

**Director, Infrastructure Projects, Planning Services  
Department of Planning and Environment  
GPO Box 39 Sydney NSW 2001**

**Application Number: SSI7485**

**WestConnex M4-5 Link from Haberfield to St Peter's with additional connections to the Iron Cove Bridge & Rozelle Inter-change.**

**We object to this application SSI7485.**

**Specifically our objections relate to the segment Project Synthesis as detailed in Appendix A, Volume 2A**

The following objections and comments are mostly relevant to the M4-M5 EIS Project Synthesis, Volume 2A, Appendix A, although related objections relevant to other chapters, appendices and annexures are identified and included below. We object to the errors and problems identified below.

## **1 Introduction**

### **1.5 Assessment and approval process**

We object to the use of **Appendix A Figure 1-2** Assessment and approval process (page 4). It is not the same Figure used in other parts of the M4-M5 EIS. It does not accurately represent the current Assessment and approval process and therefore misinforms readers. It seems that this figure has been lifted from earlier EIS documents, possibly from the M4 widening, M4 East, or New M5 EIS's.

We recommend that the Planning team compare what is printed in **Figure 1-2, page 4 Appendix A, Volume 2A** and compare it to what is used elsewhere in the EIS, i.e. **Figure 2-1, page 8, Chapter 2, Volume 1A**.

### **1.6 Future Consultation**

We also object to Section on **Appendix A** Future Consultation (page 4), also seems be out dated and most likely another cut and paste insert, that does not reflect the current M4-5 EIS consultation process.

We object that there were so many things uncertain and unknown about project, the M4-M5 EIS information sessions were not able to provide sufficient technical information and detail to concerned residents. In addition the current EIS consultation process was not widely advertised in a timely manner or way, and was inadequate, in terms of accessibility for residents who are:

- Blind or with low vision,
- Deaf or hearing impaired,
- Unable to read and/or write English,
- Frail and aged are unable to get to evening information sessions & there were No accessible daytime community information session

## 2 The Project

### 2.1.1 Tunnel excavation

In **Appendix A, page 7** states that: *'Tunnel excavation methods would be confirmed by the contractors engaged to construct the project. It is anticipated that the tunnels would be excavated using a header and bench construction methodology as described in Chapter 6 (construction work) of the EIS.'*

Pages 21-22 of **Chapter 6** outline many options and uncertainties relating to tunnel excavation methods, and whilst there may be some anticipation that a header and bench method is used, the construction contractor may decide to excavate using blasting measures.

We object to the indicative nature of the EIS and that the construction methods are being left open for the construction contractor to decide, with no further public comment permitted.

### 2.1.2 Connectivity

We object that there is no map or detail on connectivity issues relevant to the Wattle St interchange with road surface connections around Haberfield, and Ashfield, or the St Peters interchange within **Appendix A**.

There seems to be an assumption by the authors of this chapter nothing is happening or impacting upon Haberfield, Ashfield or St Peters in regards to connectivity, - or maybe that everything that is relevant to this has already been covered in the M4 East EIS, or the New M5 EIS.

**Appendix A** details connectivity concerns and matters about Rozelle and Iron Cove Link surface works, but fails to provide information or consideration of Haberfield, Ashfield and St Peters.

We object to the omission of Haberfield, Ashfield and St Peters from EIS documentation and discussion about connectivity, whatever the reason. To not include or discuss our connectivity issues is to ignore and deny the full impact of the M4-M5 project upon the neighbourhoods of Haberfield, Ashfield and St Peters.

We also object that there is often other important detail, modeling or background information missing from other chapters, appendixes and annexures in EIS relevant to Haberfield, Ashfield and St Peter's because it is assumed to have been covered in the M4 East or M5 EIS.

We object to the assumption that what has been presented previously in the M4 East EIS and New M5 EIS is current and may be reliably used in the M4-5 EIS, as many local conditions changed once demolition and construction began in Haberfield, Ashfield and St Peters.

### 2.1.5 Motorway Operation complexes

We object that the Haberfield Parramatta Rd Ventilation Facility (PRVF) or exhaust stack, does not rate a mention on page 14 in **Table 2-1** Summary of motorway operation complexes and operational ancillary infrastructure.

The omission of the Haberfield PRVF does not allow local residents to comprehend the full extent of operations, which includes a double stack exhaust chimneys for both the M4-M5 and M4East as well a ventilation stack in one building.

We also object that the omission of the Haberfield PRVF facility from **Appendix A Table 2-1** keeps hidden, and seriously down plays, in the EIS and beyond, the full operational impact of M4-M5 project upon Haberfield and Ashfield, and overall, minimizes the scope and breadth of the project's impacts.

#### Utility services

We object that on **Appendix A** page 17, it is stated, *'The location of existing utility services and any changes required would be confirmed by the construction contractor during the detailed design of the project in consultation with the relevant utility providers.'*

We object that it is proposed that the construction contractor will confirm and take charge of the project associated utility works.

Our objection is based on our direct experience living on the border of Haberfield and Ashfield and of having experienced and observed how badly WestConnex utility work has been carried out during building of the M4 East project

Reference is also made on **Appendix A** on page 17, to a proposed Utilities Management Strategy (in **Appendix F** of the EIS).

We cannot find in the EIS, either in **Appendix A** or **Appendix F** sufficient detail about a Utilities Management Strategy that confirms or gives confidence that proposed utility works will be managed any differently with the M4-M5 project than the currently poorly managed work undertaken for the M4 East or New M5 projects.

We also object that not all utility work will be covered by the Utilities Management Strategy, as outlined in **Appendix F** page 98: *'The Utilities Management Strategy details the major (trunk) utility works proposed as part of the project based on the concept design which is being considered by the EIS. Other minor utility works which do not meet the definition of construction are not considered as part of this strategy.'*

Our objection is informed by living with constant, disruptive and poorly managed WestConnex utilities work associated with the M4East project. Utility work mostly occurs on public streets and footpaths, requiring detours, concrete saw cutting, drilling, use of noisy sucker machines, sub contracted traffic controllers and vehicles, as well often needing to use diesel generators. Utility works is often noisy, disruptive and polluting. To date, none of the impacts of utility works associated with WestConnex, could be deemed “minor”, in terms of its impact into the lives of local residents.

We object that ‘minor utility works not meeting the definition of construction’ has not been identified within the EIS and request that the Planning approvals team does not approve the EIS until what is ‘minor’ is clarified.

We recommend that all utility works, included those deemed to be “minor” be included in Utilities Management Strategy.

We object that what might be different in approach to utilities management, compared with earlier projects has not been clearly outlined in the EIS.

We note reference to and most likely will support a Utility Co-ordination Committee as referred to in **Appendix F** on page 97. This may be a positive step in the right direction. But we are concerned that such a committee would need to be truly independent of the project contractor.

We recommend that any committee that should be established and supported by an independent agency or organization (eg Inner West Council), and as a condition of approval require the active participation of senior technical employees of the contractor.

We also recommend Terms of Reference be developed pre and not post approval.

### **2.2.2 Construction ancillary facilities, Haberfield/Ashfield Options A & B**

We object that the construction options, identified on page 19 in **Table 2-3**, Possible construction ancillary facility combinations at Haberfield and Ashfield assessed in this EIS do not:

*‘...assist in informing the development of a construction methodology that would manage constructability constraints and the need for construction to occur in a safe and efficient manner, while minimizing impacts on local communities, the environment, and users of the surrounding road and other transport networks ...’*

Neither Option A nor Option B minimize impacts on Haberfield, but extend, by four or more years, the burden and adverse impacts of WestConnex construction upon residents, services and businesses.

The construction ancillary facilities required to support construction of the project shown in **Figure 2-7** include:

**Option A:** Wattle Street civil and tunnel site at Haberfield (C1a)

- Haberfield civil and tunnel site at Haberfield (C2a)
- Northcote Street civil site at Haberfield (C3a)

**Option B:** Parramatta Road West civil and tunnel site at Ashfield (C1b)

- Haberfield civil site at Haberfield (C2b)
- Parramatta Road East civil site at Haberfield (C3b)

The fact is that the project engineers have made it very clear that their preferred option is to have a hybrid of both Options A & B. Numerous other additions have been mooted, including a possible conveyor over Parramatta Road to move spoil plus an additional pedestrian footbridge for workers to cross Parramatta Road. If these additional proposals are to be considered they need to be included within an EIS for public consultation. A proper EIS will need to revise and provide new data analysis of the projected impacts of construction noise & vibration modeling, dust impacts & air quality. The current vague concepts, that the project engineers are already significantly proposing be revised, should not be approved in their current form.

We object to the lack of EIS inclusion and analysis of the promised and feasible option made, during the M4East consultations, that there would be NO additional above ground sites required for the M4-5 link. It remains feasible to use the new portals built for the M4-5 link in Wattle Street in conjunction with spoil removal via the M4-5 tunnel stubs below ground into the M4 East tunnels. The M4-5 link project team have confirmed that this method is entirely feasible and reasonable, although would take a little more time to execute.

We recommend that the originally proposed option (of no additional surface ground sites in Haberfield/Ashfield for the M4-5 link, given by the SMC at M4E consultation) to minimize surface impacts of construction on residents, be incorporated into the revised EIS and be the required option for any approval.

#### **2.2.4 Construction work hours**

We object to the proposed ongoing 24 hour industrial scale activity in the midst of residential areas. I note that **Table 2-1, footnote 2**, identifies that the Darley Road site would only be subjected to spoil removal during normal construction hours. This courtesy must be extended across the whole project, to enable residents of the inner west respite from the extended project. This is not a short term impact project. Residents are unreasonably subjugated to its impact 24 hours a day. This cannot be permitted to continue; it is not reasonable to subject residents to this degree of intrusion into their everyday lives.

We recommend that all project spoil haulage from all sites occur only during routine construction hours.

We recommend that there should be an absolute curfew on all project work after 11 pm.

We recommend that any urgent night-time road work or road utility access should be permitted by the RMS/TMC to commence from 7 pm and to cease by 11pm.

### **2.2.5 Spoil Haulage Routes**

We object to the vagueness of this section. Once again the public is being asked to consider and the Minister approve a process where all key proposals are yet to be determined. The proposals that are presented are unsatisfactory and not currently appropriate for any meaningful consideration.

### **2.4 Potential future uses of remaining project land**

We object that the proposed future land use for Parramatta Rd West & East civil and tunnel sites does not include an UDLP option. The destruction of the heritage of Australia's first garden suburb warrants consideration of return to the community of some amenity after the decade long disruption caused by Westconnex.

We recommend that if these Parramatta Road sites are utilized, then they should be considered as UDLP or Legacy Project Lands, to be returned to the community, for community use once the project is completed.

## **3 Design evolution and impact avoidance**

We object that this section has not considered any impact avoidance strategies for Haberfield/Ashfield. For example it could have proposed continuing with the promise made to Haberfield residents during the M4 East consultations, that the extensive work undertaken during the Wattle Street interchange re-design would obviate the need for any future above ground sites for the M4-5 project. In Table 3-1, the notion of either Option A or B is furphy. They both just extend construction fatigue on thousands of people for too many years. This omission is serious and requires redress. **(See request in 2.2.2)**

## **4 Project impacts and environmental management**

WE object to the weak analysis provided in this section. Table 4-1 identifies all residual impacts as medium. There is neither detail nor rationale on how this was determined. The lived experience of residents, from both the M4E and M5 projects, does not give cause that these assumptions are valid.

Also Westconnex is road traffic inducing project, designed to commercially maximize revenue by having people use its toll roads. Consequently, while Westconnex directly cannot control traffic growth, by its very existence, in the absence of other satisfactory alternatives; it is the cause of creating more emissions, especially around its exit and entry portals.

Table 4-1 also neglects to analyse impacts on Haberfield/Ashfield and St Peter's.

## **5 Project performance outcomes**

We object to the presentation of Table 5-1. It is clear that the EIS is deficient in its presentation of up to date and factual information.

- The consultation project outcome is false. It cannot conclude that there will be an engaged and informed community, based on the lack of detail in this EIS.
- The Transport & traffic outcomes appear optimistic.
- Air quality outcomes have not been achieved to date with Stages 1 & 2. Effective management of dust, odour & other emissions has not occurred to date during construction. How can there be any confidence that this will improve in Stage 3?
- Noise & Vibration – Amenity. The lived experience of residents has been that this issue has been very poorly managed to date in all the Westconnex stages. Effective management has been lacking and residents who complain about interrupted sleep and vibration have had unsatisfactory responses and mitigation to their concerns.
- Urban Design and Visual Amenity. There is a complete lack of proposals for Haberfield/Ashfield. The lack of integration of this EIS with other EIS proposals demonstrates the lack of synthesis across project elements.

## **6 Project Uncertainties**

Table 6-1 highlights many of the multiple uncertainties involved. Again this confirms the view that this EIS proposal is still the indicative design stage. There are too many uncertainties for the public to make informed comment on many aspects.

## **7 Project justification and conclusion**

### **7.1 Strategic context**

We object that the current strategic focus of the Westconnex project ignores the initial proposal was to link the airport and ports to the West and Southwest. After nearly \$20 Billion of expense, this will still not be achieved.

### **7.2 Need and justification**

Once again the EIS fails on this issue. We object because it fails to demonstrate how the project represents part of an integrated transport solution. All the proponents do is suggest that the solution to the problems that Westconnex will cause by its construction is to build yet more tollways. The opportunity cost of investment in Westconnex is that public funds have been diverted into an expensive project, for which the public will continue to pay for many years to come, including annual toll charges that will increase in excess of inflation.

### **7.3 Biophysical, economic and social considerations**

We object to the set of conclusions in this segment. Little evidence has been shown to back up these assertions. There is no evidence to support the outcome from Westconnex that there will be reduced traffic on major inner west carriageways.

### **7.5 Cumulative impacts**

We object to the evidence is accurately presented to demonstrate the benefits of the project.

There are multiple cumulative impacts of this decade plus long project which are noted. However the mitigation strategies are generic and weak. This requires significant further development, before any approvals should be given.

### **7.6 Conclusion**

This section is mercifully short. We object that it concludes with little of substance and is more or less a statement of wishful aspiration. It does not demonstrate a sound conclusion of project synthesis, that is based on analysis and consideration of scientific evidence.

### **SUMMARY**

This “synthesis” demonstrates that the current document that purports to be an EIS, is really just a concept design. If the public cannot respond, because of the lack of definitive information within the EIS, then the Minister cannot give informed and prudent approval.

We recommend that the Minister defer any approval of the project until after the Preferred Infrastructure Report is completed and released for public consultation, in conjunction with a revised EIS.

Yours sincerely

Victor Storm, E  
Sharon Laura, E



List of recommendations in this submission:



**We recommend that the Planning team compare** what is printed in **Figure 1-2, page 4 Appendix A, Volume 2A** and compare it to what is used elsewhere in the EIS, i.e. **Figure 2-1, page 8, Chapter 2, Volume 1A.**

**We recommend that all utility works, included those deemed to be “minor” be included in Utilities Management Strategy**

**We recommend that any committee that should be established and supported by an independent agency or organization (eg Inner West Council), and as a condition of approval require the active participation of senior technical employees of the contractor.**

**We also recommend Terms of Reference be developed pre and not post approval**

**We recommend that all project spoil haulage from all sites occur only during routine construction hours.**

**We recommend that there should be an absolute curfew on all project work after 11 pm.**

**We recommend that any urgent night-time road work or road utility access should be permitted by the RMS/TMC to commence from 7 pm and to cease by 11pm.**

**We recommend that if these Parramatta Road sites are utilized, then they should be considered as UDLP or Legacy Project Lands, to be returned to the community, for community use once the project is completed.**

**We recommend that the Minister defer any approval of the project until after the Preferred Infrastructure Report is completed and released for public consultation, in conjunction with a revised EIS.**

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**I object to this application SSI7485.**

I am happy to clarify or discuss any of the issues that I have raised in this submission. I look forward to your considered response. I request that our names and objection be noted and recorded and that my submission is made publicly available.

Specifically, I write to object to what the EIS presents in Volume 1A Chapter 4, Project development and alternatives, as an accurate representation of the development of the M4-M5 project including options considered. Specifically my concern is in relation to proposed construction sites in Haberfield/Ashfield presented as Option A and Option B.

I request the Department of Planning not approve the application because significant and relevant information has been omitted from Chapter 4 of the M4-M5 EIS, particularly in relation to Haberfield Option A and B. These omissions make Chapter 4 and the entire EIS incomplete and not ready for exhibition, assessment, or approval.

- False and misleading or omitted information brings into question the validity of the entire M4-M5 EIS. All chapters, appendices and annexures of EIS rely upon the accuracy of project development background information as presented in Chapter 4. If Chapter 4 is inaccurate and inadequate, then so is the rest of the EIS.
- Specifically, what is presented in the M4-M5 EIS is false and misleading due to no mention or consideration of what occurred during the M4 East exhibition, assessment and approval process, - and how this background information and WestConnex project knowledge relates to the current M4-M5 application.
- What was promised to the community during the M4 East Concept phase (2013-14) and M4 East EIS exhibition phase in (2015-16), was that there would be **no** additional above ground construction sites in Haberfield and Ashfield after 2019. If the M4-5 were approved, then only limited construction work would be required to fit out of the M4-M5 ventilation stack, as well as use of the M4-M5 entry and entry ramps along Wattle St, between Parramatta Rd and Ramsay St, Haberfield.
- When the WestConnex M4 East project was approved in February 2016, the M4-M5 (Stage 3) ventilation facility and exhaust chimney, the

M4-M5 'blind portal' entry and entry surface ramps, and the M4-M5 mainline tunnel stubs were also designed and included to be constructed as part of the M4 East project to obviate any further need for additional surface work with the M4-5 project.

- The M4-M5 exhaust stack is currently being built onsite as part of the M4 East Parramatta Rd Ventilation Facility (PRVF) opposite Bunnings, the M4-M5 entry and exit surface ramps are currently being built along Wattle St, Haberfield between Parramatta Rd and Ramsay St, Haberfield, and the M4-M5 mainline tunnel stubs are being tunnelled and will end deep underground around 142-144 Alt St, Haberfield.
- What was promised at the time of M4 East EIS exhibition and approval was that if the M4-M5 were to be approved (as predicted by SMC/WDA), there would be no need any above ground construction sites in Haberfield and Ashfield. This promise was repeated and reiterated from 2013 until recently, and was said to be being both reasonable and technically feasible.
- This promise was also actively used, in 2015/2016, to justify the significantly changed design and expansion of the Wattle St interchange in the M4East EIS, from what was presented to the community during the M4 East Concept Plan information sessions in 2013/2014.
- This promise of no M4-M5 above ground construction sites in Haberfield or Ashfield has subsequently been used as the basis for asking for community and resident 'patience' for the promised 'temporary' duration of WestConnex M4 East construction activity. This M4East construction is currently causing significant and adverse health, well-being, social and business impacts in Haberfield and Ashfield.
- It was promised, and was a condition of the M4 East approval that in 2019, all Haberfield and Ashfield above ground WestConnex construction sites were to have been dismantled, as well the Urban Design and Landscape Plan (UDLP) completed and Legacy Project 'surplus lands and property' delivered back to the community. These promises were still being reiterated in early 2017, when there was community consultation on how surplus land would be restored to the community in 2019.

I object that the M4-M5 project proposes to deny and renege on what was originally promised to the Haberfield and Ashfield community in 2019, and which will now result in a total of 8 years, or more, of construction being imposed upon the residents and businesses.

This is scarcely a temporary proposal that residents should be forced to endure! Whilst the proposals made in the current M4-5 EIS are feasible, they are unreasonable because of the sustained and unacceptable impact on the

lives of Haberfield/Ashfield residents. A decade long intrusion and disruption into the everyday life of people from 2013-2023 is unreasonable.

I specifically object that no feasible or reasonable alternative to 8 years of construction is being presented or considered in Chapter 4, or elsewhere in the M4-M5 EIS.

Even since the release of the M4-M5 EIS, project team members have conceded it is feasible to build the M4-M5, as promised, without additional above ground construction sites in Haberfield and Ashfield.

I recommend that the Department of Planning and the Minister of Planning determine that it is both feasible and reasonable for the proposal to remain true to promises already made to local residents.

I recommend that the Department of Planning and the Minister of Planning should also determine that it is unreasonable to expect the Haberfield and Ashfield community to live with and try to survive a further 6 years or more (totalling a decade or more) of new and continuing WestConnex above ground construction sites and activity.

- The promised option is an alternative that has not been documented, or considered as a viable alternative or option within Chapter 4. This is a significant failing within the EIS.
- Chapter 4 makes no mention of this important background information and promise, and does not consider the reasonableness and feasibility of this construction option. This is a major omission and failing with the M4-M5 EIS.
- The applicant has also not understood or fully revealed the evolution of the M4-5 project and has not adequately considered the integration of the proposed M4-5 Link with both the M4 East, and New M5 projects.
- Chapter 4 does not fully and truthfully summarize the project evolution and design refinements for the key components of the project. The proponents of the M4-M5 project and the authors of the EIS are either completely unaware of the projects full and true development history in relation to the Haberfield and Ashfield promise, or are prepared to ignore it as a matter of expediency. As they describe in the EIS the options development process for permanent and temporary infrastructure, facilities and construction staging, they ignore the promise made to Haberfield and Ashfield residents, present an Option A and B regards construction sites and staging, but effectively fail to present all options that are technically feasible and reasonable.
- Moreover, at public consultations, the project team have outlined a number of design initiatives which are not mentioned at all in the EIS. These include use of a conveyor belt across Parramatta Rd to move spoil from one side to another, use of rock crusher mill & and

construction of an additional foot bridge to permit workers access from one side to the other.

- This is also a major EIS failure with significant impacts for residents living around where the M4-M5 will connect with the M4 East Wattle St, Haberfield interchange, - as well for residents living around where the M4-M5 will connect with the New M5 St Peters interchange.

I also specifically object that on page 4-1 it is stated that:

*the project described and assessed in this EIS is based on a concept design that is subject to further refinement during detailed detail and construction planning, as described in Chapter 1 (introduction).*

- It is wrong, and I object that such an important infrastructure project is being assessed on what is acknowledged as only being a concept, with much important detail to be refined and made public only after approval.
- I request that the Department of Planning and the Minister not approve the application until more than a concept design requiring refinement is provided.

Chapter 4, by omission or provision of misleading or false information, has not given a true account, and considered the full range of construction options in Haberfield.

- I specifically object that Haberfield Option A and Option B are being presented with no background reference to promises made to the community during the M4 East EIS exhibition and assessment process.
- I also object about the way Chapter 4 and EIS summarises the Haberfield and Ashfield Option A and B. The 2 options are summarised in such a manner, that upon an initial reading of the EIS, it seems that there is a simple choice between 2 Construction Options, each proposing to use 3 sites different location.
- However on closer reading of the words, combined with an examination of tables and figures, it becomes apparent that the M4-M5 East EIS is seeking approval of all 6 construction sites, and that the final decision as to exactly which and how many sites will be required - and the staged timing and duration of their combined usage - will be determined by the project builder, during detailed design and construction planning after approval has been granted.
- I object that the way Option A and B is summarised within the EIS does not clearly show the overlapping of construction activity and extended duration of proposed construction time across at least 4, if not five of the sites in Haberfield and Ashfield. This is also a serious omission of detail of what is actually proposed in the EIS

- I object to the indicative nature of the EIS specifically in relation to the Option A and Option B Haberfield and Ashfield construction sites and staging.
- It is unreasonable to proceed with the assessment and approval process without requiring more detailed information and putting it out for exhibition regards Option A and B.

The SEARs Page 4-2 says that:

*“a demonstration of how the project design has been developed to avoid or minimise likely adverse impacts; (and that details about the project evolution and design refinement process that has been used to avoid or minimise likely adverse impacts are included in section [4.5](#) and section [4.6.](#))”*

**4.6.2 lists the following criteria for review of for project options”**

- ***The locations of key project infrastructure – where feasible, the construction ancillary facilities would be located within or adjacent to land which would be used for permanent operational infrastructure.***  
**Response:** HABERFIELD/ASHFIELD OPTION B acquires and alienates increased amounts of private land
- ***Co-locating sites with other WestConnex projects where possible – the project would use construction ancillary facilities approved for use by the M4 East and New M5 projects at Haberfield and St Peters respectively.***  
**Response:** OPTION B adds new land to the project footprint and also both OPTION A & B renege on previous promises and assurances given by SMC to minimise above ground impacts on local residents with the M4-5 project.
- ***Land is suitable for use – this included consideration of surrounding land uses, biodiversity and heritage values and minimising disruption to communities.***  
**Response:** Both Options A&B will significantly disrupt local communities
- ***Accessibility – sites would be located close to arterial routes for spoil haulage and would minimise use of local roads through residential areas.***  
**Response:** The promised option of no above ground construction sites in Haberfield/Ashfield permits use of tunnel exit portals and then underground tunnel movements for spoil haulage. So this option would impact significantly less on all residential areas in Haberfield/Ashfield.
- ***Minimising private property acquisition – the aim is to utilise government owned properties where possible.***  
**Response:** Option B involves more private land acquisition

- **Construction program implications** – *site selection that would enable construction works to be completed as efficiently as possible.*

**Response** Whilst there may be efficiencies for engineers with Options A & B or their more extensive preferred hybrid options, these efficiencies do not properly consider the impact of a decade long industrial project in the midst of a densely populated residential setting. The loss of productive efficiency of thousands of employees, businesses and school children impacted by these proposals is not adequately assessed nor quantified.

- It is noted that the EIS proposes to minimise the impact of the project around the Darley St site, by limiting work to business hours. This is supported and should be extended to all project sites. There should be no project work, nor spoil haulage outside routine construction hours, due to the extended time frame of the project. There should be an absolute night-time curfew, on all work from 11 pm.

**Recommendation:**

Any conditions of approval must include a requirement For no construction work (including Spoil removal) to be permitted out-of-hours, with a night-time curfew imposed on all work from 11pm until 6am.

Further, that the more up-to-date conditions and licensing terms applied to the Sydney Metro (rail) Project should be applied to Stage 3, should it proceed, and retrospectively applied to Stages 1 And 2.

Additionally, any conditions of approval must include a requirement that RMS Road occupations be allowed from 7pm onward to assist with implementation of the 11 pm night-work curfew.

To sum up:

- The EIS has gross deficiencies, as outlined above, which makes it impossible for the public to make an informed response.
- The Secretary should not recommend, nor the Minister approve this EIS.
- The Secretary should instruct the proponents to accurately reflect the historic developments and revise the SEARS to ensure any proposal honors prior commitments to local residents on how project impact would be avoided, minimized and mitigated.
- The Minister should release the Preferred Infrastructure Report on the M4-5 for public consultation, in order that informed public response and critique can be offered. The Preferred Infra-structure report should be released with a revised EIS for public consultation.

Yours sincerely

Victor Storm E:   
16 October 2017





## Appendix F Utilities Management Strategy

**These comments refer to this section, with comments, questions and some recommendations.**

**Refer to:** Section 1.4 and 1.5 (pages 7-8) Purpose and scope of Utilities Management Strategy

The Utilities Management Strategy provides information in relation to: Utility works **WITHIN** the project footprint. This utility work will be subject to a Utilities Relocation Management Plan, if the works are to be carried out prior to approval of a Construction Environmental Management Plan (CEMP), or otherwise subject to the CEMP.

Utility works **OUTSIDE** of the project footprint. ‘This Utilities Management Strategy provides information on the type of utility works likely to occur outside of the project footprint, the areas where this work is likely to occur and the framework of how these utility works would be managed. This includes requirements for stakeholder and community consultation, environmental constraints analysis and environmental risk assessment’ (page 8).

We object that any utility work **within** the project footprint will occur prior to the proper development and approval of the M4-M5 Utilities Relocation Plan (sub management plan) and Construction Environmental Management Plan (CEMP).

We object that any utility works **outside** of the project footprint will occur prior to more detail provided about the Utilities Management Strategy to be developed.

These objections are based on our experience of current M4East project utility work (inside and outside of the M4East project), that has all too often been badly coordinated causing serious adverse impacts upon us and other residents. Particularly given that utility works are often done at night and outside of standard construction hours, - involving high impact equipment, - along roads and pedestrian paths. See section 2.1 (page 12) below.

Residents living alongside the New M5 project have experience similar adverse impacts from utility works.

We support the development of a robust and independent Utilities Management Strategy, and a more robust and better Utilities Relocation Management Plan and Construction Environmental Management Plan (CEMP) than in use for the M4 East and New M5 projects.

Refer to (page 12)

Section 2 Approach to proposed utility works

Section 2. Areas of interest

‘ The areas of interest for the proposed utility works within and outside of the project footprint where services are likely to be directly impacts would be required. The

majority of the areas of interest are located in the vicinity of the surface works required as part of the project'

We object that the EIS does not provide sufficient detail about utility work and specific areas of interests. It is a bold statement that the majority of surface works required is within the project area, with no evidence within the EIS to back up this statement.

Refer page 15

Section 3 Proposed Utility works

Section 3.2 Wattle St interchange at Haberfield/Ashfield

We object that there it is only during detailed, that an assessment will be carried out to demonstrate that the construction of the M4-M5 Link tunnels would have no adverse settlement or vibration impacts on services (existing utility services in the area, including Sydney Water sewer and watermain, council stormwater pipes and Ausgrid transmission cables)

We base this objection of our M4 East observation and experience of roads and footpaths in Alt St, Martin St and Waratah St, plus Reg Coady Reserve in Haberfield being constantly dug up, and works being constantly mismanaged, since 2016, causing serious adverse health, social and economic impacts upon residents. This poor co-ordination and repeated works have a financial cost, and it is unclear who is carrying the financial burden of the mistakes made in these M4East utility works.

We recommend that prior to approval that it is clarified and presented to the community and stakeholders, how conditions of approval related to utility works, inside or outside of project boundary, are better and more robust than M4 East and New M5 conditions of approval.

Refer to page 16 text, and

Table 3-1 Wattle St interchange – Haberfield

Table 3-2 Utilities at Parramatta Rd – Haberfield

'For the two Option B construction sites located on Parramatta Rd (C1b and C3b) the existing services in this area include Sydney Water sewer and mains, Telstra communications cables and Ausgrid transmission cables in Parramatta Road, Bland St and Alt St. None of these would be impacted by the project.'

We recommend that this bold assertion in the EIS is backed up by more detail and evidence prior to approval.

Refer to

Pages 30-42

Section Proposed power supply

Note: that major construction power will be required at sites where tunnelling is to be undertaken by roadheaders and that the construction to supply power other sites will be arranged by the contractors and provided by local supplies or by **generators**.

We object to the use of off road generators on any construction site located within a residential area. These generators are polluting, are dangerous to the health of people living near by, or passing by, particularly children, the aged or those with respiratory conditions.

We strongly object to the use of any off road generators being used on the Parramatta Rd East and West construction sites (C1b and C3b) because of their proximity to homes, schools, bus stop, and pedestrian paths at the intersection of Parramatta Rd, Bland St, and Alt St, Haberfield.

We recommend that if the Parramatta Rd Option B sites are to be used, they have installed and only use mains powered electricity. If generators are to be used for temporary purposes, exhaust emissions must be filtered, and have better acoustic treatment than the M4 East generators used on sites along Wattle St, Martin St, Dobroyd Parade and Waratah St, Haberfield.

We object that for Haberfield Option A and Option B, that only an indicative alignment for power connection from the Croydon Rd substation to construction sites is included in the EIS.

We recommend that no approval is granted until after more detail about the alignment is provided, so as to ensure that proper mitigation measures are put in place, prior to commencement of this utility work, in order to better protect the health, social and economic of the community, than occurred during similar works associated with the M4 East project.

We object that a final decision on power supply option, and feeder route options is to be made by the contractor, all along the project route, AFTER approval and during the detailed design phase.

WE recommend that give the adverse impacts suffered by residents caused by utility works from the M4 East and the New M5 projects, and lessons be learnt and the conditions of approval for the project are strengthened and more robust than current.

Refer page 97  
Section 8.14  
Cumulative impacts

There is indeed going to be cumulative and adverse impacts from utility works associated with the concurrent, consecutive and overlapping of the M4-M5 project with the M4 East and New M5 projects.

To date, there has been no proper record and documentation of adverse health, social and economic impacts caused by M4East and New M5 project.

We object that the EIS has made incomplete and inadequate predictions of likely health, social and economic impacts, as a result of the proposed project in the absence and integration of data related to the now known impacts of the M4 East and New M5 projects.

We recommend that approval not be granted until after data is collected and analysed on impacts caused by the M4 East and New M5 and that this data is used to revise what EIS predicts and attempts to minimize regarding the impacts of the M4-M5 project.

Page 97, 8.14, Cumulative Impacts

Page 99, 9.5, Coordination of utility works

Page 102, 10.1, Management measures

These sections highlight the significant impacts of the cumulative impacts, because of poorly coordinated work and the lack of appropriate management measures.

#### **Utility Co-ordination Committee.**

We support this proposal in principle. We recommend that the Terms of reference are supplied for public. We recommend that this committee is auspiced and managed by an independent body, such as the Inner West Council. Impacts should be reduced where possible and if not feasible minimised.

Sharon Laura  
Victor Storm

October 16 2017

**Director, Infrastructure Projects, Planning Services  
Department of Planning and Environment  
GPO Box 39 Sydney NSW 2001**

**Application Number: SSI7485**

**WestConnex M4-5 Link from Haberfield to St Peter's with additional connections to the Iron Cove Bridge & Rozelle Inter-change.**

We are happy to clarify or discuss any of the issues that we have raised in our submission. We look forward to your considered response. We request that our names and objection be noted and recorded and that our submission is made publicly available.

**We object to this application SSI7485.**

Specifically, we write to object to what the EIS presents in Volume 1A Chapter 10, Noise and Vibration, as an accurate synthesis of how Noise and Vibration issues can be best managed within the M4-M5 project proposal. Our remarks focus particularly on the Haberfield/Ashfield end of the project proposal. It is also informed by our experience as a resident of Haberfield, living with the ongoing impacts of the M4E project on our daily lives.

One major observation throughout volumes of the EIS is that there are major gaps in synthesis between the different Westconnex projects. The M4E EIS was written long before consideration of the M4-5 link. At times the M4-5 link EIS refers to material as sourced from the M4E EIS. However in many instances there is lack of detail and analysis of the impacts of the combined projects. So there is no wholistic overview, which makes understanding local impacts for both Haberfield/Ashfield and St Peter's difficult.

We request the Department of Planning not approve the current application because Chapter 10, in association with Appendix J, of the M4-M5 EIS identifies a number of deficiencies in the applicant's proposals in the EIS as incomplete and not ready for exhibition, assessment, or approval.

Both Chapter 10 and Appendix J are clearly written and laid out, which has made analysis more straightforward than in some other chapters. In particular, it presents sequencing of works in a more clear fashion than the same material in Chapter 5.

However, the EIS requires revision and also incorporation of an analysis of the option promised to the communities of Haberfield and Ashfield at the time of the M4E consultation, of no additional above ground construction sites. In essence this option would enable all tunnelling from the tunnel stubs, via M4-M5 entry and exit portals

(constructed as part of the M4E project) along Wattle Street in Haberfield. The M4-5 link Project Director has confirmed that this option is both feasible and reasonable.

We object to the proposed Noise and Vibration impacts for residents of Haberfield and Ashfield from both Options A and B.

We object that there is no analysis of the impacts of the project team's preferred Hybrid option, which has elements from both Options A and B.

We object that there has been no consideration or analysis of an alternative option promised to the community, even as late as in March 2017, to Option A and B in Haberfield and Ashfield.

We recommend that this community preferred and promised, limited surface option be utilized. It is a version of Option C1a, without use of the surface lands and use of Option C2b for the PRVF fitout.

This option would have much less impact on residents who have endured much already. It would also permit the M4East UDLP and Legacy Projects to be fully implemented, without a four to five year delay.

We object to project proponent's proposals of all options, A, B and Hybrid for Haberfield and Ashfield, because of lived experience to date.

We are unclear if the noise impact modelling for this analysis differs from what was provided for in the M4E EIS.

We note from Section 10.1.4, Background Noise Monitoring and Appendix J Table 3.2, Noise Monitoring Locations, relies on noise monitoring data from Haberfield in 2014, before any demolition. There is no mention of re-validation, spot checks or maximum noise assessment. We are sure that the day and night-time RBL from Appendix J Table 3-3 are exceeded now in most of sites H.01 to H.06.

The analysis for the M4E advised the project team that few residents would be impacted by noisy work. In our Bland Street location, we were told we would not have any disturbance. The experience was shock to all. Perhaps once the built environment had changed, following building demolition and vegetation removal the whole situation was altered. Where we live, sucker trucks working near Ashfield Park on the Parramatta Road Ashfield site are intrusively audible. Similarly work at the Northcote St site, including the tunnelling exhaust fans, and the Wattle St to Walker Avenue site, both surface and ventilation shaft is intrusively audible across 24 hours. This is not to mention the impact of work that is undertaken near the Bland Street and Parramatta Road intersection.

We recommend that there be re-measurement and re-analysis of potential construction noise impacts for Haberfield and Ashfield, based on these now known and documented impacts.

We object to the assumption, expressed in section 10.1.5 that construction noise emissions are temporary and therefore it is acceptable that these levels can be higher. This set of projects will extend out over a decade, so what may be deemed acceptable higher noise intrusion, for a period of days or weeks, differs when it is proposed to occur for years.

Table 10-13 summarises anticipated out of hours work, which includes 24 hour construction traffic for material supply and for spoil removal, from all sites, excluding Darley Road. Table 10-14 outlines proposed construction work hours at construction ancillary facilities.

We object to these proposals for 24 hour spoil handling as unreasonable.

The experience to date, since 24 hour spoil removal has operated from the Northcote Street site is that the heavy laden trucks travel up and down Wattle Street via the G-loop to Parramatta Road. They are intrusively audible with each and every gear change as they accelerate and break up down this route.

If spoil from Rozelle and Camperdown was also transported down Parramatta Road, on a 24 hour basis, the noise burden would be placed on many, many residents of the inner west.

We recommend that the same hours of operation for spoil removal and material supply apply across the whole project, which is during standard construction hours (Monday – Friday 7am-6pm, Saturday 8am-1pm; NO work on Sunday or Public Holidays). There should be no routine heavy truck movement after-hours.

This would give all residents rest and respite in the evenings and at night. It would allow school children to do their home-work un-interrupted and permit a sound night's sleep for all.

Further, for after-hours road works, we recommend that the RMS/TMC permit road occupancy from 7 pm, to allow any key evening work to take place only between 7-11pm. There should be no road or utility work after 11pm, except in emergency situations.

We also object to the proposed use of the Parramatta Road East & West sites for any purpose, including tunnelling, spoil storage, construction worker parking and as a bus shuttle depot.

We recommend that the available, former Motor Registry site at Five Dock be used for the purposes of worker parking, bus shuttle and site offices.

We object that impact duration contains no worst-case scenario assessment on the hybrid Haberfield site for Options of A & B.

Operational noise models are described in Table 10-16, with a Model validation in Table 10-18. There is **no** identification or referencing of a combined modelling for

Haberfield/Ashfield, with the M4-5 Link portals on Wattle Street, in combination with the M4 E portals on Wattle Street/Dobroyd Parade and Parramatta Road.

We object to the lack of this information of operational noise models for Haberfield/Ashfield.

Section 10.3 Assessment of potential construction impacts, documents very clearly the modelled impacts for residents. The section on Option A 10-47 to 60 and for Option B 10-60 to 73, identify significant resident and facility impacts from both options. These are detailed further in Appendix J, Section 5.1.1 to 5.1.10, pages 80-133. Whilst mitigation and minimisation measures are proposed, the lived cumulative experience to date suggests that the proponent's option proposals are unreasonable.

We object to both Option A and B, based on their resident impact and further that the project team is actually proposing a more extensive and expanded Option, which is hybrid of both Options, proposing use of using more sites, than 3.

We object that the feasible and reasonable promised option of no additional surface facility, with use of only part of C1a and C2b has not been discussed as a viable and less intrusive option for public consideration.

We support overall proposals (page 10-72) for both mitigation measures and minimising construction impacts, namely:

- Increased site hoarding around ancillary facilities to 4 or 5 metres
- Upgrade of acoustic shed performance to the maximum extent
- Limits to the internal sound power level to 110 dBA within acoustic sheds

We recommend that the Minister reject the current application seek a revision of this chapter, which includes detail of the community preferred and promised, limited surface Option for Haberfield/ Ashfield.

We recommend that the Minister:

- reject the current application
- request a revision of this chapter and the whole EIS, to include detail of the community preferred and promised, limited surface Option for Haberfield/ Ashfield.
- defer any approval to the project until after the Preferred Infrastructure Design is completed and released for public consultation in conjunction with a revised EIS.

The public will then be in a position to provide informed feedback based on a more considered design.

Yours sincerely



Sharon Laura, E slaurar@gmail.com

Victor Storm, E hvstorm@gmail.com

**List of recommendations in this submission.**

**We recommend that this community preferred and promised, limited surface option be utilized. It is a version of Option C1a, without use of the surface lands and Option C2b for the PRVF fitout.**

**We recommend that there be re-measurement and re-analysis of potential construction noise impacts for Haberfield and Ashfield, based on now known and documented impacts.**

**We recommend that the same hours of operation for spoil removal and material supply apply across the whole project, which is during standard construction hours (Monday – Friday 7am-6pm, Saturday 8am-1pm; NO work on Sunday or Public Holidays). There should be no routine heavy truck movement after-hours.**

**For after-hours road works, we recommend that the RMS/TMC permit road occupancy from 7 pm, to allow any key evening work to take place from 7-11pm. There should be no road or utility work after 11pm, except in emergency situations.**

**We recommend that the Minister:**

- **reject the current application**
- **request a revision of this chapter and the whole EIS, to include detail of the community preferred and promised, limited surface Option for Haberfield/ Ashfield.**
- **defer any approval to the project until after the Preferred Infrastructure Design is completed and released for public consultation in conjunction with a revised EIS.**

**Director, Infrastructure Projects, Planning Services  
Department of Planning and Environment  
GPO Box 39 Sydney NSW 2001**

**Application Number: SSI7485**

**WestConnex M4-5 Link from Haberfield to St Peter's with additional connections to the Iron Cove Bridge & Rozelle Inter-change.**

We are happy to clarify or discuss any of the issues that we have raised in our submission. We look forward to your considered response. We request that our names and objection be noted and recorded and that our submission is made publicly available.

We both write this submission as local residents. However one of us also holds specific expertise in health areas, both in psychiatry and public health, which inform the specific observations and comments.

**We object to this application SSI7485.**

Specifically, we write to object to what the EIS presents in Volume 1A Chapter 11, Human health risk, as an accurate synthesis of how health and human risk can be best managed within the M4-M5 project proposal. The remarks focus particularly on the Haberfield/Ashfield end of the project proposal. It is also informed by our lived experience as a resident of Haberfield, of the ongoing impact of the M4E project on daily life.

We request the Department of Planning not approve the current application because Chapter 11, in association with Appendix K, of the M4-M5 EIS identifies a number of deficiencies in the applicants proposal and as such makes EIS incomplete and not ready for exhibition, assessment, or approval.

We make specific suggestions on how Departmental officers could better inform the Minister review, by seeking further information sought from affected stake-holders. We also make a series of specific suggestions about specific conditions of approval that should be added so that the objectives of this chapter as defined in the SEARS would have greater chance of being met.

### **Chapter 11 Human Health Risk**

This chapter outlines the potential human health impacts and quantifies the risks to human health associated with the M4-M5 Link project (the project), including:

- An outline of the methodology used to undertake the human health risk assessment
- A summary of the existing environment relevant to human health

- A description of the potential impacts of the project on human health during construction and operation
- Environmental management measures to be implemented to minimise any potential impacts of the project on human health.

**The central question is what different measures will be taken by the M4-5 project team to deal with manifold failures of implementation on M4 E project to satisfactorily minimise human health risk and the project impacts on surrounding residents? Further if more robust conditions of approval are made, how will compliance be regulated & enforced?**

The methodology for the human risk assessment is based on defining, quantifying where feasible, and assessing the potential risks to human health from the construction and operation of the project. The assessment focused on the key impacts of local and regional air quality, in tunnel air quality for tunnel users, noise and vibration and social changes.

This response will raise comments and questions about aspects of the chapter, adding some suggestions & then conclude with a series of suggestions that, we believe enable a more robust analysis of the application to be considered.

### **Section 11.2 Project design to minimize health impacts:**

This section asserts that placing the project underground minimizes health impacts. Sadly this does not resolve the health impact problem when the project surfaces, as it does in multiple places in Haberfield/Ashfield. The M4-M5 project as currently proposed will not minimize but rather increases and expands adverse health impacts in Haberfield/Ashfield.

The proposed Options A and B in Haberfield will further lengthen the duration of construction work in Haberfield /Ashfield, because of overlaps with the M4 East project and Option proposals which renege on promises to the local community during the M4E consultations & variations, that there would be no need for additional or new above ground construction sites in Haberfield/Ashfield.

### **Section 11.3 Existing Environment**

#### **Section 11.3.1 Population profile**

**Is the population estimate up to date, in respect of expected population growth figures for the Inner West over the period 2011-36?**

**Section 11.3.2:** This chapter references information received from the Sydney Area Health Service (which has never been an entity). This indicates that the data relied upon in the EIS is not new, may be out of date and cannot to be relied upon in this EIS. The use of the term Sydney Area Health Service (or CSAHS, SSWAHS) indicates that reference material in the EIS has just been cut and paste from M4 East EIS (which also referred to Sydney Area Health Service rather than Sydney Local

Health District, which was established in 2011). This suggests that the RMS was also probably using out of date information in 2015.

This raises concern on how up to date is the scientific and other information, that is being used to inform this EIS. The lived experience of residents affected by the current projects is that current measures have been inadequate to eliminate or minimise human health impacts during construction.

**We recommend that DP&E confirm and ensure that EIS uses the most up to date information about the population and relevant health statistics. The EIS needs to ensure that it is considering the current health of the existing population living along the project route.**

**Section 11.3.4, Existing Noise and vibration:** It was unclear, when were the measured noise levels, generally referred to in the EIS done around Haberfield, Ashfield and St Peters? Where new measurements taken for this EIS? Or are the background measurements that are referred to measures taken for the M4-5 and M5, prior to demolition of the built environment and removal of vegetation?

**We recommend that it is confirmed when noise measurements were taken across the M4-5 link footprint. If the measures relied on for this EIS include those taken several years ago, then there needs to a review and re-assessment of the baseline measures obtained, so that modelling can be based on the current environment of sound dispersal.**

#### **Section 11.4: Assessment of potential construction impacts**

Section 11.4.1: Potential Air Quality Impacts: “Significant mitigation of air quality impact” will be “managed” to minimise impacts. Dust mitigation failures will be “short-lived”. How will this occur? It has not been the experience of residents to date, whose homes and cars are constantly covered in fine irritant dust.

One issue of concern is the large number onsite diesel generators proposed for use across the project. While there is no Australian standard for the safe running of these machines in residential settings, the Woolcock Institute identified that there can be significant fine particulate pollution problems from the operation of these generators. Experience from the M4E project has been that these cause both noise and air pollution to nearby homes. It is unacceptable that residents should be subjected to a diesel motor running day and night close by and polluting their homes.

Indoor air quality monitoring was not undertaken as part of the initial assessment. This again was noted as a deficiency and should be addressed prior to any work commencing.

**We recommend that, as part of the conditions of approval, there be no use of off road diesel equipment**

**We recommend that, as part of the conditions of approval, there be Indoor air quality monitoring inside nearby schools and homes, prior to, and during the project life.**

Section 11.4.2: Potential noise impacts from movement of construction vehicles “In all areas evaluated, there are no noticeable increases in noise from construction traffic on the proposed routes during the daytime or night-time.”

This appears nonsensical. If you have large truck & dogs hauling 25 tonnes of material day & night, you do experience construction noise increase. You can hear every gear change as these trucks go up and down Parramatta Road and Wattle Street at all hours.

Section 11.4.2 discusses ground-borne construction noise and says “The modelling addressed the worst-case situation when the tunnelling is occurring immediately beneath a sensitive receiver”

Was any worst case scenario modelling done for the Wattle St interchange/portals, which will also be constructed?

**Section 11.4.3, Table 11-5, p13:** Contamination risks from asbestos are cited to be low; how can we be assured that public safety risk is low, given the multiple recent breaches in management of asbestos contaminated soil in the M4 widening and M4E projects?

p14 Traffic management risks are also cited to be low: but again there are multiple examples of failure by trucking contractors to observe safety requirements

Pedestrian Safety has also been problematic, particularly for the children with carers – especially with children in prams, frail, aged, those with mobility issues, blind and vision impaired residents during road and path detours required for M4E construction.

### **Section 11.5 Assessment of potential operational impacts**

This is an area where the science has expanded knowledge at a rapid rate in the past 5 years. Public policy in most European countries is taking this on board, with proposals to limit motor vehicles in inner urban locales and ban petrol & diesel vehicles altogether.

Impaired air quality impacts on cardio vascular and respiratory health. It also impacts on children’s cognitive capacity. What is apparent from Tables 11-18,11-19 & 11-20 is that:

Sydney exceeds air quality standards for Particulate Matter (PM) now and that with the introduction of this traffic inducing project we will increase Maximum 24 hour averages of PM10 with the project, compared to not having the project and we will also increase the annual average of PM2.5 by over 7% and PM10 by 5.5%with the project, compared with not having the project. This is a serious problem, given that we already exceed health targets in these measures, which has long term health implications that are not quantified in the tables. Work done by the Woolcock Institute in their 2015 report and by Adrian Barnett in Queensland, highlight the problem that we face, and if this project is implemented as planned, would exacerbate. (Refer to Woolcock Institute report on Air Quality 2015)

Also Table 11-24 highlights increases in ill-health effects from PM2.5 for residents of Canada Bay, Sydney, Botany & Burwood. These effects require further analysis and explanation before any approval should be granted.

Table 11-25 notes the unacceptable increase in mortality risk from PM2.5 for elevated receptors. This brings into question impacts on residents around Homebush & North Strathfield from already established Westconnex infrastructure, into which the M4-5 link will drive more traffic.

**We recommend clarification of the PM burden from the project and reasons for locality based PM burden as identified in Table 11-24**

### **Section 11.5.2 Noise and Vibration**

Noise and vibration is correctly identified as having a number of adverse impacts. More recent evidence published this year implicates noise related sleep disruption as playing a contributory role in the development of Alzheimer's Disease.

It is also of note that children's cognitive development has been identified as being impaired by both poor air quality (even on exposure during a walk to school) and excessive noise exposure. (Refer Sunyer et al 2015, Sunyer et al 2017, Alvarez et al 2017)

The lived experience of residents from the M4E project has been that the predicted modelling of impacts was flawed. Many residents were told that a variety of projects undertaken would have no impact on them. Engineers continually expressed surprise that residents could hear work and would be awoken at night by work 400-500 metres away. The reasons for this problem are unclear. Perhaps sound modelling was undertaken prior to the demolition of many buildings and removal of large trees. Or the calculations were just incorrect. On the basis of this, there must now be accurate modelling and pre-emptive mitigation, not the practice of retrospective denial of impact.

**We recommend that, as part of the conditions of approval, there be no commencement of works unless mitigation measures are available and ready to be installed i.e mobile sound walls closer to source of sound (sound blankets on mobile cages able to be moved and positioned closer to the source of sound, better baffling than we have experienced with the M4 East), acoustic covering of jet fans and ventilation equipment. Also note the use of the containers as sound wall on New M5 site near airport.**

### **11.6 Assessment of potential social impacts on health**

**11.6.1: Changes to traffic and transport:** The M4E legacy is one of profound disruption to the Haberfield community, which the M4-5 link project will only prolong. A further 4-5 years of construction will take its toll. Public transport, pedestrian and cyclist access will remain interrupted. Commuting by car will continue to be disrupted for several more years.

**11.6.2: Property acquisition,** resulting in the loss of friends and neighbour continues to impact on many families.

**11.6.3: Green space** has been alienated both public and private. The ongoing construction noise & dust intrusion significantly diminishes the enjoyment of both parks and also private gardens. The reduced vegetation cover and the broad heat sink created by the project have increased the heat load and burden on the suburbs of Haberfield/Ashfield.

Any delays in restoring UDLP lands, with consequent delays in restoring aspects of the street tree canopy will exacerbate this problem.

**11.6.4: Changes in community:** Community links within Haberfield, between Haberfield & Ashfield and Haberfield & Five Dock will be impaired by increased vehicle traffic flows from Westconnex. This occurs both during construction and following completion.

**11.6.5: Visual changes:** The visual impacts are sustained and in the case of the prolonged nature of this project, not short-lived. Loss of aspect and longer site lines are irreplaceable.

**11.6.6: Equity:** The impact on Haberfield has meant that over 50% of its apartment base was demolished for the project. Also Housing Department tenants have been badly affected by noise intrusion around Dobroyd Parade, and their problems have not been adequately addressed for many months.

## **11.7 Economic Aspects**

Local businesses have suffered and continue to suffer in Haberfield. This is set to be extended by ongoing work for another 4-5 years. Many local businesses and jobs have been lost on the Parramatta corridor, which also reduces benefits to local businesses.

**11.7.1 Road tolling:** Tolling impacts on those with lowest incomes. The proposal to permit tolls to increase at 4% per annum, even when inflation is far below that, is a licence to print money for toll operators. It defers the cost of the project onto future generations at a compounded price level, which raises questions of inter-generational equity.

**We recommend that tolls only be increased in line with the CPI.**

## **11.8 Construction fatigue**

Construction fatigue is well and truly with us. The prospect of a further 6 years of work, some in combination with the M4E project over the next 2 years moves this decade long impact into the realm of unacceptable and unreasonable oppression of a local community. The lived experience has demonstrated that the current approval processes, based around impacts of short term projects should not apply. If a government has “state significant infra-structure” that it wishes to construct, it should not throw out the rule book and allow normal regulations that control such industrial work in the every-day world to be ignored. In fact the rules for a decade long intrusion into people’s lives need to be more thorough, better regulated and more closely monitored and enforces.

In addition to construction fatigue, there is also complaint fatigue. The experience residents have, when they have legitimate complaints about dust, noise or other

pollution, is one of slow response and often no response. If the communication team is pushed, the team member is often irritated by the complaint (as they cannot do anything about it). The most common response is a cut and paste email that states that the EPL licence allows such unreasonable noise or other intrusion.

**We recommend that as part of the conditions of approval, improved communications and complaints mechanisms are developed and implemented as part of any approval process.**

**We recommend that, as part of the conditions of approval, there is local project public liaison officer in at every construction site or area. Residents need to be able to make direct contact, in person, and not just through a service centre.**

**We recommend that as part of the conditions of approval, an independent and co-ordinated complaints system be established, possibly under the jurisdiction of relevant local Councils. This would serve as a one stop system that can accommodate phone, letter, email, or in person complaints, with support and follow capacity provided.**

**We recommend that as part of the conditions of approval the Department of Planning to establish and auspice neighbourhood group meetings and liaison, between local residents with relevant construction and project employees.**

**We recommend that as part of the conditions of approval there are regular, advertised weekly/monthly resident drop in sessions held either on site, or in the local area with: DPE compliance team and post approval teams, EPA reps, IWC Westconnex Unit, (and on a quarterly or six monthly basis inviting reps from Safe Work NSW, RMS, TfNSW, Transport Management Centre, SLHD, Primary Health Network, and technical and senior people from the contracted Project builder (and not the community engagement team). The project builder should finance, but not control the administration of these sessions.**

**We recommend that as part of the conditions of approval that there up to date project community notice boards at each construction site, and also at central project notice boards in other suitable locations, i.e. shopping centre, library, civic centre.**

### **11.9 Stress and anxiety issues**

The main factor contributing to stress and anxiety for local residents is the sense of loss of control of your own environment. The Westconnex project has been imposed on our community and consistently intrudes into everyday (& night) life, by disrupting sleep, leisure and recreation. It can have many physiological and psychological impacts. The decade long intrusion into the lives of ordinary people, without remit or mitigation is oppressive and discriminatory.

The M4E project team have handled stress and anxiety issues poorly.

**We recommend that better management of impacts and proper mitigation are required before any approvals are given.**



The Westconnex series of projects present challenges and difficulties that have not been faced in modern densely populated Australian urban environments. The initial approvals for the M4 widening, M4E, & New M5 have highlighted limitations of the review of approval mechanisms, when modelled projections and predictions are contradicted by the actual outcomes. The public have discovered that there are multiple restrictions to gaining satisfactory resolutions to problems, because the proponent responds that they are working within approvals already granted.

Whilst the initial approvals may have been granted based on information that the Minister received at the time, subsequent experience has demonstrated that many concerns raised by responders to the M4E and M5 EISs were in fact accurate. Now the Minister must acknowledge the actual experiences of residents affected by projects to date.

**We recommend that the Minister ensures that Westconnex current projects modify practice through revised conditions of approval and that new projects operate under more stringent and socially responsible practices.**

Constructive Suggestions that are embedded throughout this submission and are listed, with some additional ideas below.

#### **Recommendations for consideration PRIOR TO ANY APPROVAL**

**We recommend that DP&E confirm and ensure that EIS uses the most up to date information about the population and relevant health statistics. The EIS needs to ensure that it is considering the current health of the existing population living along the project route**

**We recommend that it is confirmed when noise measurements were taken across the M4-5 link footprint. If the measures relied on for this EIS include those taken several years ago, then there needs to a review and re-assessment of the baseline measures obtained, so that modelling can be based on the current environment of sound dispersal.**

**We recommend that, as part of the conditions of approval, there be no commencement of works unless mitigation measures are available and ready to be installed i.e. mobile sound walls closer to source of sound (sound blankets on mobile cages able to be moved and positioned closer to the source of sound, better baffling than we have experienced with the M4 East) acoustic covering of jet fans and ventilation equipment. Also note the use of containers as a sound wall on New M5 site near airport.**

**We recommend that the DP&E planning assessment and approval team for the M4-M5 consults with residents directly from along both the M4 East and New M5 routes about their lived experiences of WestConnex building, PRIOR making a determination on the M4-M5 Link application.**

**We recommend that DP&E assessment and approval team run a series of workshops with residents, from different locations, who have or are willing to**

**engage with the EIS PRIOR to approval and AFTER release of the Preferred Infrastructure Report.**

**We recommend that approval not be granted on the basis of this EIS. The proponent needs to review, revise and re-submit the EIS to DP&E so it can be re-exhibited, in combination with the Preferred Infrastructure Report to ensure proper public engagement.**

**We recommend that, as part of the conditions of approval, there be no commencement of works unless mitigation measures are in place, i.e. mobile sound walls closer to source of sound (sound blankets on mobile cages able to be moved and positioned closer to the source of sound, better baffling than we have experienced with the M4 East) acoustic covering of jet fans and ventilation equipment. (Also note the use of the containers as sound wall on New M5 site near airport.)**

**We recommend that as part of the conditions of approval, improved communications and complaints mechanisms are developed and implemented as part of any approval process.**

**We recommend that, as part of the conditions of approval, there is local project public liaison officer in at every construction site or area. Residents need to be able to make direct contact, in person, and not just through a service centre.**

**We recommend that as part of the conditions of approval, an independent and co-ordinated complaints system is established, possibly under the jurisdiction of relevant local Councils. This would serve as a One stop system that can accommodate phone, letter, email, or in person complaints, with support and follow capacity provided.**

**We recommend that as part of the conditions of approval DP&E establish and auspice neighbourhood group meetings and liaison, between local residents with relevant construction and project employees.**

**We recommend that as part of the conditions of approval there are regular, advertised weekly/monthly resident drop in sessions held either on site, or in the local area with: DP&E compliance team and post approval teams, EPA reps, IWC Westconnex Unit, (and on a quarterly or six monthly basis inviting reps from Safe Work NSW, RMS, TfNSW, Transport Management Centre, SLHD, Primary Health Network, and technical and senior people from the contracted project builder (not just employees from community engagement team). The project builder should be required to finance the administration of these sessions.**

**We recommend that as part of the conditions of approval that there are up to date project community notice board at each construction site, and also central project notice boards in other suitable locations, i.e. shopping centre, library, civic centre.**

**We recommend that, as part of the conditions of approval, all project, utility and associated work slip notices, letters, notifications, published public notices, Agency and Government notices and letters (gazetted or not) as well as the Local Updates should go onto a community notice board as well as a website.**

**We recommend that, as part of the conditions of approval, there are hardboard and illuminated pedestrian notices re detours, road changes and bus stop closures or relocations.**

**We recommend that, as part of the conditions of approval, there be no construction work or utility work unless noise and dust mitigation measures are in place.**

**We recommend that, as part of the conditions of approval, there be no use of off road diesel equipment (eg Diesel generators).**

**We recommend that, as part of the conditions of approval, Indoor air quality monitoring occur inside nearby schools and homes, prior to and during the project life.**

**We recommend clarification of the project PM burden on buildings over 3 storeys upon air quality, and new developments and concentration of high rise buildings along transport corridors. (CAUL, [www.nespurban.edu.au](http://www.nespurban.edu.au) and the Woolcock Institute, <https://woolcock.org.au> )**

**We recommend clarification of PM burden from the project and reasons for locality based PM burden referred to in the EIS.**

**We recommend that as part of the conditions of approval, that appropriate independent regulatory, supervision and compliance resources are funded by the proponents and provided, to ensure that conditions of approval are observed and met at all times.**

**We recommend that, as part of the conditions of approval, there be substantially improved communication with blind, vision impaired, deaf or hearing impaired, non-English speaking, or English speaking but functionally illiterate people, as well as residents who are socially isolated, or with limited mobility.**

**We recommend that, as part of the conditions of approval, there be substantially improved liaison with tenants, public or private.**

**We recommend that, as part of the conditions of approval, there be proper induction, training and better supervision of road traffic controllers.**

**We recommend that, as part of the conditions of approval, there be regular mandatory disability audits from qualified person/service re all aspects of project impacts in local community – (a safety officer from the M4 East project**

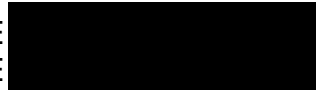
has admitted he was not qualified to assess and make appropriate suggestions on this topic).

**We recommend that tolls only be increased in line with the CPI.**

**We recommend that the Minister ensures that Westconnex current projects modify practice through revised conditions of approval and that new projects operate under more stringent and socially responsible practices.**

Yours sincerely

Victor Storm, E  
Sharon Laura, E



References:

Woolcock Institute: *Review of the health impacts of emission sources, types and levels of particulate matter air pollution in ambient air in NSW*, can be viewed on the CAR website: <http://www.car-cre.org.au>

Sunyer J, Esnaola M, Alvarez-Pedrerol M, Forns J, Rivas I, López-Vicente M, et al. (2015)

Association between Traffic-Related Air Pollution in Schools and Cognitive Development in Primary School Children: A Prospective Cohort Study. *PLoS Med* 12(3): e1001792. doi:10.1371/journal.pmed.1001792

Sunyer J, Suades-González E, García-Esteban R, Rivas I, Alvarez-Pedrerol J, Forns J, Querol X, and Basagaña X, (2017)

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Alvarez-Pedrerol M, Rivas I, Lopez-Vicente M, Suades-Gonzalez E, Donaire-Gonzalez Da, Cirach M, de Castro M, Esnaola M, Basagaña X, Dadvand P, Nieuwenhuijsen M, Sunyer J (2017)

Impact of commuting exposure to traffic-related air pollution on cognitive development in children walking to school *Environmental Pollution* 231 (2017) 837e844, <http://dx.doi.org/10.1016/j.envpol.2017.08.075>

**Director, Infrastructure Projects, Planning Services  
Department of Planning and Environment  
GPO Box 39 Sydney NSW 2001**

**Application Number: SSI7485**

**WestConnex M4-5 Link from Haberfield to St Peter's with additional connections to the Iron Cove Bridge & Rozelle Inter-change.**

We are happy to clarify or discuss any of the issues that we have raised in our submission. We look forward to your considered response. We request that our names and objection be noted and recorded and that our submission is made publicly available.

We object to this application SSI7485.

Specifically, we write to object to what the EIS presents in Volume 1A, as an accurate synthesis of how issues can be best managed within the M4-M5 project proposal. Our remarks focus particularly on the Haberfield/Ashfield end of the project proposal. It is also informed by our experience as a resident of Haberfield, living with the ongoing impacts of the M4E project on our daily lives.

One major observation throughout volumes of the EIS is that there are major gaps in synthesis between the different Westconnex projects. The M4E EIS was written long before consideration of the M4-5 link. At times the M4-5 link EIS refers to material as sourced from the M4E EIS. However in many instances there is lack of detail and analysis of the impacts of the combined projects. So there is no wholistic overview, which makes understanding local impacts for both Haberfield/Ashfield and St Peter's difficult.

What follows are both comments and questions. Many of the questions remained unanswered from the M4-5 link public consultations. The comments are observations from the EIS. The fact the proponents have not been able to answer these questions suggests the current EIS is inadequate and substantial revision before it can be considered. The questions need to be answered in the EIS.

## **Executive Summary**

We object that this putative summary makes multiple assertions and claims that are not borne out in the actual EIS. This 'summary' is more a wish-list of claims, rather than a summative analysis of the EIS documents. The following deficits/errors are identified by page.

**Page iii:** We object that the Summary discusses 3 new ventilation facilities, but underplays the extension of the already built stacks with only mention of PRVF mechanical & electrical fitout at Haberfield & similarly St Peter's.

**Page iv:** Delivery mechanism for design & construct M4-5 differs from M4E and new M5, where the contractor had already been appointed. Prior EISs actually assessed the project contractors design proposals.

“The delivery mechanism for the design and construction of the M4-M5 Link differs from the approach adopted for the M4 East and New M5 projects. For the M4 East and New M5 projects, a design and construction contractor was appointed early and had direct input into the design development, environmental impact statement (EIS) preparation and construction planning for those projects. This meant that the EIS for the M4 East and New M5 projects assessed the construction contractor's design. For the M4-M5 Link project, design and construction contractors would be appointed to undertake the detailed design and construction planning following determination of the application for project approval, should it be approved.

This means the detail of the design and construction approach presented in this EIS is indicative only based on a concept design and is subject to detailed design and construction planning to be undertaken by the successful contractors. The intent of the concept design for the project is to provide a sound and clear basis for refinement during the detailed design to a standard required to minimise impacts of the permanent infrastructure as much as possible.”

We object that the concept design will not allow proper consideration of what is proposed to occur.

**Page vii:** We object that the project has been declared SSI at this juncture, given the ad hoc “decision” making processes. (eg critique by the Auditor General etc)

We object to the fact that proper consideration of public transport options was not permitted in the analysis of integrated transport solutions for metropolitan Sydney

**Page viii & ix:** How did the community participate in selecting the preferred project?

We object that this report mis-represents that community advice session from 2012 can be interpreted that the community was involved in selection of the preferred project. The consultation sessions ignored the majority of local residents' & comments and objections.

What evidence is that there were business impact surveys conducted in Ashfield & Haberfield?

“Permanent communication channels have been established for the WestConnex program of works and the project, to seek input from stakeholders and communities and to support ongoing engagement”

We object that there is no evidence to support this assertion?

**Page x: Construction Impacts**

We object to the proposal that only limited on-site parking for construction workers will be provided at some construction ancillary facilities, without a proper alternative transport mechanism for workers.

We object that additional parking opportunities will be investigated only during the detailed construction & design planning, in order to provide additional parking & minimise on street parking around construction sites.

We object that City West Link & Wattle Street will suffer intersection failure due to increased Westconnex traffic

“A CTAMP will be developed prior to construction commencement as part of CEMP”. How will it be different from the M4 E experience; given the failure of CTAMP in past projects?

**Page xi: Management of potential operational impacts**

We object to the delayed assessment of impacts at 1 & 5 years after the project is completed

**Page xii: Air Quality**

We object that “Dust soiling” and effect of air borne particles on human activity & amenity is inadequately addressed.

What will be done differently for the M4-5 project, given the failure to manage these detrimental problems with both M4E & M5 projects?

**Page xiii:** We object to the assertion, without clear evidence that air quality will improve to the SE of PRVF post construction. Traffic in Parramatta Road to the east of the portals will be more congested than prior to the project & similarly in Dobroyd Pde.

“Modelling of the changes in air quality for elevated receptors (such as apartment buildings) showed that there would not be any substantial impact on existing buildings.”

We object to this assertion when there is clear evidence in both Chapter 11 and Appendix K that there are problems in air quality above 10 metres induced by the Westconnex exhaust stacks.

**Chapter 1 Introduction**

## **Project overview**

“1-1 This chapter provides a brief overview of the M4-M5 Link (the project), including its location and key features. This chapter also describes the purpose and structure of this environmental impact statement (EIS).”

“The M4-M5 Link is part of the WestConnex program of works. Separate planning applications and assessments have been completed for each of the approved WestConnex projects. Roads and Maritime has commissioned Sydney Motorway Corporation (SMC) to deliver WestConnex, on behalf of the NSW Government. However, Roads and Maritime is the proponent for the project.”

We object to the false portrayal of these projects as integrated planned entities. The process has been one of sequential adhoc decisions that have never been articulated in a clear manner. The multiple changes are such that the original articulated intent of a link to the port & airport, is yet to be achieved.

”This means the detail of the design and construction approach presented in this EIS is indicative only based on a concept design and would be subject to detailed design and construction planning to be undertaken by the successful contractors. However, the design developed by the contractors would need to be consistent with any environmental management measures, changes identified in a Submissions and Preferred Infrastructure Report, the conditions of approval for the project and other requirements identified during the assessment of the project. Issues raised during public consultation on the EIS or in the assessment of the project by NSW Department of Planning and Environment (DP&E) would also be taken into account during the detailed design process.”

We object that this process is being deliberated in such an information vacuum. The public cannot provide informed comment, nor can the Minister deliver informed approval based on this concept design. This is an abuse of the EIS process.

### **1.3 Purpose of this EIS**

Figure 1-3 provides a confusing directional orientation description does not reflect actual geographic orientation. The public and project team have all been confused by the convention described in this figure

## **Chapter 2 Assessment process.**

This chapter describes the planning approval process for the m4-5 link project (the project) as well as other environmental, planning & Statutory approval requirements.

This EIS is just a concept plan. The preferred infrastructure report needs to be released for public consultation considered as part of any EIS approval mechanism.



The SSI nature of these agglomerated projects means that usual rules of governance and review do not apply. This means that any faults or errors that occur are then not addressed in the usual manner, which would give public confidence in the public administration and governance of this major set of projects. (eg failure to remedy the odour & air pollution at St Peter's)

### **Approval framework 2-1**

I object to the inconsistency within the EIS documents, for example page 8 Figure 2-1, Assessment & Approval process differs from the same named page 4, Figure 1-2 Project Synthesis, Appendix A. This suggests that much material within the EIS has been cut and paste from prior documents & has not been checked for internal consistency.

I object that Table 2-1, 3 SEARS, assessment of key issues, the Ministry of Education was not consulted and asked to comment on the impacts of these projects. There has not been an assessment of the impact of this project on schools.

### **Chapter 3 Strategic context and project need**

This chapter describes the strategic context of the M4-M5 Link project (the project) within the state and national planning and policy framework, explains the need and justification for the project from both regional and local perspectives, and outlines the project's objectives.

We object that this chapter fully incorporates the range of material that should be considered. It does not address some of the high level considered critique of the project and underlying assumptions.

### **Chapter 4 Project development and alternatives**

This chapter describes the alternatives to the M4-M5 Link project (the project), as well as the options that were considered as part of the design development process. It explains how and why the project design was selected as the preferred option for assessment in this environmental impact statement (EIS). Design options and refinements for particular elements of the project are also addressed, noting that the project described and assessed in this EIS is based on a concept design that is subject to further refinement during detailed detail and construction planning, as described in Chapter 1 (Introduction). This chapter aims to:

- Provide a brief history of the development of the WestConnex program of works and the project
- Describe the strategic alternatives to achieve the project objectives that were considered
- Summarise the project evolution and design refinements for the key components of the project

- Outline the approach to the staging of the project including for construction of the mainline tunnels and Rozelle interchange, and within the overall WestConnex program of works
- Describe the options development process for permanent and temporary infrastructure, facilities and processes
- Summarise the preferred option assessed in this EIS

### **Consistency:**

THE EIS is frequently inconsistent between chapters & appendices

Further the notion of consistency for approval purposes, is that the basis for approval with M4E & M5, has been within such broad parameters, that almost all future changes are “deemed” to be “consistent” with the project application, that these are given approval under consistency status without public scrutiny or review.

This EIS should not be approved in its current pre-design form and given this blank cheque “consistency “ approval.

### **Chapter 4 Options**

This chapter fails on multiple fronts, but most specifically because it proposes 2 new options that do not meet the SEARS requirements for project development & construction. It also neglects to consider the previously endorsed and feasible option that would involve NO additional above ground site options in Haberfield. The failure to acknowledge the promise made to local residents to incorporate a feasible and reasonable option is a major breach of community trust and the furphy of Option A & B, is also flawed, when the project director clearly wants to have a more extensive hybrid of both options, which is not detailed in the EIS.

This section which underpins much of the EIS, is inaccurate and does not portray accurately the development of the project. We object that the alternative promised to the community at M4E consultations of no above ground construction in Haberfield/Ashfield has not even been considered in tis EIS. We know it is both a feasible & reasonable option.

**Table 4-3, page 25**, gives a description of active transport initiatives and improvements outside of the project scope (Parramatta Road, Greenway etc). We object that these initiatives are not integrated into the project.

## Chapter 5

**Project description:** “This chapter describes the M4-5 link project, (the project), including the project tunnels, Interchanges and associated infra-structure and ancilliary facilities. It also describes the design standards and construction activities required to deliver the project.”

We object that this just a concept design and that it has not been designed to minimise impacts on residents of Haberfield or Ashfield.

We object to the staged construction and opening of the project, and that the total construction period for both stages of the project (1:Haberfield-St Peter’s tunnel & 2 Construction of Rozelle interchange and Iron Cove link) is expected to be 5 years or more. This creates unacceptable impacts on the community p5-8)

**Question:** Who will have overarching control and responsibility, (contractor or RMS/TMC), timing and duration of: the ‘Minor’ physical integration works with the road surface network at Wattle St interchange including road pavement and line marking and the Upgrade of intersection at Parramatta Road and Wattle Street, to allow extra right hand turn, from Wattle St westwards?

**Question:** What is the grade of the connector tunnel from Wattle St ramps to the mainline tunnel? Are the Wattle St ramps one of the ‘isolated locations connecting to the road surface requiring ‘short length of steep grades up to 8%’?

**We Request** identification of where road surface connections where the grades are higher than 4%?

**Comment:** Chapter 5 describes key elements of the project, based on the concept design. And that the concept design would continue to be refined where relevant to improve the road network and safety performance, minimise impact on receivers and the environment, and in response to feedback from stake-holders.

**We Object:** That the EIS is an inadequate concept document.

**We Request:** Release of PIR with exhibition period. Also regular review of RELEVANCE of conditions of approval, with revision of conditions as required, especially in response to resident experience as the project proceeds

**Table 5-3, p 5-18.** Urban design objectives & proposed methodology to achieve these objectives NOTE There is an absence of any reference to the Sydney Water, Iron Cove Creek renewal program. This has been brought up with the project team on a number of occasions over the past 5 months.

**P 5-19,** UDLPs for M4E & M4-5

We object that the implementation & M4E & M4-5 link UDLPs & M4E Legacy Projects will be impacted by the M4-5 proposals, causing an implementation delay of 5 years or more.

There has been a failure to communicate clearly to the public the nature and extent of the project tunnelling (ie deep main line tunnelling & the graded connector tunnels figures are not clear)

### **Section 5.3.1**

Where are the workers from the Inner West subsurface interchange going to park?

**P 5-25, 5.3.3,** Emergency and Breakdown facilities

Reference is made to Emergency & Breakdown facilities at Rozelle & Iron Cove Link, but does not describe how these are provided around the Haberfield & Wattle Street interchanges. If this has been detailed in the M4 E EIS, this should be referenced.

There is no analysis of how emergency vehicles would gain access to the tunnels in the event of an emergency, particularly if surface roads were congested.

**P 5-40** Connections to other WCX projects

**P 5-52,** Whites Creek, Annandale at the Crescent

THE M4-5 link does not identify impact of the project on the Iron Cove Creek

**P 5-58** UDLP & transport integration for Rozelle

There is an absence of any discussion of the UDLP implications & transport integration for Ashfield/Haberfield interchanges.

**P 5-76 Table 5-7,** Summary of Motorway operations complexes and ancillary infrastructure

We object that PRVF (note 3) & St Peter's facility (note 4) are not included on this table. The colocation of facilities fails to fully integrate the impact of these serial projects and relegates the true impact & extent of the project

**P 5-82, 5.8.2 Ventilation System and facilities, In tunnel Air Quality, Design Criteria**

These are based on the conditions of approval for the M4E & new M5, which assume free flowing traffic at 50-100 km/hr. Both Rozelle & Haberfield interchanges will involve entry/exit portals with steep grades; this will increase emissions significantly at exit and will also be associated with exit traffic congestion. The working assumptions for these portals need closer scrutiny and better evidence.

**P 5-84 Table 5-8, Key components of the project's ventilation systems**

There is lack of description of how the PVRF will operate and function. This compares with the slightly greater information given about the Campbell St facility. (Does the lack of M4 E information mean that the M4E Team have not provided information to the RMS to assist EIS development?)

**P 5-89: Posted speeds within the tunnel**

How effective will piston movement of air ventilation be, when cars are in exit portals, exiting onto Parramatta Rd, Dobroyd Parade and Wattle St/Frederick St. What will be the congestion induced Road Traffic pollution at these sites?

We object that these pollution hotspots have not been adequately modelled in the EIS.

**P 5-90 5.8.3, Fire and fire safety**

Cross tunnel passages every 120 m; what disabled access provisions are there for this access? What consultation and modelling has there been with emergency services in the development of evacuation procedures? There needs to be appropriate resources to enable evacuation of people with limited mobility, including disabled, frail elderly and young children (wheel chairs & other aids in tunnel)

We object that disabled support requirements are not detailed in the EIS in the event of emergencies.

**P 5-91, Ventilation systems**

There needs to be greater information on this design to ensure smoke ventilation is adequately developed.

**P 5-92, Water supply to PVRF**

Will the PVRF require additional land for its water supply pumps or is it within the current project foot print?

**P 5-94, 5.8.4, Operational Management**

Modification proposed for WDRS facility at Homebush.

How will coordination & integration be ensured in the event of a disaster for good governance systems and resource application. The experience to date, of the failure of RMS, JVs and utility providers to coordinate in non-emergency settings, does not instil confidence.

**P 5-95, 5.8.7, Air Quality Monitoring**

Cross check manual monitoring proposals mentioned are detailed in Chapter 9.

(this is a general concept that applies in all cross referencing; there needs to be verification)

**P 5-98, 5.9.1 Tunnel Drainage and treatment infra-structure**

Is there any drainage or water treatment plant for the M4-5 at Haberfield or St Peter's? Or are they just reliant on M4E & M5 project design. The EIS needs to be detail of the proposals for M4-5 stormwater & drainage management at both ends of the project

**P 5-99, 100:**

Table 5-10 details impact on White's Creek water naturalisation program; however no mention of integrating this project into the implementation of the Iron Cove Naturalisation project

**P 5-100; Pavement drainage & storm water treatment**

The M4E EIS did not deal with these issues; so where is the recognition of the impact of the M4-5 link on these requirements in Haberfield/Ashfield. What sediment & pollutant management controls will be there Iron Cove Creek. Page 101 does not address these issues.

**P 5-101, 5.9.3: Noise Mitigation & Attenuation**

This fails to address cumulative, sequential and parallel of noise impacts of multiple sites.

**P 5-102, 5.10: Utility Services**

What is different from the experience of the M4 E to what is proposed for M4-5. Appendix F is light on detail & the proposal should be left to the detailed design to draw up the principles of how this will work.

There are no details on power capacity requirements for Haberfield. However it is assumed that free flowing traffic conditions will apply. Cross check where is the power source PVRF, mainline tunnel and Wattle St inter-change? Appendix F. It is not documented in chapter 5

**P 5-105, 5.10.2 Water**

*Will water tank requirements take any further space at PVRF footprint in Haberfield? This is not clear in the EIS.*

**P 5-105, 5.11, Table 5-12:**, Indicative Property Acquisition required for the project

Haberfield and St Peter's acquisitions relegated to foot note. The impact of this project on communities is just ignored and denies what has occurred. The acquisition of shops on Parramatta Rd appears to have been ignored, alongside the Muir's multi title acquisition. This denial of impact is an insult given what Haberfield and Ashfield have been subjected to.

## **Chapter 6 Construction work**

It is essential that construction activities are not added to, by project creep and deemed "consistent", so further scrutiny and review of such work is not "required"

"This chapter describes the proposed approach to the construction of the project. It outlines the proposed construction program, footprint, methodology, working hours, materials, equipment, traffic management, spoil haulage routes, and temporary construction and ancillary facilities. This chapter is based on methodologies developed to construct the project described in Chapter 5."

SEARS Table 6-1

The EIS states the proposal is designed to minimise impact on local residents.

We object the proposals in this EIS fail to meet requirement.

**P 6-4, 6.1.1:** General

The current EIS fails in a number of ways to meet its objectives, because of its failure to minimise adverse social, environmental and economic impacts, including its cumulative impacts in Haberfield/Ashfield. This is because it fails to recognise a reasonable & feasible alternative approach to the construction of the project by only proposing Options A & B in Haberfield/Ashfield. It should have considered the alternative promised option of no additional above ground construction sites.

It fails on each of the General Principles.

**P 6-6,**

Refers to M4 E & M5 EISs, without referring to any details.

**P 6-8, 6.2:** Construction Program, Table 6-2

I object that this section lacks any diagram of the preferred hybrid option for Haberfield/Ashfield

**P 6-20, Table 6-3: Overview of construction activities**

Note: site establishment works are to occur before substantial construction; are these identified in any of the site time line activities by quarter.

What are the depths of connector and any temporary access tunnels? The public need to know these details? **Table 6-11, p 6-24** does address some of this. This is also due to overlapping impacts of M4 E and subsequent M4-5 tunnelling. The impacts of M4 E tunnelling to date have been significant for many residents as the tunnels link to portals .

**P 6-32, 6.5,**

We object that the proposals are yet to be determined and would only be defined after approval has been given. We object that further ancillary facilities can be approved after the contractor is engaged. All ancillary facilities must be developed before approvals are given.

**P 6-35, Table 6-5**

Some developments may be undertaken as enabling works: does this mean it is being costed to other agencies, and will different management and control systems be utilised. Who will be responsible and manage these overall activities & impact.

**P 6-37, 6.5, Table 6-6, Wattle Civil & Tunnel Site (C1a), Commence Q3 2019, Finish Q4 2022**

This construction program talks about Wattle St Entry & Exit ramps for M4-5, discusses (p 6-37) what is practicable, reasonable & feasible to consider in the provision of acoustic barriers and devices.

We object that it could even be considered NOT reasonable to do this?? It should be mandatory at all sites to do this.

The word "reasonable" is quite subjective and should not be used in conditions of approval as it is too general & non-specific.

**Q= quarter of the year ie 3months)**

**P 6-46, Table 6-9, Parramatta Road West Civil & Tunnel Site (C1b), Commence Q4, 2019 (nine months earlier than C1A) Finish Q2 2022 ( six months earlier than C1a)**

This can start earlier, hence its attractiveness to the proponents, but will inflict more suffering on residents than promised below ground options.

**P 6-41, Table 6-7, Haberfield Civil & Tunnel site (C2a), Commence Q3 2019, Finish Q4, 2022**

This just adds 3 activities (Below ground site set up; Establish Temp Ventilation systems for Wattle St & mainline & Tunnelling to site proposal below. The access will be the already established ventilation shafts currently being built for M4E. Spoil will stored in M4E Stub



tunnels (do they mean the M4-5 stub tunnels?) & then be removed via the M4E tunnels; there will be no above ground truck movement removal of spoil with this option.

**P 6-48, Table 6-10**, Haberfield civil site (PVRF) (C2b), Commence Q3 2019, Finish Q3 2022

**P 6-43, 6.5.4, Table 6-8**, Northcote Civil site (C3a), Commence Q4 2019, Finish Q4 2022, 13 Qs

This project would run for 3 Qs ( 9 months) less than C3b; so would have shorted impact on residents. It is on land already established for an ancillary site, but still does not fulfil the promised option. The other reason that this option is not preferred, is that the land could be possibly sold off for other purposes.

**P 6-50, 6.5.7, Table 6-11**, PRE civil site, Commence Q4 2018, Finish Q3 2022, 16Qs

Longer time frame; but can start earlier

Overall, there is no table that details the duration of time that M4-5 entry/exit ramps on Wattle St would be used in the B option. It is not easy to analyse the impact of options A & B. Main difference is that option B can commence earlier, although overall the work goes on for longer, which means the B option will have increased cumulative impact on more people

**P 6-45, 6.5.5**, PRW(Ashfield) civil and tunnel site (C1b)

We object that Acoustic impacts are dealt with in superficial manner. It suggests acoustic mitigation may be undertaken. It must be a requirement.

We object that the notion of roller doors as acoustic management, to “minimise noise”, does not suggest a formal approach or analysis has been considered or understood.

We object that the impact of this site on the substantial pedestrian traffic that goes to and from Haberfield PS is not addressed. Would they construct a pedestrian bridge over Parramatta Rd at Alt Street.

We object that project overlap is not clear. The community needs this to be clarified with all options. What is the overlap between the M4E & M4-5 link? EIS says a 6 month overlap, but the tables suggest a 9 month overlap at minimum with Option B. If it is the end of 2019 it would be a 15 moth overlap. When is M4E is now projected to finish?

No mention of Preferred Infra-structure report in Haberfield section. We must bring this requirement of the PIR to be made public.

**P 6-52**, Spoil Haulage from Darley Road, Rozelle, theCrescent through Haberfield via CWL. Pyrmont Bridge Rd will go down Parramatta Rd (Will they then enter the M4 E tunnel at Haberfield?)

## **6.8 Traffic Access and Management**

**P 6-73, Table 6-19, Indicative Road network *modifications***

We object to removal of curb side parking in Alt St & temporary closures in both Bland & Alt St. There needs to be improved road traffic management, compared to M4 E experience. We do not want access closed off at night time.

**P6-78, Table 6-20, Indicative modifications to pedestrians and cyclist facilities during construction**

We object that it is not identified what is different and planned for M4-5 link project, compared with the lived experience of the M4 E project.

How will the CTAMP be useful and support the needs of local residents? There needs to be improved pedestrian signage and access for people with visual impairments or mobility access issues.

Are road traffic controllers contractors, staff or sub-contractors? All road traffic controllers require skilled induction, with awareness and sensitivity about the impact of the long term project on residents. This needs to be documented properly within conditions road traffic control contracts.

**P 6-83, Table 6-22, Indicative Construction vehicle numbers**

**P 6-84, Table 6-23, Indicative Spoil haulage routes**

Is it reasonable that heavy truck movements occur out of hours. How is this consistent with the project aim to minimise impacts on residents.

We object to this vague notion. We require that all heavy truck movements cease after routine construction hours, to allow children uninterrupted sleep.

**P 6-85 “Exceptional circumstances”.** There needs to be an independent authorised officer who can determine if the application of exceptional circumstances can legitimately apply. However this should not be a regular and routine action.

**Table 6-24, Alternative spoil haulage routes (during exceptional circumstances)**

Site C1b & C9 : are proposed to go around the Taverner’s Hill loop onto Old Canterbury Road. Would Truck & Dogs make all those bends? Check with Council

**P 6-86, Figure 6-26, Indicative Spoil Haulage Routes Wattle St & Haberfield civil & tunnel sites (C1a & C2a)**

**P 6-87, Figure 6-27, Indicative spoil haulage route, PRW civil & tunnel (C1b)**

**P 6-92, 6.6.6, Construction workforce parking**

Option A Northcote St (C3a), 150;

Option B PRE (C3b), 140

We object to these proposals for construction worker parking.

Is it proposed that the sites in Haberfield will be used as shuttle bus stop for workers at Darley St & Pyrmont Bridge Rd. How will the former Five Dock RMS site be utilised? What is the Motor Registry site going to be used? Other options should be explored. A condition of approval must be that construction cannot commence until an approved parking management plan is completed and endorsed by IWC.

However the majority of workers are coming by car & parking in local streets. They also use construction vests & helmets in the adjacent set to make it appear that someone is sitting in the set, when in fact there is only one person.

**P 6-93, 6.7, Construction Workforce Numbers & Work hours**

Table 6-25, Peak construction workforce estimates, **140 day shift & 90 night shift at C1b!!**

These figures do not make logical sense between the 2 options; there are discrepancies.

Comment: nowhere in the EIS does it analyse the cumulative and overlapping (M4E & M4-5 link) work force & parking requirements, combined truck movements or other impacts. This needs to be addressed and is a FAILURE of this EIS.

**P 6-94, Table 6-26, Construction hours**

What is the nature & extent of proposed rock breaking? Is this the same as rock crushing??

Given the failure of both M4 E & M5 projects to minimise disruption on residents and the now extended and prolonged nature of these cumulative projects, there should be a curfew on all works from 10 pm. There should be no heavy truck movements after 6 pm, and if urgent out of hours work is required, then the RMS/TMC should permit road occupancy from 7pm, to be finished by 11 pm.

The EIS does not include the associated utilities work impact, with impacts on worker numbers & parking; traffic movement. This lack of integration into the EIS is a deficit on cumulative impacts of M4-5, M4E & associated utilities work.

**P 6-95, Table 6-27, Construction work hours at construction ancillary facilities**

**P-6-96, Works outside of standard construction hours**

Straw polls of residents with 2 options; how is agreement reached? How will people with a language other than English be consulted & how much notification will there be? This requires safe guards.

Unanswered questions from Exec Summary and Chapters 1-6

**P 6-97, 6.8, Construction Noise Attenuation**

No noise attenuation measures are spelt out for PRE civil site; extra high noise barriers; will need to be 4 -5 m high

**P6-98, Table 6-28, Indicative construction plant equipment**

Multiple diesel generators, which are highly polluting, are located in all sites. How would the both the noise & emissions be managed? (Woolcock Report) There has been significant failure to manage the impact of generators on residents with the M4E project.

Victor Storm E 

Sharon Laura E 

16 October 2017