

SUBMISSION

SYDNEY METRO WEST

Sydney Metro West Concept and Stage 1 EIS



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EXECUTIVE SUMMARY

This submission details the City of Canada Bay Council's review of *The Sydney Metro West Concept and Stage 1 Environmental Impact Statement - Westmead to The Bays and Sydney CBD* (the EIS), on public exhibition from 30 April to 26 June 2020.

Sydney Metro West is a major public transport project linking Greater Parramatta and the Sydney CBD. Once complete, the underground rail line will double rail capacity between the two CBDs, linking new communities to rail services. The location of 7 proposed Metro West stations have been confirmed between Westmead and The Bays, with 3 of those stations located in the Canada Bay Local Government Area: North Strathfield, Burwood North, and Five Dock.

Sydney Metro West will be transformative for the residents of Canada Bay; providing increased access and connectivity for residents, business and visitors. In-principle, Council welcomes this NSW Government investment in public transport in the City and the benefits it will bring, once operational.

However, Metro West is a significant infrastructure project that will have substantial construction and operational impacts for the City of Canada Bay. This submission outlines these expected impacts and details key concerns the Council has with the EIS. These include:

- the naming of the station at Burwood North and the currently unknown location of a services facility between Five Dock and The Bays;
- the impact of corridor preservation on development;
- insufficient time for stakeholder and community engagement and impacts of COVID-19 on the EIS consultation; also the need for ongoing consultation;
- the need for further detail and consultation regarding place-making opportunities at the 3 stations within the LGA;
- significant impacts on the local traffic network, and the inadequate assessment of traffic impacts, including the loss of parking during construction;
- major impacts from construction noise and vibration, especially on residents and sensitive land uses and the under-estimation of these impacts;
- ensuring Heritage (Aboriginal and non-Aboriginal) concerns are addressed appropriately;
- the assessments of impacts in business and community land uses, which underestimates the likely impacts and need for further mitigation measures;
- the failure to take into account the significant and costly impact of groundwater drawdown on the base flow in St Lukes Canal and Council's recycled water system;

- the need to further explore substantial opportunities for biodiversity enhancement, including increasing the tree canopy; and
- the need to explore further measures to reduce carbon emissions from construction.

It is imperative that Council's concerns are addressed, with additional environmental assessment carried out as required, prior to the approval of the Concept and Stage 1 application. Council has also proposed additional and amended mitigation measures, which are detailed in this submission.

INTRODUCTION

Sydney Metro West (Metro West) will be an underground rail line connecting Greater Parramatta and the Sydney Central Business District (CBD), doubling rail capacity between the two CBDs, linking new communities to rail services and supporting employment growth and housing supply.

Of the seven confirmed station locations between Westmead and The Bays, the three stations at North Strathfield, Burwood North, and Five Dock are located within the City of Canada Bay Local Government Area.

This submission relates to the Environmental Impact Statement (EIS) for:

- The Concept application, which seeks approval for construction and operation of a Sydney Metro line from Westmead to the Sydney CBD.
- The Stage 1 application, which seeks approval for all major civil construction works between Westmead and The Bays, including station excavation and tunnelling.

It is noted that the concept environmental assessment within Chapter 8 is high level and generic in nature. Council's comments are generally focused on the more detailed and specific locational impacts outlined in the remaining chapters of the EIS.

It is expected that a future Stage 2 application will seek approval for all stations, depots and rail systems between Westmead and The Bays. This would be followed by a Stage 3 application to seek approval for all major civil construction works between The Bays and the Sydney CBD Station.

1. STRATEGIC CONTEXT

About the City of Canada Bay

The City of Canada Bay is a vibrant and diverse city in the heart of Sydney's inner west. With many parks and reserves, our City is surrounded by river foreshore and is located only 7 kilometres from the Sydney CBD.

The traditional owners of our City are the Wangal clan of the Dharug people, who hold a deep connection to the land, river and foreshore.

Our City has many areas of unique character, including the suburbs of North Strathfield, Concord and Five Dock. Generally these suburbs have experienced little change and are characterised by established, low-density housing, including original Federation Bungalow and Inter-War Californian Bungalow dwelling houses.

In 2016, the estimated residential population of the City of Canada Bay was 88,015 (2016 Census), having grown rapidly from a population of nearly 54,000 in 1996. In recent years there has been an increase in apartment living, particularly in Rhodes, but also in Local Centres and close to Parramatta Road. We also have significant commercial and retail areas that provide jobs for local residents and workers from the wider metropolitan area. Our Strategic and Local Centres include Concord, Drummoyne, Five Dock, North Strathfield and Rhodes/Concord Hospital, amongst others and provide lively hubs for work, dining, entertainment, health and other social and cultural activities.

Jobs within the LGA are provided across a range of sectors including health and education, office, retail and hospitality. Knowledge-intensive jobs form the highest proportion of employment and are increasing.

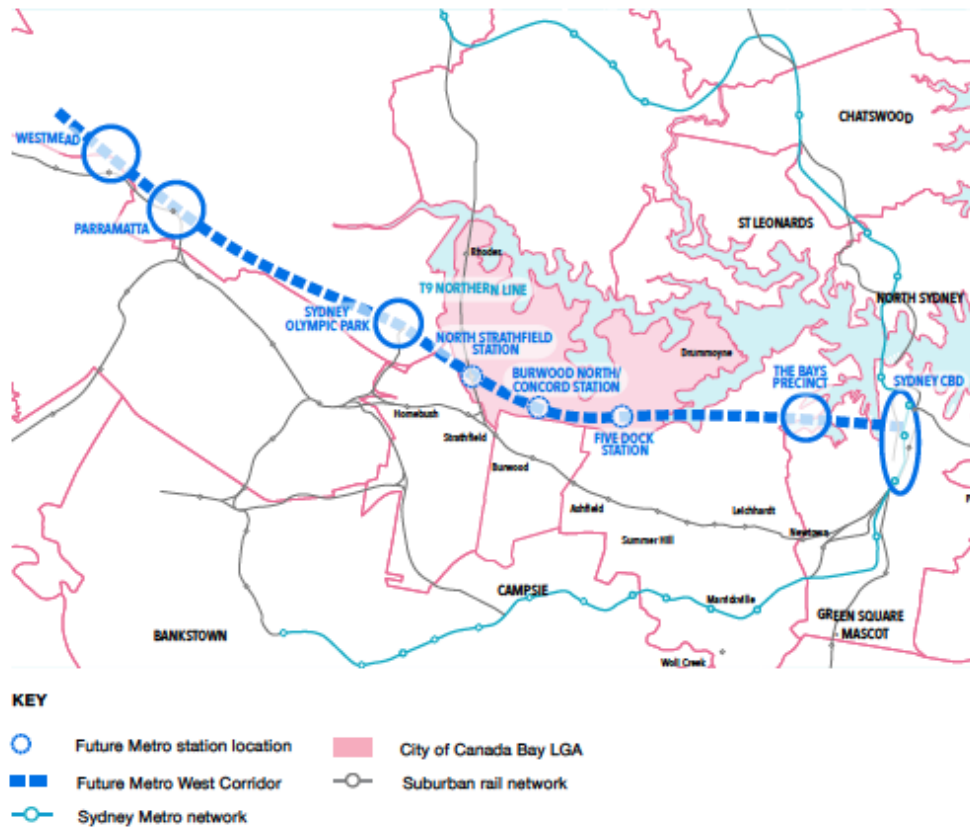


Figure 1: Location of City of Canada Bay LGA with Metro West Stations

Strategic plans

Our Community Strategic Plan, *Your Future 2030* is an overarching plan for the future of the City of Canada Bay. The Plan has 5 key vision areas that are aligned with the aspirations and priorities of our community. They are:

- Inclusive, involved and prosperous
- Environmentally responsible
- Easy to get around
- Engaged and future focussed
- Visionary, smart and accountable

The *City of Canada Bay Local Strategic Planning Statement (LSPS)*, completed earlier in 2020, is the core strategic planning document for the City of Canada Bay. It will guide the character of our centres and neighbourhoods into the future and implement the priorities and actions of the Eastern District Plan at a local level. The LSPS can be accessed at <https://www.canadabay.nsw.gov.au/localplanning>

The LSPS sets out our land use vision:

- Create great streets, places and buildings for people
- Plan for a diversity of housing types and affordability

- Protect and enhance local character
- Connect and strengthen neighbourhoods and centres
- Align growth with the delivery of infrastructure
- Ensure Sydney Metro West delivers “density done well”
- Improve access to the Parramatta River foreshore
- Facilitate sustainable development and renewal
- Increase biodiversity and the urban tree canopy.

The LSPS sets out 19 planning priorities and associated actions for the City of Canada Bay. Of relevance to Metro West is Priority 1: Planning for a city that is supported by Infrastructure, and 11: Identify land use opportunities and implications arising from Sydney Metro West.

Both Your Future 2030 and the LSPS recognise the importance of **connectivity, inclusion, sustainability and local character** to the Canada Bay community. The LSPS envisages Metro West and its associated renewal, as “density done well”. The City’s LSPS vision and priorities should be referred to throughout the planning stages of Metro West as they provide, in a broad sense, the outcomes that Council would like to see delivered by the project.

Recommendations

- It is recommended that Your Future 2030 and the City of Canada Bay LSPS are used as a reference and guide to understanding the community land use vision and aspirations for Canada Bay in the refinement of Stage 1 and further planning and design of Metro West, including to inform the Stage 2 EIS.

2. BENEFITS OF METRO WEST FOR CANADA BAY COMMUNITY

Metro West will be transformative for the residents of Canada Bay; providing increased access and connectivity for residents, business and visitors. In-principle, Council welcomes this NSW government investment in public transport in the City and the benefits it will bring, once operational.

A significant proportion of Canada Bay residents (79% in 2016) travel to work outside of the LGA. However, due to the current lack of transport choice and minimal public transport provision, the LGA has a high level of car ownership and 65% of all trips are made by private vehicle.

Metro West will increase the availability of alternate transport modes and will play an important role in achieving the Canada Bay LSPS priority to 'improve connectivity throughout Canada Bay by encouraging a modal shift to active and public transport.'

When complete, Metro West will connect the residents of Canada Bay with employment opportunities outside of the LGA and will also benefit local business through providing faster and more accessible public transport for employees and customers. Planned urban renewal around station precincts will also provide job opportunities and increase the local population, creating demand for new retail and services.

Increased connectivity will make the LGA a more attractive place to do business and is likely to benefit the local economy, through increasing patronage and local access to recreation facilities and events.

However, as discussed in section 12, this is likely to also bring management challenges through the increased use of sports and community facilities, as well as spikes in visitors at peak times, such as during the annual Ferragosto festival and sporting season finals at Concord Oval and our regional playing fields.

More widely, Metro West will provide new public transport links between Paramatta and the City, assisting in reducing carbon emissions and air pollution in the long-term, and improving socio-economic opportunities for communities serviced by the route.

3. STATION & SERVICES FACILITY LOCATIONS AND NAMING

Council is generally supportive of the station locations as reflected in the LSPS Structure Plan as *Future Metro station locations* and *Future Metro West Corridor*.

Service facility location

The Services facility is noted in the EIS as ‘somewhere between Five Dock and the Bays’ and remains unidentified. Council is not aware of a suitable site for this facility with the Canada Bay LGA, although it is understood the location is more likely to be in the Inner West Council LGA.

In its 8 November 2019 submission to the Secretary's Environmental Assessment Requirements (SEARs) Council made the following request for the EIS:

‘The proponent should identify the location of the proposed service facility/emergency egress proposed between Five Dock and The Bays and address consequential impacts arising from the facility’.

This request has not been actioned in the EIS, and in Council’s opinion, this renders the Stage 1 Environmental Impact Assessment incomplete.

Council’s submission to the SEARS also noted that *‘There is no land between Five Dock and the foreshore of Iron Cove that would be appropriate for the siting of such a facility given the low density residential nature of the locality and impacts that would arise as a consequence of the need to accommodate vent stacks, water tanks for fire suppression, emergency exits and access for emergency services.’*

Naming of Burwood North

Council is of the view that the name ‘Burwood North’ is a confusing title for a station located in Concord. There is no existing suburb or location known as Burwood North recognised by the Geographical Names Board and this is likely to cause difficulties with wayfinding. It is also disorienting having two station names in succession with ‘North’ in the title as this may cause confusion for travellers alighting at North Strathfield and Burwood North stations.

Any change to the suburb name of Concord is likely to be resisted by Council and residents and therefore Council strongly recommends the station name for Burwood North be changed. It is suggested the name ‘Concord Oval’ be used for this station location, after the oval located to the east of the station.

Concord Oval is a landmark in the immediate vicinity of the proposed metro station and is currently undergoing a \$50+ million redevelopment. The Oval is home to the Wests Tigers Rugby League club and once redevelopment of the oval is complete, it will be a major destination and trip generator for Metro West. The name ‘Concord Oval’ is well recognised within the community and would provide a unique address for this station.

Recommendations

- Identify the location of the proposed service facility/emergency egress proposed between Five Dock and The Bays and undertake a modification and supplementary Environmental Impact Assessment that is available for public comment.
- Rename the proposed 'Burwood North' Station to 'Concord Oval' to correctly refer to the location of the proposed station, reduce confusion and improve wayfinding.

4. IMPACT OF CORRIDOR PRESERVATION

The EIS sets out an underground corridor for the Sydney Metro West project which will be protected by the Infrastructure SEPP *once project approval is granted*. Concurrent to the EIS exhibition period, the Department of Planning, Infrastructure and Environment (DPIE) is exhibiting an amendment to the Infrastructure SEPP to extend the protection of the corridor to the interim period *before project approval is granted*. This will extend the following provisions of the SEPP to this interim period:

- consent authorities to notify Sydney Metro of certain development applications within the interim corridor.
- Sydney Metro to provide concurrence on notified development applications before they can be determined by a consent authority. This will require applications with works that penetrate the ground to a depth of at least 2 m below ground level, or that have a capital investment value of more than \$200,000 to be referred to Sydney Metro for comment.

Council understands the intention of the amendment is to ensure that development does not occur within the interim corridor which could subsequently prevent, compromise or increase the costs of delivering Metro West. Once approval for the project is granted by the NSW Government, the corridor will be preserved in perpetuity and the above requirements will remain in place.

Council is concerned that both the temporary and permanent provisions could cause delays to development projects along the corridor. The corridor traverses land identified for growth under the Parramatta Road Corridor Urban Transformation Strategy (PRCUTS, 2016) and potential future growth around Metro stations.

The impact and implications for future development need to be further considered in this context and concurrence processes discussed with Council to minimise time impost for landowners, developers and Councils.

Recommendations

- Consult further with Councils and the DPIE team responsible for PRCUTS implementation regarding the impact of corridor preservation.
- Ensure steps required for Development Applications to achieve concurrence under the Infrastructure SEPP are simple and clearly articulate the criteria that Sydney Metro will use to determine the suitability of proposed development in the corridor.

5. STAKEHOLDER AND COMMUNITY ENGAGEMENT (CHAPTER 5)

Council is concerned that an 8-week public exhibition period for the EIS is insufficient. Whilst longer than the statutory 28-day exhibition period, 8 weeks is not sufficient for review and comment on an EIS of this scale and technicality.

Having 3 proposed stations within its boundary, Council is a key stakeholder for the Metro West project. To meet the submission deadline and our own meeting deadlines, Council was required to prepare this submission in a very tight timeframe. The deadline for submissions has limited the level of detail that can be provided in our comments, and we would like to request that a continuing dialogue takes place after the formal submission deadline. This is compounded by COVID-19, which has placed substantial pressure on Council, business, organisations and institutions. Social distancing requirements have made it difficult for the proponent and Council to consult with affected communities.

We understand that Sydney Metro, through its Place Managers, is undertaking consultation with affected schools through the Department of Education and separately with businesses likely to be affected by property acquisition. Other education providers and health/aged care institutions surrounding the station locations should also be engaged. Innovative engagement methods need to be used currently in light of social distancing requirements.

Many individuals, organisations and businesses across the Metro Corridor are struggling to manage during the highly unusual circumstances of COVID-19 lockdown and Council asks that particular effort is made to engage directly with affected parties at this time. We would also request leniency where extensions are requested to the time for comment.

Council will be seeking for Sydney Metro to uphold its commitment outlined in chapter 5, to *'continue to work with stakeholders and the community, the intention to prepare a Preferred Infrastructure Report if required, and intent to consult with stakeholders to fulfil mitigation measures.'* Mitigation measures are critical to the long term wellbeing of our community and Council expects this to be honoured, noting the statement in the EIS that once the *'Concept and stage 1 are approved, Sydney Metro would continue to consult with the community and key stakeholders during construction and planning or future stages'*.

Recommendations

- That NSW Major Projects are lenient with the deadline for public comment on this EIS, accepting submissions beyond the closing date of 26 June.
- In recognition of Council's role as a key stakeholder for Metro West, regular and ongoing consultation be established between Sydney Metro and Council, including leading up to the preparation of the Stage 2 EIS.
- Sydney Metro commit to engage further with businesses, community and other stakeholders regarding the Stage 1 EIS, in particular with companies and institutions

located with a 400m radius of the metro stations, using innovative methods in light of COVID-19.

- Ensure the engagement strategy for the remainder of the project is widely shared with the community.

6. PLACE-MAKING: OPPORTUNITIES FOR NORTH STRATHFIELD, NORTH BURWOOD AND FIVE DOCK PRECINCTS (CHAPTER 7)

The City of Canada Bay is supportive of the general approach to place making detailed in Chapter 7: Place-making of the EIS.

Council supports:

- The revitalisation of the public domain around station locations that is integrated with the wider community.
- Stations contributing to place outcomes through activation and facilitation of retail/commercial uses.
- The commitment to integrating green infrastructure with metro stations and facilities, thereby improving connectivity to the Green Grid.
- The incorporation of cultural design, the interpretive approach to heritage, public art & sustainability.
- Crime Prevention Through Environmental Design (CPTED) principles being embedded as part of station and public domain design.

We are committed to working closely with Sydney Metro, stakeholders and the community to develop these outcomes as part of future detailed design and planning processes.

The Canada Bay Local Strategic Planning Statement (LSPS) identifies Sydney Metro West as a significant infrastructure project that will have important land use implications. The following action is of direct relevance to any concept approval being granted as part of this EIS:

‘Prior to rezoning occurring, a local planning study is to be prepared and endorsed by Council for the localities in which a Sydney Metro West station is proposed, including development sites and their immediate surrounds. The local planning study is to include:

- *the preparation of a desired future character statement prepared in consultation with the community;*
- *identify opportunities and preferences for new and / or improved areas of open space within, adjacent to or surrounding the new Metro locations;*
- *identify opportunities for and facilitating improvements in the public domain to maximise pedestrian amenity, movement and experience;*
- *establish preferred land uses within and around the new Metro locations;*
- *consider opportunities for a diverse range of housing that is consistent with the desired future character of the area and determine the contribution of any new housing to the regional housing target;*
- *ensure that the employment functions and services around station locations are supported and enhanced as a result of the Metro project;*

- *establish preferred built form outcomes within and around new Metro locations; and*
- *identify the need for further studies or considerations resulting from transport infrastructure.'*

The Place and Design Principles for each station will ultimately transform the localities where they are applied and will play a significant role in informing future works above ground. As future stages of the West Metro project will be assessed against these Place Principles, it is fundamental that they facilitate outcomes envisaged by endorsed Government Strategies, community consultation and precinct planning earmarked by Council.

It is requested that the Place Principles for all station locations and specifically for Burwood North and North Strathfield be strengthened to include the following additional requirements:

All stations

To achieve relevant objectives of the Eastern City District Plan and Council's Local Strategic Planning Statement, any Master Plan prepared for land above or around station locations should facilitate the delivery of increased urban tree canopy, both on private land and in the public domain.

It is requested that the following Place and Design Principle be added for all station locations in the City of Canada Bay:

'Facilitate an increase in the urban tree canopy and landscaping in the public domain'.

'Ensure all station locations include end of trip facilities for bicycles and ease of access for those who choose to cycle.'

Burwood North

The Burwood North precinct is located within the Burwood/Concord Precinct under the Parramatta Road Corridor Urban Transformation Strategy. This Strategy identifies new open space on Burton Street within the block in which the Burwood North metro station is proposed to be located.

Sydney Metro West provides a unique opportunity to provide public open space that is co-located with the metro station. This open space would ideally comprise a new north facing pocket park on Burton Street that is integrated with a civic plaza where entry is provided directly to the Metro station. To achieve this outcome, it is important that any open space does not have a sole frontage to Parramatta Road and is located to achieve solar access in mid-winter, in accordance with accepted best practice urban design outcomes.

It is requested that the following Place and Design Principles be added for Burwood North

'Ensure future open space located adjacent to the Metro station has a high level of solar and acoustic amenity'

'Deliver new north-south at grade connections as part of future above station development'

North Strathfield

Council's Social Infrastructure Strategy for Open Space and Recreation found that the North Strathfield area has an open space provision of 0.5 sqm per person and the majority of the land on the eastern side of the station is not within 400m of local open space. As the works to North Strathfield station have the potential to reduce the quality and area of the existing open space on Queen Street, it is fundamental that the concept approval provide certainty in relation to how open space will be reinstated in this location.

The metro station is ideally located to replace the existing open space with a new plaza on Queen Street. This plaza would facilitate access to the station/s and provide an important civic and neighbourhood function for the North Strathfield centre.

It is recommended that the principle '*Support an active public domain area focused on Queen Street*' be replaced with:

'Support an active public domain area focused on Queen Street through the provision of a civic plaza/station entry'.

Council sees Metro West as an opportunity to improve accessibility and a sense of place at each location. Wayfinding will be an important part of this approach but is not specifically addressed in the EIS. Similarly, each station provides an ideal platform for exploring local stories and narratives, including local Aboriginal cultural history. It is important for public art to be integrated into future development, be place-based and in line with local art strategies

Council also has a number of relevant plans that should be taken into consideration, including street scape proposals for North Strathfield and Five Dock and the redevelopment of Concord Oval. We would welcome the opportunity to enter into an Interface Agreement to inform ongoing discussions between Council and Sydney Metro regarding changes to Council's civil infrastructure.

Recommendations

- Add the following additional Place and Design Principles for North Strathfield, Burwood North and Five Dock:

All stations

'Facilitate an increase in the urban tree canopy and landscaping in the public domain'

'Ensure all station locations include end of trip facilities for bicycles and ease of access for those who choose to cycle.'

Burwood North

'Ensure future open space located adjacent to the Metro station has a high level of solar and acoustic amenity'

'Deliver new north-south at grade connections as part of future above station development'

North Strathfield

'Support an active public domain area focused on Queen Street through the provision of a civic plaza/station entry'.

- Work closely with Council and the community to develop urban design and place concept plans for the three station locations, as part of a wider precinct-based

approach and incorporating the findings of Council's *Sydney Metro West Planning Study*.

- Work together with Council to ensure the urban design and place making strategy for relevant station locations is consistent with the Parramatta Road Corridor Urban Transformation Strategy and emerging work being prepared by Council to implement the Strategy.
- Outline the approach to be taken for wayfinding, the integration of public art and CPTED principles, with further detailed information provided in the Stage 2 EIS.
- Require an Interface Agreement to be prepared between Council and Sydney Metro to inform changes to Council's civil infrastructure arising from construction works and post construction outcomes
- Consider temporary art projects that improve amenity and encourage a sense of place, such as artwork on hoardings.

7. IMPACTS ON THE LOCAL TRAFFIC NETWORK (CHAPTER 10)

Metro West may be a catalyst for a major mode shift to public transport in Canada Bay. It will provide a key interchange facility at North Strathfield, allowing easy transfers between the T9 Northern Line at North Strathfield and the Sydney CBD.

The success of Metro West will largely be dependent on maximising opportunities for interchanges, improved connections to existing bus and rail services and active transport. It is vitally important that these links are planned ahead and provided for alongside this project, in consultation with local government and communities.

Whilst it will bring many benefits, Metro West will have a significant adverse impact on local traffic and transport networks, particularly during construction. This includes impacts from loss of parking, congestion, noise, and impacts on active transport and accessibility. Once the project is operational, changes to local traffic movements and parking will also impact local networks.

Council's key concerns regarding the Concept and Stage 1 EIS transport assessment are highlighted below.

Car parking

- Insufficient provision is made for construction worker parking at the 3 stations. This was an issue during the construction of Westconnex through the LGA. It is considered an even higher risk for the Metro West station locations, especially at North Strathfield and Five Dock which already experience higher pressure for parking. During the consultation stage of the EIS scoping, Council specifically requested detailed consideration of this matter, but the EIS lacks a detailed quantitative assessment and provides inadequate solutions.
- The three strategies identified in the EIS are likely to be ineffective. Similar measures were adopted for the construction of Westconnex through the Canada Bay Council area, yet high demand for parking still occurred around construction sites, negatively impacting residents. It is imperative that further detail and mitigation be employed to avoid a repeat of the construction parking impacts arising from previous major infrastructure projects in Canada Bay.

Increased congestion and noise

- Increased traffic movements at all 3 station locations will lead to noise and congestion impacts on local street networks and disruptions to existing traffic movements, including bus movements. Impacts on local education providers (schools, colleges, childcare centres) will be particularly significant. Sydney Metro will need to closely liaise with these stakeholder to develop tailored mitigation measures for each location.
- The 24/7 nature of construction necessitates close consultation with Council, Transport for NSW and the local community to minimise the noise and vibration

impacts from heavy vehicle movements. This is addressed in section 8 of this submission.

Impacts on active transport and access

- The EIS notes potential impacts on walking and cycling routes, including a range of temporary diversions. Further discussion should be undertaken with Council and the community to minimise impacts on pedestrian and cycle access.
- Impacts on vehicular access to businesses, homes and facilities must also be minimised via consultation and the development of detailed Construction Traffic Management Plans and Traffic Control Plans.

Impact on road surfacing

- Sydney Metro needs to further consider the impact of substantial heavy vehicle movement on the road surface of local and regional roads and come to an arrangement with local councils about the restoration of roads, post-construction, alongside any other damage caused to footpaths, public domain or other council facilities.

North Strathfield

- The configuration of the intersection of Wellbank Street and Queen Street is designed to deter regional traffic and is not suited to heavy vehicle movements. An assessment is required of the impacts of reconfiguring this intersection to allow construction traffic, and the impacts on traffic flow in the area that will occur when traffic and pedestrian priorities are changed.
- The relocation of the existing pedestrian crossing on Queen Street to the south side of Wellbank Street will require multiple road crossings for pedestrians to travel between the shops and the station. Installing traffic signals is the most appropriate treatment to accommodate current and future traffic and pedestrian movements in this location. It would be preferable to implement the 'final' configuration of this intersection in these initial stages to minimise ongoing disruption.
- The plans indicate the temporary closure of the footpath on the west side of Queen Street. Crossing facilities on the south side of the roundabout at Beronga Street will be required during the closure.
- Section 4.12.5 of Tech Paper 1 indicates the loss of approximately 20 on-street parking spaces on Queen Street between Wellbank Street and Pomeroy Street. Figure 4-33 also indicates a temporary relocation of the bus stop and it isn't clear what will happen to the 'Kiss and Ride' park also located here. Relocating these car parking spaces, bus stops and kiss and rise spaces will erode the availability of parking and should be assessed.

Burwood North

- Night-time truck volumes (up to 14 heavy vehicle movements per hour) will negatively impact residents. Consideration should be given to alternate truck routes to minimise this. For example, allowing the currently prohibited right turn

movements from Burwood Road southbound into Parramatta Road. This would be the most direct truck route and avoid use of residential streets.

- Section 4.13.5 indicates that about 4 on-street parking spaces would be temporarily removed on the western side of Loftus Street adjacent to the Burwood North Station northern construction site boundary. These spaces are time-restricted to 30 minutes.
- Outside of peak hours, parking is permitted on the east and west sides of Burwood Road immediately north of Parramatta Road. However, the assessment of parking loss in section 4.13.5 only indicates the loss of 4 parking spaces in Loftus Street and does not acknowledge the loss of parking associated with changes in Burwood Road, including bus stop relocation. As such, the parking loss will be greater than indicated and it is important that the EIS assess the true extent of the impact.
- Historically traffic congestion has occurred on Burwood Road southbound approaching Parramatta Road, particularly outside of peak hours mid-morning. This is contrary to typical trends and not investigated by the traffic assessment which has focused on the conventional AM and PM peak peaks.
- The intersection of Burton Street and Burwood Road already causes congestion, and this will only increase during construction. This has previously been identified as a constraint by Council as well as by TfNSW through the Bus Priority Program. Traffic signals at this intersection should be investigated.

Five Dock

- Five Dock is a thriving centre which is heavily reliant on the availability of on-street parking for customers and visitors. Parking studies on and around Great North Road have found parking demand in many locations typically exceeded 85% capacity. With core construction hours starting at 7am, construction workers are likely to occupy unrestricted parking early, causing difficulties for business employees and their customers to park.
- Solutions could include the redevelopment of Kings Street carpark in Five Dock to a multi storey carpark or the implementation of a permit parking scheme for residents (and their visitors) and businesses - both would require funding.
- P63 of Tech Paper 1 incorrectly indicates “parking spaces on the eastern side of Great North Road are not time-restricted”. This parking is in fact generally restricted to ‘1/2P’ as part of the ‘Area’ parking restrictions that apply on Great North Road through the commercial area.

Unforeseen impacts

Whilst the EIS includes assessment of some of the above-mentioned issues, there will be additional unforeseen impacts that have not been addressed and where there is no mitigation identified. Therefore, a close and responsive working relationship with Council will be required to minimise disruption to the community, businesses and Council throughout the construction period and early stages of operation.

Recommendations

- Further consider the above detailed comments for each station location and address in detailed planning via site-specific Construction Traffic Management Plans and Traffic Control Plans.
- Consult closely with Council, Transport for NSW, education providers, businesses and the local community in the development of the site-specific Construction Traffic Management Plans and Traffic Control Plans for each station location and precinct, and for special events. This must include detailed planning and mitigation to minimise impacts on congestion, noise, active transport routes and parking and access.
- Undertake a detailed assessment of impacts of construction worker parking for each affected station locality and identify, in consultation with Council, viable mitigation measures and solutions for parking.
- Consider impacts of substantial heavy vehicle movement on the road surface of local and regional roads. Undertake a condition assessment of road surfaces prior to construction and ensure restoration of surfaces or appropriate compensation is provided to Council.
- Provide a process for mitigating unforeseen impacts to the local traffic and transport network that involves responsive communications with Council and steps in place for resolving issues.

North Strathfield

- Undertake modelling and a redesign of Wellbank Street and Queen Street intersection, North Strathfield, in consultation with Council.
- Consider installing traffic signals instead of a pedestrian crossing on Queen Street to the south side of Wellbank Street, North Strathfield.
- Provide pedestrian crossing facilities on the south side of the roundabout at Beronga Street.
- Reassess the loss of 20 on-street parking spaces on Queen Street between Wellbank Street and Pomeroy Street, taking into consideration the kiss and ride and bus stop requirements.

Burwood North

- Consider alternate truck routes at night to minimise disturbance, including allowing the currently prohibited right turn movements from Burwood Road southbound into Parramatta Road.
- Consider traffic congestion that occurs on Burwood Road southbound approaching Parramatta Road, particularly outside of peak hours, at mid-morning.
- Acknowledge the loss of parking associated with bus-stop relocation in Burwood Road.
- Consider installation of traffic signals at the roundabout at the intersection of Burton Street and Burwood Road.

Five Dock

- Develop mitigation measures to increase parking in Five Dock to accommodate construction works, e.g. the redevelopment of Kings Street carpark in Five Dock to a multi storey carpark or the implementation of a permit parking scheme for residents (and their visitors) and businesses.
- Ensure a Traffic Control Plan is developed for Ferragosto, held annually in Five Dock.
- Amend p 63 of Tech Paper 1, which incorrectly indicates “parking spaces on the eastern side of Great North Road are not time-restricted”. This parking is in fact generally restricted to ‘1/2P’ as part of the ‘Area’ parking restrictions.

8. IMPACT OF NOISE AND VIBRATION ON COMMUNITY, BUSINESSES AND LEARNING (CHAPTER 11)

Noise impacts during the Metro West construction stage are a major concern for the Canada Bay community. Consultation prior to, and during the construction period will be critical in ensuring that the community, organisations and businesses are prepared for the high level of impacts and overall timeframe for construction works. This matter is also addressed in Sections 11 and 12 of this submission, which discuss impacts on businesses and the community.

Whilst mitigation measures for noise are outlined in the EIS, Council has significant remaining concerns about the impacts of construction noise and vibration from excavation, tunnelling and truck/ traffic movement arising from Stage 1 works. In all three station locations, there are important and sensitive receptors including residents, schools, childcare centres and aged care facilities, as well as businesses, community facilities and churches. It will not be possible to adequately mitigate the effect on many of these uses and it may instead be necessary to consider relocation or temporary hibernation of some uses, supported by Sydney Metro.

The EIS indicates that some works, especially those involving the tunnel boring machines and waste removal, will occur on a 24/7 basis or during the night-time. This is likely to cause sleep disturbance and substantially disrupt the community, leading to health and wellbeing impacts.

Mitigation measures outlined in the EIS include the application of the Sydney Metro Construction Noise and Vibration Standard, possible negotiated respite periods, and acoustic sheds in areas where works outside of standard construction hours will be undertaken and where there are sensitive receivers. Ongoing monitoring will be essential and Council requests that flexibility is built into the process to ensure community concerns can be accommodated, for example through provision of respite periods and a 24-hour phone line. Further clarification around the temporary eased construction hours permitted by the NSW Government due to COVID 19 and applicability to the project is also required.

Whilst tunnelling and excavation noise will be most prominent within 400m of the station locations, noise impacts due to the proposed use of trucks used for deliveries and haulage of waste 24 hours a day will affect a wider geographical area, including some quiet residential streets.

Condition reports

All landowners of property that may be affected by cosmetic or structural damage from vibration impacts must have the opportunity of obtaining a pre-construction condition report.

There is lack of trust in the community relating to major infrastructure projects arising from the real and perceived impact of damage to properties arising from Westconnex.

Where a request is made by a landowner for a pre or post-construction condition report, it is important that the report be prepared by an independent expert and not an expert appointed by Sydney Metro. Consultants engaged by Sydney Metro are not considered by the community to be sufficiently independent for them to have confidence in the integrity of their work.

It is recommended that any project approval be granted subject to a condition that requires Sydney Metro to fund dilapidation reports prepared by consultants appointed by landowners. Alternatively, a panel of independent experts should be established. Where a landowner chooses to appoint an expert from the Panel, Sydney Metro should fund their engagement.

North Strathfield

The Stage 1 construction period for North Strathfield has a predicted duration of 18 months, however the EIS states that works will be limited to standard construction hours. Due to the shallow grade of the tunnel at North Strathfield, the EIS predicts 'high' worst-case noise impacts and exceedances of the human comfort criteria for vibration for homes close to the construction zone and exceedances for other sensitive receptors including schools. It is critical that Sydney Metro consult with all affected landowners in this location to minimise disruption from noise impacts throughout the day.

Burwood North

The Stage 1 construction period for Burwood North has a predicted duration of 2 years and 3 months and will involve some 24-hour works. The EIS predicts 'high' worst-case noise impacts for a small number of residences (1-2) and moderate and low impacts for other residences. 'Moderate' sleep disturbance impacts are predicted for some residences during night-time construction works. During both day and night, the most-affected residences in the LGA will be those in Burton Street directly to the north of the construction site, and it is critical that consultation occur with these landowners and affected businesses. Burton and Loftus St will experience a greater than 2dB increase in noise from road traffic noise. Please refer to comments under Section 7: traffic for recommendations to minimise night-time noise impacts from truck movements.

Five Dock

The Stage 1 construction period for Five Dock has a predicted duration of 2 years and 3 months and will involve some 24-hour works. The tunnel will also be relatively shallow at this location, resulting in exceedances of acceptable noise criteria. The EIS predicts 'high' worst-case noise impacts at the nearest receivers during higher noise generating activities, moderate impacts during the night-time, and potential exceedances of the human comfort criteria for vibration.

For construction traffic noise, roads anticipated to have a greater than 2 dB increase would include Second Avenue and Waterview Street to the east of the Five Dock Station construction site. The central location of the Metro site makes businesses and community uses particularly susceptible to noise impacts, including St Albans Church and the Council-operated Five Dock Library. It is essential that further consultation is held with Council and landowners/businesses to agree on a mitigation strategy for this location.

Concept/operation noise

The operational phase of the project will also result in increased noise in the station precincts and surrounding areas, from increased transport movement, pedestrians and increased development density, as well as noise generated from within the stations themselves and the trains. This will have a permanent, irreversible impact on locations surrounding all three of the stations within the City. This is discussed further in Section 12 of this submission in our response to social impacts.

There is an opportunity through station and precinct design and place-making measures to attenuate this noise, for example through materials choice, insulation and landscaping and appropriate siting of uses, and this potential should be explored during the Stage 2 project design and EIS.

Recommendations

- Sydney Metro needs to further consult with affected communities and businesses and the Council to determine best options for noise mitigation, monitoring and traffic management.
- Any project approval should be subject to a condition that requires Sydney Metro to notify and fund pre-condition and post-condition reports for all interested landowners of property that may be affected by cosmetic or structural damage from vibration impacts.
- Dilapidation reports should be prepared by consultants appointed by landowners. Alternatively, a panel of independent experts should be established and landowners invited to appoint an expert from the Panel to undertake pre or post construction condition reports.
- Provide periods of respite for affected residents, particularly those affected by night-time construction works.
- The 24/7 nature of operations needs to be further considered and addressed.
- A 24-hour phonenumber should be available for the community to register noise concerns.
- Ensure Council and the community are involved in the development of the noise and vibration monitoring program, and that the results are regularly made available to Council and the community.
- Ensure that the Stage 2 project design and EIS explore site and precinct-based placemaking and urban design measures to attenuate Metro West's operational and associated noise, for example through materials choice, insulation and landscaping.
- Confirm that the temporary eased construction hours permitted by the NSW Government due to COVID 19 will not apply to the Sydney Metro project given the potential for substantial additional impact on local communities.

9. NON-ABORIGINAL HERITAGE IMPACTS (CHAPTER 12)

Impacts on the non-Aboriginal Heritage within the City of Canada Bay include direct impacts on heritage fabric, and indirect impacts on the use of heritage items. There are few heritage items within Canada Bay likely to be directly affected by the project.

The EIS notes that tunnel sections between stations and service facilities would generally be too deep to affect heritage items or archaeological deposits, so these were generally excluded from the study area.

Whilst the overall approach to heritage is supported, Council has some remaining concerns that cosmetic or superficial damage may occur to some items, particularly to St Albans Church in Five Dock. It is important that all owners of heritage items along the corridor and within 400m of the works are made aware of and encouraged to have a condition report undertaken prior to construction works.

North Strathfield

The street trees near the proposed North Strathfield Metro Station are a heritage item and should be protected from harm during the works.

Burwood North

The Technical Paper 3 Non-Aboriginal heritage report notes that the inter-war Pine Inn Hotel at 19 Parramatta Road (c.1920), *'contributes to the character of the surrounding streetscape of the area'* and although *'substantially modified... Based on its historical significance, the Pine Inn could reach the threshold of local heritage significance'*.

This building is proposed to be demolished. Given its potential significance an archival record should be made and provided to Council.

Five Dock

St Albans Church and Rectory (both heritage items) are located adjacent to the proposed Metro Station and are particularly vulnerable. They have been identified in the EIS as buildings that have the potential to suffer from "superficial" but not "structural" damage due to excavation. While it is good that structural damage is not envisaged, there are many elements of a building (e.g. plasterwork, cornices) that are not structural but nevertheless make an important contribution to the architectural character of a building.

Noise arising from the proposed works has the potential to disrupt religious services in St Albans church, which make an important contribution to the heritage values of the church as they demonstrate community association with the building as well as its history and purpose. There are regular worship times as well as events such as funerals and weddings. The EIS, in Table 11-61 states that this impact can be mitigated by: understanding when noise would be a sensitive issue, considering measures that mitigate this issue and by implementing these where feasible and reasonable. It is preferred that discussions be held with the Parish in

order to determine their regular program of formal worship to ensure that noise does not occur during these times, or during funerals or weddings.

Recommendations

- All heritage items must be protected from harm during the proposed works. A schedule of protection measures for heritage items should be prepared in consultation with a built heritage specialist. These protection measures must include the protection of non-structural architectural elements as well as structural elements. Of particular concern is St Albans Church. Council should be advised of any proposed protection measures to be put in place, as well as the remediation approach in the case of damage.
- All owners of heritage items along the corridor and within 400m of the works should be made aware of, and strongly encouraged to have a condition report undertaken prior to construction works.
- A copy of any condition assessment reports prepared for heritage items located in the City of Canada Bay should be provided to Council.
- Council should be advised of any heritage items found to be structurally unsound, and a copy of the structural engineer's report provided to Council.
- Council should be advised of the mechanism for the implementation of remedies in the case of structural or superficial damage to heritage items.
- Protection measures for heritage items should be prepared in consultation with a built heritage specialist. All heritage items must be protected from harm during the proposed works. Council should be advised of protection measures put in place.
- The street trees (heritage item no. 397 under Canada Bay LEP 2013) located near the proposed North Strathfield Metro Station must be protected from harm during the works and the work undertaken in such a way as to ensure their health is retained.
- An archival photographic record of the Pine Hotel should be made and provided to Council. It should include plans of the hotel.
- The proponent should consult with St Albans Parish regarding noise impacts on religious services, funerals and weddings and determine if construction can be avoided during those times.

10. ABORIGINAL HERITAGE IMPACTS (CHAPTER 13)

Council notes that impacts on Aboriginal heritage have been minimised throughout the Metro West design process. Council considers that the assessment of any remaining potential impact on Aboriginal cultural heritage sites for Stage 1 works addresses the extent of Council's knowledge as documented in the City of Canada Bay Aboriginal Cultural Heritage Study and Masterplan (2006). However, it is noted that a review of the study is currently underway, which includes fieldwork and site inspections, so it is important that Sydney Metro contact Council for a progress update prior to commencement of works.

It is noted that the EIS indicates that no Aboriginal sites were identified within the City of Canada Bay extent of the Metro Corridor and therefore no known sites will be impacted by the Stage 1 proposed works or station locations.

The EIS sets out that a Heritage Management Plan will be prepared to accompany the Construction Environmental Management Framework, including as a minimum: procedures for undertaking any recordings of heritage items prior to works commencing, procedures for unexpected heritage finds, and heritage monitoring requirements. Council is supportive of this approach.

Recommendations

- Sydney Metro contact Council and the Metropolitan Aboriginal Land Council during the detailed planning of excavation works to ensure that any updated information arising from the review of the Aboriginal Cultural Heritage Study and associated site inspections is taken into consideration.

11. IMPACTS ON LOCAL BUSINESS OPERATIONS AND PATRONAGE (CHAPTER 16)

Whilst Metro West will bring long-term benefits to the local economy, and particularly businesses close to the metro stations, concern is raised in relation to the more immediate effects of the construction on business surrounding the 3 stations in the LGA.

Overall, Council considers that that the assessment of business impacts undertaken in Chapter 16 is inadequate, inaccurate and not sufficiently fine-grained in scope. It provides estimates only of numbers of businesses affected and lacks consideration of the severe impacts on particularly sensitive uses, such as health consultation services. The assessment of significance of impacts for the three locations within Canada Bay is under-stated, with most impacts assessed as being of 'minor negative' significance when clearly they will be much greater.

The year 2020 has been difficult for local businesses. The COVID-19 pandemic has led to a downturn in trade for many business and subsequent closures for those most deeply affected. Even with government stimulus, the economic impact on business has been high.

In this context and given the proposed commencement of works in Quarter 4 of 2021 (Burwood North and Five Dock) and Quarter 1, 2022 (North Strathfield), the project is likely to have a profound effect on business trading within proximity of the metro stations. Compensation and financial support from the NSW government for the worst-affected businesses must be provided.

There will also be the direct loss of some businesses due to acquisition for construction works and this may have a flow-on effect for business remaining, as people may choose to shop elsewhere if a particular service is unavailable. Therefore, it is critical that a well devised temporary way-finding signage and accessible pedestrian paths are installed to encourage community to continue accessing shops and services.

The EIS provides a list of potential impacts on businesses, ranging from direct acquisition, to temporary power and utility interruptions. The assessment is lacking also as it does not consider the loss of trade resulting from diversion of customers to less-affected centres, which is a likely scenario for a centre like Five Dock. In this centre, disruption arising from a long-term period of construction will have profound impacts on the operation of the central public space, Fred Kelly Place and businesses immediately surrounding the construction site.

North Strathfield

According to the EIS, 20-30 business are located within 100m and 60-90 business are located between 100 -400m of the construction site.

The risk assessment undertaken in relation to potential indirect impacts is inaccurate. Instead of the 'slight negative' significance assessment in the EIA, a 'moderate negative' impact is more likely for business directly to the east and west of the station, which include a pilates studio, café and speech pathologist, all sensitive uses that will be especially affected.

The impacts and loss of 20 on-street parking spaces combined with construction workers parking is likely to cause significant disruption and impacts on trade for businesses in this location.

Burwood North

According to the EIS, 20-30 businesses are located within the construction site, 30-50 business are within 100 metres and a further 20-40 are between 100-400m of the construction site. The loss of the Pine Inn, which is a key attractor in this precinct will reduce footfall generally throughout the precinct. The EIS has found only a 'slight negative' significance, yet it is likely that the impact on businesses in this locality will be 'moderate negative' and on some, the impacts will be 'large negative'.

Five Dock

According to the EIS, 10-20 businesses are located within the construction site, 80-100 businesses are within 100 metres and a further 100-150 are between 100-400m of the construction site. This is a total of up to 270 businesses. The EIS significance assessment states 'slight negative' for most impacts, and 'moderate negative' for impacts on temporary reduced local amenity.

Yet it is clear that the impact on these businesses is likely to be 'moderate negative' and for some business within the construction site and nearby the impacts will be 'large negative'. For example, the loss of parking is assessed as slight negative despite the loss of up to 34 parking spaces in the central business area of Five Dock, where parking is already close to capacity.

Particular concern is raised in relation to the impacts that will be caused by a large part of the central shopping strip of Great North Road being under construction hoarding for an extended period of time. Whilst Council acknowledges that hoardings are needed to manage the safety and amenity impacts arising from construction works, further needs to be done to address the consequential impacts on business. The interventions may range from regular pop up activities, a contribution to Council for the beautification of the centre (i.e. public art or embellishment of the streetscape) or direct compensation to affected businesses.

Recommendations

- A more detailed assessment of business impacts needs to be undertaken to address the points raised in this submission. This should be included in the Preferred Infrastructure Report.
- Mitigation measures, such as respite periods to minimise noise and disruption impacts should be discussed with both Council's Place team and local businesses and business chambers. These should be further detailed in the Preferred Infrastructure Report.
- Temporary place-making measures and public art should be included in all three station locations as part of the project mitigations, to improve amenity and encourage continues shopping and visitation. This includes temporary way-finding signage and accessible pedestrian paths to encourage community to continue accessing affected shops and services.

- A financial assistance/ compensation scheme must be provided by Sydney Metro for those businesses that will experience significant financial impacts during the Metro construction.
- Sydney Metro's Place Managers to provide Council with regular briefings of activities undertaken to assist local businesses throughout the project.
- Council requests a list of the properties to be compulsorily acquired (and associated business) to assist in understanding the broader business impacts on our centres.

12. SOCIAL AND COMMUNITY IMPACTS (CHAPTER 17)

The EIS approach to assessing social impacts is generally supported, however there are several important omissions and errors, including:

- The potential impact of the stations on local character and amenity has been omitted from the Chapter 8 operational concept assessment, as have consideration of mitigations for this.
- The assessment of corridor tunnelling works in Table 17-6 is inconsistent with the noise and vibration assessment in Chapter 11, which notes that tunnelling impacts will be greater at North Strathfield and Five Dock due to the shallow tunnel depth. It is optimistic for the EIS to assert that impacts of 24-hour tunnelling and excavation on way of life, health and wellbeing and surroundings is 'unlikely', of 'minor' consequence and 'low risk'.
- The impact of the metro station construction sites will be higher again. This will extend the Stage 1 operations over a longer period- to up to 2 years and 3 months in North Burwood and Five Dock. This will cause significant disruption to the way of life, health and wellbeing, socialising and events of the community, and their access to and use of open spaces, community facilities, services and businesses. The assessment for the 3 station locations substantially understates the significance and risk.

Sensitive land uses

The three station locations are characterised by a wide variety of residential and non-residential land uses, which are illustrated on the maps in chapter 17. This includes community and business uses that are especially vulnerable to noise, vibration and air pollution impacts. Sydney Metro must consult closely with the landowners and operators of these facilities (key uses detailed for each station location below) to minimise disruption and adverse effects on health.

Key sensitive uses

North Strathfield

- Residences within 400m of the station sites.
- Schools immediately to the west of the rail corridor, including the McDonald College and Our Lady of the Assumption Catholic Primary School.

Burwood North

- Residences within 400m of the station sites.
- Schools including MLC Junior School, St Marys Catholic Primary School.
- St Luke's Anglican Church and St Marys Catholic Parish Church.
- Concord Oval, Cintra Park, Goddard Park .
- A number of medical facilities along Burwood Road to the south, and Concord Private Hospital on Burwood Road.

Five Dock

- Residences within 400m of the station sites.
- Medical facilities in the town centre immediately adjacent to both construction sites, as well as in the surrounding residential areas .
- Cafes and restaurants fronting Great North Road and surrounding lanes and streets, in close proximity to both construction sites.
- Places of worship including St Albans Anglican Church and GGC Life Church, in the immediate vicinity of the construction site and the Five Dock-Drummoyne Uniting Church.
- Five Dock Public School.
- Five Dock Park.
- Key civic places such as Fred Kelly Place.

Health and Wellbeing impacts

In its submission to the SEARS Council made a request for the EIS to 'include a Health Impact Assessment (HIA), as part of the EIS that addresses construction and operational impacts.'

Council requested 'this address impacts of noise and vibration on physical and mental health (e.g. stress, annoyance and sleep disturbance), the potential impacts of dust and light pollution, and impacts on community cohesion and active transport. The HIA should include assessment of these impacts on sensitive and vulnerable individuals and groups, for example those with pre-existing health conditions.

Whilst some health and wellbeing impacts have been considered in the Social Impact Assessment, they have been addressed only in a high-level sense, and the assessment has failed to adequately address Council's above request.

Exposure to light pollution, whilst discussed in chapter 15 (Landscape Character and Visual amenity) is not considered in chapter 17 terms of its impact on health and wellbeing, despite there being potential for impacts.

In chapter 23- Air Quality, the potential unmitigated human health and nuisance impacts of dust impacts are described as medium risk, but this is not further addressed in the Social Impact Assessment.

Other potential health impacts include the potential impacts of construction on community cohesion and active transport, particularly for vulnerable groups, such as the aged or those with disabilities who may become isolated and feel unsafe near construction zones.

Council supports the proposed development of a Community Communication Strategy to provide continued community engagement prior to and during construction, so that the community are made aware of the multiple ways the project will affect them.

North Strathfield:

- The community has recently been impacted by construction of the WestConnex M4 East, so the cumulative impacts of infrastructure development should be considered.
- There are some inaccuracies and areas requiring further clarification in Table 17-12: North Strathfield Metro Station Construction site:

- On the western side of Queen Street, will the bus stop, park bench, bike lockers and accessible parking be removed and if so, will they be relocated?
- Way of life: Further details should be included regarding which bus stops would be subject to temporary changes; whether accessible parking spots will be removed; and whether accessible paths of travel will be maintained.
- The likelihood of impacts on community and access should be assessed as 'Likely', not 'Possible' and 'moderate'.

Burwood North:

- There are inaccuracies and information requiring further clarification in Table 17-13: Burwood North Station Construction site:
 - Assessment of community impacts should be 'Likely', not 'Possible'
 - Access to St Luke's Church should be considered under access to and use of infrastructure.
 - The likelihood of impacts on culture and on health and wellbeing should be assessed as 'Likely', not 'Possible'.

Five Dock:

- There are some inaccuracies and areas requiring further clarification in Table 17-14: Five Dock Station Construction site:
 - The social risk for Way of life, Community, Access and Health and wellbeing have been underestimated and should be assessed as 'High' or 'Severe', not 'Moderate'.
 - The risk for Culture and Surroundings has also been underestimated and should be 'Moderate' to 'High', rather than 'Minor.'
 - The risk for personal and property rights should be 'High' or 'Severe', not 'Moderate', given the scale of acquisitions required and noise impacts, particularly on business.
 - The impacts on Five Dock Library have not been adequately assessed. The noise impact assessment found it to be a highly noise affected receiver with potential vibration exceeding human comfort. Severe impacts on culture, wellbeing and access are probable. Some relocation of library services is likely to be required for the service to continue functioning.
- Section 10.5.4 needs to include Ferragosto festival, an annual major event of 110,000 visitors that results in the closure of Great North Road, Five Dock. Ferragosto is consistent with a Class 2 event according to Transport for NSW guidelines.

Recommendations

- Prior to project approval, re-assess the social and health impacts of tunnelling and station construction, particularly for locations with sensitive uses, as identified in the table above. Propose mitigations to reduce these impacts.
- Consult closely with the landowners and operators of sensitive facilities to minimise disruption and adverse effects.

- Provide Council with further information regarding the Community Communication Strategy, mentioned in chapter 17 as a mitigation measure.
- Include consideration of cumulative impacts of infrastructure development from Metro and the WestConnex M4 East, especially at North Strathfield.
- Further assess the impact on Five Dock Library and develop mitigation measures, including possible relocation of library services, in discussion with Council.
- Ensure recognition of the annual Ferragosto event in Five Dock as a major public event and assess accordingly.

13. IMPACTS ON HYDROLOGY AND FLOODING, GROUNDWATER (CHAPTERS 18, 21)

The EIS has not taken into account the impact of groundwater drawdown from Metro West on the base flow in St Lukes Canal and Council's recycled water system, despite Council having highlighted this matter formally during the EIS scoping stage. In its submission to the SEARS, Council requested the following:

c) The Proponent must identify the base flow in St Lukes Canal prior to the commencement of the project.

d) The Proponent must identify options to mitigate impacts on the flow rate in St Lukes Canal and identify opportunities for water reuse for open space irrigation.

Council's recycled water scheme provides over 200 Mega Litres a year of irrigation for 18 sports fields and 2 golf courses. This facility has been severely impacted by the Westconnex tunnels that have halved the base flow in St Lukes Canal from 11 litres per second to less than 5 litres per second. Council can no longer produce sufficient water for irrigation.

This loss of recycled water requires Council to use potable water to maintain a safe and playable surface on our sports fields. Council's potable water costs have increased by \$330,000 per annum as a result.

It is imperative that Sydney Metro identifies the base flow in St Lukes Canal and options to mitigate impacts on the flow rate in the Canal before the project is approved.

Opportunities for water reuse for open space irrigation, including water from the Metro Project should also be identified and discussed with Council.

The EIS notes the potential for overland flooding at North Strathfield, Burwood North and Five Dock Stations and this will need to be further addressed in the station concept development and stage 2 EIS, ensuring the project leads to no increase to flood risk in surrounding areas.

Recommendations

- Identify the base flow in St Lukes Canal and options to mitigate impacts on the flow rate in St Lukes Canal to Council's satisfaction prior to the approval of the project.
- Identify opportunities for water reuse for open space irrigation.
- Station concept design to include consideration of flood risk and ensure no increase to risk in surrounding areas.

14. BIODIVERSITY (CHAPTER 22)

A key tenet of Canada Bay's LSPS vision is to increase biodiversity and the urban tree canopy, which is in accord with the Canada Bay Biodiversity framework and Tree Canopy Strategy. The LSPS Planning Priorities include:

14. 'Protect and enhance bushland and biodiversity'

16. 'Increase urban tree canopy and deliver green grid connections'

Council is supportive of the overall environmental assessment approach to biodiversity, noting that impacts are expected to be low considering the highly urbanised landscape and given that most of the concept is underground.

However, the project provides an important opportunity for biodiversity enhancement. It is important that a greater emphasis be placed on increasing green infrastructure and tree-planting in station precincts, helping with urban cooling and meeting tree canopy cover targets.

Council has an adopted Urban Tree Canopy Strategy, which notes that Canada Bay's urban Forest covers over 18% of the Council areas, including public and private land. This is just below the 19% average cover across neighbouring Councils, and lower than the average for all Sydney Metropolitan Council areas of 27.5%.

The Strategy sets out a goal to increase tree canopy cover to at least 25% by 2040, an increase of over 6%, and lists priority suburbs for developing tree canopy cover, which includes Concord West and North Strathfield. Much of the increase will need to occur on streets and parks on public land.

The Strategy notes that Sydney Metro West will lead to increased development, threatening to reduce the existing urban forest, decrease available plantable space and put further pressure on existing public spaces. In anticipation of future increased development, it is imperative that the concept for Metro West includes a target to increase tree canopy.

As noted in section 13, above, Council is extremely concerned about the impact of groundwater drawdown on its recycled water supply. This will impact on Council's ability to provide water for the proposed increased tree canopy in the LGA .

Recommendations

- Include targets for increasing tree canopy across the Sydney Metro corridor on land to be acquired for the project, and work with Local Councils to develop landscape plans for each station location that increase urban tree canopy and offer opportunities for biodiversity enhancement.

15. SUSTAINABILITY, WASTE MANAGEMENT & CLIMATE CHANGE (CHAPTERS 24, 26)

Spoil, waste management and resource use

The overall approach to waste management in the EIS is supported and the waste principles for the project align with best practice waste management and the waste hierarchy, by prioritising reuse over recycling, and recycling over disposal.

The removal of waste and spoil during Stage 1 will have negative impacts. Of particular concern are the impacts of waste movement on the local road network (addressed in our comments on transport), increased noise (addressed in our comments on noise) and potential air pollution. Council expects Sydney Metro to employ best practice in implementing dust and pollution controls when managing waste and spoil.

The Stage 1 EIS contains limited information on the volume of waste generated, the locations for temporary storage, and destinations for recyclable material. While some of these issues, particularly demolition and construction waste for stations, are expected to be addressed in Stage 2 EIS, it is difficult to fully assess the likely impacts of waste management until further detail is provided.

The commitment to following the waste hierarchy should also be extended to the management of construction and demolition waste and related streams in Section 24.5.3.

Sustainability and climate change

The Council is committed to sustainability and to addressing greenhouse gas emissions generated both by Council operations and the City of Canada Bay Community. This commitment is set out in the Canada Bay Environment Strategy and the Emissions Reduction Action Plan, which sets out the following targets:

- Corporate target: Net zero emissions from Council operations by 2030
- Community target: Net zero emissions from the City of Canada Bay community by 2050

The Metro West will assist in meeting the community target of net zero emissions from the City of Canada Bay community by 2050 through encouraging a modal shift to public transport, particularly if combined with active transport and other public transport connections. Currently 19% of community emissions in the LGA are attributed to private transport. Through reducing these emissions, the overall concept of the Metro West is therefore positive for climate change.

For Stage 1 and subsequent stages, it is imperative that Sydney metro adopt measures to minimise carbon emissions and adopt best practice energy efficient design during the construction and operational stages of the project. Council is supportive of the measures

outlined, including a minimum Infrastructure Sustainability Council of Australia (ISCA) rating of 75, 5-star green rating, and requirement for consistency with ISO:20400 for procurement guidelines. However, emissions from construction materials are a substantial proportion of the project and it is essential that further measures are introduced, for example the use of lower and zero emissions concretes.

Chapter 8 discusses offsetting 25% of the emissions from electricity during construction and 100% of emissions during operations. A higher level of offsetting during construction should be instituted; also it should be made clear how these greenhouse gas emissions will be offset.

Council is supportive of the EIS response to the need for adaptation to the effects of climate change and account for climate risk outlined in Section 8:20:5. However, urban heat is a key issue for the LGA and, as outlined in Council's response to Placemaking (Section 6) and Biodiversity (section 14), increasing tree canopy and landscaping should be a vital part of the response to climate risk.

Council requests that it is further informed and engaged in the design and planning of sustainability measures for the project, particularly for stations within the LGA, as it progresses.

Recommendations

- Include key principles for reuse and recycling in Section 24.5.3 (in relation to management of construction and demolition waste and related streams) in addition to Section 24.5.1
- Consult with Council with regard to further waste management plans for demolition and construction, including details on volumes, temporary storage, transport and destination to ensure impacts on the local community are minimised.
- For further stages of the project, best-practice sustainable design and energy-saving buildings, including Green-Star certification should be a requirement for all stations and associated facilities.
- Provide details regarding how greenhouse gas emissions will be offset.
- Consult Council during the design of metro stations to ensure sustainability measures are implemented during both the construction and operation phases.
- Consult Council during the preparation of the Sustainability Plan and Design Quality Frameworks, for input on environmental management and monitoring and sustainable design.