

Director  
Infrastructure Projects, Planning Service  
Department of Planning and Environment  
Application Number SSI 6307

Ref: WestConnex M4 East EIS Feedback Submission

I am a long-time resident of Concord and I am writing to express my concerns about the WestConnex M4 East EIS report. I understand that the M4 East project provides the benefit in relieving road congestion between Concord and Haberfield, savings in travel time through traffic, however the proposed design in the EIS do not minimise the impact of the project (refer to detailed concerns below). In the EIS, the preferred design selected against alternatives considered does not have merit and is bias. The process that has been taken included some major design changes announced in June 2015 where community consultation is considered insufficient prior to EIS issued in early September 2015. The design proposed in the EIS is simply not a refinement but rather a redesign of the tunnel route and interchanges. These changes affect a significant number of stakeholders who were unaware until EIS is issued, thinking that the design essentially remained the same as in the preliminary concept design and therefore haven't had the time to consult and/or provide feedback prior to the EIS issued. Furthermore, there was no refinement in the design released since June 2015 due to the short 3 month period prior to EIS issued. With proven history on similar infrastructure being unsuccessful and compounded by unknown future stages with proceeding and/or approval, it would be prudent that this EIS be rejected until the proponent has considered community feedback to incorporate/refine the design of stage 1 and together with details including impact and funding for the future stages of the project. Otherwise there will be irreversible damage to the local environment and community in building an infrastructure that ends at Haberfield without achieving its project objectives.

I have the following concerns with the proposal around Concord Rd as the proposed design is illogical and options proposed are not thorough. The impact resulting from this design is unacceptable.

#### **1. NO VALID REASON FOR A CONCORD RD INTERCHANGE**

Volume 1A, section 4.4.3 of the EIS does not provide any substantial reason for tunnel access at Concord Rd Interchange. The overall project objectives of the WestConnex Tunnel (Volume 1A, section 3.3) including the goals of NSW 2021 (volume 1, section 3.1) will be met if the proposed Concord Rd Interchange is not built. Without the proposed Concord Rd Interchange, there will be significant cost savings and most importantly have no impact to the local community as existing roads can cater for the bulk of motorists' requirements.

The EIS indicates that Concord Rd interchange will provide access from key centres of Strathfield and Rhodes to the M4 East tunnels. The existing roads at Concord Interchange provide M4 westbound travel from all directions. The proposal for a "Disneyland" type Concord Rd Interchange will have a detrimental impact on the local community: being used as a main 24/7 construction site for civil and tunnelling works; the acquisition of many properties (residential and apartment dwellings) including heritage listed, landscape, local roads, reserves; the acquisition of church grounds; pedestrian access restriction; visual and light spill on residents in particular the apartment block at corner of Parramatta Rd and Young St; vibration, dust and noise due to construction works; unsightly noise walls; noise projected from elevated on-ramp bridge over Concord

Rd; an unsightly three level interchange which is uncommon in Sydney; and high traffic congestion at Concord Rd as a result from heavy vehicle movements at Concord Rd construction site.

This interchange is completely unnecessary as Rhodes, Sydney Olympic Park and Sydney Markets will be catered for by Homebush Bay Drive Interchange (volume 1A, page 4-18) some 2.3km away and Strathfield is not considered a key centre for population or employment growth. The report has identified key centres as being Sydney Olympic Park, Rhodes and Burwood. The proposed Concord Rd Interchange does not provide any benefit for Burwood as motorists would not travel west for M4 East Tunnel. The proposed (unusual "Disneyland" style) interchange, only serving Strathfield for eastbound travel, is unjustified and unwarranted given the long list of major impacts if the proposed interchange is approved.

Volume 1A, section 4.4.2 of the EIS indicated the options considered for access to the M4 westbound, however the option to improve and retain the existing arrangement was not considered as this is the most effective and had the least minimal impact out of all the options. A better solution is to retain the westbound on-ramp to the M4 from Concord Rd northbound, retaining the left turn from Parramatta Rd eastbound to the M4 westbound and not providing any new on-ramps. Concord Rd southbound for M4 westbound travel can be improved by un-signalised left turn dedicated lanes (up to two) on Concord Rd onto Parramatta Rd. This option is of the least cost and has no adverse impact as it is resurfacing existing roads.

What does it mean without the proposed Concord Rd Interchange?

- Access for M4 westbound travel and exit for M4 eastbound travel as it is currently.
- No access for M4 tunnel for eastbound travel and exit for M4 tunnel westbound travel, however this may only affect residents around Strathfield and Concord which is considered insignificantly small as Homebush Bay Drive Interchange, which is less than 2.3km, will provide access to key centres such as Rhodes, Sydney Olympic Park and Sydney Markets. It is likely that local residents near the interchange will continue to travel on local roads for eastbound direction which will be less congested due to bulk of vehicles in the M4 tunnel rather than to travel to the interchange and pay the toll for eastbound tunnel travel.
- Lesser traffic around Concord Rd due to the majority of vehicles travelling in the main tunnel.
- Zero property acquisition instead of 51 residential properties (some heritage listed).
- No landscape changes otherwise major landscape works with irrigation system.
- Alexandra, Edward, Sydney, Young Streets and Concord and Taylor Lanes will not be acquired.
- Pedestrian access on western side of Concord Rd maintained and no overpass pedestrian bridge on eastern side of Concord Rd
- Reduction in sub-surface acquisition and less likelihood of property damage due to no underground ramps to connect to main tunnel.
- No high voltage 22kV substation and reduction in power usage as there is no longer a requirement of ventilation fans and lighting required for ramps.
- Area will not be a construction site and therefore no dust or noise generated, and lesser traffic congestion from the absence of heavy vehicles used for tunnelling works.
- No unsightly bridge over Concord Rd
- No impact to local area and community if the main tunnel was also to be realigned to follow Parramatta Rd, both in the east and west directions.
- Achieves the goals and objectives of the project.

Furthermore, in volume 1A section 4.4.3 of the EIS, it is not understood why an interchange on Parramatta Rd located west of Wentworth Rd was not put as an option for consideration as significant number of feedbacks were provided in early 2014 when the preliminary concept design was on display for consultation. This suggestion was the obvious as it minimises impact due to a high number of run-down non-operating commercial premises along Parramatta Rd east of Mosely St. An interchange along the main traffic route minimises traffic congestion and is the normal design as proposed in the EIS for Wattle St and Parramatta Rd Interchanges at Haberfield. The options proposed and its merit indicated in the EIS are not thorough and are stated without much consideration.

## **2. UNNECESSARY BRIDGE OVER CONCORD RD**

The EIS indicates a new overpass bridge over Concord Rd (volume 1A, sections 4.4.3 and 5.8.1) to carry traffic from Concord Rd southbound to M4 westbound. It will have a maximum height of 8 metres above Concord Rd. This means that the interchange will have three levels (M4, Concord Rd and new bridge) and is uncommon in Sydney metropolitan area except for "Light Horse" Interchange at Eastern Creek (interchange at intersection of motorways M7 and M4). Concord Rd is not an arterial road and this new bridge will have significant impact in terms of noise, visuals and lighting. The bridge will not have any noise barriers with ineffective and undetailed noise reduction features indicated in volume 1 page 7-43. Due to its elevated height, noise and lighting will have a high impact on residents around Franklyn, Ada, Edward, Alexandra and Young Streets. In particular, it will be directly situated behind the second or third level of an apartment block at the corner of Parramatta Rd and Young St of around 10 metres away from the building.

### **Better alternative instead of the overpass bridge**

The EIS report has indicated that a significant improvement in traffic around Concord Rd will result due to the M4 tunnel (majority of vehicles on Parramatta Rd and alternative local route Patterson St, Gipps St and Queens Rd will be moved inside the tunnel). The traffic movement proposed by the new overpass bridge can be achieved through existing surface roads and implementing traffic control improvements to the existing arrangement. This can be achieved by creating dedicated lane(s) using un-signalised left turn at Concord Rd southbound onto Parramatta Rd and maintaining the existing un-signalised left turn at Parramatta Rd onto the M4. The creation of dedicated lane(s) will prevent left turn on Parramatta Rd (outside the Fraser Motorcycles premise) for all other motorists except for motorists from Concord Rd, to free up congestion on the section of Parramatta Rd between Concord Rd and M4. For all other motorists, existing road configurations are available to provide the same M4 westbound access. For example, Parramatta Rd travelling eastbound can turn left at Concord Rd for entry into M4 westbound travel, and Leicester Ave northbound can proceed to Concord Rd for the same entry into M4 westbound travel. In addition, a traffic study to consider possible removal of the right hand turn from Leicester Ave onto Parramatta Rd for eastbound travel as other right hand turn roads are available in the near vicinity such as Mosely St and Wentworth Rd.

The use of existing roads can be easily alleviate the congestion that currently exists on Concord Rd as the bulk of the traffic are moved onto the M4 tunnel bypassing surface roads around Concord Rd. The use of existing roads will not have any impact but rather an improvement to existing arrangement without the added cost in constructing a bridge.

### **3. MODIFY MAIN TUNNEL ROUTE TO FOLLOW PARRAMATTA RD**

In the concept design that was publicly displayed between 2013 and early 2015, the tunnel was generally following alignment of Parramatta Rd. The proposed design in the EIS is not along Parramatta Rd but rather travels north from Homebush to Concord Rd Interchange and then a direct route to Wattle St which is generally south of Parramatta Rd where it crosses Parramatta Rd once around Broughton St.

Volume 1A, section 4.3.2 of EIS indicates the advantages and disadvantages of the tunnel corridor options which are invalid and biased. The disadvantages listed for “Follow Parramatta Rd” are:

- tunnels below Parramatta Rd would restrict the depths to which buildings could be constructed, in particular basements or footings for taller buildings, and
- restrict opportunities for urban vitalisation and improved liveability along and around Parramatta Rd.

The above statements are invalid given that the tunnel can be designed at a lower depth if necessary such as the under construction NorthConnex (which generally have much lower depths, up to 90m compared to WestConnex up to 50m), and the Cross City Tunnel which was constructed with existing tall buildings and underground rail network in the Sydney CBD. Another reason for its invalidity is that the “follow Parramatta Rd” route was proposed in the preliminary concept design with Parramatta Rd Urban revitalisation in consideration. This new proposed route was only elected by the preferred Tenderer to minimise project construction cost without consideration in impact. The impacts will be significant and are:

- Vibration and noise impact during construction resulting in structural damage to many residential properties, most of which are pre-war era properties constructed with poor foundations. It also leads to many other impacts such as sleep deprivation, health issues, stress, inconvenience in the repair works, work and study issues.
- Higher number in the sub-surface acquisitions
- Energy issues relating to a longer fresh air intake tunnel from Cintra Park to the main tunnel.

Furthermore, “Follow Parramatta Rd” option could be extended on the western side of Concord Rd to minimise the impact as described above, as there is no reason whatsoever why the tunnel needs to pass under Concord Rd Interchange.

### **4. DEPTH OF TUNNEL RAMPS TOO SHALLOW**

The EIS does not detail the depth of the tunnel ramps other than indicative routes however the depth of the tunnel ramps are available on the interactive map on WestConnex website which is unknown to the public. With regard to the tunnel ramps for Concord Rd Interchange, it is unknown why there is more than 10 metres difference between the on and off ramps at Edward Street, given the two ramps are approximately of equal distance from the portal (some 350 metres away). It shows that at Edward St, the off-ramp is about 14 metres below ground level and the on-ramp is about 26 metres below ground level. The main tunnel depth in this area is about 35 metres from ground level to the top of the tunnel.

The shallow depth in the off-ramp has a major impact on the property owners located above where structural damage will inevitably occur. 14 metres is just about the length of the house frontage and is quite ridiculous given the distance from the portal. Simple trigonometry indicates that for a distance of 350 metres equating to a depth of around 14 metres is a slope of less than 3 degrees which is essentially too gentle. If the slope

was a gentle 5 degrees, the depth would be 30 metres which is closer to the distance indicated in the on-ramp. In addition, the groundwater from tunnelling will result in ground movements in the long term as the area is predominantly on clay and changes in ground water flows will cause major structural property damage. The EIS had indicated that cracks of up to 15 millimetres will affect about 100 properties as a result from groundwater, however it did not indicate the affected properties. This is unacceptable and can be avoided if the design was well thought out. The above indicative crack opening can be disputed as it is more likely to be up to 30 millimetres.

By extension, the proposed ramps are unnecessarily long (about 1 km). It was indicated that ramp grades be no more than 6 degrees to reduce air pollution. With a gentle 4 degree slope, it takes less than 600 metres. A shorter distance will affect lesser properties.

#### **5. CONCORD RD INTERCHANGE TO NOT BE A MAIN CONSTRUCTION SITE**

Concord Rd construction site is proposed to be a main construction site for the main tunnel works. Road header will be launched at this site to excavate the tunnel in both the easterly and westerly direction. The location for the other nearest tunnelling construction sites are Cintra Park and Underwood Rd.

It is proposed that Concord Rd construction site will have the most plant/equipment types used (refer to Table 6.23). As Concord Rd is now heavily congested, it will not be able to cope an additional 260 heavy vehicles and 80 light vehicles per day operating 24/7 with traffic control over the 2.5 years planned for construction. The construction site will have a high impact on the local residents. I request that the delivery of concrete and disposal of spoil not be from Concord Rd construction site but rather from the other two locations at Underwood Rd and Cintra Park, i.e. limit the tunnel construction sites to both ends and middle of tunnel as this will have lesser impact.