

Expanded Comments on the M4 East Motorway Design Concept

17 February 2014

Southern Sydney Regional Organisation of Councils

WestConnex Delivery Authority
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Via email: info@westconnex.com.au

Dear Board Members

Following further consultation with our member Councils, the Southern Sydney Regional Organisation of Councils (SSROC) seek to extend upon the submission previously forwarded to you in relation to the Stage 1 M4 East Motorway Design Concept (Westconnex). Please accept this revised submission in place of the original.

Southern Sydney Regional Organisation of Councils (SSROC) is an association of sixteen local government Councils formed for mutual benefit through collaboration and cooperation. Member Councils deliver and maintain in excess of \$20 billion in local infrastructure and other assets across an area covering more than 600 square kilometres, with a population approximately one quarter of the population of greater metropolitan Sydney.

WestConnex passes through several of our local government areas and has significant implications for our inner-west members including Leichhardt, Marrickville, Ashfield, Burwood, City of Canada Bay and City of Sydney Councils.

In October 2012, SSROC's response to the NSW Long Term Transport Master Plan supported the reprioritization and localisation of road infrastructure funding to include sub-regional assessments and upgrades of road infrastructure and traffic assets, preventing and relieving pinch points and enhancing road safety for all users - including private vehicles, freight vehicles, public transport, cyclists and pedestrians. We also noted our support for the revitalisation of the Parramatta Road corridor as public transport and active transport thoroughfares with reduced private vehicle access.

SSROC generally does not support development of new road infrastructure for the purposes of solely enabling capacity for private vehicles, but accepts that the Westconnex may provide opportunities to improve integrated land use and transport planning and enable much-needed economic revitalisation of the densely populated inner west. It may also have particular benefits for the Parramatta Road arterial by providing an alternative route for vehicles - particularly heavy vehicles - accessing the Airport/Port Botany precinct, thus making the local road network safer, more effective and potentially less congested, with increased capacity for public transport services. Indeed, these were among the key benefits proposed by Infrastructure NSW when it proposed the WestConnex development, and reiterated by the NSW Government in the Long Term Transport Master Plan and Metropolitan Strategy.

SSROC agrees with the NSW Government that Parramatta Road is the heart of the inner west and a vital arterial connection for Greater Sydney, which as a 'City Shaper' presents significant opportunities to shape how the city functions. Under the Metropolitan Strategy, the WestConnex is expected to revolutionise Parramatta Road by:

- Delivering improved road connections through the WestConnex motorway to create better links local centres,
- Delivering stronger east-west and north-south connections along and across Parramatta Road,
- Creating high quality places and spaces at key points along and adjacent to Parramatta Road,

- Planning for well-designed housing including smaller dwellings to create a higher population density to stimulate business and retail investment, and
- Planning for a viable and frequent public transport service along the corridor

The WestConnex project is somewhat unique – it is not intended as just another road infrastructure project. Councils and their residents, particularly in the inner-west, have a legitimate interest in being part of the decision-making processes around the WestConnex and revitalisation of Parramatta Road. There are a number of issues identified below that we wish to raise with you in relation to the overall project.

2. Key Issues

The lack of detailed planning available at this stage makes it difficult to comment on the proposed development. Undoubtedly the project will have major environmental, social and economic impacts for the communities involved. Until the preferred alignment for tunneling and related openings is known, there will continue to be considerable community concern. We are conscious that, for the reported 100 or so households in the Homebush, Haberfield, Concord and Ashfield areas that may lose their homes, it is a particularly anxious and frustrating time.

As no detailed traffic modelling data has been released for the Stage 1 component or indeed for the completed project the following comments are assumptions based on the current known traffic conditions along Parramatta Road. At present, traffic volumes on Parramatta Road at the Concord/North Strathfield end of the M4 motorway are in the vicinity of 100,000 vehicles per day. By the time the traffic reaches the Dalhousie Street/Parramatta Road junction this volume has reduced to around 55,000 vehicles per day.

Ashfield is particularly concerned that The Stage 1 concept plans propose two tunnel portals in the Ashfield LGA – one adjacent to Ashfield Park and the other near Reg Coady Reserve adjacent to the City West Link Road. The Parramatta Road portals will accommodate two lanes of traffic into and out of the tunnel and on the City West link Road one lane in and out. Given the current scenario at the end of the M4 is it reasonable to assume that at the conclusion of the Stage 1 works traffic volumes in the Ashfield LGA are likely to rise substantially as the M4 ‘traffic dump’ will have shifted 5 kilometres further east.

The impact of placing eastern tunnel portals in Ashfield will attract more through traffic to the LGA both to and from the tunnel. Consequently, there is likely to be greater surface road impacts throughout the Council area, as Ashfield becomes a new ‘tunnel access’ destination.

Councils are concerned about the localized impacts of the motorway corridor being used as the conduit for construction-generated traffic.

2.1 Traffic Demand Modelling

Concerns about traffic demand modelling stem from the use of data from the Bureau of Transport Statistics that exclude projections associated with urban renewal, which was intended to be at the heart of the WestConnex scheme. Without consideration for the increased demand on the area that would occur as a result of improved accessibility, liveability and amenity on and around Parramatta Road, the traffic demand modeling may be significantly undermined.

Other flagged infrastructure projects such as a second Sydney Airport based in the western suburbs would also impact on the performance of the WestConnex. SSROC argues that such a scenario should be included in the traffic demand modelling alongside a more comprehensive transport network analysis.

Councils to be impacted by the project including Leichhardt, Marrickville, Ashfield, Burwood, City of Canada Bay and City of Sydney ask that traffic modelling comprises all state, regional and collector roads and local streets.

In addition to this, Ashfield Council in whose LGA two of the tunnel portals are expected to be constructed specify that modeling should include the following:

- All state, regional and collector roads and local streets north of Parramatta Road within the Ashfield LGA
- All state, regional and collector roads, and local streets south of Parramatta Road, including Croydon Road, Bland Street, Liverpool Road, Elizabeth Street and Sloane Street.
- Key state roads and collector roads south of Liverpool Road including Milton Street, Holden Street, Queen Street.
- The Longport Street /Carlton Crescent/ Smith Street, Summer Hill locality.
- All local streets potentially affected by 'rat runs' between collector roads.

The modelling should also identify impacts to public transport operations both during construction and post construction of the Stage 1 works. Should any changes be proposed to existing public transport routes, or new public transport routes/links be created, the modelling must identify such changes and impacts arising from the changes.

2.2 Coordination between project components

The WestConnex Project is a combination of two key components, the Urban Revitalisation Project and the Motorway Expansion Project. Much of the urban revitalisation project is dependent upon traffic network changes that will result from the construction of the motorway; however there appears to be little coordination between the motorway's construction timeline and the implementation timeline for urban revitalisation.

SSROC contends that the teams responsible for these components need to work alongside each other rather than in isolation to ensure that the Westconnex does not end up being just another road project.

SSROC looks forward to evidence of collaboration between project teams in the Urban Revitalisation Project report that is due to the Government in March 2014. Specifically, we seek assurances that urban revitalisation projects will not be sidelined by the construction period due to the pressure on existing arterials during this time and instead will occur concurrently.

Should the construction period result in delays to the revitalisation works, we seek to know when the works will commence and what impact the delay would have on the sufficiency of the budget for revitalisation (\$200 mil or 1/60th of total project cost). Will it still be sufficient, and if not, what will the Government do to rectify the situation?

In addition, SSROC member Councils with links to Parramatta Road seek to work with the NSW Government as part of an intergovernmental approach to the development of the Parramatta Road Corridor. SSROC notes that the City of Canada Bay has reported a collaborative and effective working relationship with Urban Growth NSW to date, with the City of Canada Bay Mayor convening meetings with the Central Precinct Councils to foster a joint approach with Urban Growth NSW.

2.3 General lack of Information

While SSROC supports the development of the WestConnex insofar as it provides the stated advantages identified by the NSW Government, we have some concerns about the extent to which the planning for the WestConnex is being done 'on the run' and without adequate regard for the outcomes of community consultations. A detailed, clear and transparent Community Engagement Strategy needs to be developed for the entire project

While we appreciate that a number of consultations are being held between December 2013 and February 2014 on the M4 East Concept Plan giving voice to concerned residents, businesses and Councils, there appears to be very little detail available in the planning to date which might provide clarification and understanding of the likely impacts of either the roadworks or completed project on residential amenity, business viability and overall social and economic outcomes.

SSROC understands that there is significant concern in the community about compulsory land acquisition and compensation in relation to a number of residential properties as well as doubt in relation to actual traffic volume reductions on Parramatta Road and subsequent capacity for meaningful urban revitalisation. To this end, a value capture mechanism should be developed to ensure both the positive and negative impacts of the proposal are equally balanced.

SSROC understands that Leichhardt Municipal Council is awaiting response from the WestConnex Delivery Authority and WestConnex Urban Revitalisation project in relation to the following issues summarised below.

a. WestConnex Urban Revitalisation project:

Information pertaining to:

- i. Studies, designs and assumptions that informed the project preparation;
- ii. Scenarios in relation to residential densities, land use mix and population;
- iii. Identification of locations being considered as Urban Activation Precincts along the Parramatta Road corridor; and
- iv. Implementation timetable(s).

b. WestConnex Motorway development:

Information pertaining to:

- i. testing of various toll scenarios and their impact on surface traffic volumes;
- ii. mode share assumptions and measures proposed to achieve the proposed mode share; and
- iii. density assumptions for designated “investigation areas”
- iv. additional modelling and analysis of the WestConnex Motorway should be undertaken that takes into account the following:
 - a. forecast population levels associated with the urban revitalisation project including geographic distribution;
 - b. a series of land use revitalisation scenarios that examine a variety of land use scenarios along the corridor (including a scenario which maintains existing densities in the eastern section of Parramatta Road);
 - c. reductions in width of Parramatta Road between Hawthorne Canal and Camperdown to one through lane and one public transport lane in each direction;
 - d. the ‘constrained case’ for Sydney Airport (as discussed in the Joint Study on Aviation Capacity for the Sydney Region) in combination with a new major airport in Sydney’s western suburbs; and
 - e. locations under consideration for Urban Activation Precincts in the inner-west.

There are also doubts about the future traffic volumes on Parramatta Road and capacity of the WestConnex to provide sufficient volume reductions to allow for capacity increases for active and public transport modes and streetscape improvements. These elements are critical to the project’s objectives, including:

- delivering improved connections through the WestConnex motorway to create better links to local centres;
- delivering stronger east-west and north-south connections across Parramatta Road;
- creating high quality places and spaces at key points along and adjacent to Parramatta Road; and
- planning for a viable and frequent public transport service along the corridor.

2.4 Environmental and Social Impact Assessments

It is critical that the environmental and social impacts of the WestConnex proposal are rigorously and systematically considered in the assessment process for this major roadway. There are significant physical and mental health implications associated with major roadways, and in the inner west there are specific concerns in relation to air quality, noise and vibration and heritage conservation.

a. Air Quality Impacts

Without the appropriate technical information it is unclear what actions will be taken to mitigate air pollution around the project, particularly in the vicinity of the tunnel ventilation stacks which are likely to be in the Ashfield LGA. It is reasonable to assume that the proposal is likely to generate air quality concerns for local residents and there is justifiable community concern over this public health issue given the experience of other Sydney communities that live near such stacks.

In a previous submission to the Department of Planning and Infrastructure, Ashfield Council stated that an EIS should *“identify best practice options for tunnel filtering in current use for projects of a similar scale to the Stage 1 works, including ‘vehicle emissions filtering’ mechanisms for the tunnel exhaust systems. Any option for not using a ‘vehicle emissions filtering’ mechanism must show the position of exhaust vents, the number of properties that will be affected by emissions, and the degree of impact of those emissions on public health. Such an option must also provide evidence-based data of appropriate scientific rigour to support no ‘vehicle emissions filtering’ mechanism for the Stage 1 works. The EIS must include details of the position of exhaust vents, their heights, and visual treatments and the proposed method of exhausting vehicle emissions.”*

b. Noise and Vibration Impacts

It is noted that tunnelling is expected to be undertaken on a 24 hour basis. Noise and vibration issues can have considerable impacts on sleep patterns and mental health in the general community, and particularly for shift workers.

Noise and vibration arising from construction and following completion of the Stage 1 works has the potential to create significant amenity impacts for adjoining and nearby properties in the vicinity of tunnel portals, construction depots and along the spoil haulage routes.

SSROC considers that the following issues require detailed analysis and assessment:

- Defining ‘sensitive receivers’ along the route (residential properties, schools, aged care, hospitals, commercial, parks, heritage properties, etc) and applying appropriate mitigation measures.
- Background noise data recording of ‘sensitive’ locations along the corridor – i.e. establishing baseline data and predicted noise levels.
- Traffic survey counts around proposed portal locations.
- ‘Out of hours’ noise and vibration impacts – i.e. where it may be necessary for capacity and safety considerations to undertake some activities at night.
- Increased traffic noise around tunnel portals and major construction depot sites.
- Vibration impacts on nearby buildings and other structures in close proximity to the tunnel construction works.

c. Heritage impacts

Ashfield Council notes that there are a number of sensitive and significant areas of heritage significance within its boundaries that may be impacted by the proposed tunnel and eastern portals including Ashfield Park, Haberfield and the state significant property Yasmar. Without any supporting information that examines the heritage impacts of the project, it is unclear how the project can proceed without compromising these sites, including heritage significance, preservation of historic fixtures and impacts on landscaping.

d. Reduced community health outcomes

It is critical that the health impacts of the WestConnex proposal are rigorously and systematically considered in the assessment process for this major roadway. There are significant implications for community health associated with major roadways. These include:

- Increased danger from traffic – implications for the community’s health (especially vulnerable groups)
- Loss of open space – green space is crucial to human health; loss of parkland will mean that there is less space for both passive and active recreation
- Impact on business and local economic outcomes
- Changes to pedestrian, cycle and vehicular access resulting in community severance and dislocation – particularly around Haberfield and Ashfield
- Increased rates of depression and other mental health impacts, particularly for those at risk of losing their homes and businesses or experiencing amenity impacts as a result of construction;
- Reduced neighbourhood amenity – poor social outcomes, increase in anti-social behaviour and crime.

e. Visual Amenity and Urban Design

Although the proposal is only in concept form at this stage it is nevertheless important to identify the significant visual impacts the proposal will have on the urban form. Portals and their ‘land cuttings’ for the associated entry and exit laneways, for example, have the potential to create a poor visual setting, for adjacent residential areas.

Vehicles using entry and exit laneways are also likely to create high levels of noise for adjoining properties, including nearby residences. The following details must therefore be carefully evaluated before the final design and location of this infrastructure is determined:

- the design and visual impact of any noise screening walls or devices.
- how any residual areas which are part of the portal/roadway works will be treated and designed.
- how any visually exposed parts of the portal/slip lanes will be visually screened, such as side walls.
- landscaping treatments around the portal sites and entry/exit laneways.

The above details will be crucial in evaluating the most appropriate location for major infrastructure components of the proposal such as portal and slip lane locations and ventilation stacks.

f. Hydrology and Flooding

Ashfield Council notes that the area of the eastern tunnel portal adjacent to the Dobroyd Canal at Haberfield is a low-lying area that could impact on the tunnel openings. In addition, the construction of new portals and other infrastructure on ramps, culverts and bridges has the potential to disrupt current local flood flows. Consequently, a detailed hydrology and flood impact assessment will need to be undertaken for project.

g. Impacts on Council

Works that are required to be constructed to ameliorate the impacts of new additional regional traffic travelling through local government areas will create an ongoing cost burden for Councils. Therefore, the EIS should provide indicative examples and extent of the type of treatments required, make an estimate of their construction costs, and identify how the NSW Government intends to implement those works.

Some Councils may seek funding from Roads and Maritime Services in order to develop Local Area Traffic Management Plans in order to manage the impacts of the project on their LGAs.

h. Consultation

Consultation processes thus far have identified significant community frustration about the perceived lack of information about the project. This is the largest road project in Australia, and there will undoubtedly be significant impact on communities, businesses and households.

Councils expect that they will be fully involved in the preparation of the EIS and given adequate notification in relation to meetings or feedback. Some Councils may need to engage consultants for the purposes of reviewing the local traffic and parking impacts and develop Local Area Traffic Management Plans. Similarly, communities will need ample time to be educated and consulted.

It is therefore recommended that the exhibition period be increased to two months minimum. This would allow for public meetings and feedback sessions, analysis of technical reports and reporting to Council. It is also recommended that, during this time, the Westconnex Delivery Authority conduct public meetings across all affected LGAs with the appropriate technical staff in attendance.

3. Conclusion

The provision of timely information in relation to the development of the WestConnex is of considerable importance to our region. We reiterate the importance of the Westconnex motorway expansion project and urban revitalisation project working closely together to achieve the priorities set out for Parramatta Road and its surrounds under the Metropolitan Strategy.

Finally, we stress the importance of community consultation in regard to the development of the Westconnex and impact mitigation and abatement strategies as well as active community participation in relation to the redevelopment of Parramatta Road. As Councils are best placed to assist the NSW Government in engaging our constituents, we expect to be full participants in consultation and decision making processes.

We hope you find these comments useful and look forward to your response in relation to these matters.

Yours sincerely



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