



INNER WEST COUNCIL

**SUBMISSION FROM INNER WEST COUNCIL
TO THE DEPARTMENT OF PLANNING, INDUSTRY & ENVIRONMENT (DPIE)
ON MODIFICATION 3, WESTCONNEX STAGE 3 (M4-M5 LINK):
IRON COVE VENTILATION UNDERGROUND (SSI-7485-Mod-3)**

DECEMBER 2019

Introduction

Inner West Council has a long-standing position of opposing inner-city motorways such as WestConnex, Sydney Gateway and the future Western Harbour Tunnel, instead preferring public and active transport solutions to Sydney's traffic problems. Notwithstanding, Council appreciates the benefits potentially provided by this modification, including reduced surface infrastructure at Iron Cove and the subsequent reduction in overshadowing and visual impacts, and an increase in the extent of publicly-accessible landscaped areas.

Council is however concerned that since the M4-M5 Link Environmental Impact Statement (EIS) was approved in April 2018 there have been incremental changes in the project as a result of modifications. Council objected to Modification 2 as it involved the addition of a vehicle overpass, and has concerns about this modification as it involves additional tunnelling. In its 2017 EIS submission to the EIS, Council had raised concerns about these kinds of incremental design changes. These modifications mean the community cannot rely on the originally exhibited EIS to understand the project and its impacts during construction or operation.

The Modification 3 report cites a number of issues which raise particular concerns for Inner West Council, including the maintenance and usability of additional residual lands and noise and tunnelling impacts on additional homes. These issues are discussed below.

Residual lands

The proposed modification would increase the amount of residual land as a result of the undergrounding of structures that were originally proposed on the surface. Whilst this is potentially beneficial in that it would increase the extent of landscaped open space, it is not known at this stage if all (or any) of this additional residual land would be useful to the community. Motorways usually create little-used areas adjacent to roadways carrying high-volumes of traffic at high speeds. As Council has stated in relation to earlier stages of WestConnex, it does not want to own and/or maintain residual land that is not useful to the community.

The WestConnex M4-M5 Link Environmental Impact Statement (EIS) cites the benefits of reduced traffic on Victoria Road as a result of the Iron Cove Link and says the project "*would act as a catalyst for urban renewal along parts of Victoria Road*". However, earlier this year Council staff had viewed initial design plans for Victoria Road adjacent to the project which showed a high-speed road with wide travel lanes, pedestrian fencing and large turning radii at side streets, apparently in accordance with specifications of the project's Design & Construct Deed.

This would indicate that the resulting roadside areas would have poor amenity as spaces adjacent to large volumes of fast-moving traffic are not enjoyable for use. They would provide no benefit to local communities which are already negatively affected by the project.

Tunnelling impacts

The proposed new ventilation tunnel and associated caverns would have a total length of about 425m, with about 20m of access tunnels connecting the caverns. The new tunnels and caverns, ranging from 8 to 30m in depth, would extend beneath homes in Callan Street, Waterloo Street and Cambridge Street in Rozelle.

The modification report states that areas subject to settlement would change, with areas not previously identified by the EIS to now be affected. Ground settlement from tunnel construction and the resulting damage to properties has been a significant concern for Inner West residents, as is evident by the numerous EIS submissions that had raised this issue.

DPIE's Environmental Assessment Report for the M4-M5 Link EIS sought to apply strict criteria and conditions to protect properties against tunnel-related damage. DPIE had not adopted the application of the 'zone of influence' which restricted property condition surveys to within 50m of tunnel alignments, instead preferring a geotechnical model to define this zone.

Council has been contacted by property owners who have said they were concerned about property damage, but were not approved for property condition reports. Extension of the tunnelling associated with this modification should be backed by a commitment from the contractor to support all property owners who are concerned about tunnelling impacts even if they are outside the 50m zone.

Noise impacts

The modification report outlines construction noise impacts on dwellings not previously identified in the EIS, as well as potential operational noise from the high voltage regulators to be located on the surface.

The additional homes to be affected from this modification would be in addition to the 19 extra dwellings to be affected as a result of the overpass outlined in Modification 2, which is still to be determined. The expanding noise footprint from these modifications is unacceptable, reinforcing Council's concerns about the originally exhibited EIS underestimating the extent of the final project and its impacts.

Whilst Council recognises that for WestConnex Stage 3 there have been improvements in community engagement processes, and stronger conditions imposed for managing construction noise compared to Stages 1 and 2, Council's experience is that construction impacts can be significant even with full compliance. This is highlighted by the fact that Council continues to receive noise complaints (particularly about night noise) for early works in and around the Rozelle Interchange.

The modification report states that operational noise sources from electrical equipment would potentially result in sleep disturbances. Any mitigation of this additional disturbance would be assessed against the background noise level which will increase as a result of the traffic created by the project. It is not unacceptable that these creeping noise levels are imposed on people in their homes. It again demonstrates Council's concerns about designs changing after the project has been approved.

All dwellings affected by traffic noise and operational noise from equipment need to be protected to the highest standards with measures that do not diminish existing living conditions. This issue was experienced by some residents of St Peters and Haberfield-Ashfield when noise mitigation resulted in the need to keep doors and windows closed without adequate ventilation.

Addendum – comments from Rozelle residents

The following comments (quoted) have been forwarded to Council from Rozelle residents with a request that they be included in Council's submission. These comments are supported by other Rozelle residents and by Council.

First resident:

“As you would be aware, a proposal to make changes to the approved design of the Rozelle Interchange Project has been submitted to the NSW Department of Planning, Industry and Environment (DPIE). I am very concerned about the overall impact that the WestConnex project is having on our community and am seeking your support in trying to achieve an improved outcome. This application for change opens up the project design for further and more positive revisions. I believe that with the weight of your influence and that of the Inner West Council, the DPIE can be compelled to apply conditions to their approval. Below are two conditions that I believe must be applied:

- 1. The EIS and the approval of the Rozelle interchange preceded the Parliamentary Inquiry into WestConnex. The recommendations of this Inquiry should inform the Department of Planning, Industry and Environment (DPIE) in its decision to approve the proposed changes. The Parliamentary Inquiry stated: “That the NSW Government install, on all current and future motorway tunnels, filtration systems in order to reduce the level of pollutants emitted from ventilation stacks”. Therefore the ventilation stack on Victoria Road opposite Callan Street and the 3 ventilation stacks in the Rozelle Goods Yard must include filtration as a condition of the approval for the proposed changes.*
- 2. All residual land along Victoria Road at the Iron Cove Link should be used for community based amenities, such as planting, parks and playgrounds. Specifically the residual land on Victoria Road between Callan and Springside Streets should be planted with mature size trees and become a park for all residents to enjoy. Since our community has been ravaged by the destruction of historic homes and the removal of all vegetation, including mature aged trees along Victoria Road, this would help reinstate some of what has been lost.*

It is important to note that this is consistent with the DPIE's Place, Design and Public Spaces policy, which states: “We create great places and experiences for all, plan for a changing and thriving NSW, inspire strong and resilient communities and regions, and ensure the responsible and sustainable use of NSW's resources.”

Thank you for considering my advice and I hope to see it included in council's submission to the DPIE.”

Second resident:

I received an email from [the above resident] who lives in Callan Street regards the changes to the approved design of the Rozelle interchange project and I wanted to add my support to his stand on the changes, in particular to the residual land along Victoria Road at the Iron Cove Link should be used for community based amenities, such as planting, parks and playgrounds.

[The above resident's] focus is on the land between Callan and Springside whereas my concern is the land at the top of Clubb Street. I agree with his comment that since our community has been ravaged by the destruction of historic homes and the removal of all vegetation, including mature aged trees along Victoria Road, this would help reinstate some of what has been lost.

I also agree with his stand that the NSW Government install on all current and future motorway tunnels, filtration systems in order to reduce the level of pollutants emitted from ventilation stacks. Therefore the ventilation stack on Victoria Road opposite Callan Street

and the 3 ventilation stacks in the Rozelle Goods Yard must include filtration as a condition of the approval for the proposed changes.