

21 May 2012

Major Projects Assessment,  
Department of Planning and Infrastructure,  
GPO Box 39, SYDNEY, NSW 2001  
[plan\\_comment@planning.nsw.gov.au](mailto:plan_comment@planning.nsw.gov.au)

Attention: Director, Infrastructure Projects

Dear Sir/Madam

**North West Rail Link (SSI-5100)**  
**Submission on behalf of Inala – Cnr Franklin Road and Castle Hill Road, Cherrybrook**

We act for Inala; an organisation that provides support for adults with intellectual disabilities. Inala has two separate sites located on Franklin Road, namely: '*Inala - Residential and Administration (Inala)*'; and '*Inala Dulkara Adult Day Service (Dulkara)*'.

**1. Background**

**Inala** is known as Lot 7 DP 511824, Nos.160-168 Castle Hill Road, Cherrybrook (corner Franklin Road) and is located directly opposite the proposed North West Rail Link Site 4 – Cherrybrook Station. It provides 24 hour residential accommodation for people with disabilities in a number of freestanding residential buildings. This facility operates 365 days a year, 24 hours a day.

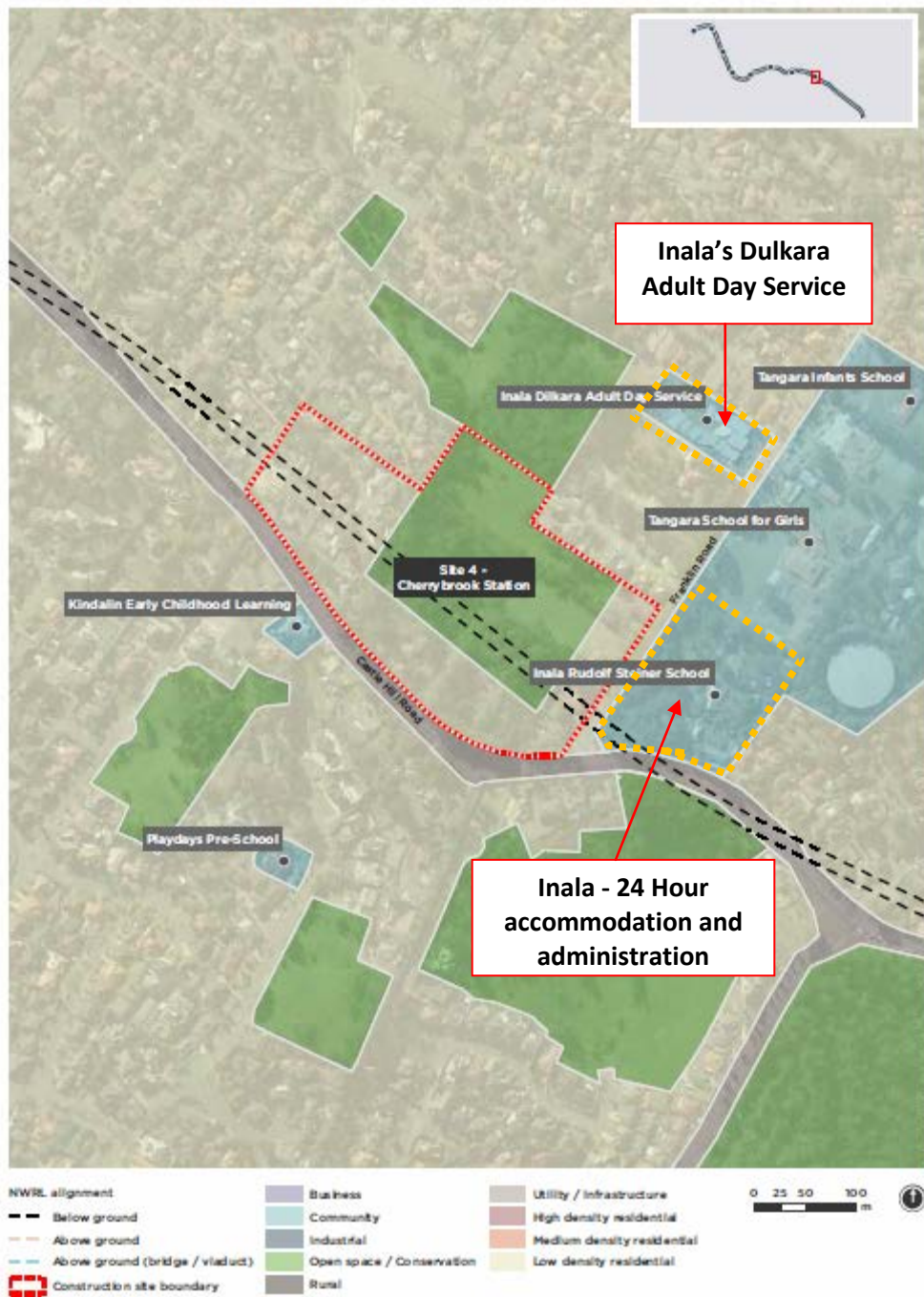
**Dulkara** is known as Lot 12 DP 16975, No.118 Franklin Road, Cherrybrook and is located opposite Tangara School, within close proximity of the proposed North West Rail Link Site 4 – Cherrybrook Station. It provides a range of day services for people with disabilities over 18 years of age. Inala's Day Services operate 5 days a week, 48 weeks a year.

The location of these facilities is shown in the following diagram (Extract from EIS).

Further to our recent meeting on 19<sup>th</sup> April 2012 with Cecilia Densham and other representatives and following a review of the Environmental Impact Statement on exhibition (Environmental Impact Statement Stage 1-Major Civil Construction Works) we provide a number of comments for the Department's consideration.

We confirm that our clients' primary aim is to protect the health and wellbeing of its clients (both resident and non-resident) and staff; maintain the operational capability of Inala services; and ensure that the construction phase of the Northwest Rail Link will be managed in a manner to allow the Inala services to operate with minimum disruption during the lengthy construction period.

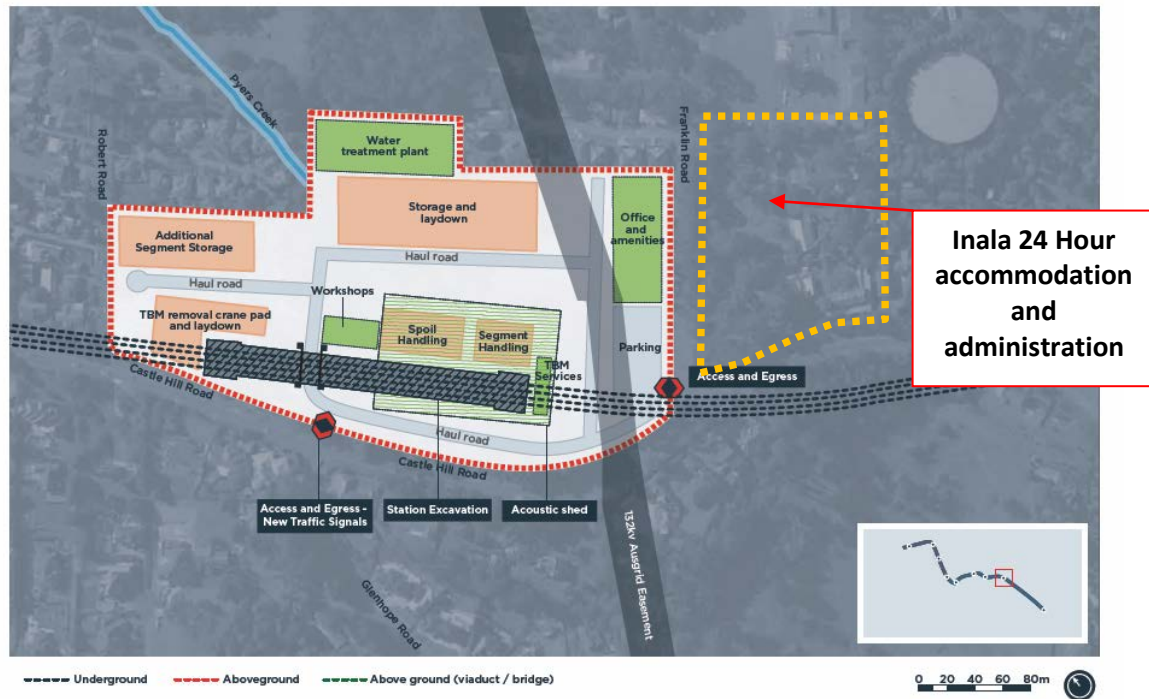
Figure 14.3 Land use and community facilities – Cherrybrook station site



Extract: Environmental Impact Statement Stage 1-Major Civil Construction Works (Chapter 14 Land Use and Community Facilities - Figure 14.3).

Figure 7.15 Cherrybrook Station Site Layout

Details shown are indicative only. Final layouts to be determined by the construction contractor(s)



Extract: Cherrybrook Station Site Layout (Chapter 7 Project Description - Figure 7.15).

The Environmental Impact Statement Stage 1 - Major Civil Construction Works (the **EIS**) for the Northwest Rail Link (currently on exhibition) identifies a proposed station (Site 4 - Cherrybrook Station) in close proximity to both of Inala's sites. As this has the potential to cause conflicts with both of the existing Inala services, we have provided a number of comments in regard to the operation of the service, outlined a number of concerns, and proposed management measures for consideration by the Department of Planning and Infrastructure.

## 2. Site Operations – Inala

Inala serves a variety of functions as follows:

**Accommodation** - Residential services for 23 clients in four (4) different units and ancillary services for these clients are located here. These are 24 hour a day/7day a week services. Given the 'residential nature' of the facility the hours between 9am and 3pm Monday to Friday are considered to be the "off-peak" times.

**Administration** - The Organisation's main Administration block is located on this site. The operating hours are 8.00am to 6.00pm Monday to Saturday.

**Maintenance** - The Organisation's maintenance department is located on this site. The operating hours are 7.00am to 4.00pm Monday to Friday.

**Community Group Homes Administration** - Inala runs several Community Group Homes and even though they are not located on this site, administrative/management support is. Therefore, Group Home clients and staff come to administration for a variety of services each week. They also pick up any deliveries and mail for their clients' from this office. The number of visits to this office each week is unpredictable but frequent.

**Community Groups** – a number of community groups utilise the site facilities. There are regular bookings three (3) evenings per week between 6.30/7.00pm and 10.00pm and there is a community pre-school which uses the facilities from 9.00am to 12.30pm four (4) days a week.

### **3. Site Operations - Dulkara**

The Inala Adult Dulkara Day Service is located approximately 100metres to the north of the northern boundary of the Cherrybrook Station construction site, opposite the Tangara School.

It provides day support for up to 58 clients who have an intellectual disability and operates Monday to Friday from 8.30am - 5.00pm with its peak client arrival times being between 8.45am - 9.15am and departures between 2.45pm -3.30pm. Lunch breaks and morning tea breaks are spent within the outdoor areas of the property. This service also runs programmes in the community and therefore there are vehicle movements in and out of this site throughout the day.

### **4. Vehicular and Pedestrian Access to Inala**

There are two driveways for the Inala Site; known as Gate 1 and Gate 2 however there is no internal access between these two gates. Gate 1 is of particular concern as it is directly opposite the proposed works site and is the only access to the main carpark.

The Inala site also receives deliveries throughout the week for kitchen, laundry and administration at random times but these would be predominately between 7.30am and 4.00pm. Out of hours services such as garbage and recycling collection occurs on regular days.

### **5. Impact upon Residents who Reside at Inala**

It is foreseen that 20 out of the 23 clients will predominantly be affected by noise, dust, fumes, vibration and truck movements and their pedestrian safety may be of a concern if the volume of traffic in Franklin Road increases. This may also have an effect on staffs' ability to access and exit this site (this is predominantly through Gate 2).

Our major concern is for our Group Home known as 'Karimi'. This house is located directly adjacent to the construction site. This group home provides services for three (3) clients with intellectual disabilities that are also ageing and who need clinical support and ongoing monitoring from both a psychiatrist and clinical psychologist. Refer Attached correspondence from Quovus, dated 2<sup>nd</sup> May 2012.

These clients require consistent staff management and support for their safety and well-being. The nature of the organisation's role in providing for persons with an intellectual disability brings along a set of unusual issues that must be addressed in the construction phase.

- **Behavioural Issues** - some of the behavioural issues that need to be managed in this house include:
  - General safety - as none of the clients that live here are able to identify and manage any community risk.
  - Road Safety - they do not have any road safety skills nor are they able to be educated in these.
  - Curiosity - the clients here have a particular interest in what is going on in their environment and would be attracted to truck movements, noise and the general activity generated with such an undertaking. It will be necessary to ensure that these clients be isolated as much as possible from the construction activities; therefore significant hoarding would be a requirement.

This hoarding in itself will attract attention but if it is designed in a way that the clients are not aware of ongoing works, over time once the clients become used to the hoarding and see it as part of the environment, it may potentially lose its attraction.

- **Sleep Patterns** - a further concern for Karimi is one of adequate nightly sleep. Sleep is considered an important component in the maintenance of mental health, behaviour support and general well-being of the men who occupy Karimi.
- **Night Time Staffing** - the house is staffed on a "sleep over" model which means that from 10.00pm to 6.00am Monday to Friday and 10.00pm to 7.00am Saturday and Sunday the staff member rostered to this house is asleep and is required for an emergency only. The proposed overnight work is also envisaged on having a negative impact on the Karimi staff member getting a satisfactory night's sleep, hence increasing risks for the ongoing care and support of the men in Karimi and the likelihood of higher staff costs if 'awake' staffing is required.
- **Nature of the Staff Rostering** - because of the way the Karimi staff roster is structured (i.e. sleepover model) is that if the clients are disturbed over-night and attracted to the construction site, they could potentially leave the building and access the construction area. This would put them at significant risk and even though the staff would respond, the response time would be slower as they are in bed and reliant on the clients making enough noise to wake them up. If the staff member had to attend to one person who had gone outside this would pose an increased risk to the other two men who would be left unattended.
- **Importance of Weekends** - weekends would be another area of increased risk to the Karimi residents. These clients like to spend time outside in the Inala grounds or sitting in the outside areas of the house (their backyard). With the increase in noise and dust and construction right outside their door this will limit these activities.

This is likely to unsettle the residents of Karimi. This house is structured in a way that facilitates these clients' needs and likes and these "at home" activities are very important as there are already limitations on community based activities that they can participate in or cope with.

## **6. Overall Concerns for Inala Operations**

It is evident from the issues raised in this submission the successful management of clients of both Inala and Dulkara relies on the consistency of routines provided throughout the day and dependable operation of the site.

Disturbance or variation to everyday timetables can severely interfere with the successful operation of both facilities and has the ability to impact on the provision of quality care to both permanent long term and short term clients.

## **7. Review of EIS Documentation**

The proposed construction phase lasts for approximately 42 months (3 ½ years) (*EIS – Chapter 14 Land Use and Community Facilities*) and therefore has the ability to inflict significant long term impacts on the functioning of Inala and Dulkara.

These impacts are described as 'reduced amenity' within the EIS and are further identified within the Traffic, Noise and Vibration and Air Quality chapters (Chapters 9, 10 and 19) of the EIS. Specific concerns in relation to these matters have been outlined below.

### **a. Noise and Traffic**

The noise and traffic impacts are associated with construction works at Cherrybrook Station. Inala is located directly opposite the construction site for Cherrybrook Station (on the corner of Franklin Road and Castle Hill Road). The construction works involve spoil removal activities and associated truck movements over a 24 hour operation/ 7 days per week and an access and egress point (traffic lights) immediately adjacent the Inala site. The majority of truck movements are anticipated between the hours of 7am to 6pm and involve truck-and-dog or semi-trailer tippers able to carry 12.5m<sup>3</sup>. The technical paper (*Construction Traffic and Transport Management – Table 2.5*) estimates overall tunnelling heavy vehicle movements for the station at 29,600 trucks or 275 per day (one way) – total 550 truck movements per day.

This is a significant increase in daily truck movements in the immediate vicinity of the site. The concerns of both facilities relate to the potential impacts associated with noise and traffic impacts for the construction of Cherrybrook Station, specifically:

- Frequency and noise of associated truck movements associated with daytime operations (7am – 6pm) including impacts on both indoor and outdoor activities.
- Sleep disturbance for permanent residents and staff affected by the 24hour construction period over an extended 42 month period.
- Psychological affects upon the client residents within Inala due to changes in daily routines (refer attached correspondence from Psychologist).

- Pedestrian and vehicle conflicts for deliveries, staff and client parents or carers of both facilities. Currently 11 clients walk between Inala and Dulkara on a daily basis whilst other clients will walk between the two facilities as part of daily activities (for example) to collect or drop off items.

The EIS nominates the Inala site (Receiver Area D - 80metres from the works) as a sensitive receiver with predicted noise levels exceeding the required levels during the daytime period for the period [NML (Noise Management Levels) exceedances less than 10dB predicted] for the Station Box Construction phase of the works (EIS – Chapter 10 Noise and Vibration – Construction - *Table 10.11 Predicted noise level exceedances at Cherrybrook Station*).

We request the EIS (Chapter 10 Noise and Vibration - Construction) and associated tables be updated to include the impact of construction noise on the Inala site over a 24 hour period (evening and night periods) (*Table 10.10 Nearest sensitive receivers to Cherrybrook Station* and *Table 10.11 Predicted noise level exceedances at Cherrybrook Station*). The site contains permanent intellectually disabled residents and is occupied 24 hours a day over 7 days.

Although the EIS indicates an acoustic shed will be established as a mitigation measure to reduce airborne noise impacts at sensitive receivers during the night-time period, it is unclear what measures will be put in place to manage noise in the vicinity of the Inala site during a 24 hour period (including night time at rest periods).

It is therefore requested that the Department of Planning and Infrastructure consider specific measures to reduce the impacts of noise on the Inala site during a 24 hour period and assess any reduction in noise levels associated with installation of acoustic mitigation measures (i.e. by what margin would the NMLs exceed the required levels following implementation of mitigation measures).

#### **b. Air Quality**

Air quality is described within the EIS as a non-key environmental impact (Chapter 19 Assessment of Non-Key Issues). The EIS states 'The sources are considered temporary in nature and would be confined to the construction period' (page 19-3). Given the construction period extends over a period of 42months for Cherrybrook Station, the description of the 'temporary' nature of the potential air quality impacts is questionable.

The Inala site is identified within as a 'sensitive receiver' in relation to air quality, with potential air quality impacts originating from establishment of work site, building demolition, earthworks, removal, storage and/or transport of some 60,000m<sup>3</sup> of spoil from the station cavern excavation and 370,000m<sup>3</sup> from the tunnelling works, and exhaust emissions from operation of construction vehicles and plant (page 19-7).

In respect of both Inala and Dulkara, the nature of the activities means that clients undertake a range of activities both indoor and outdoor. Inala offers a range of activities that vary throughout the year, depending on the summer or winter weather. Clients are not all outdoors at the same time; however the amount of time they (as a whole) spend outside can extend over quite a period of time.



In addition, some of the permanent residents within Inala have shown themselves to be very sensitive to noise, light, activity levels and vibrations and there are very real concerns regarding the actual impacts of construction upon their behavioural patterns.

It is understood that a number of air quality mitigation measures are proposed during construction works, through which dust and exhaust emissions can be 'largely controlled' (page 19-13). The concern of Inala is the nature of the mitigation measures that will be employed to minimise the direct impacts on the residents and staff of both facilities, specifically nature and type of wind breaks, hoardings, stockpile locations, debris screens etc.

#### **c. Visual Amenity**

The EIS (Chapter 16 – Visual Amenity) identifies the buildings of the Inala site as set back around 50m from Franklin Road, however *'due to the scale of the construction site it expected that the amenity of views from the school would experience a noticeable reduction in visual amenity'* (page 16-24).

In addition, the EIS identifies a number of components that will be visible during the construction period (such as acoustic shed, hoarding, gantry and tower cranes, vehicle movements).

These structures will result in a heightened level of curiosity in some clients causing safety concerns. These clients have a range of intellectual disabilities and the concern is that in their attempts to satisfy their curiosity could lead to unlawful entry and pose a serious risk for danger to both themselves and persons working within a construction site.

It is of extreme importance therefore that the construction site be totally obscured and secure at all times from these clients as they go about their daily activities. This will require further investigation and discussions in order to develop an appropriate solution.

#### **d. Amenity**

The economic analysis (EIS – Chapter 13 Local Business Impacts) identifies that operating amenity of locations such as Inala and Dulkara can be affected by construction activity, resulting in potentially negative employee productivity, interaction with customers and workplace ambience.

### **8. Identified Concerns**

Some of the general concerns that have been identified include:

- a) Client safety and quality of life for residents living adjacent to the site;
- b) Impact of noise, dust, and vibration on residents;
- c) Risk to clients from construction activity including large trucks and machinery. Pedestrian safety and risk management around this;
- d) Compliance with proposed operating hours; and
- e) Impact of site lighting on Karimi residents.



Some of the specific areas of concern include:

**Inala** - Gate 1 provides all the access for service contractors, administration, staff, deliveries, Group Home clients and staff. This access needs to remain available as it is not possible to relocate services from this area. Consideration needs to be given to this when the placement of the gate for the truck access to the work site is decided.

Gates 1 and 2 provide access for emergency services (fire and ambulance). Due to the complex health of some of the clients at Inala, ambulance services on occasion are required to attend. Naturally clear access is required for fire services if required.

Noise and Dust Management – with the increase in truck traffic to this area and the changes in access to Castle Hill Road, it is foreseen that this will also have an impact on the Administration staff.

**Dulkara** – it has been proposed that there will be traffic lights installed in Franklin Road at the junction of Franklin Road and Castle Hill Road. This will allow left and right turns in and out of Franklin Road of which the right turn currently does not exist.

Inala's concern is that it will potentially increase or encourage local traffic to take the opportunity to access Castle Hill Road, which in turn will cause more congestion and therefore a greater risk to the pedestrian safety of the Inala Clients as clients from both the residential's located on the Franklin Road site and our Radley Place site walk to Dulkara via Franklin Road.

There is already a high volume of traffic due to Tangara School. This traffic is both private vehicles and school buses.

## **9. Recommendations and Management Measures**

Having regard to the length of the construction period and the unique difficulties facing Inala we therefore request that the following recommendations be adopted.

- a) No truck entry or exit on Franklin Road. All truck movements should be via the entry from Castle Hill Road (Glenhope Road).
- b) Construction of an uninterrupted perimeter hoarding fence on Franklin up to Castle Hill Road from Kayla Way at an effective height that will prove an effective acoustic barrier and visual screening of the proposed construction (Site 4 – Cherrybrook Station) from clients as they go about their daily activities. Further discussion will be required with management of Inala in designing an appropriate solution.
- c) Fenced pedestrian pathway down Franklin Road left hand side.
- d) Colourbond fencing on Inala boundaries on Franklin and Castle Hill Roads.
- e) Franklin to be one-way south of Kayla Way.
- f) Operating hours for truck movements/noise to be restricted to protect resident's quality of life and peaceful enjoyment of their home (i.e. not 9pm – 6am Monday to Friday or weekends).

- g) Review the width of Franklin Road at its intersection with Castle Hill Road and immediate section with a view to upgrading and/or widen this section.
- h) Shielding of any construction related lighting from Residents.
- i) Education of site workers to provide an awareness, understanding and respect for the special needs of Inala's clients.
- j) No parking on Franklin at Castle Hill Road end (already very narrow and increases risks).
- k) Arrangements to allow the continuation of the use of Gate 1 for garbage and delivery trucks.
- l) The EIS (Chapter 10 Noise and Vibration - Construction) and associated tables be updated to include the impact of construction noise on the Inala site over a 24 hour period.
- m) Details of operational measures to be implemented to monitor and clean the outdoor areas of both the Inala site and Dulkara in the event that dust and material from construction activities cannot be contained.

## **10. Conclusion**

As outlined within this submission, our clients' primary aims are to protect the health and wellbeing of the clients and staff; maintain the operational capability of its operations; and ensure that the construction phase of the Northwest Rail Link will be managed in a manner to allow Inala to operate with minimal disruption during the lengthy construction period.

Specific consideration in the finalisation of design and operational outcomes must be given to the unique situation faced by Inala in providing for clients with complex and high support needs. Additionally on-going consultation and review with Inala management during the construction phase to monitor the effectiveness of visual and acoustic barriers, traffic management, and implementation of alternative measures is deemed necessary.

We trust that this submission assists the Department in its deliberations. Representatives from Inala Organisation would like the opportunity to further discuss the matter with Departmental officers.

It would be appreciated if contact could be made with our office to make suitable arrangements

Yours faithfully

PGH Environmental Planning



**Patrick Hurley**  
Director

### **Client Contact details:**

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**Inala**

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*CC-Inala*

**Attachment** - Correspondence from QUOVUS Pty Ltd, Consulting Psychologist dated 2 May 2012.



2 May 2012

**Regarding the impact of proposed rail link construction activity on  
Inala service provision to clients with complex and high support needs**

To whom it may concern,

I am writing at the request of Ms Kim Clinch, Manager Residential Service Inala, to provide my clinical opinion on the impact of the long term (3-4 years) location of a construction site within close proximity to the current home of three men with complex needs and disabilities.

In my role as Psychologist, I have provided clinical support to Inala residential services for over 10 years. During my engagement I have provided specific advice around the management of behaviour and general risk assessment for these three men currently living at the Karimi home. Each of these men currently experience significant challenges in communication and understanding others and the world around them. They all rely on staff support to guide their daily lifestyle and ensure they are able to regulate their emotional and mental health.

The proposed construction activity, will have a significant impact on these vulnerable men. The intrusion of noise and the interest attraction of the construction activity is likely to have a significant impact on support to ensure both the safety and quality of life of the group. I anticipate that there is likely to be an increase in the requirement for support staff numbers, an enhancement to training and clinical support to the unit, along with modifications to the physical environment to manage risks. As a group these men have shown themselves to be very sensitive to noise, light, activity levels and vibrations (movement). Disruption of such a nature has historically resulted in escalated behaviour and the need for great restriction of their lifestyle, medication increases and decline in their general mental health.

I hope that this letter provides some context to the concerns presented by stakeholders, and I am happy to be contacted for further discussion as required.

Kind Regards,

Lisa Fahey  
Director



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