WestConnex Stage 3 EIS (M4/M5 Link)

Submission by Alexandria Residents' Action Group (ARAG)

Summary

ARAG strongly objects to the WestConnex M4-M5 Link for the following reasons:

- There is a lack of strategic justification for the project. No feasible alternatives have been developed or assessed.
- It fails to meet the primary objectives of providing a direct motorway connection between Western Sydney and Sydney Airport and Port.
- The EIS does not adequately account for impacts on health and air quality. The EIS identifies an additional 5 unfiltered ventilation stacks to be constructed in inner Sydney – including our suburbs. In addition, local surface roads will be widened and traffic volumes will increase.
- There is no alignment with the NSW Government's priorities and policies for an integrated transport solution to Sydney's growth challenges
- There are severe impacts on the community of Alexandria and our neighbouring suburbs – now and for future generations
- The EIS forecasts that the Project will have deleterious effects on bus travel time and reliability.

Alexandria is already subjected to high levels of congestion due to rapid development and increases in population. The EIS shows that WestConnex is no solution to this – on the contrary, it will only worsen it. Moreover, if Alexandria and neighbouring suburbs are congested, the entire project will fail, as this is the end-point for the M4-M5 link.

Strategic Alternatives

The Secretary's Environmental Assessment Requirements (SEARS) require analysis of feasible alternatives to the project. But no feasible alternatives have been developed and no objective, evidence-based analysis of alternatives has been undertaken.

- Section 4.4 of the EIS purports to cover *Strategic Alternatives*, but does little more than offer a discussion of why an alternative was not pursued.
- Better use of existing road infrastructure has not been analysed as a feasible alternative. The EIS only refers to existing RMS programs.
- At a minimum, the EIS should carry out transport modelling and economic analysis to assess: improvements to the existing arterial road network (Strategic Alternative 1), alternative transport modes (Strategic Alternative 2) and travel demand management (Strategic Alternative 3)
- Given the disastrous record of similar tollway projects in the past, there should also be a discussion as to how modelling and forecasting practices have been improved
- The consideration of alternatives should also incorporate best practices from other leading global cities

Community complaints during construction

The EIS states that a Construction Traffic and Access Management Plan (CTAMP) "*would be developed in consultation with local Councils and stakeholders associated with public facilities adjacent to project site*". However, the record to date is that communities – including residents in Alexandria – have not had their complaints fairly dealt with. When issues are raised, Sydney Motorway Corporation and Roads and Maritime Services each deny responsibility and blame each other for a lack of action. Moreover, undertakings which these organisations enter into are not necessarily honoured. As a result the community has no effective avenue for complaints to be resolved. A better system needs to be erected for this project to safeguard communities and preserve our democratic rights. This has to be guaranteed before project approval.

Traffic and transport modelling

There is no statement on the level of accuracy and reliability of the traffic modelling process. This is a major deficiency and is contrary to the SEARS.

Properly evaluated traffic modelling is essential due to overoptimistic traffic predictions in other recent toll road projects such as the Cross City Tunnel and Lane Cove Tunnel. Reliance on the strategic traffic model (WTRM) alone amounts to maladministration. The model assumes that routes in the network have the capacity to carry the forecast traffic. However, the heavily congested roads in inner city areas such as Alexandria do not. The WTRM results should therefore have been accompanied by a mesoscopic model. As is, it relies on implausible traffic volumes that exceed the physical capacity of the road links and intersections at numerous key locations.

The modelling process incorporates a non-standard definition of induced traffic (p.45 of Appendix H), as well as a very low percentage of induced demand (0.3%) in light of actual

experience. The Value of Travel Time is unpublished. All these assumptions need to be publicly released and subjected to rigorous independent assessment.

Sydney Gateway/Sydney Airport

The EIS states that the project will improve connection to the Sydney Airport and Port Botany. It will not. Without the Sydney Gateway, which is not part of this proposal, the traffic figures in the EIS show that network performance around the Sydney Interchange will either not improve significantly or even actually worsen. The M4-M5 link is reliant on a road which is unfunded and whose route has not been finalised.

Boundaries of the study area

The boundaries of the areas of operational modelling are too narrow to fully assess the Project's impacts on Alexandria, as well as key strategic centres such as the Sydney Central Business District. The St Peters operational model (Fig 8-6) does not, for example, cover the full length of Mitchell Rd or Euston Rd, and does not reach Fountain St or McEvoy St. This means that the Alexandria community is not able to judge the effects of the project on local streets. Impacts on local streets need to be modelled as part of the EIS.

Projected traffic volumes

The St Peters / Sydney Park Interchange will overwhelm the Mascot road network. As a result traffic levels were reduced to fit the modelling.

In order to make the model work, traffic that exceeds the free flow capacity of the network was reassigned to hours outside of the peak – i.e. the model assumes people shift the time they travel. However, the potential of shifting journey times to reduce overall traffic demand is not considered.

The modelling has thousands of unreleased cars at key locations; i.e. in reality those unreleased vehicles would result in vehicle queues and/or network failure.

The key intersection performance tables in App H (p.258) demonstrate that many intersections will either worsen (at the worst case scenario of LOS F) or remain unchanged particularly in 2033, including the following intersections:

- Princes Highway/Canal Road
- Princes Highway/Railway Road
- Unwins Bridge Road/Campbell Street
- Campbell Road/Bourke Road
- Princes Highway/Campbell Street

Volumes on the main links cannot be as high as what is claimed in the EIS. It is physically untenable.

The modelling shows the motorway exceeds reasonable operating limits in the peak in less than ten years.

The congestion in the St Peters network will also make the local bus network dysfunctional. Bus schedules in this area are already unreliable due to congestion; the EIS shows this will only worsen.

Impacts on surrounding road network and required upgrades not provided

The EIS notes that an 'Operational Traffic Performance Review' will be undertaken at 12 months and five years after the M4-M5 Link is open to consider the need for "post-opening mitigation measures" (Page 223, Chapter 9.8, Appendix H).

We object to this approach as it is contrary to the requirements of the EIS process.

The nature of these "post-opening mitigation measures" are not specified and their impacts could be significant, including: intersection and road widening (and associated property loss), banning parking in local centres, removal of trees, footpaths and cycling facilities. The residents of Alexandria have a reasonable expectation to understand whether such impacts form part of the project and they should be detailed in the EIS. They should not be left to a "wait and see" approach. Not only a proper analysis of demand, but also of traffic dispersion should be provided for connecting roads up to three kilometres from every exit and entry portal and the capacity of those roads analysed.

The cost of any such "network integration" works should very clearly be attributed to the project cost, and should not impact on the available RMS budget for the State road network normal maintenance and improvement budget.

The Secretary's Environmental Assessment Requirements (SEARs) for the EIS (Page 8-2 – Table 8-1) require the Applicant to consider the operational transport impact of toll avoidance, however information provided on toll avoidance in Chapter 9.8 (Page 222) of Appendix H is limited to four short paragraphs.

Air quality

Scientists have found that there is no safe level of air pollution. This is not only a personal tragedy for those directly affected, but also represents an increased burden on our health system. A thorough cost-benefit analysis that takes into account the health effects due to increased exposure is required.

Concentrations of some pollutants $PM_{2.5}$ and PM_{10} are already near the current standard and in excess of proposed standards (p9-81, p9-93). These particulates are a classified carcinogen and are known to have critical, and at times fatal, consequences if elevated. People living within 500 metres of heavily affected areas have demonstrably shorter lives.

The EIS states that the impact on regional air quality is minimal and thus concludes that the project's impact on ozone is negligible. Ozone is a major pollutant, affecting Western Sydney as well. Previous environment departments have spoken about the need for an eight-hour standard concentration and goal for ozone (DECCEW, 2010, State of Knowledge: Ozone). OEH needs to provide information about the value of this standard and on the impact of new motorways on that level.

The EIS should not be approved until an independent scientifically qualified reviewer has analysed the stated air quality outcomes and identified any deficits

The St Peters interchange is of particular concern to the residents of Alexandria. St Peters will have large volumes of vehicles accelerating and decelerating as they enter and exit tunnels and access roads, next to proposed playing fields. This is complicated by emissions stacks located in the Interchange – whereby pollution from the interchange is supercharged by the emissions from the stacks.

Land use and property

Increased traffic on local roads will decrease residential amenity and decrease the potential for new higher density housing. This will affect numerous streets, with particularly major impacts on streets in Alexandria: Euston Road, McEvoy, Botany, Wyndham Sts.

Urban design and amenity

The St Peters Active Recreation Area is of no value to the community. Sited around a ten-storey high motorway and in proximity to pollution stacks, it does not increase the amenity of our local area.

Increased traffic cannot be accommodated in our area, or in Central Sydney. It will further impede pedestrian movement and comfort and undermine easy access to public transport and reduce access to jobs over large areas of the city.

Carbon pollution

The operational Green House Gas (GHG) assessment is based on the WestConnex Road Traffic Model version 2.3 (WRTM v2.3).This model has major flaws and the unreliable outputs of the model put into question the GHG assessment.

The assessment states that there will be a net increase in GHG emissions in 2023 under the 'with project' scenario, however under the 2023 'cumulative' scenario, there will be a net decrease in emissions (page 22-15). However, as the 'cumulative' scenario includes the Sydney Gateway and Western Harbor Tunnel projects, which are not yet confirmed to proceed, the 'with project' scenario should be considered as a likely outcome – which would see an increase in emissions. Both scenarios for 2033 show a reduction in emissions vs the 'do minimum' scenario. This is likely to rely on 'free-flow' conditions for the Project for most of the day. Should this not occur, the modelled outcomes could be significantly different.

Emissions were not modelled beyond 2033. This is an omission, as the contractual life of the project is significantly longer, until 2060. The EIS states, on page 22-15, that 'it is expected that savings in emissions from improved road performance would reduce over time as traffic volumes increase'. Therefore, the longer-term outcome of the project is likely to be an increase in GHG emissions

Targets for renewable energy and carbon offsets are not aligned with NSW government policy. (Table 22-8)

Targets for renewable energy and offsets are unclear.