

WestConnex M4 East Environmental Impact Statement

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City of Sydney submission to Department of Planning and Environment

Contents

Executive summary	2
Chapter 1: Introduction	4
Chapter 2: Assessment process	4
Chapter 3: Strategic context and project need	4
Chapter 4: Project development and alternatives	6
Chapter 5: Project description	7
Chapter 6: Construction	7
Chapter 7: Consultation	7
Chapter 8: Traffic and transport	7
Chapter 9: Air quality	10
Chapter 10: Noise and vibration	10
Chapter 11: Human health	10
Chapter 12: Property and land use	10
Chapter 13: Urban design and visual amenity	11
Chapter 14: Social and economic	11
Chapter 15: Soil and water quality	11
Chapter 16: Contamination	11
Chapter 17: Flooding and drainage	11
Chapter 18: Groundwater	11
Chapter 19: Non-Aboriginal heritage	11
Chapter 20: Biodiversity	12
Chapter 21: Greenhouse gas	12
Chapter 22: Aboriginal heritage	12
Chapter 23: Resource use and waste minimisation	12
Chapter 24: Climate change risk and adaptation	12
Section 25: Hazards and risks	12
Section 26: Cumulative impacts	13
Section 27: Sustainability	13

Executive summary

The City of Sydney does not support the WestConnex project. The strategic justification for the M4 East is weak and inconsistent with the NSW Government's strategic planning and policy framework. The evidence provided by the EIS in support of the M4 East is incomplete and unbalanced, selectively including and excluding impacts from subsequent planned stages of the WestConnex project. The analysis of strategic alternatives in the EIS is cursory and fails to demonstrate the M4 East extension is the best option.

WestConnex is Australia's largest ever tollroad project. The City is very concerned that no business case or holistic traffic modelling for the WestConnex project have been made publicly available, and environmental assessments are being done on individual stages in a way that does not consider the full impacts of the entire proposed project.

Impacts on the City of Sydney

While the M4 East extension is outside the boundaries of the City of Sydney LGA, it will have significant impacts on the City of Sydney and the especially the CBD. It will lead to increased private vehicle traffic travelling into the City along the two western CBD gateways – Parramatta Road and the Anzac Bridge - and will see an increase in the number of buses entering the city centre along Parramatta Road. However, there is no detailed assessment of the impacts on residents and businesses in central Sydney, and in particular the Sydney CBD.

The M4 East EIS assumes that by 2031 the full WestConnex project will be complete. This includes the New M5 and St Peters Interchange (Stage 2) and M4-M5 Link (Stage 3), both of which will have additional significant impacts on residents and businesses in the City of Sydney LGA, including some of Australia's fastest growing, and already congested, urban areas such as Green Square. Nowhere in the EIS are these impacts adequately considered.


Failure to assess the project

The M4 East project is described in Volume 1, Chapter 4. The Project under assessment does not include bus lanes on Parramatta Road or Stages 2 and 3 of WestConnex which are currently un-funded. Despite this the transport modelling scenarios presented in the EIS include these elements at 2021 and 2031, respectively. Therefore, the EIS does not present an assessment of the M4 East Project; that is, what would happen if the M4 was built without these other stages. This is a major failing that must be addressed.

WestConnex is presented as a 'transformational' infrastructure project, but no modelling assessment is provided beyond 2031. Additionally, the EIS refers to the additional stages of WestConnex in terms of the benefits they deliver in the context of the M4 East assessment, but does not consider the negative impacts.

Strategic justification for the project

The strategic justification for the M4 East appears to be the provision of an additional road connection to the city centre for workers travelling from the west. This ignores the evidence that of the seven per cent of western Sydney workers who travel to the CBD for work, approximately 89 per cent use public transport and would be far better served by improvements to those services. The M4 East will not benefit Western Sydney residents travelling to work by car as these trips are predominantly local and the M4 East is located well outside the Western Sydney area.



The strategic justification for the project is also inconsistent with the NSW Government's strategic planning and policy framework. The city centre is highly constrained with limited road space and parking. The CBD and South East Light Rail Project will further reduce road space, and the Government is consequently implementing measures to reduce bus numbers, peak traffic and reorganise road space in the CBD away from private parking towards priority uses such as freight. The City Centre Access Strategy reflects the fact that only 14 per cent of people commuting to the CBD during the peaks travel by car, and the proportion is falling.

The EIS for the M4 East makes it clear that this project is predicated on 'other WestConnex projects' including the Southern Gateway, Southern Extension and the Western Harbour Crossing. The M4 East will lock Sydney into a multi-billion dollar road building future.

Conclusion

The inadequacy of the M4 EIS is so profound that the City of Sydney does not believe it can be used as the basis for a ministerial determination as to whether the project should be approved.

Response to Environmental Impact Statement

Chapter 1: Introduction

No comments.

Chapter 2: Assessment process

Chapter 2 refers to Appendix B (Environmental Planning and Assessment Regulation 2000 (NSW) checklist). The checklist clearly identifies requirements of the EIS, including: *An analysis of the development, activity or infrastructure.*

The EIS does not present a full analysis of the M4 East (the Project). Both the 2021 and 2031 traffic assessments described fully in Chapter 8 include other infrastructure that is outside of the Project scope. In both cases the additional infrastructure (bus lanes on Parramatta Road in 2021 and the completion of the full WestConnex project in 2031) has a considerable impact on the assessment outcomes.

Chapter 3: Strategic context and project need

Section 3.1: The City is of the view that the WestConnex proposal is not compatible with the NSW Government's strategic planning and policy framework. The analysis supporting this view is contained in the *Strategic Review of the WestConnex Proposal* (SGS Economics and Planning, February 2015). This document is attached.

WestConnex locks Sydney into a road based transport future. Sydney's CBDs including Sydney CBD, are highly constrained with limited road space and parking. While WestConnex may increase the road space *between* centres, it will not make these centres more accessible to vehicles. Centres require high capacity transit, with available road space prioritised for public transport and economically important traffic, such as deliveries. WestConnex will not support the development of liveable centres.

Longer distance trips may be less likely to use Parramatta Road in the peak periods but the EIS indicates road congestion will continue and at some locations it will be worse following construction of the M4 East than it would have otherwise been. This will not make Parramatta Road a great place to live for existing and potential future residents. The failure in the EIS to fully consider public transport service provision on the Parramatta Road corridor, in particular the management of increasing bus services to and from the Sydney city centre, does not address the need to grow public transport patronage or develop well connected communities.

Section 3.1.8 makes reference to, and discusses the WestConnex Business Case. The WestConnex Business Case was endorsed by the NSW Government in September 2013. Since that time the WestConnex project scope and cost has changed considerably and new elements have been introduced, most notably the Western Harbour Crossing. An updated Business Case has not yet been released by the NSW Government. The quoted benefit cost ratio relates to a project with a different scope and cost to the WestConnex now presented and cannot be considered applicable.

Given the assessment of the proposed M4 East impacts in 2031 is reliant on the completion of Stage 2 (New M5), Stage 3 (M4-M5 Link), the Sydney Gateway and Southern Extension and possibly the Western Harbour Tunnel (Appendix G, page 4-6), all these elements of WestConnex must be subject to a full Business Case, which considers all costs and benefits. It is clear from the analysis of the traffic impacts (Appendix G) that the completion of future stages of WestConnex is identified as a mitigation strategy in considering the negative impacts of the M4 East including, for example:

'Prior to the opening of M4-M5, significant additional congestion is forecast at the Parramatta Road/Crystal Street intersection.' (Volume 1, page 11-5)

And:

'The proposed M4-M5 Link design is not yet finalised and yet to be endorsed. As a consequence, the functionality of a future CBD connection is not yet determined. Due to capacity constraints on the ANZAC and Sydney Harbour bridges the provision of this connection is not possible without an additional harbour crossing.' (Volume 2, Appendix G, page 4-6)

Section 3.2 considers why the project is needed. While the EIS makes reference to the unsuitability of public transport for *'a large proportion of travellers due to the diverse nature of employment and variety of purposes of travel'* (Volume 1, p3-12), no data is presented. Further, the EIS refers to the attractiveness of the Sydney CBD as a trip destination in the WestConnex modelling, a destination well served by public transport:

'There is a need to provide a link between Western Sydney and other centres in Sydney such as the Sydney CBD...' (Volume 1, page 3-14)

The City is particularly concerned about the ability of people to reach employment in the Sydney city centre and surrounding commercial areas such as Surry Hills and Ultimo-Pyrmont. Businesses in these locations rely on access to a large and diverse workforce and this workforce predominantly uses public transport. The Sydney City Centre Access Strategy (NSW Government, 2013) recognises the fact that 80% of people commuting to the city centre in the peaks use public transport with a further 6% walking and cycling. Just 14% travel by car, a proportion that has reduced from 17% in 2001.

As the M4 East EIS states, *'residents in Sydney's west are far more car dependent for work'* (Volume 1, page 3-14). However, the Western Sydney workforce is highly self-contained; only 30% of employed residents work outside Western Sydney, with just 6% of the Western Sydney workforce working in Inner Sydney (WSROC Community Profile (<http://profile.id.com.au/wsroc/residents>) accessed 21 October 2015). Analysis of Journey to Work data indicates 89% of people travelling from Western Sydney to employment in the Sydney CBD use public transport.

The M4 East will not benefit Western Sydney residents travelling to work by car as these trips are predominantly more local in nature and the M4 East is located well outside the Western Sydney area.

A view that suggests there will be an increase in car use for travel to work in the city centre in the future is contrary to current trends (see the Sydney City Centre Access Strategy, page 10) and does not recognise the capacity constraints on both road space and parking in the city centre. An increasing reliance on car use raises equity issues and would leave the workforce vulnerable to oil shocks and disruptions in the fuel supply. Without this workforce the Sydney CBD would be compromised with potentially national economic implications. There is an implicit assumption within the EIS that the current reliance on car travel should be maintained into the future. This is risky and unsustainable.

Section 3.2.4 considers freight, commercial and business services. The EIS makes assertions regarding the proposed Western Sydney Airport and its potential implications for the movement of freight around Sydney, concluding that:

Overall, the movement of freight around Sydney is not considered to be significantly altered by the introduction of the new airport, for the following reasons:

- *The operation of the of the proposed Western Sydney Airport would be staged, ramping up over time, with initial operations only commencing in the mid-2020s (a minimum of five years after the completion of the project)*
- *Freight arriving at the new airport would still have destinations across wider Sydney*
- *Port Botany and Sydney Airport would still be key freight entry and exit points, with the new airport to complement the existing airport.* (Volume 1, page 3-15)

The City considers these justifications to be weak. The recently released Western Sydney Airport Environmental Impact Statement indicates: *'Sydney Airport has limited ability to handle further passenger growth due to the physical constraints at the existing site. The limitations of existing infrastructure are becoming apparent at peak times and are expected to become more pronounced over the coming decades.'* (Western Sydney Airport EIS, Executive Summary, page 7)

The critical M4-M5 Link and Sydney Gateway connect the M4 East with Port Botany and Sydney Airport and will be completed much later than the M4 East. Until these connections are in place the M4 East does not offer a viable alternative to travel between Western Sydney, and the Port and Sydney Airport. The reference to a minimum of five years between the completion of WestConnex and the commencement of operations at Western Sydney Airport is incorrect; the actual gap is much less and may not exist at all.

Freight arriving at the new airport will have very different movement patterns to the freight arriving at Sydney Airport, given the considerable difference in origin/destination locations. Freight travelling to and from the Western Sydney Airport will mostly be concentrated on the roads serving the new airport.

Given the very recent release of a plan for the Western Sydney Airport and recognising the airport will operate without a curfew, the assumption that the role of the new airport will be limited appears premature.

In **section 3.2.6** (transport improvements in the Parramatta Road corridor) reference is made to the traffic reductions on Parramatta Road following the completion of the M4 East and *'other WestConnex projects'*. Throughout the EIS it is unclear what is included in these *'other WestConnex projects'*, but they seem to include the Sydney Gateway, Southern Extension and potentially the Western Harbour Crossing. Each of these elements of WestConnex are outside the current announced cost, subject to design, costing and a business case. The EIS is clear that any public transport benefits of the M4 East are only realised following much more extensive road building, that is, the completion of WestConnex, and as such the broader impacts of the further road building should also be made clear.

Chapter 4: Project development and alternatives

Section 4.1.4 (WestConnex and the M4 East) provides an outline of the WestConnex proposal in its entirety and the current status of other components of the project. The current status of the Western Harbour Tunnel, Sydney Gateway (to Port Botany and Sydney Airport) and the Southern Extension) are omitted.

This is an omission given the assessment of traffic and transport impacts (Appendix G) assumes these projects are in place by 2031.

Section 4.2 (Strategic alternatives) fails to fully canvas and explore the potential of strategic alternatives to a major multi-billion dollar motorway construction program. Each alternative is treated in isolation from the others when in reality an holistic future strategy would encompass elements of each *'alternative'*. For example; investment in public transport and the freight rail network (Alternative 3) should be accompanied by demand management (Alternative 4) to maximise the public investment in existing and new transport infrastructure. As described in the EIS, improvements to the existing arterial road network (Alternative 2) to relieve *'pinch points'* and congestion hotspots can be high value investments and may be complementary to Alternatives 3 and 4.

Demand management combined with investment in public transport could be particularly effective in reducing peak period commuter road use, freeing up road capacity for delivery and service vehicles. This improved use of existing road infrastructure by economically important traffic should be fully explored prior to pursuing a major program of road building at a high cost to taxpayers in NSW and across Australia.

The opportunities to expand rail freight do not appear to be fully considered given the development of the Moorebank Intermodal Terminal and the recently announced Asciano plan to build a \$100 million terminal at St Marys. There is excess rail capacity to move containerised freight to and from Port Botany and the viability of doing so will be enhanced by these new intermodal facilities in the future.

Chapter 5: Project description

The Project under assessment in the M4 East EIS is clearly defined in Chapter 5.

The Project does not include any reconfiguration of Parramatta Road, including the implementation bus lanes on Parramatta Road or any future WestConnex projects beyond the M4 and M4 East. This is at odds with the assessment of the Project in Appendix G. Appendix G does not provide an assessment of the Project impacts; in 2021 the M4 East is assessed alongside the reconfiguration of Parramatta Road and in 2031 the M4 East is assessed alongside the full WestConnex project.

The EIS does not present an assessment of the Project as required in the Secretary's Environmental Assessment Requirements (SEARs). The City cannot assess the impacts of the M4E on the City of Sydney LGA in the short term (2021) or the long term (2031) as they are not presented in the EIS as required. The EIS makes reference to increases in bus and general traffic travelling to and from the CBD due to the Project, changes in traffic volumes entering the City of Sydney LGA as a result of the project and increased congestion on the ANZAC and Sydney Harbour bridges, again as a result of the Project. These impacts are not presented with any clarity or detail.

Chapter 6: Construction

No comments.

Chapter 7: Consultation

No comments.

Chapter 8: Traffic and transport (including Appendix G: Traffic and transport assessment)

Chapter 8 and Appendix G do not provide an assessment of the future project impacts; in 2021 the M4 East is assessed alongside the reconfiguration of Parramatta Road and in 2031 the M4 East is assessed alongside the full WestConnex project.

In failing to assess the future operational impacts of the M4 East, the EIS is flawed and does not address the requirements of the SEARS, specifically:

'An assessment and modelling of operational traffic and transport impacts on the local and regional road network...'

In addition, while the EIS states there will be increased traffic flows on the ANZAC bridge and SHB, and that traffic will be attracted to CBD (Appendix G, page 4-6) and increased bus frequency on the Parramatta Road corridor facilitated by the M4 East (Appendix G, page 10-21) there is no detailed assessment of these impacts on residents and businesses within the City of Sydney LGA. There is no assessment of the impacts on central Sydney, and in particular the Sydney CBD. There is no consideration of how additional buses (outside the scope of the Project but identified as a benefit of the M4 East) will enter the CBD. This is in the context of the implementation of the City and South East Light Rail and the Government's objectives to reduce bus numbers and peak period traffic in the CBD as road capacity reduces. This message has been clearly articulated by the NSW Government through the 'Tomorrow's Sydney' campaign.

Section 8.1.1 (Determine existing and future traffic volumes) presents six modelling scenarios.

None of these scenarios presents an assessment of the Project. In both the 2021 and 2031 'do something' scenarios additional infrastructure, bus lanes on Parramatta Road and the full WestConnex project respectively, are included.

The **2021 'do something' scenario** does not assess the impacts of the M4 East given the inclusion of bus lanes on Parramatta Road which are explicitly excluded from the WestConnex project. The bus lanes reduce the available capacity of Parramatta Road and so will have an impact on the modelled traffic flows on Parramatta Road, but as the EIS states the bus lanes are not part of the Project, are to be delivered by others and will only be delivered after completion of the construction of the M4 East. The actual process through which the bus lanes will be assessed and delivered is not articulated in the EIS.

The **2031 'do something' scenario** includes multiple WestConnex elements that are beyond the M4 East EIS, including the New M5, M4 – M5 Link, Sydney Gateway and Southern Extension, and possibly the Western Harbour Tunnel. The Sydney Gateway connection between St Peters Interchange and Port Botany and Sydney Airport is currently subject to design and is uncosted. Similarly the Southern Extension does not to have been subject to design and costing. Investigations into the Western Harbour Tunnel are at an early stage. These additional projects are only presented in terms of the benefits they deliver in the context of the M4 East assessment – the assessment ignores the negative impacts and uncertainty of each of these projects.

In particular the M4-M5 Link and the New M5 will have direct impacts on the residents and businesses of the City of Sydney.

The EIS suggests the 2031 'do something' scenario assessment represents a '*cumulative traffic impact assessment for WestConnex*' (Volume 1, page 8-34). Given the very limited extent of the traffic study area this is clearly not the case and should not be presented as such. The M4 East EIS does not identify all the cumulative traffic impacts resulting from the WestConnex project.

WestConnex is presented as a 'transformational' infrastructure project, however, no modelling assessment is provided beyond 2031. The 2031 'do something' scenario, while flawed in its assessment of the M4 East Project, indicates significant impacts on the local road network, extending into the Sydney CBD. It is appropriate to consider the longer term impacts of the Project, say to, 2041.

Section 8.2. Figure 8-1 presents the traffic study area. This area of assessment is very limited, particularly given the Project is expected to attract traffic accessing the Sydney CBD. Reference is also made to future increased traffic on the ANZAC and Sydney Harbour bridges. No assessment of the impact of the project on the City of Sydney LGA is presented despite indications that there will be a future detrimental impact. The extent of traffic surveys (**Figure 8.2**) is similarly limited given the extent of impacts and assumptions around the completion of multiple stages of the WestConnex project by 2031.

Traffic reductions on Parramatta Road (Appendix G, page viii) are largely commensurate with the reduction in capacity as a result of the implementation of bus lanes (removing one-third of the lanes). While there are suggestions in the EIS that early traffic modelling established the feasibility of the bus lanes due to reductions in traffic flows on Parramatta Road, this assessment has not been included in the EIS. The EIS also contains conflicting statements suggesting the reduction in capacity due to the implementation of bus lanes reduces traffic.

Regardless, without an assessment of the M4 East in the absence of additional bus lanes on Parramatta Road, it is unclear to what extent the removal of capacity on Parramatta Road has resulted in traffic reductions. If these reductions in traffic are not achieved in line with the EIS, bus lanes will not be implemented. Public transport for those accessing the Sydney CBD for employment and other purposes will not be improved as a result of the Project.

Section 8.4: Assessment of operation aspects

Section 8.4.1: Road and intersection performance. The Project will only result in a reduction in traffic on some sections of Parramatta Road: the large reductions (around one-third) are achieved only in some sections. The reductions in traffic on Parramatta Road *'reflect the transfer of traffic to the M4 East and the reduction of capacity on Parramatta Road brought about by bus lane provision'* (Appendix G, page viii). If the bus lanes are not implemented it seems unlikely the traffic reductions on Parramatta Road will be realised.

The down-stream impacts of the Project are described; acknowledging that the road network beyond the Project, to the east, cannot accommodate the increased traffic volumes resulting from the M4 East, with resultant *'exit and merge issues'* (Volume 1, page 8-19).

The summary of intersection performance (Volume 1, page 8-25) is concerning. The EIS states: *a number of intersections have been assessed as presenting challenging conditions for the 'do something' scenarios* (Volume 1, page 8-25). The 2031 'do something' scenario includes the completion of multiple sections of WestConnex yet intersections in the study area remain congested with acknowledged impacts on bus travel times. This will have a detrimental effect on public transport servicing the city centre. There is no assessment of the potentially detrimental impacts on intersections and public transport beyond the limited study area.

Tables 8.9 – 8.12 highlight the limited nature of mid-block and intersection improvements that will result from the Project in 2021.

Table 8.14 highlights the benefits of the M4-M5 Link in 2031 in mitigating the impacts of the M4 East. The M4-M5 Link cannot be presented as mitigation for localised impacts resulting directly from the construction of the M4 East. The M4-M5 Link is still subject to detailed design. Information already available indicates there will be multiple connections to the road network west of the city centre. The M4-M5 Link must be assessed in its entirety, taking into account impacts and benefits. The M4 East must be assessed independently of other parts of WestConnex.

Travel times

The 'example' trips identified in Figures 8-4 and 8-5 (Volume 1) suggest the M4 East will result in considerable travel time savings for commuters. The trips that will particularly benefit have destinations in Sydney CBD and Surry Hills. Both these locations have highly constrained parking with little supply in excess of demand. In addition both Surry Hills and the Sydney CBD are well served by rail and future planned public transport improvements being delivered through the City and South East Light Rail and Sydney Metro. Employment growth in the Sydney city centre and surrounding commercial precincts will necessarily be supported by public transport improvements.

Analysis of the 2011 Journey to Work data (Bureau of Transport Statistics) indicates these trips are not representative. On Census day in August 2011, just 269 people from Penrith LGA indicated they worked in Surry Hills. Of these people, 208 (77%) caught a train to work. Only 37 people (13%) indicated they travelled by car.

The same data indicates that in 2011, 3,624 people lived in the Penrith LGA and worked in central Sydney. Of these 2,814 (78%) caught a train to work. Only 349 (10%) travelled by car.

The travel time savings as presented are misleading. The example trips shown are made by very few people and most of the people making these trips use public transport. These theoretical and large travel time savings will not be realised in practice.

Section 8.4.2: Public transport. Bus travel times presented show little reduction in the peak directions with the Project, despite the inclusion of kerbside bus lanes in the assessment. In 2021, the travel time saving due to the completion of the M4 East is under three minutes in the morning peak direction (Volume 1, table 8.15, page 8-31). In 2031, the equivalent travel time saving is just five minutes and three seconds, despite the assumed completion of the full WestConnex project.

It is unclear if the EIS takes full account of additional future bus services (mooted in Appendix G, Section 10.5) or the increase in population resulting from the Parramatta Road urban renewal project. Both of these factors would impact on future bus travel times and public transport access to the Sydney city centre for the existing and future residents.

Section 8.4.3: Pedestrian and cyclist facilities. The City of Sydney recognises cycling as a legitimate and efficient way to travel. In particular cycling complements other modes and can offer relief to congested roads and public transport services. Cycling to and from the Sydney CBD is to be encouraged given this the most congested part of the public and road transport networks. Cycling essentially frees up capacity for longer distance travellers and economically important freight traffic.

The M4 East EIS suggests '*cyclists can expect to benefit from... the ability to use the bus lanes on Parramatta Road which would be facilitated by the Project*' (Volume 1, page 8-32). The bus lanes on Parramatta Road (which are not part of the Project) will be carrying a high volume of buses, and will not offer a suitable cycle environment. The Project should look to deliver suitable separated cycle facilities, seamlessly connected to the Sydney CBD cycle network. Cycle facilities should be delivered as an integrated part of the Project.

Improvements to pedestrian facilities and the network are described in vague terms in the EIS. Creating a good pedestrian environment is also essential to realising the potential of the planned urban renewal in the Parramatta Road corridor.

Chapter 9: Air quality

The City of Sydney notes that the Project will induce increased traffic and as such will reduce air quality locally to the project and across much wider areas of Metropolitan Sydney.

Chapter 10: Noise and vibration

No comments.

Chapter 11: Human health

No comments.

Chapter 12: Property and land use

No comments.

Chapter 13: Urban design and visual amenity

No comments.

Chapter 14: Social and economic

The economic and social impact study area (Volume 1, Figure 14.1, page 14-4) is very limited in its extent. Given the Project objectives include; ‘*Support Sydney’s long term economic growth...*’ and in the absence of an up to date Business Case, it is essential this analysis is broadened to assess impacts on the Sydney city centre, Australia’s most important business centre. The Project will impact the Sydney city centre and is vital these impacts are assessed and mitigated if the Project is to proceed.

Chapter 15: Soil and water quality

No comments.

Chapter 16: Contamination

No comments.

Chapter 17: Flooding and drainage

No comments.

Chapter 18: Groundwater

No comments.

Chapter 19: Non-Aboriginal heritage

The approach to the significant loss of heritage items through the construction of the Project sets a highly concerning precedent, particularly given the assumed completion of future stages of the WestConnex project.

For example, the Haberfield Conservation Area is described as:

The first successful comprehensively planned and marketed garden suburb in Australia... It is significant in the history of town planning in NSW... It is significant in the history of Australian domestic architecture for its fine ensemble of Federation houses and their fences, and shops, most with their decorative elements intact. It is outstanding for its collection of modest Federation houses... Haberfield is a major research repository of the Federation era, garden design and plant material, architectural detail, modest house planning, public landscaping and utility provision. (Volume 1, page 19-30)

The EIS states the Haberfield Conservation Area will suffer partial demolition with a major adverse impact on its heritage qualities. Within the Conservation area 53 dwellings will be demolished and two of the suburb’s intact and tree lined streets will be affected. (Volume 1, page 19-41)

The loss of European heritage items and areas due to the construction of the M4 East has impacts that go well beyond the very limited project study area. As the EIS acknowledges the Haberfield Conservation Area has state and potentially national significance.

As stated, this lack of respect of our collective heritage in pursuing WestConnex is highly concerning.

Chapter 20: Biodiversity

The City is concerned that WestConnex will result in a cumulative detrimental impact on biodiversity over time through the reduction of available habitat, reduction of habitat connectivity and the further fragmentation of remaining habitat. The assessment of the cumulative impacts on biodiversity (Volume 1, page 26-10) is very brief and as a result weak.

Chapter 21: Greenhouse gas

The EIS calculates future GHG emissions based on outputs from the traffic modelling as described in Chapter 8. As discussed, the modelling is flawed as none of the future scenarios listed assess the M4 East Project. The assumed bus lanes on Parramatta Road reduce road capacity and therefore traffic on Parramatta Road. The bus lanes are not part of the Project and should be excluded from the assessment.

Section 21.4.2 addresses emissions from vehicles during operation and states that the project will reduce overall traffic emissions to 2031. In stating that fuel efficiency is anticipated to improve, the analysis overlooks the known fact that building more, high capacity roads encourages greater car use and facilitates ongoing development of residential, commercial and industrial development that is poorly serviced by public transport options. The Project may temporarily reduce congestion in some areas, but it will inevitably increase traffic volumes if significant and systematic investment in public transport does not accompany it. Despite setting out apparent short term emission savings through the reduction of congestion along the existing Parramatta Road corridor. It is misleading to over-emphasise the long-term emission savings delivered by the M4 East and WestConnex as a whole.

Chapter 22: Aboriginal heritage

No comments.

Chapter 23: Resource use and waste minimisation

No comments.

Chapter 24: Climate change risk and adaptation

The climate change risk assessment has followed a conventional risk methodology. It captures the likely risks for the project itself, however it does not address the complexity of likely interdependent risks. As a piece of linear infrastructure, the M4 East will not operate in isolation of other infrastructure systems and networks. Not addressing this interdependence is an oversight.

For example, the assessment of flooding impacts on the M4 East does not consider flooding of feeder roads and alternative routes, which will likely have major knock-on impacts on the operations of the tunnel, even if the M4 East itself is not flooded. Similarly, impacts on local energy, storm water, sewer, telecommunications and public transport will all have a bearing on the operation of the M4 East.

Section 25: Hazards and risks

No comments.

Section 26: Cumulative impacts

The EIS describes a range of cumulative impacts that may exist. These include, '*impacts on local, regional and State traffic and transport and road users*'. (Section 26.1, Volume 1, page 26-1)

The EIS suggests these impacts have been assessed as the EIS has assumed all components of WestConnex are completed by 2031. The EIS fails to identify impacts beyond the very small study area of the M4 East. The EIS does not, for example, consider impacts on the Sydney city centre despite making it clear there will be congestion issues on the ANZAC and Sydney Harbour bridges, bus numbers using Parramatta Road and entering the city centre will increase and traffic will be attracted to the CBD as a direct result of the Project.

The discussion on cumulative impacts does not recognise that the construction of the M4 East and M4-M5 Link will increase pressure on the ANZAC and Sydney Harbour bridges to the extent an additional road crossing, the Western Harbour Tunnel, will be necessitated (Volume 2, Appendix G, page 4-6).

Section 27: Sustainability

The EIS takes a very narrow view of sustainability despite acknowledging the precautionary principle and inter-generational equity. The construction of the M4 East locks Sydney into a future of major road building, with the EIS assuming construction of future components of the WestConnex project and also the Western Harbour Tunnel. The M4 East project will not deliver improvements to Sydney's public transport network. The analysis of strategic alternatives (Chapter 4) fails to take into account long-term, metropolitan wide sustainability based on the precautionary principle and inter-generational equity.