

H15/107148-24

Ms Mary Garland
Team Leader – Roads (WestConnex)
Infrastructure Projects
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Garland

Re: WestConnex M4 East Submissions report

Thank you for the opportunity to comment on the submissions report for the WestConnex M4 East project. While we appreciate the responses the Westconnex team have provided to our submission, some responses do not adequately address our concerns, These are discussed below.

Issue description – use of annual mean concentrations of air toxics

Contrary to the proponent's response, providing the appropriate air toxic concentrations in the air quality assessment that are relied upon in the human health risk assessment is of significant benefit and vital to the transparency of the process. Health suggests the proponent develop a separate appendix in the air quality assessment that provides the data required to calculate health risk as per the human health risk assessment.

Issue description – elevated receptors

The preliminary results provided in the proponent's submission are encouraging. However little background to these results is provided and Health believe the proponent needs to work with the local planning authority to develop a comprehensive plan for future development near and around all stacks.

Issue description – scenarios with higher than expected traffic flows

This response relies in part on the modelling of the regulatory worst case scenario, the results of which are referred to in table 4.4. However this table does not include all pollutants of concern, such as particulate matter, nor does it include a time period greater than 1 hour.

Issue description – discrepancies and internal inconsistencies in reporting

While Health acknowledges the response the proponents have made with regard to the internal inconsistency in the report that Health has highlighted, there is no further discussion with regard to what other actions the proponent has undertaken to identify and confirm any other existing internal inconsistencies.

Issue description – noise levels during construction / noise and vibration management measures

While NSW Health is satisfied that the EIS discusses potential mitigation measures, no firm commitment or guidance on how and when to apply mitigation measures are made. This will

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only be undertaken during the development of the CNVMP. We strongly support a clearer and transparent commitment on implementation of mitigation measures.

Issue description – operational phase / traffic noise predictions / background noise

NSW Health notes that the proponent has included operational traffic noise monitoring within 12 months of commencement of operation with the aim to compare actual noise performance against predicted noise performance and considering additional management measures for sensitive receivers if predicted levels are exceeded.

Issue description – open windows

Sleep disturbance criteria developed for this EIS have been based on the assumption that noise levels are reduced by 10 dBA with an open window. NSW Health recommends considering the fact that some dwellings may only provide a 5 dBA reduction with an open window. This could potentially mean more receivers to be adversely affected by night time noise levels.

Issue description – management measures communication plan

The proponent should commit to include a communication plan in which two-way communication will occur with individuals who may find it difficult to advocate for themselves, especially those who are elderly, who do not speak English, are housebound, or who may be unwell. The proponent did not address this.

Issue description – construction mitigation for vulnerable individuals

The proponent has not made a commitment to develop tailored mitigation strategies for vulnerable individuals.

Should you wish to discuss this matter further, please contact Dr Ben Scalley, Deputy Director, Environmental Health Branch on 9424 5721 or bscal@doh.health.nsw.gov.au.

Yours sincerely

 18/12/15

Professor Wayne Smith
Director Environmental Health Branch