherent uncertainties in each of the methods used to estimate emissions and concentrations, and there are limits to how accurately any impacts in future years can be predicted

18.3 Summary of key air quality issues accepted by the Health Risk Assessment

- By 2021, without the project, the maximum (residential and commercial) 1-hour concentration of NO2 estimated to be (in micrograms per cubic metre) 375ug/m3 and 360ug/m3 (respectively) – which is well above the guideline (of 246ug/m3); with the project completion, the levels estimated as 307ug/m3 and 286ug/m3 (respectively) – still well above the guideline.
- By 2021, with the project, the cumulative (maximum annual average, rather than acute) NO2 concentrations estimated to be below the guideline of 62ug/m3
- By 2031, with the project, cumulative NO2 concentrations estimated below the guideline of 62 ug/m3
- By 2021, without the project, the maximum (residential and commercial) 24-hr average concentration of PM2.5 estimated to be 29.3 ug/m3 and 30.5ug/m3 (respectively) – which is significantly above the guideline (25ug/m3); with the project completion, the levels estimated as 28.2ug/m3 and 26.6ug/m3 (respectively) – still above the guideline
- By 2031,with the project, PM2.5 levels estimated as above the guideline
- By 2021, without the project, the maximum (residential and commercial) 24-hr average PM10 concentration estimated as 54ug/m3 and 55.4ug/m3 (respectively) – above the current guideline (50ug/m3) and well above the recommended (from the 2014/15 review) of 40-50ug/m3

- By 2021, with the project, the maximum (residential and commercial) 24-hr average PM10 concentration estimated as 52 ug/m3 and 50ug/m3 (respectively) – above both the current guideline and recommended (review) guideline
- By 2031, both without and with the project, PM10 will be above both guidelines
- Community locations most at risk by 2031 of mortality, cardiovascular and respiratory illness from increases in PM2.5 concentrations are: **Homebush Boys High School, Ella Community Child Care Centre.St Joan Of Arc Catholic School, Dobroyd Point Public School, Woodfield Aged Care Centre**

18.4 Methodology of the Health Risk Assessment

The Risk Assessment relies on key aspects of the Air Quality Impact Assessment including:

- The tunnel design claim that there will be negligible impact at sites of portals and ventilation stacks
- The findings of the air quality report within this EIS, which relies heavily on the air quality data from the 3 OEH monitoring stations at Rozelle, Chullora and Earlwood, one of which, Rozelle, does not monitor PM2.5
- Traffic estimates within this EIS (which in turn rely on the population estimates).

For the health indicators, it relies on:

- data that is five (5) years old for the key health indicators
- hospitalisation data only for respiratory indicators,and *has not included any GP data relating to consultations*.

It does not include the demolition of buildings (houses and commercial) in the risks associated with the project, even though a high proportion of pre-1980's buildings could have some asbestos on the sites.

18.5 Flaws in the Health Risk Assessment Methodology

- It accepts the claim that the tunnel design is "state of the art", and doesn't canvass options to filter using actual "state of the art" like the Hong Kong Wanchai By-Pass tunnel and Madrid (Spain) M30 Ring-Road.
- Residents at the Kingsgrove RSL (no) information session were advised by the Tunnel Ventilation representative that the Hong Kong tunnel is filtered due to the proximity of 25

story apartment buildings. This admission by WDA staff proves that Sydney is receiving a cheap 'ventilation' solution despite a similar situation to Hong Kong

  - Arncliffe has existing high rise and more planned
  - McCallums Primary (on a hill) is located very close upwind from the Kingsgrove business park poison stack located in a valley.

- It accepts a tunnel design that infers there will be no pollution at tunnel entry or exit ramps, with the speed into entrance ramps relying on the "piston effect" to pull vehicle emissions into the tunnel and into the ventilation stack. A close questioning of the "experts" (at a number of the WDA consultations) about tunnel exit ramps where they hit Parramatta Rd and West City Link, found they agreed that **there would be pollution in the vicinity of ramps if traffic hits congestion on exiting, and the same would be true for queuing traffic to enter tunnels. Thus their definition of "portals" is strictly that entry/exit area within the tunnel, not leading into or out-of the tunnels.** An independent risk assessment would have noted the possibility of build-up of pollution around these portal sites and the consequent health impacts. Kingsgrove, Bexley North, Arncliffe and St Peters have portals thus adding to the polution issue.
- An AMA submission into air quality states that the current air quality monitoring system in Australia does not adequately capture data relating to the exposure of vulnerable groups; and information on the levels that specific communities are exposed to, and the subsequent risk, is often unknown; the AMA believes the current monitoring system is only capturing data that represents exposure of the broader population, not people at "hot spots" – these "hot spots" would include the large number of residential and commercial properties within 300 metres of major roads (Australian Medical Association (March 2013), Submission to the Senate Standing Committee on Community Affairs, Inquiry into the impacts on health of air quality in Australia, p7). The Human Health Risk Assessment itself indicates there are 10,000 residences and commercial units (which includes multiple apartment blocks) within the affected zone. A conservative estimation of this population would be 40,000 people who may already be living in "hot spots".
- the data collected at the four (4) roadside air quality monitoring stations can be supplemented by similar data from the Lane Cove study (Cowie et al, 2012) collected at Parramatta Road Camperdown in 2006-2008, which indicated highly elevated levels of NO2 and PM2.5. The traffic count (2005) at the Camperdown (control) site in that study was 65,000 vehicles/day, which is a little fewer than the City-West Link count of 69,000 vehicles/day and higher than Parramatta Road (at Dalhousie St Haberfield) of 54,000 vehicles/day (NSW RMS Average

Daily Traffic 2012). All this data shows that levels are already higher than the guidelines, which themselves have been questioned by the AMA and several other groups in their submissions to the Senate Standing Committee On Community Affairs Inquiry Into The impacts On Health Of Air Quality In Australia.

- It should have noted that the new national air quality standards to be endorsed at the end of 2015, well before the project starts, may include higher standards for PM10 than are used in this EIS. The outcome could be many more "hot spots" than acknowledged in the Air Quality Impact Assessment.
- The study should have noted that several international studies have shown the adverse health effects of living less than 500 metres from major roads. In one longitudinal study of 2,300 children in Los Angeles, Guaderman et al found that improvements in the air quality (particularly PM2.5 and NO2) over several years had dramatically improved the lung function of children living less than 500 metres from major roads (Gauderman WJ, Urman R, Avol E, Berhane K, McConnell R, Rappaport E, Chang R, Lurmann F, Gilliland F.2015. Association of improved air quality with lung development in children. N Engl J Med. 372(10):905-913). A paper that calculates the medical costs of air pollution indicates that even the NEPM standards give a false sense of "safe" levels of pollution. This report states that as average levels of air pollution increase so do the average adverse health effects and that in fact there is no safe threshold. The paper claims that proper cost benefit analyses should be undertaken to accurately quantify adverse health effects due to both local and general increases in air pollution (Barnett, A, 2014 "It's safe to say there is no safe level of air pollution" Australian and New Zealand Journal of Public Health 2014 vol. 38 no. 5). The health risk assessment does not acknowledge any critique of what is considered a safe threshold because it completely accepts the assumptions of the Air Quality Impact Assessment. Available evidence doesn't indicate there is an exposure threshold for PM below which health effects do not occur; thus this risk assessment should have erred on the side of caution.
- The study should have noted the large number of people living, working and schooling less than 500 metres from the M5, King Georges Road and Stoney Creek Road are at an already elevated risk of health damage; it also should have noted the increased risk if this corridor does not have the reduced traffic volume estimated by the WRTM, given the additional sources from the tunnel traffic.
- A scenario including all risk factors for 2031 should have been discussed – that of increased traffic on the surface of Parramatta Road the full length of the project. The concept of 'induced traffic demand' is a real one and has not been taken into account by this health risk

assessment. A meta-analysis of induced demand (Cervero, R, 2001, Induced Demand: An Urban and Metropolitan Perspective, Paper prepared for Policy Forum, US Environmental Protection Agency) concluded that, whilst there were a range of elasticities associated with increased demand with new road infrastructure, the phenomenon should not be trivialised

- The study ignores the possible contribution of the project to the estimated health costs of the Sydney region. In 2005 in Sydney motor vehicle pollution alone accounted for $1.5b in health costs (Australian Bureau of Transport and Regional Economics, 2005, cited in Senate Standing Committee On Community Affairs Inquiry Into The impacts On Health Of Air Quality In Australia, NSW Environment Protection Authority Submission, September 2013, p15). As this report states … "particle pollution is the driver for the high public health costs of air pollution" (ibid).
- The mortality data for three key factors (COPD, lung cancer, cardiovascular disease) shows that Sydney Area Health Service has rates higher than the average NSW rate for all three indicators, yet this risk assessment does not question whether exposure to already elevated levels of NO2 and PM2.5 may be a cause of these elevated rates.
- The reliance on five years old data for the key health indicators is problematic, given background sources of key pollutants (NO2 and PM2.5 and PM10) have increased in that five year period, as evidenced by vehicle fleet data. According to the Sydney Morning Herald (March 15-16 2014) the number of diesel vehicles on the road in Australia has more than doubled since 2005. ABS data shows that in 2015 there are 3.6 million diesel powered vehicles, accounting for 19.7% of the fleet; and over the five year period from 2010, the number of Passenger vehicles and Light Commercial vehicles registered with diesel fuel increased by 96.4% and 62.9% respectively (ABS, Motor Vehicle Census, Australia, cat no 9309.0). This increase in diesel fuel use would have had both short term and longer term impacts on health in the period since this health data was published and has not been captured by it, nor has this health risk assessment mentioned increased risks from the growing diesel fleet. The other concern with growth of the diesel fleet relates to car manufacturers using software called "defeat devices" that allows the masking of exhaust emissions in pollution control tests. Recent revelations (eg SMH, Sep 23 2015) of such corruption by what was thought of as a "good corporate citizen" – the Volkswagen company – indicates the distinct possibility that other manufacturers may be doing the same. If the environmental protection laws are being flouted by many diesel fuel vehicle makers, then the claim by this EIS that tougher laws are making the Australian vehicle fleet (and therefore the air) cleaner is

questionable. The best option for any government keen to improve air quality in polluted parts of Sydney would be to quickly phase out diesel vehicles.

- Hospitalisation data for respiratory indicators should have been supplemented by GP survey data (given Medicare does not collect this level of data), collected by the relevant Local Health Districts.
- Sydney Area Health Service collects data on health risk factors, published for each Local Health District. The risk factor model is one that can be called a "personal behaviour" model. It includes risky alcohol drinking, smoking, consumption of fruit & vegetables, being overweight or obese, and adequate physical activity). It does not include external risk factors, like living within a few hundred metres of a busy road. The fact that the Area Health Services in NSW do not collect data for external risk factors, although they are known (e.g. exposure to coal dust (mainly PM10) and road pollution (notably NO2 and PM2.5) means that more meaningful data is not available to these types of Human Health Risk Assessments.
- The health impacts from noise and vibration seem to be underestimated by this health risk assessment. The writer should have conducted an independent analysis of that assessment, rather than relying on its findings. A independent review of the noise and vibration section of the EIS (which will be published by the People's EIS soon) raises uncertainty in a range of areas of the noise and vibration assessment. It states that, given the number of potentially impacted properties and people within the project area, further work needs to be done to ensure the local community and other affected stakeholders are provided with a fully informed assessment. This needs to 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 which does provide for any further input from the community.
- The health risk assessment should have included a risk assessment for asbestos and a management plan for mitigating risks, given serious community concern has been expressed over issues with asbestos removal and treatment at Granville (M4 widening stage) and at Alexandria (M5E stage).
- It is common practice in health research (including health risk assessments) to identify and analyse any related health studies to understand their the implications for the project being assessed-in this case the WestConnex project.Two such studies have been conducted on the Lane Cove Tunnel and on the M5East tunnel. The risk assessment ignored the 'fine print' findings of both of these studies. The Lane Cove study was of the short-term respiratory (asthma-like symptoms) health effects of exposure to emissions from the tunnel stack. The study was conducted 2006-2008, with thirty six (36) participants originally, falling to twenty

(20) by 2008. This is a very small cohort from which to draw any strong conclusions. The "control site" was Parramatta Road, Camperdown. The main conclusion was that residents near the eastern tunnel stack reported increased symptoms (even though there were no increases in pollutants) and this could be accounted for by other sources of pollution not measured in the study (e.g. particles smaller than PM2.5 and/or volatile compounds) or other unknown sources. The study also found significant adverse effects of increased airway inflammation, and chest and eye symptoms associated with exposure along Parramatta Road Camperdown after only 2-hour exposure periods. The authors recommended a follow-up study to better understand the effects of the ventilation stack. (Christine T Cowie et al, 2012, 'A randomised cross-over cohort study of exposure to emissions from a road tunnel ventilation stack', BMJ Open 2012;2). No further studies have been conducted.

- In the study of the pollution effects of the M5 East tunnel (NSW Health, 2012), it was stated that the ventilation stack was an important source of air pollution in the area within a 2 km radius, contributing 23% of NOx and 17% of PM10. The study's aim was to consider cancer incidence in the vicinity of the tunnel stack. Whilst it found there was a significantly higher incidence of lung cancer in postcodes immediately around the stack, the study concluded that it was unlikely there was a causal link. However, the study did qualify its overall conclusions with the comment that the descriptive epidemiological method used in the study was a relatively weak tool to resolve the type of issues under investigation. The study methodology was unable to discern the types of lung cancers screened in the area (smokers vs non-smokers). The study's argument was that, given lung cancers can take a number of years to become apparent, the higher incidence recorded after the opening of the tunnel may not have been connected to the stack emissions. The study concluded that the higher incidence of lung cancer probably pre-dated the locating of the stack in that area. This is an alarming finding, given that the cancer registry data would have been available to NSW Health, Department of Main Roads and the other bodies responsible for the EIS prior to the building of the M5East. So it would appear that an area of Sydney which already had an elevated incidence of lung cancer was chosen as the site of the M5East ventilation stack, when health research was already indicating the causal link between particulate matter and lung cancer. Given that mortality data for three key factors (COPD, lung cancer, cardiovascular disease) indicates that Sydney Area Health Service has rates higher than the average NSW rate for all three, is it possible that this project is again ignoring the potential health impacts of a project that independent experts predict will increase total traffic pollution over time.

18.6 Flaws in the assumptions on which EIS health findings are based

- The health risk assessment does not take into account the possibility of total higher traffic along our local roads . An Australian Government Department of Infrastructure and Transport Research (2012) report into traffic growth in Australia shows that traffic per person in Australia has grown steadily between 1965 and 2011. The measure of traffic volume (number of vehicles x distance travelled = vkt) in all states and major cities for this period indicates that the pattern of increases has been consistent, with only minor changes in response to petrol price rises, unemployment and the global financial crisis. Forecasts of future growth in traffic volumes indicate that traffic in Australia will rise from 55 billion vkt per quarter in 2011 to more than 65 billion vkt per quarter in 2020.

19 The project fails in applying an appropriate solution to a 21st century problem of congestion

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.

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:

(a) 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 (1)

(b) Serious human health impacts due to petrochemical vehicle emissions/smog, including:

i) Lung cancer,

ii) Asthma,

iii) Heart disease,

iv) Impaired lung development in children living near motorways/exhaust stacks.

(c) Waterways contaminated with road runoff (heavy metals and carcinogens in brake and clutch dust, exhaust particulates etc.).

(d) High traffic crash costs (of deaths/traumatic injuries and material damage).

(e) Urban sprawl and increasing commuting distances.

(f) Social isolation for non-drivers living in car-dependent suburbs.

(g) Noise pollution from traffic and its impacts on sleep.

(h) Impacts on visual amenity (pollution stacks, concrete interchanges, concrete flyovers).

(i) Extreme summer temperatures (urban heat island effect).

(j) Community destruction and severance.

(k) Destruction of heritage.

(l) Less incidental physical activity from walking and cycling (including to/from public transport), resulting in higher rates of obesity, diabetes, cancer and heart disease.

(m) Increased chauffeuring burdens for parents and carers.)

(n) Less independence for children.

(o) High per-capita greenhouse gas emissions.

20 The project contributes to carbon emissions

A shift from car-centric transport to one based on public transport, walking and cycling can reduce carbon dioxide emissions by 40%, according to a report by the Institute for Transportation and Development Policy and University of California.

"Transportation, driven by rapid growth in car use, has been the fastest growing source of CO2 in the world, said Michael Replogle, ITDP's managing director for policy and co-author of the report. "An affordable but largely overlooked way to cut that pollution is to give people clean options to use

public transportation, walking and cycling, expanding mobility options especially for the poor and curbing air pollution from traffic."

"The analysis shows that getting away from car-centric development will cut urban CO2 dramatically and also reduce costs, especially in rapidly expanding economies," said report co-author Lew Fulton, co-director of NextSTEPS Program at the Institute of Transportation Studies at UC Davis. "It is also critical to reduce the energy use and carbon emissions of all vehicles."

Given that climate change is real, and every county must endeavour to reduce emissions significantly, the WestConnex project is not best practice. I therefore reject this project in its entirety.

This 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 on Parramatta Road than predicted) of increasing these levels across the Corridor. Accordingly, I strongly object to the entire WestConnex project.

20.1 Strategies to manage climate change risks put off to "detailed planning" stage

The Climate Change Risk Assessment portion of the M5 EIS conjures an image of a durable roadway system withstanding the tests of a changing climate. While the document incorporates climate change into the risk profile of the project, it ultimately recommends very

little in the way of direct risk management strategies other than the "consideration" of various potential risks in the next phase of the design process and a few non-binding suggestions as to what these design adaptations might look like (see pages Chapter 25-9 & 25-10).

The calculation of a Greenhouse Gas saving is based on three basic deceits: 1) it conceals the predicted actual change in GHG emission (27% increase over 10 years); 2) there is a huge underestimation of the induced travel effect); and 3) the comparison with a do-minimum scenario is a false comparison.

1. **Actual 27% increase in emissions.** The modelling predicts an actual 27% increase in GHG emissions between 2021 and 2031 with the project (though there are no statistics to compare with current emissions). This is completely incompatible with Australia's commitment to reduce GHG emissions by 28% by 2030 or with the agreements reached at the Paris Conference to be carbon neutral by 2050. We need to be moving rapidly to reduce road travel which is inefficient. For example, road haulage emits three times more GHG than rail for the same tonnage. The presentation of the EIS, focussing on the purported saving compared to a do-minimum scenario is deeply dishonest in that it conceals the dramatic increase in emissions that will occur under this project, as well as under the do-minimum scenario.
2. **False comparison.** The EIS compares GhG emissions from traffic to a scenario without major road works. Considering that billions of dollars of public money is being spent on the project, the proper comparison should be with one where that money is invested in an alternative project that delivers a reduction in road use (and hence emissions). The predictions assume that road traffic will be about 107,000 journeys per day in each direction in 2021 and 130,000 by 2031. As an alternative, a bi-directional light or heavy rail line could reduce this by as much as 40%, providing a much larger reduction in GhG emissions.
3. **Induced travel.** There is a basic understanding in transport economics that if you add capacity on a congested road network, the number of vehicles using the network will increase until the congestion returns. While the EIS acknowledges such an "induced travel" effect, there is no explanation in the 258 page transport report about what assumptions were used. The report seems to have hugely underestimated the effect, as can be seen in some of the predicted traffic volumes. For example, it predicts if that all of Westconnex is built, traffic flows in the project area will be reduced by 10% and

on the Pacific Highway around the Cook River by 70% compared to the do-nothing scenario. This conclusion must be based on some childishly naive assumptions. In reality, users of these roads will adjust to any new ease of movement by increasing journeys. The main reason that the EIS predicts a reduction in GHG emissions is that there will be less congestion, based on these predictions of relatively low-flow. But, if the full effect of induced travel is taken into account, the level of congestion will be the same in 2031 as it is now, and there will be more vehicles affected. Thus, instead of a decrease of 2.9% compared to the do-nothing scenario, a 20-30% increase is more likely.

21 . National Trust Conclusions

The National Trust noted in their M4 East submission that this M4 East is only one section of the WestConnex Motorway and that **there will be additional heritage impacts relating to the St Peters Interchange and the future link between Haberfield and St Peters.**

The heritage impacts of the WestConnex Motorway are severe. The public must question whether the financial commitment for the total project in today's dollars of $16.8 billion (inevitably set to rise) would be much better allocated to public transport.

Back in the 1970's – workers refused to demolish 'those old buildings at the Rocks'. These historic buildings are an icon and asset to our Sydney. It is the same with the inner suburbs across the 33km. this is our history. It is gobsmacking that WestConnex project has been proposed with such a significant loss as a result.

I agree with The National Trust in their objection to the WestConnex M4 East proposal because of its severe impact on Listed Heritage Items and Heritage Conservation Areas and because it diverts 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.

21.1 Alexandra Canal – heritage importance

The Alexandra Canal is also at risk by the WestConnex project – yet another piece of our history likely to be destroyed.

Alexandra Canal is of high historic, aesthetic and technical/research significance. Historically, it is a rare example of 19th century navigational canal construction in Australia, being one of only two purpose built canals in the State, with one other known example in Victoria. It has the ability to demonstrate the NSW Governments initiative to create water transport as a means of developing an industrial complex in the Alexandria and Botany areas and exploiting the use of unemployed labour to achieve its scheme.

It played a seminal role in the changing pattern and evolution of the occupation and industrial uses of the local area and nearby suburbs, which included filling large areas of low lying land for development.

Aesthetically, intact original sections of the canal, comprising pitched dry packed ashlar sandstone, provides a textured and coloured finish which is aesthetically valuable in the cultural landscape. It is a major landmark and dramatic component of the industrial landscape of the area, particularly as viewed from the Ricketty Street Bridge and along Airport Drive.

Scientifically, the excavation of the canal provided a valuable contribution to the understanding of the changing sea-levels along the eastern seaboard and the antiquity of the aboriginal presence in the area. Intact original sections of the fascine dyke sandstone construction are rare examples of late 19th century coastal engineering works.

I object to the WestConnex project in its entirety, due to the destruction of our heritage for what is a wasteful project that fails to achieve any of its stated objectives.

22 People's stories

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.

22.1 Willows Nursing Home

According to the GHD EIS Social Impact report, at least five aged care facilities including hundreds of beds lie near the path of the M5 East.

Residents of aged care facilities or their families try to choose the best environment for their final home. High on their list of physical priorities are peace and quiet, a bright outlook and easy access for visitors.

Aged care facilities are both a home for residents and a business. While the EIS economic impact statement did not conduct any consultations with other businesses, 'social infrastructure' organisations such as churches, schools and health care facilities were asked for feedback and nearly all told Westconnex of their concerns.

The Willows Nursing Home was no exception. The GHD report records its many objections including noise, pollution and dust and anxiety about how visitors and staff would access the home both during construction and afterwards.

This is because if the M5 East was to proceed along the planned route, Willows Nursing Home would literally be in the middle of a construction zone and later next to the tunnel exit and unfiltered ventilation stack.

I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.

22.2 People's EIS interview with Sass Inbari.

Sass Inbari has owned Willows Private Nursing Home on Orpington Road, in Ashfield, since 1977. It was his father's before that and Sass built it up from 27 beds to 40. The home provides high care support to its elderly residents, and welcomes visitors from 8.00 am to 8.00 pm daily.

The Westconnex GHD social impact study notes that as a high care residential facility "the impacts of vibration and noise could be detrimental to health and wellbeing of residents."

Sass is concerned about the noise and dust occasioned by the demolition of the buildings immediately behind and next to the nursing home. Later there would be more disruption when this emptied space would be occupied as a construction site for the motorway and a parking lot for hundreds of large diesel trucks that will move in and out of the site each day.

The residents at the Nursing Home are frail and vulnerable. Staff are also upset and it will be a major inconvenience with road closures and works for relatives coming to visit, ambulances, delivery etc.

Bus stops on Parramatta Road are going to be moved, which means it will be harder for relatives to visit the residents.

Sass first heard about the Westconnex motorway on the news like everyone else, then about 3 or 4 months ago he got a visit from Westconnex representatives to discuss his concerns. "They took it all on board but I have not heard from them since," says Sass.

He wants compensation because of the impacts of the construction and of the operation of the motorway, and he is worried he is going to loose business.

He is angry too as he says he doesn't "know what good the Westconnex is going to do. All it will do is just shift the bottle neck towards the city."

He doesn't think people realise what impact the motorway will have.

All the other businesses around him, on Paramatta Road, have been purchased. Sass doesn't wish to be purchased, only compensated. He is stressed and frustrated as he feels there is nothing he can do to change the situation

I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.

22.3 This is the story of Kevin

22.4 Impact on Residents by Westconnex

WestConnex was required to include a social impact study in the EIS. This is Appendix M. The NSW Planning Department required that this section of the EIS should report on the impact of the M5 East on communities from planning through to operation of the WestConnex. GHD was hired to work alongside AECOM to produce the social impact study. According to its website, GHD is a global services company that operates in the "markets of water, energy and resources, environment, property and buildings, and transportation." It provides, "engineering, architecture, environmental and construction services to private and public sector clients." It is not a specialist in social impact studies.

People's EIS caught up with GHD consultant Anne Mithieux at a Strathfield EIS exhibition session in September. She explained to us that GHD did not interview any people whose houses were being acquired directly which probably explains why her impact study contained very little detail and described the stress and disruption that is already occurring along the M5 route as if it was a future event. She saw her task as recommending mitigation for the impacts of a project that was going to happen. (This is the sort of attitude that is fueling critics' apprehension that the Planning process is a set up.) She was not uncaring but is not very familiar with the area she was studying. She seemed a little surprised about the intensity of the impacts that were already happening.

Two weeks ago, the ABC interviewed Arthur Alibrandi who told the ABC News that his 82-year-old father, Joe who has lived in his unit for nearly 50 years, had been offered an amount by WestConnex that would make it "physically impossible" for his elderly father to stay in the area.

In response, Premier Baird told the ABC, "At times, there has to be a provision for the majority, there are difficulties for some people as part of that… We're doing everything we can in terms of compensation, looking after them, provide provision for a new home."

This statement reveals a similar detachment and apparent lack of knowledge on the part of the Premier. According to the SMH, Slater and Gordon Lawyers, who are representing about 70 property owners affected by WestConnex compulsory acquisitions have found that offers are 20-50 per cent below what clients' properties are worth. This means that residents quite unexpectedly are not only losing their homes but feel they have lost control over where they can live altogether.

I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.

22.5 Kevin : another story from Underwood Road

Kevin and Ann (not their real names) are both in their eighties. Five years ago, they moved to Homebush, a community along the M5 route that will be hit hard by the WestConnex.

Initially, Kevin wasn't bothered by the WestConnex because according to earlier plans, it would have bypassed his home. But in June this year, he was told WestConnex would compulsorily acquire his home and he and Ann must move out by April. As anyone who lives in Sydney would know, nine months is not nearly enough time to unexpectedly sell and find another home.

When Kevin and Ann moved into their home five years ago, they expected to stay there for the rest of their lives. They had specifically chosen the house because it had no stairs, was walking distance to the train station and shops, and in a quiet street.
When interviewed for the People's EIS this week, Kevin said,

"I am very unhappy about the WestConnex. I can't find anywhere to replace my house. I am very old, in my 80s, so I thought the place where we are living at the moment, is our home. But I can't find anything to replace the house that is near the station and the grocery shops. There were a few houses on the market, but they are too expensive. There is no way to get one of those houses, with the money I get from our house."

"They're going to acquisition it, they're going to buy it by force."

The situation is "very stressful. Particularly for aged people like me." He describes the search for a replacement as a "nightmare" that may have "shortened my life expectancy".

He laughed when asked if WestConnex had been helpful. "No. Just one way instructions."

"WestConnex is not helping to find a new house. It did a valuation and that's it. The amount from WestConnex may be fair, but I can't find anything to replace the house with the money from WestConnex."

I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.

96 year old resident Ray Harrison lives close to what could become a massive construction site for the tunnel exit and ventilation stack. He has been regularly protesting on the streets of Haberfield

22.6 WestConnex GHD report warns of serious risks to residents, especially vulnerable ones

The GHD report did find that the acquisition process could carry ‘significant social risks’ (Appendix M, p. 96)… including ‘inaccessibility of equivalent housing at a comparable

cost…relocation health risks…[and] altered access to social infrastructure' as well as potential housing stress due to higher rent or house costs. It is 'expected that the majority of owner-occupiers would aim to relocate within the local area', and effects may be compounded by the timeframe of just 9 months for some households to be relocated, market volatility and reduced housing stock available to relocate into (Appendix M, p. 68).

It also noted that the "stress and anxiety" could lead to "impacts on health, well-being and quality of life, which have been worsened by the uncertainty and the changing footprint of the project with some dwellings originally to be acquired now not, and some originally not impacted now required for the project (Appendix M, p. 68)."

It found that the impacts would likely impact vulnerable households but that even less vulnerable households would be affected as "land acquisition would increase property demand in the local area with some households with only nine months to identify alternate properties". (Actually it is less than nine months for Kevin as some property owners have been told they must be out of their houses by April next year.)

"Overall it is anticipated that the social impacts of relocating for many of the directly affected households would be **major short-term impacts**. In some cases, where households are unable to relocate locally, the social impact may involve an extended recovery time to re-establish social networks and daily routines for work, study and recreation. Alternatively, where households need to incur higher levels of debt in order to remain in the local area, increased mortgage or rental stress may result in greater and longer term social impacts."

Short term impacts are defined as between 1 and 3 years. (Appendix M p. 23). Major impacts are substantial ones that the report states could be mitigated, although it does not explain how this might happen after residents are forced out, which is in the process of happening at the moment. So for older people this could be very serious. The stress and forced relocation could shorten their lives, particularly for those who do not have strong family support networks.

Given the lack of any in depth or direct investigation by GHD, it is disturbing that the consultant repeats and appears to accept the word of WestConnex at face value. On page 87, GDA reports:

WDA is also providing an independent service to vulnerable households (e.g. elderly, those suffering an illness) to help assist with their relocation. This service aims to provide assistance with tasks such as finding a new property (either to rent or purchase), arranging removalists, disconnection of services (electricity, gas etc.), attending appointments with solicitors and other tasks associated with relocating. With nine per cent of people in the region over the age of 70 years and 4.6 per cent
needing assistance for their daily needs, this support will be imperative to mitigating relocation disruption.

On the basis of this statement, the report concludes that "minimising dislocation of affected households from their existing socio-economic networks is a key consideration in avoiding social risks to those affected by property acquisition."

22.7 GHD report out of touch with residents' experiences

While the WDA statement quoted in the GHD report does represent the official version of what is happening, it doesn't represent what residents would have told the consultant had they been asked. The problem is that with five months to go until they empty their homes and move to new houses, residents such as Kevin claim that support is simply not there.

WestConnex Action Group Haberfield spokesperson Sharon Laura told the People's EIS, "I hope those who are currently in the process of trying to negotiate just terms for the loss of their homes are not panicked into accepting what is first on offer by WestConnex/RMS." She recommended that residents negotiate hard like Aurelia to get the best deal – and not leave their current home until they have found a suitable replacement for the home and community they are losing.

"In Haberfield and Ashfield, there are owners and tenants, who have received their PANs (notice to settle on agreed price, either as an owner or tenant), and who are being hassled to leave their homes before Christmas. Many have no idea of where they will re-locate. Some, who may have been offered a 'good price', say that even with this, they cannot afford to purchase or rent back in Haberfield or Ashfield. So much for 'just compensation' and a just process of acquisition. Money provides no 'just compensation', when a person or family is forced out of their community against their will, and in an such and untimely manner. Why should anyone leave until they are ready and have got something decent to move into?"

The WestConnex Action Group rejected Baird's assurances that the government is doing all it can to support people and called for a halt to forced acquisitions.

Aurelia's 96 year old neighbour Richard reading EcoTransit Sydney newspaper

There are also serious impacts for residents living in aged care facilities and for tenants who may find it impossible to find or afford comparable accommodation in their home suburb

I object to the WestConnex project in its entirety, as the human impact is not an acceptable standard – particularly when it is impacting up to one million people.

For many, working to own your own home is an important part of life in Sydney, although it is increasingly unlikely for younger residents due to rising house prices. People work hard to meet

expectations. The least they expect is that when it comes to the ownership of their home, they will be treated fairly.

The picture emerging if far from what Premier Mike Baird called "doing everything we can in terms of compensation, looking after them, provide provision for a new home" or the low key distanced tone of the Westconnex GHD Social Impact study

But you don't have to be old to be severely affected by the threat of losing your home for less than its value, especially when you call Westconnex's so called free counselling service and they don't ring back.

22.8 The is the story of Kim Sun who home at 21 Young Street will be smashed for Westconnex:

For the past few months, Kim Sun has spent almost every weekend attending auctions and open home inspections in and around North Strathfield. He is desperate and stressed as house prices are way above what he can afford.

The thing is, Kim and his wife already own a lovely home debt free in North Strathfield, which they have renovated bit by bit since buying it in 2006. They've added insulation, solar power and a water tank as they expected to stay in it a lot longer. Their six year old son rides his scooter with his dad to the local school and his grandmother lives a 5 minutes drive away in same suburb.

But in November 2013, Kim received a letter from the WestConnex Delivery Authority (WDA), informing him his house was to be acquired to make way for the motorway. It was the first he'd ever heard of the WestConnex. The family must now vacate by March next year, but Kim says WestConnex will only buy their house at nearly $200,000 less than market value.

"The price Roads and Maritime Services offer means we can only buy a home very substandard to the one we are living in. And time is running out. " says Kim.

"It's not right. It should be market value. That's what they say they are offering, and it's not. They are not doing the right thing by people. Considering the project is going to cost $15.4 billion, and they need our place, and they are stressing us out, why put on that extra pressure of offering below market value."

Kim Sun's has been forced to sell his house to RMS at below market value

“It’s a difficult situation too for me because my wife doesn’t work, she looks after my son and the house. I am the only one working, so it makes it a bit difficult having to borrow extra money to find a place, so we can stay within the area, with what they are offering.”

Kim says it’s the same for everybody on their street: “We all seem to have a problem with getting the market value.”

He knows others who have had to move to the Central Coast after their house was acquired, but that’s not an option of the Sun family. “I don’t want to change schools for my son, he likes it there, and mum is close by. I don’t want to go somewhere else,” says Kim, who catches a train from North Strathfield station or Strathfield station into work at Town Hall. “We were hoping to stay here a long time, which is why we set the house up comfortably.”

The past two years of negotiations and uncertainty have taken their toll. Kim is struggling with stress and is on antidepressants. It’s a situation made worse by a lack of communication from the WDA. “I’ve tried to call WestConnex myself, but they don’t return calls,” says Kim, who has kept a log of these calls, having been assigned a ‘job number’ for each. He feels “extremely disapointed and stressed” with the way WDA has treated his family.

In July this year Kim called WestConnex wanting to know by when exactly the house had to be emptied, and also asked about accessing the free councelling service on offer. His call was never returned.

A young family, work and an ailing mother already make for a busy life, and Kim says the last thing he needed on top of it all is to be "kicked out of my home in such a short space of time now".

Asked by the People's M4EIS what he thought of Premier Baird's comment about needing to make provision for the majority, Kim says: " If I was losing my house to public transport I'd probably feel less hurt by it. I don't think the WestConnex is going to solve our problems. For me public transport would be the way to go first. And I thought 'market value' was market value. I don't see why we have to negotiate so hard with them."

I object to the WestConnex Project in its entirety, as the treatment of residents is an unacceptable. It is un-Australian.

22.9 Snippets from 'American Way' interview with Jessie J (*The Voice*) about Sydney

Speaking of adventure, Jessie says her newest discovery is an area called Newtown — best described as being the Sydney version of what Brooklyn is to Manhattan. Located two train stops from the city and bordered by the sprawling campus of The University of Sydney, the neighborhood is a little alternative with a touch of hipster chic and vintage cool thrown in for good measure.

One of her recommendations is in the historic Rocks area abutting the harbor at the northern end of the Central Business District. "The fact that you've got the Sydney Harbour Bridge, the Opera House and some great bars and restaurants all in the same area makes it very unique. There's nowhere else in the world you could be in that moment."

If she had to name one place in the city that is a nonnegotiable, it lies just across the harbor under the northern pylon of the Bridge.

"Luna Park is an old-fashioned amusement fair that's lit up beautifully at night," she says. "I feel a bit bad talking about it because it's a place the locals adore and it's got beautiful heritage architecture with a view across the water that is just beautiful. There is also a great live-music venue there, which I've actually played, so do a bit of research beforehand and you can actually catch a gig while you're there."

Ask any Sydneysider how they feel about this icon, and they'll usually tell you it shines all the brighter the longer you look at it. Much like Jessie J herself

I object to WestConnex in its entirety, as it will destroy heritage areas that are of interest to tourists, not to mention, of national interest. You can't just destroy what is the essence of Sydney.

23 Where does democracy fit in?

Prime Minister Malcolm Turnbull has created a new ministry for cities and the built environment. Announcing his decision last month, he said:

"Liveable, vibrant cities are absolutely critical to our prosperity. (They are) where the bulk of our economic growth can be found … (and they are) economic assets. (M)aking sure that Australia is a wonderful place to live in, that our cities and indeed our regional centres are wonderful places to live, is an absolutely key priority of every level of government. Because the most valuable capital in the world today is not financial capital … (it's) human capital"

The inner west and inner south is a wonderful center which is mostly people for walking – nearly 90% of people are walking at any one time, 80% of people get there by public transport. A metropolitan strategy based on walkability and public transport is exciting.

WestConnex is out of kilter. It is hard to believe that the NSW Government would have really wanted this in their array of strategic plans (it certainly was not part of the NSW Transport Master Plan 2012). Obviously – it was dropped from above aka (worst ever) PM Tony Abbott.

We need to rethink how to plan to tackle Sydney's congestion issues. Fifteen billion dollars (plus) is a very sizeable amount of money – let's put it into that altenative future, because that's where the competitive future is for Sydney, and it will give us a much more liveable city.

Let's get serious about providing a better future for Sydney and throw wasteCONnex out.

I reject WestConnex in entirety, as it has not been through the proper planning strategy. If proper protocols had been followed, such a pathetic project would not have seen the light of day.

The People of NSW have been deceived and mislead by the proponents of the WestConnex motorway.

24 Conclusion

I consider it extraordinary that the WestConnex project has progressed to the point of issuing contracts and PAN notices to residents – without following the required dNSW and Federal public money u Sw Connex project has progressed this far. A project that has not followed due project procedures. A project that has been shrouded in secrecy and unable to provide evidence that it is the right project for Sydney.

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.

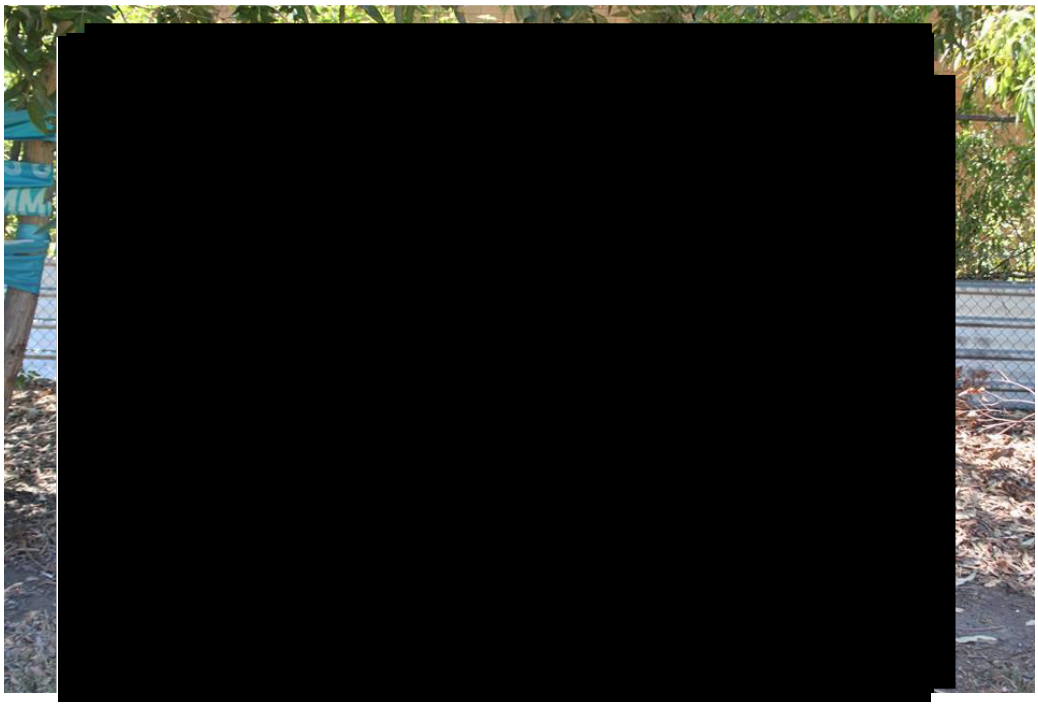
I further object to WestConnex community liaison staff **concealing information from residents.** The KGR M5 Interchange EIS stated that noise walls will be reinstated in their current form.

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.**

I understand that the Dept of Planning is under enormous pressure to approve the WestConnex project. Given the enormous community backlash and negative press to this motor-way. Given that WestConnex are really struggling with this project. The most sensible thing to do is to reject the WestConnex in its entirety and put the sad dog down.

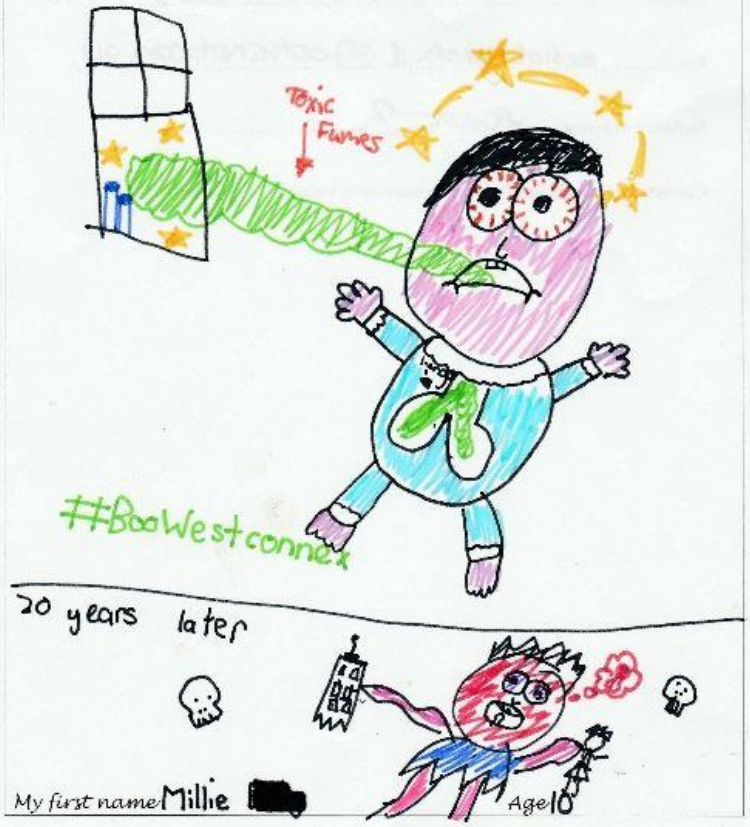
Then lets set about properly engaging the people, and getting Sydney moving with great public transport.

25 Children's voices from Kingsgrove.



Secretary
NSW Department of Planning and Environment
GPO Box 39, Sydney NSW 2001
Submission to DP & E Project Number: SSI-id_6788 WestConnex New M5

I object to the westconnex project because



20 years later

My first name Millie [redacted] Age 10

Mum or Dad to sign the back of this letter

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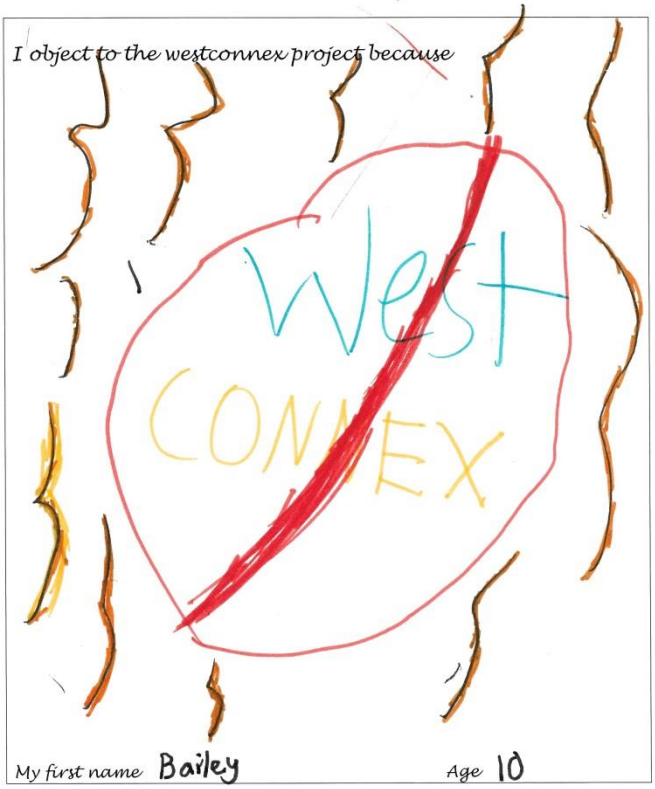

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Mum or Dad to sign the back of this letter

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[redacted]

Name: Tom Freeman
[redacted]

Address:
[redacted]

Strawberry Hills, NSW
2016

Content:
I think that the site could be used more creatively such as creating an inland lake.

The money should be spent on improving Public Transport as Sydney cannot accommodate more cars.

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