

14 Kingston St

Haberfield

NSW 2045

28<sup>th</sup> October, 2015

Westconnex M4 East Tunnel (SSI 6307)

NSW Department of Planning and Environment

GPO Box 39, Sydney, NSW 2001

To Whom It May Concern,

RE: Response to WestConnex EIS

I make the following submission to the Environmental Impact Statement exhibition for the WestConnex M4 East Tunnel Project (SSI6307).

I am opposed to the construction of the WestConnex project, and in particular the spending of \$15.4bn of taxpayers' money on this project without significant measureable return on investment. The business case for this project needs to be released to the public. The EIS claims a travel time saving of 6 minutes for people using the tunnel.... but then dumps them into already congested roads. There has been inadequate consideration for alternative solutions to address Sydney's traffic problems, such as public, pedestrian and cycling transport solutions, and the EIS fails to consider less destructive tunnel or road solutions, or outline the clear reasons why the 'long tunnel' option was discounted. There is inadequate consideration for the devastating impact this project has on the lives of people living in the communities of Haberfield and Ashfield, and the destruction of heritage items. Page v of Vol-1A of the EIS states "minimising cumulative impacts on the local community". Clearly whoever wrote this does not have any concept of the impact on the local community.

I have spent many, many hours in recent weeks attending meetings, and reading the EIS in order to understand the justification and ramifications of this project, and this has led me to raise the following concerns.

**Impact on Haberfield Public School (HPS) and broader Haberfield Community**

I have two children, one who already attends HPS, and another who will commence kindergarten in 2016. HPS is a wonderful school, with dedicated teaching and support staff and a wonderful community feeling. We enjoy the feeling of community at our local school and the local area and are very concerned about the loss of community due to the destruction of local property, and the impact on our children's health and learning environment with the proposed construction.

I object to the construction of unfiltered ventilation stacks less than 500m from Haberfield Public School. It is appalling that in the 21<sup>st</sup> Century, the NSW Government believes it is acceptable to build a tunnel without filtration. Mike Baird and Duncan Gay would not want this on their own doorstep, so why do we have to. Recent tunnels which have been constructed in Madrid and Tokyo have installed such filtration systems, and even a report from the RTA itself in February 2004 "Electrostatic precipitators and ventilation in road tunnels in Japan" recommends that the RTA should investigate the use of Electrostatic Precipitators in Sydney tunnels.

([www.rag.org.au/tunnel/graphics/japan\\_road\\_tunnel\\_ventilation.pdf](http://www.rag.org.au/tunnel/graphics/japan_road_tunnel_ventilation.pdf) accessed 28/10/15). The EIS does not include an independent assessment of the benefits of filtration, or other pollution reduction measures, it simply seems to discount this option at all.

The EIS does not take into consideration the full extent of the pollutants that are generated from cars, including heavy metals, odours, and other noxious gases, and does not consider the adverse health impacts of these pollutants. It also does not consider the long term exposure to pollutants, it seems to refer to 15 minute or 1 hour exposure intervals (not peak exposure levels). For children who are attending HPS for at least 6 and often up to 8 hours a day, at an elevated receptor location, they will be exposed to this in far greater concentrations. Children are also more sensitive to breathing in these pollutants into their growing bodies and lungs.

In the WestConnex briefing at HPS on 12th October, one employee from the WDA claimed it was more cost effective to build cars which pollute less than to install tunnel filtration, and with the recent exposure of VW's dodgy practices, this is an unbelievable assertion. What the EIS has not considered is the total cost of health impacts on the community who will experience additional pollution effects from the unventilated emissions stack. The increased incidence of Asthma, heart and lung issues are well known and identified in the medical literature available. What is the cost of additional medicare expenditure, hospital admissions, lost work days due to the adverse health impacts of this pollution. This must be considered for a proper business case to be justified.

In the EIS there has also been inadequate assessment and dispersion modelling of the tunnel ventilation pollution and the impact on the broader local community. As our children go to school and live within 1km of the proposed stack, they will be subject to these toxins up to 24 hours a day, 7 days a week. I am very concerned about the cumulative health impacts caused by their exposure to this pollution.

There has also been no explanation in the EIS as to why the height of the ventilation stacks at Haberfield will be only 25m instead of 30.5m which is proposed at the western end of the WestConnex. Surely a higher tower will better disperse the pollutants. The proposed location for the tower is also not at the highest point in the area, so it's unclear why this location was selected.

I am also very concerned about the additional noise generated during the construction phase, vibrations from tunnelling, blasting and substantial number of high level noise impacts as identified in Table 32 on page 87 of Volume 2C, Appendix I. This table seems to indicate up to 16 NML exceedances per day. This will adversely impact our children's learning environment, the ability for them to hear their teacher and play during their lunch breaks.

The additional traffic from construction, in particular large and heavy vehicles (page v of Vol-1B states "construction of the project would generate additional heavy and light vehicle traffic on the surrounding road network") with the proposed number of vehicles per day exiting the Parramatta Rd and Wattle St sites, will impact the traffic on surrounding local residential streets, causing additional congestion on local streets, frustration of drivers, and adverse consequences for pedestrians, in particular children. These vehicles will struggle to see small children, and I am very concerned about unfortunate accidents occurring.

The streets around Haberfield are already busy with resident parking. I foresee significant parking issues caused by the 120 construction workers at Walker Ave, and the 75 construction workers expected at Parramatta Rd (Vol 1A-page 6-50). I do not believe your project has made sufficient provision for parking for these workers and as a result, they will be clogging up the parking in local streets and preventing parents from parking near the school to pickup/drop off their children. In

addition, this traffic will be unfamiliar with local school zones, and will need to be aware of foot and bicycle traffic, in particular young children, and this increases the safety risk to our community.

I note with interest Page 64 of Appendix M which indicates that an “Air quality monitor at the school before construction.” And I look forward to seeing the results of the measurements before, during and after construction.

In order to minimise impact on our children’s health and learning environment, I request that if this project is to proceed:

- Filtration put into tunnel stack
- Immediate installation of the air quality monitoring at HPS
- Noise abatement measures at the school, including insulation and installation of double-glazed windows, and air conditioning with particulate filters
- No construction traffic to use Bland St or Denman Ave, and no parking in the area around the school to be used by construction workers.

### **Impact on Heritage**

Haberfield is a unique suburb, recognised as a Heritage Conservation Area since 1985 and listed on the national register since 1991. This project is driving a large divide through our suburb and destroying items of local significance, with the destruction of over 180 homes, including 53 in the Haberfield Conservation Area. The EIS Heritage Impact Assessment Report (non-Aboriginal Heritage Impact Assessment in Section 2H of the EIS) is damning of impact on Haberfield’s unique heritage, it will forever change the original vision of Robert Stanton’s design, with a devastating loss to NSW’s heritage. Ventilation stacks, tunnel portals and noise abatement walls do not belong in a Heritage Conservation Area.

The proposed ventilation stack is ugly, unsightly and completely at odds with the local community character and streetscape. No consideration has been made to blend this in with the local environment, instead it is an unsightly blight on the landscape on the main entrance to our Garden Suburb.

This road also breaks up our community, and isolates the Haberfield community west of Wattle St, many of whose children attend Haberfield Public School.

Yasmar Estate is a national significant heritage item, and after this project, there will be up to 10 lanes of traffic right outside it’s front gates. (Vol 1B page 13-36 acknowledges the “high impact, high significance to this Local Character Zone.) The blasting and tunnelling which will be required on Parramatta Rd to construct the WestConnex tunnel could have devastating impacts on this property, and I do not believe this has been adequately considered in the submission.

### **Impact on local community amenity**

This project will have significant impacts on the accessibility for the residents in the local area:

- Closure of Orpington St – impacts accessibility to Ashfield Station, forcing changes to local bus routes (406), as well as forcing local traffic to travel eastbound down Parramatta Rd to turn onto Liverpool Rd, making a significant impact on travelling time for pedestrian and car based travel (seeing as Chandos St will be closed and Bland St will have limited access south of Parramatta Rd due to construction activities).
- Proposed future closure of Mortley Ave (Vol-2A, page 11-3) – will impact local traffic who access Timbrell Park for sports, and cycling, this also impacts local traffic travelling to

Drummoyne and to the Bay Run. This also means the only road westbound out of Haberfield (apart from via Parramatta Rd) will be via Ramsay St. This will be a significant inconvenience for local traffic.

- Proposed right turn only from Tunnel exit onto Waratah will significantly increase the amount of rat run through our suburb, and impact the safety of children walking to Dobroyd Point School. This right hand turn will also cause queuing back into the tunnel further compacting the cumulative smog and pollution produced by cars
- We already have significant rat runs in Haberfield, impeding local traffic and making it unsafe. Ramsay St is congested every day in the peak periods, and this congestion has now spread to Dalhousie St, and St David's Rd, as well as Denman Ave and Bland St around HPS. This makes it difficult for locals to go about their daily life. There is frequent queuing across the intersection of Ramsay St and Dalhousie St, making it unsafe for children and the elderly to use this intersection alone. I like to walk my children to school as it reinforces the healthy lifestyle, but there are frequent safety risks which I expect will significantly deteriorate with additional construction traffic using our local streets, 24 hours a day, 7 days a week.
- The local roads are already congested, and the EIS shows that additional 80 heavy vehicles per hour in the morning peak and 60 in the afternoon peak. This will further compound congestion.
- Bland St and Denman Ave are bicycle paths in the local area. These trails will be unsafe to use with the additional construction traffic. Bland St provides a key cycle path between Ashfield and Haberfield. The adverse impact on cycle ways in the Ashfield / Haberfield area is not considered in Vol-1A p5-53 or 6-44.
- The report acknowledges that the Westconnex tunnel will only exacerbate the already congested choke points at the intersection of Parramatta Rd and Hume Highway, Sloane St and Timbrell Drive, Haberfield. Vol-1A page 4-26 clearly states "There would be issues with vehicles queuing back into the tunnel during the morning peak" and Vol 1-A p8-25 "Capacity restrictions at the Dobroyd Parade/Timbrell Drive and Parramatta Road/Hume Highway intersections are likely to block through adjacent intersections and lead to significant queuing on the project off-ramps in 2021." I have not seen any modelling in the EIS which shows what the impact on pollution is on the local area should this scenario occur. And it will occur on a regular basis, every peak hour, every day.
- The project does not provide any improvement for the bottleneck intersection at Frederick St, Wattle St, and Parramatta Rd. The report shows that this remains at level F LOS. This is a significant bottleneck for all traffic and impacts local and through traffic. 8-25 in Vol 1-A notes the opening of the M4-M5 Link and the provision of ramps on Wattle Street significantly reduces congestion east of Bland Street, but re-introduces significant delays at the Parramatta Road and Wattle Street intersection. So no improvement at all...

### **Anomalies and inaccuracies in the report**

In reviewing the EIS, I have noted the following anomalies and inaccuracies:

- The anticipated operational power requirements of the two ventilation stacks appear incorrect. Vol 1A page 5-56 – Table 5.5 shows the Western ventilation facility requiring 10,700 MW/year, whereas the Eastern ventilation requires only 4,525 MW/year. Seeing as the Eastern facility is much larger, then this must be incorrect.
- The traffic figures for Queens Rd cited on page 8-8 of Vol-1A appear incorrect. I travel every day westbound along Ramsay St, Queens Rd, up to Concord Rd in the morning during the

morning peak, and return along the same roads in the evening peak. The morning peak traffic is definitely higher in the eastbound direction, and higher in the westbound direction. So I don't know when you did your traffic modelling in this area or when the monitoring was carried out, but there is significantly more traffic in the eastbound direction in the morning peak, and in the westbound direction in the evening peak.

- Section 5.3.3 on Page 55 of Appendix M does not acknowledge that there is before, after school and vacation care facilities at Haberfield Public School. Similarly, Table C4 in Appendix C to Appendix M
- The projected traffic figures also do not take into account recently announced initiatives from Asciano (<http://www.smh.com.au/business/asciano-spends-100m-on-expanding-sydney-freight-hub-network-20151008-gk44qp.html> accessed 28/10/15) who will be building a freight transit facility in Western Sydney, connecting to Port Botany by Rail. This would reduce the number of heavy transport vehicles who would use the WestConnex and require transport to Port Botany.

I also cannot fathom why, as part of this Stage 1 project, that you are proposing to build tunnel stubs and on/off ramps being built for the Stage 3 project. This should not form part of this Stage 1 project, as this project is not yet funded.

I do hope you consider my concerns and issues with this fundamentally flawed project, and the devastating impacts this project will have on my family and the broader Haberfield community. I cannot agree with Mike Baird's comments that we have to give a little for the greater good of Sydney, it appears Haberfield and Ashfield are bearing the brunt of ill-informed planning decisions, and are spending at least \$15.4M of tax payers' money on a project that will not achieve its outcomes or objectives.

Yours Sincerely

Nuala Ward