



Attention: Director, Transport Assessments
Planning Services
Department of Planning and Environment
GPO Box 39 Sydney NSW 2001

application number SSI 7485 – WestConnex M4-M5 Link

October 2017

WestProtects Rozelle is an apolitical community group established to protect our community in the event that WestConnex M4-M5 Link proceeds.

We wish to state the strongest opposition to the M4-M5 Link. We oppose this project given its significant environmental, public health, traffic, construction and financial impacts as well as the endemic lack of adherence to proper planning principles.



Process Issues.....	3
Air Quality and Unfiltered Ventilation Stacks.....	3
Vehicle exhaust	5
Filtration and real-time monitoring	5
Cumulative air quality assessment	5
In-tunnel emissions	6
Impact of steep tunnel gradients in Rozelle	6
Surface road emissions.....	7
Design of ventilation stacks	7
Mitigation of proposed Iron Cove Link.....	7
Retention of Easton Park	8
Tunnels	9
Remediation of the Rozelle Rail Yards	9
Monitoring	10
Dust	10
Noise and Vibration Impacts from Construction.	11
Night Lighting Impacts during Construction	12
Inadequate pedestrian access to the Rozelle Interchange Park and across Victoria Road and the City West Link.....	12
Restriction of Public transport options for White Bay/Balmain light rail and Western Metro rail.....	12
Use of Rozelle Rail Yards as the main construction site for the M4-M5 Link.....	12
Truck Marshalling Yard and Management of Construction Vehicles.....	13
Minimising the impact of construction	13
Impact on Haberfield.....	14
Landscaping	14
Ensuring respite from construction including through the Coordination of Utilities so as to maximise “no work” periods for residents.....	15
Co-ordination of project-related utilities work	16
Conditions of Approval must reflect those of Sydney Metro (rail) project.....	16
Cumulative noise impact assessment	17
Management of Excavated Material.....	17
The creation of up to 10 hectares of new public open space in the Rozelle Rail Yards...	17
Groundwater and Settlement Relevant Criteria	18
Settlement Relevant Criteria.....	18
Detailed process for repair of damage to homes	18
Darley Road Construction Site	19
Signage.....	19
The Acquisition process	19
CONCLUSION	20



Process Issues

We are deeply concerned at the severely constrained consultation time of just 60 days, given the complexity and impact of this project and the 7000-plus page EIS document (a document which does not even contain final design so that we may be in fact providing feedback on a project which take a completely shape if and when contractors are engaged). The provision of just nine working days between the close of exhibition of the Concept Decision and the start of the EIS is risible (and offensive).

We echo the position of the Inner West Council namely that Stage 3 should not be approved and that an independent inquiry must be held to identify, investigate and resolve the multiple flaws in all stages across both construction and planning. The need for this inquiry is further fuelled by the findings of IWC's expert consultants, BECA, who raised serious concerns about the assumptions that have guided the EIS's traffic and air quality modeling as well as the absence of the specific nature of construction impacts.

Additionally, we wholeheartedly support Council's request that assessment of Stage 3 must be suspended until 1) this inquiry has been held; 2) any deficiencies in the current EIS are addressed and 3) the Preferred Infrastructure Report has been publicly exhibited (to allow genuine consultation and community feedback on what is actually going to happen).

We also note the commitments from the highest levels of NSW Government that lessons have been learned from Stage 1 and 2. For this promise to be more than just lip service, conditions of approval must be strengthened, construction practices must be improved and incidences of non-compliance reduced.

Air Quality and Unfiltered Ventilation Stacks

The proposed siting of large, unfiltered ventilation stacks on Lilyfield Road, Victoria Road and in the Rozelle Rail Yards in close proximity to schools and homes is of major concern. These concerns clearly extend to the other unfiltered ventilation stacks proposed in Haberfield and St Peters as part of this project as well as in Stages 1 and 2.

There is overwhelming evidence of the toxic impact of polluted emissions.

The NSW EPA states in its recent Clean Air Consultation Paper on p10:



The public health impacts and costs of air pollution and, conversely, the benefits of reducing people's exposure to air pollution are substantial. Each year, air pollution leads to:

- *520 premature deaths and 6300 cumulative years of life lost in Sydney (Morgan et al. 2013)*
- *1180 hospital admissions in Sydney (Broome et al. 2015), and*
- *an estimated \$6.4 billion (2015 AUD) in health costs in the NSW Greater Metropolitan Region (Dec 2005).*

As there is no safe threshold for exposure to fine particles, continued reductions in exposure can reduce adverse symptoms, need for medication, visits to doctors and emergency departments, hospital admissions and premature deaths across cities and communities.

Studies continue to emerge highlighting the deleterious impact of air pollution on our health including the findings published in *The Lancet* in 2016 which found there was a 7 per cent higher risk of developing dementia among those living within 50 metres of a main road, a 4 per cent higher risk at 50-100 metres, a 2 per cent higher risk at 101-200 metres, and no increase in risk among those living more than 200 metres away.

Given the content and quantum of dangerous emissions and the reliance on the emission points being sufficiently high for dispersal, this project has dangerous health ramifications not just for those communities which are being directly impacted by WestConnex but for wider Sydney as a whole. Within our community alone, there are numerous schools and pre-schools within the areas of heaviest potential fall-out.

Rozelle already has the most polluted air in Sydney and has exceeded the Health Department safe limits on several occasions in recent years. (Pead, S. 2012)

In addition the area is subject to air pollution (and noise) from cruise ships (and others) in White Bay, which run diesel engines (with low quality) fuel) to maintain their power supplies. Marine pollution analysts in Germany and Brussels suggest that a large cruise ship would probably burn at least 150 tonnes of fuel a day, and emit more sulphur than several million cars, more NO₂ gas than all the traffic passing through a medium-sized town and more particulate emissions than thousands of London buses.

<https://www.theguardian.com/environment/2016/may/21/the-worlds-largest-cruise-ship-and-its-supersized-pollution-problem>



Likewise the super yachts in Rozelle Bay generate diesel fumes with small particles. There are various other pollutants that are the result of vehicle emissions but probably the most concerning are the small particles, less than PM2.5, which are carcinogenic, cause respiratory problems, heart disease and other health problems. There are also significant health concerns about the even smaller micro particles.

Vehicle exhaust

The EIS argues that the contribution of car exhaust to total air pollution at the Sydney-metropolitan scale is minor at only 0.75%, with solid fuel burning the largest contributor at 50.6%. The EIS has omitted other non-exhaust particulates emitted by vehicles (5.5%), light duty diesel exhaust (2.2%), industrial vehicles and equipment (1.4%), which would bring total vehicle emissions to almost 10%.

Even if this was considered to be a low proportion of the total, the EIS concedes that PM2.5 vehicle emissions can have a health impact at any level, as can the cumulative impacts of all emissions. It could thus be argued that governments should be acting to reduce all types of emissions within all sectors, including transport. As is mentioned above, the long-term goal for transport emissions should be zero through high-occupancy public transport powered by renewables.

Filtration and real-time monitoring

Ventilation stacks must 1) be filtered and 2) located away from homes and schools. The proposed location of unfiltered stacks on Lilyfield Road opposite the frequently used Easton Park, and on Victoria Road in close proximity to Rozelle Public School is not acceptable. Conditions of approval must require appropriate air quality monitoring, including indoor monitoring, and should be implemented at schools and aged care facilities within the impacted community as well as rotating monitoring across residences throughout the construction period. Monitoring results should be made publicly available in real-time with mitigation measures implemented should validation show higher impacts than predicted.

Cumulative air quality assessment

The Department of Planning & Environment must, prior to any determination, conduct a further assessment of the project's contribution to cumulative air quality impacts. This includes consideration of emissions from the White Bay cruise ship terminal and emissions from Sydney Airport flight paths.



The Department must also, prior to any determination, conduct a further assessment of air quality impacts from ventilation facilities on nearby schools and assess ventilation facility height, local topographical effects and weather effects on emissions.

In-tunnel emissions

Despite assurances within the EIS that WestConnex will include a state-of-the-art tunnel longitudinal ventilation system, experience with tunnels such as the existing M5 have shown that it is inherently difficult to achieve clean air within any road tunnel. Cars offer some protection from poor air quality, but this is not the case for motorcycles, and there is likely to a proportion of tunnel users that are sensitive to pollutants at any level, e.g. asthmatics; noting that approximately one in nine Australians suffer from asthma.

Though the journey through WestConnex tunnels would for most drivers last for a relatively short period, there will be regular users of these tunnels that will be affected by pollutants over a long period. There will also be times when congestion slows traffic, increasing emissions and holding motorists within the tunnel for a longer period, increasing their exposure to pollutants. Further, the EIS does not include any information about alternative in-tunnel ventilation should the main system fail or if there is a fire or similar emergency situation in the tunnel. In contrast, most of these issues do not apply to rail tunnels as there are no in-tunnel emissions.

A further assessment of in-tunnel emissions, in-tunnel filtration options and emissions issues in failure or emergency situations must be conducted.

We also call on the Department to require that any conditions of approval measures to monitor and limit in-tunnel emissions are in line with the most stringent limits used internationally.

Impact of steep tunnel gradients in Rozelle

The tunnels that form part of the Rozelle Interchange include several at steep gradients. We know from the M5 that the resulting increased emissions from such angles are a concern.

The Department must require assessment of the air quality implications of emergency situations and the steep gradients proposed for the Rozelle Interchange.



Surface road emissions

We note IWC Consultant's Beca's key concern in relation to operational air quality impacts is that results of the EIS modelling indicate that the discharge of particulates and NO₂ may exceed criteria levels at impact receptors when surface roads are taken into account as well as the ventilation stacks. It is a major omission from the EIS that only pollutant stacks have been considered.

No mitigation or air quality monitoring has been proposed for the larger contribution from surface roads, particularly at the locations which are predicted to be significantly affected by additional traffic. On the basis of the EIS, these locations include Victoria Road from the Iron Cove Link tunnel portal at Rozelle through to Drummoyne; Anzac Bridge and Western Distributor; and Canal Road, Gardeners Road and adjoining major roads in the Mascot area.

Prior to any approval, an assessment of how flaws in the traffic modelling explained in Council's submission could influence air quality modelling results must be conducted. This assessment must consider emissions from WestConnex generated traffic on local and regional roads, not just State roads.

Design of ventilation stacks

In the EIS, the worst-case scenario has been depicted for the aesthetic finish of the proposed ventilation outlets in the Rozelle Rail Yards. **We expect that the actual finished product will not look like that of a nuclear power plant and instead any and all ventilation outlets for the M4-M5 link project will be in keeping with their surrounding environment and heritage.**

Any conditions of approval must include measures to minimise visual impacts of all Stage 3 ventilation facilities with a focus on the facilities in the Rozelle Rail Yards and on Victoria Road near Terry Street.

Mitigation of proposed Iron Cove Link

We note the proposed widening of Victoria Road near the Iron Cove Bridge to include tunnel entry and exit points for the Iron Cove Link. This includes a proposed construction site on Victoria Road, between Springside Street and the Iron Cove Bridge.

During construction, Clubb, Toelle and Callan Streets will be converted to cul-de-sacs while pedestrian and cycle access along Victoria Road will be diverted to Manning Street to connect with the westbound shared path on Victoria Road at the end of Byrnes Street.



Multiple residences will be in incredibly close proximity to this proposed construction.

Appropriate amelioration and respite measures must be introduced

Retention of Easton Park

We note the various commitments given by SMC representatives privately and publicly that Easton Park is safe and will not be utilised during construction in any way should Stage 3 proceed.

We ask that Easton Park not be utilised during construction in any way should Stage 3 proceed (or in connection to construction of the Second Harbour Tunnel should that proceed).

The EIS identifies Easton Park as one area where high to moderate visual impact is expected. **Planting and retention of mature trees to reduce sightlines must take place.**

Impact of increased traffic (further exacerbated by proposed Western Harbour Tunnel and Beaches Link)

This area is currently bordered by Victoria Road on the eastern side and by the Western Distributor and James Craig Road on the south side. It is thus already subject to some of the heaviest traffic flows in Sydney.

The resulting significant increases in traffic on Victoria Road, The Crescent, the eastern section of City West Link and Johnson Road should this proceed will seriously impact our community, and lead to increased and dangerous rat-running through what are currently quiet, suburban streets.

The EIS relies upon baseline investigations done for Stage 1 and Stage 2 – information which is now out of date, and probably irrelevant given the built environment around the Haberfield and St Peter’s interchanges has changed completely with the construction of the M4 East and new M5.

As the IWC is the government authority who:

- has the local knowledge of how current traffic management systems work in the Inner West are, and
- will be the one responsible at the end of the M4-M5 Link project to manage those systems, including any positive or negative impacts thereon,

we request that:



- **the RMS and other relevant agencies commit to actively working with IWC to identify and protect local streets that may be affected by WestConnex traffic, and**
- **that the RMS provide funding for the implementation of traffic calming works to protect these streets.**

To ignore the contribution that the IWC could make would be detrimental to the outcomes that the project is in fact trying to achieve.

Tunnels

We request that all tunnels be kept as deep as possible to reduce any noise, vibration and settlement impacts on residential and commercial properties and their occupants, both during construction and once in operation.

Prior to any determination, a further assessment of vibration impacts on people and buildings in locations where WestConnex tunnels are shallow must be conducted.

Remediation of the Rozelle Rail Yards

This site is one of the most toxic sites in Sydney and possibly in Australia. The legacy of its use as an abattoir and railway yard mean significant contamination exists. As the REF identifies, this contamination includes:

- Asbestos
- Acid Sulfate Soils
- Polycyclic Aromatic Hydrocarbons
- Lead
- Arsenic
- Total Petroleum Hydrocarbons
- Benzene
- Zinc

In addition to the very real risk of contamination of groundwater and waterways, given the history of the site, there is also a very real risk of extensive asbestos (as SMC has identified) as well as other air borne contaminants.

This is not a “normal” remediation. The Rozelle Rail Yards, given the legacy issues, and its proximity to homes, needs to be treated differently. Standard remediation measures are not sufficient.

- **The Rozelle Rail Yards recreation area needs to be delivered to Council at no cost, with all landscaping, paths and facilities constructed by the**



proponent in line with final designs which have been through comprehensive consultation.

Monitoring

As with all construction sites and processes, the proposed remediation works for the Rozelle Rail Yards will produce consequential dust impacts on the local community and in particular on local community residences and activities. This may be due to the type of work to be carried out on site or may well be exacerbated by weather conditions.

- **We request the appointment of an independent, appropriately-specialised monitor to ensure the engaged contractor complies with best practice. The monitor should have unfettered access to the site and contractor's vehicles and machinery to ensure compliance.**
- **We expect IWC officers to have access at all times to the site to independently ensure compliance.**

Dust

Our understanding is that during any construction works, dust is not allowed to leave the boundaries of the site. It would therefore be appropriate that a real-time dust monitoring system be required as part of the licencing requirements for the works. Such a system would include the appropriate trigger levels established at the boundaries of the site, alerts and daily reporting requirements by the contractor. At a minimum, daily reporting will be made both to the EPA and the IWC to independently ensure compliance.

In an attempt to minimise those dust impacts, we believe a set of procedures for the works are required to assist residents to minimise the impact of dust in their homes and lives. The development and further refinement of such a procedure will also have application during the proposed M4-M5 Link works and construction of the Iron Cove Link.

It is proposed that a set of procedures be developed in conjunction with SMC and the Inner West Council WestConnex Advisory Group on behalf of the local community.

The procedures will address at least the following concepts:

1. The implementation of a notification system whereby SMC is able to communicate in a timely manner with the local community and the Inner West Council utilising either mobile phone numbers or



appropriate alternatives, being those numbers that the relevant local resident has agreed to receive the notification via.

2. SMC must give prior notification to the local community where it is reasonable to expect:
 - a. the following day's construction activities on site; and/or
 - b. the weather conditions forecast may produce conditions where dust is likely to escape from the site, "the expected dust activity". The notification must be given by close of business of the day prior to the expected dust activity. Where a dust activity was not envisaged, then SMC must send that notification as soon as practicable after it has become aware that one is likely.
3. The notification must include:
 - a. the time when the expected dust activity is to occur;
 - b. the period of time it is expected to continue;
 - c. the direction SMC expects the dust to leave the site and travel in; and
 - d. such other relevant information to allow residents to reduce any negative impacts due to the expected dust activity.

Noise and Vibration Impacts from Construction.

Rozelle is the community which will be most impacted by noise during construction according to the EIS, with many residents highly affected.

We request that any licence granted by the Department of Planning not reflect the standards of those issued for the Westconnex Stage 1 and 2 works. Any license issued must:

- **be of a standard that significantly reduces noise and vibration impacts from that of Stages 1 and 2, and**
- **not allow the RMS to be able to undermine or circumvent compliance by the contractor with out of hours work directions**
- **ensure the provision of the highest grade acoustic sheds on entrance and exits as well as the spoil handling areas and any other amelioration measures which would lessen the impact on residents.**

Regular respite periods must be observed which are of sufficient length and which are not impacted by the operation of other utilities. We note the Government's and SMC's commitment to learn from the mistakes of Stages 1 and 2 – this is a critical area to demonstrate that.



Night Lighting Impacts during Construction

We request that any licence issued by the Department of Planning address the impact of night lighting during construction. Any residences which will be impacted from moderate to high level lighting must be provided with an appropriate solution to ensure they are impacted only at a low level.

Inadequate pedestrian access to the Rozelle Interchange Park and across Victoria Road and the City West Link.

We understand that the pedestrian and bicycle bridge which currently spans Victoria Road and the pedestrian and bicycle bridge over the City West Link to Glebe will be removed along with the traffic lights currently linking Victoria Road to the Western Distributor. These are heavily used by pedestrians accessing buses into the city, cyclists into the city and to Glebe and beyond.

There are currently 2 bus stops city-bound servicing these lower parts of Rozelle as well as 2 bus stops westbound on Victoria Road. The loss of these bus-stops will have a significant impact on our community.

The loss of pedestrian access to the Anzac Bridge pedestrian path will have a similar deleterious impact.

Greater pedestrian and cyclist access across Victoria Road, the City West Link and into the Rozelle Interchange Park is required. Existing bus stops should be retained to promote greater use of Public Transport and to ensure that residents and businesses in the lower part of Rozelle and Balmain have access to public transport.

Restriction of Public transport options for White Bay/Balmain light rail and Western Metro rail

The existing light rail corridor must be retained.

Use of Rozelle Rail Yards as the main construction site for the M4-M5 Link

Should Stage 3 proceed, we note your commitment to using the Rozelle Rail Yards as the main construction site. The defined construction activities including launching the tunneling machines, stockpiling and removal of extracted material, workforce car parking, offices and amenities as well as infrastructure required to support the construction of the tunnels such as sedimentation ponds.



All heavy construction traffic should be confined to the City West Link – residential streets are not an option.

Truck Marshalling Yard and Management of Construction Vehicles.

We welcome the establishment of a Heavy Vehicle Marshalling Yard at White Bay to ensure the traffic issues seen in the Stage 1 works at Haberfield are not repeated during the M4-M5 Link project. However, we believe that further work is required by the Inner West Council to ensure that any opportunities for “loopholes” in the surrounding residential streets are addressed and closed. **We request that SMC work in conjunction with the IWC to ensure a complete traffic management system is developed, managed and enforced. This may include the contribution by SMC of the necessary funding to provide enforcement resourcing for IWC.**

In regards to the egress or ingress of light vehicles between construction sites and residential roads, we request that the number of vehicles be staggered so no adverse impact is made to the traffic flow on local streets.

Minimising the impact of construction

The two-stage construction of Stage 3 must not increase or extend construction or operational impacts on our community. As per the EIS, Rozelle and Iron Cove works would commence in late 2018 but not be completed until the second half of 2023.

We note the intent to:

- Locate temporary buildings and structures so they provide a noise mitigation between the work sites and neighbouring areas
- Ensure temporary buildings and structures don't overshadow neighbouring properties
- Locate and design lighting to minimise light spilling from work sites
- Locate excavated material away from property boundaries
- Locate vehicle access points away from residences and minimise the need for trucks to be in residential areas.

We request that this be the default position given the many years of construction our community faces. Additionally, trucks should be prevented from idling in residential streets and that workers are required to park in a designated parking area. This area should be one which does not absorb existing, rare on-street residential parking.

Where residences are in close proximity to construction, additional mitigation measures should be implemented such as installation of triple glazed windows.



It is imperative that lessons learned result in appropriate design changes, stronger conditions of approval, improved management regimes and a more generous and considerate attitude toward affected residents for Stage 3. It is also important to note that mitigation measures should not bring benefits to some residents at the expense of others.

Impact on Haberfield

Stage 3 construction sites at or near the existing Stage 1 construction sites at Haberfield raise particular concerns as Haberfield residents have already endured significant impacts from the construction of Stage 1 without respite throughout 2016-2017. These residents will now experience an additional three or more years of impacts.

Haberfield residents have already been subject to considerable impacts from Stage 1, and extending the construction for a further three years raises serious health concerns. **It is thus imperative that if Stage 3 proceeds, DP&E, EPA and NSW Health must investigate all construction-related health issues and work collaboratively to ensure they are addressed in the EIS and that strong, comprehensive conditions of approval are drafted to minimise construction impacts across the project.**

Landscaping

In committing to the landscaping works envisaged in the Concept Design and EIS we believe that an appropriate body, such as the Sydney Harbour Foreshore Authority should have overarching responsibility for the funding of ongoing management and maintenance of the completed works at the Rozelle Rail Yards.

Day to day maintenance of the site should be the responsibility of IWC. The Rozelle Rail Yards recreation area must be delivered to Council for its ownership at no cost, and all landscaping, paths and facilities to be constructed by the NSW Government according to final designs. It is also expected that maintenance funding would be provided for an initial period and Council and the community will be closely involved in the development of a plan of management for this important site.

All residual lands should be delivered at zero cost to IWC unburdened by contamination or any immediate need for maintenance. All landscaping, paths and other community infrastructure should be delivered to Council fully constructed and all buildings (if any) renovated before handover.



Handover of residual lands should be in accordance with relevant conditions of approval that have been drafted in consultation with Council and affected communities. Further, the NSW Government should establish a fund that can be used by Council to maintain residual lands/facilities for an initial period.

We welcome the establishment of a Community Reference Group to work with SMC to determine the landscaping works for the Rozelle, Lilyfield and Annandale construction sites. As much as there are a variety of potential landscaping solutions for these sites, we believe that SMC should capitalise on opportunities to obtain and preserve mature plantings of trees at risk from other infrastructure works in the Greater Sydney area. Those plantings would need to be compatible with those in the current area, such as those around Easton Park. Where practicable, we would also expect that any existing mature trees on any construction site will be left in situ and maintained during the project.

In regards to the proposed Western Harbour Tunnel and Beaches Link (WHT) connections construction area, shown in Figure 13.21 of the EIS, should the works for the WHT not have been approved by the relevant authority 6 months prior to the completion of the M4-M5 Link works, then the landscaping work for that area denoted as area 2 in Figure 13.21 will be completed along with the landscaping work for the Rozelle Rail Yards.

Ensuring respite from construction including through the Coordination of Utilities so as to maximise “no work” periods for residents

We note the construction hours for surface work will be:

- Monday to Friday 7am to 6pm
- Saturday 8am to 1pm
- No work on Sundays or public holidays.

We note the additional caveat in the Concept Design that “while most of the surface construction work would be carried out during standard construction hours, some activities would need to be undertaken at night to effectively manage public and construction worker safety, design and quality considerations, and the duration of construction and any associated amenity impacts on the local community.

Given the many years of construction that our community will be subjected to, we request SMC and its subcontractors commit to working inside the standard construction hours with the “caveat” hours only being used in extreme circumstances rather than as a regular event.

Given the dreadful impact of round the clock construction on residents impacted by Stage 1 and Stage 2 construction as a result of work by SMC and other



Government utilities, we ask that the State Government deliver on its commitment to learn from the lessons of the past and ensure construction and construction-related work is coordinated so that residents have the chance to sleep.

We request the establishment of a Construction Complaint hotline, operating 24 hours a day, 7 days a week with appropriate compliance and response funding so that breaches and concerns can be reported and acted on immediately.

Co-ordination of project-related utilities work

Experience with Stages 1 and 2 has shown that cumulative construction and utilities works have been a major issue for residents. These have arisen primarily from a vast range of utility relocation works necessitated by WestConnex being undertaken at the same time as project works, or during periods when residents might otherwise enjoy respite. Whilst project works are 'contestable' in that they must comply with the project's conditions of approval, the utilities works are 'non-contestable' as they are formally not part of the project.

A utilities manager should be employed, adequately resourced and provided with enforcement powers, to co-ordinate project and utilities works so that cumulative construction impacts on residents around worksites are minimised.

Prior to any determination, DP&E and EPA must improve, strengthen and simplify procedures between the two agencies applying to monitoring and complaints about core (contestable) project works and associated (non-contestable) utilities works. Information on improved complaints procedures to be disseminated by DP&E, EPA and the project's utilities manager.

More resources also need to be allocated to compliance monitoring. This includes independent regulators which have the capacity and authority to intervene, supervise and prosecute when necessary.

Conditions of Approval must reflect those of Sydney Metro (rail) project

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 night-work curfew.

Cumulative noise impact assessment

A further cumulative impact issue has been overlapping of noise envelopes from project works from several construction areas – a particular issue for some Haberfield residents located between several of the project work sites. It would appear the conditions of approval have considered the impacts of each work site in isolation without considering how noise, vibration and other impacts might add together to become intolerable. For Stage 3, this is an important issue for the Rozelle/Lilyfield/Annandale construction sites due to the number of construction sites and construction activities underway simultaneously within one area.

An assessment must be undertaken of Stage 1 and 2 cumulative noise impacts from overlapping noise envelopes, to guide relevant construction management plans for Stage 3.

Management of Excavated Material

We note the intent to reuse or recycle at least 95% of uncontaminated excavated material.

Excavated material that cannot be used on site and which is required to be taken by haulage to offsite facilities should be removed via White Bay and non-residential roads.

The creation of up to 10 hectares of new public open space in the Rozelle Rail Yards

We note the commitment to locate the new Rozelle Interchange almost completely underground and up to 65 metres below the surface.

We note your stated key principles of:

- Improving connections between Rozelle/Lilyfield and Annandale, to open space and to the Harbor
- Creating opportunities for new open space or community facilities
- Achieving better environmental outcomes, particularly in terms of water management

The open space link between Bicentennial Park and Easton Park must be maximized given the important nature of this green lung for our community.



Appropriate budget must be provided for the greening and maintenance of this site by State Government.

This site should include appropriate walkways and cycleways, sporting fields, a skate park, and community gardens.

Appropriate security measures should also be implemented to optimise security of park users, including children.

Groundwater and Settlement Relevant Criteria

We note that the potential impacts from groundwater withdrawal induced settlement on properties has not been modelled in the EIS. In determining the predicted settlement criteria for a property we request that these potential impacts must be taken into account in the modelling to ensure that the relevant criteria for settlement is not exceed.

We also request that SMC be made responsible for the development and implementation of a construction settlement monitoring program.

Settlement Relevant Criteria.

In Table 12.4 of the EIS, the relevant settlement criteria is set out for low/non-sensitive properties and high/sensitive properties. Our understanding is that should a property sustain damage due to settlement within the relevant criteria, all damage due to that settlement will be remedied. Our concern is the extent of settlement that is being allowed to occur.

Having spoken with building specialists, no building with settlement of 30mm will be able to be refurbished to its pre-existing condition. This is also the case for sensitive properties where a 20mm settlement criteria is being proposed.

We request that the settlement relevant criteria be reduced to 15mm in the case of low/non-sensitive properties and 10mm for high/sensitive properties. This will ensure that the contractor will apply the appropriate level of pre-planning and proactive management to minimise settlement damage to properties.

Detailed process for repair of damage to homes

Given the fragmented construction process for Stage 2, and the potential for multiple parties to be responsible for damage to homes (and for disputes as to which



body is responsible), a formal remediation process must be in place to streamline the process for residents and ensure damage is fixed within a reasonable time frame

Darley Road Construction Site

The EIS lacks detail about what is proposed for the Darley Road Construction Site or how the severe impacts of the proposal would be mitigated if it were to go ahead. On this basis, it should be rejected on the grounds that it exposes the community to unacceptable danger.

Darley Road is incapable of accommodating the proposed traffic movements without jeopardizing the current road network. Darley Road is a critical access road for our community to access and cross the City West Link and is heavily congested at peak hours. The addition of hundreds of trucks and contractor vehicles will result in traffic chaos at a critical junction of the Inner-West's and Sydney's traffic network. The proposed movement of 170 heavy and light vehicles a day endangers the safety and lives of pedestrians accessing the North Leichhardt light rail stop; cyclists accessing the Darley Road bicycle route and the many school children who cross here to walk to Orange Grove Public School and Leichhardt Secondary College.

7 Darley Street Leichhardt must be rejected as a Stage 3 construction site as it raises many issues, including traffic safety, noise and dust impacts. A detailed road safety audit is required which must include examination of traffic volumes and crashes, and an audit of traffic safety risks.

Signage

The erection of large standard directional signs and variable message signs in compliance with RMS standards is completely unsuitable for residential locations.

Any conditions of approval must include measures to minimise visual impacts of roadside directional signs and variable message signs associated with the project.

The Acquisition process

The compulsory acquisition of homes and businesses throughout this process has been atrocious. The EIS states that the number of properties to be acquired during Stage 3 comprises 26 residential properties together with 24 commercial or industrial zoned properties and one mixed use property, containing 48 businesses.

Numerous difficulties experienced by residents who were served with property acquisition notices have exposed cumulative negative experiences ranging from



under-valuation of homes to dislocation of community life. Many households reported that they were severely disadvantaged by the acquisition process and, as a result, moved away from their local communities and support networks. This exodus also represented a major loss to the communities concerned.

The compulsory and voluntary acquisition processes of properties needs significant improvement.

CONCLUSION

We appreciate the opportunity to make a submission. We strongly oppose this project, especially given the alternatives that exist, including public transport, and the alternative design proposed by Inner West Council.

We are concerned that the “consultation” process is a shame given the design provided in the EIS is not final, given the constricted EIS display timeframe, and given the extremely short period of time between receipt of comments on the concept design and the release of the EIS. We demand the opportunity to be consulted on the final process given the devastating impact this will have on our community.

We are deeply concerned that the WestConnex project fails to deliver the Government’s stated outcomes and fear for our community, given the dreadful precedents set in Stages 1 and 2 from the heartless compulsory acquisition process, the failure to provide genuine respite for residents, the lack of empathy for residents in the path of this massive project, and the paucity of modeling on which the EIS is based.

Should you have any questions or wish to contact us, we are available on WestProtectsRozelle@yahoo.com