

Cr Nicole Johnston

Councillor for Tennyson Ward



Tel (07) 3403 8605
Mail 180 Fairfield Road, Fairfield, QLD 4103
Email tennyson.ward@bcc.qld.gov.au
Web www.nicolejohnston.com.au

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Project Manager – Cross River Rail project
Coordinated Project Delivery
Office of the Coordinator-General
PO Box 15517
City East Qld 4002 Australia

crr@coordinatorgeneral.qld.gov.au

Dear Sir / Madam

Re: Cross River Rail revised Environment Impact Statement (Project Change)

I am writing to lodge a submission to the State Government's proposed Cross River Rail project in response to the revised Environmental Impact Statement (EIS), dated February 2017, released for public consultation.

The Cross River Rail project terminates on the southern edge of the Brisbane City Council Ward I represent, and will directly and indirectly impact on a number of suburbs including Fairfield and Annerley and potentially others.

While the intention of the project is generally supported, there are strong community concerns about numerous operational impacts including haulage methods and routes, working hours, noise, dust and vibrations.

The changed project no longer includes desperately needed station upgrades to Yeronga, Yeerongpilly and Fairfield and other stations along the Beenleigh route. I urge the State Government to reconsider these vital upgrades and deliver them as part of the Cross River Rail project.

I also remain concerned that the frequency of rail services for southsiders along the Beenleigh Line may not improve under the changed project scope.

The problems surrounding the delivery of the Airport Link Tunnel a few years ago provide clear and strong lessons on the need to carefully plan and supervise execution of the project, should it go ahead, to minimise the impacts on the local residential and business community. While residents recognise the importance of the project, they are keen to ensure that the social fabric of community remains intact, strong and vibrant and that local amenity is not sacrificed for operational efficiency.

There are very real and often distressing impacts for residents where communities are cut or dislocated by major rail projects such as the Cross River Rail project.

1. Spoil removal by rail not truck

The revised EIS notes that not all of the five proposed spoil dumping sites would be used for spoil disposal. The failure to confirm which of the five sites will be used for

spoil haulage creates uncertainty and unacceptable risk around use of the local road, pedestrian and cycling networks in Tennyson Ward.

An estimated 628,000 cubic metres of spoil or 65% of the total spoil will be removed from the three southern worksites, all of which might potentially impact on local roads in Tennyson Ward.

The adverse impacts caused by 24 hour a day truck haulage over the five year life of the project is the most significant and detrimental aspect of the proposed EIS. Local roads including Annerley Rd, Kent St, Ipswich Rd, Fairfield Rd, Noble St, Home St and Cornwall St are already under enormous capacity pressure and the addition of several hundred truck movements per day, every day for five years is unconscionable and ill-conceived.

In particular, there is no safe crossing point to Dutton Park Station across Cornwall St between Annerley Rd and Kent St. With workers vehicles, and spoil trucks from two of the five work sites using this route it would be an unacceptable safety risk.

This is a key pedestrian and cycling route for Annerley residents to access Dutton Park Station, Dutton Park State School and the hospital precinct.

Pedestrians including children will be put at risk without a safe crossing point, preferably a green walk signal or over/underpass, at the intersection of Annerley Rd and Cornwall St, Annerley

This should be undertaken as a temporary measure to safely manage construction impacts and a permanent solution devised with Brisbane City Council to ensure safe, long term pedestrian and cyclist crossing points is created at the intersection of Cornwall St at Annerley Rd to provide access to Dutton Park and the new Boggo Road Station.

Figure 6-1 pg61 shows truck movements from the Dutton Park Rail Station worksite area within the rail corridor using Noble St and presumably Fairfield Rd but this is not reflected in any of the construction worksite information or truck routes. This needs to be clarified. Noble St, Home St and Fairfield Rd should not be utilised as truck haulage routes.

The revised EIS refers to the creation of a short right hand turn lane at Peter Doherty Drive Dutton Park. Any right hand turn lane should not detract from the two lanes of through traffic (ie should be additional) and should not require resumption from Gair Park, as it is a significant war memorial park in the district.

A better solution, as there is an existing right turn slip lane, is that trucks enter the Boggo Rd worksite via Boggo Rd and exit via Peter Doherty Drive (however rail is preferred). This would minimise through traffic congestion impacts on Annerley Rd and major choke points at Gladstone Rd and Cornwall St to the south.

It is noted in the changed project that trucks will not be turning right out of Boggo Rd past Dutton Park State School but will be directed to a left turn onto Annerley Rd with a haulage route via Annerley Rd, Cornwall St and Ipswich Rd. Trucks will then pass through four busy school crossing points servicing five schools along the Ipswich Rd corridor (Junction Park State School, Mary Immaculate Catholic Primary School, Our Lady's College, Yeronga State High School and Yeronga State School). These are the intersections of:

- Annerley Junction (Ipswich Annerley Rd/Waldheim St) and Ipswich Rd/Dudley St;
- Green walk crossing Ipswich Rd, Mary Immaculate Catholic Primary School;
- Ipswich Rd/Villa St/Cracknell Rd; and
- School Rd/Ipswich Rd.

While one school is protected from passing truck movements five others will have students at risk when crossing Ipswich Rd at the four above key school crossing points.

The removal of spoil by truck is not supported. This is an incredibly wasteful and invasive form of removal that will cause major detriment to the local community, impact on the amenity of residents through increased noise and dust, create major safety and congestion impacts on local roads including Kent St, Cornwall St, Annerley Rd, Noble St, Fairfield Rd and Ipswich Rd (as well as the Ipswich Motorway) and cause long term damage to road surfaces.

This method of removal should be conditioned as a key component of the project. Incentives should be offered to tenderers to design and deliver an innovative, world class spoil removal system (loading and conveyance) via the existing rail network. This would also assist to reduce the impact of the project's carbon footprint, as well as significantly mitigating the impact of the project on the local community and road network.

All loading of spoil should be done undercover in an acoustic shed to reduce dust, vibration and noise impacts.

Recommended changes:

- 1. rail rather than truck spoil removal;**
- 2. all spoil removal to be loaded under acoustic warehouse cover; and**
- 3. restricted hours of operation of spoil removal from 6.30am - 6.30pm 6 days per week;**
- 4. right turn in to Boggo Rd worksite via existing slip lane at Boggo Rd and exit out of Peter Doherty Dve;**
- 5. all rail spoil loads to be covered with a lid.**

2. Infrastructure Upgrades

- Heffernan Park, Annerley

The Cross River Rail project should include a playground and landscaping upgrade to Heffernan Park, Annerley in return for suffering through five years of construction impacts, particularly when the most intense noise, dust and vibration impacts will be borne by the residential community around this park.

- Dutton Park Station and access

As noted above, the revised EIS should be a positive opportunity to improve the short term (construction) and long term pedestrian and cycling interface at the southern end of the Cross River Rail project near Dutton Park Station.

A permanent solution should be devised in conjunction with Brisbane City Council to ensure a safe, long term pedestrian and cyclist crossing point is created at the intersection of Cornwall St and Annerley Rd to provide access to Dutton Park and the new Boggo Road Stations. Currently there is no zebra crossing or green walk signal at this busy intersection. A green walk signal would be preferable.

There is no point improving rail services, if you do not improve safe access to those rail services.

The relocation of Dutton Park Station to the south of its existing positions is not supported as no pedestrian and/or road upgrades are proposed to support the new location. The new station access points are unclear.

Detailed design plans for station access must be released for public consultation.

For example there is no green arrow at the left turn land from Annerley Rd into Noble St Annerley/Fairfield.

An elevator to increase universal access to Dutton Park Rail Station is required. Please investigate whether any temporary construction parking could be retained as rail station parking in the longer-term at the southern portal worksite.

- Pedestrian and Cycling Connectivity

Pedestrian and cyclist access to the new PA hospital underpass from Cornwall St is unclear. A dedicated pedestrian and cycling pathways need to be installed off Cornwall St between Annerley Rd and Kent Street to connect to the PA hospital underpass and the new Park Road Rail Station.

Recommended actions:

- 1. immediately release detailed design plans for access to new Dutton Park Station extension;**
- 2. a pedestrian crossing upgrade to Cornwall St between Annerley Rd and Kent St, Annerley for provide safe access to Dutton Park and Boggo Rd stations;**
- 3. create a pedestrian cycling link from Cornwall St to the PA hospital underpass and Boggo Rd Station;**
- 4. elevator for Dutton Park Station; and**
- 5. playground upgrade for Heffernan Park, Annerley.**

3. Project Operating Hours and Noise/Vibration

The Revised EIS pp67-68 notes that noise and vibration exceedances of up 17 decibels during day and night time workers will occur north of Park Road railway station adversely impacting on residents in Annerley and Fairfield in Tennyson Ward.

The proposed project operating hours are extensive and should be scaled back to minimise the adverse noise and dust impacts for residents. Many residential households are located directly along the proposed key traffic routes, and those properties together with neighbouring properties will be adversely affected by the noise of 24 hours truck spoil removal and project works.

No surface works should be allowed at all on Sundays or public holidays, with rail spoil removal allowable for tunneling works only.

Any associated or incidental truck movements should be limited to any approved operating hours of 6.30am to 6.30pm. Strict penalties should be included in the project conditions for any breach of operating hours by people or truck movements.

Operating hours should be mandated to include the arrival of the workforce after 6.30am and departure of the workforce by 6.30pm. No activities should be allowed outside these hours including arrival of the workforce for a 6.30am shift start, which mean noise much earlier (from around 5.30am) as the site opens and gears up and construction staff should vacate all work sites by 6.30pm. Some reasonable exceptions could be made for project management staff.

As previously outlined, I do not support spoil removal by truck nor 24 operating hours.

The EIS outlines the project's significant noise, dust and vibration impacts on the community. Numerous aspects of the projects and site locations are forecast to provide decibel readings in excess of statutory health and safety guidelines.

A mandatory scheme should be conditioned to provide affected households with actual decibel/vibration readings prior to project works commencing and forecast decibel readings during construction. Following complaints from residents, verification readings should be taken and any breach of the noise levels conditions should result in strict financial penalties to project and compensation for affected residents and businesses.

Conditions should be mandated to provide options to temporarily relocate or to install appropriate mitigation measures for residents or business that will be permanently affected by project noise/dust or vibration during the life of the project.

In the case of tunneling works, where noise/vibration will affect residential properties temporary relocation measures should be offered if blasting or tunneling exceeds noise limits.

Recommended actions:

- 1. above ground works and spoil haulage hours of operations limited to 6.30am – 6.30pm six days per week excluding Sunday;**
- 2. a complaints action system when noise, dust and vibration;**
- 3. regular noise, dust and vibration testing;**
- 4. temporary relocation if noise, dust and vibration available to residents if standards cannot be met; and**
- 5. house washing to remove dust on an agreed basis;**

4. Enforcement and Support

The local community is extremely concerned to ensure that the problems associated with the delivery of the Airport Link project are not replicated on the Cross River Rail project. They are a similarly highly urbanised environment. Most critically the State Government must take responsibility for the actions of their contractors' onsite and impose clear guidelines and penalties for any non-compliance with project conditions. Flexibility should be retained in the project contract for the Coordinator General to impose new conditions should unexpected project impacts occur.

The project should be conditioned to provide a dedicated manned 24 hour telephone and email service to provide the community with a complaint and information reporting hotline.

Compulsory reporting and response measures should be put in place to record, track and action all complaints and provide public reporting on issue outcomes and compliance levels on the project website and for the Coordinator General (for public release). Independent verification of the community and complaints process should be

periodically undertaken to ensure compliance with project conditions. Strict financial penalties should be included in the project conditions for any breach of community consultation and complaints handling procedures.

Commencement of all key project components should be communicated with the community in advance of all works and clear details about the duration, scope and nature of the works, together with details on how to make a complaint must be included. This should be done via reliable direct household and business letterbox drops, email and posted letters as well as via media and multi-media channels.

A clear, mandatory identification system should be introduced for all construction and project management workers vehicles (including sub-contractors) via a numbering system that can be readily understood and identified by the community.

Strict financial penalties for the contractor should be included in the project conditions for any breach of operating hours by workers or truck movements, noise and vibration non-compliance or failure to communicate with residents in advance of new project works.

Equally the project terms should include incentives to meet or exceed all community, environmental, noise and other conditions to encourage the highest level of best practice.

Recommended changes:

- **24 hour complaints line;**
- **contractor penalties for non-compliance with agreed noise, dust vibration, truck routes and work hour conditions; and**
- **compulsory publication and reporting of breaches for public awareness.**

I look forward to your feedback on how the issues I have raised will be addressed as part of planning for the project.

Should you require any further information please do not hesitate to contact me on 07 3403 8605 or at tennyson.ward@bcc.qld.gov.au.

Yours sincerely



Nicole Johnston
Councilor for Tennyson