

30 October, 2015

Attention:
Director Infrastructure Projects
Planning Services
Department of Planning and Environment
Application Number SSI 6307
GPO Box 39
Sydney NSW 2001

Dear Sir / Madam,

Re: Submission in Response to M4 East EIS

I would hereby like to register my **vehement and unequivocal objection to the current M4 East Tunnel Project proposal**.

To be clear, I do not object to the overall goal of finding a solution to existing and future traffic problems in Sydney's Inner West and was generally supportive of the concept of building a tunnel under Parramatta Road. However, I do object to the process that has to date been followed (see below) and importantly, object to the assertions made in, and conclusions drawn from, the EIS, as noted below.

PROCESS

I find it astonishing and incredulous that the Government has simply accepted the conclusions of the EIS and entered into construction contracts, prior to releasing the EIS to the wider community and allowing for response and consultation, prior to putting forward a complete business case and prior to obtaining planning approval. Despite this, I submit that planning approval should **not** be forthcoming simply because such contracts have already been signed.

ASSERTIONS & CONCLUSIONS OF EIS

Suitability of Tunnel Options Based on Geotechnical Studies

The main reason cited for the choice of current route was that geotechnical studies indicate it as the most suitable for tunnelling. In fact, comparison of the routes in the EIS does not indicate any problems with ground conditions if following Parramatta Road, as per the original concept. Clearly, then, other factors have come into the equation for assessment of suitability of routes. This is evident in the EIS, which notes that the advantages of tunnelling South of Parramatta Road are that:

1. Tunnels would be shorter, which would reduce construction costs; and

2. 'Tunnels would only cross beneath Parramatta Road for a short distance, preserving the majority of the corridor for future urban renewal'. This second point is particularly poignant, as it goes to the heart of the decision to choose the current route. As tunnelling under Parramatta Road 'would restrict the depths to which buildings could be constructed, in particular basements or footings for taller buildings', such a route would effectively reduce the opportunities and profitability for developers!

Whilst minimisation of project costs is desirable, costs do also include social, economic and health of costs to members of the community (see below), in particular those in the community most affected, local residents. I submit that these costs outweigh reduced construction costs (as per point 1, above) and should certainly be put before the interests of developers.

Social and Economic Impact of Project

Whilst the EIS identifies a significant benefit to the local, regional and state economies over the three-year construction period, it neglects the financial impact on home-owners above or near the proposed tunnel, who will see the values of their homes reduce, due to the proximity to the tunnel, both during and after construction.

It also neglects the highly detrimental social impact on residents living in the affected suburbs, particularly those flowing from noise and vibration (see below) and associated stress.

The benefits identified could be enjoyed by the **whole** community if the project did not significantly impact local residents economically, socially and psychologically. Further, future benefits of urban renewal along the Parramatta Road corridor would still be possible without the need for kilometre after kilometre of high-rise buildings.

Noise and Vibration

The EIS makes a number of assertions in relation to noise and vibration, which are fallacious, misleading or simply unacceptable. These are as follows:

1. *There are relatively high levels of existing road traffic noise and the impact of tunnelling works has been assessed in that context.* I note that my residence is directly above the proposed route and around 100 metres from Parramatta Road and I do not consider existing road traffic noise to be significant at any time of the day;
2. *A noise and vibration assessment that was carried out predicted 'In terms of human comfort', a low risk of annoyance as a result of tunnelling works.* This is despite identifying that noise would exceed acceptable noise levels both during and after work hours, would be 24 hours a day and have potential for ground-borne noise. As my residence is directly above the proposed route, I am very likely to be highly affected. In particular, I find it unacceptable that this would impact on my ability to sleep. These circumstances do not translate into a 'low risk of annoyance';

3. *Up to 203 residential and light commercial buildings would be within the safe working distances for risk of cosmetic damage from vibration and vibration impacts will be mitigated through the implementation of appropriate mitigation measures.* Without knowledge of the so-called 'appropriate mitigation measures' it is simply not possible to determine whether damage will or will not occur. Even rectification of any damage comes at a cost, in terms of inconvenience, stress, administration and time. It is misleading and unacceptable to simply dismiss or gloss over this issue.

CONCLUSION

The initial impetus and sole reason for contemplating an extension of the M4 (M4 East) was to provide a solution to current and future traffic problems for Sydney's Inner West. **The best outcome is to provide a solution that comes at an overall minimum cost to the community**, in particular, to the community most directly affected, local residents. This outcome is not achieved when developers are favoured over local residents - when greater benefits are derived by developers and social, financial and health costs are increased for local residents. This outcome is not achieved simply by minimising the pure financial costs of construction. This outcome is not achieved by maximising the height of buildings along the whole of the Parramatta Road corridor in order to fit as many people into new unit blocks as possible.

The above noted outcome is achieved when the solution to traffic problems is balanced with social, economic and health considerations of existing residents and with the opportunity for reasonable development along Parramatta Road, without excessively high buildings. The outcome is achieved by reverting to the original proposal to construct the tunnel under Parramatta Road.

I look forward to your favourable response.

Yours Sincerely,