



INNER WEST COUNCIL

SUBMISSION FROM INNER WEST COUNCIL TO THE DEPARTMENT OF PLANNING & ENVIRONMENT

ON WESTCONNEX STAGE 3 (M4-M5 LINK) MODIFICATION 1

SEPTEMBER 2018

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Introduction

Council appreciates the opportunity to comment. However, as could be said for most WestConnex public exhibitions/notifications, the short exhibition period (14 days in this case) has not allowed sufficient time for Council and the community to thoroughly assess the documentation and prepare a detailed submission, nor has it allowed for a draft submission to be considered at a Council meeting before being lodged. Should additional comments be raised by Inner West Councillors, these will be forwarded to the Department of Planning & Environment (DP&E) as a late addendum to this submission.

Given the modification has significant implications for residents of Haberfield-Ashfield and St Peters, Council believes that holding community information sessions at those locations would have been justified.

Inner West Council continues to oppose WestConnex, preferring the substantial funding for the project had been directed to public transport, active transport, modest/targeted road network improvements and demand-management options. In October 2017, the then newly-elected Inner West Council resolved that *"Inner West Council formally adopts a position of continued opposition in the strongest terms to the WestConnex project, both approved and future stages including Stage 3, consistent with the opposition of the former councils of Ashfield, Leichhardt and Marrickville."*

Notwithstanding this opposition, Council continues to work with the NSW Government, Sydney Motorway Corporation (SMC), project contractors and the community to ensure impacts are minimised and benefits gained wherever possible. In doing so, Council has raised many issues about local impacts - environmental, health, traffic, transport,

construction and economic impacts, as well as lack of adherence to good planning and management practice. These concerns continue to be communicated in all of Council's submissions and other dealings over WestConnex, including this submission.

Council is particularly concerned about the health impacts from the construction and operation of the project. For construction, these concerns are based on the lived experience of Haberfield-Ashfield and St Peters residents affected by Stages 1 and 2 from late 2015 to date. Ill-health has resulted from sleep deprivation as a result of night works and construction dust. For operation, the main concern is the impact on air quality from the unfiltered ventilation facilities and increased surface traffic.

In its 2017 submission on the Stage 3 Environmental Impact Statement (EIS), Council had requested the NSW Government undertakes a health study of affected residents, focusing on children and other vulnerable residents, with the findings of the study to guide the planning of Stage 3. Although such a study has not been undertaken, it remains that health impacts of WestConnex are a major concern for Council and the community.

As is apparent in the more detailed comments below, the modification presents both benefits and costs to the community. Clearly the main benefit is removal of the Darley Road tunnelling site from the project, particularly as there was widespread recognition that operation of this site would be problematic for a number of reasons, including impacts on surrounding residents.

Removal of Darley Road however comes at the expense of an additional six months of construction activity at the other spoil extraction sites at Haberfield-Ashfield, Annandale-Camperdown and St Peters. This means an additional six months of noise, vibration and dust for residents near these sites than would have been the case if the project had proceeded as currently approved.

For affected residents of Haberfield-Ashfield and St Peters, this extra six months will be added to the three years of impacts endured from Stages 1 and 2 and four years of impacts from Stage 3. Given the added time increment of impacts, the long duration of impacts (over a total of seven years) and the fact that there are likely to be cumulative impacts from the overlap of Stages 1 and 2 with Stage 3, the health of these residents will no doubt suffer.

Council therefore continues to argue that particular attention be paid to residents living near all of the Stage 3A three spoil extraction sites to ensure impacts are reduced and their health is not unduly affected.

Council notes the modification was publicly notified from 12 to 26 September 2018 with modification documents available as follows:

- electronically on the DP&E's major projects website;
- electronically via links from the WestConnex website (a 'community guide' was also included on this site);
- print copies at Council's three services centres and at Haberfield, St Peters and Balmain libraries; and
- electronically via links from Council's WestConnex Weekly Update Report.

Roads & Maritime Services (RMS) staff had briefed Inner West Council and City of Sydney staff on the modification on 30 August 2018 and it was discussed at meetings of Council's WestConnex Community Liaison Forum and RMS's WestConnex Community Reference Group in September 2018. Council notes from Section 5 of the modification report that RMS

has undertaken a number of other notification activities, including door-knocking in affected areas.

General comments on the modification

It is noted from the modification document that further details on all sites that are part of this modification will be within Site Establishment Management Plans (SEMPs) and/or Construction Environmental Management Plans (CEMPs). It is assumed that Council will have the opportunity to comment on these plans before they are finalised and approved, as has been the case to date with similar plans. Council continues to argue that given the size of this project and the extent of impacts, the community should also have an opportunity to comment on construction plans.

It is noted on Page 5-13 of the modification report that a summary of Council staff issues has been included. These are from a 30 August 2018 RMS briefing for Inner West and City of Sydney Council staff. It is expected that these points will be considered by the DP&E in the assessment of the modification request in addition to this submission.

In relation to Part 5.1.8 Page 5-15, Council's main concern is with the length of time impacts will be endured (seven years in total), and the likelihood that there will be cumulative impacts from overlapping project stages, e.g. Stage 3 demolition/establishment works will be underway before Stage 1 is completed.

On Page 6-55 of the modification report, construction fatigue from the extended construction period is acknowledged. After three years, construction fatigue is already an issue in Haberfield-Ashfield and St Peters, and some of these residents will be facing a further four years.

Condition C21 required a *Management and Mitigation Report* to be prepared if Option B is chosen. Council seeks reassurance that the assessment undertaken for this third (hybrid) option is as comprehensive as would be required in the abovementioned report if Option B was chosen.

In Table 6-35 *Qualitative consistency assessment*, it is stated that noise and vibration impacts are generally consistent with those assessed in the EIS, hence *approved* environmental management measures would be suitable. Although this may be correct, the *duration* of impacts has increased in some locations, which should be acknowledged and assessed.

On Page 5-37 cumulative noise & vibration impacts from Stage 3 works are assessed, e.g. simultaneous impacts from construction of pedestrian overbridge bridge and Northcote St site operations. It is stated that Stage 3 cumulative impacts "*are not likely to be an issue*" because: Haberfield-Ashfield sites are of sufficient distance from each other (so impacts will be localised); the sites are adjacent to heavily-trafficked roads that generate ambient noise; and CoA noise management requirements will adequately manage impacts from for night-works. Given affected residents' experiences with significant cumulative impacts from Stages 1 and 2, Council does not agree that cumulative impacts "*are not likely to be an issue*".

The health, visual and other impacts of construction dust *are* major issues, based on affected residents' experiences from Stage 1 and 2. The modification document explains these impacts include: annoyance due to dust deposition (soiling of surfaces) and visible dust plumes; elevated PM₁₀ concentrations due to dust-generating activities; and exhaust emissions from diesel-powered construction equipment.

All these impacts are a concern, but the main issue for Council is the respiratory health effects of elevated particulate levels – mainly dust. It is noted in Appendix D Page 3-1 that the impact of dust particulates depends on a number of factors, including the nature/duration of activity, proximity/sensitivity of receptors, meteorological conditions and the effectiveness of mitigation measures.

The seven-year duration of dust impacts represents a health issue, and affected residents' experiences to date have shown that reporting and enforcement of dust containment has been difficult, e.g. residents have needed to provide photo or video evidence of dust leaving construction sites.

In Appendix A Figures 4-1 and A-1, the large number of 'sensitive receptors' to construction particulates around all construction sites at Haberfield-Ashfield and St Peters is noted. In Appendix A Table 4-7 there is a particulate assessment which concludes that the health risk from demolition is 'high', whilst from earthworks, construction and track-out it is 'medium'. The conclusion in Appendix A p.4-7 that "*construction dust is unlikely to represent a serious ongoing problem*" is disputed, particularly considering the duration of construction and dry conditions prevailing.

In Appendix A Part 5 *Mitigation measures* Table 5-1, the proposed mitigation measures are noted. Based on prior experience with Stage 1 and 2, Council is sceptical that these measures will reduce dust impacts to an acceptable level.

There is a need for strict conditions to ensure footpaths are not unduly obstructed by temporary works and (more importantly) by *permanent* infrastructure such as sign footings, electrical cabinets etc. This is currently a contentious issue for Stage 1, where footings for overhead signs, over-height detectors and electrical cabinets have been placed in a way that they obstruct pedestrian traffic and create a major visual impact. Council is keen to ensure this is not repeated for Stage 3.

Council has no specific comments on Appendix E *Surface water & flooding*, but maintains a general concern about soil settlement from tunnel-induced groundwater withdrawal resulting in cracking of buildings.

Council is concerned that continued use of Wattle Street site for construction will delay implementation of Haberfield Gardens and landscaping of other Stage 1 residual lands.

Comments on the Northcote Street construction site

According to the modification, Northcote Street civil site (C3a) would become a civil and tunnel site, not just a civil site as currently approved. This will mean continuation of noise, dust and truck noise impacts from spoil extraction on adjacent residents, effectively extending the current impacts from three to seven years. It is extension of impacts at this site that is one of Council's main concerns with this modification.

Council's concerns are verified by Figures 5-3 and 5-5, which shows high levels of noise from tunnelling and support works affecting residents in several streets around the site, including: Northcote, Wolseley, Wattle and Cove Streets and Walker at Haberfield; and Frederick and Knocklayde Streets and Earle and Page Avenues at Ashfield. Given the length of time these residents will be affected, there is a need to pay particular attention to how the impacts from this site can be reduced so that they are tolerable.

On Page 5-28 it is explained that the contractor will explore various mitigation options, including: site perimeter hoarding; localised enclosures around noise sources; judicious selection of fixed plant and equipment; optimisation of site layout to maximise localised shielding by on-site buildings; positioning of driveways away from sensitive receivers; and (if necessary) limiting noise intensive activities during sensitive periods. Council supports implementation of these and any other mitigation option that can benefit surrounding residents.

A further concern from the Northcote Street site is vibration impacts from construction of the access tunnels, particularly as they will be at shallow depth and will pass beneath a number of dwellings. In Table 5-12 and Figure 5-8 it is noted that rock-breaker tunnelling works will result in exceedances of acceptable vibration levels for around 40 'residential receivers'. Figure 6-5 shows that there is likely to be 1 to 2mm of settlement from access tunnels affecting dwellings in Walker Avenue and Alt Street at Haberfield, whilst Figure 6-6 shows 3 to 9mm of settlement affecting dwellings in Walker Avenue and Alt Street at Haberfield.

Section 6.3.2 states that dust is the main air quality impact, with the main sources being demolition, earthworks, construction and track-out (from trucks). Table 6-21 states that the risk for human health is 'high' for demolition and 'medium' for the other three activities. Council notes that as the Northcote Street site is already largely established, dust from demolition activities would be reduced. Council is still concerned about the health implications of dust from the other activities, particularly given the long duration of impacts. Council does not agree with the statement on Page 6-59 that air quality impacts resulting from this modification are "*not significant*".

Comments on Northcote Street site spoil haulage routes

According to the modification, there would be two spoil haulage routes to/from the Northcote Street site. Route A is an 'overflow' route that would use Parramatta Road into the site, exiting onto Wattle Street, then travelling along Ramsay Street/Road, Fairlight Street, Great North Road and returning to Parramatta Road (westbound). Route B is the main route that would use Parramatta Road into the site, exiting onto Wattle Street then using the existing/upgraded Dobroyd Parade G-loop, returning trucks to Wattle Street so they can either enter the M4 East tunnel or travel along Parramatta Road (westbound).

Council recognises there are some benefits from the spoil haulage route proposed in the modification over that already approved. The main benefit is removal of the Tebbutt Street 'B-loop', which Council had opposed as it included residential streets and sensitive uses such as a school. Chapter 6 explains that the modification's impact on traffic congestion would be minor compared to what is approved.

Whilst this may be the case, Council remains concerned about the multiple impacts from all spoil haulage routes regardless of whether or not they are approved - even where these are on main roads. Concerns include noise, congestions, road safety (particularly for pedestrians and cyclists), diesel emissions, dust track-out emissions and the possibility of parking and idling in local streets.

Continued use of the G-loop (and fenced area adjacent to the G-loop) will continue to occupy Reg Coady Reserve and have a direct impact on the reserve's amenity and usability. Noise and diesel/dust emissions from trucks using the G-loop will continue to affect residents in the vicinity. The G-loop will also continue to have road safety and congestion impacts. On Page 6-9 it is noted that safe pedestrian pathways will be provided through provision of a shared path around the northern perimeter of the G-loop, in accordance with CoA E57.

There is a need to ensure this path is established at the earliest opportunity, is direct, sufficiently wide and safe for all users.

Council is also concerned about night-time noise impacts on residents from the establishment and de-commissioning of the G-loop. From Page 5-13 and Table 6-26 it is apparent that construction of G-loop will have a significant noise impact for a period of weeks, particularly as works will need to occur at night so that peak (daytime) traffic Wattle Street / Dobroyd Parade is not affected.

It is noted that Route A would only be used between 7am-6pm Monday to Friday and 8am-6pm Saturday – with three exceptions. The first is during early stages of construction until the G-loop is functional, the second is in the event of heavy traffic congestion, whilst the third is during arterial road network maintenance. It is acknowledged that streets along Route A are main roads with high levels of traffic, but Council is concerned about noise impacts on the many residents living on these streets.

As several of the Route A streets are within the Canada Bay Council area, it is expected that this council will also raise concerns about impacts on residents. The night-time impact on these residents is explained on Page 5-18. Regardless of the route taken, noise from the large number of truck movements has a significant noise impact across a wide area. Council therefore supports any management measure that can reduce this noise. This includes: prohibiting parking/idling of trucks in residential streets; training contractors to minimise noise when entering and leaving sites; minimising use of compression brakes (noted on Page 5-18); and maximising use of M4 East tunnels (rather than surface roads) for spoil haulage.

Examination of Figure 2-1 highlights the need for active traffic management wherever driveways for heavy vehicles cross footpaths – particularly important given the high volumes of truck traffic proposed and the truck/pedestrian safety issues that have been raised in relation to Stage 1. Key driveways are those at the entry and exit points to the Northcote Street site.

In Appendix B Figure 4-3, the swept path diagrams for spoil truck routes are noted, but it is questioned why a swept path has been shown for trucks exiting Waratah St to Dobroyd Parade when this is not a spoil haulage route.

Comments on Parramatta Road construction sites

The modification proposes the Parramatta Road West and East sites (C1b and C3b) be used as civil sites, with no tunnelling to occur at these sites. Council is pleased that there will be no tunnelling, particularly as both sites are surrounded by sensitive uses such as residential areas and Haberfield Primary School. Nonetheless, use of these sites raises issues for Council.

Given the number of parking spaces and the nature of activities proposed for these sites, there will be frequent traffic movements on driveways crossing footpaths – creating traffic and pedestrian safety issues. Examining the indicative designs for these sites in Figure 2-13, it is apparent that there could be conflicts with parents and children on route to/from Haberfield Primary School.

It is appropriate that driveways not be created in Bland Street (as proposed) to avoid conflict with this pedestrian traffic, but creation of new driveways on both sides of Parramatta Road would create a risk. Traffic controllers would be needed during school travel times. The driveways to/from Alt Street to the smaller construction sites (car park and

warehouse/storage) may also need to be controlled even though it is acknowledged that pedestrian and vehicular traffic flows would be lower at that location.

Pedestrian/vehicle conflict issues would be exacerbated in Bland Street if/when the Woolworths site is developed. These issues would arise at both the construction and operational stages of the construction of the supermarket.

Notwithstanding driveway traffic issues, provision of car parking on the Parramatta Road sites is welcomed to minimise parking pressures on residential streets, a significant issue for Stage 1. Table 6-9 shows that parking provision appears to be adequate.

It is noted that CoA E54 requires actions for minimum use of kerbside parking by workers and that parking measures be subject to reviews, monitoring and corrective action for non-compliance. This is supported, with the aim that workers have no option but to park in the spaces provided, not on residential streets. Use of technology should also be considered, e.g. electronic parking validation necessary to commence work. Council supports the proposal to encourage workers to walk between all construction sites, noting that a shuttle bus will also be provided.

Importantly, use of the project's Parramatta Road car parks will reduce parking pressures in residential streets around the Northcote Street site. For Stage 1, residents of Northcote Street and surrounding streets have complained about worker parking pressures and the poor behaviour of workers accessing their cars, e.g. playing radios early in the morning and leaving rubbish on the street. These issues have persisted even after the project had employed security guards to prevent parking in these streets. Given the residents around the Northcote Street site will be enduring extended impacts, it is critical that every effort is made to minimise all impacts on these residents, including parking impacts.

Council would like to be involved in details of the proposed relocation of a bus stop on Parramatta Road to ensure there are no negative impacts from this action.

It is noted that site establishment will be undertaken during standard daytime hours. Although both sites are proposed to operate 24/7, it is anticipated that most site activities and vehicle movements will occur during daytime construction hours. It is however important that noise mitigation measures are in place to ensure that night-noise from these sites does not create a disturbance for the many residents living near these sites.

Comments on the temporary Parramatta Road pedestrian bridge

The modification proposes a temporary pedestrian walkway connection above Parramatta Road to connect the Parramatta Road East and West sites for use by project staff during the construction phase. Council does not object to this bridge (particularly as it will be temporary) but it is noted from Figure 5-9 and Tables 5-16 & 5-17 that there will be day and night impacts on nearby residential areas from its construction. In this regard, Council supports the site-specific construction noise mitigation measures shown in Table 5-18, including physical shielding, non-tonal reversing beepers and minimisation of reversing.

Construction of this bridge highlights in broader terms the importance of providing safe and convenient pedestrian crossings of major roads such as Parramatta Road to ensure traffic does not sever connectivity between neighbourhood and prevent the free movement of all pedestrians and cyclists. It supports Council's argument for high quality pedestrian crossings on all streets and roads around the Haberfield Interchange.

Comments on removal of the Darley Road construction site

The modification proposes removal of the Darley Road civil and tunnel site (C4) from the project, with no construction or infrastructure at this location. As stated above, there is no doubt that removal of the Darley Road site is a significant positive feature of this modification. Council and the community had always viewed this site as the most problematic of all the Stage 3 spoil extraction sites due to the number of residents affected and the particular traffic constraints.

In opposing use of this site, Council has always acknowledged that its removal would inevitably mean that more spoil would need to be extracted from other Stage 3A spoil extraction sites. On Page 6-84 of the modification it is explained that removal of the Darley Road site will extend the Stage 3A works program by about six months. This will add six months of impacts to residents near construction sites at Northcote / Wattle Street, Haberfield, Pyrmont Bridge Road at Annandale-Camperdown and Campbell Street/Road at St Peters.

Council is concerned about increasing the duration of impacts on residents, particularly for the Haberfield and St Peters sites where residents have will have already endured years of impacts. Table 6-44 shows the actual increase in spoil removal from the other Stage 3A construction sites, whilst Table 6-43 shows 'sensitive uses' affected by the extended construction period. This shows affected uses will include residential areas, primary schools, pre-schools, church uses and a park. Council is also concerned that the traffic impacts from the extension on the Bridge Road and St Peters sites does not appear to have been assessed in the modification.

Comments on the relocation of the water treatment facility

The modification proposes relocation of the operational water treatment plant from the Darley Road site to the St Peters Interchange (SPI) site. In supporting removal of the Darley Road site from the approval, Council also supports removal of this permanent motorway support facility from the Darley Road site. Establishing this facility at the SPI site does however raise issues for Council.

Council's main issues are visual impact and the possibility that this facility could occupy part of SPI site recreation area, reducing its size. This latter point is not clear from the modification document, other than on Page 9-2 there is a statement that the facility will have a "*minimal impact*" on the SPI recreation area. It is noted that visual impacts will be assessed as Stage 3 UDLP process, and in Table 8-1 it is stated there is a requirement to consider the design of the water treatment facility when viewed from SPI recreation area.

Another issue is the quality and volume/rate of water of discharged. It is noted on Page 6-89 that three discharge options are proposed. Whichever option is chosen, Council is keen to ensure that water quality and the rate flow is such that there will in fact be a "*negligible impact*" on Alexandria Canal as is stated in the modification report.

Operational noise is a further issue, and Figure 6-1 shows there may be an operational noise impact on residents on Campbell Street (east) between Crown Street and Barwon Park Road. On Page 6-3, proposed noise mitigation measures noted, i.e. judicious location selection, noise barriers, silencers, acoustically-lined ductwork and acoustic louvres. Council is keen to ensure that these measures are implemented as part of a set of actions designed to protect residents like these who will have endured a long period of construction impacts.