

Mick Cassel  
Secretary  
Department of Planning & Environment  
4 Parramatta Square  
Parramatta NSW 2150

Attention: Keith Ng (Senior Planning Officer, Transport Assessments)

Dear Mr Ng,

**Sydney Metro West: Rail Infrastructure, Stations, Precincts and Operations (SSI-22765520) - Environmental Impact Statement**

Thank you for providing Port Authority of New South Wales (**Port Authority**) with the opportunity to review and comment on the Environmental Impact Statement (**EIS**) for Sydney Metro West – Rail infrastructure, stations, precincts, and operations (SSI-22765520) (the **Application**). Port Authority is supportive of the Application, and we provide the following comments and requests for further involvement to help ensure the successful integration of land uses in Bays West.

**Bays West Place Strategy**

1. Port Authority notes that Sydney Metro West will continue to work with the Department of Planning and Environment (DPE) to integrate the Bays Station with the Bays West Place Strategy (Place Strategy) and the associated draft Bays West Urban Design Framework and relevant sub-precinct master plans. It is stated that this may include changes to the:
  - overall street network (such as the layout and function of the streets) within the precinct, and access to the precinct from Robert Street.
  - location of interchange facilities.
  - public domain and adjacent station development proposed throughout the precinct.
2. One of the Directions of the Place Strategy is to *retain, manage and allow the essential strategic port and maritime industry uses to grow and evolve, to ensure they continue to support the NSW economy*. The Place Strategy also acknowledges the opportunities for ambitious innovation in the planning of the integration of ports and working harbour with urban renewal and blue economy knowledge-intensive industries, and includes several actions directly related to this.
3. Section 13.1 of the EIS references the Bays Station having *direct access to the future Waterfront Promenade, which would run north-south along White Bay*. Port Authority supports the intention to provide a waterfront promenade within the White Bay Power Station (and Metro) and Robert Street Sub-precincts, subject to the current Bays West Stage 1 Draft Master Plan (Stage 1 Master Plan), currently

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on public exhibition. All other parts of White Bay and Glebe Island (Bays Ports) are not within the scope of the EIS or the Stage 1 Master Plan and will be subject to further work and investigations, including the location of any active transport links as noted in the actions of the Place Strategy, to be led by Port Authority of NSW in collaboration with DPE and other Government stakeholders.

### **Transport and Traffic**

4. Port Authority has been working collaboratively with Sydney Metro West, DPE and their specialist consultants on traffic and transport matters related to the EIS, the Place Strategy, the Stage 1 Master Plan and current and future transport requirements for port and working harbour activities in Bays West (including the White Bay Cruise Terminal). Port Authority looks forward to continuing this important collaborative work as Bays Port grows, evolves and integrates with the urban renewal of Bays West.
5. Regarding the Bays Station area and the Stage 1 Master Plan, all White Bay Cruise Terminal traffic (except servicing, providing and staff related traffic) is required to travel through this area via James Craig Road, Solomons Way and Port Access Road. Additionally, other port and working harbour related traffic may travel through this area or access Port Authority land at White Bay via Robert Street.
6. **Given these transport requirements Port Authority expects and requests to continue to be formally involved in further investigations into, and any proposed changes to, the overall street network; interchange facilities; access to the site via Robert Street; options to improve the performance and capacity of the Robert Street / Mullens Street intersection; the interface with port traffic at Glebe Island; and pedestrian crossing facilities.**
7. **Port Authority also requests that Mitigation Measures EIS-TT8 and EIS-TT9 specifically include consultation with Port Authority in addition to Inner West Council and DPE.**

### **Construction Noise and Vibration**

8. Given the predicted construction noise impacts on nearby sensitive receivers and Port Authority's long standing and on-going relationship with the local communities adjacent to Bays Port, **Port Authority requests that the Construction Noise and Vibration Management Plan (CNVMP) for the Bays Station site is prepared in consultation with Port Authority.**

### **Non-Aboriginal Heritage**

9. The EIS indicates that box culvert excavation for new drainage infrastructure to the north of the White Bay Power Station may result in partial removal of significant fabric of the 'White Bay Power Station (Inlet) Canal' (Port Authority of NSW Section 170 heritage item – SHI #4560062). Pilot work for the traction substation may also potentially impact the canal.
10. Condition of approval D26 for the previous Sydney Metro West planning application (SSI-10038) requires that the 'revised Archaeological Research Design and Excavation Methodology(s) must include provision for early physical investigation of areas of impact identified as likely to contain State significant archaeology or subterranean heritage items in the research design to inform excavation in these areas. This must include the White Bay Power Station (inlet) Canal'.
11. **Port Authority requests further consultation regarding this investigation to confirm the final depth, fabric and integrity of the canal prior to work for this proposal, which would clarify the likelihood of direct impacts to the canal.**

### **Contamination and Groundwater**

12. The groundwater model developed for the Bays Station construction site as part of a previous Sydney Metro West planning applications predicted groundwater level decline (drawdown) in parts of the construction footprint, and predicted a proportion of inflow to the station excavation box is likely to be

indirectly sourced from White Bay, as surface water would act as a recharge to underlying groundwater units (where hydraulic gradients allow).

13. Port Authority notes (per previous Sydney Metro planning applications) that groundwater inflows to excavations and groundwater level drawdown associated with construction and operational activities may cause impacts such as activation of acid sulfate soils, which can impact the integrity of underground structures (such as adjoining wharf structures at White Bay owned by Port Authority) and potentially lead to migration of contamination.

**14. Port Authority therefore requests:**

- a) **that the groundwater monitoring program (established under previous Sydney Metro West planning applications) be reviewed on an on-going basis to allow any groundwater drawdown impacts at the Bays Station construction site to be proactively identified;**
- b) **to be informed of any actual groundwater drawdown impacts due to construction and operation at the Bays Station site based upon the monitoring program results; and**
- c) **to be provided the opportunity to review the Groundwater Management sub-plan to the CEMP for the Bays Station site prior to its finalisation.**

Should you request any further detail on the matters raised in this letter, please do not hesitate to contact me at [rbennett@portauthoritynsw.com.au](mailto:rbennett@portauthoritynsw.com.au).

Yours sincerely,



**Ryan Bennett**  
Senior Manager, Planning and Sustainability

6 May 2022