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Ms Belinda Scott
Senior Planner
Transport Assessments
Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

Email belinda.scott@planning.nsw.gov.au

Dear Belinda

**Beaches Link and Gore Hill Freeway Connection (SSI 8862)
Supplementary Advice on Environmental Impact Statement (EIS)**

I am writing to provide supplementary advice to the NSW Environment Protection Authority's (EPA) submission on the EIS for the above project. The EPA's submission letter dated 17 February 2021 (Ref: DOC21/99667) provided comment on noise and vibration, surface water quality, hydrogeology, contamination, waste and air quality.

The EPA requests additional information in relation to noise and vibration impacts, particularly regarding proposed out-of-hours work and the community engagement in relation to this work.

The EPA references the following documents:

- *Environment Impact Statement*, prepared by Jacobs, dated 4 December 2020 (EIS main report)
- *Appendix E: Community Consultation Framework*, prepared by Transport for NSW, dated December 2020
- *Appendix G: Beaches Link and Gore Hill Freeway Connection, Technical Working Paper: Noise and Vibration*, prepared by Renzo Tonin and Associates, dated December 2020 (TWPNV).

The EPA is concerned that the proponent is proposing to carry out some surface road work activities "up to 24 hour per day, seven days per week".

Table 5-3 of the TWPNV states that surface road works are proposed to be carried out "up to five consecutive days per week along the length of the works" for the Warringah Freeway surface road works and Gore Hill Freeway Connection surface road works. Section 5.1.6.1 of the TWPNV outlines the rationale for out of standard hours work as being the need to carry out construction work in a live traffic corridor with existing high traffic flows, with some works requiring a road occupancy licence (ROL), and to ensure personnel safety and operational integrity of the road network. The assessment states that ROLs for major road corridors are typically issued in blocks of consecutive nights to ease driver wayfinding and for safety reasons.

Section 5.1.6.1 also states that for the Warringah Freeway surface road works and the Gore Hill Freeway Connection surface road works, Transport for NSW (TfNSW) is planning to maintain a requirement to undertake these works over periods of up to five calendar [consecutive] nights to

minimise overall disruption to residents and the overall duration of the project's construction programme. The assessment states that *"this approach is based on the outcomes of extensive consultation with the affected receivers"*. However, the EPA has been unable to locate details of consultation that supports this statement in either relevant chapters of the EIS main document or technical appendices (e.g. Chapter 7 Stakeholder and community engagement, or Appendix E Community Consultation framework).

The proponent has projected that adopting the baseline approach in the *Construction Noise and Vibration Guideline* (CNVG) (RMS, 2016) of restricting night-time works to no more than two consecutive nights would extend the overall project construction program by nine months. It is proposed that moving the works along the road corridor will provide individual receivers with respite from construction noise while allowing project works over a continuous period (Section 5.1.6.1). However, the proponent has not detailed how such movement or staging will occur in practice, and how the proponent will manage the works to ensure that receivers on the fringes of a given group or catchment, for example, will not be exposed to extended periods of noise impact from different stages of the work.

The EPA requests, as part of the Response to Submissions, the proponent provide strong justification to depart from the baseline CNVG approach of restricting night-time works to no more than two consecutive nights per week at any work site. This justification must include demonstrated evidence of the need for out of hours works, the extent and type of consultation with affected communities on the proposed approach(es), as well as clear evidence of the degree of community agreement for their adoption. This should also include further information on whether any residual noise impacts are likely after applying all feasible and reasonable mitigation, including commentary on the total duration of night-time work at any one receiver, and any periods of respite between night-time work at any one receiver.

Should you require clarification of any of the above please contact Anna Timbrell, Senior Planning Officer on 9274 6345 or email anna.timbrell@epa.nsw.gov.au or Aleksandra Young, Unit Head on 9995 6083 or aleksandra.young@epa.nsw.gov.au

Yours sincerely



JACINTA HANEMANN
Acting Director
Regulatory Operations Metro South