

Attention:
Director, Infrastructure Projects, Planning Services
Department of Planning and Environment
Application number SSI 7485
GPO Box 39 Sydney NSW 2001

Submission - Save Ashfield Park Inc.

I submit 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.

Ashfield and Haberfield residents have suffered enough

It is intolerable that Haberfield and Ashfield residents should be exposed, until 2022/23, to a five further years of the atrocious impacts of WestConnex due to the proposed M4-M5 Link.

From early 2016, residents have endured 17 months of M4 East demolition and construction activity, with tunneling and truck movements now at peak. But for longer, since 2013, residents have had to live with uncertainty and the consequences of residential and commercial acquisitions for the M4 East project.

The impacts of WestConnex construction on residents in Haberfield and Ashfield from the construction of the M4 East are serious and profound. Residents are being impacted by the loss of vegetation, vibration, loss of heritage, the visual destruction of neighbourhoods, the negative impacts of hundreds of trucks a day through the neighbourhood, dust, the destruction of properties and businesses, loss of recreation space, stress, and loss of sleep and health problems. Some residents will experience impacts for several weeks, some for four or more years and some permanently.

Of particular concern is the impact of noise from construction, particularly after hours work, including Utilities Work and truck movements. Due to noise impacts, some residents continue to experience sleep disturbance over many nights over years. Residents have been forced to employ strategies such as temporarily re-locating during weekend work. Some residents are being affected by noise from being in proximity of more than one construction site.

Out of hours work has had the most debilitating effect on residents during M4 East demolition and construction phases. In particular, Utilities Work is routinely out of hours work. All utilities work for M4-M5 link must have the same conditions of approval for work hours as Construction. All work must be done Monday to Friday during business hours and Saturday morning.

Local residents are reporting a significant number of breaches of M4 East approval conditions by contractors. Both the impact of the breaches and the effort involved in reporting breaches, further depletes the energy of residents who are suffering from the impact of years of living in close proximity to construction zones.

There are overlaps in the construction periods of the proposed M4-M5 link and the New M5 and M4 East of up to one year. This will significantly worsen impacts for residents close to construction areas. No additional mitigation or compensation is detailed in the EIS for residents for these periods. It is unacceptable that residents should have these prolonged periods of exposure to more than one project.

The EIS never attempts to seriously evaluate what the total cumulative impact of this devastation will be on the community. The EIS makes does not seriously research the current impacts on and lived experiences of residents of the M4 East construction, measure what the cumulative impacts would be or make concrete suggestions that would substantially mitigate the cumulative impact of these prolonged periods of construction noise exposure.

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

There should be no above ground construction in Haberfield and Ashfield

The M4-M5 Link EIS highlights two options for above ground civil and/or tunnel construction sites in Haberfield and Ashfield, option A and option B, with three sites proposed as part of each option.

However, there is a lack of transparency about these “options,” as hidden in the detail of the EIS is the possibility that up to six construction sites will be used in Haberfield/Ashfield. The potential of there being up to six construction sites has been confirmed in discussions at WestConnex “information” sessions with members of Save Ashfield Park.

Instead of above-ground construction sites, tunneling should occur completely underground using the newly created M4 East tunnel and stubs as the access point for the M4-M5 link.

All construction sites and residual land should be remediated and returned to the community at the end of construction of the M4 East.

Local residents were promised during the M4 East EIS assessment and approval process that if the next stage of WestConnex were approved and commenced, the fit out of the exhaust stack site on the Parramatta Road Ventilation Facility (opposite Bunnings), and the use of the ‘blind portal’ entry and entrance surface ramps along Wattle St, Haberfield between Parramatta Rd and Ramsay St, would be the ONLY sites used for above ground construction in Haberfield.

Local residents were promised that upon completion of the WestConnex Stage 1 (M4 East project) in 2019, that is was both feasible and reasonable that they would not have to endure any further above ground construction associated with WestConnex Stage 3.

Impacts of spoil removal and other traffic should be minimised

Local residents are impacted by 100s of truck movements per 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.

Spoil removal from the Ashfield/Haberfield end of the proposed M4-M5 link should occur underground via the M4 East tunnel.

Within the EIS, there is specific mention of the major impact of Option B upon all streets off Parramatta Rd from Walker Avenue to Chandos St, Haberfield and Ashfield due to the proposed Parramatta Rd West and Parramatta Rd East sites. There is further specific mention of major impacts within this zone, particularly along Bland St, up from Parramatta Rd to Denman Avenue, Haberfield. A major concern is that three main entrances to Haberfield Public School are located on Bland St, between Parramatta Rd and Denman

Avenue, Haberfield. The EIS specifically mentions that substantial extra traffic on Alt and Bland streets Haberfield could affect road safety for children at Haberfield Public School.

The EIS proposes a spoil haulage route along Liverpool Road through Ashfield shopping centre. This is an extremely busy shopping centre and making it a trucking route is unacceptable. It would have a negative impact on pedestrian road safety, create traffic congestion and chaos and impact substantially on local business through the likely creation of more clearways.

The Inner West Council has identified that many roads in Haberfield and some in Ashfield will be subject to "rat-running," causing an unfair noise and traffic burden on local residents.

Improved plans for pedestrian and cycling activity and connectivity.

This EIS should include an increased focus on the Haberfield/Ashfield/Five Dock regions and include improved plans for pedestrian and cycling activity. In particular, the project should improve the links across Wattle St/City West Link between Haberfield and Five Dock (potentially including an overpass to ensure safety of students and families who cross here to get to/from school), and create more pedestrian/cyclist crossings across Parramatta Road.

There should be no further compulsory acquisition of homes, commercial property or greenspace.

There should be no further compulsory acquisition of homes, commercial property or greenspace. 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.

The indicative nature of the EIS is unacceptable

The EIS repeatedly states '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.'

For this reason alone, NSW Planning must not approve this project as it does not contain any certainty for residents as to what is proposed and therefore provides no proper basis on which the project can be approved. The indicative nature of the EIS is fundamentally unfair and is a breach of proper process. Residents do not have the opportunity to make comment on the final design of the project and are deliberately not being fully informed. It is not a true consultation process as residents do not have an opportunity to understand the full implications of the project.

If the EIS is approved, it prepares the pathway for sale of the Sydney Motorway Corporation to the private sector. If this privatisation goes ahead, the new owners and its contracting companies will be handed responsibility for oversight and control of the final design and implementation of the M4-M5 Link.

The contractor would not be bound to take into account community feedback. Give that the contractor will be trying to deliver the project as quickly and cheaply as possible, it is likely that any additional measures canvassed in the EIS with respect to construction noise mitigation, for example, would not be adopted.

The EIS should not be approved on the grounds that it does not provide a reliable basis on which to base the approval documents.

The Preferred Infrastructure Report should be made available for public comment

A Preferred Infrastructure Report (PIR) is currently being written by the M4-5 Link project team. The PIR should be publicly released - with extended exhibition and submission period - PRIOR to any assessment or approval of the M4-5 Link.

The Preferred Infrastructure Report will document detail that should have been properly documented in the EIS. It will reveal plans that will have massive impacts upon residents and community. The PIR is particularly relevant to Haberfield and Ashfield as it will provide detailed information about the above-ground construction sites to be used in Haberfield and Ashfield. The EIS does not stipulate the number and detail about the construction sites that will be used in Haberfield/Ashfield, rather highlighting two "options".

The EIS does not seriously consider alternatives

Under the Secretary's requirements, the EIS is supposed to provide an analysis of alternatives, including potential public transport alternatives (SEARS 2 (e)). The EIS fails to meet this requirement. There is broad brush discussion about the need for the project without any detailed analysis of why other solutions including the one developed by the City of Sydney could not be pursued. Given the billions involved in this project, a detailed analysis of potential alternatives should be required.

WestConnex is a fundamentally flawed white elephant

The construction of all stages of WestConnex is opposed because:

- of the destruction of local homes, vegetation, green-space and neighbourhoods
- of the ongoing noise, vibration, dust and other impacts of WestConnex construction across many suburbs which will continue at least until 2023
- in the short-term it will displace traffic onto local roads as motorists seek to avoid tolls
- in the medium-term it is likely that the tollway will experience traffic congestion, due to induced traffic
- induced traffic which will result in increased air pollution and contribute to global warming
- exhaust stacks are unfiltered and air pollution build-up occurs at tunnel entry/exit portals. In-tunnel filtration is required.
- public transport is far more efficient method of transportation with much less impact on health and the environment.
- it is a very poor use of tax-payers' money, which would be much better spent on improving public transport, health, support for people in need and education.

The Minister for Planning should not approve the application

The Secretary of NSW Planning should advise the Minister for Planning to not approve this EIS.

We request that Save Ashfield Park's submission be published in accordance with the undertaking on your website, and that a written response be provided to each of the objections raised.

Save Ashfield Park

