



**SUBMISSION FROM INNER WEST COUNCIL TO THE
MODIFICATION 2 - CONSTRUCTION METHOD CHANGE TO TBM
SSI-8863-MOD-2**

15 AUGUST 2023

Council appreciates the opportunity to make a submission to the Western Harbour Tunnel (WHT) Stage 2 Modification Report.

In raising the issues below, it should be noted Council has a long-standing position of opposing inner-Sydney motorways, including WestConnex and WHT. Council believes motorways create problems (not benefits) for the Inner West and Sydney region in the long-term. In particular, induced traffic erodes Sydney's liveability, air quality, transport affordability and economic productivity. Council is also concerned about more immediate construction impact issues, and its experience with WestConnex shows that these impacts can be significant and widespread.

As Councillors are being briefed by TfNSW on the date of submission, Council requests the opportunity to integrate any comments raised by Councillors into a revised submission by Friday 19 August 2023. Any comments received will be forward as an addendum to this submission.

SUMMARY OF KEY ISSUES

Following is a summary of key issues raised in this submission:

- A majority of impacts associated with the change in construction method to TBM will be sustained in the Inner West Local Government Area which include a major increase in heavy vehicle movements transporting spoil from the WHT construction site
- Council will strongly discourage the use of Victoria Road and if possible, encourage any heavy vehicle movements to use tunnels rather than surface roads
- Council is concerned that the *Technical Working Paper: Traffic and Transport – Construction*, utilises Victoria Road as a key corridor for heavy vehicles exiting at Rozelle Interchange
- Council seeks assurance on heavy vehicle movements using approved heavy vehicle routes with the implementation of a GPS tracking system fitted to all spoil vehicles to monitor compliance with approved routes to and from construction sites
- Council is concerned about the noise, vibration and ground settlement impacts associated with the construction of a launch chamber
- The TBM launch chamber is still in detailed design phase and is subject to change and the extent to which properties are to be impacted is still to be determined
- Additional construction depth in the Stage 2 Modification, will in effect be lost by the height of the launch chamber, therefore there will be no benefits as a result of the new construction depth
- Concerns regarding increased parking demand in the area to the north of the Rozelle Railyards construction site



- The modification underestimates the cumulative health impacts, given the duration of works and proximity of residents to the launch chamber when compared to the original EIS

CONCERNS WITH INCREASED TRUCK VOLUMES

When compared to the original WHT EIS it is anticipated that the construction activity will add a total of 1,362 (from 165 to 1527) heavy vehicles to the area's existing traffic during peak construction, traveling to and from City West Link.

TfNSW advises that the peak duration with high heavy vehicle movements is expected to be for an approximate period of six months with the peak to occur approaching Q1 2026.

Given the high number of daily heavy vehicle movements will occur on state-controlled roads, Council will strongly discourage the use of Victoria Road and if possible, encourage any heavy vehicle movements to use tunnels rather than surface roads. TfNSW has ensured that during normal (majority of) operations, once vehicles leave the site, vehicles will use State and Regional roads to make their way to their destination outside of the IWC LGA.

This does not appear to have been addressed in any detail in the *Technical Working Paper: Traffic and Transport – Construction*, however TfNSW have noted in separate correspondence that it is unlikely spoil trucks will use Victoria Road, and that the use of Victoria Road as an option for deliveries of other construction materials such as concrete or other consumables may come via Victoria Road as it may be the most efficient route for them to travel.

TfNSW has not precluded the use of Victoria Road in an ad hoc way if there is a major accident on City West Link, or to be used for a short period of time until City West Link is reinstated. Council will continue to discourage the use of heavy vehicles on Victoria Road and would seek that TfNSW provides an alternative route in the event that a major accident is to occur on the City West link, preferably with heavy vehicles redirected through tunnels.

Council is still concerned that with no confirmation on site locations for the disposal of spoil, the choice of site could potentially divert spoil trucks away from the City West Link onto Victoria Road in the event that a site is located away from anticipated sites in South and Western Sydney to the Northwest.

Council remains concerned about the significant impacts of the increase in heavy vehicle movements and would encourage the use of tunnels away from surface roads given the construction of Rozelle Interchange will be completed and operational at the time WHT works are to commence.

TfNSW has advised there may be network constraints and other operational matters that may prevent the use of tunnels, however Council would still request this be investigated in the event that circumstances change, and heavy vehicles can continue to use tunnels to avoid the need to access any surface roads.

Council seeks assurance on heavy vehicle movements using approved heavy vehicle routes with the implementation of a GPS tracking system fitted to all spoil vehicles to monitor compliance with approved routes to and from construction sites.

CONCERNS WITH NOISE AND VIBRATION IMPACTS

Although the overall construction depth will be lower with the use of a TBM to tunnel under the harbour, Council is concerned about the noise, vibration and ground settlement impacts associated with the construction of a launch chamber, particularly as the impacts of the

construction of the launch chamber will be longer than the initial approved project with the use of road headers.

It is also noted that the additional construction depth in the Stage 2 Modification, will in effect be lost by the height of the launch chamber, therefore there will be no benefits as a result of the construction depth given the height/ceiling of the chamber in the Stage 2 Modification will be of a similar depth when compared to depth using road headers in the originally approved EIS.

Council acknowledges the benefits of the use of a TBM and addressing concerns raised in Council's submissions to the original reference design & EIS, however Council is still concerned about the extent and duration of noise impacts, in particular residents at Rose Street and Ferdinand Street.

These impacts are potentially significant, given the exceedances which are expected during rock bolting, and rock hammering when compared to the original proposal. As the launch chamber is still in detailed design phase and is subject to change, Council would seek more clarification on the precise location and depth related to properties most likely to be impacted as a result of its construction.

Council remains concerned that the design and location of the launch chamber is still subject to change and that the extent to which properties are to be impacted is still to be determined.

In addition, Council will also seek further clarification on exceedances of the Ground-Borne Noise (GBM) Noise Management Level (NML) in comparison the original EIS and potential for TfNSW to minimise noise and vibration where possible throughout construction, particularly night works and long-duration impacts.

With regard to noise, Council is also concerned with increased external noise generated by all light and heavy vehicles at the White Bay construction support site now referred to as the Glebe Island construction support site. Council is concerned about the external noise associated with heavy vehicles and the delivery of pre-cast tunnel segments. Council seeks the use of noise attenuation to minimise noise impacts on surrounding residents.

CONCERNS WITH IMPACTS TO PARKING

As the modification removes all surface works in the vicinity of Yurulbin Point, Council's prior concerns about worker parking demands in that area no longer apply. Council has however previously raised concerns regarding parking in the area to the north of the Rozelle Railyards construction site.

WestConnex had created worker parking demand issues in this area and Council is concerned that WHT could prolong and possibly worsen this issue.

TfNSW advises this issue will be addressed by provision of around 300 on-site parking spaces at Glebe Island, with workers being transported into the tunnels by bus. TfNSW has also explained that the workforce to deliver the southern tunnelling works for WHT Stage 2 is expected to be less than the WestConnex workforce.

Notwithstanding these reassurances from TfNSW, concerns about worker parking remain and we believe the Glebe Island parking should be increased. Council would like TfNSW and the contractor to implement failsafe mechanism for ensuring all workers use the Glebe Island parking facility.

IMPACTS ON HEALTH

Council has insisted that the significant construction and operational impacts the community has felt from WestConnex not be extended to other parts of the Council area by the WHT.

It is acknowledged that the WHT EIS has assessed the cumulative health and other impacts of major projects in the Rozelle area, however Council remains concerned that the WHT Stage 2 Modification Report has underestimated these cumulative health impacts, given the duration of works and proximity of residents to the launch chamber.

Council remains concerned given residents have suffered obvious ill-health from noise, and sleep deprivation caused by night works from WestConnex work to date and in Council's view the impacts stated in the WHT Stage 2 Modification Report is an under estimation of what will likely be experienced once construction of WHT is underway. A particular concern is night works associated with trenching for an upgraded power supply for WHT road headers and the TBM.

While the WHT Stage 2 Modification Report has assessed key impacts, and that there are some benefits associated with the modification, Council's view remains that the impacts associated with the construction of the WHT is an underestimation of what is likely to be experienced once construction with the use of a TBM is underway.

Council looks forward to working closely with the TfNSW in achieving the best possible outcomes for the local Community and travelling public.

Should you have any questions regarding any points raised in this correspondence please contact Council's Infrastructure Projects Engineer, Allan Borg, via either email allan.borg@innerwest.nsw.gov.au or by phone on 02-9335 2275.

Your sincerely,



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