Submission to: Planning Services

Department of Planning and Environment GPO Box 39, Sydney, NSW 2001

Attention: Director – Transport

Assessments

Application Number: SSI 7485 Application

Name: WestConnex M4-M5 Link

Name: NoWestConnex Annandale Group

Signature:

Please include / delete (cross out or circle) my personal information when publishing this submission to your website. **Declaration:** I HAVE NOT made any reportable political

donations in the late 2 years.

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We object to the Westconnex M4-M5 link proposals in the 'Indicative Only' EIS for the following reasons and call on the Minister of Planning not to approve it.

The introduction of the EIS clearly states that the information in the EIS is "indicative of the final design only. The reality of this statement means that the project may be completely different to stated plans in the EIS. Furthermore although the EIS indicates what is to be expected when construction begins, it also states that only after Construction Contractors have been engaged would project designs and methodologies be finally worked out and agreed upon. This may result in major changes to the project design and construction methodologies. The community would have no say in this process.

- 1. The Concept Design was a woefully inadequate document totally devoid of any real depth of detail in terms of maps, scales, distances with only vague suggestions and glamorized Artist's Impressions of an idealized view of what Stage 3 would be like. It was another example of current city planning documents that consistently accentuate huge areas of tranquil green spaces with families and children out walking and riding bicycles in idealized parks and suburbs. All this is total PR spin and bears no reality about the real outcome of the build. It bears no reality as to what Stage 3 of Westconnex will be like.
- 2. The EIS was released just 12 days after the closing date for submissions to the Concept Design. This categorically proves that all the Community Consultations and Submissions to the Concept Design were a total sham. There were at least 800 posts on the interactive map. These were limited as the community only had 140 characters available to make their point which was woefully inadequate. But there were at least 1500 written submissions, some of which were highly detailed and of considerable length. There is no way that all these submissions could have been read, considered, their arguments integrated into the EIS and then for the EIS of 7200 pages to be put together, printed and released 12 days after the the closing date for submissions to the Concept Design There needs to be a major investigation into this flagrant abuse of the way NSW planning laws have been flouted for the whole of Westconnex and particularly Stage 3.
- 3. Rozelle Rail Yards and Rozelle Civil Site. It is clear that the most highly affected area of Stage 3 will be the Rozelle area and the massive and hugely complex Rozelle interchange. The suggestion that Westconnex is capable of building this is highly questionable. Nothing like this has been built anywhere else in the World. Considering the simple problems of dust management, noxious gasses and the handling of toxic materials like asbestos that have been so inappropriately dealt with on Stages 1 and 2 by Westconnex this intersection of Stage 3 is a disaster waiting to happen and should definitely not be allowed to proceed without a massive investigation. What has been shown in the EIS is totally inadequate for this project to be allowed to proceed.
- 4. In the EIS there are indications of what is to be expected in the Rozelle Rail Yards construction site and the Crescent Civil site. But the EIS states that only after Construction Contractors have been engaged would project designs and methodologies be finally worked out and agreed. This may result in major changes to the project design and construction methodologies. The community will have no input into this process, so the community is totally powerless to be able to comment on what will actually be proposed, how it will be carried out and what will finally be built. This is not acceptable.
- 5. In the EIS the Rozelle Rail Yards will have 400 car parking spaces for workers. There will be no car parking spaces at the Crescent Civil site. The daily workforce for these sites is stated to be approximately 550. This means that there will be approximately 150 additional vehicles that will not be able to park in the Construction sites on a daily basis. The EIS suggests workers use public transport. If not, they will have to park on local streets in the area. Parking is already at a premium in the surrounding suburbs and is worsening all the time

with the success of the Light Rail and out of area commuters daily leaving their cars at the light rail stops. It is totally unacceptable that the local streets accommodate constructors extra vehicles on a daily basis for the construction period of 5 years in an area where parking is already at a premium.

- 6. The EIS shows that traffic on the City West Link, Johnston St, the Crescent, Catherine St and Ross street will greatly increase during the construction period and also be greatly increased by the time Stage 3 is completed. It states that Stage 3 will do nothing to improve traffic congestion in the area in fact it will add to the problem. Many of these areas are already congested at Peak times. This will be highly negative for the local area as more and more people try to avoid the congestion by using rat runs through the local areas on local streets.
- 7. There will be 5 entrances/exits to the Rozelle Yards site off Lilyfield Road for light vehicles and 2 entrances/exits for Heavy vehicles off the City West Link. The 2 entrances on the City West Link, one opposite the exit of the Crescent and one 400 metres further West on the City West Link will have to have traffic controls set up to allow trucks to access and exit. This will lead to a big increase in congestion in this area, the main route to Anzac Bridge and Victoria Rd.
- 8. The removal of spoil at the Rozelle Rail Yards will lead to the largest amount of Spoil truck movements on the entire Stage 3 project: 517 Heavy truck movements a day, of which 46 are stated to take place at Peak hours. There will also be 10 Heavy truck movements a day from the Crescent Civil Site. The sheer number of trucks on the road will lead to massive increases in congestion. Maps in the EIS have the spoil trucks going to and from these sites from the Haberfield direction on the City West Link. This is also the direction that is being proposed for spoil truck movements from Darley Rd which is said to have 100 Heavy truck movements a day. It is stated that the cumulative effect of truck movements from all sites on the City West Link will be 700 (one way) Heavy truck movements a day and of that 208 will be in Peak hours. This plan totally lacks credibility.
- 9. It is stated that if congestion proves to be a problem then other solutions will have to be found. Other routes that are being considered will be using the Western Distributor, the Crescent, Victoria Rd, Ross St, Pyrmont Bridge Rd and Johnston St. The Crescent and Johnston St are clearly going to be used. This despite the fact that in a consultation those representing Westconnex assured residents of Annandale that neither Johnston St or Booth St would be used. It is expected that these routes will also be used for night transport. It is clear that it is unlikely that transportation routes shown in the EIS will be adhered to. This is unacceptable.
- 10. The EIS states "that without the 'construction scenario' the City West Link/The Crescent and The Crescent/James Craig Road intersections are forecast to operate satisfactorily at LoS D or better in both Peak periods. With the 'construction scenario' the operational performance at the intersections is forecast to worsen". And after 5 years of construction and the spending of more than \$18 Billion the outcome at these locations will be worse.
- 11. The City West Link Eastbound AM and PM peak hour and other locations. "Table 7-19 shows that several locations are forecast to exceed theoretical roadway capacity with the increased background traffic and the construction traffic in the 2021 AM and PM peak hours. However, traffic on the majority of these roads would exceed their theoretical capacity even without the construction traffic, simply due to the growth in background traffic". So in the full knowledge that this area will be at capacity in 2021, massive amounts of construction traffic are going to be added for the whole construction period of 5 years. Even on completion it is stated in the EIS that traffic will be worse in this area than 'without the project'. This categorically shows that the planning of Westconnex is totally inadequate and needs major changes. It also shows that when completed Westconnex will not work. It is abundantly obvious that Rail/Metro is the only option to radically overhaul Sydney's failed transport systems.
- 12. The EIS states that by 2033 Ross St will see an increase of 80 heavy vehicles a day at Peak periods. The greatest increase of Heavy vehicles at the PM peak will be in Johnston Street, which will see an increase of about 30-50 vehicles when compared to the 'without project' scenario. At Catherine St there will be an increase of 30 heavy vehicles a day at Peak periods. These streets will see a huge increase in Heavy vehicle movements if Stage 3 is built. The increase would be roughly half this amount if the project did not go ahead. Annexure Fig 26 B2 Section H.

- 13. The proposed work hours for the Rozelle Rail Yards are tunnelling and spoil handling 24 hours a day seven days a week. Civil construction Mon Fri 7.00am 6.00pm, Sat 8.00am -1.00 pm. There will be no night work at The Crescent Civil Site and the daytime hours are stated to be the same as at the Rozelle Rail Yards. However as has been experienced by those at Haberfield and St Peters these hours and especially late and night work have been extended and implemented when the schedule has fallen behind and this has lead to physical and mental stress for many residents through interrupted sleep and loss of sleep especially with children. The roads and sites at night in the area will see a marked increase in noise from truck movements, truck reversing alarms and running machinery. It will also see a marked increase in light during the night hours with site illumination and vehicle head lights as has been experienced in other areas. These problems have not been properly addressed and are not adequately dealt with in the EIS.
- 14. Many homes around the Rozelle Rail Yards and the Crescent Civil site will be noise affected, some will be highly noise affected. The expected duration of the cumulative works is 120 weeks, almost 3 years, when noise impact will be significant so it is essential that maximum noise mitigation measures are put in place. However the EIS contains only vague details of how mitigation will be carried out. There is no requirement that measures will in fact be carried out to address noise impacts. The approval conditions need to contain specific noise mitigation measures, that can be mandated and enforced. Areas that will be particularly highly noise affected are Bayview Crescent and Railway Parade, the Northern end of Rail Yard site and sections of Lilyfield Rd, Hornsey St, Quirk St and Robert St. Given their proximity, receivers located along Lilyfield Rd between Victoria Road and Gordon St which overlook the Rozelle Yards are likely to experience the greatest construction noise impact within the whole Rozelle area.
- 15. There will be increases of noise in the area of Johnston St where traffic volumes will increase. Residents will be more susceptible to health impacts associated with increased noise. In the EIS it is stated that residents may have to keep their windows closed. They may well experience sleep disturbance and interference of living activities like eating outdoors. However the EIS considers this to be only moderately negative. This is not acceptable.
- 16. The mainline tunnel alignment was influenced by a number of factors between Haberfield and St Peters. It is very concerning that one of these factors, states that this route was decided on for: "Future connections to the motorway network". This is of particular concern in the light of the Camperdown interchange removal. Westconnex was forced to remove this interchange due to pressure from the RPA Hospital, Sydney University and The Chinese Embassy. Knowing that the Camperdown Interchange was wanted it is highly concerning to see this reference to future motorway connections but no disclosures outlining where these connections maybe. The EIS also states that in 2016 extending a tunnel link to the South side of the Gladesville Bridge was seriously considered rather than to the Iron Cove Bridge but this was shelved due to costs. In light of the way residents and home owners have been dealt with by Westconnex the fact that other areas are being considered for add on sectors to this project is of great concern.
- 17. There are two areas in the Rozelle Rail Yards site where construction will be by cut and cover. These are the Portals for the Western Harbour Tunnel and the Portals for the M4/M5 link. This is of particular concern in the light of residents experiences in areas of Haberfield and St Peters where highly contaminated land areas were being disturbed. There was totally inadequate control of dust in these areas, where the dust would have been loaded with toxic chemical particulates. The old Rail Yards are highly contaminated land from their past use. The EIS gives no specific details of how this highly toxic threat is going to be securely managed. It is not acceptable for this to be decided only when the Construction Contracts have been issued, when the community will have no say or control over the methodology to be employed for removing vast amounts of contaminated spoil.
- 18. The Rozelle Rail Yards site is the location of 3 Unfiltered Pollution Stacks. There is a fourth stack on Victoria Rd close to Darling St. If the Western Harbour Tunnel is built there will also be a total of 7 Tunnel Portals. Tunnel Portals are also areas of high levels of pollution. It is totally unacceptable that the Pollution Stacks are unfiltered. In 2008 Gladys Berejiklian said of Labor "It's not too late, the Government can still ensure that filtration is a possibility. World's best practice is to filter tunnels. Why won't Labor allow people to sleep at night, knowing their children aren't inhaling toxins that could jeopardize their health now or in the future." It is totally unacceptable that the tunnels will not be filtered. Recently built tunnels in Tokyo successfully filter 98% of all pollutants.

- 19. Motor vehicles account for 14% of Particulate Pollution of 2.5 microns and less in Australia. There is no safe level to exposure to particulate matter of 2.5 microns and less. Particulate matter is linked with Asthma, Lung Disease, Cancer and Stroke.
- 20. Heart disease will skyrocket due to air pollution caused by Westconnex bringing more cars into the Inner West says Paul Torzillo, Head of Respiratory medicine at Royal Prince Albert Hospital. Inner West Courier 23rd May 2017.
- 21. The Health costs of outdoor Air Pollution in Australia are up to \$8.4 Billion a year. The Health costs of Particulate Pollution in the Sydney Greater Metropolitan area is around \$4.7 Billion a year. With no filtration on the Westconnex tunnels these Health costs will rise substantially.
- 22. The EIS shows a diagrammatic explanation of the way the polluted air will be expelled from the Westconnex tunnels. This method will work on straight tunnels of short distance providing there is no traffic congestion. There are already signs in tunnel locations in Sydney advising motorists to roll up their windows and put on their 'in vehicle circulating' air conditioning. This type of straight line pollution expulsion doesn't work if the tunnels go around corners, which is the case with the tunnels from the Rozelle Rail Yards site.
- 23. The tunnels under Rozelle/Lilyfield are going to be in three levels. The EIS does not explain what safety procedures are being built into the project to deal with situations like serious congestion, accidents or fire. With a serious hold up on the deepest of these tunnels it is clear that the air quality will very quickly become toxic unless substantial air conditioning is a major part of the design. There is no in depth detail about how these issues are going to be addressed. This is not acceptable.
- 24. The three Pollution Stacks in the Rozelle Rail yards are shown to be 38 meters high. This is a totally inappropriate location for these Pollution Stacks. The Rozelle Rail Yards are located in a valley. The Stacks will be on land that is approximately 3.5 meters above sea level. Balmain Road between Wharf Rd and Victoria Road is at an elevation of on average 37 meters. Orange Grove Primary School is at an elevation of 33.4 meters. Areas of Hornsey Rd Rozelle are at 28 meters. Around the junction of Annandale St and Weynton St in Annandale the height above sea level is 29meters. All these areas are in close proximity to these stacks. All the pollution being exhausted from these stacks will almost be on the same level as these locations and so will be blowing almost directly into these properties, especially in summer when many windows are open. This is not acceptable. In situations of no wind the pollution will accumulate in this valley area and make the surrounding area highly polluted. This is not acceptable. There are also at least 4 schools of Primary age children well within one kilometer of these Stacks. Young children are the most vulnerable to pollution related disease.
- 25. The Rozelle Rail Yards are a totally inappropriate area to create a new recreational area because the area will be highly polluted by unfiltered Pollution Stacks and Tunnel Portals. In the EIS it is referred to as an idealized area. "It is envisaged that the quantum of active recreation within the Rozelle Rail Yards would be further developed by others as projects such as The Bays Precinct are developed. The concept plan provides spaces that could include an array of active recreation opportunities and even community facilities such as gardens or a school." The suggestion that this would be a suitable location for a School is just beyond belief and demonstrates that those who have put these plans together are either staggeringly ignorant or totally delusional! At a time when major World cities are doing all they can to address the dire problems of pollution this is an appalling suggestion that is totally out of touch.
- 26. The management of water in the Rozelle Yards is of great concern as the site is highly contaminated and the construction work that will be carried out will cause a great deal of disturbance especially once vegetation has been removed. There will be potential impacts from contaminated soils, leakage/spills of hydrocarbons and other chemicals from machinery, vehicles transporting spoil adjacent to roads and stormwaters, rinse water from plant washing and concrete slurries. Water from tunnelling activity and other works will also introduce contaminants. The EIS says that much of this water will be treated in temporary treatment facilities and sediment tanks before being released to Whites Creek and Rozelle Bay. The EIS does not disclose what levels of pollution controls will be implemented to make sure that contaminated water is not released into White's Creek or Rozelle Bay. This is not acceptable.

- 27. Land Subsidence in the areas of all tunnel routes is of great concern to all residents. This is of especial concern in the Rozelle /Lilyfield area where there are layers of tunnels. There is likely to be ongoing and considerable subsidence even when the tunnels are built due to the ongoing necessity to remove ground water from the tunnels. This will lead to a slow drying out of the sandstone and hence settlement.
- 28. Generally the risk of settlement is lessened where tunnelling is more that 35m. In the Rozelle area the tunnel will be at 30m in the Brockley St & Cheltenham St area, and it will be less than that in the Denison St area. Also it is planned to have another layer of tunnels above that in the Denison St area. From the cross section diagram Vol 2B appendix E part 2 the suggestion is that this higher level of tunnels will be at no more than 12m. This is of major concern. Numbers of people in the ongoing construction of Stage 1 and 2 have suffered extensive damage to their homes costing thousands of dollars to rectify caused by vibration and tunnelling activities and although they followed all the elected procedures their claims have not been settled. This is totally unacceptable. There is nothing addressing these major concerns in the EIS.
- 29. The widening of the Crescent between the City West link and Johnston St with an extra lane being constructed will lead to heavy traffic congestion. This will be exacerbated still further by extra traffic light control cycles being incorporated into the signaling at both Johnston St and at the City West Link, with the inclusion of an extra traffic light control 400m West from the Cresecent / City West Link junction to manage the movement of large numbers of spoil trucks.
- 30. It is clear from the EIS that spoil truck movements will not be confined to the City West link. At a community consultation it was revealed that trucks removing spoil at Camperdown would very likely be travelling from the James Craig Rd area and in that case would be using the additional lane on the Crescent and then turning right up Johnston St. This is totally CONTRARY to what concerned residents had been promised would not happen. It is clear that any assurances given to the community in past consultations are totally disregarded without consultation later. This is unacceptable.
- 31. Along with the widening of the Crescent at Annandale the White's Creek bridge is to be rebuilt. This will mean that the road in this area will be reduced in width as first one side of the bridge is rebuilt followed by the other. Added to the additional volume of trucks from the Rozelle Rail Yards, the Crescent Civil site and the Camperdown site this is going to lead to massive congestion on Johnston St and all along the Crescent towards Ross St and make it virtually impossible for residents to exit and return to their local area. It is most likely that the commercial sectors of the Tramsheds development will be badly affected.
- 32. The removal of Buruwan Park between the Crescent and Bayview Crescent/Railway Pde Annandale to accommodate the widening realignment of the Crescent would be a particular loss of badly needed parkland in this Inner City area. Currently we have fewer parks than almost any suburb in Sydney so this would have a direct impact on local people. Buruwan Park also lies on a major cycle route from Railway Pde through to Anzac Bridge, UTS and the CBD. The alternative route being suggested is poor and takes no real account of trying to encourage cycling as a mode of transport. Cycling should be made as easy as possible to get more ordinary commuters to bicycle and the alternative to the current level route directs cyclists to Johnston St and then up Bayview Crescent arguably the steepest road in Annandale.
- 33. One of the main reasons for establishing Buruwan Park was as a relatively quiet nature corridor for wildlife not for successions of children's parties so the assessment of this area in the EIS is entirely blinkered and inaccurate. The Rozelle Rail Yards site that may appear to development driven planners as an unattractive and wasted eyesore is ironically a very important nature reserve. It is perhaps the only area in the Annandale/Glebe area were Fairy Wrens can be found because of the substantial bush cover. This is very important as where these birds are found nature tends to be in balance which is not the case in parks like Easton Park and Bicentennial Park.
- 34. 2 G Appendix P Table 5-27 of the EIS states that 43% of the Leichhardt- Glebe Precinct travel to work by Car, 21% by Bus and 5%by Rail. These are figures for 2011. These figures are being used to promote the project and suggest they are accurate today. In the case of Rail these figures are extremely questionable. The Light Rail is now hugely popular, it's use having grown enormously. It is travelling at full capacity at Peak hours. More services are being put in place. Apartment blocks are being built as close to the Light Rail corridor as possible. Residents see the Light Rail as an efficient, reliable and timely method of commuting to work. It is blatantly obvious that the Govt should be investing heavily in building and extending Light Rail, Metro and Rail.

If this were pursued in a professional manner the necessity for trying to hoodwink the community into believing that Westconnex were needed would be totally unnecessary.

- 35. The EIS states that the Rozelle interchange and the surrounds of the Anzac Bridge are currently close to capacity. With the proposed project construction the area is going to be subjected to a huge increase in vehicle movements throughout the area for 5 years. Even the 'with project' scenario states that this area will experience no improvement and if anything the current situation will be worse. This is totally unacceptable and proves that the whole project is a complete White Elephant. Indeed it is stated in the EIS that the only way to mitigate for this situation by 2033 is for the working population to adjust their work hours. "Due to forecast congestion, some of this traffic is predicted not to be able to start or finish their journey within the peak period. Some drivers will therefore choose to make their journey either earlier or later in the peak period to avoid delay. This behavior is called 'peak spreading'..." This is a categorical admission of failure of this complete project and a stupendous waste of Tax Payers money.
- 36. In 2033 with the M4 M5 link the WRTM is forecasting reductions in peak travel times between the M4 corridor and the Sydney Airport/Port Botany area. The times savings that are quoted are miniscule! Between Parramatta and Sydney Airport the time saving is 10 minutes. Between Burwood and Sydney Airport the time saving is 5 minutes. Between Silverwater and Port Botany the time saving is 10 minutes. So for well over \$20Billion all that can be saved is just a handful of minutes! This total waste of public money is completely unacceptable.
- 37. Before the issuing of this EIS, work had already begun on clearing the Rozelle Rail Yards site. There has been growing consternation and concern in the community which has been raised in State Parliament that the removal of the freight lines at this site constitute 'Public Transport Sabotage' and that the sole purpose of this move is to remove any chance of a Public Transport corridor being retained for future transport use that could so easily and relatively inexpensively be used to service a large part of the Balmain Penisular and so radically improve the level of future congestion which is already at a totally unacceptable level. There is absolutely no valid argument to support what has been allowed to take place at this site. The only possible conclusion that can be made is that this is a totally corrupt decision made by vested interests with the connivance of the current NSW Government. The EIS should have categorically stated that a Public Transport Corridor was being retained through this area for future public transport use. What has happened is totally unacceptable.
- 38. Recently Andrew Constance has been quoted numerous times promoting his vision of the transport future and some of these views are aired in the EIS but the vision put forward is highly visionary with no practical detail addressing how these changes are going to be brought about and so they are totally unrealistic. For example it is starting to be commonly accepted that car manufacturers will be reducing production of petrol/diesel cars before 2040 probably starting in 2030. It is proposed that electric cars will then take over. It is suggested that cars will be charged over night at people's homes. Virtually no one in the Inner City Suburbs has a garage. Are all the streets throughout all the suburbs going to be fitted out with charging points outside all the houses, similar to parking meters? We have all watched the shambles of the rolling out of the NBN it would be mind blowing to watch what would happen with the rolling out of charging points to each household without a garage and it would take years to achieve. There are virtually no recharging points at any Fuel Stations anywhere as yet and to set these up will take years. A large part of the population run older cars, because that is all they are able to afford. It will take many years for these petrol/diesel cars to disappear. Andrew Constance has also said that when everyone is driving an autonomous car average speeds will be reduced but as they are not being controlled by individual drivers this will mean they will be able to travel much closer together and so there will not be so much delay caused by spread out congestion. If this is to be so perhaps the suggestion could be made that some mechanism could be employed which would enable these cars to link together; if that could be done then they could form -a TRAIN - and then really travel at speed!
- 39. In the SMH Oct 12th it says that the Rozelle Interchange is now not going to be built as it is shown in the design plan in the EIS for Stage 3 but no details of what is now going to be built are provided. I demand that the Rozelle Interchange be taken out of this EIS. If this EIS is approved as it currently stands including this now not to be built design it would mean that anything can be built instead of the Rozelle Interchange as it has been presented to the public, and the community will have had no opportunity to revue or object to what is being considered. This is completely unacceptable. If this EIS is approved in it's current form it will be a totally corrupt abuse of the legal requirements for planning approvals. It should be open to legal challenge. I demand

that the Minister of Planning does not sign off on this EIS and another EIS is prepared either excluding the Rozelle Interchange entirely, or a new EIS is prepared showing exactly what the design will be for what is to be proposed for the interchange construction in Rozelle.