

OUR REF:

11 January 2016

Attention: The Director
Infrastructure Projects, Planning Services Department
Application No. SS1 6307
GPO Box 39
Sydney NSW 2001

Dear Sir/Madam,

**RESPONSE TO WESTCONNEX SUBMISSION REPORT COMMENTS ON CITY OF CANADA BAY
SUBMISSION REGARDING THE EXTENSIONS TO THE M4 EAST TUNNEL ON
THE CITY OF CANADA BAY COUNCIL**

The City of Canada Bay appreciates the opportunity to respond to the WestConnex Submission Report. Attached herewith is our response, prepared by GSA Planning.

Whilst Council accepts a number of the responses made in the WestConnex Submission Report, we are extremely disappointed that the majority of our major concerns previously raised, have not been addressed. Council considers that it is essential that these issues should form part of the planning process and not be left for consideration at a later date.

This is particularly the case where Council will have responsibility for residual land and returned infrastructure. Other concerns arise where residents' amenity will be severely affected, and where road connections are not maintained. All potential implications for Council, residents, businesses and Council's delivery of services, both during and post-construction should be addressed at this stage

Yours sincerely,



Gary Sawyer
General Manager
City of Canada Bay

OUR REF: Ltr_15275

11 January 2016

Attention: The Director
Infrastructure Projects, Planning Services Department
Application No. SS1 6307
GPO Box 39
Sydney NSW 2001

Dear Sir/Madam,

**RESPONSE TO WESTCONNEX SUBMISSION REPORT BY
THE CITY OF CANADA BAY COUNCIL**

We appreciate the opportunity to respond to the WestConnex Submission Report on behalf of The City of Canada Bay Council. This is the second submission prepared by the City of Canada Bay Council. Council has identified the potential impacts from WestConnex that we would ask to be assessed.

The City of Canada Bay accepts a number of the responses made in the WestConnex Submission Report. These issues include clarifying matters such as the frequency of use of Emergency Ventilation Stacks; heritage matters; proposed landscaping; measures to assist the relocation of residents in the Concord Precinct, and tunnel water disposal being separate to Council's water harvesting system.

However, Council is disappointed that the many of its major concerns previously identified, have not been addressed. This submission summarises the WestConnex response to Council's earlier list of concerns and then provides Council's further reply to those issues.

This response is divided into eight (8) sections. Section 1 details Council's Traffic and Transport comments; Section 2 details the issues associated with Noise and Vibration; Section 3 details the Council's concerns relating to Urban Design and Amenity; Section 4 Land Use and Property, Section 5 Social and Economic, and Section 6 concludes the report.

1.0 Traffic and Transport

The City of Canada Bay continues to have a number of major concerns regarding the likely impacts on traffic and transport resulting from WestConnex project. Council considers these concerns should be addressed at the planning stage.

1.1 Issue Description – Projected Traffic Flows on Local Road Network

1.1.1 WestConnex Response

The traffic and transport assessment study area was based on forecast [of] wider traffic impacts. ... the study area includes roadway and intersections that would be primary impacted by the M4 East project... Further locations ... external to the study area were not assessed as traffic volumes, patterns and performance would be comparable with or without the project.

1.1.2 Council Reply

The WestConnex response has not addressed the traffic flow concerns raised by Council. Council maintains its original position that the potential traffic impacts on local roads have not been properly considered.

1.2 Issue Description – Projected Level of Service at Intersection of Parramatta Road and George Street

1.2.1 WestConnex Response

The scope for creating additional capacity at the Parramatta Road & George Street intersections is limited given recent approvals ... the lack of alternative routes ... due to the railway corridor, and [because] lane utilisation and phasing changes on George Street North have already been incorporated ...network and corridor optimisation ... by Roads and Maritime ... would manage... capacity at upstream intersections to reduce delay at this location and reduce the risk of queuing interfering with the operation of other critical intersections.

1.2.2 Council Reply

The response quotes text from the EIS which was already reviewed by Council. Council remains concerned that significant increases of delays at the intersection of Parramatta Road and George Street are a direct result of WestConnex. The EIS indicates a Level of Service (LOS) of F. This is unacceptable.

Council again requests the intersection of George Street and Parramatta Road be upgraded or alternate access points to the M4 be provided to reduce congestion resulting from the WestConnex project.

1.3 Issue Description – Projected Level of Service at Intersection of Concord Road and Patterson Street

1.3.1 WestConnex Response

As previously discussed, Section 11 of Traffic and Transport Assessment in Appendix G of the EIS provides details of the following proposed operational management techniques and management measures that are specific for the Concord Road corridor:

- *Queuing at Patterson Street ... could be relieved by the provision of additional northbound capacity however this would require land acquisition and is not considered a feasible approach at this time. ...Roads and Maritime ... could prioritise northbound traffic flow when upstream queuing issues are detected*
- *....network and corridor optimisation approach by Roads and Maritime would permit use of capacity at other intersections to reduce specific delays at this location and reduce the risk of queuing impeding the project southbound off-ramp*
- *Upstream and downstream traffic signals at Sydney Street and Parramatta Road could reduce queues on the exit ramp by increasing gap acceptance opportunities on Concord Road.*

1.3.2 Council Reply

The concerns identified by Council are not satisfactorily addressed by the quoting of text from the EIS which was already reviewed by Council. Council remains concerned about the significant increase in delays at the intersection of Concord Road and Patterson Street as a direct result of WestConnex. Further upgrades to the intersection of Concord Road and Patterson Street should form part of this project to increase LOS and reduce queuing.

1.4 Issue Description – Construction Worker Parking

1.4.1 WestConnex Response

A Construction Traffic Management and Safety Plan (CTMSP) would be prepared in addition to the Construction Environmental Management Plan (CEMP). The TMSP would include the guidelines, general requirements and principles of traffic management to be implemented during construction. It is mandatory for the construction contractor to take all reasonable monitoring, communication and implementation measures to ensure that consequent road user delays are kept to an absolute minimum and that access is maintained for all road users.

1.4.2 Council Reply

Council previously identified the potential for workers parking in car-parks of community facilities and surrounding streets and sought undertakings to maintain public car-parks and minimise on-street construction worker parking. Council is responding directly to the CTMSP.

1.5 Issue Description – Tunnel Emergency Management

1.5.1 WestConnex Response

If the project is approved, a TMSP would be prepared in addition to the CEMP; in accordance with the relevant conditions of approval. The plan would be developed in consultation with relevant councils, emergency services, road user groups and pedestrian and cyclist user groups. The CEMP and all sub-plans would require approval by DP&E.

1.5.2 Council Reply

Council requests to be involved in the preparation of both the TMSP and CEMP prior to their finalisation.

1.6 Issue Description – Relocation of Bus Stops on Concord Road (Eastern & Western Sides including closure of Carrington Street)

1.6.1 WestConnex Response

Bus stops that would require relocation have been identified in the Traffic and Transport Assessment in Appendix G of the EIS ... Public transport changes including changes to bus stops, which may require relocation of multiple occasions during construction of the project to facilitate surface works, are ultimately the responsibility of Transport for NSW and would be addressed in the CTSMP. The relocation or removal of these facilities would be determined through consultation with all relevant stakeholders including Transport for NSW, councils and bus operators.

1.6.2 Council Reply

The response provided does not address the concerns previously raised by Council, particularly regarding the closure of Carrington Street for the provision of a bus stop. An alternative location of the western side bus stop is required, because the closure of Carrington Street is not supported by Council. Council requests WestConnex consider consolidation/relocation of the bus stop on the eastern side of Concord Road. Council previously raised concerns regarding accommodation of articulated (“bendy”) buses. A meeting between key stakeholders regarding the consolidation and relocation of bus stops is strongly recommended.

1.7 Issue Description – Connections between Streets Severed by WestConnex:

- **Alexandra Street and Edward Street**
- **Proposed cul-de-sac on Sydney Street near Thornleigh Street**
- **Carrington Street Closure at Concord Road**

1.7.1 WestConnex Response

A range of alternate design options have been considered in development of the preferred design as assessed in the EIS. The detailed design of the project would continue to evolve as part of the detail design process in consultation with key stakeholders, however, the proposed alternate layout as suggested in this submission does not form part of the project for which approval is being sought.

1.7.2 Council Reply

WestConnex’s response does not address the lack of connectivity concerns previously raised by Council, which include risk of increased anti-social behaviour, loss of passive surveillance and difficulties for large vehicles required to perform U-turns. The response does not indicate what approval process will be undertaken and if there will be the opportunity consultation at a later date. Council also requests it be involved in any consultation.

Council seeks a commitment that:

- the connection between the western ends of Alexandra Street and Edward Street is maintained post completion of the WestConnex works;
- that Council’s proposed design for the Thornleigh Street/Sydney Street intersection is implemented;
- that Carrington Street remains open to Concord Road.

1.8 Issue Description – Cycle-ways

1.8.1 WestConnex Response

The existing cycleway on the outside shoulders of the existing M4 has been closed for construction of the M4 Widening and would remain closed during construction of the project. An alternate cycle route has been implemented as part of the construction of the M4 Widening, which may also be used during construction of the project. Other alternate cycleway diversion options may be developed during detailed design of the project, subject to discussions with relevant stakeholders.

1.8.2 Council Reply

Council understands that this can be addressed through CTMSP will respond to that document directly. However, a stated intention to link cycle-ways is required in the CTAMP.

1.9 Issue Description – Pedestrian Routes to/from Parramatta Road, Pedestrian Access: Concord Road South Bound

1.9.1 WestConnex Response

Due to the tight radius curve of the Concord Road southbound off-ramp, vehicles would be travelling at relatively low speeds. Vehicles would also be required to give way to through traffic on Concord Road. Therefore, an at-grade pedestrian crossing at this location is considered to be an acceptable solution and is consistent with similar motorway off-ramps connecting to arterial roads in an urban environment.

The pedestrian footpath on the eastern side of the interchange would connect to Alexandra Street, and the existing footpaths would connect to Ada Street.

1.9.2 Council Reply

Council remains concerned regarding the safety of pedestrians at the proposed at grade pedestrian crossing. Council does not object to maintaining pedestrian access along the eastern side of Concord Road, especially since maintaining pedestrian access along the western side of Concord Road is not understood to be viable.

2.0 Noise and Vibration

The City of Canada Bay has concerns regarding the likely impacts of Noise and Vibration on residents and workers from WestConnex project and the shortfall in mitigation measures proposed. Council considers these issues should be addressed at the planning stage.

2.1 Issue Description – Construction Impacts at Lucas Garden Public School

2.1.1 WestConnex Response

A pre-construction assessment of the construction noise and vibration impacts of the project has been completed and is presented in Section 10.4 and Appendix I of the EIS. This assessment has included consideration of the Lucas Garden Public School as identified in the figure at Appendix B of the NVIA at Appendix I of the EIS... During construction, the project team would continue to work with the community to ensure they are informed about the project and have opportunities to provide feedback to the project team.

2.1.2 Council Reply

In order to ensure stakeholders have opportunities to participate in the ongoing refinement of the design in order to minimise project impacts, Council requests hard and soft copies of the Final Communication Plan be provided for distribution to local stakeholders.

2.2 Issue Description – Noise Barrier Locations and Design

2.2.1 WestConnex Response

A noise barrier was considered in this location [above the dive structure] (refer NW_SYDNEY_01 in section 8.3 of the Noise and Vibration Impact Assessment at Appendix I of the EIS). Noise from other roads resulted in the performance of this noise barrier not achieving a five dB insertion loss, which is typically the minimum required. While there was found to potentially be some degree of noise benefit from a barrier in this location, based on further feasible and reasonable considerations the barrier could potentially sterilise future use of the adjacent land by restricting visibility and/or access. Therefore, at-property treatments were recommended for the triggered receivers instead of a barrier...

Low noise pavement was considered as an additional management measure where reasonable and feasible. This is generally considered where there are groups of four or more receivers that qualify for consideration of noise management and where vehicle speeds are sufficient, on the motorway, such that reduction of tyre/road noise using lower noise pavement results in a reasonable benefit to the total road noise.

2.2.2 Council Reply

Council's response to those arguments is:

- Placement of the acoustic barrier on the southern side above the dive structure would still provide visual access to the area and planting can soften the wall;
- Future redevelopment of the site above the dive structure is unlikely and therefore unlikely to provide noise attenuation for the Sydney St residents. A barrier is preferable for residents' amenity;
- Every opportunity to minimise noise impact on residents should be undertaken including low noise pavement.

2.3 Issue Description – Acoustic Treatments of Noise-Affected Dwellings

2.3.1 WestConnex Response

A list of properties considered eligible for consideration of at-property treatment is provided in Appendix N (electronic copy) and shown graphically in Appendix O of the Noise and Vibration Impact Assessment at Appendix I of the EIS.

2.3.2 Council Reply

Council is concerned that affected residents will not be adequately protected by a acoustic barrier on the southern side of the land created by the roof of the tunnel entry.

3.0 Urban Design and Amenity

The City of Canada Bay has concerns regarding the potentially detrimental impacts on the amenity of residents and workers, from WestConnex project. Council considers issues of Tunnel Plant relocation and locations for Public Art should be addressed at the planning stage.

3.1 Issue Description – Cintra Park Tunnel Plant Relocation

3.1.1 WestConnex Response

The location of permanent operational infrastructure at Cintra Park has been determined having regard to existing conditions, the design principles for the project, the extent of impacts and impact management requirements.

The exact location of operational infrastructure at Cintra Park would be confirmed during detailed design to minimise the potential for impacts on adjacent properties. This would include consideration of potential alternative locations in consultation with council.

3.1.2 Council Reply

The Tunnel Plant locations are an important consideration for both neighbour amenity and future use of Cintra Park. Whilst Council welcomes the opportunity to consult with WestConnex regarding operational infrastructure locations, Council maintains its position that these items should be located next to the water treatment plant to ensure minimal impact to residents adjacent to Cintra Park. Council also considers a critical concern to be the resulting configuration of the land when returned to Council's care. The configuration should enable organised sports' use.

3.2 Issue Description – Street Lighting

4.2.1 WestConnex Response

The surface roadway lighting design would comply with AS/NZS 1158 Lighting for roads and public spaces, and would be designed to minimise light spill in accordance with AS 4282:1997 Control of the obtrusive effects of outdoor lighting. Council's comments regarding ownership and type of street lighting is noted.

3.2.2 Council Reply

Council notes the response does not address Council's concerns regarding ownership of street-lighting or the specification of LED lamps for reduced energy consumption.

3.3 Issue Description – Public Art

3.3.1 WestConnex Response

The design of acoustic barriers would be developed during detailed design, to ensure that the urban design and landscape objectives of the project are met. Walls would be designed to minimise visual impacts on adjacent properties and where possible to be consistent with the surrounding landscape. Opportunities to use vegetation to provide a visual screening in conjunction with acoustic barriers would also be considered.

3.3.2 Council Reply

It is Council position that public art should be included as part of the project. Council considers the WestConnex response has not addressed the issue raised: the inclusion of public art. It is not clear under what criteria a future expert panel will consider the provision of public art.

4.0 Land Use and Property

The City of Canada Bay continues to have concerns regarding the form proposed parks and any infrastructure to be transferred to Council following completion of the project. Council considers these issues should be considered at the planning stage, as part of the WestConnex project.

4.1 Issue Description – Inadequate Access and Functionality of Proposed Parks

4.1.1 WestConnex Response

The future use of residual land and associated rezoning does not form part of the project. These matters would be determined by Roads and Maritime in conjunction with the relevant authorities, including local councils.

4.1.2 Council Reply

Due to the difficulty in accessing the proposed parks, Council maintains the appearance of road structures and residual land would be improved by mass native planting rather than large grassed areas which are unlikely to be used. The WestConnex response states that future use of the proposed parks does not form part of the project. In Council's opinion, the urban design of that land should be considered as part of the project in order to ensure a cohesive approach.

4.2 Issue Description – Infrastructure intended to be transferred to Council's Control

4.2.1 WestConnex Response

Roads and Maritime would continue to consult with council in respect of the stewardship of local roads. The advice from Canada Bay Council is noted.

4.2.2 Council Reply

To clarify, in addition to local roads, Council was referring to any infrastructure, including public open space. If there is a future intention to request Council take over any left over land then Council requests input regarding the treatment and programming of that space.

5.0 Social and Economic

The City of Canada Bay is concerned the Social and Economic impacts of WestConnex project on residents, youth, businesses and workers, have not been adequately addressed. Council considers these issues should be addressed during the planning stage in order to ensure any impacts are minimal.

5.1 Issue Description – Relocation of Public Housing Residents

5.1.1 WestConnex Response

Roads and Maritime and SMC are in negotiations with NSW Land and Housing who are actively seeking alternative accommodation for the existing tenants of these two properties. NSW Land and Housing are supporting these affected tenants during this process.

5.1.2 Council Reply

Council notes that NSW Land and Housing is seeking accommodation for existing tenants of two social housing properties. However, neither the EIS nor RMS Submission has identified the specific social support mechanisms and advocacy support streams that will be offered to tenants. **Council requests that specific support mechanisms be named and provided, via in-person case managers, as part of the public housing tenant relocation.** This would include assisting tenants to move and settle into the new property, orientation into a new community, material aid such as furniture and white goods where required, making connections to key support services in the new area such as schools, medical assistance, transport options, banking, essential services and other social supports.

With regard to the relocation of 129 Residents, generally, Council requests that relocation specific case management and welfare services be included in the acquisition process; including assisting residents move to new homes, particularly for those who are older, frail, disabled, with lower English proficiency and with other needs. In-person case management support is to be included and be made available in community languages via translation or language specific workers.

5.2 Issue Description – Youth Facilities

5.2.1 WestConnex Response

Provision of the suggested basketball court or street skate area is not proposed as part of the scope of this project. However, as part of the proposed management measures for the project, it is intended to design the 'island' park that is publicly accessible within the ramps at the Concord Road interchange to meet Crime Prevention through Environmental Design (CPTED) requirements including, where feasible, a space that would actively encourage a significant level of park use. The design of this area would seek to enable such facilities to be provided by others in the future and consultation would be undertaken with Council as part of the Urban Design and Landscape Plan development process.

5.2.2 Council Reply

The WestConnex response suggests that the youth facilities proposed south of the entry from the Concord Road southbound ramp could be included in the island park that is publically accessible within the road structure.

Council does not believe that the island park is a suitable use for this land for the following reasons, inter alia:

- Given the size of the area, the levels above the road surface and the distance to any buildings there will be little or no passive surveillance, which severely compromises the safety of any users.
- Access to the space is not safe or convenient, which will reduce its attractiveness to users.
- It would be a very difficult space to maintain and service.

- It would be surrounded by busy roads, which apart from the safety issues compromises the user experience, which would limit participation.
- Its development as a passive space limits the opportunity to provide visual relief from the mass of road infrastructure going in and therefore detracts from the motorist experience.

Council maintains its position that the safest and most effective location for these facilities is where it is proposed in their original response and that the space should have CCTV as part of the tunnels camera system.

5.3 Issue Description – Local Economy Post Construction

5.3.1 WestConnex Response

There are a number of existing centres in the vicinity of the project area that are likely to benefit from additional economic activity generated by workers over the three year plus construction period of the project. These include centres such as Homebush, North Strathfield, Concord, Burwood, Five Dock, Ashfield and Haberfield.

It is considered premature at this stage to align proposed management measures for the project with the Parramatta Road Urban Transformation Program given the lack of certainty regarding the final outcomes of this study.

It is agreed that the recommended management measure in Chapter 8 of this report to develop a Business Management Plan to effectively communicate with affected businesses during the construction of the project is a priority and, as such, would be developed prior to the commencement of construction. The plan should address the key issues raised by impacted businesses including traffic and access arrangements, car parking arrangements and local supplier opportunities. It would be informed by the consultation that has and would continue to occur with local businesses and Councils during the detailed design and application assessment phases.

5.3.2 Council Reply

Council considers the EIS and WestConnex Submission Response have not identified adequate mitigation of ‘acquisition’ and ‘other business’ impacts. To address the impacts from these two categories, Council asks the Business Management Plan be locality focused to assist residents, businesses and visitors identify ways to navigate changes.

Council requests WestConnex produce a series of easy to understand navigational maps and schedules showing impact on each precinct/place. These would include illustrated bus stop location changes, alternative safe pedestrian routes, redirected cycle routes, parking options, and where businesses have relocated to – in addition, each precinct would be accompanied with a schedule showing when changes commence and end.

Council requests that the following sets of information be amalgamated into concise precinct/place based maps and schedules for maximum user-friendly communication to the community. Currently the information on scheduled commencement, bus stop changes, pedestrian route and cycling route changes are listed in separate tables/sections throughout the EIS. The maps and schedules could accompany the Community Communications Strategy and the 24 hour project information line:

- Traffic and transport assessments in EIS Chapter 8 and Appendix G,
- Actual Physical Changes to Network (EIS Table 6.2),
- Proposed Construction Ancillary Facilities and Indicative Activities (EIS Table 6.5),
- Surface Road Network Changes (EIS sections 5.9.1, 5.9.2, 5.9.3)
- Other sections and tables as relevant

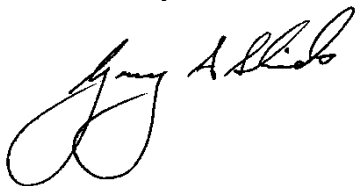
6.0 Conclusion

Whilst the City of Canada Bay accepts a number of the responses made in the WestConnex Submission Report, Council is disappointed that the majority of its major concerns previously raised, have not been addressed. These include:

- The likely impacts on traffic, transport and the City of Canada Bay internal road network resulting from WestConnex project;
- The likely impacts of noise and vibration on residents and workers from WestConnex project and the shortfall in mitigation measures proposed, particularly to residents;
- The potentially detrimental impacts on the amenity of residents and workers, from WestConnex project with regard to the Cintra Park Tunnel plant, which should be relocated;
- The form and function of proposed parks and the infrastructure to be transferred to Council following completion of the project; and
- The social and economic impacts of WestConnex project on residents, displaced residents, youth, businesses and workers, which have not been adequately addressed.

Council considers these issues should be addressed during the planning stage in order to ensure any impacts are minimised, and that issues of Tunnel Plant relocation and locations for Public Art should be addressed at the planning stage. Despite the comments in the WestConnex Submissions Report, Council considers these issues should be considered as part of the WestConnex project.

Yours faithfully,



Gary A Shiels
MANAGING DIRECTOR