



WestConnex Action Group objects to the Modification to the M4/M5 proposal.

Inadequate consultation and notification.

As usual, SMC and RMS have failed to conduct adequate consultation as required by the Secretary's Environment Assessment Requirements (SEARS) and the conditions of approval.

Two weeks is not enough time for residents to be able to absorb these quite major changes to the project and respond. It's clear from the application that this modification will affect thousands of residents and businesses. Many of these residents and businesses have not been notified and do not even know that the modification has been lodged. Unfortunately it is typical of the lack of respect for residents that has pervaded this project since 2013. More time needs to be made available for residents to process and respond to this modification and to understand the likely impacts.

Further to this, the Application for Modifications is not presented in a way that can be easily understood. Some residents are to be subject to a further four years of intense construction if these modifications go ahead. To find out that construction, previously stated to be completed in March 2019 will continue until into 2023 residents would need to bury down into M4-M5 EIS, SPIR and Approval documentation, as well as M4 East EIS, and New M5 EIS, SPIR and Approval documentation. This could be seen as intentionally attempting to make it difficult for affected residents to identify likely impacts. This is unacceptable in terms of consultation. More significantly it is an unreasonable extension to the construction work. Communities already suffer from construction fatigue and have endured years of noise, additional traffic, road closures and the eating away of their suburb. It is completely unreasonable to expect them to endure a further 4 years of even **lesser** impact work.

Given the failure of mitigation of construction impacts for Stage 1 and Stage 2 (documented in hundreds of submissions to a Parliamentary Inquiry into Impacts of WestConnex) it is insulting to repeat promises of mitigation using exactly the same phrases that have already proved to be empty promises. NSW Planning should review their previous approach to assessment that promises mitigation that does not eventuate.

Flawed planning process - Planning on the run

The fact that these modifications can be proposed without more re-evaluation of the impacts on affected communities calls into question the integrity of the planning system. In fact this modification involves a major change including substantial more spoil to be removed at construction sites in Haberfield, Ashfield, Camperdown and St Peters. The construction period has been extended by 6 months, which is a very significant change especially given the high risk of impacts acknowledged by the proponent.

Residents of Haberfield have been lied to about the construction. They were told that there would be no surface construction impacts in their community after the completion of the M4 East. Residents in Haberfield and Ashfield were told repeatedly that it was technically not feasible to continue to use the M4 East Northcote





St tunnel site as a tunnel site for the M4-M5 Link project. The Modification now proposes to use the Northcote St site as a combined tunnel and civil site. What has changed to now make this technically feasible? The Northcote St site under both Haberfield Option A & Option B was only ever to be used as a civil site for car parking. With the Modification it is now to be used as a tunnel and civil site. What has changed to make this both feasible and reasonable, given the impacts upon residents and businesses?

This dishonest planning has exposed residents to unacceptable impacts for another four years. This is not a minor matter to be explained away with promises that the impacts even if significant will be resolved by mitigation. This is the same promise that failed in the past. If the project cannot be done safely, then it should not be done at all.

Major changes are made at the whim of the SMC (soon to be controlled by Transurban) and RMS without any change to the 2015 business case or other EIS and SPIR assumptions that were relied upon for previous approvals.

EPA recommendations should have been followed in M4 M5 EIS approval process.

In its response to the Stage 3 M4/M5 EIS, the NSW EPA recommended against approval before more was known about the actual impacts. Already only months after the approval was granted, substantial changes are being made which significantly change the outcomes for communities. Instead of properly evaluating the changes, we again are told that more detail will follow. At this later stage there will be no opportunity for more input. This whole method of planning is deeply flawed. The proposal to dump a wastewater plant on St Peters is a good example of this.

Wastewater Plant - Relocation to open land in St Peters

It is extraordinary that a wastewater plant that was planned for Leichhardt has simply been flicked over to St Peters which is already bearing an intolerable burden of increased traffic, several years of construction, the health impacts of deteriorating air quality and increased noise levels.

WAG objects to a wastewater plant being shifted and dumped onto land that was previously open space. No approval should be given for this.

No definitive measures for wastewater disposal

The proponent does not yet know how they will dispose of the water. Three options are provided but in fact it is stated that a combination of these options is also possible. The proposal should not be approved without more assessment and certainty.

The proponent should be required to at least do enough work to know what option will be used. There is not even enough information for stakeholders to know what the advantages and disadvantages could be for each option.





The detailed design for the water treatment plant may include a combination of the above options. The indicative location of the discharge outlets to Alexandra Canal being provided as part of the New M5 project works are shown on Figure 5-1. The location of these outlets will be confirmed as part of New M5 detailed design.

Could it be that the NewM5 detailed design is not yet available? Surely after two years of construction, basic information such as the location of discharge outlets has been confirmed?

It is clear that it is likely that the waste could end up in the Alexandria Canal, which is currently subject to an EPA remediation order. It is acknowledged that the levels of some pollutants that are already over limits will increase. This should not be allowed. We should be improving our environment instead of taking actions that further degrades it.

To quote from the application:

Further hydrological and hydraulic modelling will be undertaken as part of detailed design to determine the ability of the receiving drainage systems to effectively convey drainage discharges from the operational WTP at this location. Any potentially contaminated runoff (e.g. commwash bay or a bunded chemical storage area without a roof) would be captured and disposed to sewer via a trade waste agreement or removed by a liquid waste contractor and disposed of offsite at a licenced facility.

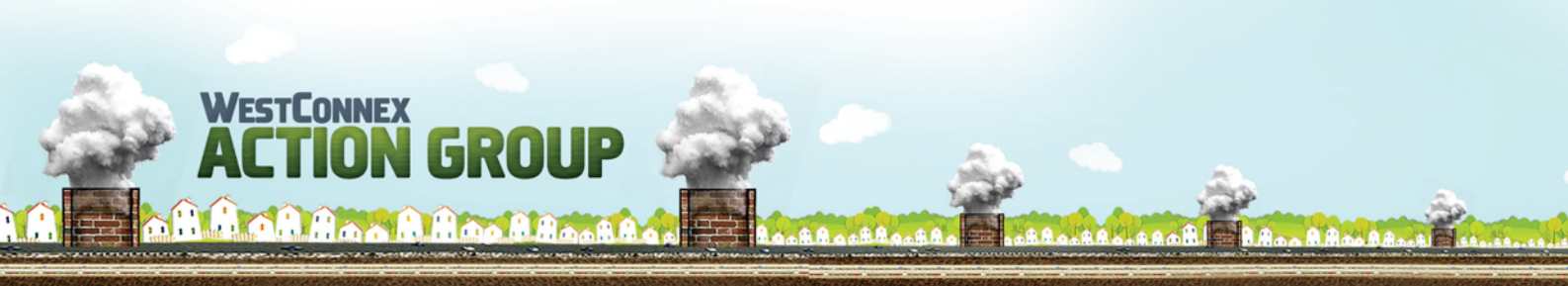
Given the current difficulties with disposal of asbestos and other contaminated waste in NSW, this statement is completely unsatisfactory. Which licensed facility do they have in mind? There are no details on that front. How many trucks will be involved in disposal? How likely is a trade waste agreement with Sydney Water? Residents and Councils should have input into the actual wastewater disposal choices, not vague proposals that leave something as basic as the ultimate destination of the wastewater unresolved.

At the moment CPB contractors, who are responsible for Stage 2, are being prosecuted for the poor management of odours at the site. NSW Planning was partly responsible for this fiasco because it failed to notice that there was no plan in the Stage 2 EIS for how emissions from the old landfill site would be managed following the commencement of construction. NSW Planning should learn from this experience and request more work from the proponent on the management of wastewater.

The applicants claim that the groundwater inflow will not have a serious effect on Alexandria Canal water quality. But how reliable is that claim? But there is no guarantee that there will be a crucial and rigid monitoring program regularly testing (daily or weekly) for the parameters in Table 5-1 at the Water Treatment Plant effluent station prior to mixing with Canal Water. This will indicate if the model parameters were correct or need to be modified. There is simply not enough detail to enable an assessment of the wastewater plant.

The type of treatment proposed is not even identified in the document. This application should be rejected on the grounds that it is not even clear what the wastewater treatment plant will do. Figure 5.1 does not show the





Alexandria Landfill Leachate Treatment Plant. Where is it? Will this be used for any run-off. This is especially important given the past experience with emissions and the inadequacy of the leachate plant.

While the average volume as stated (average of around 23 litres per second) may not affect the existing contaminated sediment in the canal, there is no reference to extraordinary events. There is no explanation as to how the average of average volume of 23 litres per second was estimated. Until the treated discharged water is cleared of the identified contaminants, especially heavy metals, discharge into the canal is not acceptable.

A lack of input from Sydney Water

The proponent should have been negotiating and resolving issues with Sydney Water before putting forward the modification. It is clear from Sydney Water's submission to the Stage 3 EIS that such a level of communication is the minimum that is required. If this modification is approved, SMC will be able to put forward a final solution without formal feedback from other government agencies and Councils. WAG rejects this.

Heavy trucks - extra burden of spoil removal is not acceptable.

While the modification has removed a burden from the residents of Leichhardt (we welcome this), it has now placed an unbearable burden on residents in Haberfield and Ashfield without sufficient reexamination and acknowledgement of the depth of the unacceptable impacts. No community should be ask to shoulder the burden of construction for 7 years.

Five Dock, which was not affected by the M4/M5 in the initial approval process, is now exposed. One business owner in Five Dock explained to WAG that after enduring years of dust, noise and vibration from M4 East trucks that jeopardise the health and safety of her workers, the first she heard of the fact that Five Dock would be used as a spoil route for the M4/M5 was in a news story in the Inner West Courier after the modification was put on display.

The burden of spoil haulage impacts onto the Camperdown-Haberfield/Ashfield Parramatta Rd corridor with a 39.4% increase in spoil removal from the Camperdown Pyrmont Bridge Rd site to nearly 1.2 million cubic metres, and onto the Campbell Road site, with a 24.9% increase to 0.942 million cubic metres (p6-86, Tale 6-44). Again it is proposed to operate these spoil haulage routes on a 24/7 basis.

There is no serious consideration of either the impact of this extra spoil transport burden or mitigation considered in the application. For example, noise mitigation or alternative accommodation offers need to be considered. If NSW Planning leaves the actual mitigation in the hands of the project you can sure it will become a draining and unfair battle between the contractors and the residents as has already occurred in Stage 1 and 2. Now however as residents face years more construction the actual impact on health could be more severe. Where is any serious acknowledgement of this in the application?





Northcote Street site

The proposed Northcote St civil and tunnel site will be operating adjacent to the proposed Wattle St civil and tunnel site. This means that the cumulative local spoil removal impact will increase by 181% from 0.311 million cubic metres to 0.877 million cubic metres. (**Table 6-44**, p 6-86, section 6.5.6, *M4-M5 Link Mainline Tunnel Modification report*). This exceeds the 0.821 million cubic metres of spoil moved from the M4E Northcote, Eastern Ventilation and Walker (PRVF), & Wattle St sites (C7, C8 & C9) (**Table 6-24**, p 6-55, Section 6.9, *M4 East EIS, Vol 1A*). It is equivalent to the 0.893 million cubic metres of spoil removed from Haberfield/Ashfield for the M4 East project. This is completely unacceptable and means that there should be fresh review of conditions of approval that impact on Haberfield. There should be a much stricter limits to hours of operation.

Also why aren't all trucks required to use the M4 East tunnel? There is no explanation for that. The original proposal was for the spoil to be removed through the tunnel so why has this now changed?

Extended construction work

Tunnelling for the M4 east has been continuing since 2016. Now it is proposed that the Northcote site should be the site of 24 hour tunnelling from April 2019 until the beginning of April 2023. No community should be expected to put up with this impact on their amenity, health and well-being.

Residents living in Haberfield and Ashfield, around Northcote St, Wolseley St, Wattle St, Walker Avenue, Parramatta Rd, Dalhousie St, Ramsay St, Alt St, Bland St, Chandos St, Denman Avenue, Dobroyd Parade, Martin St, Waratah St, Crane St and Loudon St, Frederick St, Julia St, Page Avenue, Earle Avenue, Henry St, and Loftus St, Orpington St, will have soon been subjected to nearly three years of intense construction, out of hours work, worker and construction vehicle parking, construction dust, diesel fumes, noise and vibration, constant local traffic and pedestrian detours. Many residents have been already been subjected to 24/7 spoil haulage trucks travelling in front of their homes.

Now it is proposed to make 2 new civil sites on both corners of Parramatta Rd at Bland St and Alt St in Haberfield and Ashfield, 24 hour, 7 day a week ancillary civil construction sites, including constant movement of worker cars, of diesel trucks and other construction vehicles. There should be no permission for 24-hour sites so close to where so many residents live who have already suffered from 3 years of construction and will also be soon confronted by traffic collecting around the M4 East portals. The combined impact of noise and extra traffic has not been assessed.

Overall there will be far more construction in Haberfield if these modifications go ahead. Construction work will continue on the Haberfield civil site at the PRVF, Parramatta Rd smoke site, fitting out the M4-M5 Link chimney and separate support facility. Two tunnel and civil sites are also proposed in Haberfield. The modified Northcote St site, and the already approved and built Wattle St civil and tunnel site (around the M4-M5 entry ramps between Parramatta Rd and Ramsay St). WAG objects to all of this.

Impact on air quality around Haberfield Public School





The modification indicates that there will be an entry point from the Ancillary construction site on the corner of Bland Street and Parramatta Rd, Ashfield, within metres of Haberfield Public School. The Parramatta Rd West civil site is located within 200 metres of Haberfield Public School. The Parramatta Rd East civil site is located within 100 metres of Haberfield Public School

For most of this year, the PM 2.5 levels at Haberfield School have averaged approximately 11 u/gm³ (the national limit is 8 u/gm³). These levels were not predicted in the M4 EIS and should be investigated before students, parents, residents, teachers and carers are exposed to a whole new threat from demolition of Muir's sites and constant 24-hour traffic for another four years.

Unacceptable health risks for residents living and walking near Northcote Street and G Loop at Reg Coady Reserve, Haberfield

Nearer the Northcote Street tunnelling site and the G Loop, residents have been exposed to an average of over 12 u/gm³ for more than nine months. There have been daily exceedances of national limits for PM 2.5, not all of which can be attributed to bushfires. For example on August 18, the PM 2.5 at Ramsay Street averaged more than 30 PM 2.5 u/gm³. At Chullora and Earlwood OEH stations that day the averages were 11 and 14.1 respectively. The continual false assurances from RMS that the air quality along the M4 East route only reflects regional patterns is misleading the public about the serious health risks of such a high level of PM 2.5. NSW Planning should investigate why the EIS predictions appear to have underestimated pollutants. The last thing they should do is move ahead and risk exposing children to even more pollution for four more years.

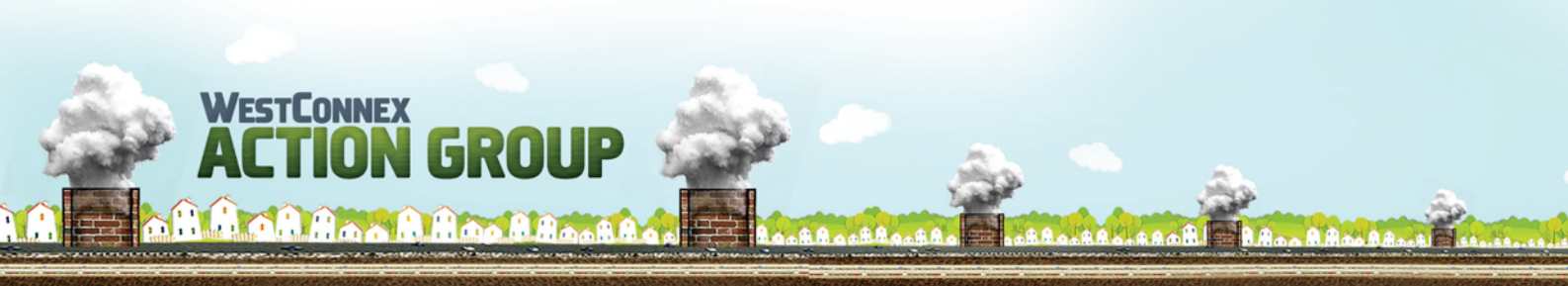
It is unacceptable that residents would have been exposed to high levels of dust and diesel fumes for 4 years. Of course these do not happen at all times but peak at different times than other monitors in Sydney. Even short-term exposure to high levels of PM 2.5 is known to carry risks to health. To consciously expose residents to another four years of risks without a review of the M4 East and M4 M5 EIS Air Quality Data is taking unacceptable risks with the health of residents.

WAG demands a review of the Air quality predictions for the M4 East and for the M4/M5. It is clear that under predictions are being reinforced in further assessments. That WestConnex would now propose exposing Haberfield School and Bland Street residents to even further truck movements without a serious investigation of the potential health impacts is not acceptable.

Construction Dust

Many residents are assessed as being at high risk but this is then pushed aside. More than 901 sensitive receivers would be within 20 metres of construction sites and at high risk of dust (PM 10) impact. We note the reference to the Dust Management Plan. These plans have repeatedly been shown not to be effective. We quote from the application: *" This does not mean that impacts would be frequent or persistent. Overall, construction dust is unlikely to represent a serious ongoing problem. Any effects would be relatively short in duration, and may only arise during dry weather with the wind blowing towards a receptor, at a time when dust is being generated and mitigation measures are not being fully effective. The likely scale of this would not*





normally be considered sufficient to change the conclusion that with mitigation the effects would be 'not significant'." It beggars belief that NSW Planning would accept these assurances after all that has happened on the Stage 1 and 2 sites.

Extra length of time increases all impacts.

We refer to 6-83.. "The overall intensity (rate) of spoil removal ... 'however the additional spoil to be removed would require the extension of the tunnelling component of the overall construction program by about six month. This would increase the duration of environmental impacts associated with tunnelling.' (Also referred to on 4-19) This is a substantial change to the impacts on thousands of residents and should require far more reassessment of impacts than is included in this application.

Also in the application : The Parramatta Road West and Parramatta Road East civil sites would be used 24 hours a day, seven days a week to support civil and tunnelling construction activities at other project construction sites, primarily within the Haberfield and Ashfield area.

The approved project involved the removal and transportation of around 550,300 cubic metres of tunnel spoil from the Darley Road civil and tunnel site as described in section 23.3.2 of the EIS. Given that the length of the mainline tunnel would not change for the proposed modification, this spoil volume would be required to be removed from other tunnelling sites.

The local impact at Wattle St, with both Northcote and Wattle St sites in operation, increases the local burden with the Modification by 181.8% (from 311,000 cubic metres (100%) to 877,000 cubic metres (281.8%)*).

There is no mention in the Modification of spoil haulage route from Wattle St civil and Tunnel site.

Local Roads to be used by heavy vehicles.

A careful reading of the proposal shows that heavy vehicles would use local roads. This should not be approved. See:

Note: 1. Some use of local roads by heavy vehicles delivering materials and/or equipment may also be required, however this would be minimised as far as practicable. 2. Access and egress routes for heavy vehicles relate to spoil haulage vehicles only. Some use of other routes by other construction related vehicles (including heavy vehicles) may be undertaken. These movements would occur in accordance with the relevant conditions of approval for the project. Page 4.5

Safety concerns for students and parents walking to Haberfield School

WAG is concerned for the safety of a school community that will be accessing the school through intersections that are 24-hour routes for heavy vehicles.



Risk of Subsidence

It is alarming that subsidence will be risked at properties beneath the temporary construction access tunnel linking the Northcote St tunnel and civil site under Wattle St and Walker Avenue and the M4-M5 mainline tunnel stubs beneath Alt St, Haberfield.
There needs to be more assessment of the Subsidence.

Previous Underestimation of impacts should not be repeated.

It will be profoundly insulting to residents if NSW Planning accepts the bland assurances that significant impacts will only be temporary and passing, or otherwise or insignificant because of mitigation. We quote from Ramsay Street resident Josefa Sobski submission to the NSW Parliamentary Inquiry into WestConnex Impacts.

It is a giant footprint and it has profound consequences for people, the community amenity and the environment. Its visual impact is dramatic contributing to a complete distortion of the entire landscape surrounding the suburb. Five metre high noise walls will enclose parts of the suburb. It is and has been devastating. From the information supplied on the M4/5 Link or Stage 3, Haberfield will continue to be affected until 2022. But the longer-term impacts on the air quality can only be estimated. No amount of spin from representatives of SMC can persuade residents that air quality will not deteriorate further. We expect an increase in dangerous pollutants in the suburb and its surrounds.

.....

4. DUST EMISSIONS. Masses of dust emissions and dirt settling in every nook and cranny of our homes and vehicles are generated by the construction work and threaten the health of residents as well as exacerbating the breathing problems of those with pre-existing conditions. The elderly have been particularly affected. 5. POOR TRAFFIC MANAGEMENT. Semi-trailers and other heavy industrial vehicles on our residential streets at all hours of the day and night. Up to six truck movements per hour, and because they are sub-contractors hoping for as many loads a day as possible, they are often in a hurry, so they are travelling at inappropriate speeds or parked in local streets very early or very late.

<https://www.parliament.nsw.gov.au/lcdocs/submissions/61458/0011%20Ms%20Jozefa%20Sobski%20AM%20redacted.pdf>

Another resident submitted:

The dirt raised by the project has been constant. Our washing has been stained. Dust comes in everywhere.

Potential flooding in St Peters



We reject the bland assurances that there will be no risk of wastewater being impacted by flooding. Flooding in St Peters is a complex issue which has proved much more difficult than originally envisaged in the New M5 Stage 2 EIS. Far heavier rainstorms have been increasingly experienced in the neighbourhood and there have been many instances of flash flooding in Campbell St and the Princes Highway in the past two years. This was not anticipated by the new M5 EIS, which paid little attention to climate change when assessing flood risks. It took repeated questions, complaints and representations to the new M5 staff to get them to take the flooding issues in Campbell St seriously before the principal engineer for the Campbell St works admitted that it was a complicated problem. This resulted in the modification of the design to include large storage tanks under the re-aligned street (between Florence and Brown Streets) west of the Princes Highway. It remains to be seen how well this deals with flash flooding in this stretch of the road works, given the greater expanse of hard surfaces and the greater height of the road surfaces. This demonstrates why the issues are not simple ones to be resolved with bland assurances. This is a case where in order to protect the public interest the proponent should be required to furnish full information.

EPA should review Appendix D completely

WAG is concerned that the air quality analysis in Appendix A is misleading.

The propositions contained in it should be reviewed from the point of view of actual data recorded by Ecotech monitors along the M4 East route this year.

It greatly concerns us that more than 900 sensitive receivers are less than 20 metres away from construction zones that expose them to high risks. Why is the PM 10 being assessed at **less than 18** annually as in the Tables 4-4 and 4-3 - the PM 10 is currently averaging for this year at approximately 22-23 u/gm³ at Ramsay St. and at Haberfield School it is averaging slightly above 20 u/gm³ (there was an abrupt drop in the Ramsay Street data when the monitor stopped in August that may be corrected in the validation process).

The proponents are discounting the PM 2.5 as that is not part of construction dust but the diesel trucks may account for the disturbingly high annual average of more than 12 u/gm³ at Ramsay Street after more than 9 months (beginning mid Dec 2017).





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