



DOC20/626891

5 August 2020

Ms Katherine Klouda  
Senior Planning Officer  
Transport Assessments  
Department of Planning, Industry and Environment  
GPO Box 39  
Sydney NSW 2001

Dear Ms Klouda

**Sydney Metro Chatswood to Sydenham – Modification 8 –  
Blues Point Access Site (SSI 7400 Mod 8)  
EPA Advice on Modification**

I am writing to you in reply to your invitation to the Environment Protection Authority (EPA) to provide advice on the above modification request.

The EPA understands that the modification would provide for an extension of works at the Blues Point site for a further 12 months by providing an access portal for tunnel fit out materials. This was not contemplated in the original EIS.

The current project approval allows 24 hours a day, 7 days a week (24/7) works for some aspect of the development through condition E48.

The acoustic shed was constructed following approval of SSI 7400 Modification 5 and has been partially disassembled by the Tunnel and Station Excavation (TSE) contractor. It would be reinstated as part of the current modification request.

The proposed tunnel fit out works from the Blues Point site are stated in the modification to include:

- *Concrete pours to form the track slab and rail fastening*
- *Rail installation and fixing*
- *Cable and equipment installation*
- *Overhead traction power installation*
- *Other equipment installation including lighting (including emergency lighting), drainage, and fire and life safety systems (including walkways connecting to emergency egress and fire hydrant systems).*

*The tunnel fit out works would be undertaken by Sydney Metro's Line-Wide Contractor, Systems Connect (joint venture between CPB Contractors and UGL).*

While the Modification Report does include statements indicating that concrete deliveries will be limited to standard hours, it keeps the possibility for out of standard hours concrete deliveries open. Other material would be delivered 24/7.

**Phone** 131 555  
**Phone** 02 9995 5555  
(from outside NSW)

**Fax** 02 9995 6900  
**TTY** 133 677, then  
ask for 131 155

PO Box 668  
PARRAMATTA  
NSW 2124

4 Parramatta Square  
12 Darcy Street  
PARRAMATTA NSW  
2150 AUSTRALIA

**info@epa.nsw.gov.au**  
**www.epa.nsw.gov.au**  
**ABN 43 692 285 758**

The EPA notes that Modification 5 recognised that limiting the coverage of 24/7 works at the sensitive Blues Point site was desirable and achievable as noted in condition E48 and E48.1 below (SSI 7400 Mod 5 edits in purple):

### **24 Hour Construction**

**E48** Notwithstanding Condition E36 of this approval and subject to Condition E47, the following activities may be undertaken 24 hours per day, seven (7) days per week:

- (a) tunnelling and associated support activities (excluding cut and cover tunnelling, and excluding the installation and decommissioning of the Blues Point acoustic shed except where compliance with Condition E44 is achieved);
- (b) excavation within an acoustic enclosure (excluding the Blues Point temporary site except where compliance with Condition E44 is achieved);
- (c) excavation at Central (excluding Central Walk works at 20-28 Chalmers Street, Surry Hills) without an acoustic enclosure;
- (d) station and tunnel fit out; and
- (e) haulage and delivery of spoil and materials.

**E48.1** Notwithstanding E48(a), the Proponent must use best endeavours to schedule annoying activities, including steel hammering and movement of the self-propelled modular trailer, at the Blues Point temporary site between 7am and 8pm.

The Modification Report appears to simply refer to existing planning conditions as the basis for 24/7 activities as opposed to exploring opportunities to limit hours of operation and associated impacts on the community. To further support this proposal, the proponent should be required to examine opportunities to reduce hours of operation of the Blues Point site where feasible and reasonable to reduce impacts on the community.

The EPA recommends that DPIE carefully examine whether the subject works, which were not contemplated within the EIS, fall within the meaning and intent of the 24/7 allowances in condition E48 and whether 24/7 works are justified. The EPA has concerns about cumulative impacts from out of hours noise.

It is noted that conditions E84 and E85 required consideration of non-road transport options for spoil haulage etc. to minimise impacts associated with road transport. Consequently, barging activities from the Blues Point site were implemented by the TSE contractor. It is noted that barging is not proposed for this aspect of the proposal and that concrete and other material deliveries will be via local roads.

The Modification Report concludes the following for construction traffic impacts:

*“The construction traffic impacts during and out of peak periods are considered to be consistent with the assessment in the Environmental Impact Statement however traffic movements would occur over a longer duration due to the extended use of Blues Point temporary site for 12 months as the access for tunnel fit out works. No additional traffic or cumulative traffic impacts are anticipated as a result of the extended duration of the use of the site.”*

However, it should be noted that the traffic predictions in the EIS were not actually realised because alternative means for spoil haulage were identified and implemented. Off-site traffic impacts are managed via the planning approval and should be considered by DPIE in the modification determination. The EPA notes that the construction traffic assessment has essentially relied upon the assessment in the EIS and has not specifically considered the current proposal in the modification request.

The modification report assesses construction noise and vibration at Section 5.2. Table 8-3 presents “Residential Noise Management Levels (based on ICNG)”. The noise management levels do not appear to be consistent with the *Interim Construction Noise Guideline* (EPA, 2017) for out of standard work periods. The assessment of airborne construction noise in the modification report has been

qualitative only. This is considered inadequate to enable an assessment of potential noise impacts. Ground-borne noise and vibration has not been assessed, however the EPA notes that the activities are not likely to produce significant levels of vibration.

Specific consideration of noise mitigation measures for site activities has been deferred to the preparation of a Construction Noise and Vibration Impacts Statement as required under the current planning approval.

Based on the information contained in the Modification Report, the EPA is unable to determine the adequacy of the noise impact assessment, likely impacts, or adequacy of proposed mitigation. The EPA recommends further detailed assessment be undertaken in support of the proposed modification.

The EPA would be pleased to discuss this advice further with DPIE. To arrange a meeting or please contact Anna Timbrell on 9274 6345 or email [anna.timbrell@epa.nsw.gov.au](mailto:anna.timbrell@epa.nsw.gov.au)

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Claire Miles', with a stylized, cursive script.

**CLAIRE MILES**  
**Unit Head, Regional Operations – Metro North**  
**Environment Protection Authority**