

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

Proposed Modifications to the M4-M5 Link (Rozelle Interchange)
Application Number: SSI 7485

We reside at [REDACTED] Annandale, NSW, 2038 and strongly object to the proposed modifications to the M4-M5 Link (Rozelle Interchange), in particular we object to the proposed elevated vehicle overpass ("Crescent Overpass"), upgrades to the intersection of The Crescent / Johnston Street / Chapman Road and the realignment of the Pedestrian and Cycling Green Link and new share user path bridge. We have outlined the basis for our objection below.

1.0 The Crescent Overpass

The proposed Crescent Overpass is undesirable from both a visual and noise perspective. Furthermore, it is completely unnecessary in the context of the WestConnex Project. It is unacceptable that the Crescent Overpass is being proposed now given it was specifically noted in the WestConnex M4-M5 Link Community Feedback Report dated 12 May 2017 – 4 August 2017 at page 10 that ***"most of the Rozelle Interchange will be built underground"***. In our view, it is disingenuous for an overpass to be proposed as a modification given it is such a fundamental change to the original approved plan.

1.1 Visual Impact

It is noted at Section 4.4.1 (page 4-12) of the WestConnex M4-M5 Link Rozelle Interchange Modification Report ("the Modification Report"), dated August 2019 that the Crescent Overpass would.... ***"Reach an elevation of approximately eight metres above the intersection of City West Link and The Crescent.."***. It is not entirely clear from the information contained in the Modification Report what component of the proposed structure was being referenced with respect to the eight metre height. However, through questioning at the "community information session" held on Wednesday 28 August 2019, it was noted that the reference to 8 metres was to the **underside** of the proposed Crescent Overpass (rather than the actual completed height of the structure). Clearly the relevant height for those impacted by the proposed structure is not the clearance from the street but the actual height of the completed structure. This would likely add an additional 2 – 4 metres to the height from the stated 8 metres in the Modification Report. Furthermore, consideration needs to be given to the lighting and the street signage that would also be included on the proposed structure and add to the adverse visual impact.

It is important to note (as a reference) that the clearance height of the Annandale (Johnston Street) Underbridge is only 4.3 metres. Please refer to Plate 6-10 on page 6-69 of the Modification Report which provides a photo of the Annandale (Johnston Street) Underbridge which is located only 200 metres from the Rozelle Bay Light Rail Stop (where the proposed Crescent Overpass would be most prominent). For your reference, we have included Plate 6-10 as Appendix 1. The clearance of the proposed Crescent Overpass is almost double the height of the Annandale (Johnston Street) Underbridge. There is no doubt that the height of the proposed Crescent Overpass is offensive and will have a significant negative impact from a visual perspective for the residents of Annandale, particularly those residing at Bayview Crescent, Pritchard Street, Annandale Street, Railway Parade, Kentville Avenue and Johnston Street.

We have significant concerns with the various illustrations that have been included in the Modification Report which are intended to provide an indicative view of the Crescent Overpass. In this regard, we refer to Figure 4-4 on page 4-13 of the Modification Report (which we have attached for your reference as Appendix 2). In this illustration, it would appear that the height of the Crescent Overpass at the intersection of the City West Link and The Crescent is broadly consistent with the base of the light rail carriage. This is clearly inconsistent with Plate 6-5 and Plate 6-6 (on pages 6-62 and 6-63 of the Modification Report (which have been included for your reference at Appendix 3 and Appendix 4). It is obvious from Plate 6-5 and Plate 6-6 of the Modification Report that the proposed Crescent Overpass will be significantly higher than what is illustrated at Figure 4-4 of the Modification Report. Whilst we acknowledge that the inconsistency with respect to the illustrations included in the Modification Report may have been inadvertent it is nevertheless very concerning and raises concerns with respect to the credibility of the Modification Report.

Furthermore, it is telling that the Modification Report does not include a Photomontage which provides an indicative view of the impact of the proposed Crescent Overpass on the residents of 300 Johnston Street, Bayview Crescent, Pritchard Street or Railway Parade. An indicative view taken from the eastern side of the City West Link and The Crescent intersection (towards the proposed Crescent Overpass) would demonstrate the significant adverse impact for the residents 300 Johnston Street, Bayview Crescent Pritchard Street and Railway Parade (as the relevant residences would be behind the structure from this view). For some reason NSW Roads and Maritime Services ("RMS") have decided not to include such a view in the Modification Report.

We note that the Modification Report includes at Plate 6-4 (on page 6-61) an indicative view north-west from the corner of The Crescent and Johnston Street (with and without the proposed Crescent Overpass). We have attached a copy of Plate 6-4 as Appendix 5 for your reference. However, the Modification Report does not include the reverse view (that is, an indicative view south-east from the intersection of City West Link and The Crescent). Again, such an oversight by RMS may have been inadvertent, but the omission raises concerns with respect to the credibility and transparency of the Modification Report.

At Table 6-25 (page 6-48) of the Modification Report it is noted that the sensitivity of the view for the residents of Bayview Crescent and 300 Johnston Street is classified as **"High"**. As such, it is extremely disappointing that the illustrations included in the Modification Report do not adequately address the impact of the proposed Crescent Overpass for the residents of Bayview Crescent and 300 Johnston Street. Given the other indicative views included in the Modification Report, it would appear that RMS have made a conscious decision not to provide a complete analysis to the community. We believe it reasonable to conclude that such a decision by RMS was on the basis such analysis would not be favourable to RMS as it would clearly illustrate the negative impact of the proposed Crescent Overpass.

1.2 Noise Levels

The Modification Report includes Appendix C which provides a noise and vibration assessment. It has been concluded in Section 7 (at page 94) of Appendix C of the Modification Report that.... ***"Operational road traffic noise levels are expected to generally be comparable to the approve project"***. We dispute this assertion and note that RMS acknowledge in Section 7 (at page 95) of Appendix C that noise is predicted to increase near Bayview Crescent as a result of the proposed Crescent Overpass.

It would appear from the analysis in Appendix C of the Modification Report that RMS are asserting that the proposed Crescent Overpass will not control noise levels as these would be controlled by

the traffic that would otherwise be on The Crescent and City West Link. In Section 6.3.2 (at page 88) of Appendix C of the Modification Report, RMS assert that ***"noise levels from the overpass alone are around 4 dB below the noise levels from the other surrounding roads"***. In our view, this assertion appears to conveniently ignore what we believe should be the threshold issue. That being, whether the proposed Crescent Overpass will increase the noise levels when compared against the original approved plan. The simple conclusion as confirmed RMS in Section 7 (at page 95) of Appendix C of the Modification report is that the proposed Crescent Overpass ***"is predicted to increase noise levels"***.

RMS have estimated that the Crescent Overpass would have 16,000 vehicles during the forecast 2033 daytime (refer page 88 of Appendix C of the Modification Report). In our view, the noise generated by 16,000 cars each day will be significantly greater with those cars travelling 8 - 12 metres above the roadway on the proposed Crescent Overpass when compared to the original approved plan when those vehicles were intended to travel at the existing roadway of The Crescent. There can be no doubt that the adverse noise impact to residents of 300 Johnston Street, Bayview Crescent, Pritchard Street and Railway Parade in Annandale will be significant.

2.0 Traffic Network Performance

It is noted at Section 2.1.2 (page 2-1) of the Modification Report that ***"a new elevated overpass (The Crescent overpass) was considered the most appropriate option for alleviating future traffic pressures at the intersection of The Crescent and City West Link."***

However, the data provided at pages 6-9 to 6-14 of the Modification Report does not support this conclusion with respect to improved network performance. In fact, it is specifically noted at page 6-17 of the Modification report that during the AM peak hour, ***"the proposed modification is likely to result in similar travel times compared to the EIS scenario."*** It is further noted at page 6-17 of the Modification Report during the PM Peak hour that ***"the results for the proposed modification are similar to those in the EIS, with the difference considered to be minimal and non-significant."***

On the basis of the analysis undertaken by RMS, the construction of the proposed Crescent Overpass has a minimal and non-significant impact on the performance of the traffic network. It is clear from the analysis included in the Modification Report (which has been prepared for RMS) that the Crescent Overpass is irrelevant and unnecessary in the context of future traffic performance. Furthermore, it is concerning that RMS could conclude at page 2.1 of the Modification Report that The Crescent Overpass was the most appropriate option for alleviating future traffic pressures given the actual data included in the Modification Report. Such a conclusion is clearly inconsistent with RMS's own data.

3.0 Shared User Path and Green Link

It is asserted by RMS in the Executive Summary of the Modification Report (at page xiii) that ... ***"The proposed shared user path bridge and green link would maintain pedestrian and cyclist connectivity between Rozelle / Lilyfield and Annandale and key open spaces by comparison to the EIS and would be a significant improvement by comparison to existing conditions."***

In our view, such an assertion is blatantly false. If you refer to Figure 4-2 of the Modification Report (page 4-8) it is clearly evident that access from the Green Link to the eastern side of The Crescent and Bicentennial Park is far more complex than the approved project design. Based on the key provided on Figure 4-2 of the Modification Report, the distance from the Green Link to the eastern side of The Crescent is approximately 225 metres pursuant to the Approve project design. This

compares to approximately 500 metres from the same points pursuant to the Modification design. That is, the distance is more than double the original Approved project design. We have attached Figure 4-2 from the Modification Report as Appendix 6 for your reference.

With respect to the access from the Green Link to Rozelle Bay Light Rail, we acknowledge that the Modification design would result in a slightly reduced distance when compared to the Approved project plan. However, it is important to note that if you were seeking to access Rozelle Bay Light Rail from the eastern side of The Crescent (for example for those individuals working at premises located on James Craig Road), the Approved project design clearly provides the most efficient access.

In our view, any reference to “existing conditions” is irrelevant to the specific issue to be addressed. The comparison should not be to the existing conditions but rather to the original Approved design pursuant to the EIS.

4.0 Public Transport

It is asserted by RMS in the Executive Summary of the Modification Report (at page xiii) that ...***“In relation to public transport, the bus bay on the west side of The Crescent would be relocated slightly further to the south to just north of the Johnston Street intersection. The realignment of the green link to the west would provide an improved connection to the Rozelle Bay light rail stop.”***

In our view, such an assertion is blatantly false. If you refer to Figure 4-2 of the Modification Report (page 4-8) you will note that pedestrian access from the western side of The Crescent was included in the Approved project design. Access to the Rozelle Bay light rail stop remains the same for people seeking to access the light rail stop from the bus stop mentioned. Access to the Rozelle Bay light rail stop is similar for those people seeking to access from the green link pursuant to the Modification design as compared to the Approved project design. For those people seeking to access Rozelle Bay light rail stop from the eastern side of Crescent, they will be significantly worse off under the Modification design versus the Approved project design.

5.0 Western Harbour Tunnel

The Modification Report references the intent of RMS to reduce construction fatigue that would result from the proposed Western Harbour Tunnel project. It is important to note that the Western Harbour Tunnel project has not actually been approved and is currently unfunded. Therefore, we do not believe it relevant or appropriate to use the concept of construction fatigue of an unapproved and unfunded project as a justification for the proposed modification. The Western Harbour Tunnel project is not relevant to the construction of the WestConnex M4-M5 Link .

6.0 The Crescent / Johnston Street / Chapman Road Intersection

With respect to the proposed modifications to The Crescent / Johnston Street / Chapman Road intersection, we make the following comments.

6.1 Car Parking

It is noted at Section 4.4.2 of the Modification Report (page 4-12) that.... ***“During constriction four parking spaces on the northern side of Chapman Road would be temporarily removed”***. It is also noted that ***“at the end of construction these four parking spaces would be reinstated in the***

vicinity of the existing location". Consequently there would be "no permanent loss of parking on the northern side of Chapman Road."

We are concerned with the above assertion by RMS. There will be no additional parking on Chapman Road created as a result of the proposed Modification and there will be a permanent loss of two parking spaces on Johnston Street as a result of the proposed Modification (as noted on page 4-14 of the Modification Report).

There is no additional available space currently on Bayview Crescent, Johnston Street, Kentville Avenue, Weynton Street, Annandale Street, Railway Parade or The Crescent and there will be no additional space created as a result of the proposed Modification for car parking. As such, we challenge the assertion by RMS that at the end of construction these four parking spaces will be reinstated in the vicinity. If this is correct, RMS should provide specific details with respect to where these four car spaces will be relocated.

As a resident of Bayview Crescent, we can confirm that car parking is a daily challenge and RMS need to be accountable for the assertions made in the Modification Report with respect to the relocation of the four car spaces. Our concern is that in reality there will be a permanent loss of not two car spaces as noted in the Modification Report but six.

6.2 Access from Johnston Street to The Crescent

The proposed modification will remove the ability to turn right onto The Crescent from Johnston Street. This access is used often by the resident of Annandale to access Glebe and the Tramsheds precinct. Alternative routes would result in residents having to travel significantly further distances to access facilities and locations which are currently very easy to access.

We request that any modifications to the intersection of The Crescent / Johnston Street and Chapman Road maintain the ability to turn right from Johnston Street onto The Crescent. This access is very important to the residents of Annandale.

6.3 Access to Bicentennial Park / Jubilee Park

It is important to note that pedestrian access to Bicentennial Park and Jubilee Park from Johnston Street will be adversely impacted by the proposed modification to The Crescent / Johnston Street intersection. Pursuant to the Approved project design, access from the Johnston Street / The Crescent intersection for any residents of Annandale living on the western side of Johnston Street would involve a single crossing. The proposed Modification design would involve those same individuals having to make four crossings to access Bicentennial Park.

7.0 Other Comments

Further to the above, we would also like to express our concern in relation to the community consultation process. In our view, the process is flawed and biased in favour of RMS. We note that the public has been provided with just 28 days to make a submission in relation to the proposed modifications to the Rozelle Interchange. The Modification Report and Appendices are hundreds of pages in length and reference various other documents including the Environment Impact Statement (EIS), the Submission and Preferred Infrastructure Report (SPIR) and the State Significant Infrastructure Assessment Report (SSIAR). Each of these documents are in turn hundreds of pages in length. If the intent is to provide transparent and co-operative consultation between RMS and the community impacted, the existing process is inherently flawed.

It is acknowledged at Section 2.1.2 of the Modification Report that RMS and “a contractor” have been in consultation about the Rozelle Interchange. This process has clearly been ongoing for a significant period of time. However, those members of the community most impacted by the proposed modifications have only been made aware of the proposed modifications in August 2019 and provided a mere 28 days to digest the hundreds of pages of material and prepare submissions.

It is also noted at Section 5.4.2 of the Modification Report that as part of the modification application process RMS has had regular meetings with relevant stakeholders. It is specifically noted in Table 5-4 of the Modification Report that RMS provided a briefing for Inner West Counsellors on 12 February, 3 May, 13 May and 31 July 2019 as well as discussions with Inner West Council Officers on 18 July 2019. It is noted that in Table 5-4 that.... ***“In general, the council was supportive of the proposed changes.”*** We challenge the accuracy of this statement as we have had discussions with a representative of the Inner West Council on 3 September 2019 that attended the stated briefings and we were advised that the Inner West Council did not support the proposed modifications. I would be more than happy to provide the contact details of the representative should you require. We were also advised that the Inner West Council would be making a submission objecting to the proposed modifications of the Rozelle Interchange.

We also enquired with the Inner West Council as to why they had not briefed the residents and broader community about the proposed modifications of the Rozelle Interchange and we were advised that they were required to agree to a confidential arrangement to participate in the stakeholder engagement. As such, the Inner West Council were unable to engage with the residents and broader community. If this is correct (and we have no reason to believe that a representative of the Inner West Council would deliberately deceive members of the community) there is a worrying lack of transparency associated with the process. As Table 5-4 of the Modification Report indicates, there would appear to be a strong desire of RMS to engage with a range of parties in relation to the proposed modifications with the exception of residents and members of the community most impacted.

This lack of transparency in relation to the Rozelle Interchange is genuine and has been recently acknowledged by representatives of John Holland and CPB Contractors Joint Venture (JHCPB) at the Rozelle Interchange WestConnex Community Reference Group meeting on 6 August 2019. It was noted in the meeting notes (attached at Appendix 7) that ***“Recently trees were removed along the City West Link. Initially the community was advised that the trees were removed for safety reasons.”*** After the trees were removed, the community was advised that the trees were removed to widen the road. This “miscommunication” was acknowledged by JHCPB and it was noted by JHCPB that they ***“will strive to communicate more accurately in the future”***. It is difficult to accept that such a miscommunication of this nature could be anything other than a deliberate attempt to deceive the community.

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We would be more than happy to discuss our concerns with you should you so desire.

Yours sincerely

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