

# BEVERLY HILLS NORTH PROGRESS ASSOCIATION

8 Elouera St South,  
Beverly Hills. NSW. 2209.  
16 November 2014.

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

**Project Name: M5 King Georges Road Interchange Upgrade**

**Project Number: SSI 14\_6547**

## Application to Object to the Proposal

### Grounds for Objection and further considerations to be included in the Proposed Project:

There are two major reasons for the objections to this proposal:

1. No detailed analysis of traffic logistics for King Georges Road and the surrounding support road network has been provided in the EIS. The BHNPA residential community requires a significant study, with details of measures to alleviate the impact of the substantial increase in the amount of local traffic due to the M5 upgrade, will have on the local road network.
2. A proudly publicized and accurately measured increase in both the amount and speed of traffic flow on the M5 and onto and off King Georges Road, has “no adjustment proposed” or “no lower than existing barrier”, as consideration for the impact of the substantial increase in noise on the residential community. A selective offering of double glazing to a few highly-affected residents, who will need to keep their windows and doors permanently closed, does not represent fair and reasonable compensation for the nearby community that is asked to agree to a substantial increase in road and traffic noise very close to their residence. The BHNPA community requires an “upgrade” in the noise attenuation measures to match the double “upgrade” in traffic flow.

Further references to the **Environmental Impact Statement Volume 1** (released to the community by WestConnex in mid-October 2014), follows:

EIS Section Reference	Objection / Proposed Amendment
3.2.1 (p12)	“The Transport Master Plan recognizes the upgrade of the M5 corridor to increase the motorway capacity to accommodate commercial vehicles and freight demand. The project would help to deliver these benefits by improving the performance of the M5 Motorway and King Georges Road.” There are no proposals in the EIS to suggest there are any changes to the performance of King Georges Road, other than delivering more traffic. With the 3 lanes being reduced to 2 lanes by parking zones at both Beverly Hills and Wiley Park shopping area, the proposal appears to move the congestion from the M5, onto King Georges Road, that is, localizing the traffic congestion.
3.3.2 (p17)	Forecast Traffic Volumes. Project proposal will “improve the operation of the M5/KGR intersection.”

	<p>Publicized forecast of “reduce travel time at the intersection from as much as 6½ minutes to 3½ minutes, a 49% travel time saving, AT THE INTERSECTION.” This is moving the same congestion onto King Georges Road and local residential roads. Without any changes to the operation of King Georges Road, this flow-on effect will produce greater local traffic congestion. This issue has not been addressed.</p>
4.2.3 (p24)	<p>The proposed project “reduces congestion on King Georges Road and the M5 near the interchange.” Improving the traffic flow through the intersection simply moves the “bottleneck” to the next obstacle, be that the 5 sets of traffic lights on King Georges Road towards Beverly Hills, or the 8 sets of traffic lights towards Wiley Park, or the parking zones in both shopping areas. This will create a substantial increase in “rat runners” on residential streets and impacts on the safety of residents using their local roads. The BHNPA community calls for a review of traffic volumes and vehicle speed on the residential street network, with speed and traffic mediation measures significantly increased and improved, to address this issue.</p>
5.3.5 (p41) & Fig 5.2 (p37)	<p>The diagram of the planned noise walls, east of Coolangatta Rd, opposite Elouera St South, indicates the noise wall has a ‘kink’ in it, and is moved closer to residents’ homes, than the existing noise wall.</p> <p>This is an apparent a cost-saving measure, as it allows the construction of the retaining wall for the westbound off-ramp to be lower and shorter, and uses the existing native planting area to achieve this. There is no apparent reason to move the noise wall closer to residents. All measures must be taken to preserve the native planting area close to residents’ homes and retain the current location of all noise walls.</p>
Fig 5-4 (p40)	<p>Coolangatta Road underpass - Details of measurements are required. Diagrams do not indicate the actual widths and heights of the underpass. Diagram also indicates a partial perspex structure on the bridge as a partial noise restriction measure. Given the proposed doubling of lanes on the M5 and doubling of traffic volumes and the increase in traffic speed, a partial noise barrier is inappropriate and will be ineffective in reducing traffic noise. The resident community requires a complete perspex noise barrier on both sides of the bridge to the same height as the noise walls on the sides of the motorway.</p>
5.3.5 (p41)	<p>There is no commitment from WestConnex to retain the existing noise wall and noise mound on the south side of the motorway between Kooemba Road and Coolangatta Road, stating it “may be replaced with a noise wall or a combined noise mound/noise wall,” and in Table 5-2 stating the combination will be “no lower than the existing barrier.</p> <p>As the traffic flow is substantially ‘greater than existing’ and the noise being produced will be substantially ‘greater than existing’, the noise barriers must also be ‘greater than existing’. As can be seen from Fig 5-4 the natural slope of the land is towards the south, yet the higher noise walls are on the north, i.e. 5 metres. Sound is easily refracted at small angles, as it passes over smaller barriers, retaining the greater part of its intensity or loudness. The Beverly Hills North residential community requires a 5 metre high noise wall to be constructed on top of the existing 1.5 metre noise mound as a minimum consideration of the impact that the increase in traffic noise will have on the residents, and the depreciation in home values, as a result of the M5 upgrade.</p>
6.3.8 (p59)	<p>“Noise barriers would be constructed either via adjustment of existing noise walls or they would be removed and rebuilt.”</p> <p>There is no commitment from WestConnex to increase noise attenuation measures, despite significant increases in traffic volumes.</p>

Fig 6.3 (p68)	Construction Compound Sites – Kirrang Street. Figure indicates potential access and delivery route along Elouera St (South), despite there being no access to Kirrang St from Elouera St(South). If this interpretation is correct, and Elouera St(South) is to be used for road haulage and heavy vehicle deliveries during the proposed 6 months of construction, not a single resident in Elouera St (south) has been contacted or consulted or received any notification of this impact.
7.4.1 Table 7-1 (p77)	<p>Overview of Key Consultation Activities. The resident door-knocking activities on Thursday 14 October, consulted 24 residents near the construction compounds. Given WestConnex commitment to “increase community awareness and opportunities for participation, ensure community issues are addressed, and ensure appropriate consultation tools are used (Consultation Objectives, p73)”, only 24 residents were informed of the dramatic impact that the construction proposal would have on their lives for 6 months. The other 68 residents received a “Sorry we missed you, Please contact us” notice. No detailed information of the proposal was included and responsibility being passed over to the resident to contact WestConnex.</p> <p>The Beverly Hills North community requires a greater degree of real information and authentic consultation with the affected residents adjacent to the M5 and the construction sites. Full disclosure of genuine and honest plans for the M5 upgrade, and the effects on the residential community, is required.</p>
7.4.1 (p78)	WestConnex consultation with local schools, presumably provided WestConnex with information in regards to Regina Coeli students using Coolangatta Rd and the M5 cycle pathway (south) between Coolangatta Rd and Kirrang St, to access sporting fields every Tuesday afternoon. They also cross Coolangatta Rd near the M5 bridge. This will require further short-term consideration in the construction process and long-term consideration in providing a pedestrian crossing on the south side of the Coolangatta Rd bridge, as many cyclists, pedestrians and motorists are confused by the current speed hump arrangements. This confusion is unnecessary, and has lead to several near catastrophes, which could involve serious injuries.
8.1.4 (p91)	<p>Performance of existing road network. “The M5 motorway westbound off-ramp carries approximately double the traffic of the westbound entry ramp for the majority of the 24 hour period.(p90)” This recognizes that there is more traffic being fed into the existing road network around Beverly Hills. “This section of King Georges Road is a school zone with a speed limit of 40 kph for the last hour of the AM peak.(p91)”</p> <p>This is stated and recognized as a significant problem in the EIS, but there is no suggestion, no alteration, no plan to alleviate the problem. Just recognize it, add to it, and seek community approval to do it. This community calls for a long-term plan of widespread traffic measures to address the present and future traffic congestion problems in the M5-King Georges Road precinct, prior to the commencement of any construction work on the Interchange Upgrade. With 14 sets of traffic lights and 3 restricted speed school zones along King Georges Road in the vicinity of the M5, the prospects for the creation of a King Georges Rd carpark is a reality.</p>
9.1.3 (p134)	<p>Assessment of potential impacts.</p> <p>Assurance is required from WestConnex to actively minimize the effects of their construction activities on the native flora and fauna on either side of the M5. The establishment and maintenance of these native planting areas are a direct result of residents working together with local councils to minimize the visual and aural effects of the proximity of the M5 motorway. WestConnex must guarantee all care and consideration to preserve these areas. Replace of any damaged or removed fauna with similar species of similar maturity must be assured. These guarantees</p>

	or assurances have not been given in the Environmental Impact Statement.
9.2.1 (p139)	<p>Community and Stakeholders Consultation.</p> <p>Under this heading a “program of meetings and briefings was held with key state and local government agencies” and “will continue to consult with a range of special interest groups and with relevant industry stakeholders” and “emails (sent) to registered stakeholders”, but nothing is stated about any consultation processes or future plans to keep the residential community informed. The Beverly Hills North residential community asks for a more genuine process of information dissemination and authentic consultation to occur in all future proposed developments.</p>

Further references to the Environmental Impact Statement Volume 2, containing

**Appendix C : Concept Design Drawings**

(released to the community by WestConnex in mid-October 2014), follows:

EIS Section Reference	Objection / Proposed Amendment
Road Alignment Cross Section Sheet 3	<p>Clear indication of the intention to remove noise mound from M5(south) east of Coolangatta Rd bridge, and replace with a noise wall, despite EIS document [section 5.3.5, p41]stating it “MAY be replaced with a noise wall or a combined noise mound/noise wall.” The positioning of the noise wall is at the southern most point, closest to residents’ homes, while providing a gentle slope 1:3 on the northern(M5) side of the noise wall.</p> <p>This significantly reduces the area available to regeneration of native flora on the residents’ side of the noise wall, while allowing the greatest convenience to the M5 construction and REDUCING the noise protection offered to residents on the south side of the M5.</p> <p>Further to this, using this diagram as a guide, sound travelling from the centre of the M5 has to undergo a 7° refraction over the south noise wall and a 20° refraction on the north noise wall, to be perpendicular to ground level. Little wonder the residents of NCA08 (south east of Coolangatta Rd) incur the greatest impact from M5 traffic noise.</p> <p>Residents south-east of Coolangatta Rd bridge require the positioning and height of the noise mitigation measures to be reviewed and amended to provide more effective reduction in traffic noise as a direct result of the M5-KGR Interchange Upgrade proposal.</p>
Road Alignment Plan - Sheet 6	<p>All existing noise mounds on south side of M5, east of Coolangatta Rd bridge to be demolished and replaced by a noise wall of undefined height, closest to the current cycle pathway. Noise mound and wall at the eastern end of Coolangatta Rd (south) is demolished and replaced by a noise wall adjacent to the existing cycle pathway. Partial replacement of a much smaller noise mound commences at the eastern end of Kirrang St.</p> <p>This allows little to no area for replacement plants and trees close to the noise wall, to soften its visual impact for residents and the community using the pathway. Photos provided in EIS Volume 1 Section 9.3.5, Fig 9-8 comparing existing and indicative impressions at Observer Location 2(Kirrang St), are incorrect and misleading. They indicate a full retention of the existing noise mound with the addition of a substantial noise wall on top. This impression is not representative of the Plan Sheet 6 in Appendix C. This needs to be reviewed in the context of the visual impact on residents and the community.</p>

Further references to the Environmental Impact Statement Volume 2, containing  
**Appendix F : Noise and Vibration Impact Statement**  
(released to the community by WestConnex in mid-October 2014), follows:

EIS Section Reference	Objection / Proposed Amendment
Executive Summary (p4)	<p>"Noise impacts are due to the change in road alignment, which moves the traffic closer to receivers (residents) and/or reduces the screening benefit from existing ground topography (noise mounds) and noise walls"</p> <p>"The predicted 'Build (M5-KGR Upgrade) scenario' noise levels at receivers adjacent to the motorway are typically above the RNP noise goals at the majority of the adjacent receivers."</p> <p>"An increase in the number of maximum noise events is predicted in line with the increase in traffic volume."</p> <p>"The majority of the eligible receivers (21 of the total 24 receivers) in the 2017 scenario are located in NCA08 (south of the motorway, east of Coolangatta Rd). A noise barrier adjacent to these receivers has been considered in order to provide additional noise mitigation. The optimized height of this barrier was determined to be 3 metres, and was found to provide a REASONABLE noise benefit."</p> <p>As identified from the Plan diagrams in Appendix C, these direct quotes from the Executive Summary on Noise Impact Assessment, indicate the residents adjacent to the M5, south – east of Coolangatta Rd bridge will have a noise management issue, which needs to be reviewed and addressed. The long-term detrimental effects of an increase in noise levels that WestConnex is clearly aware of are not to be sacrificed as economic cost-reduction measure. Again, the BHNPA resident community calls for a review of the proposed noise mitigation plans to better accommodate the needs of the community. Retention of the current noise mounds and a full 5 metre noise wall no closer to residents' homes is required.</p>
7.1 (p38) Table 13	<p>Baseline operational noise predictions – 'acute' receivers (i.e. resident's homes receiving road noise above 65dBA for 15 hours of the day or receiving road noise above 60dBA for 9 hours of the night):</p> <p>Most Affected Region = NCA08 (south east of Coolangatta Rd bridge)</p> <p>2 receivers during the day and 5 receivers at night.</p>
7.2 (p40)	<p>Number of receivers considered for additional noise mitigation (as per ENNM):</p> <p>As previously stated in Executive Summary, 21 out of 24 residents in NCA08. For the majority of these residents the proposal of 'additional noise mitigation', meaning adjustments to windows and doors of their actual residents in not an acceptable compensation for the increase in noise levels being created by the M5-KGR upgrade. The noise mitigation must be deployed further away from the residents homes and properties and be incorporated into the whole construction plan, i.e. a more effective noise mitigation system, as identified above.</p>
11.7.2 (p52)	<p>Change in Maximum Noise Levels</p> <p>"No significant increase in the magnitude of maximum noise events is predicted on the basis that all design barriers across the project area are either to remain at the existing height, to be increased in height or for new noise barrier to be installed."</p> <p>The statement that there will be 'no increase in maximum noise events' is based on the presumption that the current situation is acceptable. Given that WestConnex public liaison spokesperson described the original M5 construction of noise mitigation measures as 'a dog's breakfast', then no increase is no better! The BHNPA community requests a better plan to avoid another 'dog's breakfast' being served up to the community as adequate compensation for the detrimental effects for having a major transport thoroughfare as an uninvited neighbour.</p>

Further references to the Environmental Impact Statement Volume 2, containing **Appendix E : Traffic and Transport Assessment** (released to the community by WestConnex in mid-October 2014), follows:

EIS Section Reference	Objection / Proposed Amendment			
Table 4-2 (p71) Table 7-6 (p109)	Average Travel Time Survey Results for King Georges Rd (shown in minutes):			
	Route		2014	2017 with Project
	Northbound from Stoney Creek Rd to Canterbury Rd	AM	9:09	10:44
		PM	8:04	9:25
	Southbound from Canterbury Rd to Stoney Creek Rd	AM	9:46	14:39
		PM	9:26	10:55
	<p>These comparative figures indicate an increase in travel times across all 4 travel scenarios, which directly contradicts WestConnex Public Liaison Spokesperson claiming that 'congestion on King Georges Rd will be improved by the Interchange Upgrade.' This statement was based upon the increase in the capacity of the M5 eastern 'on ramp' to hold more traffic and therefore reduce the number of vehicles congested on King Georges Rd.</p> <p>The BHNPA calls on WestConnex in conjunction with the Department of Roads and Maritime Services and the local councils of Canterbury and Hurstville to address this issue. There is clear data presented in the EIS document that the Interchange Upgrade proposal would have an effect on local traffic conditions. Denying or ignoring the effects of a substantial increase in traffic on a suburban road has far-reaching implications that require a coordinated response at all levels of public responsibility. The combination of increased traffic volumes with 14 sets of traffic lights, restricted speed limit school zones and reduced traffic lanes due to parking allowances requires detailed assessment and a plan of action.</p>			

Throughout this submission, the BHNPA has detailed some suggestions and considerations that are worthy of attention, so as to preserve the living conditions of the residential community in co-existence with the future demands of a growing 21<sup>st</sup> Century urban environment.

My apologies for not including further residents' signatures to this submission, as the due date restricted the amount time to prepare this document and gain further community consultation. At the time of submission, 12 residents from 6 properties immediately adjacent to the M5, in the NCA08(south of M5, east of Coolangatta Rd bridge) residential area have viewed and approved of this submission, some of whom have also prepared and submitted other objections for consideration.

This submission has been further shared with other local residents through a local resident letter drop and Internet access, using a Google doc sharing format ([goo.gl/DPbwVG](https://goo.gl/DPbwVG)), with the emailing of their suggestions and comments back to the BHNPA email address.

Thank you for this opportunity to express our objections to the current proposal for the upgrade of the M5 King Georges Rd Interchange, and we look forward to be informed and consulted in future plans that include the interests of the Beverly Hills North Progress Association Residential Community.

Yours sincerely,

John English  
BHNPA Chairperson  
Email: [johnbenglish@hotmail.com](mailto:johnbenglish@hotmail.com)  
Ph: 0410693502

Referenced links:

[WestConnex EIS](#)

[WestConnex EIS Appendix C: Concept Design Drawings](#)

[WestConnex EIS Appendix F: Noise and Vibration Impact Assessment Part 1](#)

[WestConnex EIS Appendix E: Traffic and Transport Assessment Part 1](#)

[WestConnex EIS Appendix E: Traffic and Transport Assessment Part 2](#)