



Submission by the NSW Greens
Modification to WestConnex M4-M5 Link

The Director
Major Planning Assessments
Department of Planning
GPO Box 39
Sydney NSW 2001

3 October, 2018

To the Director,

Please find enclosed a copy of our **submission to the Modification to the WestConnex M4-M5 Link** on behalf of ourselves, our constituents and the NSW Greens.

We reiterate our strong objection to this project and our serious concerns about the impact of WestConnex on our communities, environment and liveability of our city.

Global experience of major toll road construction has demonstrated conclusively that these projects are enormously expensive and counter-productive.

This whole project has been characterised by an alarming lack of clarity and ad hoc planning as well as a disgraceful refusal to assess each stage and the impacts of each stage as a whole. There has been an unwillingness to properly consider, evaluate and mitigate the impact of WestConnex on the amenity of the communities through which it has been bulldozed.

The proposals outlined in the Modification to the M4-M5 Link will exacerbate and extend the unacceptable negative impacts of the WestConnex construction works and will have longer term environmental and social impacts. This Modification should be refused and the component should be required to submit an updated full M4-M5 EIS and updated business case for the whole project which accounts for the multiple significant changes to the project since the previous business case was released.

WestConnex will increase air pollution and global warming and encourage more car use, quickly filling the increased road capacity. It is not a sustainable solution to Sydney's congestion problem. The impacts on the health and well-being of local communities both in the construction and operation phases are unacceptable.

Yours sincerely,

Jenny Leong MP
Member for Newtown

Jamie Parker MP
Member for Balmain



Greens NSW Submission to Modification to WestConnex M4-M5 Link

1) Lack of adequate planning for the M4-M5 and inadequate exhibition and consultation period for the Modification to the WestConnex M4-M5 Link

The WestConnex M4-M5 has been developed in a chaotic and ad hoc manner and these modifications are a further result of this chaotic and ad hoc planning.

The exhibition and submission period of this M4-M5 Link Modification application (12th -26th September) is inadequate and unacceptable, given the proposed changes, and subsequent impacts in Haberfield/Ashfield, Five Dock, Camperdown and St Peters.

This Modification is a further result of the lack of proper planning for this project. It will have significant impacts on traffic congestion in key areas and on the public's amenity for a significant amount of time.

The approved M4-M5 EIS was by its own admission only an 'indicative' plan. The lack of detailed plans for this, the most complex and expensive stage of WestConnex, was staggering and the exhibition and submission period was also woefully inadequate.

In recent months after the April 2018, EIS approval, the M4-M5 project was split into two distinct projects in which responsibility and funding for the Rozelle Interchange and the Iron Cove Link was shifted to Roads and Maritime Services (RMS) and not the Sydney Motorway Corporation (SMC) which is now only responsible for delivering the M4-M5 tunnel Links.

This change to the funding and delivery of the M4-M5 is another result of the ad hoc planning and inadequate scoping of the works for the Rozelle Interchange which did not receive a single acceptable tender for construction given the nature of the 'concept' design. It appears that this underground interchange plus the extra add on Iron Cove Link were removed from the SMC to facilitate the recent sale of 51% of the SMC and as such will place further unacceptable costs onto the NSW public.

We believe that the Modifications to the project should require a new EIS which fully deals with the impacts and details of mitigation measures regarding the proposed changes and also incorporates all other significant changes to the project which have occurred since the original EIS approval.



2) Unacceptable increase in impacts on the community

This Modification application notes at Table 6-43 that: ‘The proposed modification would extend the duration of potential impacts to community safety, health and wellbeing including:

- Health impacts from construction noise and dust generation
- Impact to the community’s perception of safety around roads and active transport connections from spoil haulage vehicles.’

Additionally it notes that the following social infrastructure facilities including 2 public schools and a highly used sports field as well as Sydney Park, will be adversely affected during the additional construction period outlined in the Modification.

- Kingdom Hall of Jehovah’s Witnesses at 12 Wattle Street, Haberfield
- Timbrell Park at Henley Marine Drive, Five Dock
- The Infants Home at 17 Henry Street, Haberfield
- Yasmar training facility
- Chaya’s Family Day Care at 12/111 Alt Street, Ashfield
- Nurjahan’s Family Day Care at 12a/115 Alt Street Ashfield
- Haberfield Public School at 24-26 Denman Avenue, Haberfield
- Bridge Road School at 127 Parramatta Road, Camperdown
- Sydney Park at St Peters

i) Extending the duration of the project

This Modification will extend the duration of the M4-M5 project construction by six months and extend the overall WestConnex construction impacts in Haberfield and Ashfield for a further four years resulting in excessive and unacceptable air quality, noise and vibration, traffic and amenity impacts on these communities.

The removal of the Darley Road site in this Modification will incur significant changes to the approved project and severely further impact the community which incidentally had identified this site as highly problematic prior to any EIS approval.

Haberfield and Ashfield will now have up to five construction sites operating until 2023 and the proposal does not offer adequate monitoring, management or mitigation measures to account for this excessive concentration of works within a highly populated residential area. It is not satisfactory to allow the contractor to provide this detail in Management and Sub Management Plans especially given the highly problematic processes which the community has had to deal with in relation to the M4East works.



Given that the construction impacts of the M4 East works have been unacceptable and managed or mismanaged in an ad hoc and arbitrary way for over 3 years now with scant regard for the residents who have been subject to 24/7 dust, noise, vibration and excessive truck movement impacts, there is a strong possibility that the additional impacts of this Modification will be similarly badly managed causing unacceptable impacts.

ii) Concentration of truck movements

This Modification will significantly increase heavy spoil truck haulage in Haberfield / Ashfield and Camperdown and St Peters as well as establishing a new truck haulage route through Five Dock. This will 'increase air and noise pollution and increase stress and anxiety for road users, reduce access to homes, businesses and social infrastructure and reduce the efficiency of the freight network' according to Table 6-43.

The removal of the Darley Rd site transfers significant spoil haulage impacts onto other construction sites in Camperdown and Haberfield/Ashfield and will impact the health of local residents as well as causing increased traffic delays and congestion as outlined in Table 6-43. There will be a 39.4% increase in spoil removal from the Camperdown Pyrmont Bridge Rd site and a 24.9% increase in spoil removal at the Campbell Road site. It is proposed to operate these spoil haulage routes on a 24/7 basis.

This intensification of heavy truck movements in these suburbs is completely unacceptable. The community is already experiencing intolerable levels of truck movements which are not properly monitored leading to the frequent use of unapproved routes on local roads. The Department of Planning and Environment is responsible for compliance but has shown that it is incapable of enforcing compliance in both the M4East and New M5 stages of WestConnex.

iii) Wastewater disposal relocation to St Peters

The removal of the construction water treatment plants at the Parramatta Road West civil site and the Darley Road site will result in changes to construction wastewater discharges at the Northcote Street civil and tunnel site, the Pyrmont Bridge Road civil and tunnel site as well as the St Peters Campbell Road operation complex.

Discharges from the Northcote civil and tunnel site will be approximately 1,100 kilolitres per day. At the Pyrmont Bridge Road civil and tunnel site, construction wastewater discharges will increase to around 1,400 kilolitres per day. This is approximately a 15% increase from the daily discharge volume described in the EIS.

The relocation of the permanent water treatment plant from Darley Road to the Campbell Road motorway operation complex at St Peters interchange will mean that the



operational water treatment plant will discharge on average around 23 litres per second of treated flow into the Alexandra Canal which is already assessed as being contaminated.

This is an acceptable outcome and will mean that the level of constituent contamination (i.e. copper, lead, zinc, nitrogen and phosphorus) which will be discharged into the Alexandra Canal will add to the existing exceedances according to the specifications outlined in the NSW Water Quality Objectives in relation to aquatic ecosystems in marine / estuarine waters.