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2<sup>nd</sup> November 2015

Brent Divine  
Senior Planning Officer  
Department of Planning and Environment  
GPO Box 39,  
Sydney NSW 2001.

Dear Mr Devine,

Macken Strategic Planning has been engaged by The Infants' Home (TIH) on cnr Frederick and Henry Street, Ashfield to review the EIS for M4 East Extension and prepare a submission on their behalf outlining their concerns and issue with the proposal. TIH is a charitable organisation which integrates early childhood education, early intervention and specialist health services for young children in the Sydney area. TIH currently provides these services to over 2,200 children and families, especially to those living in vulnerable circumstances, from across the greater metropolitan area. TIH is one of Sydney's oldest charities and has been delivering services to children and their families from this site for 140 years.

On behalf of TIH we have read the EIS and supporting documents and provide the following comments and suggested changes to reflect the concerns of The Infants' Home and to try to minimise the impacts of the proposed M4 East extension on their operations. These comments are grouped into the four main issues and concerns;

- The proposed tunnel alignment;
- The location and operation of the ventilation stacks;
- Managing construction impacts; and,
- Local amenity improvements.

**The proposed Tunnel alignment:**

The rationale behind the preferred route being chosen is both understandable and supported. This route will allow for a shorter tunnel and allow for more medium density housing along Parramatta Road. However the preferred route for the tunnel comes very close to TIH property, travelling just a few metres from the north western boundary and under the adjacent Bunnings building. We believe that during construction, vibration and subsidence could have a significant impact on some The Infants' Home buildings, many of which are heritage listed. TIH site, some of its building and all its landscape are heritage listed. We request that the proponent be required to undertake a full

dilapidation report and a heritage assessment of all The Infants' Home buildings and structures prior to construction starting and that the proponent be required to make good any damage arising from this construction.

TIH is also concerned that having the Tunnel so close to their property may sterilise the future redevelopment and expansion of services. The Infants' Home currently has an approved DA for a large car park which is essential for the service expansion to meet the identified needs. The Infants' Home is concerned that having the tunnel so close to the centre, and at a depth of only 30 metres, may lead to restrictions being placed on future excavation of the property. The Infants' Home has also recently been zoned for residential development. While the Infants' Home has no immediate plans to develop in accord with this zoning, it does represent a significant uplift in the value of the property. We are seeking assurances that the development of the M4 East tunnel will not in any way prevent the orderly development of the facility at Frederick Street. Furthermore, should the tunnel place any undue development restrictions on The Infants' Home properties they have a reasonable expectation of compensation.

The Infants' Home accepts the rationale behind the decision to have the tunnel run to the south of Parramatta Road to allow for the redevelopment of properties along the road. However the draft **Parramatta Road Urban Transformation Strategy** indicates that the section of Parramatta Road near the Frederick and Wattle Streets is unsuitable for redevelopment. Therefore we believe that there is a strong case to amend the proposed route for the tunnel to bring it back under Parramatta Road alignment further to the west of Frederick and Wattle Streets. This would reduce the number of properties affected by construction without sterilising any future redevelopment opportunities.

Many of the concerns The Infants' Home has in relation to the proposed tunnel alignment can be addressed by reconsidering the alignment of the Parramatta Road and Wattle Streets, westbound on-ramps. Moving both of these on-ramps slightly to the north and west would significantly reduce the tunnels impacts on The Infants' Home.



**Location of the ventilation stacks:**

The suggested location for the ventilation stack in the EIS is generally supported and The Infants' Home does not support any proposal to relocate the facility to the southern side of Parramatta Road. We note the EIS suggests the preferred site was chosen to minimise any impacts on significant "community receptors" like Haberfield Public School. We would like to remind the proponent that The Infants' Home has hundreds of children onsite every day, many of whom have special educational and health needs. We believe The Infants' Home should also be regarded as a significant community receptor. If there is any proposal to relocate the facility we strongly believe it should be moved further away from The Infants' Home.

However the Infants' Home remains very concerned about the deterioration in air quality following the opening the Tunnel. We are also concerned that some of the assumptions the EIS is basing its findings on may be flawed. The recent revelations that several vehicle builders have been falsifying their emissions testing should prompt the proponent to revisit its assumptions and consider higher air quality targets both within the tunnel and around the ventilation facilities. The Infants' Home would also like to see continuous, independent, air quality monitoring and reporting following the opening of the tunnel. We would welcome the opportunity of working with the operator to explore

the implementation of predictive monitoring, for days when air quality might be unacceptable. The Infants' Home has a large number of children with special health needs whose parents we would like to be able to warn when air quality was a possible threat to their children's health. We would also like assistance from the proponent on how The Infants' Home can be insulated and better air conditioned to minimize any adverse health impacts arising from the construction and operation of the tunnel.

### **Construction impacts and disruption:**

The construction of the M4 East tunnel will have a significant and adverse impact on the day to day operations of The Infants' Home with the location of the tunnel's main construction site, immediately to the east of the centre being a particular concern. The Infants' Home is likely to be adversely impacted by noise, fugitive emissions and dust from this site. These will potentially restrict the operations of The Infants' Home and we would like to explore options for mitigating these impacts. We would welcome the opportunity of meeting with the proponents to discuss what mitigation opportunities are available to ensure The Infants' Home can continue its day to day operations.

The construction of the tunnel will generate considerable employment and much of this workforce will be seeking access to the site around the Frederick/Wattle Street precinct. This will generate extra traffic as well as put pressure on the parking in neighbouring residential streets. Any extra pressure on parking will have a serious impact on The Infants' Home as almost all the staff and families access their services using a private vehicle. To mitigate this issue we suggest the following be considered as part of any conditions of consent;

- As far as is practicable, parking should be provided onsite for all construction workers.
- Work with Council to make Henry Street one way only to prevent it being used as a rat run for workers accessing the construction zone and for other motorists seeking to avoid congestion getting on to Parramatta Road
- Introduced timed parking on Henry Street to prevent it being used for workforce parking.
- Assist The Infants' Home in building their approved onsite car park before construction on the tunnel begins to reduce the impact on children, families and staff.
- Restrict truck and vehicle movements to outside peak traffic times.

The Infants' Home will be economically impacted by the construction of the tunnel. It is reasonable to assume that many families (especially families on the Haberfield side of Parramatta Road) will consider sending their children to other facilities, as access becomes constrained and traffic around the centre deteriorates. We would welcome the opportunity of exploring compensation from the proponent should the decline in enrolments threaten the financial viability of The Infants' Home.

### **Local amenity improvements:**

The EIS suggests that, once completed, there will be significant improvements to local amenity, including reduced traffic and better public transport options. Of particular interests for The Infants'

Home is the suggested reduction of heavy vehicles using Parramatta Road and the surrounding road network. There is a concern however that many of commercial vehicles will be discouraged from using the tunnel because of the proposed tolls, especially in off peak times. This could be mitigated by imposing a toll on commercial vehicles seeking to continue to use Parramatta Road.

The proponent is proposing to compulsorily acquire some of the properties adjacent to The Infants' Home as part of the construction of the M4 East, including the Bunnings building. This presents a unique opportunity to reconfigure The Infants' Home with the possibility of creating an access road to the facility from Frederick Street. We would welcome the opportunity of exploring this option with the proponent.

**Conclusion:**

The proposed M4 East Extension will have a significant impact on The Infants' Home. With good communication and cooperation these impacts can be ameliorated and managed. It is essential that the proponent, and the eventual constructor, is mindful of The Infants' Home operations and services and is prepared to accommodate The Infants' Home needs, to ensure these important services continue to be provided to families and children in Sydney. We would welcome any feedback on how the suggested changes and amendments suggested in this submission are to be addressed. Furthermore we would welcome an ongoing, direct communication between the proponent and The Infants' Home to discuss how our concerns can be addressed.

Yours sincerely

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