



Bayside Council

Serving Our Community

19 December 2019

Our Ref: F18/679

Contact: Howard Taylor 9562 1663

Belinda Scott

Senior Planning Officer - Industry Assessments

NSW Department of Planning & Environment

GPO Box 39

SYDNEY NSW 2001

Dear Ms Scott,

Re: Bayside Council Submission on Sydney Gateway Road Project (SSI-9737)

Thank you for the opportunity to make a submission in response to exhibition of the State Significant Infrastructure Development for the Sydney Gateway road project.

On behalf of Bayside Council, I endorse the attached submission prepared by Council staff on the Environmental Impact Statement for the Sydney Gateway road project. Bayside Council acknowledges the economic importance of the Sydney Gateway road project and that the project aims to:

- Support the growth of Sydney Airport and Port Botany
- Make efficient connections to Sydney's strategic centres

The Sydney Gateway road project will, however, have an impact on the local area and relevant issues have been highlighted in the attached submission, in particular:

- Planning Priorities in the Eastern City District Plan and Bayside Local Strategic Planning Statement
- Transport, traffic and access
- Noise and Vibration – amenity
- Place Making and Urban Design
- Visual Amenity
- Socio-economic, Land Use and Property
- Heritage
- Biodiversity
- Flooding
- Water – Hydrology and Quality
- Contamination
- Air Quality
- Sustainability
- Climate Change Risk

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Please note that Table 3: Feedback on Key Issues, provides a detailed response to the Environmental Impact Statement.

If you have any questions in relation to this, please contact Clare Harley, Manager Strategic Planning, on 0404 163 594.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Meredith Wallace', written in a cursive style.

Meredith Wallace
General Manager

Attached:

1. Council submission

**BAYSIDE COUNCIL SUBMISSION
STATE SIGNIFICANT INFRASTRUCTURE
SYDNEY GATEWAY ROAD PROJECT (SSI-9737)**

Introduction

On the 20th November 2019, the Department of Planning, Industry and Environment (DPI&E) notified Council of the exhibition of a State Significant Infrastructure Development Application for the Sydney Gateway road project.

Sydney Gateway, which includes the Sydney Gateway road project, Botany Rail Duplication and Preliminary Draft Major Development Plan (PDMDP) is part of a NSW Government and Australian Government (Infrastructure Australia) high priority project initiative to improve road and freight rail transport through the important economic gateways of Sydney Airport and Port Botany.

Under the NSW Government Future Transport 2056 strategy, the Sydney Gateway road project will develop a link between WestConnex at St Peters Interchange and the Sydney Airport and Port Botany precinct, improving freight connectivity between Port Botany and the strategic motorway network and will support efficient traffic movement from WestConnex into key transport and trade land uses.

This submission provides feedback in relation to the projects consistency with the following strategic planning documents:

- Future Transport 2056
- A Metropolis of Three Cities – the Greater Sydney Region Plan
- Eastern City District Plan
- Sydney Green Grid – Central District
- Bayside Community Strategic Plan 2030
- Bayside Local Strategic Planning Statement
- Discussion Paper – Transport Strategy (Bayside Council)

And the following key issues identified in the Environmental Impact Statement (EIS):

- Transport and traffic
- Noise and Vibration – amenity
- Place Making and Urban Design
- Visual Amenity
- Socio-economic, Land Use and Property
- Heritage
- Biodiversity
- Flooding
- Water – Hydrology and Quality
- Contamination
- Air Quality
- Sustainability
- Climate Change Risk

The proposed development is for the purposes of ‘road’ and ‘road infrastructure facilities’. These types of development are permissible without consent under clause 94 of *State*

Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP), provided they are being undertaken by a public authority.

Clause 1 of Schedule 3 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP) specifies infrastructure or other development that would be an activity for which the proponent is also the determining authority would, in the opinion of the proponent, require an Environmental Impact Statement (EIS) to be prepared under Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

Roads and Maritime Services (RMS) formed the opinion that the project is likely to significantly affect the environment and therefore required the preparation of an EIS. The project has therefore been declared State Significant Infrastructure under Part 5, Division 5.2 of the EP&A Act. Council further understands that the NSW Minister for Planning and Public Spaces is the consent authority under Section 5.14 of the EP&A Act. On the 20th November 2019, the DPI&E notified Council of the exhibition of the State Significant Infrastructure Development Application for the construction of the Sydney Gateway road project.

Full documentation of the project can be found at:

<https://www.planningportal.nsw.gov.au/major-projects/project/10156>

The Sydney Gateway road project is proposed to include

- Connection to St Peters Interchange and beyond - A four-lane raised road in each direction with bridges to cross Canal Road and the freight rail line.
- Connection from St Peters to the International terminal - A four-lane road in each direction with two bridges over Alexandra Canal.
- New Link Road - This new airport freight access route will provide connections to Link Road following closure of Airport Drive.
- Widening of Qantas Drive - Widened from two-lanes to three-lanes in each direction to reduce congestion.
- New elevated road or 'flyover' to the Domestic terminals - The 'flyover' will separate vehicles travelling to the Domestic terminals from traffic heading towards Port Botany and Southern Cross Drive. This will enable travel from St Peters Interchange to the Domestic terminals without stopping at a single traffic light; and
- Alternative shared cycle and pedestrian pathway - New alternative cycle and pedestrian pathway to connect from Alexandra Canal to Mascot at Coward Street.

Council understands that parts of the Sydney Gateway road project are located on Commonwealth land leased by Sydney Airport Corporation Limited (SACL); and that these parts are defined as 'major airport development' under the *Airports Act 1996* (the Act).

The Act requires a Major Development Plan to be approved by the Australian Minister for Infrastructure, Transport and Regional Development.

Preliminary draft Major Development Plan

In accordance with Section 91 of the Act, SACL have prepared a PDMDP.

The PDMDP is on exhibition from 20th November 2019 to 21st February 2020 for a period of 60 days. Council's response to the PDMDP will be a subject to a separate Council report.

Background

Draft Secretary's Environmental Assessment Requirements (draft SEARs)

On 4th December 2018, Council officers responded to a request from the Department of Planning and Environment (now the Department of Planning, Industry and Environment) to review the draft Secretary's Environmental Assessment Requirements (draft SEARs) and requested that the following be included in the final SEARs:

- **Consultation**

The SEARs should make specific reference to the special interest groups that need to be consulted, including Local Aboriginal Land Councils, pedestrian and bicycle user groups and the Cooks River Alliance.

The proponent needs to assess the potential for construction fatigue to occur during the construction of the project and describe how mitigation measures, complaint handling procedures and community consultation mechanisms will mitigate construction fatigue. The assessment must consider the cumulative impacts from the project and other major projects in the local area.

- **Transport and Traffic**

In addition to an assessment of the construction transport and traffic impacts of the project outlined in the SEARs, the Proponent should consider the impact of construction on access to on-street parking from property and business owners, the cumulative impacts of other infrastructure projects and the need for project staging to mitigate transport impacts.

The Proponent must also assess and model the operational transport impacts of the project in consultation with affected Councils and consider wider transport interactions including connections to Sydney's south.

- **Noise and Vibration – Structural**

The Proponent must carry out a cumulative assessment of potential construction noise and vibration impacts resulting from other developments including the Botany Rail Duplication.

- **Visual Amenity**

In addition to an assessment of the visual impacts of the project outlined in the SEARs, the Proponent should consider the impact of the project on landscaping, green space and existing tree canopy.

- **Climate Change Risk**

The Proponent must consider ways to mitigate heat island effects including increasing tree canopy or non-bird attracting landscaping into the project.

- **Socio-economic, Land Use and Property**

Within the social impact assessment component of the SEARs, the Proponent should consider community severance and barrier impacts when assessing the impact of the project on people's way of life.

The Proponent needs to provide an assessment of the impact on community facilities, including open space and recreation facilities. The assessment must include the use of existing facilities impacted by the proposal and options and opportunities for the relocation and or reconfiguration of the facilities both temporarily and permanently.

Sydney Gateway Concept Design Project Overview

On the 20th June 2019, Council staff provided comments to RMS on the Sydney Gateway Concept Design Project Overview documentation. Key issues raised in Council's comments included:

- Port Botany Freight Access
- Sydney Gateway to facilitate significant improvements to Sydney Airport Public Transport Services
- Active Transport and Community Connectivity
- Excellence in architectural design to minimise visual impacts of the flyover structures
- Construction fatigue; and
- Environmental Impacts
 - Noise and Vibration - Structural
 - Visual amenity
 - Socio-economic, Land Use and Property

Public exhibition

Council staff have undertaken a review of the exhibited documents and provide the following feedback for the DPI&E's consideration:

Strategic planning

Future Transport 2056

Future Transport 2056 (FT56) finalised in early 2018, aims to ensure that the Greater Sydney area will develop and maintain a world class, safe, efficient and reliable transport system over the next 40 years, while anticipating rapid changes in technology and innovation. FT56 outlines a comprehensive strategy detailing how people and goods will be transported around the state, including high-level strategic details for proposed future infrastructure and initiatives.

In relation to integrating land use and transport planning, FT56 notes the following:

'The best places take time and strong partnerships to develop and flourish. Integrated land use and transport planning can activate public spaces, corridors and networks, and positively impact the delivery of health, education and local government services. Transport

can improve the liveability and character of places across the state, achieve wider benefits from investment and encourage more desirable patterns of development.'

Whilst Sydney Gateway road project is considered generally consistent with the aims and objectives of FT56, the Environmental Assessment does not adequately explore opportunities for activation of active transport networks and green grid project opportunities.

Refer also to further comments under the headings 'A Metropolis of Three Cities'; 'Eastern City District Plan'; 'Sydney Green Grid – Central District' and in Table 3.

A Metropolis of Three Cities – the Greater Sydney Region Plan

The Sydney Gateway road project is considered generally consistent with the overall intent of the Greater Sydney Region Plan and the Environmental Assessment notes consistency with a number of objectives, in particular, objectives 3, 15 and 16.

However, Objective 4 requires infrastructure use to be optimised, which can be achieved by exploring opportunities to:

- *use land more efficiently by co-locating services, or by allocating road space to support increased mass transit services*
- *change user behaviours by flexible pricing and other policies*
- *develop and implement travel plans to encourage the use of sustainable transport choices.*

As noted in Table 3 under the heading 'Traffic and Transport', Council requests that the proponent give consideration to updating existing contracts in relation to pricing and 'no compete' clauses to encourage sustainable transport (bus/ rail patronage); and inclusion of active transport linkages as part of this project.

Objective 4 also notes:

'A major challenge for providers of infrastructure is to realise the innovative opportunities in place-based interdependencies, and so increase value for money, sustainability and resilience. It is necessary to recognise that real-world infrastructure systems are highly interconnected, both with each other and with the socio-economic and natural systems in which they are located.'

As noted throughout this submission, the Environmental Assessment is required to give further consideration to the relationship between the Sydney Gateway road project and the socio-economic (e.g. Mascot) and natural systems (e.g. green grid project opportunities identified in the Eastern City District Plan and Government Architects Office publication 'Sydney Green Grid – Central District') to identify wider benefits to be included as part of this project.

Eastern City District Plan

It is noted that the Environmental Assessment has generally addressed the Eastern City District Plan (ECDP), but has not specifically addressed the following Planning Priorities and/or actions:

- *Planning Priority E9 – Growing international trade gateways*

Sydney Gateway road project is considered to be generally consistent with this planning priority. However, Action 31m requires provision of safe cycling and walking connections, particularly to Mascot Station, and that Council and State agencies are responsible.

Council requests that the Sydney Gateway project team liaise with Council and stakeholders to plan for high-quality, separated walking paths and cycleways that connect to surrounding communities as part of this project.

- *Planning Priority E11 – Growing investment, business opportunities and jobs in strategic centres*

The following actions are of particular relevance to the project, in particular, the relationship between the project and strategic centre of Mascot:

38e. balancing the efficient movement of people and goods with supporting the liveability of places on the road network

38f. improving the walkability within and to centres

38g. completing and improving safe and connected cycling network to and within centres

Council requests that the Sydney Gateway project team liaise with Council to identify opportunities for high-quality, separated walking paths and cycleways that connect to multiple local centres and surrounding communities as part of this project.

Refer to further comments under the heading 'Traffic and Transport' in Table 3 of this submission.

- *Planning Priority E14 – Protecting and improving the health and enjoyment of Sydney Harbour and the District's waterways*

The planning priority states that new infrastructure provides opportunities to improve community access to the District's waterways, notably the Alexandra Canal. However, the Environmental Assessment and associated documentation have not detailed any improvements to surrounding and impacted waterways. The proponent should work with agencies to identify ways in which the project can contribute to the health and accessibility of waterways.

- *Planning Priority E 15 – Protecting and enhancing bushland and biodiversity*

The proposal involves the removal of habitat for a number of terrestrial fauna. These direct impacts on fauna are a setback for Council's future obligations for these areas. The EIS and associated documentation should be amended to address this Planning Priority and outline alternative measures that will be in place for additional foraging habitat for the Grey-headed flying fox, eastern Bent Wing-Bat, as well as mangroves.

- *Planning Priority E17 - Increasing urban tree canopy and delivering Green Grid connections*

"Mill Stream and Botany Wetlands Open Space Corridor Extends from Botany Bay and Sydney Airport through The Australian, Lakes, Eastlakes and Bonnie Doon golf courses to Centennial Park. The corridor is home to two regionally rare vegetation communities, the Sydney freshwater wetlands and the Eastern Suburbs banksia scrub. Public use and access along this corridor is limited, and this project presents a significant opportunity for improved north-south access and cross-district access."

Council requests that where possible, a 5m at-grade verge is provided adjacent to the footings and supports of bridges, ramps, and overpasses to enable future open space, green-grid connections and passageways. Council requests that RMS consults with Council staff to facilitate the delivery of the Green Grid identified in the Eastern City District Plan.

Council is in the process of establishing protection mechanisms around the Green Grid enhancing biodiversity and ensuring ecological resilience. The EIS and associated documents should be amended to address this Planning Priority and outline how the project intends to protect and enhance the Green Grid.

Sydney Green Grid [Central District]

In acknowledging that green space is a key hallmark of liveability in urban areas, the Government Architects Office NSW in their publication 'Sydney Green Grid – Central District' (publication) has identified a network of high-quality green space that connects town centres, public transport hubs, and major residential areas. Known as the Sydney Green Grid, it is an integral part of the Greater Sydney Region and District Plans.

The Sydney Gateway road project is in close proximity to the 'Mill Stream and Botany Wetlands Open Space Corridor', 'Alexandra Canal' and 'Freight Lines Chullora to Botany' green grid project opportunities identified in the publication.

Any opportunities to contribute to Sydney's green infrastructure and access to quality green spaces should be conditioned as part of any project approval

Bayside Community Strategic Plan 2030

In early 2016 the Greater Sydney Commission (GSC) was established to co-ordinate and align planning for Greater Sydney. The GSC prepared the Eastern City District Plan (ECDP) which applies to the Bayside Local Government Area (Bayside LGA). Bayside Council then prepared the Bayside Community Strategic Plan 2030.

The relevant strategic directions contained in the Bayside Community Strategic Plan 2030 (Plan) are highlighted in **Table 1**, below:

Table 1: Bayside Community Strategic Plan 2030

Theme Four – In 2030 we will be a prosperous community	
Strategic Direction	How we will get there
The transport system works	<ul style="list-style-type: none"><i>We can easily travel around the LGA – traffic problems/ gridlock are a thing of the past</i><i>We can easily travel to work by accessible, Council reliable public transport</i>

As such, the Plan recognises the strategic importance of the Sydney Gateway road project in supporting the international trade gateways of Sydney Airport and Port Botany and will assist in improving access to the gateways. However, it will be important for the proponent to consider the impacts of the project on local communities and to work with Council to achieve the strategic directions set out in the Plan.

Further detailed comments in relation to transport are provided under the heading 'Traffic and Transport' at Table 3, below.

Draft Bayside Local Strategic Planning Statement (Draft Bayside LSPS)

Recent amendments to the EP&A Act introduced the requirement for a LSPS to be prepared by Councils. The draft Bayside LSPS sets the 20-year vision for the Bayside LGA, including identifying the special character and values to be preserved and how change will be managed. The draft Bayside LSPS explains how Bayside Council is implementing the planning priorities and actions in the relevant district plan in conjunction with the Bayside Community Strategic Plan 2030.

The Sydney Gateway road project is aligned with the following relevant Planning Priorities identified in the draft Bayside LSPS, as noted in **Table 2**, below:

Table 2: Draft Bayside Local Strategic Planning Statement - Planning Priorities

Bayside Planning Priority	Actions	Consistency with Sydney Gateway road project
<i>1 Align land use planning and transport infrastructure planning to support the growth of Bayside.</i>	<i>1.6 Council will prepare submissions to the NSW Government in relation to State Significant development applications (and similar) for projects including Sydney Gateway, Port Botany Rail Duplication, Metro Rail and others as they arise.</i>	<p>The Bayside LSPS notes that as the trade gateways are expected to grow, there will be more freight and traffic on roads that are already congested, as noted in the Community Strategic Plan 2030.</p> <p>Transport is therefore a key priority for Council, and Council is committed to working with RMS and SACL to ensure the Bayside community benefits from this and other major transport projects.</p> <p>In accordance with the actions under this priority, Council has prepared this submission for the DPI&E to consider in its assessment.</p>
<i>14 Protect and grow the international trade gateways</i>	<i>14.5 Protect Port Botany's function as an international gateway for freight and logistics and supporting port-related land uses and infrastructure in the area around the port.</i>	Sydney Gateway road project supports the Bayside LSPS planning priority by supporting the growth of the Sydney Airport and Port Botany international trade gateways.
<i>15 Deliver an integrated land use and transport planning 30-minute city</i>	<i>15.2 Investigate, plan and protect future transport and infrastructure corridors (also refer to Bayside Planning Priority 1).</i>	<p>Sydney Gateway road project will contribute to delivering the 30-minute city.</p> <p>However, Council raises concerns in relation to the lack of access to the Cooks River Intermodal Terminal and the continued impacts on Mascot Town centre. Refer also to comments at Table 3 of this submission.</p>

Discussion Paper – Bayside Transport Strategy (May 2019)

The Transport Discussion Paper (discussion paper) provides a high level summary of the strategic transport context, current transport conditions and forecast growth in the Bayside LGA and was commissioned to inform the preparation of the Bayside LSPS.

The discussion paper acknowledges the contribution Sydney Gateway road project makes to traffic movements. However, the discussion paper notes that cycling infrastructure is generally limited to on-road cycling routes and some shared path routes, and that the key

cycling connection at Alexandra Canal may potentially be lost with the delivery of the Sydney Gateway road project.

It is important that the proponent work with Council staff to identify opportunities for cycling infrastructure (active transport) in the locality as part of this project.

Refer also to further comments under the heading 'Traffic and Transport' at Table 3 of this submission.

Other Plans

Navigating the Future – NSW Ports 30 Year Master Plan (NSW Ports, 2015)

The NSW Ports 30 Year Master Plan (NSW Ports Master Plan) aims to efficiently and sustainably accommodate the forecast growth in container freight, bulk liquid and gas, and dry bulk. The NSW Ports Master Plan estimated that container volumes through Port Botany will increase from 2.3 million twenty-foot equivalent units (TEU) to 8.4 million TEU by 2045.

The NSW Master Plan sets five objectives to address the forecast growth at both Port Botany and Port Kembla, each with direct relevance for the Bayside LGA. The following objective has particular relevance to the Cooks River Intermodal Terminal:

- *Efficient road connections to the ports and intermodal terminals – because road will continue to move the most freight.*

Access from the Sydney Gateway road project to the existing Cooks River Intermodal Terminal has not been provided. This is inconsistent with the objectives of the NSW Ports Master Plan. As noted in the comments in Table 3 of this submission, Council raises concern that container traffic will continue to travel through the Mascot Town centre, a high density mixed use precinct, to access this terminal.

Environmental Impact Statement

A review of the Environmental Impact Statement in light of the key issues previously identified by Council (SEARs Key Issues) has been undertaken by Council staff and feedback and recommendations are provided at **Table 3**, below.

Table 3 – Feedback on Key issues

Key issue	Feedback
Transport and Traffic	<p>Traffic</p> <p>Reference is made to Chapter 9 of the EIS and Technical Working Paper 1 – Transport, Traffic and Access. Council requests that the EIS be amended to consider the following issues:</p> <ol style="list-style-type: none">1. Pg 9.4 – Construction stage modelling – Baseline scenario – 2022. Council requests that the baseline scenario for construction takes into account current network performance (2019) to gauge the impacts of construction activity of the project. The other projects that are likely to be operational will not realise any benefit during the construction periods. Hence the current year baseline is a more reliable indicator for comparison with the 2022 construction stage modelling.2. Pg 9.8 Figure 9.4 – The following intersections are to be included in the EIS for operation as well as construction impacts as they have significant relevance for the Bayside community:<ol style="list-style-type: none">a. Ross Smith Drive/ Sir Reginald Ansett Drive – this route is significantly congested and causes delays at both ends of Ross Smith Driveb. Wentworth Avenue underpass/ General Holmes Drive – significant network connection recently completed is not considered in the model

	<p>c. Botany Road intersections with Robey Street and King Street – important links to the airport from eastern and south Sydney suburbs</p> <p>d. The Church Avenue two-way proposal impacts on local residents. The potential congestion and delay on O’Riordan Street during and post construction has not been assessed.</p> <p>3. Pg 9.9 and 9.10 Figure 9.5 – Forest Road, Wickham Street, Marsh Street, M5 have not been considered in the model which currently carries high traffic volumes to and from the Airport and Port Botany. The EIS also does not consider anecdotal evidence of airport customers using surface roads to reach the airport due to unreliable journey times along M5 east. King Georges Road, Stoney Creek Road, Forest Road is the alternate route to the airport instead of the M5 east tunnel. Further, routes 1, 2 and 5 must be included in the construction related travel time changes as these will be the most likely routes for construction vehicles to and from the precinct.</p> <p>4. Sec 9.2.5 – pedestrian linkages to and from the airport are very poor leading to pedestrians currently walking along major road corridors unprotected. The proposal must address and provide better linkages to encourage active transport.</p> <p>5. Sec 9.3.1 Pg 9.26 - Airport related traffic tends to peak on Fridays and weekends and it is proposed to undertake a lot of construction during that time. This will impact local community access due to delays and congestion that the construction traffic and closures may impose.</p> <p>6. Pg 9.26 traffic volumes – Holbeach Avenue for compound C3 – workers parking and access – details are required for the intersection performance and right turn at Princes Highway, including potential increase in delays to traffic through Wolli Creek and Arncliffe and impacts on the local network</p> <p>7. Sec 9.3.2 – The increase in travel time delays to General Holmes Drive and O’Riordan Street during and post construction is not a good outcome for local residential amenity as it will lead to a land-locked situation for local traffic with significant delays to enter or leave the local precinct in Mascot. Delays along General Holmes Drive will also lead to localised traffic queue jumping using local streets in Brighton Le Sands and Kyeemagh.</p> <p>8. Sec 9.3.7 – Parking – The EIS is to include an assessment of the number of workers expected to be working on the project at any point in time to assess the impacts of parking and traffic related to construction workers. Given that a lot of the proposed works will be undertaken out of hours and at night time, parking restrictions do not apply in the majority of the residential streets in the vicinity. Night time workers are highly unlikely to use public transport and there is none in the vicinity of the proposed work sites. Workers will be competing with residents for street parking at night time. This has been an ongoing issue with the construction of WestConnex especially at the Marsh Street compound. Impacts of travel and parking associated with construction workers must be addressed in consultation with Bayside Council. (Sec 9.6.2 TT13 pg 9.58). Due to the proposed works an estimated 260 car spaces and 500 sqm of area within terminal 1 for freight will be lost within Sydney Airport land. Details are to be provided to determine how this will be managed by Sydney Airport Corporation.</p> <p>9. Sec 9.4.2 Fig 9.19 Public transport routes 2 and 3 primarily service Bayside residents. Delays to these routes in the PM westbound direction will be detrimental to the Bayside community and are to be minimised.</p> <p>10. Sec 9.6.2: Concern is raised that there is a lot of simultaneous construction activity going on in this precinct by various state agencies as well development construction activities. There must be a nominated contact officer within state agency to facilitate and coordinate all such activities to ensure that it does not hinder local construction work nor disadvantage residents in the precinct. There must be a coordinated approach to minimise local impacts.</p> <p>11. Sec 9.4.4 – Concern is raised that numerous road sections operate at Level of Service E and F post construction, in particular, the intersections to airport terminals. This outcome is inconsistent with the</p>
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Planning Priorities stated in the Bayside Local Strategic Planning Statement. Due to non-reliability of travel time there is significant anecdotal evidence of airport customers travelling through other state road networks within Bayside (King Georges Road to Stoney Creek Road to Forest Road to Wickham Street to Marsh Street to airport). Low LOS will lead to traffic continuing to use other roads within the precinct to avoid paying tolls for marginal improvements to travel time.

12. Sec 9.4.8 – Concern is raised about the increase in travel time for buses due to the removal of the right turn from Qantas Drive into Sir Reginald Ansett Drive. Any increase in travel times for airport worker due to changes to access, especially for Bayside residents who work at the airport, are to be minimised. The impacts of changes to access to northern lands is not clear in the EIS and is to be clarified.
13. Sec 9.5 Cumulative construction impacts of Botany Rail Duplication and Gateway road project creates delays of 8 to 20 minutes to access airport terminals during peak use on weekends. The delays are currently significant. The projection only shows the impact from the 2022 to 2026 construction period and hence will result in significantly poorer outcomes than presented in EIS especially for Rockdale and Mascot communities which Council considers unacceptable.
14. The proposal does not consider the provision of additional public transport options along the new corridor to discourage private vehicle trips (it is recognised that public transport is not part of this proposal but it should be considered for benefits of our local community). The EIS is to be amended to give greater consideration of public transport and active transport options as discussed elsewhere in this submission.
15. The proposal does not provide adequate subsurface and direct connections for Port Botany traffic to access this corridor. It heavily relies on surface road network around the airport for connections to north and west which is a large contributor to the intersections operating at LOS of E or F in peak hours. Council considers this outcome unacceptable.
16. The proponent is to consult with Council's Development Services staff to determine the cumulative traffic impacts of a number of existing and proposed concrete batching plants on the project and the EIS amended accordingly.
17. A construction traffic and access management plan must be prepared in consultation with Bayside Council.

Cruise ship terminal

It is noted the *Port Authority of New South Wales: Project Update 1 October 2019 Cruise Capacity Newsletter* in the following link:

https://www.portauthoritynsw.com.au/media/3792/project_update_1_october2019.pdf) states in relation to local traffic impacts:

"Traffic flows associated with a cruise terminal will be modelledThe assessment will consider movements generated by passenger arrivals and departures, potential public transport solutions and the use of vehicles to service and supply provisions to vessels. Other nearby projects such as Sydney Gateway and Port Botany Freight Line Duplication are underway to relieve congestion on the road networks and information from these projects is also being incorporated into planning for a potential terminal"

This implies that the consideration of a proposed cruise ship terminal at either Molineaux Point, Port Botany or Yarra Bay, Phillip Bay is taking into consideration the outcomes of Sydney Gateway and Botany Rail Duplication in addressing local traffic congestion.

The Port Authority, however, has released very few details to the public of what the impacts of the cruise ship terminal will be, particularly in relation to traffic and transport impacts.

Therefore, Council is unable to adequately assess traffic benefits of Sydney Gateway without understanding how much of the suggested increased in

capacity of the roads being delivered by Sydney Gateway road project will be taken up by traffic requirements of the proposed Cruise Ship terminal.

Transport:

Port Botany and Cooks River Intermodal Freight Access

The NSW Ports' 30 Year Master Plan includes the following objective to drive a sustainable future for the port supply chains:

'Provide efficient road and rail connections to the ports and intermodal terminals'

The Sydney Gateway EIS does not appear to include the provision of a Cooks River Intermodal freight access ramp. The absence of this access is critical to the future 'Place' planning for the town centres of Mascot, Wolli Creek and the emerging 'growth centre' of Arncliffe.

Following completion of the Sydney Gateway, the Canal Road 'Cooks River' intermodal terminal is forecast to receive 30% of the Port 'TEU' containers and, as such is a major local freight destination critical to the efficiency of the Port and its ancillary businesses. Despite its central location and key freight role, no motorway access is provided to this intermodal facility via Canal Road or elsewhere. The absence of such a motorway access ramp implies that freight, heavy vehicles and dangerous goods will continue via Mascot Town Centre on the 'O'Riordan, Bourke, Coward, Kent, Ricketty' route. This route currently sees severe road use conflict with these heavy vehicles travelling through the high density Mascot Town centre precinct.

For Council and Transport for NSW (TfNSW) to continue to plan for Mascot's growth as a residential and business Strategic Centre as identified by the Eastern City District Plan, its value as a 'Place' relies on the absence of heavy vehicles and freight in the Mascot precinct. As such, the freight passage from Port Botany to the Cook's River Intermodal Terminal must be via Sydney Gateway and not via local roads as is stated in the EIS.

Council requests that:

18. A Cooks River Intermodal link is provided with a dedicated Canal Road (or equivalent) motorway on/ off-ramp. If this motorway access cannot be incorporated into the Sydney Gateway design, Bayside Council request the NSW Government investigate, with NSW Ports and other stakeholders, the re-location of the Cooks River inter-modal terminal to an alternate, more appropriate location.
19. The Sydney Gateway road project delivers improved heavy vehicle access and intersection upgrades in the Port Botany freight route from Foreshore Road through to Sydney Gateway road.

Active Transport and Community Connectivity

The key objectives listed by RMS for the Sydney Gateway road project are to deliver 'Easy, Fast and Safe access for customers' (the community) to Sydney Airport. Council requests that the easy, fast and safe access applies across all modes of transport and includes a number of high quality active transit links as detailed in TfNSW's draft Principle Bike Network (PBN) to complete key local and regional active transport connections for residents, visitors and workers alike.

This outcome is consistent with NSW and local government strategies to realise the increased individual and public benefit of increasing the mode-share of active travel (walking and cycling). This is especially critical as Sydney Airport is a major employment hub and destination within 10 kilometres of Sydney's CBD. The Eastern City District Plan - Action 31.m. reiterates the requirements for access to Sydney Airport, seeking further development of the provision for safe cycling and walking connections, particularly to Mascot Station.

	<p>Council requests the Sydney Gateway project team to continue to liaise with local Councils and stakeholders to enable provision for enhanced community access throughout the project area by way of high-quality, separated walkways and cycleways that connect to multiple local centres and surrounding communities including:</p> <p>Enhanced pedestrian access into the Domestic Terminal:</p> <p>20. A grade-separated pedestrian bridge over Qantas Drive from O’Riordan Street that provides local access between Mascot Station town centre and the Domestic Terminal (and future ground transport interchange).</p> <p>Green Grid connections:</p> <p>21. A north-south ‘Northern Lands’ (Alexandra Canal to Sydney Park) open space link</p> <p>22. An extended east-west (Mill Pond to Sydenham Metro Station) open space and community link (this is specific to community access sought in submission to the Botany Rail Duplication)</p> <p>Active Transport connections:</p> <p>23. A direct Alexandra Canal to Domestic (T2) link from the West</p> <p>24. A direct Wentworth Avenue to Domestic (T2) link from the East (remediating the absence of pedestrian and bicycle provision in the Airport East Access project)</p> <p>25. An improved Cooks River crossing (Cahill Park to Tempe Reserve)</p> <p>26. An Alexandra Canal to Mascot link (Coward/ Ricketty Street)</p> <p>27. In addition, it is requested that where possible, a 5m at-grade verge is provided for adjacent to the footings and supports of bridges, ramps, and overpasses to enable future open space, green-grid connections and passageways. In particular, Council requests RMS to consult with Council staff to facilitate the implementation of the Green Grid priority project opportunities noted under the heading ‘Strategic planning’ in this submission as part of this project.</p> <p>Sydney Gateway to facilitate significant improvements to Sydney Airport Public Transport Services</p> <p>Sydney Airport is an international trade and tourism gateway and the region’s largest employer. Future Transport 2056 and the Eastern City District Plan require Sydney Airport to be serviced by equitable public transport.</p> <p>Council notes that the Sydney Gateway project team is working with TfNSW and Sydney Airport to explore options to improve public transport within the airport precinct.</p> <p>Council reiterates concerns in relation to the ‘no-compete’ (bus service) and ‘station access fee’ (train service) agreements raised in submissions about the Sydney Airport Masterplan. The agreements are considered to negatively impact the desirability of public transport usage at Sydney Airport.</p> <p>28. Council requests that the ‘station access fee’ and ‘no compete clause’ bound to the Airport Link line contract be removed as a package of measures to increase public transport use to Sydney Airport.</p> <p>In addition, specific infrastructure (transit lanes etc) should be considered for inclusion in the final design, in particular:</p> <p>29. Council requests that the Sydney Gateway project includes a bus rapid transit (BRT) and expanded bus interchanges in Sydney Airport’s terminals.</p>
Noise and Vibration - Amenity	<p>Construction impacts:</p> <p>Council is aware of the impact of construction fatigue to local residents caused by infrastructure projects such as the Sydney Gateway project.</p>

	<p>Qantas Drive, Joyce Drive and surrounding roads are major arterial roads and are proposed to be the site of where the majority of road diversions and construction work will be undertaken. Residents of the surrounding areas such as Mascot, and Botany have lived through a number of years of Airport East and North access construction and will now be impacted by a further 3 years with the construction of the Sydney Gateway project.</p> <p>Impacts to local traffic movement as well as construction fatigue will potentially have a detrimental impact on local business, liveability and human health as local streets and neighbourhoods are overcome by heavy vehicles, detours, construction noise and adverse visual impacts.</p> <p>30. Council requests that:</p> <ol style="list-style-type: none"> The proponent consider the cumulative impacts of recently approved projects and those currently under assessment and to work with Council staff to determine the projects that are to be considered in this assessment. Transport and traffic impacts of the project are regularly communicated to local residents and businesses, with a detailed timeline of the works and upcoming road diversions and should involve extensive community consultation. Measures be included to protect the safety of 'vulnerable road users' (pedestrian and bicycle riders) during construction and when detours are active. Construction compounds during the project period are considered for re-purposing to community open space, with accessible public facilities.
Place making and Urban Design	<p>Urban Design:</p> <p>The following comments are in relation to '<i>Technical Working Paper 13</i>' (TWP 13). Council requests that the EIS be amended to consider the following issues:</p> <p>General comments and recommendations:</p> <ol style="list-style-type: none"> Section 6.3 should be amended to expand on the unique qualities of the place including the history of indigenous culture, landscape/ environment (Botany Bay). In general, there is a disconnection between the objectives/ principles and the proposed strategies and structure plan in Section 6.4. This section should be amended to provide an explanation on how each proposals/strategies of the project meet the objectives. Include reference to Sydney's unique blue sky within Section 6.4. Botany Bay is named because of its large collection of variety of plants and this could be reflected in the landscape plan. Vivid Sydney is the largest festival of light and ideas in the southern hemisphere. The festival could be incorporated into the design of the lighting infrastructure. Figure 93 should be amended to ensure there is easy access/active transport provision for the community in Mascot Town Centre and the surrounds of the new park/ open space in Tempe. Tempe Lands precinct is not located within Bayside area (page 97). However, option 1 is preferred as it provide more recreational spaces for a variety of community needs. The location of the two mounds in option 1 can be viewed as an interesting landform sitting side by side from the Sydney airport and along the proposed active transport corridor. The two mounds in option 2 are bisected by an 8 lane overpass. <p>Trees:</p>

	<p>36. Bayside Council has one of the lowest levels of tree canopy amongst the metropolitan councils in Sydney. It is requested that a detailed Arboriculture Assessment is undertaken as part of this project. If trees are required to be removed, Council seeks consideration of a replacement ratio of 5:1. If suitable land in the direct area is not feasible for replanting, Council staff can assist in finding suitable replacement locations.</p> <p>Next stage:</p> <p>37. It is recommended that a detailed urban design and landscape plan be provided in the next stage. The plan should provide a more defined vision and design principles to the project. The plan should also provide finer details to guide the design for both built and landscape elements such as palette of colours. It should be ensured there is a consistent approach to landscape design, art installations, lighting are under same framework and design principles. It is recommended a more detailed analysis is provided of every identified built and landscape element, including its aspect, constraints and opportunities and provide design/landscape strategies that is suitable for that location. This process should be overseen by art curator(s) and landscape architect(s) throughout the project.</p>
Visual Amenity	<p>38. Council requests that the EIS be amended to consider the following issues:</p> <p>8.3.2 Viewpoint 1:</p> <ul style="list-style-type: none"> • Council request artist impression photo montage to show the proposed changes to the area • Concerns are raised about the loss of trees to the overall landscape of the area. <p>8.3.3 Viewpoint 2:</p> <ul style="list-style-type: none"> • Council requests an artist impression photo montage to show the proposed changes to the area <p>8.3.4 Viewpoint 3:</p> <ul style="list-style-type: none"> • Council requests an artist impression photo montage to show the proposed changes – option 1 and option 2 <p>8.3.5 Viewpoint 4:</p> <ul style="list-style-type: none"> • The future design of the noise barriers is critical to add visual interest and future landscaping. <p>8.3.12 Viewpoint 11:</p> <ul style="list-style-type: none"> • What will the space look like after the relocation of the cycleway? • The future design of the bridge should be sympathetic to the bank of the water course. <p>8.3.14 Viewpoint 12:</p> <ul style="list-style-type: none"> • Provide opportunities to incorporate art installation and lighting to the underbridge design. <p>8.3.15 Viewpoint 14:</p> <ul style="list-style-type: none"> • The future design of bridge can be seen as an opportunity to add the visual amenity to the Alexandra Canal. <p>8.3.17 Viewpoint 16:</p> <ul style="list-style-type: none"> • Ensure the existing vegetation will not be affected by the project.

	<p>8.3.18 Viewpoint 17:</p> <ul style="list-style-type: none"> • Opportunity to install an overhang built element over the bridge – similar to Melbourne international gateway project. <p>8.3.19 Viewpoint 19</p> <ul style="list-style-type: none"> • Concerns are raised about the visual impact of the removal of significant mature trees and replacement by a 4m tall retaining wall at the Botany Rail Line interface. • Support the idea that the retaining wall will incorporate 'living wall installations'. There is further need to ensure the living walls will be designed to allow for on-going maintenance. <p>8.3.27 Viewpoint 26</p> <ul style="list-style-type: none"> • Council request an artist impression photo montage to show the proposed changes to the area, including option 1 and option 2 mounds. • This is not only a view point from the Giovanni Brunetti Bridge looking north east along Alexandra Canal, the current Kogarah Golf Course will have a similar aspect looking north to the city. • Concerns are raised about the visual impact after the tree removal and the proposed mounds options. <p>Excellence in architectural design to minimise visual impact of the flyover structure</p> <p>Council has noted inclusions of natural, indigenous and artistic design in the EIS and support further efforts at visually pleasing and artistically significant components of the Sydney Gateway road project.</p> <p>Council requests that:</p> <ul style="list-style-type: none"> • The Sydney Gateway road project seeks further development of inclusion of urban design and architectural excellence in its final design
Socio-economic, Land Use and Property	<p>Reference is made to the following sections of the EIS:</p> <p>S7.1.1 The project and its alignment In relation to reference made to "Intersection upgrades or modifications" at:</p> <ul style="list-style-type: none"> • Link Road/ Airport Drive • Robey Street • O'Riordan Street/ Joyce Drive • Ross Smith Avenue <p>AND</p> <p>S7.11.2 Permanent Land Requirements Where reference is made within s7.11.2 to the requirement of 14.1 Hectares of State or Government owned land and 20.6 Hectares of Commonwealth owned land (for which Council may be the reserve trust manager).</p> <p>AND</p> <p>Figure 19.14</p> <p>Comment: 39. Council needs more detailed information in order to understand the full extent of impact of acquisitions, particularly to the roads named in s7.1.1, as not all have been included in the land requirements table 19.2. If acquisition of these roads/ other Bayside Council Land, be it Freehold, Leasehold, Strata, Stratum or any other form of interest, Council staff require:</p>

	<ul style="list-style-type: none"> • Diagrams specifically showing acquisitions of Bayside Council owned land • Timing, ie. commencement and term of acquisitions • Form of acquisition • Draft documentation, ie. leases, Section 30 agreement, MOU to begin negotiations • Description of how all of the acquisitions pertaining to Council will be wrapped up and managed • Environmental Management upon the sites • Make Good requirements of the sites • Traffic Management • Assets requiring removal or being affected <p>19.4.1 - Existing land uses and zoning <u>Open space/recreation</u></p> <p>Council understands that the impact to Bayside Council owned Open Space and Recreation uses is nil based on the proposed project details provided.</p> <p>These impacts are present within adjoining Inner West Council's LGA.</p> <p>40. Council requests RMS to provide a statement confirming this is required.</p>
Heritage	<p>Heritage Status</p> <p>The Heritage Impact Assessment of Aboriginal Heritage identified two sites with a high potential to contain archaeology of Aboriginal significance.</p> <p>These have been identified as Investigation Area 1 and Investigation Area 2.</p> <p>Council is currently undertaking an Aboriginal Heritage Study of Bayside and has undertaken sensitivity mapping which includes the Airport, however the mapped sensitive areas appear to be outside the study area.</p> <p>There is one item listed in the Botany Bay LEP 2013 within the study area:</p> <ul style="list-style-type: none"> • Sydney (Kingsford Smith) Airport group – I170. <p>There are two items listed on the Botany Bay LEP 2013 located within the vicinity of the proposed works:</p> <ul style="list-style-type: none"> • Alexandra Canal (incl. sandstone embankment) – I1 This item is located approximately 15 metres away from the boundary of the study area. • House – “Daktari” – I131 This item is located 100 metres away from the study area. <p>There are two items shown on the heritage map of the BBLEP which are located away from works and are not affected.</p> <ul style="list-style-type: none"> • Commonwealth Water Pumping Station and Sewerage Pumping Station – I3 • Ruins of the former Botany Pumping Station – I168. <p>According to the Heritage Impact Statement the following item has been removed and was originally located 100 metres from the study area. The removal is confirmed by aerial photography.</p> <ul style="list-style-type: none"> • Mature Ficus, 112 High Street, Mascot Lot 2, DP 593694 Local I130 <p>Assessment <u>Sydney (Kingsford Smith) Airport group – I170.</u></p> <p>The Kingsford Smith Airport Group at Mascot is a complex cultural landscape that demonstrates strong historical, historic association, social, aesthetic and technological significance. It includes both the values associated with contemporary airport and the heritage values associated with the layers of use of the area.</p>

	<p>The airport is a complex site covering over 900 hectares, with buildings, structures, features and elements that contribute to its heritage values. The following structures are within the curtilage:</p> <ul style="list-style-type: none"> • <i>Botany Water Pumping Station Ruins and Chimney Ruins;</i> • <i>Engine and Mill Ponds and Mill Stream from Botany Road to the point where it enters Botany Bay;</i> • <i>Sewage Pumping Station No. 38;</i> • <i>Main North-South Runway and East-West Runway;</i> • <i>The left bank of Alexandra Canal extending from its confluence with Cooks River to the railway bridge;</i> • <i>Southern and Western Suburbs Ocean Outfall Sewer (SWSOOS) No. 1 & 2, comprising that section extending from Cooks River to General Holmes Drive;</i> • <i>Former ANA Terminal and Control Tower (Building 60);</i> • <i>Third Control Tower & Fire Station (Building 119);</i> • <i>The Fourth Control Tower (Building 239);</i> • <i>Sydney Airport Control Tower (Fifth Control Tower) Building 496;</i> • <i>Buildings 108, 109, 110, 111, 112, 113, & 114, 128 & 143 between Sixth and Seventh Streets. Electricity Substation (Building 325) Ninth Street;</i> • <i>Building 92 Mechanical/ Maintenance Workshop;</i> • <i>Fifteen figs (FICUS RUBIGNOSA and FICUS MACROPHYLLA), associated with the former Ascot Racecourse, located near the helicopter facilities. Other trees including Norfolk Island Pines, Canary Island Palms and a Chinese Redwood (METASEQUOIA GLYPTISROBOIDES) located between the helicopter facilities and the SWSOOS;</i> • <i>Keith Smith Avenue layout;</i> • <i>Lauriston park sub-division layout.</i> <p>The heritage impact statement (the report) states that the Sydney Airport Heritage Management Plan 2009 (the plan) attributes some of the above items such as buildings, structures trees and subdivision as having little or no significance. The plan has not been provided and was unavailable at the time of this assessment. The statement also refers to policy within the plan and makes an analysis of the gateway projects compliance. The report only mentions some policies so it isn't clear whether there are other relevant policies which have not been discussed.</p> <p>The plan is over 10 years old and accepted practice is that conservation management plans should be reviewed between 5 and 7 years. There is a 2018 draft management plan but this has not been used in the report's assessment. This document is also unavailable.</p> <p>Recommendations:</p> <p>41. The submitted Aboriginal Heritage assessment indicates that the 6,000 dugong remains and stone axes found very close to this area are an isolated find, rather than – as is more likely – being indicative of other archaeological remains in the area. A more detailed Aboriginal Heritage Assessment is required to exclude the possibility that the dugong remains and axes are isolated finds.</p> <p>42. The Sydney Airport Heritage Management Plan 2009 should be made available to Bayside Council for comment to ensure there are no inconsistencies between the plan and the state heritage inventory record. This is particularly important as some items listed in the SHI form are proposed for demolition.</p> <p>43. The Draft Sydney Airport Heritage Management Plan 2018 should also be made available to Council for comment, and to ensure the significance of the buildings and structures proposed for demolition have not been revised to have a higher degree of significance.</p>
Biodiversity	<p>The subject area represents an opportunity for Bayside to collaborate with the Proponent in increasing the biodiversity values of the area.</p>

	<p>Vegetation: <i>'Technical Working Paper 14 Biodiversity'</i> indicates that the project would remove about 0.91 hectares of native vegetation. It should be noted that Bayside Council has the lowest vegetation canopy within the Sydney Basin and it is therefore recommended that the proponent commit to vegetation projects to increase the biodiversity value of this area. Bayside is committed towards greening the LGA, and encourages the proponent to work with Bayside to develop revegetation projects.</p> <p>Bayside is already restricted with its ability to increase the vegetation cover due to the presence of Sydney Airport and Port Botany. By developing another Sydney road project after 2 recent completions, it has the potential to further decrease the connectivity and movement of species as well as prevent future greening projects to be considered. Given the overall footprint of this project, and lack of requirement of any offset planting to occur, Bayside is seeking commitment from the Proponent to consider greening this project in the final design.</p> <p>Aquatic Biodiversity: 44. Bayside Council would like to see proactive measures to include regenerating and naturalising waterways as well as use of permeable surfaces.</p> <p>Terrestrial Biodiversity Council recognises corridors such as Coastline Corridor, Mill Stream and Botany Wetlands are connections between habitats allowing for species movement, their protection is necessary for ecosystem functions.</p> <p>Council is in the process of establishing protection mechanisms around the Green Grid enhancing biodiversity and ensuring ecological resilience. The direct impacts on fauna and their habitats, summarised in Table 22.4 Chapter 22 of the EIS, is a setback for Councils future obligations.</p> <p>45. The proponent should provide further information on the alternative measures will be in place for additional foraging habitat for the Grey-headed flying fox, eastern Bent Wing-Bat, as well as mangroves.</p> <p>46. The EIS and relevant Technical Working Papers should be updated to reflect the green grid priority corridors and include objectives which refers to the 'enhancement of surrounding terrestrial biodiversity' in line with District Plan.</p>
Flooding	<p>The EIS identifies that the operational flood impacts for Qantas Drive and Robey Street will not increase flood levels. However the flood risk will increase as the impact will be higher due to the increased number of vehicles and therefore people exposed to the existing flood hazard. The impact of the increased flood risk include more vehicle accidents, greater risk to life and more traffic delays. The risk to life will be to road users but also first responders including Council staff, traffic controllers, SES and Police.</p> <p>Options to reduce the current level of flooding have not been explored sufficiently. Comments in the EIS include that the mitigation is 'constrained by the impact this would have on flooding in Sydney Airport due to displacement of floodwater'.</p> <p>47. Alternative flood mitigation options should be investigated to reduce the operational flood risk.</p> <p>The impact of future climate conditions is significant and the mitigation measures have been left for future management. This is a short term view that will limit the options available for flood mitigation in future. If the current flood hazards are mitigated there will be more resilience in the road network to cope for the impacts of climate change.</p> <p>Council is aware of the following serious flood issues:</p>

	<ul style="list-style-type: none"> • At the Robey Street underpass the depth of flooding in is 0.2-0.3m in a 1EY event (1 exceedance per year) and over 1m in a 10% AEP event. • Qantas Drive sag 2, during a 10% AEP event the depth of inundation is 0.8m. Based on depth alone this is defined in ARR 2016 as hazard category 3 – unsafe for vehicles. Even in a more frequent 50% AEP event (1 in 2 year) the depth is 0.5m. This is particularly significant given the long duration of inundation (more than 2.5hrs in a 20% AEP flood). • The active transport link will pass under Nigel Love Bridge and be 2m lower than existing ground levels, an existing low section of this active transport link are already subject to flooding in high tides. The proposed mitigation involves flood barriers either side of the path which will result in large walls and an unsafe and unattractive active transport link. <p>To highlight the risk of roads being flooded it's important to recognise that driving a vehicle through 0.15m of water can cause it to become unstable and driving a vehicle through 0.6m of water can make it buoyant with the potential for it to tip over and consequently submerge its occupants. Over a ten year period from 2004 there were 159 drowning deaths involving flooding across Australia and over half these were as a result of driving through flood waters.</p> <p>(Source: https://www.royallifesaving.com.au/data/assets/pdf_file/0004/22000/RLS_Floodwater_ReportLRv3.pdf)</p>
Water – Hydrology and Quality	<p>Cooks River Catchment:</p> <p>48. Further information should be provided to address how the Proponent is seeking to work with relevant agencies in achieving the long term aspirational goals for the catchments, whether they relate to Cooks River or Georges River, given that they all share Botany Bay and its catchments.</p> <p><i>'Technical Working Paper 8 Surface Water'</i> outlines that aquatic ecosystems in Alexandra Canal (within the Cooks River catchment, which receives the majority of the project area discharge) are currently 'highly disturbed'. Bayside recognises this project as the opportunity to re-engage with the public realm over the Alexandra Canal, as it recognises it is a vital connecting open space between LGAs. This would require increase permeable surfaces in public domain upgrades particularly those adjacent to these waterways.</p> <p>Water Quality:</p> <p>49. Council has a strong commitment to regenerate and protect Bayside's waterways and riparian corridors in its Community Strategic Plan. Bayside has more than 60% hard surfaces across the LGA and is facing increased growth pressures in the short term.</p> <p>Regeneration and protection of the waterways should be considered in further detail by the applicant.</p> <p>Council notes that at Table 4.2 the Environmental Protection Authority <i>"recognised the highly disturbed nature of the receiving waterway (Alexandra Canal)"</i>. Council would like to highlight that although Alexandra Canal is highly disturbed, this water ends up in Botany Bay, less than 2km away, and this fact must be reflected in any water quality controls and treatment requirements of surface water and groundwater discharge from dewatering prior to entering Alexandra Canal, and ultimately Botany Bay.</p> <p>Section 7.10.9 – Water Quality Measures, states that <i>"all water quality measures would be developed in accordance with the principles of WSUD and with the aim of achieving the water quality targets in the 'Botany Bay and Catchment Water Quality Improvement Plan'"</i> with a disclaimer <i>"...subject to feasibility during the detailed design"</i> which negates the requirement to implement these requirements. Given that the runoff from</p>

	<p>this will enter Botany Bay, the words “<i>subject to feasibility during the detailed design</i>” need to be deleted so that design aims to meet the ‘Botany Bay and Catchment Water Quality Improvement Plan’ targets.</p> <p>Hydrology: 50. Council encourages better construction techniques and stormwater management practices to align with the principles of Water Sensitive Urban Design.</p>
Contamination	<p>The contaminated land assessment and the proposed management process follows best practice and guidelines adopted by the NSW Environment Protection Authority. There are appropriate conceptual site models for areas with known contamination, former Tempe Landfill, Sydney Airport northern lands carpark, land north of the rail corridor, and Sydney Airport land. It is proposed to complete Remediation Action Plans at the detailed design stage and prepare and apply relevant chapters in the Construction Environmental Management Plan.</p> <p>The project involves excavation of 90,000 cubic metres of waste material from the former Tempe landfill, and it is proposed to temporarily store these material prior to re-use if suitable on the development site in the form of mounds covering an area of 3 hectares.</p> <p>51. Council requests that any transfer and movement of these soils and waste materials from one site to another within the development footprint meets the applicable requirements of the NSW Waste Classification Guidelines and the <i>Protection of the Environment Operations Act</i> and Regulations requirements at the minimum in addition to all EPA Guidelines adopted under the <i>Contaminated Land Management Act</i>.</p>
Air Quality	<p>52. Any licence controls and environmental criteria for dust control need to consider the cumulative impacts of the project work sites operating at the same dates and times rather than each in isolation.</p> <p>53. Odour from dewatering needs to be considered and managed for impacts on potential residential receivers e.g. dewatering within developments in the area have encountered issues with hydrogen sulfide odours to residential premises. This issue needs to be considered in an Air Quality Management Plan within the Construction Environmental Management Plan.</p> <p>Council notes that DPI&E recommended the following “<i>investigating alternative management measures other than discharge into surface water (Alexandra Canal)</i>”.</p>
Sustainability	<p>Carbon Offsets: There is no mention of any carbon offsets from the impact of construction.</p> <p>54. It is recommended that the proponent consider partnerships with organisations for producing renewable energy to offset this cost.</p>
Climate Change Risk	<p>Urban heat island effect: Given that this project is almost certain to increase the urban heat with increasing temperatures coupled with urbanisation it is likely to have an impact on Bayside’s vulnerable community members as well as liveability.</p> <p>55. It is requested that consideration is given to heat reduction approaches such as rain gardens, natural cooling systems, heat reflective materials and colours. Best practice design guidelines as well as water sensitive urban design features should be implemented.</p>

General comments in relation to contamination, air quality, noise, ground water and acid sulfate soils

56. Council acknowledges that the issues of air quality, contaminated land and groundwater and acid sulfate soils have been addressed suitably for this level of report. However, as there are many technical reports for these issues, including odour assessments and remedial action plans, and further investigations for contaminated soil

and groundwater that will be provided during the detailed design phase, it is requested that Council be involved in the review of these documents prior to finalisation and approval for use for the construction project.

57. In addition, some of the affected receptors are strata properties in multistorey structures, and therefore there are many more potential receivers of dust, odour and noise than indicated as there are multiple units within one affected property, especially around the Wolli Creek area. This needs to be reflected in any environmental assessments, management measures and licensing of night works by the NSW EPA.

Conclusion

It is acknowledged that the objectives of the Sydney Gateway road project are to support the international gateways of Port Botany and Sydney Airport and reduce traffic congestion. However, Council considers the Sydney Gateway Road project inconsistent with a number of key objectives and planning priorities in the Eastern City District Plan as the project is not considered to provide adequate consideration to the provision of active transport connections and public transport opportunities; the protection of habitat and terrestrial fauna; the health of the district's waterways; and the delivery of green grid connections.

In relation to local strategic planning, Council raises concern that the Sydney Gateway road project does not assist in achieving the Planning Priorities of the Bayside Community Strategic Plan 2030, and draft Bayside Local Strategic Planning Statement, particularly in relation to lack of benefit to the Bayside local community via provision of active transport networks; lack of access to the Cooks River Intermodal Terminal; and unacceptable impacts on level of service at key intersections both during construction and at completion.

Council has provided a number of recommendations that should be considered by the proponent and during the assessment of the project.