

Department of Planning and Environment
Attn: Director, Transport Assessments
GPO Box 39
Sydney NSW 2001

**Submission on behalf of the Haberfield Association on Westconnex Stage 3 EIS.
- Planning Application SSI 7485.**

16 October 2017

Dear Sir/Madam,

The Haberfield Association was formed in 1980. It has a long history of promoting civic pride in the Federation Garden Suburb and protecting and cultivating its heritage. The suburb of Haberfield forms part of the vital and changing city of Sydney. However, we do not believe that such changes should be detrimental to the residents of Haberfield who themselves, ipso facto, are residents of Sydney. We believe that all Sydney residents should benefit from change and none should be disadvantaged.

The Association acknowledges the profound negative impact on the Haberfield community and its heritage character of the Westconnex Project. The suburb has been divided physically and many Federation homes have been destroyed. Residents have been displaced. Years of work to restore properties have been laid to waste.

The Haberfield Association submits this objection to the WestConnex M4-M5 Link proposals as contained in the EIS application # SSI 7485, for the following reasons, and ask that the Minister reject the application.

1. Our objections are due to concerns including:

**Dust,
Vibration,
Noise,
Road closures,
Pedestrian detours,
Traffic detours,
Road traffic controllers,
Smells,
Fumes from surface generators, trucks and additional vehicles,
Utility relocations,
Out of Hours Work**

2. Haberfield residents have endured enough

The impact of WestConnex M4 East construction on residents of Haberfield is serious and profound. Residents are being impacted by the loss of heritage, loss of vegetation, vibration, the visual destruction of neighbourhood, noise and traffic congestion caused by hundreds of trucks a day travelling through the

neighbourhood, dust, the destruction of properties and businesses, loss of recreation space, stress, loss of sleep and health problems. Many residents will experience these impacts for four or more years and some permanently.

From early 2016, residents have endured the M4 East demolition and construction activity, with tunnelling and truck movements now at peak. Since 2013, residents have had to live with uncertainty and the consequences of residential and commercial acquisitions for the M4 East.

The impact of noise from construction, particularly after hours work, including utilities work and truck movements is of particular concern. Many residents are experiencing sleep disturbance over many nights over years. Some are being affected by noise and disruption from being in proximity to more than one construction site.

Significant numbers of breaches of M4 East approval conditions by contractors are reported, most often with no remedy forthcoming.

The construction periods of the proposed Stage 3 overlap with Stage 1 for around six months. The EIS acknowledges that a considerable part of the proposed construction of Stage 3 will overlap with the construction of the M4 East, but fails to deal with it in any meaningful depth. Residents close to construction areas will encounter significantly worse impacts. The EIS offers no additional mitigation or any compensation for residents for this periods. It is unacceptable that residents should have prolonged periods of exposure to more than one project.

The lived experience of residents from the M4 East project has been that the predicted modelling of impacts was flawed. Many residents were told that a variety of projects undertaken would have no impact on them. Engineers continually expressed surprise that residents could hear work and would be awoken at night by work 400-500 metres away. The reasons for this problem are unclear and the EIS does not offer any explanation or mitigation.

The EIS has not attempted to seriously evaluate what the total cumulative impact of this devastation will be on the community. There appears to have been:

- no serious research into the current impacts on and lived experiences of residents of the M4 East construction
- no serious attempts to measure the cumulative impacts or make concrete suggestions that would substantially mitigate the cumulative impact of these prolonged periods of construction.

It is intolerable that residents in Haberfield should experience such negative impacts over the length of two projects, over eight years.

3. Complaint fatigue

While the EIS addresses construction fatigue it does not address complaint fatigue. This is the experience residents have, when they have legitimate complaints about dust, noise or other pollution, is one of slow response and often no response. If the communication team is pushed, the team member is often irritated by the complaint

probably because they cannot do anything about it. The most common response is a cut and paste email that states that the EPL licence allows such unreasonable noise or other intrusion.

An independent and co-ordinated complaints system should be established, under the jurisdiction of Local Councils. The Inner West Council has proposed operating such a system but any system must be fully integrated so complaints are taken seriously and followed-up to give some level of satisfaction to the residents.

4. We were PROMISED 'NO Stage 3 above ground construction sites in Haberfield/Ashfield'

Haberfield and Ashfield residents were promised that construction of the M4 East would be completed in 2019 and that any further work for Stage 3 would be completed using facilities underground. This was CONFIRMED again in June 2017 at the Concept Design Consultation Session at Haberfield where it was explained the Acoustic Shed would be underground, and that spoil trucks would leave via the M4 East tunnels.

It is intolerable that Haberfield and Ashfield residents would be exposed to a five further years of the atrocious impacts of WestConnex due to the proposed M4-M5 Link.

The M4-5 Link EIS suggests two options for construction sites in Haberfield/Ashfield, options A and B, with three sites proposed as part of each option. The EIS suggests a choice between Option A and Option B, but as the Muir's site has now been purchased, it would appear that a decision has already been made?

It appears that up to six construction sites will be used in the Haberfield/Ashfield area. This potential was been confirmed in discussions at WestConnex consultation sessions with some of our Association members.

The EIS summarises the Haberfield/Ashfield Option A and B in a way that it appears there is a simple choice between 2 Construction Options, each proposing to use 3 sites. However, a closer reading and examination of tables & figures, reveals that the EIS is proposing approval of all six construction sites, with their use to be determined by the project builder after approval has been granted.

Instead of above-ground construction sites, tunnelling should occur completely underground using the newly created M4 East tunnel and stubs as the access point for the M4-M5 link as has been promised. It is both feasible and reasonable that residents should not have to endure any further above ground construction associated with WestConnex Stage 3. At Consultation sessions for the Stage 3 EIS, project team staff have conceded it is feasible to construct Stage 3 without additional above ground construction sites in Haberfield/Ashfield as promised.

Haberfield residents were promised that if the Stage 3 was approved, the fit out of the exhaust stack at the Parramatta Road Ventilation Facility, and underground sites near Wattle St, Parramatta Rd and Ramsay St, would be the **only** sites used for Stage 3 construction in Haberfield.

Although not discussed in the EIS, SMC have confirmed other options under consideration include flipping the Parramatta Road West and East sites so that the tunnelling occurs on the Haberfield side, or having a bridge or tunnel or shaft with a conveyor belt built over Parramatta Road to carry spoil across one of Sydney's busiest roads. How can we be expected to comment on a proposal when options under consideration are not included in this EIS?

We object to any approval allowing a contracted project builder to decide, post-approval the detailed design and management of sites including when where and how to establish and operate any of the Option A or B sites outlined in the M4-5Link EIS . We expect that no government authority would agree that planning decisions that could result in major impacts on the health and quality of life of people should be made without public feedback and Independent analysis.

5. Traffic Impacts of spoil removal and other traffic should be minimised

Haberfield residents are affected by hundreds of truck movements each day from the M4 East, particularly residents on Wattle St. Continued removal of spoil from the M4-M5 link along predominantly above ground spoil haulage routes would continue to impact negatively on local residents until 2022.

The EIS confirms a major impact of Option B upon all streets off Parramatta Rd due to the proposed Parramatta Rd West and Parramatta Rd sites. It also advises of major impacts in Bland St, from Parramatta Rd to Denman Ave. Of major concern is traffic in Bland St considering the 3 main entrances to Haberfield Public School in Bland St, between Parramatta Rd and Denman Ave. The EIS indicates that substantial extra traffic on Alt and Bland streets could affect road safety for children at Haberfield Public School. This risk to our children's safety is totally unacceptable.

Responding to residents concern about heavy vehicles on a busy local road, SMC has reduced the planned spoil haulage hours at Darley Road. The EIS proposes the spoil haulage hours under Option A and Option B in Haberfield/Ashfield to be 24/7. We request that similar notice be taken of our concerns about noise, dust and traffic congestion on local roads and that spoil haulage hours be reduced in Haberfield/Ashfield.

The EIS figures for truck movements indicate that Haberfield/Ashfield will endure in excess of 750 truck movements per day on Parramatta Rd and WestLink/Dobroyd Pde/Wattle St apart from the several hundred from sites in the Haberfield/Ashfield area. The use of the underground acoustic shed and construction sites at Haberfield would allow the trucks used for spoil removal from the Haberfield end of the Stage 3 to proceed underground via the M4 East tunnel.

Our Inner West Council advises that many roads in Haberfield will be used for "rat-running," causing an unfair noise and traffic burden on Haberfield residents.

At an information session SMC staff advised that the truck route for Option B includes trucks using Liverpool Rd and passing through Ashfield shopping centre. This is an ill-considered proposal and a common sense should be adopted.

6. Air Pollution from Generators and Exhaust Stacks is Unacceptable

The EIS confirms that the proposed exhaust stacks at Haberfield will be unfiltered. The Inner West Council's consultants (BECA) have advised that on a still day the unfiltered fine particulate matter and diesel vehicle emissions from the stacks would drift and that these could discharge exhaust pollution onto our residents' homes, our schools and our nursing homes.

Experience from M4 East indicates that a large number of diesel generators will be used and many of these run 24 hours per day, seven days a week.

These sources of air pollution put the occupants of our residents' homes, our schools, our day care centres and our nursing homes at an unacceptable health risk

The 2015 Woolcock Institute report "Review of the health impacts of emission sources ... in NSW" prepared for the NSW EPA & NSW Ministry of Health advises: *"the evidence presented in this report suggests that exposure to levels of PM that currently exist in NSW will have measureable adverse impacts on health, particularly in vulnerable people such as individuals with chronic respiratory and cardiovascular diseases, the elderly, and children. Reductions in PM air pollution in NSW are likely to result in health benefits, particularly for these most vulnerable groups.*

The World Health Organisation has stated that there is no safe level of exposure to fine particulate matter and diesel exhaust emissions. Other developed countries are already regulating the use of diesel and are introducing measures to stop increases in poor air quality. We object to the health impacts of unfiltered ventilation stacks and construction generators in proximity to our school and to the school families who live in the area impacted by fall out from these sources.

As part of the conditions of any approval, there be no use of off road diesel generators.

Further, any approval must include a requirement that the exhaust stack at Parramatta Rd/Wattle St be filtered to limit the level of toxic vehicle emissions released into the atmosphere. We cannot understand why, if the NSW government is spending billions of dollars on this project, it cannot afford to filter the stacks to ensure the least amount of harm is done to those who will breathe this air.

7. No Compulsory acquisition of homes, commercial property or greenspace.

We understand that the Muir's sites on both sides of Parramatta Rd have been acquired by SMC. There should be no further compulsory acquisition of homes, commercial property or greenspace. The other commercial properties on the South/West side of Parramatta Rd should NOT be acquired and instead negotiations should be undertaken with Muir's to return their sites. About 150 homes and commercial properties were destroyed in Haberfield and Ashfield for the M4 East and there has been significant loss of local vegetation and green space. Haberfield should NOT lose any more!

8. The “Indicative only” basis of the EIS is totally unacceptable

The EIS advises “the detail of the design and construction approach is indicative only based on a concept design and is subject to detailed design and construction planning to be undertaken by the successful contractors” making much of the content quite unreliable and useless.

On that basis, NSW Planning must reject the proposal which does not contain any certainty for residents as to what is planned. It provides no proper basis on which the proposal can be approved. The indicative basis of the EIS is a breach of proper process and fundamentally unreasonable. Residents do not have the opportunity to review the final design of the project and this appears to be a deliberate action to ensure residents are not informed. This isn't a consultation process as we cannot understand the full implications of the project.

If WestConnex is sold following any approval of this EIS, the private owners and their contractors will be handed unrestricted control of the final design and implementation of Stage 3. It would be irresponsible to allow that to happen.

If it did, the contractor would not have to take into account community feedback. The contractor would be trying to deliver the project at the lowest cost possible, and no consideration would be given to construction noise mitigation or any of the other impacts on local residents. The EIS should be refused on the basis that it does not provide a clear definition of the project.

9. Urban design and landscaping/community connectivity

The EIS does not include more proposals to improve the urban design and community connectivity in the Haberfield region, which has been decimated by the WestConnex development. The EIS, Community Guide and other material promote the urban design work proposed for the Rozelle and Iron Cove section of the project. However, it appears that Haberfield and surrounding areas of Five Dock and Ashfield have been overlooked. We residents of this area will live with two enormous tollway/portal roads dividing our communities at Parramatta Road and Wattle St.

We request that this project focuses again on the Haberfield/Ashfield/Five Dock regions and develops improved plans for pedestrian and cycling activity. In particular, that the project improves the links across Wattle St/City West Link between Haberfield and Five Dock including an overpass to ensure safety of students and families who cross here to get to/from school, and creates more pedestrian/cyclist crossings across Parramatta Road.

10. “Preferred Infrastructure Report” must be released for public comment BEFORE final approval

We understand that the Preferred Infrastructure Report (PIR) is being written by the Stage 3 proponents. The PIR must be publicly released - with adequate time for public scrutiny and comment - BEFORE any assessment or approval of the Stage 3 Proposal.

It is expected that the Preferred Infrastructure Report will include design details that should have been included in the EIS. It is expected to include plans that will have very significant impacts upon residents and community. The PIR is particularly relevant to Haberfield and Ashfield residents as it would provide detailed information about the above-ground construction sites to be used in Haberfield. The EIS does not provide specific details on which or how many of the six construction sites that would be used in Haberfield.

11. The EIS does not seriously consider alternatives

The Secretary's requirements advise that the EIS is required to provide an analysis of alternatives, including public transport alternatives. The EIS does not meet this requirement. There is general discussion about the need for the project without any detailed analysis of why other solutions including the proposal by the City of Sydney could not be considered. Given the extremely high cost of this project, a detailed analysis of potential alternatives is required.

12. Lack of consultation

There is a Secretary's requirement for "meaningful" consultation, but the EIS fails to meet that requirement. The EIS is such an unwieldy and complicated document that it is almost impossible for a lay person to understand sufficiently to make considered judgements on all of the matters raised. Ours submission represents the Haberfield Association's best efforts to comment on the material in the EIS.

We note that the EIS submission period included two weeks of school holidays, which severely constricted the time the residents could use to consult internally, liaise externally and prepare our response.

13. In Conclusion

We therefore request that Secretary of NSW Planning advise the Minister to reject this EIS, publish the Haberfield Association's submission in accordance with the undertaking on your website, and provide a written response to each of the objections we have raised.