

Director Infrastructure Projects
 Department of Planning and Environment
 Application Number: SSI 13_6136
 Major Projects Assessment
 GPO Box 39
 SYDNEY NSW 20001

10 September 2014

Dear Sir/Madam

Re: NorthConnex (M2-M1 Connection) Project - Application No: SSI 13_6136

Reference is made to the Environmental Impact Statement (EIS) currently on display for the above project. At the outset, we should like to make it clear that we do not object to the proposed project in principal and in fact welcome some action being taken on address the issue of Pennant Hills Road however, as residents who will suffer significant negative impact from the project in its proposed form, we would like to make the following submission regarding information contained in the EIS. Some of the points below relate to a need for further information or clarification on contradictory information contained within the EIS. Some points are matters of objection. In either instance and where relevant, proposed actions or details of further information to be provided have been included at the end of the section (appear in blue type for clarity).

A. Traffic

During Construction;

1. Operation of main entry to southern interchange compound via residential streets 24/7;

1.1 Not in keeping with stated objective of '*...identifying construction traffic routes ... to utilise the motorway and arterial road network... thereby reducing traffic related impacts on local roads.*'

1.2 Other compounds gain access/egress via Pennant Hills Rd, why not this one?

Proposed Action: Deletion of the proposed vehicle entry way via Eaton Rd and have all construction vehicles enter and exit the site via Pennant Hills Rd, 24/7, for the duration of the works.

2. Inappropriate traffic flow pattern given intersections are currently at capacity;

2.1 Vehicles turning right from Karloon Rd into Eaton Rd will have to line up causing additional delays to the already extensive ones for traffic coming up Karloon Rd.

2.2 Vehicles turning right from Eaton Rd into Eaton Rd, to connect with Pennant Hills Rd, will have to line up along Eaton Rd causing traffic congestion to an already difficult intersection. Note to that these vehicles have to give way to not only the traffic moving east from Karloon Rd too Eaton Rd but also to those vehicles lined up to turn south into Eaton Rd. The additional congestion means that residents will not be able to get out of their own street, they will have to take significant detours just to access Pennant Hills Rd. Considering the highly restrictive nature of entering our area, particularly when coming from the north, this is unreasonable.

2.3 Vehicles turning left into Eaton Rd from Pennant Hills Rd and then left again into Eaton Rd and then the compound entry will cause 'knock on' delays to traffic trying to move along Pennant Hills Rd or enter Eaton Rd. The size of the vehicles involved and topography of the road requires a slow speed to negotiate these corners safely, this will further reduce the speed of traffic flow in the left hand lane of Pennant Hills Rd.

Proposed Action: Preparation of a comprehensive traffic study which investigates the existing traffic conditions at the intersection of Karloon/Eaton/Pennant Hills Rd and factors in the proposed construction related vehicular movements. Deletion of the proposed vehicle entry way via Eaton Rd and have all construction vehicles enter and exit the site via Pennant Hills Rd, 24/7, for the duration of the works. The traffic study and access/egress alterations made prior to consent being granted.

2.4 Table7-40:OpTT1 states that a road safety audit has to be carried out. If there has been no safety audit how can the proposed traffic arrangements be declared the most appropriate? Safety for all road users should be a primary consideration.

Proposed Action: Preparation of a comprehensive traffic study which investigates the existing traffic conditions at the intersection of Karloon/Eaton/Pennant Hills Rd and factors in the proposed construction related vehicular movements. Deletion of the proposed vehicle entry way via Eaton Rd and have all construction vehicles enter and exit the site via Pennant Hills Rd, 24/7, for the duration of the works. The traffic study and access/egress alterations made prior to consent being granted.

3. Section 7.1, p.341 states workers will be bussed into construction sites from Pioneer Ave depot. This was also stated at the community meetings;

3.1 So why is there a 50 space parking area in the southern interchange compound? Who would be parking there and why so large if workers are being bussed in? Additional traffic to local roads.

Proposed Action: Further information to be supplied to explain the size and capacity of this car parking area, its intended use pattern, hours of operation and any other relevant information so that residents can comment on any potential impact of the proposal. This information should be supplied prior to consent being granted.

4. Bus stops located in Eaton Rd, one on the northern side the other on the southern, between Karloon Rd and Pennant Hills Rd.

4.1 There is no mention within the EIS of what is proposed for these bus stops. Retention of these with the addition of the truck movements would create gridlock at the intersection of Karloon/Eaton/Pennant Hills Rd during peak periods.

4.2 Removal of the bus stops however, would severely limit residents access to an already limited public transport system.

4.3 Additional construction related traffic in area will make crossing Eaton Rd or Karloon Rd even more dangerous than it already is.

Proposed Action: Prepare a safety audit of the intersection of Karloon/Eaton/Pennant Hills Roads and factor in the proposed vehicular movements. Further information to be provided on any intended closure or retention of these bus stops so that residents can comment on the impact of the proposal. This report should be completed and released prior to consent being granted.

5. Statement that ‘...anticipated average traffic volumes may be exceeded...’ (Appendix E:Technical Working Paper – Traffic and Transport, p.153)

5.1 No details regarding when, how often or for how long these ‘...anticipated’ averages would be exceeded so there is no way of knowing the potential impact of them on local residents. With no such information available, these impacts have been omitted from the EIS making the stated conclusions on traffic inaccurate.

Proposed Action: Further information to be supplied on at what stages of construction any ‘anticipated’ volume may be exceeded, how often these are predicted to occur and for how long they may operate so that residents can comment on their potential impact. This traffic study should be completed and released prior to consent being granted.

6. Statement that the road limits which exist on the local roads do not apply is incorrect. (Appendix E:Technical Working Paper – Traffic and Transport, p.153)

6.1 Exemptions from load limits for roads only apply where there is no other alternative route to access the site to which the vehicle is going. This is confirmed within the Working Paper itself. To state that there is no other way of accessing the Southern Interchange Compound other than via Karloon/Eaton Rds is incorrect and misleading.

Proposed Action: Retraction of an incorrect and misleading statement. Investigation of alternative routes and deletion of the proposed vehicle entry way via Eaton Rd. This should be completed prior to consent being granted.

During Operation;

7. Traffic impact assessment contained in the EIS is inadequate and misleading;

7.1 Traffic modelling used for the operational stage of the project only considers data from and the impact on Pennant Hills Rd. It does not address the issue of the two (2) entries to the Southern Interchange Site proposed for Eaton Rd. No assessment of the impact of these vehicles on the local road system has been undertaken. Traffic associated with the site is anticipated to include, but not limited to, staff, maintenance, delivery, emergency and garbage collection vehicles.

Proposed Action: Preparation of a comprehensive traffic study which investigates the existing traffic conditions at the intersection of Karloon/Eaton/Pennant Hills Rd and factors in the proposed construction related vehicular movements. This traffic study should be completed and released to residents for comment prior to consent being granted.

8. Failure to comply with stated aims of project in regard to traffic;

8.1 Appendix E: Technical Working Paper – Traffic and Transport, p.210 lists a stated aim of the project is to ‘maintain existing road characteristic and environment especially residential streets...’ and Section 7.5.2, p.586 ‘Maintain existing neighbourhood connectivity and local access for local traffic’. These objectives have been totally ignored during planning for both the construction and operational phases of the project and particularly in regard to Karloon and Eaton Roads.

Proposed Action: Deletion of the proposed vehicle entry way via Eaton Rd and have all construction vehicles enter and exit the site via Pennant Hills Rd, 24/7, for the duration of the works.

9. Proposed widening of Eaton Road.

9.1 In Chapter 1, Section 1.1 there is a cursory mention of widening of Eaton Road. This appears to be the only mention of this proposed work within the EIS. No details regarding the extent or design of the works, the proposed location or the hours when this work is proposed to occur. As this document, according to its name, is to state the environmental impacts of the proposed project, why has this matter not been expanded upon and all relevant implications, such as noise, vibration, traffic disruption, impact on adjoining properties etc, been detailed in the report?

Proposed Action: Details regarding the exact nature of these proposed works should be made public and open to comment by impacted residents prior to consent being granted.

B. Noise and Vibration

During Construction;

10. Operation of entry to Southern Interchange Compound via Eaton Rd 24/7;

9.1 Contradictory statements throughout EIS on hours of operation for entry from Eaton Rd but most agree it will be 24/7 (Refer examples Table 7-42, Section 7.1 p.335 and p.40, Appendix E:Technical Working Paper-Traffic and Transport p127).

9.2 Use of the entry by construction vehicles will create additional noise and vibration to dwellings. This is unreasonable given there is an alternative entry point available which would have minimal impact on residential properties.

9.3 It is unreasonable to expect residents to endure an additional four (4) years of construction noise when we have already put up with years of 24/7 construction work on the M2 (yes – we can most definitely hear it from our property).

9.4 With a stated aim of using the existing arterial roads, why is the entry not from Pennant Hills Rd as is the case with the majority of other construction compounds?

Proposed Action: Deletion of the proposed vehicle entry way via Eaton Rd and have all construction vehicles enter and exit the site via Pennant Hills Rd, 24/7, for the duration of the works. At property treatments (eg. double glazing) to mitigate noise infiltration to dwellings.

11. Cumulative impact of works proposed on the M2;

10.1 The cumulative impacts of the traffic/construction work along Eaton Rd and that on the M2, which also impacts our property and others, has not been considered. With works on the M2 to again go 24/7 along with the works within the Southern Interchange Compound and the associated traffic, this will have a significant negative effect by giving us no respite from construction noise either by time or location.

Proposed Action: Deletion of the proposed vehicle entry way via Eaton Rd and have all construction vehicles enter and exit the site via Pennant Hills Rd, 24/7, for the duration of the works. At property treatments (eg. double glazing) to mitigate noise infiltration to dwellings. Installation of continuous noise barriers to the western boundary, Eaton Rd (north-south) frontage of the site.

12. Lack of consideration of topography of area in relation to proposed vehicle movements;

11.1 It is proposed to have large, truck and dogs coming up a very steep incline at Karloon Rd. This will create not only additional noise, associated with more stress on their motors, but also expel additional pollution as they are forced to change gear. No

consideration or mention of this occurs in the EIS. Local residents will have to endure these impacts for a period of 4 years minimum.

11.2 With the advent of the operational stage of the site, and given that the main entry to the Southern Interchange Complex will be via Eaton Rd, the same scenario exists with large vehicles having to climb a steep hill expelling large amounts of pollutants as well as noise.

Proposed Action: Deletion of the proposed vehicle entry way via Eaton Rd and have all construction vehicles enter and exit the site via Pennant Hills Rd, 24/7, for the duration of the works. At property treatments (eg. double glazing) to mitigate noise infiltration to dwellings.

13. Noise level data and sleep disturbance calculations inadequate and misleading;

12.1 Data used to determine additional levels of noise associated with the Southern Interchange Compound and associated sleep disturbance calculations have only used data pertaining to traffic on Pennant Hills Rd. They did not include projections associated with the additional construction traffic along Eaton Rd nor the noise from construction works on the M2 which also affects our environment.

12.2 Noise study only dealt with noise emitted from the site during construction, there is no examination of the noise created during the operation phase of the complex. Presuming that the site is in keeping with most such sites, noise will be emitted by air conditioning systems, vehicles moving about the site as well as entering and leaving, there will be noise associated with the maintenance of vehicles and plant, staff noise with voices, mobile phones etc. All of this has been totally ignored in the EIS indicating that the study is inadequate and not representative of the true impacts of the development on a residential area.

Proposed Action: Deletion of the proposed vehicle entry way via Eaton Rd and have all construction vehicles enter and exit the site via Pennant Hills Rd, 24/7, for the duration of the works. At property treatments (eg. double glazing) to mitigate noise infiltration to dwellings. Installation of continuous noise barriers to the western boundary, Eaton Rd (north-south) frontage of the site.

14. No noise mitigation measures for properties in Eaton Rd.

13.1 During the course of construction, it will be necessary to demolish the existing dwellings and brick fences along Pennant Hills Rd. This will increase the noise filtering through to properties in Eaton Rd. Details contained in the EIS indicate that there will be hoardings placed along Eaton Rd, from Pennant Hills Rd but, due to configuration of the site and the presence of the main construction vehicle entry point in Eaton Rd, it will not be possible to install any form of hoarding, let alone sound barriers, to mitigate construction noise emanating from the site or from Pennant Hills Rd and affecting

Eaton Rd residents. This factor has not be considered in the noise evaluation undertaken as part of the EIS.

Proposed Action: Deletion of the proposed vehicle entry way via Eaton Rd and have all construction vehicles enter and exit the site via Pennant Hills Rd, 24/7, for the duration of the works. At property treatments (eg. double glazing) to mitigate noise infiltration to dwellings. Installation of continuous noise barriers to the western boundary of the proposed construction site.

C. Urban Design, Landscape Character and Visual Amenity

15. Light pollution;

14.1 During both the construction phase and operational phase the Southern Interchange Compound will operate 24/7. This will require lighting throughout the night. There will be no period from the commencement of construction when our property will not be impacted by light spill from the site. The level of impact may alter between the two (2) phases. Discussions on this subject within the EIS are irrelevant and ridiculous given that it admits that there has been no existing light measurement, so there is no bench mark to compare data with, and there is no lighting plan, for either the construction or operation phase, in existence. This means that there is no scrutiny of the proposed lighting and no opportunity for those most affected by it to comment.

14.2 In addition to the stagnant lighting of the actual site during both construction and operational phases, the EIS does not mention or account for the impact of vehicle lights entering and exiting the site. With the main entry to the site during construction being location immediately opposite our property, and a bedroom window being located at that exact point, every vehicle leaving the site will shine their lights into that bedroom and the front of our residence. Additionally, when the property moves to the operational phase, there is a main vehicular entry directly opposite our property again. This means that once more we will be subject to continuous light pollution from vehicles exiting the site 24 hours per day, 7 days a week in perpetuity. This is unacceptable and needs to be mitigated.

Proposed Action: Deletion of the proposed vehicle entry way via Eaton Rd and have all construction vehicles enter and exit the site via Pennant Hills Rd, 24/7, for the duration of the works. At property treatments (eg. exterior shutters) to mitigate light pollution into dwellings.

16. Section 8.1-Land use and property, p.949 states that there will be impacts on overhead powerlines at Eaton Rd, telecommunications infrastructure on the west side of Pennant Hills Rd and traffic lights at Pennant Hills Rd/Copeland (Eaton) Rd intersection.

15.1 What are these impacts? Do you mean that there will be disruption to services? If so, what arrangements are to be made for affected residents? From a purely practical perspective, I care for an elderly person with multiple life threatening health conditions that required electricity and telephone services for safety reasons. Apart from this, I operate a home industry (to facilitate my care of the elderly person) and loss of electricity and/or telephone would negatively impact on my business.

Proposed Action: Further information to be provided to residents on what these impacts will be and their implications for residents. Preparation, and implementation, of a mutually agreeable notification process, including minimum notification period, for upcoming disruptions to service. This information and agreement should be finalised with residents prior to consent being granted.

17. Overshadowing of property;

16.1 Section 7.5-Urban design, landscape character and visual amenity (p.659) states that there will be overshadowing of the adjacent properties in winter however, the shadow diagram (M1-M2-5000-DR-UD-0903) shows no such overshadowing. Further, examination of this shadow diagram shows that it has been prepared for the wrong date and is inaccurate. Shadow diagrams are normally prepared for 9am, 12 noon and 3pm on 21 December and 21 June. No diagram for 21 December has been provided. Diagrams for 21 March and 21 September, the autumn and spring equinoxes, are generally only required where there is to be substantial overshadowing or the overshadowing does not comply with the consent authorities guidelines. The supplied shadow diagram is also incorrect. The site has a directly east-west orientation. With the sun rising in the east, moving through an arc to the north, and setting in the west, it is almost impossible for shadows to be cast to the north at midday as indicated on the supplied plans. Additionally, examination of the shadows which occur on the underlying aerial photograph clearly show no correlation to the shadows predicted by the diagram. Regardless of at what time of day or what season the aerial photograph was taken, there should be some correlation to the predicted shadows in at least one of the 3 supplied diagrams.

16.2 Shadow diagrams for the proposed temporary structures to be on the site during the construction phase have not been provided. The existing structures to be demolished currently consist of largely of single storey residential buildings. During the construction phase, the site is proposed to 'temporarily' contain an acoustic shed, some 17metres in height, and a two (2) storey office building. Considering it is intended for this phase to continue for approximately 4 years and the overall bulk and scale of the proposed 'temporary' structures, it is reasonable to expect that shadow diagrams would be produced to assess the impact of these on the solar access of the properties immediately adjacent to the site.

Proposed Action: Preparation of shadow diagrams for 21/12 and 21/6) which accurately plot the shadows of both the 'temporary' construction buildings and the final operational buildings. These diagrams should be provided to residents for their comment prior to consent being granted.

18. Landscaping;

17.1 Section 7.5, Table 7-140, p.660 states that views to the proposed southern control centre would be mitigated over time as the landscape matures. This, of course, presumes that there is any landscaping between the residences and the building which, there largely won't be. With the Eaton Rd frontage being broken by at least two (2) commercial width driveways the continuity, and therefore effectiveness of any proposed 'landscape buffer zone' is lost. Further, the rudimentary landscape plan (M1-M2-5000-DR-UD-0712) included in the EIS does not indicate any shrubs or grasses to be planted along the north-south section of Eaton Rd. This is supported by the artists impression of the site clearly showing that the predominance of 'landscape buffering' occurs along Pennant Hills Rd and down the east-west running section of Eaton Rd.

17.2 *'The urban design of the project would comprise a suite of architectural and landscape components, designed to provide a refined and integrated edge to the residential perimeter.'* This objective has been totally ignored. There is no attempt to design either the building or the landscape to represent anything other than a dominant, industrial building. With architecture that is purely industrial, comprising a metal and glass monolith without character or soul, and a generic landscape, which fails to address any sense of genius loci, the end result is not only boring but offensive to those that will have to suffer it looming over them in years to come.



Figure 1 (Above): Existing view (looking south-east) of the intersection of Eaton Rd (east-west) and Eaton Rd (north-south). Note the existing trees and the two (2) storey house that is almost hidden by mature gardens?



Figure 2 (Above): "Artists Impression" of the same view post construction. Note the lack of landscaping (consistent with the landscape plant) along Eaton Rd (north-south), marked with yellow arrow, and the overall dominating bulk and scale of the building. Where has there been any attempt to minimise the imposing nature of this building?

17.3 Section 7.5, No.V11, p.707 states that *'opportunities would be investigated to flatten landscape batters at the operational ancillary facilities to maximise plant response and maintainability.'* This is just nonsensical. Anyone with an ounce of design knowledge knows that the use of earth mounds is an efficient and cost effective way to deal with traffic noise. Whilst flattening of the site during construction may be appropriate, it would seem more logical and reasonable to use earth mounding along the Eaton Rd frontages to reduce the visual impact of the site whilst simultaneously addressing some of the noise and light pollution issues that will be created at the operational phase.

17.4 The plant selection identified in the landscape plan is highly generic and pays little heed to what is appropriate for the climatic or environmental conditions of the site and almost none to the genius loci. Although Sydney Blue Gums (*Eucalyptus saligna*), a locally indigenous species, have been selected as the primary screening tree, their proposed planting arrangement is unsuitable for the species or the location. Given the exposed nature of the site and the extreme winds that occur periodically, planting of isolated specimens of this tree is a recipe for failure. The species is a forest tree and is most suited to be grown in groupings. Isolated specimens are prone to branch failures and even whole tree failure, particularly when exposed to the winds which occasion this area. Under no circumstances would I, as a qualified Consultant Arborist, endorse the proposed planting.

17.5 At no point in the EIS is any form of ongoing or sustained maintenance of the proposed landscaping discussed. There is but one, general statement that it is to be maintained but no indications of by whom or for how long. Whilst this may seem a trivial matter, when the landscaping is being touted as the primary integration tool between an industrial building and the surrounding residential area, the maintenance and appropriate care of it to ensure it not only survives but grows to potential is extremely important. Certainly the track record of such environments is that they become repositories for rubbish, weeds and dead plants and that the trees fail to thrive through lack of care or inappropriate treatments by unqualified personnel. We do not think that it is unreasonable that any proposed landscape should be cared for and maintained to the best possible quality and condition as it will be something that residents look at every day for many years to come. This is particularly true when you make a study of similar such projects, particularly those operated by Transurban, their track record in this area is less than inspiring or confidence building.

Proposed Action: Redesign of the façades of the Southern Control Centre building to be more sympathetic to the residential nature of the surrounding environment – perhaps locating the 'basement car parking' below ground to reduce the bulk and scale of the building, articulate the façades, use alternative materials to industrial glass and steel. Redesign the landscaping to better integrate with the local environment, provide a visual buffer between the residential properties and the industrial site and to address some of the negative impacts on the local residents (ie. earth mounding, multi-layered plantings etc). Prepare and implement a maintenance program for the landscaping including requirements for appropriately qualified personnel to carry out such maintenance (ie. horticulturalist for gardens, Arborist for trees) and detailing a minimum period (recommended to be not less than 10 years) for

maintenance to be continued to allow plants and trees to attain maximum potential. These alterations and documentation should be prepared and made available for public comment prior to consent being granted.

On a personal note, from someone who regularly deals with reports, including legal documentation, and who has a background in planning and development, this EIS is an extremely poor document. It contains numerous inconsistencies and inaccuracies, it uses inappropriate data sets, fails to address numerous key issues and has a large number of editing errors, including the omission of key figures and information. In addition, the layout is extremely confusing and requires constant cross referencing, often to multiple sections, which, given that it is published on the internet and is such a large document, is confusing, frustrating and not at all user friendly. As the EIS is legally required to form part of the public exhibition documentation, would it not seem appropriate to ensure that it was organised and written in a way that was user friendly to the single largest component of its audience, the general public? Further, would it not seem reasonable to expect that it was designed to inform those that would be primarily impacted by the proposed development, particularly given that it is such a complex project? Perhaps if a little more care had been taken with the production of the EIS, there may be a little less angst and opposition in the community.

We would like to take this opportunity to thank you for your time and consideration of the matters we have raised. We look forward to having the undisclosed matters detailed, requested information made public and inaccuracies of the EIS corrected.