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Submission to Application SSI-9737 Sydney Gateway road project.

I object to the NSW Department of Planning's approving the Sydney Gateway Road Project on a number of grounds –

the business case does not take climate change into account as a risk nor does it adequately assess alternatives to a massive **road** project;

it will increase greenhouse gas (GHGs) emissions both in construction and in operation;

it will increase the air pollution in neighbourhoods already subject to poor air quality;

it will increase the urban heat island effect with further built development and loss of vegetation;

it will subject communities to a further three years of noise, offensive odours, dust, air pollution, more heavy traffic on local roads, construction disruption, night work, and stress which our St Peters community has endured for the last three years.

I object to the fact that again, an EIS exhibition period ends close to national holidays, ie, today, the week before Christmas when people really cannot spare the time to digest the EIS and prepare submissions. This is manifestly unfair dealing and makes a joke of the EIS process.

Business case summary failings

The business case summary asserts this project will deliver time savings if journeys from the St Peters Interchange (SPI) to Sydney Airport and to Port Botany as the principal justification for the 3 years of disruption and \$1.6 billion cost:

“ during the AM peak in year 2036, travel time savings will average 15 minutes on journeys between the St Peters Interchange and Terminals 2/3 and 9 minutes to the sea port.” (p.9)

55 per cent of the benefits result from transport improvements can be attributable to travel time savings (p.10).

It is judged necessary to enable an anticipated doubling of container freight transport through Port Botany and substantial increases in air passenger numbers and freight volumes through Sydney Airport.

The premise for these increases include the following:

- a) Port Botany remains the principal sea freight dock;
- b) air travel and air freight will increase through Sydney Airport;
- c) duplicating the existing single freight rail line would not be sufficient to deal with the anticipated growth in freight.

These premises ignore a number of factors, including

- 1) opening up Newcastle port to container freight movement, once coal exports are ended;
- 2) the impact of the Western Sydney Airport opening in 2026 on freight and passenger movement;

- 3) the potential for carbon emission reduction restraints on trade, including on air travel and transport of goods with high carbon emission costs.

The business case assumes business growth will return to the trends of previous decades. This seems optimistic given the global economy appears to have moved into a lower growth pattern and the Australian economy, like most of the developed countries, is caught in a low growth cycle. It does not take into account the trend to protectionism and to bilateral trade agreements which will affect the volumes of trade. It does not take into account the impact of climate change, both the effect of attempts to curb carbon emissions and mitigate climate change's effects.

Climate change is not identified as a business risk in the business case summary.

NSW is in the midst of the worst drought in the state's recorded history, compounded by the historically unprecedented scale of bushfire. Both will adversely affect actual GDP and growth rates of the state. We can expect lower economic activity – eg, a drop in agricultural produce exports and a decline in tourism. There will be significant actual costs - loss of housing and other property, loss of income in regional centres, health costs from air pollution and heat, infrastructure upgrades and management plus associated costs to deal with limited water supplies. Does anyone think that the present catastrophic circumstances are a one-off, unlikely to be repeated in the next 16 years? Why wouldn't one think there will be worse scenarios in the future with significant impacts on trade and economic activity?

As greenhouse gas emissions continue to rise, we cannot ignore that the “new normal” for NSW is longer and more severe droughts and longer and more severe bushfire seasons, with the impacts identified continuing. The most obvious effects of unmitigated climate change will be more frequent weather disasters, here and globally, which will have an adverse effect on international trade. It is rash to assume a “business as usual” basis and optimistic to predict a return to earlier trends for assessing the need to expand freight transport infrastructure.

Impact of project on neighbourhood

Odours

I see that offensive odours escaping from the former Tempe landfill has been identified as a risk during construction. I am frankly relieved to see the conditions identified by the EIS, presumably in response to the EPA's court action, criticism and penalties imposed on the M5 contractors CPB after the horrendous experience of the St Peters neighbourhood with the disgusting stench emanating from SPI 9 in 2017 for several months.

I note that a method for identifying potential sources and dealing with them plus an odour management strategy should be developed in advance of construction. Why not make it mandatory?

The scenarios and discussion in TWP 17 imply that the odours will be noticed and reported by “sensitive receptors” around the old Tempe site, not on the site itself. Likewise the workforce is not identified as receptors. I ask why not?

It is impossible to tell from the technical description in the TWP 17, eg the “2 OU assessment criterion”, whether the allowable volume of offensive odours are reasonable or not. If it is detectable, particularly from some distance from the site then it is exceeding a reasonable level.

The “Representative sensitive receptor locations” (Table 4-1, p. 26) do not include the Tempe High School nor the St Peters School and childcare centre. While these two sites are on the edge of the Tempe landfill ‘s surrounds, the 2017 experience was that the prevailing on-coast winds pushed the stink from the SPI across Sydney Park, up to Sydney Park Rd, to the end of King St near St Peters Station and across the Princes Highway and Unwins Bridge Rd. It made life for residents a misery for months and kept the community’s children out of the parks and play grounds and away from school on the worse days.

It is recommended that as soon as the workers on site identify an odour, work ceases until the source is identified and dealt with. In addition, if the odour is identified on one of the receptor sites and reported to the contractors and to the EPA, that work on the most likely source be stopped and the offensive odour dealt with. In the case of the 2017 Great St Peters Stench we locals could not believe that the EPA could not force work to shut down to deal with the matter.

It is strongly recommended that the State Significant Infrastructure provision of EPA Act (S.5.12) be amended to empower the EPA to stop work where an odour exceeding an allowable level is detected until the source is identified and dealt with.

Regarding prevention, surely the EIS should recommend that leachate found on the Tempe landfill site should be pumped out with care as soon as it is found to prevent odours escaping. It should be treated as any other contaminant found on site. The gases from the old land fill, the contaminated soil as well as the odour are health hazards from which the workers on site and the surrounding residents and other workforces should be protected. Since the discussion in table 3.4 “Assume[s] maximum five disturbed waste locations at any one time (for waste movement)” it seems that instead of dealing with this site as one with significant hazards which should be handled with care, the business as usual, bulldozer approach will be taken rather than caution for the sake of the workers and others potentially at risk.

Air pollution

The EIS effectively admits that there will be more air pollution from the construction phase of the project and in all likelihood when the roads are operating -

“12.20 Sydney Gateway Road Project

The modelled spatial changes in air quality as a result of the project are quite complex, reflecting the complex changes in traffic on the network. Key outcomes are predicted to include:

- Marked increases in pollutant concentrations on the new roads associated with the project (Terminal 1 connection, St Peters interchange connection, and the Qantas Drive upgrade and extension)
- Increases in pollutant concentrations on several existing roads (Qantas Drive, Joyce Drive, General Holmes Drive, and Airport Drive near Terminal 1) due to increased traffic”.
- Decreases in pollutant concentrations along several existing roads (M5 East, Southern Cross Drive, Botany Road, and Canal Road) due to reductions in traffic of between 8 per cent and 28 per cent on these roads.

The scenarios with and without the project will not meet national goals for daily averages of PM 10. This represents an absolute failure of NSW transport planning. The air around the airport where many people work will become worse.

“The highest predicted concentration at any receptor in any scenario was 13.6 µg/m3.” It is not clear exactly where this is. We note that the PM 2.5 annual mean is predicted to get worse in up to 44 % of receptors depending on the scenario. This is very disturbing given the high levels currently observed. The government should be working on solutions that improve the

deteriorating air quality rather than planning in ways that worsen the situation for some and improve it slightly for others, while still leaving them above national goals.

The Ecotech P/L monitoring over the past several months has shown a number of exceedances above the national standard already around Campbell St and in Arncliffe. The EIS for this project suggest that air pollution from vehicle traffic will be worse, on top of a similar prediction in the EIS for the New M5 in operation for intersections in our St Peters neighbourhood. I ask what are we, the residents in St Peters? Collateral damage?

Particulate pollution from vehicle exhaust, especially diesel, is an identified carcinogen. The human health TWP 15 also notes:

“– The construction phase of works has the greatest potential for negative impacts as a result of traffic changes during construction, property acquisitions, visual changes, loss of some green space and existing recreation facilities and changes in access/cohesion of local areas. These may result in increased levels of stress and anxiety within the community. In many cases, the impacts identified are either **temporary (associated with construction only)** and/or mitigation/management measures have been identified to minimise the impacts on the community. (TWP15 11.1).

These construction impacts are not short term. In the case of St Peters, the impacts have already been felt for several years. Assuming the predictions are correct, the short and long term environmental future for the many thousands of residents living around the airport is not as healthy as Sydney’s residents should be able to expect.

I fear in our neighbourhood we cannot look forward to lower levels of pollution after the construction work finishes. It is appalling that the NSW government is persisting with mega road projects instead of looking for alternatives for transport (people and freight) which are less polluting and less damaging to people’s health.

Climate Change and its impacts.

Assessing the impact of this project in both the construction and operations phase the EIS admits that construction could well have adverse impacts, in greenhouse gas (GHGs) emissions, heat and dust (see p.26.2 of TWP26).

As found in the EISs for the 3 stages of WestConnex, the “savings” of vehicle emissions is based entirely on average higher speeds for the heavy vehicles promoting better fuel efficiency. We note that adopting higher fuel efficiency and emission standards for vehicles has been resisted consistently by federal and state governments for the past decade. Consequently the statement, “future improvements in fuel efficiency and vehicle type **may** further reduce greenhouse gas emissions throughout the transport system in NSW” (p.26.9) strikes me as a pious hope.

The project will itself add to carbon emissions, from the concrete structures and from the anticipated, increased vehicle traffic. Since the whole point of the project is to accommodate the increasing volumes of road traffic – instead of looking for alternatives – it is not possible to assert on the basis of traffic speeds alone that this will reduce emissions.

The basis for anticipating that GHGs and urban heat will be reduced or mitigated lies in the “detailed design stage”, a strategy familiar from the EISs for the 3 stages of WestConnex. The Business Case Summary refers to “environmental savings” without any supporting detail. It is impossible not to be quite cynical about claims of reduction in emissions.

24 hectares of vegetation will be lost. Intensified development is anticipated and factored in for the suburb of Mascot with an estimated four-fold increase in number of dwellings.

While the increased morbidity may be statistically negligible (according to TWP15, and the construction phase is “temporary” (3 years), it will follow 4 years of demolition and construction disruption (WestConnex and the Sydney Metro) and negative impacts in the St Peters, Sydenham and Tempe neighbourhoods in particular and more generally in the vicinity. For children in these communities this represents a large span of their lives, and the stress and ill health impacts will affect them for these years in succession. It beggars belief this will have no lasting impact. And of course this has affected the health of the elderly and people with existing respiratory and cardiac impairments.

In the absence of serious carbon emission reduction, climate change will continue for the foreseeable future and will exacerbate the impact of the urban heat with no new vegetation able to mitigate this impact for a decade at least. The additional GHGs and PM pollution and heat impact this project will cause at a minimum in the construction phase should not be discounted. The experience of my neighbourhood with WestConnex’s impact is that:

- we have lost a key local refuge from the heat in summer, the south-east, cool corner of Sydney Park;
- we have lost 100s of mature trees, in our streets and pocket parks;
- we endured higher levels of pollution; and
- now in the hottest and driest spring in NSW history we suffer from the heat and light reflected from wide expanses of the new hard, concrete road and footpath surfaces with nothing to mitigate it.

The EIS for this project, using what are questionable numbers and a limited technical assessment of the climate impact continues to discount the human impact locally as well as the greater impact of its emissions. Without a dramatic change in building standards to reduce heat and emissions, without a substantial percentage change in the vehicle fleet from petrol and diesel vehicles to electric vehicles, anticipating the addition of more commercial, industrial, freight and storage facilities coupled with a large surface road project it is impossible to believe the urban heat island effect and the amount of greenhouse gas emissions will not increase.

It is extraordinary that the state government has proposed another mega-road project to enable the movement of even higher volumes of vehicle traffic emitting more GHGs. Why hasn’t the option of acquiring back the Airport Line and providing cheap transport to reduce road traffic in and out of the airport? Lifting the artificial restraint on the Newcastle Port to increase the volume of container freight going through it would take the pressure off Port Botany and also reduce need for trucks to travel north of Sydney.

I am opposed to this project because it seriously fails to consider alternatives that would have less impact on the community, improve air quality in Sydney and be more appropriate in a time of global warming.

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