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Mr Glenn Snow
Director Transport Assessments
Department of Planning and Environment
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Email: glenn.snow@planning.nsw.gov.au

Dear Mr Snow

WestConnex M4-M5 Link (SSI 7485) Modification 1

I refer to the Department of Planning and Environment's (DPE) notice of exhibition for Roads and Maritime Services (RMS) modification application for WestConnex M4-M5 Link (SSI 7485) Modification 1.

The EPA provides the following comments on this modification:

- As noted in the EPA's previous submissions in relation to the M4-M5 Link, the EPA is concerned about cumulative construction noise impacts on noise sensitive receivers from this project and the M4 East, particularly night time noise impacts on residences. The EPA notes that condition E88 of the M4-M5 Link infrastructure approval requires at-property noise mitigation under specified circumstances to properties identified in Appendix E of the approval, located in the vicinity of the Northcote St site.

While the EPA notes that the modification report (section 5.1.8) states that the proposed modification does not result in a change to the properties identified within Appendix E, as the footprint assessed in the EIS has not been modified, it is unclear whether there will be a significant increase in the level of night noise impacts from tunnelling or tunnel support activities on residences or the duration of impacts. The EPA would appreciate the opportunity to discuss with DPE the potential need to expand the number of properties to which condition E88 applies, to ensure that all properties with significant and long term construction impacts receive an early offer of at-property treatments. The EPA does not consider it appropriate for this decision to be deferred to the Construction Noise and Vibration Management Sub-Plan, as noted in the modification report.

- To minimise noise impacts on residents, spoil trucks from the Northcote St site should preferably use the Wattle St and "G loop" route (Route B) and then the M4 East tunnel at all times. If this is not possible due to significant impacts on peak hour traffic flows on Wattle St/Dobroyd Parade from G loop operation, then use of Route A (Ramsey St/Fairlight St) could be considered at these times. The EPA considers that this route should not be used during evenings or night periods (ie 7pm to 7am).

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- RMS should consider whether the operational water treatment plant proposed to be relocated to the St Peters interchange site requires an environment protection licence under the *Protection of the Environment Operations Act 1997* for contaminated groundwater treatment. Given the St Peters interchange site is a former landfill, there is potential for groundwater contamination in this area. RMS should note that the criteria for a contaminated groundwater treatment licence relates to the concentration of pollutants in the inflow to the treatment plant.

The EPA would appreciate the opportunity to review the draft conditions of approval that would apply to this modification.

If you have any questions, please contact Mike Sharpin on 9995 6953 or mike.sharpin@epa.nsw.gov.au

Yours sincerely



JACINTA HANEMANN
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