

**26<sup>th</sup> September 2018**

**Sharon Laura Final Submission 1**

**M4-M5 modification submission:**

Please register the following objections to the WestConnex M4-M5 Link Mainline Tunnel Modification 1.

I strongly object to the overall intention and assumptions of the Modification report, upon which the application is based.

I appreciate and applaud some M4-M5 conditions of approval that have been improved from the M4East conditions of approval. But reference and reliance of the M4-M5 Link modification report upon any out-dated M4 East studies, management and mitigation plans and measures, is not acceptable given these have often been proven to be wrong and not been evaluated.

The proponent proposes a Modification that will extend the duration of the M4-M5 project tunnelling activities by six months, resulting in an increased duration of traffic, air quality, noise & vibration and other impacts.

In Haberfield and Ashfield, the proponent proposes a Modification that will cause WestConnex construction in our community to be extended for a further four years, until 2023. Impacts will also be further extended.

If this Modification is to be approved by the Department of Planning, the Department should also impose further conditions of approval, so as to better manage and mitigate impacts.

There are two tunnel and civil sites proposed in Haberfield, and not one tunnel and civil site (as often cited), which minimises and misrepresents impacts in our community.

Only one site, the Northcote St civil and tunnel site is discussed in the Modification Report. The second site, the Wattle St civil and tunnel site (C1a) is identified in a table, but not detailed, discussed or justified elsewhere.

The spoil haulage route associated with the Wattle St civil and tunnel site (C1a) is not separately identified in the Modification, despite reference to the spoil volume of 311.000 cubic metres coming from the Wattle St Civil (C1a) site.

There are also three civil sites proposed in Haberfield and Ashfield. They are the Haberfield civil site (C2a/C2b), Parramatta Rd West civil site (C1b), and Parramatta Rd East civil site (C3b).

These changes to construction ancillary facilities proposed are identified in Table 4-1 and Figure 4-1 in the Modification report. Detail about the Haberfield civil site

(C2a/C2b) is relegated to an incidental footnote in tables and notes, followed by reference back to the EIS and SPIR.

In total, Haberfield and Ashfield will have five, not three, construction sites for a further four to five years in our community.

The proponent does not offer adequate management and mitigate measures in the Modification report to deal with this. Instead the proponent is relying upon the contractor (LSB) to come up with their own measures to manage impacts, in future development of future of Management and Sub-management Plans – all of which will be developed too late to alleviate the suffering of Haberfield and Ashfield residents.

The exhibition and submission period of the M4-M5 Link Modification application (12<sup>th</sup> -26<sup>th</sup> September) is much too short and unacceptable, given the proposed changes, scope and impacts of WestConnex construction in Haberfield/Ashfield, Five Dock, Camperdown and St Peters.

I object to the community consultation in Haberfield and Ashfield undertaken as part of the M4-M5 Modification process as it has been most frustrating and inadequate, given the scale of WestConnex projects, as well as proposed M4-M5 Modification changes and impacts.

The Modification exhibition period should be extended. Community information sessions should have been held about the changed construction sites and resulting impacts, which are significant. I object that they weren't.

I also object that it is a near impossible task, in any period of time (currently 14 days), to make sense of what is in the Modification application, and of what is really proposed in Haberfield and Ashfield, - because the Modification constantly refers and relies upon, but does not give details, of sequential changes in the M4-M5 Link EIS and M4-M5 Link SPIR (and the M4 East EIS and Approval) – which have been incorporated into the Modification. I strongly object to this obfuscation in the Modification report. This lack of transparency should give pause to the Department of Planning approving the Modification as submitted to them.

In the EIS and SPIR, we were led to believe that there was a limit of only three construction sites (Option A and Option B), in Haberfield and Ashfield to be considered. Instead, with Approval and the Modification of Approval, it now proposed that five construction sites will be permitted to operate as a Hybrid Construction Option, in Haberfield and Ashfield, until 2023.

With five construction sites operating, we need better management and mitigation measures to be identified by the proponent (RMS) and the contractor (LSB), prior to approval of the M4-M5 Link by the Department of Planning.

Prior to approval of the Modification, the appointed project contractor (LSB) should be required to identify and make publicly available for community comment, their construction design and plans developed since their appointment.

I strongly object to the amendment of M4-M5 Link Condition of Approval C19 as proposed. I suggest an alternative amendment.

As well, I strongly oppose the removal of Conditions of Approval C20 and C21. I suggest they be amended and retained, rather than removed.

C19 relates to the Haberfield and Ashfield construction options (A or B) as presented in Chapter 6 of the M4-M5 EIS, and the Parramatta Road West and Parramatta Road East civil sites. There are 3 Option A construction sites versus 3 Option B construction sites.

C20 requires a Comparative Analysis of key environmental impacts of the use of sites (noise and vibration, traffic and transport, visual amenity and socio economic), but exclude an analysis of site establishment and construction of acoustic shed.

C21 requires the preparation of a Management and Mitigation Report based on the findings of the Comparative Analysis, required by condition of approval C20 and subject to Condition A1

I am strongly opposed to the proposed removal of the above two conditions (C20 & C21) for a number of reasons and based on my experience of living with WestConnex M4East construction since 2016. My lived experience has taught me that M4 East Conditions of Approval have not managed and mitigated key environmental impacts upon residents and businesses, and that regulatory agencies have often been powerless to protect us.

M4East management and mitigation measures were based, all too often upon 'desktop studies' or analysis, inadequate research and consultation. These M4 East management and mitigation measures subsequently became what were incorporated into the M4-M5 Link EIS, SPIR and Approval.

Even when enforcement of compliance of M4East Conditions was possible, in practical terms, given the scope and nature of the WestConnex project, and how it has been developed and built, regulatory teams have often not been able to ensure compliance in a timely manner, because these agencies are inadequately resourced.

Specifically, I object that the M4-M5 Modification application relies too heavily upon information and conditions - based upon inadequate or wrong information used in M4-M5 Link EIS, SPIR and Approval, - which in turn were based upon wrong or woefully inadequate M4East studies, investigations, consultations.

Significant changes, over a number of years have also occurred throughout the development of the M4-M5 Link project. The M4-5 Link Modification does not adequately reflect these progressive changes, frequently relying upon M4-M5 studies and investigation, which are based on out-dated and inadequate M4East studies and investigations, particularly in regard to Haberfield and Ashfield key environmental factors.

It was noticeable in the M4-M5 EIS, SPIR and Approval, that where the two WestConnex projects (M4East and M4-M5 Link) intersect, that no, or very limited new

investigations or studies were done in the Haberfield and Ashfield area, and that there has been an inappropriate reliance of what's been prepared, in the past, for the M4East project. The same can also be said in relation to St Peter's key environmental factors, where the M4-M5 Link intersects with the New M5.

The Modification application compounds this error, by not addressing specific key environmental aspects, notably in Haberfield and Ashfield. I object to this.

I also object that Modification does not address key aspects and offer specific and adequate management and mitigation measures, given the removal of the Darley road site, and asserting (wrongly), that the proposed Haberfield construction sites option (2 Muirs sites and Northcote St tunnelling site), is 'most comparable to Option B' – and that therefore a Comparative Analysis, Management and Mitigation Report is not required.

I also object to the lack of new detailed mitigation and management measures in the Modification application, given that a new construction site option has been proposed in Haberfield and Ashfield.

**In brief, the removal of the Darley Rd site:**

Extends the M4-M5 Link tunnelling and impacts of the project by 6 months,  
Alters the construction methodology,  
Redistributes the burden of adverse impacts, most notably upon residents of Haberfield and Ashfield, and Camperdown,  
Imposes adverse impacts upon residents of Five Dock, currently unaffected,  
Increases heavy spoil-truck haulage around Haberfield and Ashfield,  
Increases heavy spoil-truck haulage along Parramatta Road, from Camperdown to Haberfield and Ashfield, (also impacting many communities along this section of the Parramatta Rd corridor),  
Introduces a new heavy spoil-truck route through Five Dock,  
Delays the return of public green space at Reg Coady Reserve from 2019 to 2023,  
Re-locates the Darley Rd site water treatment plant to St Peters,  
Requires further loss of green space in St Peters,  
Requires the construction of a temporary construction access tunnel, resulting in concerns about settlement and subsidence impacts upon residential properties in Walker Avenue and Alt St, Haberfield.

The duration and severity of impacts, concurrent, consecutive and cumulative, of M4-M4 Link Approval and Modification 1, upon the Haberfield and Ashfield community is significant and extended by six months - at least.

**I specifically recommend:**

- 1. That proposed Modification amendment of C19 is not accepted.** Instead the amendment should recognise that the proposed Construction (Hybrid) Option was not identified in the EIS or SPIR. That the usage of Option A and Option B sites as identified in the EIS & SPIR has been changed. **That the Modification proposes a Construction (Hybrid) Option that is a combination of both Option A and Option B, and represents the new, third construction option.**

2. **That proposed deletion of C20 Comparative Analysis is not accepted. C20 should remain and be amended to now require a Comparative Analysis of the proposed Construction (Hybrid) Option against Option A and Option B.** The proponent is proceeding with a combination of Option A and Option B sites.
3. **That proposed deletion of C21 Management and Mitigation Report is not approved.** C21 should remain and be amended to now require a detailed Management and Mitigation report based upon the Comparative Analysis as required by C20. The proponent is proceeding with a combination of Option A and Option B.
4. **That proposed deferment of landscaping of the surface around the Wattle St (C1a) civil and tunnel site (the M4-M5 entry and exit ramps within the Wattle St surface lanes (between Parramatta Rd and Ramsay St, Haberfield) is reviewed and reinstated.** I object that M4East surface landscaping in this section of the interchange will not occur in 2019 and be delayed until 2023
5. **That the absence of a specific Modification regards the proposed re-introduction of the G-Loop spoil truck turning circle in Reg Coady Reserve, at Dobroyd Parade and Waratah St, Haberfield must be addressed.** The re-introduction of the G-Loop represents a continued loss to our community. It also causes considerable adverse and extended impacts for residents living near the Reg Coady Reserve. The proposed four (4) year delay, of the promised return of the park to our community, should have been clearly and separately identified in the modification application, and warrants greater redress than given in the application.
6. **That the issue of failure to mention or deal with the increased spoil-truck haulage from the Camperdown site along Parramatta Road to Haberfield and Ashfield, and the impact of this spoil route all along on Parramatta Road communities, notably its impact upon Haberfield and Ashfield in combination with other proposed spoil routes in Haberfield, Ashfield and Five Dock, requires more appropriate analysis and detailed mitigation measures than currently proposed.** (Implementation of CoA, C20 & C21 would address this )
7. **That all spoil trucks from the Camperdown construction site be directed to use the M4East tunnels on Parramatta Road.** Otherwise, an option to choose the route, allows for the likelihood that spoil-trucks (truck and dog), will travel along the Parramatta Road surface lanes, crossing the Bland Street intersection, which is a major local traffic, cyclist and pedestrian crossing – in particular used by the Haberfield school community.
8. **That the be further consideration of pedestrian and cyclist access and safety, with appropriate mitigation that includes measures suitable for**

**children with or without carers, frail aged in scooters and walkers and also people with visual impairments or other impairments.** It is noted that there is a proposed re-location of the west bound bus stop at Bland St and Parramatta Rd, as it may obstruct and cause collision between construction traffic and buses, with no mention of possible collision of construction spoil trucks and pedestrians or cyclists. I object to this and also request that any relocated bus stop has a relocated seat and shelter.

9. **That the proposed additional pedestrian bridge across Parramatta Rd is made available for public access.** This would address some of the concerns raised above.
10. **That a review of proposed traffic in and out of the civil and construction sites is undertaken, that addresses needs of local residents.** Parramatta Road West (Ashfield) civil site car proposes access direct onto Bland St, Ashfield, causing dangers for pedestrians, particularly Haberfield Public school students and carers. The proposed civil site driveway will be seriously unsafe if the Woolworth's (former Brescia) site opposite is developed, as currently planned. It is unknown what construction traffic will enter and exit the Haberfield civil site (C2a/C2b). This should be detailed and safety measures put into place to protect pedestrians, cyclists and other cars.
11. **That there should be no entry or exit from Bland St, Ashfield into the Parramatta West Civil site.** This is too dangerous and will encourage construction worker and construction vehicles onto very narrow local roads. The modification application indicates the number of daily vehicles into the Parramatta Road West civil site has increased.
12. **That there should be no direct access and crossing of Alt St into the civil sites into either Ashfield or Haberfield.** Parramatta Rd East civil site and Parramatta Rd West civil sites both propose direct car access and crossing of Alt St, in both Haberfield and Ashfield. Entry into these civil sites should be restricted to direct entry and exit from Parramatta Road.
13. **That there needs to be publicly available, a mitigation and management response to increased traffic, parking and dangers associated with site establishment works, including demolition and construction, of the Parramatta West Ashfield civil site and the Parramatta Rd East, Haberfield civil site, prior to any approval.** Demolition and site establishment works on these two sites, at intersections with Bland St and Alt St, are scheduled to occur before the M4East project is completed. The modification application does not address the imminent chaos and dangers that will result in our community, very close to Haberfield Public school, with approval of overlapping site establishment works and the final stages of the M4East project in the same location.

14. **That there needs to be a specific management and mitigation report detailing how the proponent will handle increased adverse community impacts upon Haberfield, Ashfield, Camperdown and St Peters, caused by the removal of the Darley Rd site.** A separate report should be required, given the longer duration of the project tunnelling and build. In particular the report should note the increased concurrent, consecutive and cumulative impacts of the proposed modified project with the connecting M4 East project and New M5 project. As well, this report should note increased community impacts by new spoil routes through Five Dock, and along Parramatta Road between Camperdown, Haberfield and Ashfield

**It is also unreasonable and confusing that the Modification application:**

- Relies upon management and mitigation measures that were approved by the M4 East EIS, SPIR and Approval, without demonstrating their current relevance to proposed M4-M5 Link construction sites in Haberfield and Ashfield.
- Also, further reliance upon M4-M5 Link EIS, SPIR and Approval documents that do not include management and mitigation measures, specific to the construction option now proposed for Haberfield, and Ashfield.
- M4-M5 Link EIS SPIR, tendered prior to the modification application, frequently refer to or rely entirely upon M4 East EIS, SPIR or approval documentation. But M4East management and mitigation measures, have either not been evaluated since their implementation, or have proven to be grossly inadequate to protect the Haberfield and Ashfield communities.
- Unfortunately, the M4-M5 Link modification application does not provide a separate management and mitigation report about how, in the future, adverse impacts upon the community, will be managed and mitigated by the operation of Haberfield and Ashfield construction sites now proposed, - the Hybrid Option - compared to Option A and Option B sites, as tabled in EIS, SPIR and Approval.
- Given the removal of the Darley Rd site with significant consequences for other sites, the modification application also fails to provide a separate management and mitigation report about how the project builders will specifically manage and mitigate adverse community impacts upon Haberfield, Ashfield and Camperdown, - as well as for residents and businesses along the Parramatta Road spoil truck route from Camperdown; and the spoil route through Five Dock.

Sharon Laura  
26/9/18