

Naomi Moss
Senior Planner
Department of Planning and Environment
320 Pitt Street
SYDNEY NSW 2000

Dear Ms Moss,

ENVIRONMENTAL IMPACT STATEMENT – WESTCONNEX M4-M5 LINK (SSI 16_7485)

Thank you for providing the Port Authority of New South Wales (Port Authority) with the opportunity to review and comment the Environmental Impact Statement (EIS) for the WestConnex M4-M5 Link. The Port Authority also makes reference to our submissions made to the original request for Secretary's Environmental Assessment Requirements (SEARs) and amended SEARs for this project dated 19 February 2016 and 3 April 2017 respectively.

The Port Authority is satisfied with the level of consultation undertaken by the Roads and Maritime Service (Sydney Motorway Corporation) during the EIS public exhibition period.

Background and Context

Existing Uses at Glebe Island/White Bay

The Port Authority is a State owned corporation which owns and manages common user berths and port land at Glebe Island and White Bay, which are in direct vicinity of the proposed Rozelle interchange portion of SSI 16_7485. Port land owned by the Port Authority in the Glebe Island / White Bay area is shown in the attached figure.

The Glebe Island port facility consists of four operational shipping berths and is currently used for unloading / loading bulk vessels (cement, gypsum, sugar and salt) and well as other temporary / occasional port, maritime and working harbour uses. The White Bay port facility consists of five operational shipping berths and is currently used as a cruise ship terminal, unloading / loading bulk vessels (tallow, lubrizol), a marine refuelling facility and a myriad of ad hoc port and working harbour uses.

Access to the port facilities is provided via James Craig Road and by the James Craig Road/The Crescent intersection. Cruise ship and other port related traffic, including heavy traffic, use James Craig Road to access/exit the port facilities of Glebe Island and White Bay. It is noted that the alternative access point to White Bay and Glebe Island, via Victoria Road and Robert Street, Rozelle, is not allowed to be used for the vast majority of traffic generated at the Port. Robert Street only functions as an access and egress point for the marine fuelling and boat storage facility at White Bay 6, providing traffic (only) for the White Bay Cruise Terminal, and for the ad hoc port and working harbour uses at White Bay.

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Future Short to Medium Term uses of Glebe Island/White Bay

In 2017, following an Infrastructure NSW (INSW) strategic review of Glebe Island, the NSW Government endorsed a recommendation that port facilities at Glebe Island be retained and expanded to meet the strategic supply needs of the construction industry in the Inner Sydney, in particular the materials for concrete production being sand, cement and aggregates. Consistent with the cabinet decision, Glebe Island is currently subject to the following proposals:

- A proposed Multi-User facility at Glebe Island for the import by sea of sand and other bulk dry construction materials to supply the increasing demand of these materials to the inner city. This proposal is progressing under a Part 5 process under the *Environmental Planning and Assessment Act 1979* (EP&A Act). Subject to obtaining planning approval, the Multi-User facility is expected to commence operations in the first quarter of 2019.

Peak traffic from the Multi-User will be around 500 trucks per day (1000 movements per day). Traffic to/from the proposed Multi-User facility will be by James Craig Road.

- A proposal by Hanson to construct and operate a concrete batching plant at Glebe Island (SSD 17_8544), in effect relocating their existing facility at the head of Blackwattle Bay to facilitate the redevelopment of this area. An Environmental Impact Statement (EIS) is currently being prepared for the proposed concrete batching plant. Hanson's request for Secretary's Environmental Assessment Requirements (SEARs) (JBA, 8 June 2017) indicate that the concrete batching plant will be supported by new aggregate shipping terminal facilities at Glebe Island 1 with capacity to manage up to 1,000 m³ of concrete aggregates per annum delivered by ship, and with a capacity to produce up to 1 million tonnes of concrete per annum. Concrete from the batching plant will be dispatched via trucks. Subject to obtaining planning approval, it is expected the proposed batching plant will commence operations in the second half of 2018 or early 2019.

Traffic movements from the proposed concrete batching plant is not reported in the Hanson's request for SEARs (JBA, 8 June 2017). Traffic from the proposed concrete batching plant will also use James Craig Road.

In addition, Glebe Island and White Bay are located within the Bays Precinct area which is earmarked for staged urban renewal under the Bays Precinct Urban Transformation Plan (Urban Growth, October 2015). The Plan anticipates the potential temporary use of Glebe Island as construction logistics site for major infrastructure projects. A number of NSW Government agencies have approached the Port Authority with proposals to use parts of the Glebe Island/White Bay precinct as construction support sites for some of the large infrastructure projects, including locating truck marshalling yards at the port facilities. These proposals have the potential to be traffic intensive developments. Traffic from these projects will all use James Craig Road.

James Craig Road/The Crescent intersection

As indicated above, port traffic associated with existing and proposed developments at Glebe Island / White Bay will use James Craig Road by The Crescent / James Craig Road intersection.

The Environmental Assessment for the White Bay Cruise Terminal (JBA, 2010) predicted peak hour traffic at James Craig Road with the cruise terminal and some other developments near Glebe Island ranging from 225-375 movements per hour, and the intersection analysis for James Craig Road/The Crescent predicted a Level of Service (LoS) of D/C. LoS A indicates good operation while LoS F indicates unsatisfactorily operation. LoS D is the lowest desirable level of service.

Comments to the EIS

Given the current uses and proposed traffic intensive developments at the Port facility in the short to medium term, the Port Authority have concerns regarding the impacts of the proposal on the James Craig Road port access. Nothing in the EIS suggests that construction traffic will require access to port roads. A change in this position will require the consent of the Port Authority.

Our comments on the EIS are:

- Construction traffic impacts on James Craig Road's port access and on The Crescent / James Craig Road Intersection

The timing of the Westconnex's works (2018-2023), and specifically the Stage 2 works (2019-2023), which involve the construction of the Rozelle Interchange, coinciding with the operation of the proposed Multi-User Facility, the proposed Hanson concrete batching plant, and the anticipated use of Glebe Island/White Bay for construction logistics for major infrastructure projects (including truck marshalling yards for a number of infrastructure projects).

The EIS indicates that the Rozelle civil and tunnel site works, located in the vicinity of the port facilities, would generate over 500 heavy vehicles movements and about 350 light vehicles movements per day. Two heavy vehicle accesses to the Rozelle city and tunnel site are proposed at the City West Link to the west of the James Craig Road/The Crescent intersection. The traffic assessment indicates that construction traffic would potentially impact on operation of the road network surrounding the construction facilities. Potential impacts due to temporary lane closures and speed reductions, particularly during traffic staging, are anticipated.

The EIS's Technical working paper: Traffic and Transport (the traffic assessment) does not consider the additional James Craig Road port related traffic associated with the proposed Multi-User Facility and the Hanson's concrete batching plant in Glebe Island (as these proposals were not known at the time of preparing the Westconnex's EIS). It is unclear whether the traffic assessment has considered traffic generation from construction logistics sites for major infrastructure projects within Glebe Island/White Bay (also using James Craig Road) as the details of these proposals are not fully known.

Port Authority seeks to understand:

- how the increasing port traffic along James Craig Road and its intersection with The Crescent could be impacted during peak hours and peak construction periods;
- how additional congestion caused by construction traffic in the Rozelle area would impact on port traffic during peak hours; and
- the potential impact on port traffic that may arise from the minor civil works proposed at James Craig Road and James Craig Road / The Crescent Intersection.

The Port Authority seeks consultation with the proponent during the detailed design (construction and operation) of the Rozelle interchange works to ensure that port related traffic retains adequate access to and from Glebe Island and White Bay 24/7.

- Construction Traffic and Access Management Plan (CTMP).

The EIS indicates that prior to the commencement of construction, a CTMP would be prepared as part of the Construction Environmental Management Plan to "set out the approach that will be adopted to minimise delays and disruptions, and identify and respond to any changes required to ensure road safety...., ...would propose a car parking strategy for construction staff at the various worksites, developed in consultation with relevant... stakeholders and identify measures to management the movements of construction related traffic to minimise traffic and access disruptions in the public road network".

The Port Authority requests that the CTMP components associated with the Rozelle interchange surface works be prepared in consultation with the Port Authority to ensure that adequate access is maintained for port related traffic from Glebe Island and White Bay, which must use the James Craig Rd / The Crescent intersection.

- Project Working Group (Construction).

The EIS indicates that "consideration would be given to the creation of a project working group, or equivalent, with the aim of managing projects impacts and disruptions through the sharing of relevant project information (eg. timing, duration and location of construction activities)".

The Port Authority supports the idea of creating a Project Working Group to manage construction related impacts and sharing information. The Port Authority must be represented in the Project Working Group as a key stakeholder impacted by construction traffic.

- Works within land owned by the Port Authority.

Section 6.3 of the EIS describes "the project footprint" as the area required for construction and/or operation of the project. Figures 6-5 and 6-6 of the EIS shows the project footprint within land owned by the Port Authority (ie. Lot 10 DP1170710; Port Authority's land north and east of Victoria Road and adjacent to Sommerville Road). The EIS describes the works in this area as "utility treatments, traffic management changes and measures, installation of safety and environmental controls and establishment of temporary pedestrian and cyclist diversions (if required)". It also indicates that removal of trees within Port Authority's land will be required.

Works within Ports Authority's owned land will require land owner's consent. Consultation with Port Authority will be required to better understand the nature, extent and impacts of the works on Port Authority's infrastructure.

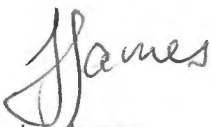
- Impacts on Utility Services

The EIS's Utilities Management Strategy indicates that as a result of the Rozelle interchange works "there would be significant impacts on existing utility services in that area which would need to be managed". Services potentially affected include Ausgrid 132 kV and 33 kV transmission feeders, Telstra multi-fibre optic cable and Sydney Water sewer and water mains. Proposed management measures are provided in Table 3-4 of the Utilities Management Strategy. Potential impacts reported include "temporary disruption to services such as power and water supply during the works".

The Port Authority requests that consultation with Port Authority be undertaken during detailed design of the utility services for the Rozelle Interchange area to minimise the risk of impacts on capacity to supply the port facility and the potential for disruption of services. As recommended in the EIS, the Port Authority supports the establishment of a Utility Co-ordination Committee including representatives of key agencies including the Port Authority.

Should you request any further detail on the matters raised in this letter, please do not hesitate to contact the undersigned.

Yours sincerely,



Joe James

EGM, Bays Development

16 October 2017