

18/98 Chandos Street
ASHFIELD NSW 2131

1 November 2015

Director, Major Projects Assessment
Department of Planning and Environment
Application number SSI 6307
GPO Box 39
Sydney NSW 2001

Dear Sir/Madam,

SUBMISSION – EIS –WESTCONNEX M4 EIS (SSI 6307)

I make this submission to comment on the Environmental Impact Statement of Westconnex M4 East Application Number SSI6307. I object to the Westconnex M4 East motorway proposal.

The realignment of Parramatta Road to facilitate the tunnel portals at the Parramatta Road Interchange will result in a significant increase in noise at numerous residences between Orpington Road and Bland Street, and particularly at 98 Chandos Street (SP66454), which contains fifty-six residential lots. The realignment of Parramatta Road will result in the distance between the nearest point of the roadway and the apartment building at 98 Chandos Street being reduced from approximately 40 metres to approximately 6 metres. As noted in the EIS, the effect of the reduction in distance to Parramatta Road will be compounded by the demolition of existing noise screening provided by adjacent buildings that are to be acquired and demolished to facilitate the interchange.

98 Chandos Street is identified in EIS Vol. 2C App. I as a receiver considered for additional noise mitigation, due to the triggering of at least two of the NMG criteria:

1. The predicted noise build noise levels exceed the NCG controlling criterion and the noise level increase due to the project is greater than 2dBA; and
2. The cumulative limit for additional noise mitigation is exceeded.

EIS App. I Clause 14.20 states that “Noise barriers have been considered in this assessment, however, based on further feasible and reasonable considerations the barrier may potentially sterilise future use of the adjacent land by restricting visibility and/or access. Therefore, consideration of at-property treatments for the triggered receivers instead of a barrier have been recommended and are to be further considered during detailed design.” The omission of noise barriers will result in a significant increase in noise on terraces and balconies in 98 Chandos Street that will not be mitigated by any of the at-property architectural treatments contemplated in the

EIS. This will cause a major reduction in amenity for all of the affected properties. In essence, the EIS is justifying the omission of noise barriers by reference to the impact on the value of land that the State has or will acquire as part of the Westconnex project. The EIS proposes that existing residents suffer loss of amenity in their property to avoid future impacts that “may potentially” occur on unoccupied adjacent land, the future use of which the EIS is silent. This represents a subordination of the health and amenity of existing residents to the commercial management of land acquired by the government.

The EIS indicates that external noise levels are expected to be greater than 10 dBA above the NCG target at 98 Chandos Street. EIS Vol. 2C App I Section 7.5 indicates that where the NCG internal criteria in habitable rooms can only be achieved with windows and vents closed, then mechanical ventilation should be provided (subject to individual consultation with dwelling owners) to ensure sufficient airflow inside the dwelling, so as to meet the requirements of the Building Code of Australia. Given the existing building construction at 98 Chandos Street, in which most of the bedrooms and living rooms have little ceiling void space in which to install mechanical ductwork, it is unclear how this can be practicably achieved. It will be very difficult and disruptive, if not impossible, to meet the NCG target at 98 Chandos Street without the provision of a noise wall.

The EIS identifies twenty-one (21) buildings, between Orpington Street and Bland Street, as receivers that should be considered for additional noise mitigation. Sixteen (16) of these buildings trigger both of the cumulative limit and the noise increase criteria identified in the EIS. Many of the said buildings, including 77-79 and 98 Chandos Street and 1, 1A, 3-5, 7-9, 11, 13, 15 and 17 Loftus Street are high density residential constructions. A large number of residents would benefit from a noise wall, which would provide significant attenuation of noise for at least the first two floors. A noise wall should be constructed along the westbound side of Parramatta Road, running from Orpington Street to Bland Street. At the Chandos Street intersection, a noise wall should be provided on the east side of the street in order to provide noise mitigation for 77-79 Chandos Street and should be provided along the southern side of part of the proposed driveway at 98 Chandos Street in order to provide noise mitigation for 90 Chandos Street.

The noise wall should consist of clear acrylic or similar panels where a non-translucent wall would result in unacceptable overshadowing of properties. The noise wall should be similar to the 455m long wall that was constructed along the north side of Syd Einfeld Drive, Woollahra, in 2013-2014, which consists of combination of reinforced concrete and acrylic panels. The noise mitigation that I am proposing is not more onerous than that which was constructed along Syd Einfeld Drive and, due to the large number of residents that would otherwise be affected by noise, the benefit would be great.

EIS Vol. 2C App. I Clause 8.5 states that “Roads and Maritime does not consider it reasonable to consider noise mitigation above the ground and first floor.” Due to the realignment of Parramatta Road and the associated demolition of existing buildings that provide acoustic screening, many residents of 98 Chandos Street on the floors above first floor will receive a significant increase in noise due to the project. The EIS is deficient in that it has completely excluded the occupied upper four floors of 98 Chandos Street in its modelling. There is no scientific basis to model only the noise impacts on first two floors of affected properties or to determine that a residence above the first

floor should not receive noise mitigation regardless of whether modelling indicates that it meets the noise criteria for provision of mitigation. Basic trigonometry would inform the proponent that in this case there will be little difference in the distance between noise sources and receivers located at ground floor and, for instance, second floor.

It is completely unreasonable to disregard the impact on residents above the ground and first floors at 98 Chandos St. It should also be noted that the level of Parramatta Road at the intersection with Chandos Street are well above the ground floor level of 98 Chandos Street. For the purpose of identifying noise impacts of the realigned Parramatta Road on 98 Chandos Street, the First Floor ought to be considered to be the closest to Parramatta Road.

In summary, if the proposed project proceeds, the following should be provided:

1. A noise wall should be constructed along the westbound side of Parramatta Road, running from Orpington Street to Bland Street. At the Chandos Street intersection, a noise wall should be provided on the east side of the street in order to provide noise mitigation for 77-79 Chandos Street and should be provided along the southern side of part of the proposed driveway at 98 Chandos Street in order to provide noise mitigation for 90 Chandos Street.
2. The criteria for the provision of architectural noise mitigation should be the same for all residences and all floors. The EIS is deficient in that it has completely excluded the floors above the second floor in its modelling and recommendations, except to state that RMS has a policy of completely excluding even the consideration of noise mitigation above the second floor.

I wish to register my objection to the government awarding tenders for construction of the project before a full business case has been publicly released and before the EIS had been published and the public has exercised its right of participation. The EIS is supposed to allow for genuine public input and to result, potentially, in approval, non-approval, or approval with modifications, of the project. The present procedure makes a mockery of that right.

The government and the EIS have failed to publish a robust business case for the proposal and in these circumstances it is disgraceful that billions of dollars of government funds are proposed to be expended on the project.

I have not made a reportable political donation.

Regards

Gillian Raeburn