

Submission: WestConnex M4 East Environmental Impact Statement

As residents of Concord significantly affected by the proposed M4 East component of the WestConnex Motorway we are writing to object to the EIS proposal, express specific concerns and make suggestions about aspects of the design shown in the EIS.

1. Inadequate process and inadequate publicly released business case

The process surrounding the development of proposals for the M4 East has demonstrated a number of weaknesses that suggest that a genuine consideration of all alternative options has not been seriously undertaken and that the project, in some form, is considered a *fait accompli* by the various government authorities involved.

- The large increase in apartment construction and population has not been factored into traffic modelling. This increase is envisaged and promoted by WestConnex Delivery Authority as part of the "New Parramatta Rd Strategy".
- Awarding of tenders for construction have been made prior to public release of the full business case and prior to the public release of the EIS.
- The EIS fails to honestly and rigorously discuss all alternative options whether they be public transport alternative to a road project or public transport in conjunction with road upgrades.
- The travel time savings that are claimed by the business case summary for the completed project are at best described as modest and do not seem to be an adequate benefit for the significant cost of the project.

Assuming that the project will proceed in some form regardless of community feedback and weakness of the business case, we suggest the following.

2. Abolish Concord Rd Interchange

As was the case with the concept designs, the EIS contains numerous contradictory claims and fails to set out a justifiable case for the significant cost of constructing the Concord Rd interchange.

There is faulty logic apparent across different sections of the EIS. The preferred option for locating the western tunnel portal (option H3 with refinement H3b section 4.4.1) lists as an advantage "Grade and impacts on residential properties east of Concord Road would be minimised" (by not constructing a combined western portal and Concord Rd interchange) and lists as its only disadvantage "Assuming a Concord interchange is also provided (see section 4.4.2), there would be two interchanges within less than two kilometres" yet the design includes an interchange at Concord Rd. This choice negates one of the stated advantages of option H3 and realises the stated disadvantage of option H3. There is no justification provided for this choice of portal location while also constructing the Concord Rd interchange.

2.1 The proposed interchange is inconsistent with numerous project objectives

- Relieve road congestion – the Concord Rd, Patterson St, Parramatta Rd, Leicester Ave vicinity of the proposed interchange is already seriously congested at weekday peak times and on most Saturdays. The EIS fails to show how the situation will improve following completion of the project. It is reasonable to conclude that congestion in this area will become worse following completion.

- Enhance movements across the Parramatta Road corridor – the incremental demand that will likely be created by WestConnex will only add to the serious congestion already evident in this area further degrading north-south movement across Parramatta Rd.
- Integrate with the preceding and proposed future stages of WestConnex, without creating significant impacts on the surrounding environment – as stated above, the location of interchange at Concord Rd is considered disadvantageous to the preferred location of the western tunnel portals.
- Minimise adverse impacts at a local level on air and noise quality – there is significant potential for increased congestion and regular gridlock impacting local air quality. The proximity of the interchange to numerous residential streets will doubtless have a significant noise impact.

2.2 Access for Rhodes and Strathfield

A stated advantage of the preferred option (option C4 section 4.4.3) is that the Concord Rd interchange provides adequate transport connectivity to the key centres of Rhodes and Strathfield. We note the following.

- Rhodes has access to the M4 via, Homebush Bay Drive. This is the arterial road serving the Rhodes precinct. Concord Rd should not be utilised for carrying through traffic to & from the M4.
- The identification of Strathfield as a “key centre” requiring access to the M4 East is illogical given that it is a hub for rail & bus transport rather than private & heavy road transport. Buses require efficient access to north-south routes and to Parramatta Rd for inner west routes.
- The design does not propose any direct role for the M4 East in transport solutions for the inner west (e.g. there is no proposed access for Burwood or Kings Bay - both identified as future growth areas in the new Parramatta Rd strategy). There is no logical or justifiable case for Strathfield to be identified as a key centre for access. Inner west precincts can utilise Parramatta Rd for east-west travel.

2.3 Alternative to Concord Rd Interchange

If the Concord Rd interchange were to be abolished, freed up funds should be redirected to upgrading Homebush Bay Drive to be 3 lanes in each direction between Oulton Ave at Rhodes and Australia Ave at Sydney Olympic Park. Additionally, funds should be committed to upgrading the capacity and design of the Homebush Bay Drive / M4 interchange. This will support southbound and northbound access to the M4 for through traffic.

If the Concord Rd Interchange is retained in the design, we suggest the following adjustments to the proposed design & construction works.

3. Abolish Concord Rd southbound to M4 westbound elevated ramp

This type of elevated overpass is not seen in any other nearby precinct and would normally only be constructed in areas affording significant open space where there is no visual or noise impact on nearby residential areas (e.g. the M4 / M7 “Light Horse” interchange at Eastern Creek).

This overpass was not considered amongst the options for M4 westbound access discussed in the EIS (options OR1 to OR4 section 4.4.2) yet it forms part of the proposed design. Concord Rd southbound traffic wishing to access the M4 westbound can turn right at Parramatta Rd using the proposed double right turn bay (section 8.6.1) to proceed to the proposed Powells Creek westbound on-ramp.

The abolition of this elevated ramp and the proposed removal of the existing ramp from Concord Rd northbound to M4 westbound will permit the retention of two lanes on M4 westbound under Concord Rd.

If Concord Rd southbound to M4 westbound elevated ramp is retained in the design, we submit that the noise barrier specified (section 5.8.6 table 5.4 barrier reference NW_CONCORD_01B depicted in Fig 5.26) is insufficient and should be continued for the length of the elevated ramp (250m) over Concord Rd. This will

minimise the impact of noise generated by heavy vehicles climbing to the height of the ramp (8m) and likely using exhaust brakes on the descent to M4 westbound surface level. The design shown would generate significant noise impact for residents of apartments on the northern side of Parramatta Rd between Concord Rd and the northern rail line.

4. Lengthen proposed right turn bay from Concord Rd northbound to Patterson St

Fig 5.4 on pg 5-10 depicts a road configuration having a single northbound lane across Concord Rd bridge with a northbound tunnel exit lane joining as an added lane at Sydney St. The proposed right turn bay for Patterson St commences significantly north of Sydney St. We submit that this configuration for the right turn bay would be manifestly inadequate and will regularly cause significant queuing on Concord Rd blocking access northbound via the single lane. Current peak traffic conditions regularly result in traffic waiting to turn right into Patterson St queued to the south beyond Sydney St.

As discussed later in this submission, there may be a case for full rather than partial acquisition of the Sydney Chiel Church site to ensure that adequate space is made available for optimal lane configuration to support both tunnel ingress / egress traffic and local road north and southbound traffic movement.

5. Concord Rd not to be a main construction site for tunnelling

WestConnex Delivery Authority information session on 8 May 2015 held at Burwood RSL Club nominated Cintra Park as the mid-point from which easterly & westerly tunnelling operations would be performed. This site was nominated principally for its approximate mid-point location, its limited impact on residential properties and its direct access to Parramatta Rd for 24/7 truck movements for the removal of tunnel spoil.

Concord Rd will already be the site for significant roadway construction for the surface and sub-surface interchange. The use of Concord Rd civil site (site C5 see Fig 6.13) as a tunnelling site immediately adjacent to large numbers of residential properties is inappropriate and unjustified.

- Road headers launched to excavate main tunnels in easterly and westerly direction will generate noise and vibration
- The site is proposed to have the most plant and equipment types used (refer Table 6.23)
- Heavy vehicles will operate 24/7 with continuous movements for concrete delivery &/or removal of tunnel spoil (total 260 heavy vehicle and 80 light vehicle movements per day – refer pg. 6-49) operating over a 2 ½ year period. As stated earlier, Concord Rd at the Sydney St intersection is already heavily congested and will not be able to cope with these frequent truck movements.
- Areas NCA6 and NCA7 will be subject to noise levels for various activities that are far in excess of “moderate” noise impacts and in many cases will exceed noise management level thresholds by more than 25 dBA (refer section 10.4.1 tables 10.13 to 10.20)

Construction of the mainline tunnels in the vicinity of Concord Rd should be from the western tunnel portals at Underwood Rd and tunnelling mid-point at Cintra Park as was originally proposed in WestConnex designs.

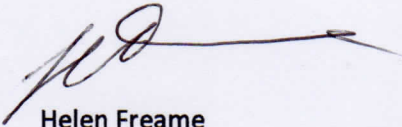
6. Additional right turn bay Parramatta Rd westbound to Concord Rd

Section 8.6.1 includes the provision of additional right turn bay on Parramatta Rd westbound at Concord Rd northbound but does not make clear whether this will be provisioned by construction works to add a lane to the westbound carriageway or by works to realign the eastbound carriageway to two lanes (following the closure of the Parramatta Rd eastbound lane for left turn onto M4 westbound) freeing up an additional lane for the right turn bay. This needs to be clearly specified in the EIS.

7. Parking restrictions in Edward St, Alexandra St and Sydney St

On Sundays there are large numbers of worshippers at the Sydney Chiel Church who park vehicles on Sydney St, Patterson St, Keppel Ave, Thornleigh Ave, Inverary St and Edward St. The current situation leads to significant danger on Edward, Sydney & Inverary streets due to cars parked both sides of the street creating a one lane thoroughfare for two way traffic.

- During construction Edward, Sydney & Inverary streets should have No Parking signposted on one side of the street with time limited parking for non-residents on the other side of the street.
- During construction time limited parking restriction for non-residents on Alexandra St could be considered although this would have limited impact on residents west of Inverary St as there is already No Parking signposted on one side of the street and unrestricted parking on the other side is often utilised on weekdays by rail commuters proceeding to Strathfield station by foot.
- Post construction, the impact of the reduction of available parking in Sydney St and Edward St for worshippers should be considered. Perhaps a full acquisition of the Sydney Chiel Church site (rather than partial acquisition) should be considered. The full acquisition of this site would create opportunities for improved noise reduction measures / green space.



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