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1.0 INTRODUCTION

The City of Canada Bay (CCB) welcomes the opportunity to respond to the M4 East WestConnex Tunnel Project Environmental Impact Statement (hereafter referred to as the EIS). Council generally supports the WestConnex tunnel project and the modifications to the M4 Motorway. The estimated improvements in traffic flow on the M4 and reduction of travel times will be very welcome and have the potential to bring environmental improvements to the area. However Council wishes to ensure these environmental improvements are realised and that the amenity of the Canada Bay Local Government Area (LGA) is not detrimentally affected by the project during construction and during operation of the tunnel.

In the past two years, Council has been actively working with WestConnex to ensure the best outcome for the users of the new transport route and those living, working and playing in the vicinity. This collaboration has resulted in a very satisfactory outcome for the Cintra Park Hockey and St Luke’s sporting precinct for the end users. To ensure a similar outcome is achieved for the community residing in close proximity to the network, we have analysed the EIS and prepared the following comments. Council has engaged GSA Planning to work with an internal group of Council experts formed from the following disciplines: Traffic and Transport; Engineering; Place Planning; Parks Management; Community Development; Health, Building & Environment (hereafter referred to as Council’s Investigation Team).

Council’s Investigation Team has liaised with local residents and has identified 15 major concerns which are summarised below and detailed in this submission.

1. Projected traffic flows on local roads must consider LGA population increases.
2. Projected level of service at certain intersections is totally unsatisfactory.
3. Construction worker’s parking needs to be resolved.
4. Emergency ventilation stacks’ air quality and frequency of use must be specified.
5. Dust and vibration during construction needs to be stated.
6. Noise barrier locations and design is unclear.
7. Acoustic treatments for noise-affected dwellings, business and schools which cannot benefit from noise walls requires review.
8. Cintra Park Tunnel Plant location adjacent to residents is undesirable.
9. Relocated bus stops need resolution
10. Connections between Alexandra Street and Edward Street severed, needs to be reconnected
11. Alternative transport during and post construction needs to be identified.
12. Proposed parks have inadequate access and functionality
13. Pedestrian routes to Parramatta Road from Concord Road via Interchange parks are inappropriate.
14. Relocation measures for Public Housing residents are not stated.
15. Water quality and use of Council’s Water Harvesting System at Cintra Park during construction needs review.

Council’s Investigative Team has also identified a number of secondary concerns, which include the following: impacts on businesses, shops and services in the area; inadequate measures proposed to deal with the resumption and relocation of residents; Council to review infrastructure to be transferred to Council’s stewardship; Tunnel Emergency Management Plan must be provided to Council; changes to Council’s street lighting should utilise LED lamps; landscaping to soften edges near the Concord Road Interchange; replacement Morton Bay Fig trees for St Luke’s Park; lack of connectivity to pocket parks around the interchange; specific trees and heritage locations that need to be considered before demolition and construction commences; heritage items and streetscapes recorded prior to demolition; and youth use of pocket parks near Interchange.

This document is divided into five (5) sections. Section 2 provides the context of the M4 East WestConnex Tunnel Project in the City of Canada Bay; Section 3 details the major concerns identified by Council and residents associated with the project; Section 4 details the Council’s secondary concerns; and Section 5 concludes the report.
2.0 THE M4 EAST WESTCONNEX TUNNEL PROJECT IN THE CONTEXT OF THE CITY OF CANADA BAY

This section briefly describes the location, character, history and expected growth rates for the City of Canada Bay Council Area. The M4 East WestConnex Tunnel Project and the Tunnel Project Sites within the CCBC Area are briefly described as well.

2.1 The City of Canada Bay

2.1.1 Location
The City of Canada Bay Local Government Area (LGA) is located in the inner-western suburbs of Sydney, about 6-12 kilometres from the Sydney GPO, and is bounded by the Parramatta River in the north and east, the Municipality of Ashfield, the Burwood and Strathfield Council areas in the south and the Auburn Council in the west. The City encompasses a total area of 20 square kilometres, including many parks, reserves and foreshores.

The City of Canada Bay includes the suburbs of Abbotsford, Breakfast Point, Cabarita, Canada Bay, Chiswick, Concord, Concord West, Drummoyne, Five Dock, Liberty Grove, Mortlake, North Strathfield, Rhodes, Rodd Point, Russell Lea, Strathfield (part) and Wareemba (see Figure 1).

![FIGURE 1: Canada Bay Council Area](image)

Source: profile.id, 2015
2.1.2 Character
The CCB is a predominately residential area, but also has significant retail, commercial, industrial and open areas with the water of the Parramatta River proudly the backdrop to the LGA. The features in the LGA include Birkenhead Point Shopping Centre, Rhodes residential areas and Shopping Centre, Yaralla Estate (Dame Eadith Walker Hospital), Concord Repatriation General Hospital, Concord Golf Club and many parks and reserves. The City is served by the Western Motorway, Parramatta Road and the main northern railway line.

2.1.3 Early History of CCB
The indigenous inhabitants of the Canada Bay area were the Wangal clan of the Eora Aboriginal people. European settlement dates from 1793, with land used mainly for farming. The Longbottom Stockade on Parramatta Road was used for Convict work gang accommodation. Residential growth took place during the late 1800s and early 1900s, aided by improved access and industrial growth. Significant development occurred during the post-war years.

2.1.4 Predicted Population Growth
Recent growth has been largely due to the redevelopment of previous industrial sites for residential developments, particularly medium and high density housing. Population growth is expected to continue, especially in the Rhodes Peninsula and Breakfast Point areas. Between 2015 and 2036, the population for the CCB is forecast to increase from 87,241 in 2015 to 120,761 in 2036 (see Figure 2). This is an increase of 33,520 persons or 38.42% growth. Council is very aware the increased population will generate more traffic with increased pressure on roads, intersections and public transport in the CCB. This population projection is independent of additional traffic generated by the M4 East Tunnel Project.

![FIGURE 2: Forecast Population Growth]

Canada Bay Council Area
Source: profile.id, 2015
2.2 M4 East Tunnel Project

This section describes the M4 East Tunnel Project in the context of the CCB. The M4 East Tunnel Project includes widening of the existing M4 Motorway to four lanes in each direction and construction of twin tunnels which connects the M4 to the City West Link, as part of the WestConnex infrastructure project. The City plays an important role in the M4 East Tunnel Project with two of the nine construction sites being within the City area. Approximately one quarter of the tunnel length is within the City of Canada Bay area (see Figure 3).

These construction sites are, inter alia:
- Concord Road Entry and Exit Point to the tunnel and associated works, known as the Concord Road Interchange
- Cintra Park Tunnel Site which will provide construction access to the tunnel

![FIGURE 3: Construction Sites within the Council Area](Source: WestConnex Website, 2015)

The effects of these construction sites and the associated impacts on nearby residents, traffic flows and open space will be discussed in the following sections.

2.2 Tunnel Project Sites within the City of Canada Bay Council Area

2.2.1 Concord Road Interchange

Council’s concerns are associated with construction traffic interfering with existing traffic along Parramatta Road, Concord Road and Sydney Street, the locations of noise walls and the proposal of open space and parks in this area (see Figure 4). These concerns and their implications on the LGA will be discussed in this submission.

![FIGURE 4: The Proposed Concord Road Interchange](Source: WestConnex Website)
2.2.2 Concord Road Interchange Construction Site
The Concord Road Interchange Construction Site is a major site for the project and is situated within CCB (see Figure 5). Resumption of land has been required in order to provide the required tunnel entries and exits, and connections to Concord and Parramatta Roads.

![FIGURE 5: The Proposed Concord Road Interchange Construction Site](Image)

Source: M4 East Environmental Impact Statement

2.2.3 Cintra Park Tunnel Site
The Cintra Park Tunnel Site is the main tunnelling entry point for the project and is situated within CBC area (see Figure 6). Council’s concerns are associated with, construction traffic interfering with existing traffic along Parramatta Road and Gibbs Street, on-site parking and the possibility of effects on air quality and noise in this area. These concerns and their implications on the LGA will be discussed in this submission.

![FIGURE 6: The Proposed Cintra Park Tunnel Site Location](Image)

Source: M4 East Environmental Impact Statement
3.0 MAJOR CONCERNS

Council has identified 15 major concerns resulting from the M4 East WestConnex Tunnel project that will affect local roads and functions within the CBC. This section will outline the Major Concerns and where appropriate, Matters requiring Clarification and Potential Options that may resolve the concerns. For these major concerns at least one reference in the Environmental Impact Statement (EIS) to the particular concern has been identified. Council requests involvement in the consultation and decision-making specified within this section.

3.1 Projected Traffic Flows on Local Road Network

3.1.1 Council’s Concerns

Council is particularly concerned regarding the potential impact of additional traffic on the local road network where population increases are expected due to the rezoning of land in Concord West and surrounding areas for higher density living (EIS reference – Vol. 1A, p. 8-2). In addition, there are two new schools which are not yet operating at full capacity which may increase traffic issues during peak hour vehicular trips. As well, the six scenarios presented in the EIS do not necessarily accurately represent the project outcomes. Rather, they comment on un-planned scenarios which do not form part of the WestConnex project.

3.1.2 Matters for Clarification

Council requests a detailed analysis of the potential traffic impacts on local road networks within the LGA. It would be beneficial for WestConnex to consult with Council on mitigation measures which will improve the predicted performance of key intersections within the LGA. Council considers baseline figures should include the predicted increases in population growth due to land re-zonings to residential and two new schools, in addition to the expected increases in traffic, generally.

The following sections will further clarify Council’s concerns and will discuss matters to be considered before the project commences.

3.2 Projected Level of Service at Intersections

There are two important intersections identified in the EIS as likely to have major Level of Service (LoS) failings (EIS Reference - Vol. 1A, p. 8-16). Council is concerned that these particular intersections will increase delays as well as interfere with other intersections as a result of queuing.

Intersection of Parramatta Road and George Street

3.2.1 Council’s Concerns

Additional traffic through Parramatta & George Street intersection (see Figure 7 on the following page) due to:

- Closure of Concord Road northbound slip lane onto the M4 westbound.
- Closure of Parramatta Road eastbound access to the M4 westbound near Concord Road.
- Diversion of Leicester St northbound traffic & M4-westbound traffic on Parramatta Road to new Powell’s Creek on ramp.

The Parramatta/George Street intersection is predicted to have:

- Average delay increases from 177 seconds to 228 seconds in 2031 AM peak.
- No works to increase capacity at intersection.
- Queuing managed by limiting the capacity of traffic to gain access from surrounding intersections.
3.2.2 Matters for Clarification

It is unclear whether the EIS modelling consider two new schools which are not yet operating at full capacity; and the approved rezoning to high density residential in Concord West which has not yet been redeveloped?

3.2.3 Potential Options

Upgrading the intersection of George Street and Parramatta Road or providing alternate access points to the M4 to limit additional traffic reaching this intersection, could be further considered.

Intersection of Concord Road and Patterson Street

3.2.4 Council’s Concerns

- Concord Road/Patterson Street intersection will have increased delays as a result of the project, which may extend to Gipps Street.
- Delays will potentially interfere with upstream intersections and result in queuing on the northbound off-ramp of the project (see Figure 8).
- Proposal to manage queuing by limiting the capacity of traffic from surrounding intersections.
3.2.5 Potential Options
Further upgrades to the intersection of Concord Road and Patterson Street should form part of this project to increase LoS and reduce queuing.

3.3 Construction Worker Parking

3.3.1 Council’s Concerns
The Cintra Park work site carpark where the majority of light vehicles, site-workers and office staff are expected to park is in the vicinity of several community facilities car parks (see Figure 9).

Concerns are expressed regarding construction workers or site visitors’ use of the above-named public recreational facilities car parks, which are already heavily used during the week. The EIS states that 250 car spaces will be provided for construction workers at the Cintra Park Tunnelling Site (EIS Reference - Vol. 1A, p. 6-48). Access will be available via Gipps Street. Council estimates that the existing site can only provide 196 spaces, which is a shortfall of 54 car spaces. The location of nearby community centres is summarised below.

A. The Concord Children’s Centre and Concord Meals on Wheels carpark is approximately 400m north of the Cintra Park tunnelling site.

B. The Concord Community Centre is used seven days per week with the majority of those using the Centre arriving in private vehicles or the community-bus. Retaining car parking for community/resident use of the Centre is required. It is approximately 150m from the Cintra Park tunnelling site.

C. Cintra Park Tennis Centre car park is opposite the Cintra Park site.

D. The Five Dock Leisure Centre free car park is on the boundary line of the Cintra Park precinct, immediately adjacent to the Cintra Park tunnelling site. It is approximately 400m from the Cintra Park tunnelling site. The car park is currently at capacity at peak times in the day/week.

A Construction Management Plan has not yet been released. Notations ‘A’ to ‘D’ show the locations of the centres and notation ‘E’ shows the location of the Cintra Park Tunnel Site carpark in Figure 9.

FIGURE 9: Car Parks near the Cintra Park Tunnel Site
A Concord Children’s Centre  B Concord Community Centre
C Cintra Park Tennis Centre  D Five Dock Leisure Centre
E The proposed site worker parking
Source: Google Maps
- Council requests that the existing trees and pedestrian overpass on the Cintra Park Tunnel Site be retained.
- In view of the State Heritage significance of the site and the potential for Aboriginal and early European Heritage relating to the Longbottom Stockade, Council has concerns regarding the extent of construction and excavation on the site.
- Council wishes to view any preliminary plans for the site and discuss the potential impacts on the surrounding road network and function of the sport grounds.
- Council also requests that consultation with WestConnex occurs prior to commencement of the car park and that any Traffic Management and Safety Plan be available for Council, community and stakeholders associated with the sporting facilities for comment and discussion.

On the basis that only 196 car spaces will be provided Council also has concerns regarding the adequacy of site parking provisions, generally, and on weekends when sporting fields and facilities are alternatively used. The likely project worker parking demands to ensure the provision is adequate and the impact on parking availability in the surrounding area minimised:

- Less than 50 of the 196 parking spaces provided in an upgraded carpark on the northern side of Concord Oval are likely to be available to WestConnex workers on Sundays. This appears unlikely to satisfy the demand from WestConnex workers on Sundays.
- Only 50 spaces available at Railway Lane are likely to be available on Sundays.

3.3.2 Matters for Clarification
The design and location of the entry/exit points and whether the second entry/exit point on Loftus Road will be utilised, and the shortfall of 54 car spaces requires clarification.

3.3.3 Potential Options
Concerns to be addressed in the Construction Management Plan include management of site compound vehicular access points during peak worker start and finish times where volumes are likely to spike.

Council also requests WestConnex require the Contractor to issue directives to staff, construction workers and site visitors during induction that no parking can occur in those community facilities, as part of the induction process, and issue regular reminders to that effect. Council would expect the opportunity to comment on Construction Management Plan when released.

3.4 Emergency Use of Ventilation Stacks
3.4.1 Council’s Concerns
Council has concerns regarding emergency use of ventilation stacks. The EIS is unclear as to whether Cintra Park ventilation stack will be used for exhaust air in the event of an emergency. If this is the case, Council has concerns regarding the air quality from the emergency ventilation stacks, particularly with regard to frequency of use and safety of the exhausted air (EIS Reference - Vol. 1A, p. 5-31 and p. 5-38). Council is principally concerned about the effects on active and passive recreation on nearby playing fields and the effects on short and long term health of nearby residents.

3.4.2 Matters for Clarification
Council requests an explanation of:

1. What constitutes an ‘emergency’;
2. Detailed descriptions of scenarios which would trigger the use;
3. The composition of the exhausted air and its dispersal rates, and
4. The design of filtering systems.

Council has concerns that the emergency ventilation stacks would be used during heavy traffic incidents within the tunnel to control the build-up of vehicle exhaust emissions in the tunnel.
3.5 Dust and Vibration during Construction

3.5.1 Council’s Concerns
The dust and other impacts on the children of Lucas Garden Public School on the corner of Queens Road and Walker Street, a school for children with disability and special needs to be particularly considered (EIS Reference - Vol. 1A, p. 8-16 and p. 11-7). The school is within 150m of the Cintra Park Tunnel Site.

3.5.2 Matters for Clarification
Council requests the Construction Management Plan to be available for public comment and Council review prior to implementation. Dust and vibration will cause nuisance to the inhabitants, and workers of the surrounding neighbourhood including nearby schools and public facilities from windblown dust, debris, noise and the like during the works.

With regard to dust, Council requests:
1. Dust screens be erected around the perimeter of the site and be kept in good repair for the duration of the work.
2. All dusty surfaces must be wetted down and any dust created supressed by a fine water spray.
3. Water used for dust suppression must not be allowed to then enter the stormwater system.
4. All stockpiles of materials that are likely to generate dust must be kept damp or covered.

All precautions must be undertaken to prevent damage to surrounding properties as a result of excavation or vibration as a result of the works. Where damage occurs all necessary repairs are to be the responsibility of WestConnex.

3.6 Noise Barrier Locations & Design

3.6.1 Council’s Concerns
The road widening and land resumptions will expose some residents near the Concord Road Interchange to road noise, where previously there had been limited exposure (EIS Reference - Vol. 1A, p. 10-1). Residents have concerns regarding increased road noise from general traffic and compression braking.

3.6.2 Matters for Clarification
1. Noise walls can reduce the impacts of road noise including tyre noise and compression braking. The residents of Carrington St have requested a sound wall along the south-eastern edge of the dive structure which Council deems reasonable (see Figure 10).
2. Additionally Council requests the south-eastern edge of the dive structure be mounded and planted to further reduce noise impacts and improve visual amenity.
3. Consideration may be given to low noise road surfaces in the area near dwellings and signage to remind truck drivers to avoid compression breaking.

FIGURE 10: Location of Noise Walls near Concord Road Interchange
Source: City of Canada Bay
3.7 Acoustic Treatments of Noise-Affected Buildings

3.7.1 Council’s Concerns
The road widening and land resumptions will expose some residents near the Concord Road Interchange to road noise, where previously there had been limited exposure. Some dwellings might not be protected by noise walls. Construction noise may have impacts on the Lucas Garden School and businesses near the Cintra Park Tunnel Site.

3.7.2 Matters for Clarification
Council requests a list of locations where noise treatments will be applied to buildings, in particular dwellings in the Queens Lane slip-road into Sydney Street and the Lucas Garden School which has the potential for greater traffic noise nuisance and cannot benefit from noise walls.

3.8 Cintra Park Tunnel Plant relocation

3.8.1 Council’s Concerns
Council is of the understanding that the Cintra Park playing fields which have been resumed as part of the tunnel project will be eventually returned to Council. The EIS shows tunnel plant on the eastern side of Cintra Park adjacent to residential dwellings (EIS Reference - Vol. 1A, Figure 5.21). The tunnel plant has the potential to cause loss of amenity to residents: potential noise amenity and visual amenity, since it backs onto residential dwellings (see Figure 11).

3.8.2 Matters for Clarification
Council seeks clarification regarding the location of the facilities proposed.

3.8.3 Potential Options
Council requests consideration be given to relocating tunnel plant adjacent to existing Council plant on the western side of Cintra Park, adjacent to the Concord Oval Eastern grandstand (see Figure 12). This would remove any amenity issues for residents. Relocating tunnel plant to the western side of Cintra Park would provide suitable area for two junior soccer fields on the site, which is a more efficient use. Council anticipates a densely planted screen of minimum 8 metres width would be required along the boundary with residents.

**FIGURE 11:** Proposed facilities layout of Cintra Park post-construction
*Source: Google Maps*

**FIGURE 12:** Suggested facilities layout of Cintra Park post-construction
*Source: Google Maps*
3.9 Relocation of Bus Stops

It is proposed as part of the Tunnel Project to relocate bus stops on Concord Road in order to coordinate with alterations to roadways (see Figure 13). The EIS has proposed several changes to locations and consolidation of bus stops (EIS Reference - Vol. 1A, p. 8-18 and p. 6-47).

Bus Stops along Concord Road – Eastern Side

3.9.1 Council’s Concerns

No details regarding relocation three bus stops on Concord Road and it appears two bus stops on the east side of Concord Road will be consolidated into one.

Bus Stops along Concord Road – Western Side

3.9.2 Council’s Concerns

A bus stop looks to be relocated to the intersection of Carrington Street. It appears the current left turn only onto Concord Road will be closed. Council does not support this closure. It would limit the opportunity for long vehicles to manoeuvre and/or perform a U-turn within Carrington Street (see Figure 13).

The length of the proposed bus pull in area appears to be insufficient to accommodate a bendy-bus and the required draw-in and a draw-out length, which means bendy-buses, would block traffic on Concord Road when stopped.

![Figure 13: Proposed Relocated Bus Stops on Concord Road](Image)

**FIGURE 13: Proposed Relocated Bus Stops on Concord Road**

Source: M4 East Environmental Impact Statement

3.9.3 Matters for Clarification

Council seeks clarification on how bendy-buses will be accommodated at the western side bus stop.

3.9.4 Potential Options

In consideration of the concerns regarding pedestrian access to this location and the absence of a notable origin/destination at the proposed location, both the eastern side bus stops could be relocated to just north of Patterson Street.

It is recommended that the western side bus stop should have sufficient pull in length to accommodate a bendy-bus.
3.10 Connections between Streets severed

3.10.1 Council’s Concerns
The reduced linkages require U-turns and these can be particularly difficult for garbage trucks/large vehicles. Additionally, there is an increased risk of anti-social behaviour in cul-de-sacs (see Figure 14).

![Figure 14: Potential linkage of Proposed Cul-de-sacs](Source: WestConnex Website)

3.10.2 Potential Options
Linking Alexandra Street with Edward Street, similar to existing would be preferred. Linking roadways would also provide improved passive surveillance, and reduce the risk of antisocial behaviour.

Proposed Cul-de-sac on Sydney Street near Thornleigh Street

3.10.3 Council’s Concerns
The proposed cul-de-sac may result in safety issues at the intersection, anti-social behaviour within the cul-de-sac and does not appear to be required to provide access (see Figure 15).

![Figure 15: Cul-de-sac Location](Source: M4 East Environmental Impact Statement)
3.10.4 Potential Options
Council suggests the intersection of Sydney Street and Thornleigh Street could be constructed as a 90 degree corner, i.e. no longer a T intersection, and without a cul-de-sac. A driveway could provide vehicular access to affected properties.

Carrington Street Closure at Concord Road

3.10.5 Council’s Concerns
Council is concerned that the proposal to close Carrington Street will prevent longer vehicles from performing a U turn where it intersects Concord Road will cause issues for garbage truck movements (see Figure 16).

3.10.6 Matters for Clarification
Clarification is required as to the necessity for the road closure. Council does not support the closure of Carrington Street at Concord Road.

![FIGURE 16: Cul-de-sac Location](Source: M4 East Environmental Impact Statement)

3.11 Alternative Transport During & Post Construction
The EIS provides the daily estimated number of construction vehicles accessing the WestConnex work sites (EIS Reference - Vol. 1A, p. 6-44). It is estimated in Table 6.20 of The EIS that 260 heavy vehicles and 80 light vehicles will use a combination of Parramatta Road, the M4 Motorway, Concord Road and Sydney Street to access the Concord Road Civil Tunnel Site. The EIS also estimated that 330 light vehicles will use Gipps Street and 200 heavy vehicles will use Parramatta Road and Gipps Street to access The Cintra Park Tunnel site.

3.11.1 Council’s Concerns
Council is concerned that the proposed cycleway diversion route provided in the EIS in Figure 6.19 is insufficient and not functional for long term use. Figure 17 on the following page shows the various types of cycle ways in the vicinity and areas where the work sites affect existing cycle paths.
3.11.2 Potential Options
It is important for commuter and recreational cyclists that safe access alternatives are provided around the construction sites. Council requests a revision of the proposed cycleway diversion route for this area. Consideration should be given to clearly marked routes which separate cyclists from Construction Traffic, for the duration of the works. Appropriate and safe cycle paths are required, post construction.

3.12 Proposed Parks have Inadequate Access & Functionality
3.12.1 Council’s Concerns
The Concord Road Interchange shows four areas of potential open space (WestConnex Website). These areas would require pedestrian access across busy roads and do not have parking or facilities. Due to the lack of connectivity and parking, Council would prefer the centre area of the Concord Road Interchange not be public accessible (see Figure 18 on the following page).

3.12.2 Potential Options
Council suggests instead the area become greenspace which is mounded and densely planted with canopy, screening and understorey planting. As low maintenance areas, it would be managed and maintained by RMS. The greenspace would provide visual amenity to motorists and nearby residents.

Council would prefer instead as open space, the area over the roof of the dive structure for passive use. As noted elsewhere, Council would request noise-walling, mounding and planting along the south-eastern edge along Sydney Street.
Pedestrian Access: Western side of Concord Road

3.12.3 Council’s Concerns

The access provisions for pedestrians along the west side of Concord Road appear to be reduced by the project (see Figure 19).

3.12.4 Potential Options

Consideration be given to maintaining pedestrian access along the western side of Concord Road to as far south as Sydney Street. Pedestrians who wish to reach Parramatta Road would need to cross safely at the proposed Patterson Street intersection.
3.13 Pedestrian Routes to/from Parramatta Road

Pedestrian Access: Concord Road South bound

3.13.1 Council’s Concerns

The at-grade pedestrian crossing where westbound traffic on WestConnex merges to Concord Road southbound is considered very dangerous for pedestrians (EIS Reference - Vol. 1A, p. 6-44). Council does not support a crossing due to vehicles speed and the grade/curvature of the roadway. Council instead supports continuation of the proposed footpath which runs along the east side of Concord Road and around perimeter of the on-ramps (see Figure 20).

![Diagram of Concord Road South Bound Pedestrian Access](image)

**FIGURE 20: Proposed Residential Access Route for Concord Road South Bound**

*Source: WestConnex Website*

3.13.2 Potential Options

Council recommends that pedestrian access not be provided through the Concord Road Interchange. The proposed route is generally unattractive for pedestrians, requiring multiple road crossings. Council considers the pedestrian bridge from northern side of existing M5 to the eastern most central open space area to be counter-intuitive to pedestrian movement through the area.

Council suggests the proposed bridge be eliminated and the pedestrian path on the eastern side be continued further south, to link the end of Alexandra Street to the end of Ada Street and to the Parramatta Road / M4 intersection to meet with Parramatta Rd (see Figure 21 on the following page). Council considers the traffic signals at Mosely St would provide a better pedestrian experience down to the station than amongst all the proposed roads.
3.14 Relocation of Public Housing Residents

3.14.1 Council’s Concerns
Council has concerns regarding social support mechanisms described for the residents of two Public Housing Estates who will be relocated due to land acquisition (EIS Reference - Vol. 1A, p. 5-57 and p. 11-27). Land resumption and relocation of public housing residents is a challenging issue for those who lose their homes and neighbourhood networks, and needs to be dealt with in a sensitive manner. The uncertainty of forced relocation can induce stress in the elderly.

Retaining a diverse mix of housing types for social housing in the local area including private, accessible, social, and affordable housing allows existing residents to retain connections to their local communities and employment. Disruption to affected residents should be minimised by staging relocations so they move only once. Relocated residents should retain access to hospitals, shops, public transport, schools and community facilities.

3.14.2 Matters for Clarification
Council requests the social support mechanisms be reviewed and improved, as it is Council’s opinion the measures proposed are unresolved and unsatisfactory.

3.15 Water Quality & Use of Council’s Water Harvesting System

3.15.1 Council’s Concerns
Council is very concerned the construction of the Tunnel Project will dewater the ground on which Council is dependent for its base flow to the existing water harvesting system (EIS Reference - Vol. 1A, p. 6-64). The proposal includes WestConnex utilising the Council Water Harvesting System at Cintra Park which is used for irrigation of nearby sporting fields.

3.15.2 Matters for Clarification
WestConnex must replace the base flow with the same quality water delivered from their water treatment system. WestConnex must guarantee the continuance of a base-flow of 10 litres per second of the same quality of water Council currently receives. Council cannot accept saline water, or dissolved contaminates which could build up in Council’s sports fields.
4.0 SECONDARY CONCERNS

As outlined previously, Council’s Investigation Team has also identified secondary concerns from the impacts of the M4 East WestConnex Tunnel project that will affect the CCB. These concerns will be discussed in this section.

4.1 Economic Impacts

Council is concerned whether there will be adequate businesses to support the influx of workers in the area or the effects on local economy post-construction. The statement has not identified which specific shops and services will be affected by construction works, also when amongst construction stages they will be affected (EIS Reference - Vol. 1B, p. 14-17). Accessibility and residents’ safe access to shops and services have not been addressed. Whilst bus stop changes were generally addressed in relation to accessibility, the changed locations have not been addressed in relation to local businesses’ operations.

Economic impacts have been largely deferred to a Business Management Plan, which is yet to be developed. This does not assist Council in gauging whether WestConnex has considered adequate mitigation measures for the local economy both during and after construction.

Council suggests specific economic mitigation for the area (aligned to Parramatta Road Transformation) could be included in the economic impact statement. Council requests the Business Management Plan be developed as priority and be made available to community and Councils for review.

4.2 Relocation of Residents

Council has concerns regarding social support mechanisms described for the 129 people in Concord Precinct who will be relocated due to land acquisition (EIS Reference - Vol. 1A, p. 11-27 and p. 11-28). Land resumption and relocation of residents is a challenging issue for those who lose their homes and neighbourhood networks, and needs to be dealt with sensitively. Council requests the social support mechanisms be reviewed and improved, as it is Council’s opinion the measures proposed are inadequate.

4.3 Infrastructure intended to be transferred to Council’s Control.

Any infrastructure intended to be transferred to Council’s stewardship shall be identified at Concept design stage and submitted to Council for their consideration. In accordance with the Public Works Act, Council may choose not to accept accommodation works necessary for the construction of the WestConnex. Any infrastructure that is acceptance to Council for transfer shall be constructed to Council’s satisfaction.

4.4 Tunnel Emergency Management

Council requests WestConnex have an emergency management plans for traffic diversions in place in the event of a tunnel closure. WestConnex must provide resourcing to implement and manage the diversions of traffic both on Parramatta Road and traffic diverted onto the local road network of CCBC. Council requests these plans be provided to the Local and district Emergency Management Committees.

4.5 Street Lighting

All streets affected by the WestConnex project must be provided with street lighting. The lighting must be designed and erected to meet the Australian Standards for Public Lighting. WestConnex shall ask whether Council will take ownership of the street lighting Infrastructure and if Council declines the infrastructure ownership must be transferred to the Street Lighting Service provider (currently AUSGRID). All street lighting for which Council will pay for the energy consumption costs must utilise LED lamps.
4.6 Landscaping

The proposed batters to the outside edges of the road areas near the Concord Road Interchange will need to be planted to soften those edges (EIS Reference - Vol. 1A, p. 11-28). Canopy trees only will not be sufficient. Elsewhere, planting for screening of views of substations and stormwater treatment areas and the rear view of noise walls, will be required.

New planting should be indigenous to the Canada Bay area. Council staff would welcome the opportunity to assist WestConnex with species selection, if required.

Where existing Moreton Bay Fig trees have been removed in the vicinity of St Luke’s Park, Council requests replacement planting of advanced Morton Bay Fig trees.

The central circular parks proposed of the Concord Road Interchange are preferred as mounded and heavily planted, non-accessible areas, as discussed previously in this submission.

4.7 Aboriginal heritage

Aboriginal heritage in CCB is believed to be limited to remnant Turpentine forest within the Queen Elizabeth Reserve. This area is not within close proximity to construction works planned and therefore is not likely to be affected by the tunnel project.

4.8 European heritage

Council has identified general mitigation measures that will preserve significant elements of particular heritage items that are to be demolished as part of the project and also, provide a record of significant aspects of the local heritage for Council’s purposes.

The Powell’s Estate Conservation Area, and in particular, heritage items identified in Council’s LEP, (see Figures 22 and 23 on the following page) needs to be photographed and recorded prior to demolition. This includes taking photographs of the interior, exterior and grounds of the heritage items. WestConnex is requested to provide hard and electronic copies to Canada Bay Council and Canada Bay Local History Library.

Council requests demolition contractors be encouraged to retain original significant elements of buildings for reuse within the local government area, in particular within the Powell’s Estate Conservation Area.

It is requested that the proposed Interpretation Plan and the draft Construction Heritage Management Plan be prepared in consultation with Council’s Heritage Officers and that the draft be made available to Council for comment prior to finalisation.
In terms of environmental heritage, it is essential the trees in Concord Oval (Heritage Item I308) be protected from damage during construction works. In all aspects of heritage conservation and demolition Council should be invited to provide input into the identification of opportunities to enhance conservation options of archaeological and heritage sites.

The outlines of the Stockade and farm site are still visible as the boundaries of St. Luke’s and Cintra Parks (see Figure 24 on the following page). The EIS considers the impact to the site moderate to major but only if relics associated with the Longbottom Stockade are identified. Please see Annexure A for Council’s detailed heritage comments.
4.9 Youth Facilities

The proposed path linking Concord Rd, Sydney Rd, Edward St, Alexandra St and Parramatta Rd will require street-lighting and street furniture, and (see Figure 25). If sufficient space is available, the area under the ramp heading towards Parramatta could be programmed for youth use. Council suggestions include a basketball court or street skate area.
4.10 Public Art

Noise walls can present opportunities for public art can present, rather than a blank face to roadways and pocket parks. Decorative or stylised noise wall panels can contribute to the public art of CCB, with the involvement of artists in panel designs (see Figure 26).

FIGURE 26: Examples of Noise Wall Panels
Source: City of Canada Bay

CCB’s Public Art Plan nominates themes such as Intercultural community, Memories of Freedom and Incarceration, and Aboriginal Heritage, in the Concord Area. Integrated artworks offer a long term presence and have the scope and resourcing to develop highly original and distinctive responses to landscape, sites and cultural environments.
5.0 CONCLUSION

We are grateful for the opportunity to prepare this submission in response to the M4 East Tunnel EIS through the CCB. This submission has highlighted Council’s general support for the project as a benefit to residents, ratepayers and commuters who travel through the LGA.

However it is the major concerns which Council has identified that require urgent consideration before the project proceeds.

As stated previously, the major concerns are these:
1. Projected traffic flows on local roads must consider LGA population increases.
2. Projected level of service at certain intersections is totally unsatisfactory.
3. Construction worker’s parking needs to be resolved.
4. Emergency ventilation stacks’ air quality and frequency of use must be specified.
5. Dust and vibration during construction needs to be stated.
6. Noise barrier locations and design is unclear.
7. Acoustic treatments for noise-affected dwellings, business and schools which cannot benefit from noise walls requires review.
8. Cintra Park Tunnel Plant location adjacent to residents is undesirable.
9. Relocated bus stops need resolution
10. Connections between Alexandra Street and Edward Street severed, needs to be reconnected
11. Alternative transport during and post construction needs to be identified.
12. Proposed parks have inadequate access and functionality
13. Pedestrian routes to Parramatta Road from Concord Road via Interchange parks are inappropriate.
14. Relocation measures for Public Housing residents are not stated.
15. Water quality and use of Council’s Water Harvesting System at Cintra Park during construction needs review.

Council’s Investigative Team has also identified a number of secondary concerns which include the following: impacts on businesses, shops and services in the area; inadequate measures proposed to deal with the resumption and relocation of residents; Council to review infrastructure to be transferred to Council’s stewardship; Tunnel Emergency Management Plan to be provided to Council; changes to Council’s street lighting to utilise LED lamps; landscaping to soften edges near the Concord Road Interchange; replacement Morton Bay Fig trees for St Luke’s Park; lack of connectivity to pocket parks around the interchange; specific trees and heritage locations that need to be considered before demolition and construction commences; heritage items and streetscapes recorded prior to demolition; and youth use of pocket parks near Interchange.
Annexure A: The City of Canada Bay Council - Heritage Comments
Non Aboriginal Heritage Impact

Comments on Historical Overview
These comments relate to Section 4 Historical Overview of the Non-Aboriginal Impact Assessment in Volume 2H of the M4 East Environmental Impact Assessment, September 2015.

- Section 4 provides a good understanding of the historical development of the area.
- There appears to be a minor mistake on page 4-56. The gates in the Figure 4.52 are not located in Loftus Street but appear to be those near the War Memorial in Queen Elizabeth II Park.

Comments on Historical Archaeological Assessment

HAMU4
- It is accepted that this area has little archaeological potential given previous disturbance and that buildings of a similar period remain in other areas, as well as sufficient other historical resources, to demonstrate the historical development of the City of Canada Bay Local Government Area.
- It is accepted that the proposed M4 East works will have a moderate to high adverse impact on potential archaeological resources.

HAMU5
- It is accepted that this area has little archaeological potential given previous disturbance and that buildings of a similar period remain in other areas, as well as sufficient other historical resources, to demonstrate the historical development of the City of Canada Bay Local Government Area.
- It is accepted that the proposed M4 East works will have a moderate to high adverse impact on potential archaeological resources.

HAMU6
- This HAMU encompasses the gates to the former villa “Thornleigh House”. These gates are required to be removed in order to accommodate road widening.
- This HAMU encompasses the street trees in Sydney Street (listed as heritage item no. 431 in Canada Bay Local Environmental Plan 2013).
- It is accepted that the proposed M4 East works will have a major impact on the “Thornleigh House” gates and former driveway.

HAMU7
- This HAMU encompasses much of the Powell Estate Heritage Conservation Area.
- This HAMU encompasses the former grounds of the large Federation house at 10 Thornleigh Avenue (listed as heritage item no. 461 in Canada Bay Local Environmental Plan 2013).
- This HAMU encompasses the street trees in Sydney Street (listed as heritage item no. 431 in Canada Bay Local Environmental Plan 2013).
- It is accepted that the proposed M4 East works are likely to have a moderate adverse impact on potential archaeological resources.

HAMU8
- This HAMU encompasses St Luke’s Park gateway/entrance and trees (listed as heritage item no. 308 in Canada Bay Local Environmental Plan 2013).
- The proposed M4 East works could disturb potential archaeological resources associated with the Longbottom Stockade. (See extract of Figure 5.8, Volume 2.8 of the M4 East Environmental Impact Assessment.)
- The works also have the potential to affect trees and other plantings in Concord Oval.
Heritage Items and Conservation Works

- The proposed M4 works will require the demolition of a large number of contributory buildings in the Powells Estate Conservation Area, effectively changing the boundaries of the Conservation Area.
- The proposed works will affect the setting of the Powells Estate Conservation Area.
- The following heritage items are proposed to be demolished:
  - 11 Sydney Street, North Strathfield (item 433)
  - 23 Sydney Street, North Strathfield (item 434)
  - 64 Concord Road, North Strathfield (item 108)
- The following heritage items are proposed to be partially demolished:
  - Wesley Uniting Church and Hall, 81 Concord Road, North Strathfield (item 99)
  - Street trees, Sydney Street (item 431)
  - Street trees, Edward Street (item 182)
- The setting of a number of heritage items will also be affected.
- There is the potential for the proposed works to affect the trees in Concord Oval (northern care parking area). The gates will not be affected.

Comments on Heritage Impact Assessment

- The demolition of more than a quarter of the Powells Estate Conservation Area would have a dramatic, irreversible, and adverse impact on the Conservation Area, and raises issues about the need to re-assess the significance of the area and the nature of future development in the area.
- The demolition of heritage items will result in the complete loss of their heritage values.
- The partial demolition of heritage items will result in the loss of some of the heritage value of these items.
- The low brick front fence on the Concord Road boundary of the church will also be impacted by the works.
- The adverse impacts of the setting of the heritage items in the area will affect the heritage values of these places.
- The trees in Concord Oval should be required to be protected from damage during the works.
Comments on General Mitigation Measures
These comments are made with regard to Section 7.1 of Volume 2H of the *M4 East Environmental Impact Assessment*.

1. Council should be invited to provide input into the identification of opportunities to enhance the conservation options for archaeological sites and heritage listed places.
2. New development should be required to comply with the heritage controls in Canada Bay Development Control Plan. Appropriate landscaping is a key consideration.
3. The Construction Heritage Management Plan referenced in Section 7.1 has not been able to be found and it is assumed that this is a document proposed to be prepared. It is recommended that the draft Construction Heritage Management Plan be made available to Council for comment prior to finalisation.
4. It is recommended that the proposed Interpretation Plan be prepared in consultation with Council and that the draft be made available to Council for comment prior to finalisation.
5. Archival photographic recording of heritage items to be demolished or partially demolished and of the Sydney Road streetscape in the Powell Estate Conservation Area be undertaken. The interior, exterior and grounds of the heritage items should be comprehensively photographed. A hard copy and electronic copy of the recordings should be given to Canada Bay Local History Library.
6. Elements of heritage fabric of buildings to be demolished in the Powells Estate Conservation Area should first be offered for no cost to owners of retained houses in the Conservation Area in cases where the elements can be used to replace similar original elements which are missing.

Mitigation Measures for Specific Sites

**Wesley Uniting Church and Hall, 81 Concord Road, North Strathfield**

7. The proposed M4 works will considerably affect the setting and entry to the Church grounds, as well as the entry gates to “Thornleigh”. The reduced area around the church buildings as well as the increased traffic noise has the potential to adversely affect the use of the place by the Church community. Careful consideration also needs to be given to the appropriate new location for the historic gates and face brickwork front fence, and the affect of any acoustic screening on the setting of the church building. The Church community has limited resources to address these matters and assistance should be provided, including financial assistance.

8. A landscape plan which addressed issues associated with changes to the lot resulting from the road widening should be prepared for the grounds and submitted to Council for approval. The landscape plan, prepared in discussion with the owner and Council, should be included in the Construction Heritage Management Plan.

9. Acoustic screens located near the church should be carefully designed to limit their adverse impact on the visual setting of the church. Consideration should be given to “green walls” and attractive surface treatments.

**House, 10 Thornleigh Street, North Strathfield**

10. The landscape buffer proposed in the EIS may not be the most appropriate way to protect the curtilage of the house. It does to some extent ameliorate the impact of the removal of the group of trees at the corner of Concord Road and Patterson Street however may not be the most appropriate response. The approach to reducing the impact of the road widening on the setting of the house should be discussed with the property owner. It may be that an acoustic wall, perhaps in the form of a “green” wall, or one screened by planting, may be more appropriate.

11. A plan for the area should be developed in consultation with the owner and Council and should be included in the Construction Heritage Management Plan.
House, 99 Concord Road, North Strathfield
12. The mitigation measures recommended for this property are relocation of the existing front fence and re-establishment of a front garden. However a simple moving back of the garden and fence may not be the most appropriate response to road widening.
13. A landscape plan for the area should be developed in consultation with the owner and Council and should be included in the Construction Heritage Management Plan.

Works area in Concord Oval
14. The proposed use of the northern end of Concord oval to access the construction work tunnel has the potential to impact the trees and potential archaeological remains in this area. Insufficient information has been provided in the EIS in order to be able to determine the possible extent of the impacts.
15. It is recommended that, prior to the preparation of a Construction Heritage Management Plan, an archaeological excavation of the site be undertaken to determine the extent of potential archaeological remains and appropriate measures for their protection put in place.
16. It is recommended that the access road for the construction site on Concord Oval be located so as to avoid damaging the trees in the car parking area to the north of the playing field.

Potential heritage items identified in Table A.2 of Appendix A, Volume 2H of the M4 East Environmental Impact Assessment
17. Places identified in Table A.2 as potential heritage items and which are to be demolished should be archival recorded by a comprehensive collection of photographs of the interiors, exteriors and grounds. A hard copy and electronic copy of the recordings should be given to Canada Bay Local History Library.