

SUBMISSION REGARDING WESTCONNEX M4-M5 LINK MOD-3

I would like to submit the following concerns in relation to the **Iron Cove Ventilation Undergrounding Modification proposal - application number SSI 7485**:

Concern: Design of Proposed Ventilation Tunnels and Caverns

Key design concerns include:

1. Operational noise and vibration impacts for residents directly above or adjacent to the caverns

- The modification report fails to specifically address the impact on residents located directly above or adjacent to the caverns of long term ongoing noise and vibration associated with the operation of the ventilation fans and equipment. Ongoing noise and vibration will have a significant, negative impact on residents' long term health and wellbeing and must be a key consideration for any modification design.
- At a residents' forum held on 3rd October 2019 specifically to address this Iron Cove Link modification, Westconnex/Contractor Project Team experts provided contradictory answers as to what the exact noise and vibration impacts for residents located directly above the caverns would be. This indicates that insufficient or inadequate noise and vibration modelling was done prior to finalising the design modification. Residents were advised to go and stand next to the above ground ventilation facility near Bunnings in Haberfield to gauge for themselves the likely impact – a totally unacceptable response and clearly not based on hard data given the design of the Haberfield ventilation facility is very different to what is being proposed for Iron Cove.
- The report fails to address what preventative measures will be put in place to ensure residents above or adjacent to the caverns are not impacted by noise or vibration once the fans are operational.
- The report also fails to address what controls will be put in place to monitor and assess noise and vibration levels associated with the operation of the ventilation equipment on an ongoing basis.
- Similarly, the report does not adequately address potential mitigations measures if noise and vibration levels are found to be unacceptable to residents once the equipment is operational.

2. Depth, size and location of the ventilation tunnels and caverns

- The proposed modification to build ventilation tunnels and caverns and move some ventilation facilities underground will, in its current form, subject a significant additional number of residents to shallow tunnelling with associated disruption, risks of property damage and loss in property value.
- The size of the underground caverns appears to be significantly larger than the approved above ground buildings, and raises questions about the size of the underground footprint of the caverns. A larger than absolutely necessary footprint increases both the level of risk (of damage, ongoing noise & vibration) and the numbers of residents potentially impacted.

- Increasing the depths of the tunnels and caverns would help mitigate these risks, as would reducing the size of the caverns e.g. configure the equipment within the caverns in line with what was approved for the above ground facilities.
- It is disappointing that the alternative design option to locate the ventilation facilities underground within a ventilation building at a depth of 40 metres was dismissed. It is also disappointing that other alternative designs, impacting fewer residents, were not considered by this modification proposal. It would appear that relatively short-term construction impacts and project deadlines/profitability have been prioritised over the long-term impacts on those additional residents who will be directly affected by this proposed modification.

The ventilation facility undergrounding modification should be redesigned to address the serious long term impacts on residents wellbeing outlined above.

Concern: Reclassification of the Iron Cove Site as a Tunnelling Site

The modification proposes to reclassify the Iron Cove site as a tunnelling site to excavate the ventilation tunnels and caverns. If approved this will impose additional impacts including truck movements, noise and disruption on residents living in an area which will already be heavily impacted by the major Iron Cove Link works.

This modification should not add additional impositions onto residents living in that area in addition to what has already been approved through the EIS.

Concern: No Guarantee Residual Land Will be Returned to the Public

By moving some ventilation buildings underground, the size of the above ground ventilation facilities will be reduced. Accordingly, residual land will be available upon completion of the project.

In addressing the claims the modification design will have the benefit of increased greenspace – it is noted that WestConnex has no responsibility for, nor can it deliver on this. That lies with the Residual Land Management Plan and in fact it seems unlikely parkland is in the future given that:

“In relation to the Proponent’s intent for the land fronting Victoria Road between Springside Street and Byrnes Road to be returned as passive open space, once construction is completed. Whilst the Department encourages open space delivery in urbanised contexts, in this particular case, the Department does not support the use of any remaining land in this location for the purposes of pocket parks in lieu of any other design solution being found.” M4-M5 Link EIS p84

Any residual land arising from this modification should be released to the public via increased greenspace once work is complete.

In Summary, the assessments and assurances in the EIS for the M4-M5 Iron Cove Link were based on an original design which contained a significant error i.e. the lack of ventilation tunnels to take the

polluted air from the road tunnels to the air vent. The solution set out in this modification contains a number of significant design issues and appears to have expediency and project profitability as the key assessment criteria at the expense of long-term community wellbeing. This is evidenced by the multiple issues outlined above; limited considerations given to alternative design options; and supported by statements such as:

“Commissioning of the entire project would begin at Iron Cove Link. Tunnelling of the proposed new ventilation tunnel and caverns from Iron Cove would work to potentially allow the project to commence commissioning two to three months early. Starting commissioning earlier would give the project more opportunity to finish early and more certainty that it would finish on time.” (P.67 M4-M5 Link Mod 3 Main Report)

The ventilation facility undergrounding modification should be redesigned to address the serious long term impacts on residents wellbeing outlined above.