

INQUIRY INTO IMPACT OF THE WESTCONNEX PROJECT

Organisation: Rozelle Against WestConnex

Date Received: 30 August 2018



Rozelle Against WestConnex

Parliamentary Inquiry Submission



1 Introduction

1.1 Purpose of this document

RAW (Rozelle Against WestConnex) has developed this submission to the **Parliamentary Inquiry into WestConnex** with focus on the M4-M5 Link, also known as Stages 3A and 3 B of WestConnex. Key aspects of the Project have been selected and referred to with particular reference to the terms of the Parliamentary Inquiry.

In this submission, 'the Project' refers to the WestConnex M4-M5 Link, the Iron Cove Tunnel and the Rozelle Interchange.

1.2 Executive Summary

- It is RAW's contention that the business case for the WestConnex project, including the cost-benefits ratio, is disturbingly inaccurate. The cost of the WestConnex project has been seriously underestimated and its forecast benefits overstated. This assessment is justified in considerable detail throughout the RAW submission and draws on data provided by SGS Economics and Planning, Searle CG and Legacy as well as from other sources.
- The governance and structure of the WestConnex project including the relationship between Sydney Motorway Corporation, Roads and Maritime Services, the Treasury and its shareholding Ministers does need to be examined in detail. Substantial contributions made to both political parties by organisations in the business of providing infrastructure also need to be scrutinised in the light of the subsequent awarding of tenders for State Significant Infrastructure projects.
- Allegations of corruption levelled against key players such as CIMIC and AECOM in other parts of the world have led to these companies being banned from tendering while these charges are being investigated. Good governance suggests that the same approach should also have been applied here.
- Inaccurate and overstated usage figures supplied by AECOM on at least 3 other tollroad projects here have not been met, resulting in the shortfall being made up from the public purse. AECOM's figures for The Sydney Harbour Tunnel has cost NSW taxpayers over \$1 billion during the time of its operation.
- The compulsory acquisition of property for the project has caused considerable dislocation and distress. RAW is aware of a number of owners of compulsorily acquired properties who were paid as little as 60% of the market value of their homes and who were subsequently forced to move well away from the area as they couldn't afford to buy back in.
- The breakdown in community ties is palpable both in terms of community, social and school networks. One resident contesting eviction was actually jailed for a week for refusing to vacate his family home.
- The recommendations of the Audit Office of New South Wales and the Australian National Audit Office in regards to WestConnex both suggest that the project should not proceed 'until the business cases are thoroughly revisited for Stages 2 and 3.'
- Clearly the project fails to meet the original goals of the project as articulated in 2012. These include connectivity to the ports and the airport. On this criteria alone the project is a failure.

- The relationship between WestConnex and other toll road projects including the Sydney Gateway, Western Harbour Tunnel, F6 and Beaches Link is apparent. Clearly it is one big interconnected project and the Sydney community recognises it as such.
- The separate staging of each of these components, the use of private companies to hide detail from the public, the sham of the community information sessions and the blatant disregard of the 13,000 objections to Stage 3 alone, demonstrates that the Government is acutely aware that the public genuinely believes that WestConnex and similar tolled freeways aren't a solution and that a world class public transport system is desperately needed here in Sydney.
- The sale of the Sydney Motorway Corporation may not represent a good investment for NSW taxpayers. Any sale that guarantees to reimburse the operators from the public purse for less than projected usage, is clearly contrary to the public interest. Any contract, such as the one for the Eastern Distributor, that precludes the Government, or any operator, from providing an alternate or competing transport corridor, is also definitely not in the public interest.
- Because of the secrecy surrounding the Project it is impossible to ascertain the extent of taxpayer liability.
- With tolls to increase by 4% annually many will seek to avoid the tollways, further driving down usage and increasing the shortfall.
- In Los Angeles, a maze of urban freeways has clearly demonstrated that freeways actually create traffic problems, not solve them. LA's 8 hours of bumper to bumper traffic in daily peak periods has finally convinced legislators to abandon the freeway approach and to invest heavily in public transport.
- Of enormous concern to residents of the Inner West is the blatant refusal by the RMS to filter the proposed exhaust stacks. This decision will cause premature morbidity, ranging from diabetes to cancer. It ignores world's best practice - as road tunnels in Japan, Norway, Spain, Italy, and China are constructed with in tunnel particulate and nitrogen dioxide filtration.
- The 4 proposed stacks in Rozelle will easily emit in excess of 50 tonnes of particulate matter annually, based on RMS figures for the M5 East exhaust stack. The cost to the community in financial terms is impossible to quantify but could easily run into billions.

RAW also attaches our newspaper ***Bottleneck!*** which also forms a part of our submission to the Parliamentary Inquiry, as further evidence of the unsuitability of the Project.

The NSW Government must meet its duty of care.

It has a legal and moral responsibility to enhance the quality of life of its citizens and to protect them from harm.

All Governments are elected to act in the best interests of their citizens.

Failure to knowingly not do so is unconscionable!

Contents

1	Introduction	2
2	Inadequacies of the business case	5
3	Strategic context and Project need.....	8
4	Scope of the Project and its stated aims	9
5	Project and its objectives.....	10
6	Project and transport alternatives	12
7	Project and coordination with local councils	14
8	Traffic and transport modelling	16
9	Air quality claims	19
10	Impact on property and residential amenity	22
11	Promised open space	22
15	Cumulative impact	22
16.	Recommendations	22

This submission was compiled by and on behalf of RAW - Rozelle Against WestConnex.

RAW is a single issue resident group formed specifically to oppose WestConnex. We currently have over 800 members almost all of whom reside either on the Balmain peninsula or in the adjoining suburbs and who share the view that WestConnex is a most regressive project that can only worsen Sydney's traffic chaos and destroy the amenity of the Inner West.

*RAW has conducted public meetings, film screenings, information sessions, rallies, concerts and demonstrations with significant community support. The production and distribution of 60,000 copies of **Bottleneck!**, a 20 page newspaper that is highly critical of WestConnex, has been acclaimed as a major milestone in the campaign as it articulates a cogent argument against this anachronistic and wasteful project.*

RAW affirms that we are a non-political organisation and that no donations whatsoever have been received from any political party. We authorise publication of this document in its entirety.

Lodged with the Parliamentary Inquiry into WestConnex on behalf of RAW:

30th July 2018. 1st draft posted on RAW website.

30th August 2018. Final and submitted draft.

2 Inadequacies of the business case

- It is a fallacy that the M4 and M5 need linking when they are already linked by the M7, A6 and A3. The A3 is the primary eastern link between the two motorways and is shown in the State Road network hierarchy as the M4-M5 Connector.
- The M4-M5 Link enables the expansion of the WestConnex network to include the Western Harbour Tunnel, Beaches Link and M6. These motorway projects, were not part of the WestConnex business case and are not priority projects in any State or Federal roads plan.
- The business case is based on a strategy only document, it does not commit to any design and it therefore does not address any local impacts created by the proposed M4-M5 Link in the manner that an Environmental Impact Statement should. Rather it prepares the pathway for sale of the Sydney Motorways Corporation to the private sector, removing from the responsibility, oversight and control of the Government, the final design, cost and implementation of the M4-M5 Link.
- The Rozelle Interchange also incorporates a significant section of the Western Harbour Tunnel from White Bay to the postal boundary of Balmain. Which means that the business case depends on the construction of the Western Harbour Tunnel.
- To make the sale more attractive, the tunnels between Haberfield and St Peters are being built as Stage 3A, with the Rozelle Interchange as Stage 3B. This is being done to also de-risk the project for the private sector sale. The tunnels can be built using known standards and technology, but the Rozelle interchange, as presently envisaged, may well prove to be unbuildable, with obvious implications for the business case.
- The Project radically understates the true costs by ignoring the cost of interfacing with the existing local road network.
- The WestConnex route has changed significantly over time, even after the initial August 2013 Business Case was approved by the NSW Government but not made public. Therefore an Updated Business Case on an updated concept was published in 2015.

SGS Economics and Planning Report commissioned by the City of Sydney

http://www.cityofsydney.nsw.gov.au/data/assets/pdf_file/0008/251891/Report-SGS-Westconnex-Business-Case-Final-Report-160204.pdf

SGS Economics undertook a detailed assessment and reached the following conclusions:

- Misrepresentation of the Benefit Cost Ratio (BCR) as 1.71 when it was 1.64.
- The Business Case did not identify Stage 3 WestConnex, connecting the M4 to the M5, as a priority for “filling in the missing links in Sydney’s motorway network”.
- Modelling for post-2031 conditions was not undertaken, however benefits were assumed to continue until 2052.
- The transport modelling is likely to have underestimated the impact of extra traffic induced by the additional capacity, which would significantly reduce the BCR.
- The Business Case did not reflect global approaches to congestion management, such as transit investment and demand management.

- The Business Case suggested WestConnex would help renew Parramatta Road by reducing traffic on it, despite the modelling showing that many parts of it would carry more traffic, not less.
- Travel time savings are a key component of the positive BCR. A significant proportion of these supposed benefits arise from travel time savings were within the margin of error of modelling, or would be so small that motorists may not notice them (and therefore would not value them). Research¹ has found that business travellers are more concerned with predictability and reliability of travel times than they are with actual travel time.
- Insufficient justification was provided for the significant travel time savings, and economic benefits, factored into the BCR for business and light commercial vehicles – for instance there was insufficient analysis of origins and destinations of these trips.
- The construction costs appear too conservative – if these increase, the BCR would reduce accordingly.
- As stated earlier the costs of interfacing with the local road network have not been included, leading independent costings by the City of Sydney (SGS) to put the final Stage 3 figure at closer to \$45 billion.
- Other costs were not accounted for, such as reduced amenity on urban development, loss of land for higher value activities, the health costs and the costs of potentially reduced public transport use.

In summary, SGS suggested that the actual BCR of the project could well be less than 1:1, with NSW taxpayers exposed to the risk that the project may not succeed.

Searle G and Legacy Draft Paper

- Other criticisms of the Business Case focus on the limitations of the process. Searle and Legacy² raise fundamental issues about the way infrastructure business cases in general are developed, and WestConnex in particular.
- The first of these is the manner in which strategic transport and land use planning considerations are evaluated in business cases:
 - The Business Case did not factor in the impact of longer total journey lengths on urban sprawl, which will have a flow-cost for infrastructure and servicing.
 - The Business Case included benefits from WestConnex supporting more compact commercial land use (“agglomeration benefits”), when this is generally not the result of motorway investment, and is unlikely to be in the area served by Stage 3.
 - The Business Case did not attempt to cost the reductions in public transport, especially the loss of fare revenue.
 - Ancillary road projects necessitated by WestConnex, such as the potentially \$1BN Alexandria-Moore Park Connectivity Upgrade, should have been included in the Business Case.
 - Impact on property values, costs of noise during construction, and loss of business should all have been costed and included in the Business Case

¹ Roads Australia, 2013, Building the Case for Customers.

² Searle, G and Legacy, C, 2017, *Do the business cases for major Australian transport infrastructure adequately incorporate planning concerns?* Draft Paper for the State of Australian Cities Conference, Adelaide, November 2017

- Loss of heritage to the whole community (not just property owners) should have been included in the Business Case.
- The second is the manner in which other planning issues are excluded from cost-benefit analysis, which is a key component of developing a business case:
 - No analysis of equity impacts of the infrastructure investment and the tolling regime, given the lower socio-economic status of many areas of Western Sydney, and the requirement for potential users of WestConnex to own or pay for access to a private vehicle to be able to use it.
 - The localised impact of air quality around the ventilation outlets including the costs associated with the inevitable resultant health issues should have been accounted for.
 - Impacts associated with loss of amenity from reduced access to open space should have been accounted for.
- Searle attributes some of these issues with the Business Case to the decision of the NSW Government to accept the project as part of a State Infrastructure Strategy and other plans before a business case was developed. There was no incentive to explore alternatives or to fully explore the costs and benefits.
 - This process has been described as “lock in”. Commitment escalates because a project appears in numerous policy documents.
 - WestConnex is a clear example of government “locking in” commitment before detailed analysis had been undertaken.
- With the Government fully locked-in to WestConnex, these issues and inadequacies with the Updated Business Case are repeated in the EIS.

3 The strategic context and Project need remains unproven

The Strategic Context and project need are considered in Chapter 3 of the EIS.

3.1 The Project is not integrated with the NSW Government's Strategic Planning process

- WestConnex suggests that the Project forms part of an integrated planning solution. This is simply not true.
- While WestConnex might integrate with the wider motorway network, no evidence is provided demonstrating that it integrates with the wider road network – let alone the broader transport and land use system.
- The business case does not allow for any changes in traffic volumes entering the Sydney CBD caused by WestConnex. RMS has only just commenced work to identify which roads fanning out from WestConnex portals will need to be upgraded to deliver large numbers of vehicles to and from the project. It is therefore impossible to form a properly informed understanding of the environmental impacts of the project.
- The newly formed Greater Sydney Commission is currently preparing strategic plans (six District Plans and the Greater Sydney Region Plan) for Sydney's long-term future and TfNSW is currently developing Sydney's Transport Future. WestConnex should be placed on hold until finalisation of these plans.
- The Project focuses on 'catering for traffic growth' (P4.15). This contradicts and undermines the NSW Government's *Long Term Transport Master Plan* and *Future Transport* web site which commit to an integrated approach to congestion management focussed on land use planning, demand management, public transport investment and "a coherent whole of network planning strategy", essentially aiming for growth in public transport and containing road demand to that required to serve the freight and servicing tasks.
- The WestConnex program of works has been described as an integrated transport network solution. However, the role and interdependency with public transport and freight rail is not considered. The recent Government commitment to a Metro West requires a rethink on the need for WestConnex. Particularly as the WestConnex business case outlines a mode shift from public transport to the toll road as a benefit required to justify it economically.
- The Western Sydney Airport is due to commence construction this year with completion in 2026. Demand for air travel in Sydney is set to double over the next 20 years. Initial patronage is said to be 10 million passengers per year. Information should be provided demonstrating how (or whether) the project caters for travel to the new airport and the likely lessening of demand to the current monopoly airport.
- A great many of the most experienced and informed experts in the field of transport management and analysis have come out in opposition to this project citing failure of similar proposals elsewhere in the world. Clearly this is anything but 'a part of an integrated planning solution'.

4 The scope of the Project fails to meet its stated aims

4.1 Unplanned, unfunded Sydney Gateway benefits claimed for Project

- The EIS states that the project will improve connection to the Sydney Airport and Port Botany. This is not the case. The Premier herself has said that the Sydney Gateway does not form part of the WestConnex project. Without the Sydney Gateway, connections between WestConnex (St Peters Interchange) and Sydney Airport and Port Botany will be via congested surface roads in Botany and Mascot.
- As the connection is unresolved, it is impossible to determine the effect on demand of the unknown pricing regime that will apply to the Sydney Gateway and to determine just how much travel time would be incurred – which might actually negate the already marginal proposed travel time savings.

4.2 Rozelle and Iron Cove Interchanges do not achieve project objective, do not link M4 East and New M5.

- The Rozelle and Iron Cove interchanges do not meet the project objective of linking the M4 East and New M5 (Part 3.3 of EIS) and should not be included in the overall Project. Existing motorways (Cross City Tunnel and Eastern Distributor) would provide suitable road capacity to avoid the city centre.
- To the west there are the M7, A6 and A3 connections. There has been no modelling provided as to whether (with appropriate upgrades) these existing roads might provide far more cost effective and time efficient connections between the two motorways, particularly given their alignments would service multiple demand corridors at the same time.
- The project objectives (Part 3.3 of EIS) include enabling the construction of motorways over the harbour and to the northern beaches. However, the traffic impacts of these motorways in Rozelle have not been assessed. These projects were not part of the business case that justified the WestConnex proposal in the first place.
- This constant shifting of reason as to why the project is 'justified' points more to a seeming desperation to find some reason to build it, rather than there being a clear need which requires servicing.

5 The Project fails to meet its objectives

The project objectives are discussed at Section 3.3, page 3-22 of the EIS.

5.1 The Project does not meet its objectives

- Not only does the project fail to address its most fundamental objective of connecting to Port Botany, which was the genesis of the entire enterprise, it also does not connect to the airport. These were also key objectives.

5.2 The Project does not enable urban renewal

- The business case misrepresents the structure of the Global Economic Corridor and overstates the relationship of the project to centres within it by claiming the Project serves centres in the north of the GEC that it does not.
- The Project documentation asserts that WestConnex will be a catalyst for urban renewal along major corridors. No evidence is provided to back this assertion. The Sydney experience suggests that roads don't facilitate urban renewal – therefore WestConnex is not a likely catalyst e.g. Canterbury Road after M5 East; Cumberland Highway corridor after the M7.
- Significant improvements in rapid public transport are required for significant urban renewal. The experience in Sydney is that public transport is a strong and effective catalyst for urban renewal e.g. Green Square; Ultimo-Pyrmont with light rail; the Anzac Parade corridor, again with light rail; and Sydney Metro City and South West at Waterloo and along the Bankstown Line. The key ingredient is the political will to reallocate road space to rapid transit, or invest in dedicated rail solutions.
- The Parramatta Road Urban Transformation project has been put on hold by the NSW Government for a number of reasons, including the uncertainties relating to traffic capacity on Parramatta Road following the construction of WestConnex. To claim this as a benefit is misleading.
- The project predicts increased traffic congestion on Parramatta Road without the transformation, which clearly is not a benefit, and potentially funnels traffic unable to penetrate the corridor into the privately operated toll road.

5.3 Claims congestion will be eased are incorrect and misleading

- The EIS narrowly defines congestion as 'traffic congestion' rather than delays to reliable and efficient access to human capital, goods and services which reduces economic activity and productivity. This results in an incorrect and misleading assessment.
- The method and logic used to develop and assess the Project is similar to methods that have delivered numerous motorways around Australia that have not only failed to ease congestion, but have made it significantly worse.
- There is no reliable evidence presented (or available) that building motorways reduces traffic congestion over the long term. No major urban arterial road project, without carefully considered and implemented pricing signals, has succeeded in easing congestion for more than a few years. This is universally acknowledged in planning disciplines, and is

replicated by the Future Transport website. It has also been stated by the current Minister for Transport and the current Premier (during her time as Shadow Minister for Transport).

- The EIS projects increases in freight volumes without offering evidence as to how the project enables this. Assertions relating to improvements for freight services rely on the Sydney Gateway Project, which is not part of WestConnex, and which poses significant threats to the crucial freight rail connection to Port Botany. Port Botany itself has questioned whether the current project provides any benefit to it.
- The business case refers to benefits from road projects that are not part of the project's scope. The full costs, benefits and impacts of these projects need to be considered in a transparent process.
- The EIS asserts that the M4-M5 link would complete the orbital road network between western Sydney and the eastern gateways of Port Botany and Sydney Airport (p4.4). That orbital already exists in the form of the 110km Sydney Orbital - the M2, M7, M5, Eastern Distributor, Harbour Tunnel, Gore Hill Freeway and Lane Cove Tunnel.
- Rather than ease congestion the project is likely to increase it, as well as reduce the availability of funds for projects that genuinely reduce congestion (road pricing) and that give priority for high productivity road users such as delivery and service vehicles or genuinely avoid congestion. For example public transport in separate corridors/lanes.

5.4 The Project will slow down public transport

- According to the EIS, buses travelling to the CBD will be slower, despite the construction of a tunnel between Iron Cove and the Anzac Bridge. Bus travel times along Parramatta Road will improve, but only because bus lanes would be extended. This could be achieved without WestConnex - and for several billions of dollars less!
- The construction of a park in the Rozelle Goods Yards which would cover the motorway junction below is also being achieved by severing rail corridors which could service the Bays Precinct and Balmain, linking both with the broader Sydney Trains network.
- Buses attempting to enter and leave the Balmain peninsula will be delayed by the significantly increased traffic congestion on Victoria Road at White Bay and between the Anzac and Iron Cove Bridges.
- It is not inconceivable that vehicles exiting the 3 portals at White Bay will send Victoria Road from White Bay to the Gladesville Bridge and beyond, the City West Link and the Anzac Bridge, into extended peak hour gridlock.
- There will be major impacts on the Anzac Bridge (projected 60% increase in daily traffic) and Sydney City Centre. The EIS forecasts major impacts on bus travel time and reliability.
- Road congestion is reducing bus performance and reliability. The project will make it worse.
 - The EIS says traffic on ANZAC Bridge will increase by 2023 (p.8-103).
 - Traffic modelling shows bus times will be slower into the city in the morning (p.3-19).
 - The EIS identifies capacity constraints on ANZAC Bridge (p3-19). This project will dump more traffic onto the ANZAC Bridge which is already rated at Level of Service F (at capacity).

6 The Project fails to consider and assess transport alternatives

6.1 No strategic alternatives were assessed

- The basic question that the people of NSW need answered by the EIS is:

For the same or lower cost of the project, could we do something that is different to the project that will deliver outcomes that are as good or better?

- The Secretary's Environmental Assessment Requirements (SEARS) require analysis of feasible alternatives to the project.
- No feasible alternatives have been developed and no objective analysis of alternatives has been undertaken. While Section 4.4 of the EIS purports to cover *Strategic Alternatives*, it does little more than offer a discussion of why an alternative was not pursued.
- 'Maintenance works' approved by RMS in the Rozelle Goods Yards has undermined the possibility of a new surface light rail extension to White Bay and the Balmain Peninsula.
- As part of the 'works' RMS has removed all existing rail infrastructure which was in place for nearly a century. These valuable rail corridors had the potential to expand surface light rail connections across the region, which could have helped reduce road traffic.
- The Government is spending billions of taxpayer dollars via Metro Rail in an attempt to free itself of the restrictions now faced by a congested City Circle which imposes a chokepoint on the whole rail network. Expanding rail capacity obviously eases road traffic congestion.
- WestConnex displays a lack of understanding of contemporary good practice in transport problem resolution. It's long been recognised that building more roads doesn't reduce road traffic, it worsens congestion through induced demand.

6.2 Alternative road projects must be assessed

- Better use of existing road infrastructure has not been analysed as a feasible alternative. The EIS only refers to existing RMS programs. An analysis of urban road projects recommended in the *State Infrastructure Strategy Update 2014* should be conducted as strategic alternatives including:
 - Smart Motorways investments on the M4, the Warringah Freeway and Southern Cross Drive-General Holmes Drive
 - Upgrading the Sydney Coordinated Adaptive Traffic System (SCATS)
- At the very minimum, the assessment of Strategic Alternative 1 (*improvements to the existing arterial road network*) should:
 - Identify key network capacity issues.
 - Develop a scenario of investments in (potentially major) arterial road improvements required to address the road network capacity constraints. The City of Sydney's alternative scheme provides one example of what improvements to the existing arterial road network might look like.

- Carry out transport modelling and economic analysis to inform the assessment of the alternative.

6.3 Real integrated transport measures must be assessed

- There is no evidence of scenario modelling being used to allow testing the ability of different packages of integrated transport measures to achieve outcomes. The Long Term Transport Masterplan states that integrated approaches are required to manage congestion. The NSW Minister for Transport claims that we “have to get more people on public transport.”
- The assessment of Strategic Alternative 2 (*Investment in “alternative transport” modes*) should:
 - Identify key network capacity issues
 - Identify the shift away from private vehicles required to deliver the necessary relief on the road network to meet the future transport needs of Sydney
 - Identify the mix of investments in public transport, cycling and walking required to deliver these mode splits.
 - Use multi-modal transport modelling and economic assessment to inform the analysis and assessment of the alternative.

6.4 Travel demand management options must be assessed

- The assessment of Strategic Alternative 3 (*Travel Demand Management*) should:
 - Identify key network capacity issues
 - Consider the opportunity for travel demand management measures to address the road network capacity constraints. The measure should aim to retime, re-mode or reduce trips that make less productive use of congested road space.
 - Draw on a process of multi-modal transport modelling and economic assessment to inform the analysis and assessment of the alternative.

6.5 The Inquiry should investigate whether ‘shortfall’ and ‘competing travel’ clauses compromise public transport

- Similar toll road contracts in NSW and in Queensland contain clauses that indemnify the operators against losses where actual usage falls below that projected in the business case. The Sydney Harbour Tunnel has cost the State Government over \$1 billion because of the failure to meet the shortfall in usage.
- The inclusion of any ‘no competition’ clauses clearly robs the public of a viable public transport alternative and are clearly contrary to the public interest.
- The secrecy surrounding the contract details prevents public scrutiny and confirmation of the existence of these onerous clauses.

7 Failure to coordinate construction work with local councils

7.1 Local Councils have no say over 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*”. A similar commitment was made for construction of the New M5. It has been poorly managed.
- There is limited response to Council input and the Sydney Motorway Corporation and Roads and Maritime Services each deny responsibility and blame each other for a lack of action.
- This is despite the RMS being the client for the Sydney Motorways Corporation. It would appear this is a deliberate strategy of the NSW Government to ensure local communities affected by construction traffic have no reasonable means of managing any complaint. It is undemocratic, against the principles of open government espoused in the election platform of the current government and ultimately escalates community unrest. (P 8-44)

7.2 Only partial construction impacts have been assessed

- The EIS states that spoil handling at the Pyrmont Bridge Road Tunnel Site (C9) will “occur 24 hours a day, seven days a week” for about four years. Given the land use surrounding the site is dense residential, what mitigation measures will be used to control noise, light spill, etc. outside normal business hours? Have alternative living arrangements and/or compensation been considered? (P 8-55).
- The impact on residents subjected to out of hours (OOH) works has not been quantified. This is especially so in regards to the loss of sleep.
- The EIS focusses on the impact of construction traffic during commuter peak-hours. Given the EIS notes that construction-related vehicles will be limited during peak-hours, information should be provided on the impact of construction-related vehicles when both traffic volumes are higher – in particular during weekday lunch peak and Saturday lunch peak for sites like the Pyrmont Bridge Road Tunnel Site where operations are proposed 24/7. (Tables 8-46, 8-47, 8-48, 8-51, 8-52, 8-53).
- The great number of heritage houses in the Rozelle interchange construction zone has not been specifically addressed. Noise and vibration impacts can have far more significant impacts on these types of properties. There is no functional management plan for these risks, no articulated complaints investigation process nor any articulated compensation and remediation strategy.
- The emission of dust, noise, diesel exhaust and offensive odours has been appallingly mismanaged in the previous stages. The 24/7 operations will be especially debilitating for Rozelle, Lilyfield, White Bay, Annandale and Glebe residents who live adjacent to the Rozelle Goods yard.
- The construction site to be established along the western side of Victoria Road facilitating the construction of the Iron Cove Tunnel and portal will also negatively impact the residents of NW Rozelle.
- The Stage 3 contract is proposed to be a fixed sum contract. As construction cost overruns are commonplace with infrastructure projects, including earlier stages of WestConnex,

there will be no money available at the end of the project to rectify the inevitable structural damage caused to homes, especially those constructed in the mid/late 1800's.

- With shallow tunnels passing beneath these structures, built on footings that are deemed to be unacceptable by modern construction standards, the possibility of serious structural damage is inevitable.
- The sale of WestConnex to an overseas buyer makes the rectification of structural damage even more unlikely, with little to no likelihood of a successful compensation claim.

7.3 Construction impacts on people walking and cycling

- Part 3 of the Secretary's Environmental Assessment Requirements requires assessment of the likely risks of the project to public safety, paying particular attention to pedestrian safety. This is not addressed in Chapter 8.
- The removal of the pedestrian and cycle bridge over Victoria Road at the junction of Lilyfield Road poses a real hazard to SW Rozelle residents travelling to the city. Forcing pedestrians to use the proposed underpass beneath Victoria Road will place them in jeopardy. Female members of RAW have expressed concern for their safety and of the very real possibility of assault in the underpass and approaches.
- Because of the safety concerns and the extra distance to travel, pedestrians will be tempted to cross Victoria Road to reach the bus stop, rather than use the proposed underpass, thus increasing the risk of traffic injuries and fatalities.
- Pedestrian amenity around the bottom of Victoria Road, where it meets The Crescent will be severely hampered with the removal of the two pedestrian and cycle bridges which currently provide safe and easily scaled regional links to major bus nodes. These also provide safe and easy walking links between Rozelle Bay and Balmain.
- There have been suggested 'upgrades' to Victoria Road's traffic lanes, but why is this necessary if the Iron Cove Link was meant to 'traffic calm' the area? Traffic should not be allowed to amplify in this area.
- A direct pedestrian link could also be encouraged between Gordon Street and the Rozelle Bay light rail stop on the other side of the CityWest Link, as the Gordon Street area of Rozelle is the most remote from light rail services and the line of Gordon Street itself is quite direct for possible pedestrian links into Balmain along the foreshore.
- The existing pedestrian links to the Rozelle Bay light rail stop in Annandale should not be hampered by escalation in traffic forecast which occur as a result of upgrades to The Crescent or CityWest Link.
- Indeed the design of safer, better separated and more efficient active transit links will be required wherever possible at this intersection (and others) and should have been encouraged for the local communities of Rozelle and Annandale as part of any road upgrades, as a condition of approval.
- The EIS uses criteria to assess the impact of existing walking and cycling routes that will need to be diverted as a result of the M4-M5 Link. The criteria are based on distance only and exclude the additional travel time taken to complete the diversion.
- This approach is flawed and should also consider travel time – if it did, this would completely change the assessment of the proposed removal of the existing pedestrian and cycle bridge over City West Link. (P 8-71, Table 8-50). Further, the EIS is silent as to whether the existing pedestrian and cycle bridge over the City West Link will be replaced post-construction (P 8-73).

8 Inaccurate traffic and transport modelling ensures a flawed business case

8.1 The traffic modelling approach is fundamentally flawed and inaccurate

The modelling is implausible

- Incorrect traffic modelling by AECOM has led to overoptimistic traffic predictions which resulted in low toll revenue from the Cross City Tunnel, Lane Cove Tunnel and Brisconnex in Brisbane, resulting in eventual bankruptcy.
- The traffic modelling process used to develop the Project is fundamentally flawed because WestConnex traffic modelling relies on implausible traffic volumes that exceed the capacity of the road links and intersections at several key locations
- The traffic modelling process places significant risks on the people of NSW in terms of toll earnings that are significantly lower than projections – resulting in government subsidising the owner for lost earnings.
- The modelling process incorporates a highly unusual definition of induced traffic (p.45 of Appendix H). Induced traffic should not include the increase in trips due population growth and land use changes as these are modelled elsewhere.
- The induced demand of 0.3% is too low based on historical experience in Sydney.
- SMC refuses to release the traffic model and detailed analysis for independent unpaid peer review and scenario analysis.
- There is an assumption that traffic would dissipate at the edge of the motorway with no negative impacts on Victoria Road, The Crescent, Johnston Street and major streets in other Inner West suburbs. The traffic impact of the future Western Harbour Tunnel and Beaches Link entry and exit ramps connecting to City West Link/The Crescent has not been assessed.
- Unreliable traffic projections lead to significant and compounding errors in the design, EIS and business case processes.

8.2 Specific examples of shortcomings of the traffic modelling process

- The projected traffic volumes would exceed the capacity of the motorways and surrounding surface roads preventing them from delivering their objectives.
- The St Peters / Sydney Park Interchange will overload 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 that people have the capacity to shift the time that they travel.

- The modelling shows severe degradation to the City West Link if the Western Harbour Tunnel is connected however the CWL will already be at capacity due to Stage 1.
- The modelling shows severe traffic levels and increased congestion on Johnston St and The Crescent increasing by 80% of average daily traffic (ADT).
- The modelling makes no mention of bus lanes on Victoria Rd. If these lanes were not modelled as car lanes the assumed capacity of the road is incorrect.

8.3 Specific traffic impacts associated with the Project

Numerous intersections and roads will be significantly worse with the project

- The Project will have significant impacts on the streets near on- and off-ramps. Modelling shows that the Anzac Bridge will have 60% more traffic in 2033 because of the Project. It is also recognised that Anzac is already at capacity during peak hour.
- The key intersection performance tables in App H (p.258 St Peters and 248 Rozelle) demonstrate that many intersections will either worsen (at the worst case scenario of LOS F) or remain unchanged particularly in 2033, including a number in St Peters and the following intersections in Rozelle:
 - Victoria Road/Darling Street
 - Victoria Road/Robert Street

The Project will have major impacts on the Sydney CBD

- The analysis shows Anzac Bridge/Western Distributor is currently at capacity, particularly in the AM peak where existing operational and geometric features of the road network limit the capacity. This Level of Service is acknowledged by the proponents as Level (F), the lowest possible grading.
- The EIS notes that under all scenarios the Project will generate significant additional traffic on these links, requiring major and costly additional motorway infrastructure to the CBD.
- This is despite the fact that the NSW Government recognises that there is no capacity to accommodate additional car trips to the CBD and all its policies aim to allocate more street space to public transport, walking and cycling. The EIS fails to assess and identify any upgrades that the Project will cause or require. (App H p. xxxiii)

The Project will have major impacts on the roads to the west and south

- The EIS notes that the Project would cause additional traffic congestion on a number of key roads including: Gardeners Road and Bourke Road in the south, Frederick Street (Ashfield), Johnston Street (Annandale) and numerous streets in Mascot (p.8-103). The EIS must assess and identify any upgrades that the Project will require, as well as the subsequent environmental impact.

8.4 No details provided of road upgrades required by the Project

Impacts on surrounding road network and required upgrades not detailed

- 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 and reflects a clear admission on the part of the NSW Government that:

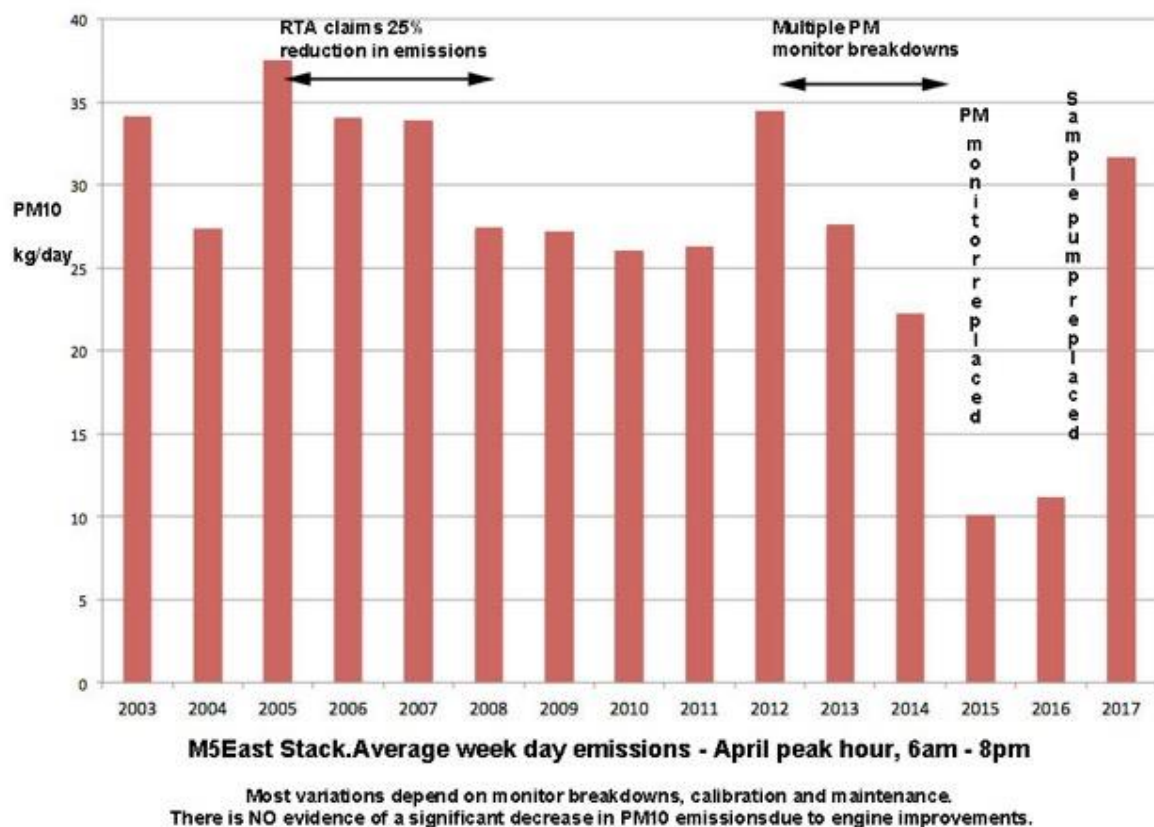
- It has no confidence in the traffic modelling process to predict to any reliable extent the likely impacts of the Project;
 - It is unable or unprepared to describe the true impacts of the Project on the people of NSW;
 - It has not considered or budgeted for the potentially significant additional roadwork required to address the impacts of the Project (or the need for road upgrades to feed toll-paying drivers to WestConnex).
- The nature of these “post-opening mitigation measures” are unknown 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 people of NSW 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 EIS (App H, p.269) refers to the RMS plans to carry out “network integration” works surrounding the Rozelle interchange once the project is complete but offers little detail of the nature of the works. It mentions the intersection of the Western Distributor and Pyrmont Bridge Road at Pyrmont, Western Distributor near Darling Harbour and a review of kerbside uses near the Western Distributor, The Crescent, Johnston Street and Ross Street.
 - Given that these works could be undertaken to deliver toll paying drivers to the privately owned WestConnex, there is strong potential for a conflict between private profit and community impacts.
 - The cost of any such 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’s normal maintenance and improvements 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 just four short paragraphs!*
 - Western Sydney motorists are avoiding the new tolls on the M4 in ever increasing numbers. This toll aversion and avoidance will no doubt increase once Stage 2 is opened to the public, resulting in further incidences of rat running throughout the Inner West.
 - This will ultimately lead to further expenditure in an attempt to increase the capacity of these local roads, thus further impinging on residential amenity. These costs will be borne by the taxpayers of NSW.

9 Air Quality claims can't be substantiated

- *Medical scientists have found that there is no safe level of air pollution!*
- As pollution levels rise deaths and hospitalisations rise too³. A thorough cost-benefit analysis that takes into account the health effects due to increased exposure should have been included in the business case. This is a serious and deliberate omission.
- Concentrations of some pollutants PM_{2.5} and PM₁₀ are already near the current standard and in excess of proposed standards (p9-81, p9-93).
- It is critical to note that 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, much higher incidences of chronic lung conditions and higher levels of cardiovascular diseases.
- 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.
- Given that the modelling for air quality is based on the traffic modelling, which, as shown above, is fundamentally flawed, and given poor air quality has a significant health impact, the business case should have included the health costs and is a cogent argument against the project proceeding.
- The stacks in Rozelle are of particularly serious concern as they are in a residential area next to a large number of proposed playing fields,— whereby tunnel pollution from Cammeray in the north – should the WHT be built and St Peters in the south, is released into Rozelle.
- The tops of these stacks are lower than the residential areas directly to the North of the stack 'cluster'. This is the same as the situation with the M5 East stack where there were and are reliably established reports of serious impacts of stack emissions under some weather and wind conditions.
- The Rozelle interchange proposes an unprecedented concentration of four stacks, in two valleys, adjacent to densely populated suburbs. The interchange has steep and long climbs, increasing emission concentrations, which will then be pumped into the surrounding area. The modelling does not account for stop-start conditions.
- No consideration has been given to the cumulative impacts of these proposed stacks in relation to the berthing of Cruise ships at White Bay and the use of on board diesel generation for shipboard power while ships are docked. This has been shown to be a significant source of additional PM and SO₂ pollution overseas.
- The EIS shows significant traffic volumes heading onto the Anzac Bridge, which already operates at the lowest Level of Service (F) in peak times. There will be significant queues heading into the tunnels, greatly increasing the level of emissions. The existing M5 in peak conditions may provide a more realistic base line.
- Figures provided from the RMS in relation to the Lane Cove Tunnel show that tunnel users will be exposed to *more than 50 times the maximum levels* suggested by the WHO at the end of the tunnel.

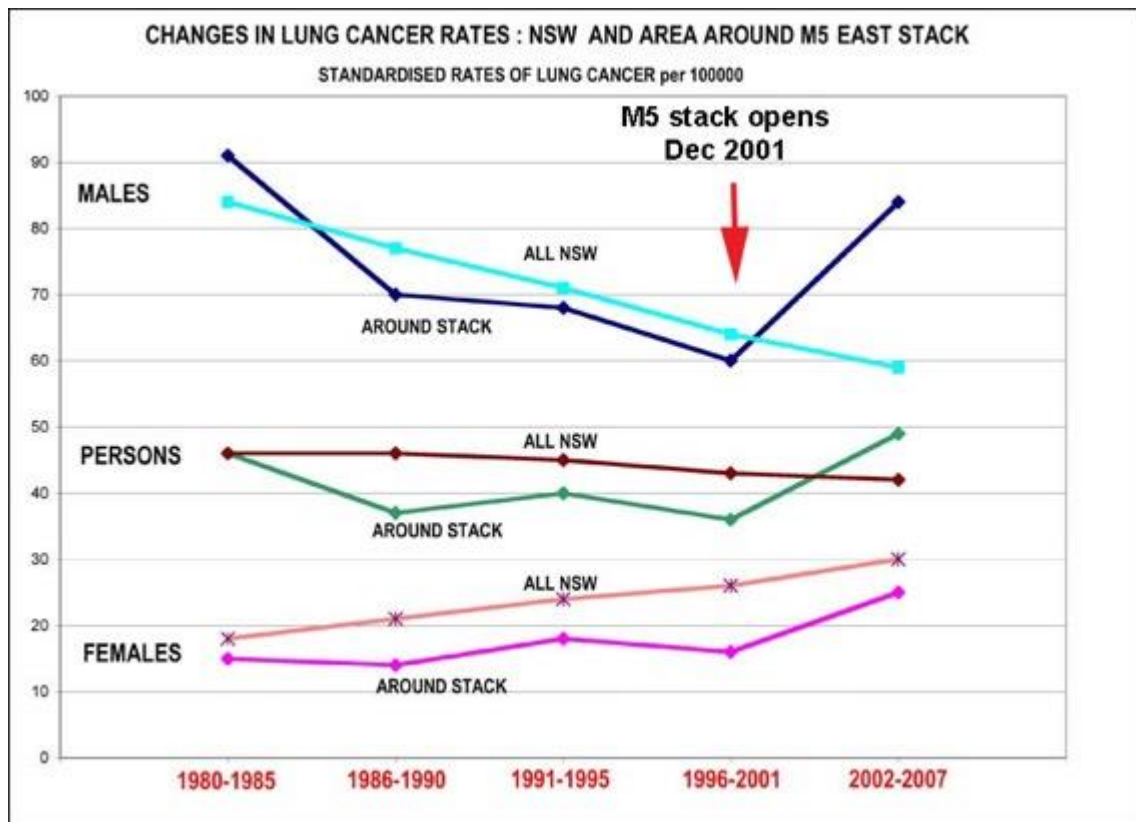
³ Barnett, Adrian G, *It's safe to say there is no safe level of air pollution*, Australian and New Zealand Journal of Public Health Vol 38. Issue 5

- There will be extended delays at the Rozelle and St Peters portals with traffic backing up well into the tunnels during peak periods. Vehicle occupants will suffer serious over exposure due to the cumulative effects of continued exposure to both PM and NO2 pollution with the certainty that serious and lethal health related issues will follow.
- M5 East figures from 2003 to 2017 provided by the RMS are shown in the graph below and record a daily emission of an average 32 kilograms of particulate matter from the M5 East stack. This translates into approximately 10 tonnes of unfiltered carcinogenic < PM 2.5 released annually.
- The massive concentration predicted at the Rozelle Interchange *could easily exceed 50 tonnes per annum from the 4 stacks*, thus enshrining White Bay and the surrounding region as the most heavily *intentionally* polluted area in the country.
- The graph that follows was prepared by Mark Curran from Residents Against Polluting Stacks based on raw data provided to him by the RMS, (previously the RTA), since the late 1990's.



- Research undertaken by the Sydney South West Area Heath Service in 2011, in response to a cancer cluster around the M5 East exhaust stack, suggested that this could well be attributed to the emissions from the stack. They were unable to exclude the stack as a possible source of the observed increases in lung cancer in the area immediately adjacent to the stack.
- The 40% increase in cancer in this local population was contrasted with a fall in cancer rates of 9% across the State, during the same period. It is noteworthy that prior to the opening of the M5 the incidence of lung cancer in this area was somewhat lower than the State average.

- It has been suggested that the proximity to both the port and the airport may have been the cause, however there was *no evidence of a cancer cluster in any of the other adjacent suburbs!*



- The above graph was prepared by the NSW Department of Health. The arrow indicating the opening of the M5 Stack was added by Mark Curran, a retired scientist and long term critic of the M5 East vehicle exhaust treatment.
- The steady increase in the rate of female cancers across the state has been attributed to the increased incidence of females smoking. It is noteworthy though that these rates around the stack had been in decline since 1991.

10 Impact on property and residential amenity

- Increased traffic on local roads due to rat running will seriously impact on residential amenity. The construction of four unfiltered stacks in Rozelle emitting in excess of 50 tonnes of carcinogenic material annually will impact on residential property values, as well as on the desirability of the White Bay region and adjoining suburbs as a safe and healthy place to raise a family.

11 Promised open space is toxic

- Both the St Peters and the Rozelle Interchange active recreation areas are a false promise. Without an agreement for construction and management, they will remain wastelands with compromised amenity, polluted by adjacent exhaust stacks, each spewing imported carcinogenic material, unsuitable for sporting and passive recreation, isolated by above ground portals and difficult, if not impossible to access across busy major roads.
- The unfiltered exhaust stacks in these proposed parks are seen by the community as toxic health hazards, making these places unsuitable for use and so to be avoided at all costs.

12 Cumulative impact not considered

- The TfNSW website says “The Sydney Metro West project is Sydney’s next big railway infrastructure investment” but the Cumulative Impact assessment by AECOM (App C) does not include Sydney Metro West. A business case for Sydney Metro West should be completed before the determination of the Project.
- The Project will undermine the attractiveness of Central Sydney to internationally competitive high productivity firms and their potential employees. Google pulling out of White bay is a case in point.
- Increased traffic cannot be accommodated in Central Sydney or on the Anzac Bridge. 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.
- No cumulative impact has been considered by the removal of the freight rail corridor in the Rozelle Rail Yards. It is possible light rail extension to the Balmain Peninsula could have been achieved, had this rail corridor been preserved for future adaptive re-use. This link (running under Victoria Road) could serve both the Cruise Terminal and the redeveloped White Bay Power Station – as well as any future development.
- WestConnex will prove the antithesis of common sense and fiscal sobriety when it comes to practicality, economic productivity, creating good value property, environmental planning, social planning and basic transport planning, if Sydney now replaces what have been good public transport links, with more motorways.
- What is sorely needed is additional, accessible, affordable, efficient public transport, especially rail - be it underground metro, suburban doubledecks or light rail, and costs should reflect need. The NSW public are the big losers with this ill-advised Project.

-----ooOoo-----

13 Recommendations arising from RAW's Submission

- That this Parliamentary Inquiry finds that sufficient justification exists for a Royal Commission into WestConnex and recommends that a Royal Commission be established.
- That no further contracts be signed in relation to either Stage 3a and Stage 3b and the Western Harbour Tunnel until the Royal Commission releases its findings.
- That provision of both concentric and radial public transport links be established in the greater Sydney region as a matter of urgency.
- That any new urban road tunnels must reflect public need and be designed and built incorporating state of the art particle and nitrogen oxides filtration.
- That state of the art filtration equipment must not only be correctly installed and tested prior to handover, but it must also be maintained by competent operators who are licenced and approved by the equipment suppliers.
- That existing road tunnels must be retro fitted with state of the art particle and nitrogen oxides filtration.
- That pollution monitors must be installed and maintained at all tunnel portals, ventilation facilities and exhaust stacks.
- That existing development consent conditions requiring 'zero emissions' at tunnel portals must be enforced.
- That costs associated with upgrading existing filtration to be borne by the tunnel operators.
- That National standards for PM and NO2 need to be clearly articulated, enshrined in legislation and rigidly enforced.

-----ooOoo-----