

23 October 2015

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Via email:

**Submission to WestConnex M4 East Exhibition
Stage 1 – M4 (Parramatta to Haberfield)**

Dear Mr Devine

The purpose of this letter is to submit an objection in response to the WestConnex Exhibition, specifically Stage 1: Parramatta to Haberfield (M4 widening and M4 East).

Background:

This submission focuses on the impacts of the Wattle Street (City West Link) interchange at Haberfield on Wattle Street/Dobroyd Parade. This section of the proposal includes:

- An on-ramp to the westbound tunnel and an off-ramp from the eastbound tunnel.
- On- and off-ramps at this interchange that would provide access to the M4–M5 Link.
- Realignment of westbound lanes of Wattle Street.
- Installation of tunnel ventilation systems at the corner of Parramatta Road and Wattle Street at Haberfield. The Eastern Ventilation Facility will contain five ventilation exhaust points (25 metres high), one for each off ramp and two at the M4-M5 Link interface.

Haberfield has been identified as a high sensitivity area within the M4 East Environmental Impact Statement and the area and Wattle Street is located within a heritage conservation area.

Traffic

Two entry/exit portals are proposed on Wattle Street, where traffic will continue onto Dobroyd Parade then through to City West Link and ANZAC Bridge. Wattle Street is proposed to be widened to accommodate additional lanes.

- Dobroyd Parade will not be able to handle the increased traffic flow generated by the proposal.
- Dobroyd Parade is currently a four lane road of approximate speed 60 kilometres per hour.
- The proposal will introduce a higher proportion of trucks to the traffic flow along Dobroyd Parade and this has not been sufficiently addressed in the EIS.

Acoustic Impacts

- Lots to the north of Wattle Street will be impacted by both noise and vibration during the construction and operation of the proposal.

- Noise barriers are proposed to minimise operational noise including South of Wattle Street between Parramatta Road and Waratah Street. The location of this noise barrier has been identified in the EIS however information is not provided on:
 - The design (height, width, materials) of the barrier. This information is required to accurately assess the impact of the noise barrier on the character of Wattle Street.
 - How the noise barriers will impact on the heritage character of the locality (as the entire suburb of Haberfield is identified a Heritage conservation area within the Ashfield LEP 2013).
- There would be significant acoustic impacts on dwellings in the vicinity of the Wattle Street Portals. This is illustrated by the data provided within the EIS. The noise logging station L21 is expected to experience noise intrusiveness of 144 dBA in 2021 if the proposal is to be completed compared to 117 dBA without the proposal.

Eastern Ventilation Facility

- EIS does not provide sufficient information on the Eastern Ventilation Facility
- The Eastern ventilation facility is proposed to be 25 metres high (approximately 8 storeys).
- Current zoning permits the following height of buildings:
 - North of Wattle Street: 7 metres.
 - South of Wattle Street: 9 metres.
 - Adjacent to Parramatta Road: 15 metres (Ashfield LEP 2013).
- The Eastern Ventilation Facility significantly breaches the height limits set by the Ashfield LEP 2013.
- The Eastern Ventilation Facility will dominate the streetscape and be inconsistent with the character of one and two storey residential dwellings along Wattle Street. Proposed vegetative screening of the ventilation facility will be unable to mitigate the visual impacts of facility due to its height.
- The air quality impacts of the Eastern Ventilation Facility have not been adequately addressed in the EIS. The impacts of Stage 1 of WestConnex on the concentrations of NO₂, CO and PM_{2.5} have been mapped however specific attention needs to be given to the Ventilation Facilities. The EIS needs to illustrate how properties immediately adjacent to the Eastern Ventilation Facility will not have as severe air quality impacts as properties at a further distance. This is due to the height of the exhaust towers causing further dispersal of the tunnel exhaust fumes.

Air Quality Impacts

- The air quality impacts of the proposal along Wattle Street and the eastern section of Parramatta Road have not been adequately addressed and considered.
- Figure 3 shows that while weaker concentrations (9-10 micrograms per cubic metre) of PM_{2.5} are expected to decrease, stronger concentrations (10-11 micrograms per cubic metre) are expected to increase in certain areas along Wattle Street/Dobroyd Parade and the eastern section of Parramatta Road.
- Impacts of wind patterns on dispersal of air toxins has not been adequately illustrated in the EIS. Impacts from prevailing winds (illustrated in wind roses such as those provided in Table 1) on the Eastern Ventilation stacks must be illustrated and addressed.
- Analysis within the EIS indicates how it is anticipated that there will be a build-up of air pollutants (such as PM_{2.5}) around the intersections and traffic lights along Wattle Street and Dobroyd Parade (see Figure 2). This has not been identified and addressed within the EIS.



Figure 8-69 Contour plot showing annual mean PM_{2.5} (2021-DM)

Figure 1: Annual mean PM_{2.5} without the proposal (Source: WestConnex M4 East Air Quality Assessment Report, p. 160).

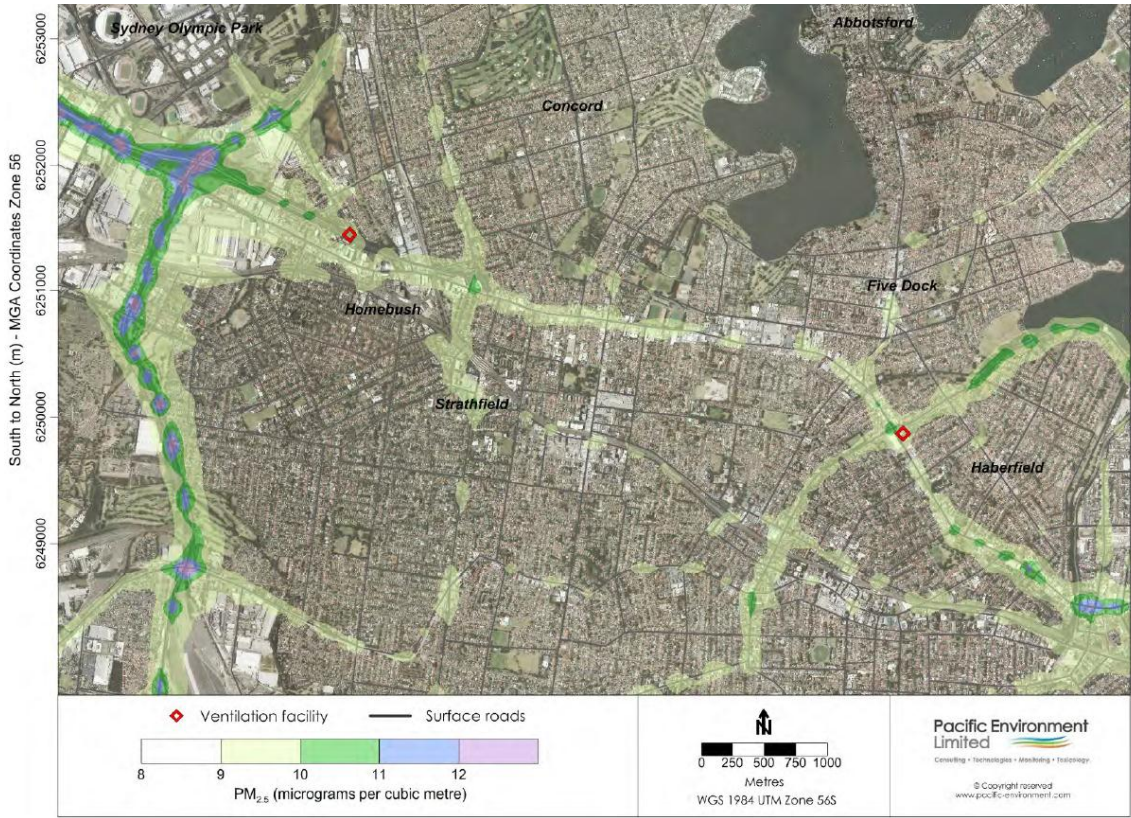


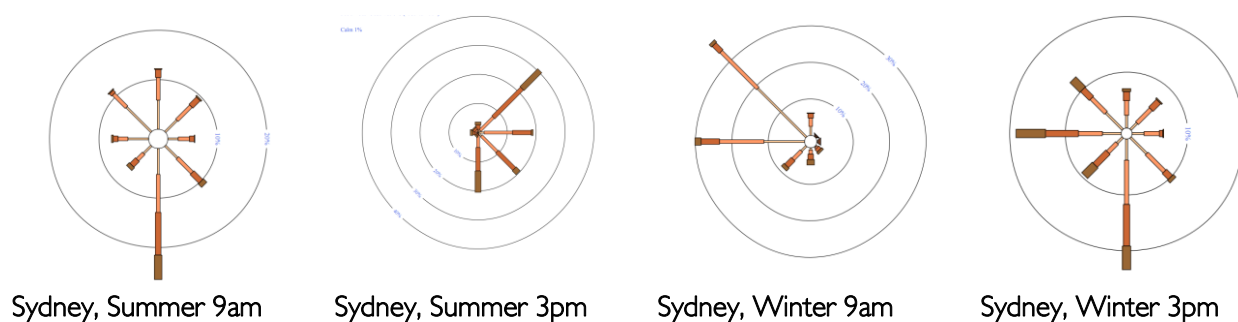
Figure 8-70 Contour plot showing annual mean PM_{2.5} (2021-DS)

Figure 2: Annual Mean PM_{2.5} with the proposal (Source WestConnex M4 East Air Quality Assessment Report p.161)



Figure 3: Comparison of PM2.5 impacts in 2021 with and without the proposal.

Table 1: Wind roses from Bureau of Meteorology.



Landscape Quality

- Lots to the south of Wattle Street are proposed to be acquired to allow for the construction of the Eastern Ventilation Facility and Wattle Street and Walker Avenue Civil Site (see Figure 5).
 - Eastern Ventilation Facility Site:
 - 15 residential properties containing 16 single dwellings would be acquired.
 - One residential flat building with eight individual dwellings would be acquired
 - Three commercial properties with three buildings would be acquired.
 - Wattle Street and Walker Avenue civil site:
 - 18 residential properties containing 21 single dwellings would be acquired
 - 35 dwellings within four residential flat buildings would be acquired
- Lots to the north of Wattle Street are not proposed to be acquired and amenity of these lots will be affected.
- The landscape character of Wattle Street will be permanently modified by the proposal through the proposed land acquisition and construction of the Eastern ventilation facility, Wattle Street widening, cut-and-cover tunnels, bridges, tunnel portals and noise walls.
- These lots are currently zoned R2 Low Density Residential.



Figure 4: Proposed full and partial acquisition of lots (M4 East Environmental Impact Statement).

- The proposal is inconsistent with the desired future character of Haberfield. The existing character of Wattle Street (facing north) consists of:
 - Single storey detached residential dwellings with pitched roofs.
 - Predominantly Federation style dwellings.
 - Low brick walls and picket fencing along front boundary.
 - Vegetated front setbacks.
 - Street trees.

Heritage

- WestConnex M4 East EIS states:
 - *These impacts would be localised around Wattle Street; however, the demolition of this number of individually listed and contributory items would result in a major adverse impact on the heritage significance of the Haberfield Conservation Area.*
 - *The project would affect the legibility of the original layout and would effectively fragment the suburb, with the area north of Wattle Street separated from the remainder of the conservation area. This fragmentation may also have an impact on the social significance of the Haberfield Conservation Area, particularly for the residents who live north of Wattle Street, who would be visually and spatially separated from the remainder of the suburb by the project.*
 - *The project would result in a change in the visual character of the conservation area, with a high visual impact.*
 - *The ventilation facility would be out of character with the conservation area.*
 - *Noise barriers (up to five metres high along the south-eastern side of Wattle Street) would be visible over the back fences of the retained properties along Walker Street and would have an adverse impact on their setting.* (WestConnex M4 East Environmental Impact Statement, p. 19-41).
- The proposal will permanently diminish the Heritage character of Haberfield and Wattle Street.

Overall, the documents of WestConnex M4 East submitted for exhibition were disappointing considering the time, money and resources that went into their production. The EIS has not adequately identified and addressed several issues including

- The Eastern Ventilation Facility and the impact of prevailing winds on the exhaust fumes.

- The design and visual impact of the noise barrier proposed along Wattle Street.
- The design of the entry/exit portals on Wattle Street.

It is unacceptable that the impacts of the additional traffic on Dobroyd Parade, caused by the Wattle Street tunnel portals and additional lanes, have not been modelled and addressed accordingly. The EIS has failed to address the impacts of congestion, noise and air pollution (especially at traffic lights and intersections) along Dobroyd Parade. The proposal cannot be adequately evaluated until these issues have been addressed.

Should you wish to discuss this submission further please contact me on (02) 9519 4994 or email Rohan@aedesignstudio.com.au.

Sincerely,

ae design partnership Pty Ltd

A handwritten signature in black ink, consisting of a stylized 'R' followed by a long, horizontal, slightly wavy line.

Rohan Dickson
Director