



Submission to the M4-M5 Link EIS (SSI 16_7485)

Haberfield Public School P&C Association

October 2017

This submission is made on behalf of the Haberfield Public School P&C Association, which represents the parent and carers of the 650+ students at Haberfield Public School and other members of the school community.

Our community objects to the M4-M5 Link development plans outlined in the Environmental Impact Statement due to the effects on the Haberfield/Ashfield/Five Dock communities. We object to all ongoing work in Haberfield and Ashfield beyond the M4 East project. We further and particularly object to the specific plans proposed in the EIS and most particularly to proposed Option B.

The plans will cause significant detrimental effects for our children's health, safety and learning environment and for our community.

We request the Department of Planning not approve the EIS in its current form.

Objection to the project as a whole continuing to impact Haberfield/Ashfield

Our community has already suffered serious consequences as a result of the M4 East stage of WestConnex.

- Families of students at Haberfield Public School were among the many residents whose homes were acquired and demolished to make way for massive roads of eight or more lanes that have literally split our community and damaged community cohesion.
- Many school families live near the construction sites (including at Wattle St/Walker Ave, Northcote St, and along Parramatta Road) and suffer daily from unacceptable levels of noise, dust, traffic and parking congestion caused by WestConnex development and associated utilities work.
- Our children must now take buses to sporting events they used to walk a short distance to because of the disruption caused by construction in the neighbourhood. Families have to pay for these buses.
- The school and the Education Department is now taking steps to monitor the impact of increased dust levels on children's respiratory health.

We strongly believe the M4-M5 Link stage, as proposed, will exacerbate these adverse impacts on our community and pose a threat to our children's education. With construction stretching from 2016 to 2023 in the Haberfield/Ashfield area, hundreds of students will be affected by disruptive WestConnex works throughout their entire primary school education.

In discussing the latest EIS with parents in our community, it is clear that most feel entirely disempowered by the process. They objected to the M4 East and believe their concerns were ignored. Many are distressed by the proposals and feel powerless to influence them. In turn this



impacts on the mental health of the community (with studies consistently showing that stress is significantly increased when people have no control over the stressor).

In addition, most in our community were unaware the M4-M5 Link would impact us so significantly - we understood that after the M4 East, the work would move out of Haberfield to affect other communities instead. We had no idea that the effects of the M4-M5 Link would be even more catastrophic for the school.

This submission is divided into two parts – our objections to Option B in particular, and our objections to the plans outlined in the EIS in general.

Objections to Option B

The Haberfield P&C Association is strongly opposed to Option B, the choice of two construction plans that significantly affect the Haberfield/Ashfield community.

The community of Haberfield Public School believes it is completely inappropriate, and not in the public interest, for a construction site for Australia's most significant road project to be located less than 200m from a large primary school where more than 650 students are moving to and from the school every weekday. We call on the Planning Department to reject Option B outright. Option A, being the alternative combination of construction facilities presented in the EIS, would utilise existing construction areas which are located away from sensitive uses including schools and day care centres and presents a far safer option with materially less impacts.

Specifically we object for the following reasons:

1. Noise

Under Option B, the Parramatta Road West civil and tunnel site is proposed to include tunnel excavation as well as stockpiling of excavated material and spoil haulage 24 hours a day, 7 days a week. We understand this operation will be similar to the operation currently occurring at the Northcote St site, where an acoustic shed now stands. Even with the acoustic shed, noise from machinery and other operations at Northcote St travels well beyond the 200m distance that exists between the Parramatta Road West site and the school. We believe that similar noise as that generated by the tunnelling site at Northcote St will be heard from the school, with the potential to disrupt lessons and other classroom and schoolyard activities. This is an unacceptable situation for the students and staff, and will have a detrimental impact on student learning.

The EIS notes (Chapter 10, page 69) that the Yasmar Juvenile Justice facility next to Haberfield Public School will be one of the sensitive receivers predicted to exceed noise management levels at various times during the construction project. Given the M4 East experience – where noise has carried to homes and other buildings far more broadly than the EIS had forecast – it is difficult to imagine that the noise of rock breakers, spoil works or concrete saws would not carry to the school.

We also note that M4-M5 Link Project Director Peter Jones, in a WestConnex Community Reference Group meeting and in other conversations, has not ruled out flipping the works undertaken at the Muirs caryard sites. This would bring the tunnelling operation even closer to the school, and make it even more likely that noise would significantly disrupt student learning and other school activities.



If, despite community opposition, Option B does go ahead, we must have:

- Extensive noise mitigation undertaken at the school site before construction begins, in consultation with the school community and the Department of Education.
- Remedial work must be done on the school buildings to provide appropriate acoustic protection (for example additional insulation, double glazing and other noise cancelling building work, potential for additional equipment such as noise cancelling headphones or similar).
- Clear regulations declaring that work will be halted immediately if noise is causing disruptions to lessons and other school activities, and a process by which the school is able to report such disruptions quickly and effectively.
- Defined rules about the timing for noisy activity to minimise the disruptive effects on children.
- Once construction has started, direct and open lines of communication to ensure the school is able to notify the M4-M5 Link authorities/contractors of planned school activities that require noisy activity on the site to cease (ie NAPLAN or other testing).

2. Dust and air quality

Our community has noticed a significant increase in dust since M4 East construction began in 2016. In a meeting with M4-M5 Link Project Director Peter Jones on August 29, 2017, our Principal raised concerns that children's respiratory problems had increased as a result of the additional dust. This is already an unacceptable outcome of WestConnex construction, and will be compounded by continuing tunnelling, spoil management and other construction works even closer to the school under Option B.

We note that Table 9-16 in the EIS (Chapter 9) shows that Option B carries a much greater potential to release dust and other pollutants into the air than Option A, especially in relation to the demolition and earthworks stages. Under both options, the risk for the 'track-out' activity is high. Table 9-18 shows that the number of receptors affected by Option B is also considerably higher than Option A.

We urge SMC and the Planning Minister and Department to reject the option that will have the greatest adverse impact on air quality and is the closest to a school, where young children with still-maturing respiratory systems spend at least six hours of each day.

Bland St and Alt St are popular pedestrian routes for the many Ashfield families whose children are enrolled at this school, therefore hundreds of students and their families will be further exposed to the dust and other pollutants as they walk directly past the Option B sites.

The EIS says that the number of receptors (ie people) assumed to be affected at a school was 500. This is significantly below the number of students/staff/parents/outside-of-school hours care staff/other community members who spend their whole or part of their day at Haberfield Public School. The numbers would in fact be well over 800 on any given day, a 60% increase on the EIS estimate. With each year of construction, additional 'receptors' will be affected with subsequent intakes of kindergarten children.

We remain concerned about the ventilation stack located about 500m from Haberfield Public School. The school community remains of the strong belief that this stack must be filtered to limit



the level of toxic vehicle emissions released into the atmosphere. We cannot understand why, if the NSW government is spending billions of dollars on this project, it cannot afford to filter the stacks to ensure the least amount of harm is done to those who will breathe the air released.

If, despite community opposition, Option B does go ahead, we must have:

- As much surface-level demolition as possible completed outside term time.
- Real-time dust monitoring at or near the school and a condition of approval (and establishment of process) that in the event of excessive dust levels affecting students' learning, health or safety, the proponent be required to implement adaptive management measures including modifying activities or ceasing activities altogether (for example cessation of activities may be required in unusual weather events where there are extreme winds etc).
- Monitoring of air quality on an hourly basis so we can ensure that average air quality is not disguising high levels of pollutants at times when children are particularly exposed eg lunch and recess.
- Mitigation measures to ensure students and staff are not exposed to dust inside while at school, including mechanical ventilation and air conditioning in key rooms ie assembly hall and identified classrooms. This should also include a subsidy to offset the cost of electricity to operate these, and/or the installation of solar panels and battery storage.
- Retention of the air quality monitoring station or similar technology on the school property (installed this month under the M4 East project) at least until the M4-M5 Link project has been completed, and ideally for two years after the stage has opened.
- Formal monitoring of adverse health effects experienced by students, particularly respiratory issues but also mental health issues caused by stress.

3. Traffic and pedestrian safety and traffic congestion

The school community objects to Option B because the light vehicle and heavy vehicle traffic it will generate will create real and significant safety risks for school children and their parents in travelling to and from the school during school drop-off and pick-up times, and when students go on excursions that involve walking to the train station, local ovals or other sites. Many children who might otherwise walk to school alone are having opportunities for independence limited due to parental concern about traffic safety.

We believe it is unacceptable, unsafe and lacking in common sense to locate construction sites that produce 170 daily heavy vehicle movements (140 at Parramatta Road West/30 at Parramatta Road East) and 160 daily light vehicle movements (10/150) only 200m from a primary school, on one of the primary routes families use to get to school on foot or in cars.

Due to traffic changes around Haberfield as part of the M4 East work, we have already seen a significant increase in cars travelling along Bland St past the school. Option B will make this significantly worse.

In particular:

- The proposed heavy vehicle ingress point to the Parramatta Road West site is located approximately 10m from the intersection of Bland Street and Parramatta Road which is used by a large number of students and parents in their commute to and from the school.



- This intersection is already the scene of many near-misses as drivers frustrated by increased traffic make dangerous choices, especially when turning right from Bland St, Haberfield into Parramatta Road. We believe this intersection requires turn-right green arrows from Bland St into Parramatta Road in both directions, and that the green light for pedestrians should go on first before the green light for cars, to give pedestrians time to cross the road before the traffic begins moving.
- The EIS outlines plans for temporary closures of one lane of Alt Street and Bland Street to establish construction vehicle access. This is unacceptable from a traffic impact and safety perspective given these streets are the main southern access routes to and from the school. It must be a condition of any approval that this never occur during school zone hours (8-9.30 am and 2.30-4pm).
- The EIS outlines plans for heavy vehicles to cross over Alt St on the Parramatta Road West site, which again is unacceptable from a safety perspective given the large number of students/families that use this road as a pedestrian route.
- The proposal would allow vehicles to enter the carpark (Parramatta Road East site) from Bland St and Alt St, which will lead to long-term significant traffic impacts along those streets and others near the school as workers use those residential streets to drive to the carpark. While we welcome the inclusion of a carpark given our experience of significant loss of street parking during the M4 East construction phase, we believe any cars entering the Parramatta Road East site must only do so from Parramatta Road.

Furthermore, the EIS is so conceptual it does not include any traffic management plans, promising only to release a Construction Traffic and Access Management Plan (CTAMP) and carparking strategy at some later stage. Given our experience over the past year or so, this community has little confidence in SMC and its joint venture partners/contractors' ability to manage traffic and access at its construction sites. For example, we are aware of periods during the M4 East construction phase in which traffic spotters have not been on duty when heavy vehicles are moving in and out of the Brescia site around 3pm when high numbers of students are moving around, in breach of commitments. To produce a CTAMP after the project has been approved, and in a process that does not involve community consultation, is insulting and extremely poor procedure.

In addition to the safety concerns generated by the traffic changes roads around the school, Option B will significantly increase traffic congestion around the school. This will be particularly on Bland St but we would expect this to impact surrounding roads as well. This will significantly disrupt parents and teachers who need to drive to school.

If, despite community objections, Option B does go ahead, it must be on the following conditions:

- No road or lane closures during school zone hours (8-9.30am and 2.30-4pm).
- Limitations on where site-related traffic (both heavy and light vehicles) can travel so that it does not go past the school.
- No egress/exit to the Parramatta Road East site from Bland St or Alt St.
- Pedestrian safety marshals at the Parramatta Rd/Bland St junction, the Alt St crossover and at the egress/exit locations at the Parramatta Road West site during all school zone hours. These marshals should be dedicated to pedestrian safety, not temporarily diverted from construction duties.



- In consultation with the school community, reconsider the major drop off areas for the school, including putting in place the necessary infrastructure (zebra crossings, all weather access) to have access via Chandos St or the Yasmar site.
- Zebra crossings to be staffed by 'Lollypop' people paid by SMC or associated entities.

4. Toxic contaminants

The school community is concerned about the toxic 'contaminants of potential concern' that may be dug up from the Parramatta Road West and East sites only metres away from the school and on pedestrian routes used by many students. As listed in Appendix Q, a large number of potentially dangerous contaminants are likely to be found at these sites, including asbestos, lead, metals, benzene and pesticides. It is deplorable to establish a construction site on a former caryard that will contain decades of dangerous waste and contaminants, just metres from a primary school, when other less-contaminated and already-utilised sites exist.

Project Director Peter Jones acknowledged at the school information night on 11 October 2017 that it is highly likely that a car yard and car service yard would have dumped contaminating material on site in the past and that the construction crews are likely to find asbestos. The class action law suit in 20 years' time if our children are dying from cancer and respiratory disease will be no consolation if the decision makers recklessly disregard community safety now.

5. Spoil haulage

We note that in a document outlining 'M4-M5 design changes and commitments in response to community feedback', WestConnex has reduced the planned spoil haulage hours at Darley Road after residents expressed concern about heavy vehicles on a busy local road. The EIS proposes the spoil haulage hours under Option A and Option B in Haberfield/Ashfield to be 24/7. We request that similar notice be taken of our concerns about noise, dust and traffic congestion on local roads and that spoil haulage hours be reduced in Haberfield/Ashfield. In particular we seek restrictions during school zone hours.

6. The 'hybrid' option or additional options

Since the EIS was released, we have heard from numerous community members about other options being considered for the activities outlined for Option A and B. These additional options including a 'hybrid' model (where sites in both Option A and B are used simultaneously), flipping the Parramatta Road West and East sites so that the tunnelling occurs via a shaft on the Haberfield side, and building a conveyor belt over Parramatta Road to carry spoil across one of Sydney's busiest roads.

None of these options are canvassed in the EIS, but all seem to be on the table. This leaves the community in an invidious position – how are we supposed to object to or pass comment on proposals that are not outlined in any detail anywhere? When will we be consulted on these alternative options if one of them becomes the preferred option?

We demand that if an option not outlined in the EIS becomes the preferred option for construction, that it have traffic/noise/air quality etc modelling run and be released for community consultation in the same style as the EIS.



General objections

As well as the objections listed above to Option B, the school community would like to make several general objections in response to the M4-M5 Link EIS.

7. Misleading statements about future WestConnex construction work

Since the M4 East concept phase in 2013 until earlier this year, the proponent has been promising the Haberfield and Ashfield community that above-ground construction work would not be required following the opening of the M4 East stage. It was a condition of the M4 East approval that all Haberfield and Ashfield above-ground WestConnex construction sites were to be rehabilitated and returned to the community when the project finished. Now we find we are to be subject to a further four years of significant disruption caused by above-ground construction activities at many of the same sites, and the new ones outlined in Option B.

Our community has been grossly misled – it is galling to learn that we have been asked to tolerate 'temporary' impacts that we now know will stretch on for nearly a decade. We object to the EIS on the grounds that it is a breach of SMC and WestConnex's promises to our community.

8. Conceptual nature of EIS/Preferred Infrastructure Report

As mentioned in section 3, the EIS can be considered conceptual at best. We request the Planning Minister/Department reject the EIS on the grounds it does not provide any final details for significant elements of the project, including construction site layouts, access arrangements, traffic management plans and other elements of this significant infrastructure project.

The uncertainty around the final design and details generates considerable anxiety for our community as the precise impacts of the proposal are unclear and have not been properly assessed. Furthermore, the future process does not allow for sufficient community consultation on any future refined designs or tightening of the regulations in response to community concerns.

We understand the SMC is already preparing its Preferred Infrastructure Report, which will include its final choice of option. We request that this report be made public as soon as it is filed with the Department of Planning and that residents be given the right to meaningful consultation on the actual plan, before a determination on this EIS application is made.

9. Lack of consultation

We object to the EIS on the grounds that it fails the Secretary's requirement for "meaningful" consultation. To begin with, the EIS is such an unwieldy and complicated document that it is almost impossible for non-experts to understand, or to have the time to read thoroughly enough to make considered thoughts on all of the matters raised. This submission represents our community's best efforts to comment on the material in the EIS.

Furthermore, the EIS submission period included two weeks of school holidays, which severely constricted the time the school community could use to consult internally, liaise externally and prepare our response. We also know of complaints that hundreds of residents within the proposed project zone were not even notified of feedback sessions. And despite constant requests to provide material in languages other than English to ensure residents of all backgrounds are consulted properly, we did not see evidence of any significant effort made to address this concern.



10. Urban design and landscaping/community connectivity

We are greatly disappointed that the M4-M5 Link EIS does not include more proposals to improve the urban design and community connectivity in the Haberfield region, that has been so destroyed by the WestConnex development. The EIS, Community Guide and other material promote the urban design work proposed for the Rozelle and Iron Cove section of the project, including waterside walks, parklands, wetlands and improved cycling and pedestrian links such as new bridges over the City West Link. (Once again, we do note the EIS contains no detailed designs for these improved amenities – as per the previous comments about the conceptual nature of the EIS, these are still ‘thought bubbles’ and details will not be provided until the Urban Design and Landscape Plan is prepared.)

However, it appears that Haberfield/Ashfield has once again been overlooked. We are the community that had dozens of heritage properties demolished, has been asked to endure at least six years of highly-disruptive construction activity (M4 East/M4-M5 Link) and will live with two enormous tollway/portal roads dividing our communities at Parramatta Road and Wattle St. In Chapter 11, section 11.6.4 makes the point that community connection can be severed during and as a result of major transportation projects, and that children’s development can be affected by heavy traffic. Yet our requests for improved pedestrian and cycling amenities continue to go unheard.

We request that this project focuses again on the Haberfield/Ashfield/Five Dock regions and develops improved plans for pedestrian and cycling activity. In particular, we request that the project improves the links across Wattle St/City West Link between Haberfield and Five Dock (potentially including an overpass to ensure safety of students and families who cross here to get to/from school), and creates more pedestrian/cyclist crossings across Parramatta Road.

Conclusion

The Haberfield Public School P&C Association vigorously objects to the proposed M4-M5 Link, and in particular Option B.

If a decision is made to approve Option B, this will be a decision that puts money ahead of the health, safety and learning environment of more than 650 primary school children.

We urge the Secretary of NSW Planning to advise the Minister to reject this EIS and publish our organisation’s name and submission in accordance with the undertaking on your website. We also ask for the P&C’s submission to be responded to as a separate item in the response to submissions, given our position as a key stakeholder and the number of people on whose behalf the submission is made.

Yours sincerely

Sherrill Nixon

Haberfield Public School P&C member/representative on the WestConnex CRG

On behalf of the Haberfield Public School P&C Association