

**CITY OF SYDNEY
SUBMISSION ON WESTCONNEX STAGE 3 M4-M5 LINK
CONCEPT DESIGN (RELEASED MAY 2017)**

EXECUTIVE SUMMARY

The City of Sydney strongly objects to and opposes WestConnex. This expensive toll road project condemns Sydneysiders to a future of worsening congestion and increasing tolls.

The justification for WestConnex (including the business case) is non-existent and the project is an unmitigated disaster for our global city. As a key driver for the national economy, Sydney's future is vital to Australia's future and the future of NSW. More than \$110 billion is generated each year within our local government area representing over seven per cent of Australia's economy and 24 per cent of the State's GDP.

One of the most significant risks to the future economic viability of our city centre is congestion. The business case for WestConnex makes clear it will dramatically increase congestion which is a significant threat to our future liveability and to investment in the city centre and Green Square.

It also threatens the health and safety of nearby communities.

The City of Sydney has developed a credible alternative that requires assessment by the NSW Government. The alternate plan can be accessed online at: http://www.cityofsydney.nsw.gov.au/_data/assets/pdf_file/0003/286158/12707-WestConnex-Alternative-proposal.pdf. To date, the NSW Government has provided no real assessment of alternative options where investment in additional capacity will best meet the identified future transport needs.

The NSW Government has failed to provide a sound justification for the current design of WestConnex. The whole premise of the current proposal – to reduce congestion for people in Western Sydney – is blatantly false.

The business case and data shows:

- WestConnex will save most western Sydney users only five minutes or less;
- It will reach capacity in just eight years;
- In many cases catching public transport will remain a faster way to move around; and
- Public transport use is growing rapidly.

The business case also shows that only one per cent of daily trips in the Sydney region will benefit from WestConnex.

The NSW Government has provided no clear articulation of the future transport need that the WestConnex project addresses and has provided little credible evidence or data to justify the solutions being proposed.

The Government's recent announcements about WestConnex since the City released its alternative plan have simply reinforced the principal arguments against the WestConnex Stage 3 M4-M5 Link (M4-M5 Link).

It does not provide a direct, fast or safe connection to Port Botany for freight or a design solution for Port Botany.

The M4-M5 Link is designed as one component of the WestConnex program of works, with the final phase being the Sydney Gateway (the Gateway). The Gateway is a connection between the St Peters Interchange and the Sydney Airport and Port Botany precincts without which the supposed benefits of the M4-M5 Link cannot be realised.

The current design doesn't serve this original purpose. Despite the Government's enthusiastic support for the Sydney Gateway project, ***in reality it remains a project in name only***. There is no information available about it, no preliminary design, which raises questions about whether the project is feasible, particularly given the technical challenges involved at Sydney Airport.

The completion of the M4-M5 Link without the Gateway means the primary goal of completing the link between Sydney's west and south-west with Sydney Airport and the Port Botany precinct will have failed.

The entire WestConnex M4-M5 Link Concept Design (Concept Design) is based on incomplete and out of date assumptions that invalidate its design.

Recent announcements regarding the delivery of the F6, Western Harbour Tunnel and Northern Beaches Link require revisiting of the concept.

There have been repeated failures in using traffic models to accurately predict motorway demand. In Sydney, that includes the M2, M4, M5, Lane Cove Tunnel, Sydney Harbour Tunnel and the Cross City Tunnel being incorrect. The real usage has been as little as around a third of the prediction. Therefore a precautionary approach is justified

Benefits outlined in the WestConnex Concept Design document could be delivered without the M4-M5 Link.

Instead of building the WestConnex M4 – M5 connection between Haberfield, Rozelle Interchange and St Peters interchange, the City of Sydney is urging the State to investigate the option of upgrading the existing A3 connection between the M4 at Homebush and the M5 at Kingsgrove. Grade separations, intersection upgrades, and localised widening would significantly improve the capacity and flow along this corridor at far less cost.

The Concept Design sets out a number of beneficial outcomes that are suggested will result from the project. However the costly M4-M5 Link is not a pre-requisite for the delivery of

these outcomes, particularly in light of the negative impacts the project would create and should not be used to help justify the case for the M4-M5 Link.

These factors, and the City's more holistic solution, demand a rethink, now, on an effective transport solution to replace the M4-M5 Link – one that can be delivered with the greatest possible benefit and the least amount of community disruption and long-term harm.

WestConnex (and specifically the M4-M5 Link) will have significant impact on surrounding communities

The City and Inner West Councils know their unique communities well and have a clear understanding of how WestConnex will impact on them. The two councils' strong opposition to WestConnex indicates that the WestConnex program of works needs further investigation, combined with a comprehensive consideration of the alternatives that both councils have put forward.

The increased traffic resulting from this project will reduce urban amenity and increase local road congestion for motorists, and will materially affect the efficiency of the City's public transport.

City of Sydney has developed a credible alternative that warrants thorough consideration

The City of Sydney strongly recommends the NSW Government and proponent to pause and reconsider both the WestConnex Stage 2 New M5 (New M5) and WestConnex Stage 3 M4-M5 Link (M4-M5 Link) and consider the solutions proposed in our alternative plan. It is a comprehensive plan that starts with demand management to limit the infrastructure required, and then shapes the infrastructure to meet the objectives the Government set for WestConnex in the first place.

The City's alternative plan has the support of Inner West Council with whom the City is unified in its strong opposition to WestConnex.

The planning approvals and consultation process is flawed

Overall the City is extremely dissatisfied with the lack of detailed information in the Concept Design which precludes the City's ability to comment in full. The City expects that should an Environmental Impact Statement (EIS) be developed, that it will provide all the relevant information the public needs to assess the project comprehensively.

Prior to the release of any EIS however, the City expects to receive a 'Response to Submissions Report' which comprehensively addresses the issues raised by submitters on the Concept Design and includes an assessment of alternative plans. The City also seeks a period of at least three months for submissions on any EIS, noting that the school holidays are likely to fall within the submission period.

It is the City's view that in the event that the process continues to the EIS stage, that the M4-M5 Link and the Gateway should be considered together given how inextricably linked they are.

Any planned EIS for the M4-M5 Link should be expanded to cover the Gateway so that the two components can be properly understood in relation to each other as a strategic network issue, in a way that the dependencies and claimed benefits can be comprehensively assessed, and tested against alternative solutions.

The City's submission on the New M5 EIS, which outlines the City's concerns about WestConnex based on the greater level of detail provided in the EIS, should be read in conjunction with this submission. The submission with attachments can be accessed at:

http://www.cityofsydney.nsw.gov.au/_data/assets/pdf_file/0004/250627/City-of-Sydney-submission-WestConnex-New-M5-Environmental-Impact-Statement.PDF

http://www.cityofsydney.nsw.gov.au/_data/assets/pdf_file/0006/250629/WestConnex-New-M5-EIS-Review-of-Strategic-Alternatives-And-Socio-economic-Impacts.PDF

http://www.cityofsydney.nsw.gov.au/_data/assets/pdf_file/0016/250630/WestConnex-New-M5-EIS-Review-of-Traffic-and-Transport-PART-1.pdf

http://www.cityofsydney.nsw.gov.au/_data/assets/pdf_file/0017/250631/WestConnex-New-M5-EIS-Review-of-Traffic-and-Transport-PART-2.pdf

http://www.cityofsydney.nsw.gov.au/_data/assets/pdf_file/0005/250628/WestConnex-New-M5-EIS-Review-of-Biodiversity-Assessment.PDF

The City's submission follows the headings set out in the Concept Design.

Should you wish to discuss the City's submission, please contact Elise Webster, Senior Project Manager Transport, on 9288 5967 or at EWebster@cityofsydney.nsw.gov.au.

RESPONSE TO SECTION 2 – THE M4-M5 LINK

WestConnex is presented as a ‘transformational’ infrastructure project however it is not clear what positive transformation will result from the M4-M5 Link. All that is certain is that WestConnex will deliver a piece of infrastructure that increases traffic on local roads, is inconsistent with the Government’s land use priorities, and creates significant negative impacts for local communities. Like all road projects, this project is focused on the movement of vehicles rather than the efficient movement of people and goods and shows an obvious disregard for place in terms of integration with land use.

When capacity on WestConnex is reached, the case for the M4-M5 Link is even more tenuous. Experience with other road projects has proven that a new motorway can reach and even exceed capacity relatively soon after it is built. When this occurs with Stage 2 and 3 of WestConnex, Sydney will be left with a transport legacy that fails to achieve its goals and cannot support the jobs growth in the west consistent with Government policy.

The Concept Design makes a number of claims about what the M4-M5 Link will do as a means of highlighting the benefits of Stage 3 of WestConnex. Yet many of these aims, for example creating a new park on the site of the Rozelle Rail Yards, can be achieved without the need to construct an expensive and disruptive major motorway. The Concept Design fails to provide any information about some stated aims, for example what are the future public transport opportunities and how will the M4-M5 Link create and deliver these benefits?

The completion of the M4-M5 Link will place greater strain on the local roads in and around St Peters as evidenced in the traffic modelling presented in the New M5 EIS. In response, local streets will need to be proactively protected from rat running and increased traffic as the new infrastructure is opened to traffic.

The City is similarly concerned about the impacts on Annandale, Glebe and Camperdown. These localities will potentially be hugely impacted by additional surface traffic and must be protected from the outset.

The *WestConnex Updated Strategic Business Case* released in November 2015 refers to the NSW Department of Planning & Environment *Plan for Growing Sydney* which identifies the Parramatta Road corridor as a focus for increased housing, economic activity and social infrastructure given its strategic location. The *WestConnex Updated Strategic Business Case* notes that enabling urban renewal and regeneration along Parramatta Road remains one of the main objectives of the project.

Many of the Government’s *NSW 2021* goals form the basis for the WestConnex business case and include:

- Goal 8 – Grow public transport patronage by increasing the uptake in public transport usage as a means of reducing traffic congestion, improving travel times, and providing environmental benefits
- Goal 20 – Build liveable centres by delivering great places to live and work, making it easier to travel between work and home through good strategic planning

The urban renewal and transport projects enabled by WestConnex are not, however, proceeding. Consequently a substantial part of the urban renewal and housing supply on Parramatta Road will not eventuate to the extent discussed in the business case. WestConnex is therefore failing to achieve Goals 8 and 20 which are included in the business case for WestConnex.

The City's alternative plan involves demand management to limit the infrastructure required, and shaping the infrastructure to meet the Government's objectives for WestConnex. The many announcements of extensions made by the Government since the alternative plan was released have simply reinforced the principal arguments against Stage 3. It does not provide a direct, fast or safe connection to Port Botany for freight and there is no design solution provided for Port Botany. At the very least a southern alignment for the New M5 is required to provide that connection cost effectively and logically which requires that the Stage 3 solution is changed.

Recommendation

- Outline
 - what specific transport opportunities the M4-M5 Link will deliver
 - how local streets will be protected from the consequences of increased traffic when the new infrastructure is opened
 - how WestConnex will grow public transport patronage (goal 8)
 - how liveable centres will be delivered (goal 20)
- Comprehensively analyse the City's alternative plan

RESPONSE TO SECTION 4 – PURPOSE OF THE DESIGN CONSULTATION

WestConnex seeks comment on a number of related plans and activities including the delivery and implementation of active transport connections, the masterplan for the Rozelle Rail Yards and landscape treatments. However the level of detail provided falls well short of a Reference Design the Government promised would be delivered prior to the release of the M4-M5 Link EIS and precludes considered feedback. If the M4-M5 Link does proceed, the Government must at a minimum commit to funding and delivering the projects referred to in this section.

Recommendation

- Commit to funding and delivering all projects referenced in this section

RESPONSE TO SECTION 5 – WE ARE LISTENING

The City's clear message about WestConnex is that no compelling case exists for WestConnex and that neither the New M5 nor the M4-M5 Link should proceed. Over the course of a number of submissions including on the Community Consultation process, the Secretary's Environmental Assessment Requirements, the New M5 EIS and Detailed Design Package, the City has set out its arguments against WestConnex. The City has also

developed an alternative plan which could deliver on many of the stated objectives for WestConnex, without the significant impacts that will arise should WestConnex proceed.

The City expects to see a detailed 'Response to Submissions Report' on the M4-M5 Link which addresses the issues the City has raised including a comprehensive examination of the City's alternative plan and its the demand management components, and due consideration of whether WestConnex Stage 2 and 3 are viable. The City believes WestConnex is neither viable nor required and that no case exists for proceeding to the EIS stage.

Should the M4-M5 Link move to the EIS stage, it must provide the requisite level of detail to allow the City to comprehensively assess the project, including the reasons why the Link should proceed when the Sydney Gateway has not yet been confirmed nor any details about the project been made available. In addition to the concerns the City holds about WestConnex overall, the City is particularly baffled about what objective the M4-M5 Link would accomplish in the absence of the completion of the Sydney Gateway.

Consultation and submission periods for previous WestConnex documents, for example the draft Urban Design and Landscape Plan, has been truncated and this must not be repeated for any EIS issued for the M4-M5 Link. Consultation must be for a minimum period of three months particularly if it falls over a school holiday period.

Recommendation

- Provide a detailed 'Report Back on Submissions' on the M4-M5 Link which comprehensively addresses the issues the City and other submitters have raised
- Outline what objective the M4-M5 Link will accomplish in the absence of the completion of the Sydney Gateway
- Provide a minimum of three months for submissions, should an EIS for the M4-M5 Link be released

RESPONSE TO SECTION 6 – CONSTRUCTION

The City's experience of construction activities related to the New M5 at St Peters demonstrates the need to more effectively manage construction impacts. These impacts can be severe and long lasting, placing increased stress on local residents and businesses. Roads and Maritime Services (RMS), as the project proponent, must take responsibility for construction impacts including the work and behaviour of contractors and sub-contractors.

The City is concerned about the ongoing impacts on the St Peters community particularly given the proposal to extend the period that the construction site will operate at St Peters for the construction of the M4-M5 Link. This community is already under severe stress and further works at the St Peters Interchange will increase and prolong local impacts.

Recommendation

- RMS as the project proponent to take full responsibility for construction activities at St Peters

RESPONSE TO SECTION 7 – VENTILATION FACILITIES

The Concept Design states that the ventilations systems are designed to have zero portal emissions however with increases in traffic over the next decade, congestion at the portals, especially at peak traffic hours will most likely form concentrated zones of vehicular exhaust emissions. The City requires more details, including information based on in-tunnel ventilation modelling, to understand the full impact on local communities before we can respond fully to what is being proposed.

The City is concerned that the ventilation facilities will be unfiltered, even if this complies with regional air quality standards, and believes that filters should be applied.

It is important that the ventilation shaft planned for location at the St Peters Interchange are placed in a location which maximises the space of the St Peters Recreational Area, minimises the decorative landscape and does not create unsafe spaces.

And given the proximity to the air corridor, the truncated height of the proposed stacks should be evaluated as to the distributive effects of particulates to the adjacent public recreation area in Sydney Park.

Recommendation

- Make more information available so that the public can assess the proposal including the results of in-tunnel ventilation modelling
- Apply filters to the ventilation facilities
- Locate the ventilation shaft at the St Peters Interchange so that the St Peters Recreational Area can be maximised
- Evaluate the distributive effects of particulates to the adjacent public recreation area in Sydney Park

RESPONSE TO SECTION 8 – NEWTOWN/ST PETERS

The Concept Design refers to a number of conditions that have been applied which relate to how the project area will be used after the New M5 has been completed. These include the construction of a land bridge connecting St Peters and Sydney Park; the development of an Active Recreation Strategy; a review of the Pedestrian and Cycle Network for the area within one kilometre of St Peters Interchange; and the development of a 'King Street Gateway' concept. In addition an Urban Design and Landscape Plan has been developed.

The City has submitted in full on each of these matters and **attach** as Appendix A, the City's submission on the draft Urban Design and Landscape Plan; Appendices Bi and Bii, the City's feedback on the St Peters Recreational Area; and Appendix C, the City's comments on the Pedestrian and Cycle Network Review. The City is also continuing to work with RMS on the development of a 'King Street Gateway'.

In relation to the St Peters Recreational Area, the City notes that this can be completed without the M4-M5 link which would make more land available in an area which lacks sufficient numbers of sports fields and other recreational outdoor facilities. If the M4-M5

does proceed, this space must be maximised through the use of underground water retention and a reduction in the footprint of motorway facility buildings.

It is imperative that the Government commit to the funding and delivery of the St Peters Recreational Area as an integral part of the infrastructure works. This includes both construction and maintenance costs for an initial period of five years. The St Peters Recreational Area is highlighted as a key outcome of the M4-M5 program of works and it is vital that this is delivered in full.

Similarly the government must make firm commitments to the funding and delivery of the Urban Design and Landscape Plan, the land bridge, the Pedestrian and Cycle network and the 'King Street Gateway'.

With regard to the land bridge, in addition to ensuring that there is no interference to the City Farm and that it integrates with the shared paths in Sydney Park, the land bridge must not disrupt the functioning of the bio retention swale which is in close proximity to the location of the bridge and other wetland/environmental works in Sydney Park, including bush restoration works. The City's full comments on the land bridge are included in its submission on the St Peters Recreational Area.

Recommendation

- If the M4-M5 Link proceeds, maximise the space for the St Peters Recreational Area through the use of underground water retention and reduce the footprint of the motorway facility buildings
- The Government must commit to the funding and delivery of the:
 - St Peters Recreational Area
 - Urban Design and Landscape Plan
 - Land Bridge
 - Pedestrian and Cycle Network
 - 'King Street Gateway'

RESPONSE TO SECTION 13 – ROZELLE

The Rozelle Interchange connections will place increased traffic on to the Anzac Bridge and the east west roads through the Sydney city centre, in particular Market and King Streets. The Sydney city centre is the pre-eminent business district in Australia, with a reliance on pedestrian accessibility and amenity and additional traffic cannot be accommodated in the city centre. Traffic attempting to access the city centre from WestConnex will increase delays for economically essential vehicles including those servicing and delivering to businesses.

The Rozelle Interchange concept also raises a number of safety concerns. The complexity of the underground road network must be closely examined to ensure safety and appropriate emergency systems are in place. It is noted that while road tunnels are relatively common throughout the world, major underground motorway interchanges are not.

The City has been advised that there are no safety standards applying to the evacuation of such tunnels, and that there is no precedent for such an interchange. The State must, therefore, undertake sufficient analysis and develop appropriate response plans for all likely contingencies that would halt traffic, require an emergency response or require evacuation.

The Concept Design's lack of detail raises questions about the exact implications for the local road network in this area when the M4-M5 Link opens. In particular what happens to the extra traffic on Anzac Bridge and along the Crescent from the induced traffic resulting from WestConnex? Further details are also required about the planned lane widths and speed on the Crescent and whether a noise wall along the City West Link Road has been considered.

The City is concerned that the project may require an upgrade of the Western Distributor. Modelling must be undertaken to demonstrate that the Western Distributor has capacity to accommodate increased traffic induced by the project without the requirement for future upgrades and without reducing the economic capacity of the adjacent land uses

The City does not support any traffic, intersection, lane number, width or speed upgrades of the Crescent and modelling must be provided to show that upgrades will not be required.

Noise modelling of sensitive receivers along the City West Link Road must be undertaken and mitigation measures identified.

The inclusion of the Western Harbour Tunnel stubs in Rozelle is premature given that the Western Harbour Tunnel is only in the early stages of planning with public consultation ongoing. The Western Harbour Tunnel stubs is a major addition to the motorway program of works and has not been included in the WestConnex Business Case and should not be included in the M4-M5 Link.

The Concept Design does not say what traffic analysis is being carried out, and by whom, nor does it address questions about capacity on Anzac Bridge, whether the M4-M5 Link will enable the removal of heavy vehicles from the City's local roads and, if so, how this will be enforced. If the M4-M5 does proceed the City will be requesting that the current heavy vehicle route be modified, with heavy vehicles being required to use WestConnex as a by-pass, thereby removing heavy vehicles in Botany, Wyndham, Abercrombie and Wattle Streets.

Recommendation

- The underground road network described in the Rozelle Interchange concept must be closely examined to ensure safety and appropriate emergency systems are in place
- Modelling must be undertaken to demonstrate that the Western Distributor has capacity to accommodate increased traffic induced by the project without the requirement for future upgrades
- There must be no traffic, intersection, lane number, width or speed upgrades of the Crescent and modelling must be provided to show that upgrades will not be required
- Noise modelling of sensitive receivers along the City West Link Road must be undertaken and mitigation measures identified

- The Western Harbour Tunnel stubs should not be included in the M4-M5 Link
- If the M4-M5 Link proceeds heavy vehicles must be required to use WestConnex as a by-pass

RESPONSE TO SECTION 14 – ACTIVE TRANSPORT NETWORK

In viewing transport as a network which includes walking and cycling, the WestConnex program of works must include full consideration of how active transport can best be incorporated into the overall project design. It is also imperative that the active transport network, as a key piece of the overall transport network is delivered. Should the M4-M5 Link be approved, the City will expect to see very clear details about how the active transport network will be delivered within the overall program of works. When developing this component of the project design, relying solely on connectivity to existing shared paths through parklands is grossly inadequate. Consideration of adequate provision for growth in the numbers of people walking and cycling is essential.

Provision of fully separated cycle ways in existing roadways within 1km of the project and designated as routes within adjacent Councils and State bike network plans will be expected.

The City has been working with RMS on the review of the Pedestrian and Cycleway Network and the Pedestrian and Cycle Implementation Strategy.

Recommendation

- The Active Transport Network must be delivered
- There must be adequate provision made for growth in the numbers of people walking and cycling
- Separated cycle ways within 1 km of the project, designated as routes within adjacent council and State bike network plans must be provided

RESPONSE TO SECTION 14 – ENVIRONMENTAL IMPACT STUDY

Generally, the Concept Design does not include comment on the impact on local environmental values relating to biodiversity impacts resulting from the M4-M5 Link. Rather, the public are referred to the EIS for a description of how environmental and community impacts including air quality, noise, vibration and traffic will be managed.

Also missing is any reference to the principles raised by the City in its review of the New M5 EIS. Given the paucity of information available, it is difficult to understand how habitat opportunities will be provided as it appears there are largely only thin tree plantings with a few water bodies being provided. The majority of cover on site appears to be primarily turf. It is concerning that the Concept Design contains no reference to the issues raised in the report commissioned by the City and Marrickville Council reviewing the Biodiversity Assessment Report prepared by Eco Logical Australia Pty Ltd for the New M5. A copy of the report reviewing the Biodiversity Assessment Report can be found at:

http://www.cityofsydney.nsw.gov.au/_data/assets/pdf_file/0005/250628/WestConnex-New-M5-EIS-Review-of-Biodiversity-Assessment.PDF

Recommendation

- The issues raised in the report commissioned by the City and Marrickville Council reviewing the Biodiversity Assessment Report must be considered and acted on

CONCLUSION

There is no compelling case for WestConnex and neither the New M5 nor the M4-M5 Link should proceed. The study as presented is so lacking in detail or justification that it would be improper to consider it a true public consultation document, it serves more as promotional material. The serious omissions must be addressed in any subsequent EIS.

The City proposes an alternative plan that starts with demand management to limit the infrastructure required, and then shapes the infrastructure to meet the Government's objectives for WestConnex. The M4-M5 Link will not provide a direct, fast or safe connection to Port Botany for freight or an effective design solution for Port Botany. Now is the time to integrate the planning, and rethink how an integrated transport solution can best be delivered with the greatest possible benefits and the least amount of community disruption and long-term harm.

The City requests that its alternative plan be comprehensively examined, and that an in-depth analysis of the long-term viability of Stage 2 and 3 of the WestConnex program of works be carried out.