



12 December 2021

Angela Stewart
Senior Planning Officer
Transport Assessments
Department of Planning, Industry and Environment

Dear Angela,

Re. Sydney Metro West – Civil Construction between The Bays to Sydney CBD (EIS)

Thank you for the opportunity to provide feedback on the Sydney Metro West - *Civil Construction between The Bays to Sydney CBD - Environmental Impact Statement (EIS)*.

Inner West Council is a strong supporter of public transport and commends the State Government for its vision of improving and expanding public transport across the Sydney Region and the Inner West. Council considers that Metro West is an essential element in the long-awaited opportunity to catalyse the revitalisation of The Bays Precinct and improvement of connectivity between several key economic centres in the Region. The provision of a reliable, user-friendly, *turn-up-and-go* transit system between Sydney CBD and Parramatta/Westmead is considered a genuine city shaping project. The ultimate goal of connecting with Western Sydney International “Nancy-Bird Walton” Airport (WSA) is also considered an essential enhancement of Sydney’s public transport network. Council, however, continues to seek a change to the existing “hub and spoke transport network”, with greater north-south and node-node connectivity.

Additionally, Council supports Sydney Metro West’s objective of delivering outcomes aligned with strategic land use and transport frameworks; fostering improved productivity by supporting new and existing strategic centres. In preparing this submission Council acknowledges that the EIS currently on exhibition is limited to the project’s civil construction work between the proposed Bays Station and Sydney CBD. Council also recognises that Metro West will subsequently provide an additional operation-based EIS, station designs and precinct plans, active transport plans and construction traffic management plans for further consultation with Council, and the Community.

Council considers that the *Sydney Metro West – Civil Construction between The Bays to Sydney CBD EIS* has adequately addressed many of the issues listed in the Secretary’s Environmental Assessment Requirements (SEARs).

This EIS’s reliance on several aspects of the original *Sydney Metro West Environmental Impact Statement – Westmead to The Bays and Sydney CBD (Sydney Metro, 2020a) EIS* (and the associated approval), as well as several key elements of this EIS, prompts Council to raise the following *Submission Points*. These points are raised either as concerns or items requiring more detailed attention. For ease of understanding the following submission highlights its key issues under a *Submission Points* subheading in each of the following sections.

General

While it is recognised that the existing practice is for details of construction management to be subject to further design development and construction planning, Council expresses concern that a project of this scale should not select the successful tenderer/joint venture partner before detailed design development and construction planning is completed.

The current approach, of appointing the successful tenderer prior to finalisation of designs, leads to a quote-based on the concept design (provided in the Preferred Infrastructure Report). Council's experience indicates that this often leads to a reluctance to modify designs in a manner which, though they may benefit the Community and the final outcome, are also likely to result in increased cost.

SUBMISSION POINT

- Council requests a commitment from the State Government to ensure that sufficient additional budget is provided to permit refinement and redesign to be successfully conducted and implemented.
- Council also requests that recognition be given to the current master planning process being carried out for The Bays West Precinct. In response to this recognition it is requested that a working group they established to guide the total area's development; which includes Inner West and City Councils, Sydney Metro, TfNSW and DPIE (as well as all other key agencies involved in the adjacent area).

Active Transport

A critical element to be considered in relation to construction impacts on active transport is the significant increase in heavy vehicle activity potentially conflicting with walking and riding.

SUBMISSION POINTS

- Council requests that the proposed hierarchy of access framework, for construction traffic management, should be included as a Condition of Approval for the project and that it should be applied to the adjacent road network as well as access to Metro's construction sites. Additionally, as recognised in the EIS, it is essential that safe, reliable, legible routes for public and active transport be maintained at all times.
- It is requested that:
 - all heavy vehicle drivers including subcontractors be required to undertake cycle and pedestrian awareness training, (for the sites), as well as supervised route orientation training;
 - all vehicles must be clearly identified, with such identification indicating:
 - that they are associated with the Metro West project (ideally including which site they are servicing);
 - a vehicle identification number;
 - contact details for the complaints/compliments hotline.
 - all heavy vehicles should have both high- and low-level mirrors to assist in reducing blind spots which may limit visibility of pedestrians and cyclists;
 - all heavy vehicles should be fitted with active, real-time GPS tracking;

- consideration should be given to the provision of GPS guided routing which specifically uses only the approved haul routes for each site.
- It is requested that future Construction Traffic Management Plans and active transport planning give specific consideration to:
 - the safety of any temporary footpath closures and diversions that may be required , particularly noting the need to provide a minimum of two weeks advanced notice to users;
 - The likelihood that Rozelle Railyards Park and the various active transport links to be built by WestConnex will become operational during the Metro West construction. Consequently, it can be anticipated that larger numbers of both commuting and recreational cyclists will be encountered in the area;
 - James Craig Road and Roberts Street have been noted to be used by road cyclists as a “training circuit”.
- The project should include provision for an all-weather active transport link between the proposed Bays Station and the Inner West Light Rail.

Air Quality

SUBMISSION POINT

In addition to Sydney Metro’s recognition of the need to manage and mitigate particulates, dust and odours as critical elements of air quality, it is requested that a real-time monitoring and rapid response mechanism be put in place to ensure immediate amelioration of resident and business concerns.

Biodiversity and Ecology

It is noted that this EIS largely relies on assessments carried out under the original *Sydney Metro West Environmental Impact Statement – Westmead to The Bays and Sydney CBD (Sydney Metro, 2020a)* assessment. Adding to this original assessment are statements relating to slightly increased risk of vehicle strike for mammals, reptiles, amphibians and birds.

Council considers that, while the Bays site is already an active construction area, care should still be taken to ensure consideration of the following submission points.

SUBMISSION POINTS

- It is considered that the cumulative impacts on biodiversity in this area will result in further deterioration and fragmentation of vegetation that is already segmented. The impacts of this issue have already been amplified as many areas of vegetation have been cleared for other projects such as Rozelle Interchange. While the original 2020 EIS referred to vegetation on and near the Bays site as “highly degraded” it is nevertheless habitat for numerous forms of fauna and should be preserved wherever possible. Specific attention should be paid to the potential for smaller animals to have now relocated to this site from vegetated areas that existed when the 2020 EIS was prepared but have since been removed.
- Consideration should also be given to the possibility that small birds and microbats may be harbouring in existing vegetation and abandoned buildings, undercrofts (and similar) and care should be taken to ensure both maintenance of their habitats and that construction activity does not disturb them.
- It should be particularly noted that Southern Myotis microbats (listed as vulnerable species in NSW) are found in several locations in Sydney Harbour including Sydney Fish Markets and

Mort Bay Park and are known to roost close to water in caves, mine shafts, hollow-bearing trees, storm water channels, buildings, under bridges and in dense foliage.

- Several other threatened species (Powerful Owl, Grey Headed Flying Fox, Large Bent-winged Bat) are also found in the Inner West and may use the area for foraging, nesting or roosting.
- Any vegetation to be removed should be removed in a phased manner to permit sufficient time for embedded fauna to relocate. This phasing should include remediation measures and the quantum of lost vegetation should be replaced, with equivalent planting provided to offset vegetation removed.
- All significant trees on, or adjacent to, the Bays site should be retained, however if construction activities necessitate their removal there should be a 5:1 tree replacement policy.

Community Consultation

Council supports the overall Community Consultation objectives outlined in the EIS, including its proposals for place managers, working groups, specific aboriginal consultation and preparation of a submissions report based on feedback obtained during exhibition of the EIS.

SUBMISSION POINTS

Council expresses concern that its previous experience with *Submissions Reports* and subsequent *Preferred Infrastructure Reports* has been less than satisfactory. The simplified manner in which submissions are often responded to in the *Submission Reports*, as presented by project proponents does not encourage Council or the Community to consider that the views expressed in submissions have been adequately examined.

Consequently, Council repeats its earlier request that the State Government examine opportunities to have *Submissions Reports* prepared by agencies other than the proponent agency.

Construction Activity

Table 5-3 of the EIS, indicates that the Bays Tunnel Launch and Support Site activities will include, tunnel boring, spoil removal, construction staff facilities and concrete segment storage, but not station excavation. It is therefore assumed that station excavation will be subsequently addressed.

SUBMISSION POINTS

- Council seeks further clarity on when and how the more detailed aspects of the already approved station excavation process will be addressed.
- While the hours specified for surface construction activity are generally 7am–6pm Monday to Friday and 8am–6pm Saturdays, with no work on Sundays or Public Holidays, Council’s experience with the majority of current major construction projects is that night-time construction activities can also be anticipated and that surface activities in support of the tunnelling will be conducted 24/7. Consequently:
 - it is considered essential that all *out of hours* noise and vibration generating activities should be clearly identified and that the Community should be provided at least two weeks’ notice prior to commencement of any activity;
 - while there is an undertaking to restrict construction activity to the standard business hours referred to above, Council requests that the noise and vibration assessment in the EIS recognise that the existing *Work from Home* regime initiated in response to COVID-19 is likely to result in a larger proportion of the population

working from home (than has previously being experienced). In considering this it should be noted that due to the socio-economic profile of Balmain, Rozelle and Pyrmont a proportion of the population will continue to work from home in the post-COVID period;

- Council considers that this project represents a significant potential impact on the adjacent Community and requests that Sydney Metro engage comprehensively with Council and the Community with a view to substantially reducing the number of *Out of Hours* noise exceedances and to minimise all impacts associated with these occurrences.
- Construction impacts on the communities of Balmain, Rozelle, Annandale and Pyrmont should be kept to an absolute minimum, particularly noting the high level of construction activity already the occurring around White Bay and Rozelle Bay.
- Council requests that ongoing discussions continue with relevant Council officers particularly in relation to construction impacts on traffic, groundwater, flora & fauna, noise & vibration, water and air quality.

Construction Traffic and worker parking

Council commends Sydney Metro for establishing the hierarchy of access for their Construction Traffic Management Framework, below:

1. *Incidents and emergency services access;*
2. *Events (special and unplanned);*
3. *Pedestrians;*
4. *Cyclists;*
5. *Other public transport users – buses, coaches and light rail;*
6. *Service vehicles;*
7. *Coaches (shuttle services to the site);*
8. *Taxis;*
9. *Kiss and ride and rideshare ;*
10. *Private cars.*

SUBMISSION POINTS (also included in part in this submission's Active Transport Section)

- Council requests that the proposed hierarchy of access, Construction Traffic Management Framework be included as a Condition of Approval for the project, and it be applied to the adjacent road network as well as access to Metro's construction sites, and that safe, reliable, legible routes for public and active transport be maintained at all times.
- It is requested that:
 - all heavy vehicle drivers including subcontractors be required to undertake cycle and pedestrian awareness training, (for the sites), as well as supervised route orientation training;
 - all vehicles must be clearly identified, with such identification indicating:
 - that they are associated with the Metro West project (ideally including which site they are servicing);
 - a vehicle identification number;
 - contact details for the complaints/compliments hotline.

- all heavy vehicles should have both high- and low-level mirrors to assist in reducing blind spots which may limit visibility of pedestrians and cyclists;
- all heavy vehicles should be fitted with active, real-time GPS tracking;
- consideration should be given to the provision of GPS guided routing which specifically uses only the approved haul routes for each site.
- As the Iron Cove Link will open during the Metro West construction period, it is requested that a significant review of construction traffic be carried out, once the link has opened, with a view to adapting construction traffic activity, particularly in relation to the potential impacts of construction traffic on active and public transport.

Additionally, it can be anticipated that active travel will alter significantly after completion of the Rozelle Railyards Linear Park. As construction at The Bays Station site is likely to extend beyond this time it is requested that the above review include consideration of activity likely to be generated by the linear park.

- As the construction peak is expected to be between 7-9am, 4.30-6.30pm Mon-Fri, Council requests that modelling also take into consideration the weekend midday peak, which is considered a critical time in this area.
- While the modelling provided indicates minimal delays at the Robert Street/Victoria Road intersection, delays exiting the Balmain Peninsula onto Victoria Road remain a key concern. Consequently, Council seeks a detailed response from the proponent indicating measures proposed to minimise these delays and compensate the Community for their reduced accessibility to the Balmain Peninsula.
- While the EIS suggests that construction worker parking management (such as a shuttle bus) will be provided, it is considered that insufficient details are available regarding the likely number of construction workers and any significant management initiatives, to ensure there is no impact on kerbside space for the local Community. Recent experience with the WestConnex Rozelle Interchange project has indicated that simple mechanisms such as the shuttle bus are inadequate. Council therefore requests that a detailed construction worker parking management scheme be included as a Condition of Approval and that this scheme should include:
 - incentives for use of public/active transport, and penalties for driving to work ;
 - provision of lockers for tradesmen's tools;
 - subsidised public transport travel;
 - carpooling incentives;
 - funding of resident parking schemes if appropriate (including both the study and implementation of such schemes);
 - a comprehensive work-based travel plan
 - as well as the proposed provision of shuttle buses.

Additionally, this scheme should be extended to contract workers, as well as direct employees.

In developing this scheme particular attention should be given to adjacent residential areas and businesses along Robert Street and Mullens Street. It should also be noted that the Rozelle Railyards Park is likely to open during the MetroWest construction and that this park is likely to become a significant regional attractor.

- Reopening vehicular access out of Robert Street is not supported by Council due to traffic and safety concerns. Consequently, Council requests at all construction access be via James Craig Road.

Cumulative Impacts

Noting that the Bays Station construction period runs from 2025 to 2028, Council requests that the cumulative assessment proposed in the original *Sydney Metro West Environmental Impact Statement – Westmead to The Bays and Sydney CBD (Sydney Metro, 2020a)* not only consider “major projects” (such as the Western Harbour Tunnel) but that it also include consideration of the numerous projects of lesser magnitude (such as individual elements of the Bays Precinct Redevelopment, active transport network enhancements and upgrades to individual facilities like the cruise terminal).

SUBMISSION POINTS

- Council considers that, by breaking the MetroWest project into a series of smaller sections each having its own EIS, the overall impacts of the project are not being adequately assessed. It is consequently requested that a multi-staged cumulative impact assessment be conducted with:
 - all elements of the Metro West project being assessed, as one;
 - The impacts of the MetroWest project being assessed with all other construction projects in the vicinity.

In addition to the normal assessment of cumulative traffic impacts, Council requests that the comprehensive cumulative assessment should also include consideration of:

- Cumulative construction fatigue;
 - Public health impacts including both physiological and psychological;
 - Management and coordination of respite periods;
 - Overall social impacts;
 - Air and water quality;
 - Groundwater, hydrology and flooding;
 - Noise and vibration;
 - Sustainability and bio-diversity;
 - Waste management;
 - General environmental and amenity aspects.
- Particular attention, in both the individual project-based and multi-project cumulative impact assessment, should be given to the detailing of days (and nights) in which multiple activities from multiple projects will occur.

Flooding and Hydrology

Critically the site is within the Sydney Harbour catchment and on the downstream side of White’s Creek. The EIS recognises that the local environment is highly urbanised and suggests that flooding can be expected to be *largely controlled by the capacity of stormwater drainage systems and roadways that form the overland flow paths.*

It is important to note that the site may be subject to changing drainage patterns, including overland flow, associated with construction of the Rozelle interchange, Rozelle Railyards Park and the naturalisation of White’s Creek. These changes may occur both during construction of WestConnex and subsequent to its completion.

SUBMISSION POINTS

- That particular attention should be paid to potential changes in drainage and overland flow during the construction period of WestConnex (including the Rozelle Railyards Park).
- Coordination and management of drainage associated with construction activities should include consideration of Rozelle Interchange, Rozelle Railyards Park, the Western Harbour Tunnel and the Metro West Bays Station.
- It is also requested that ongoing liaison with appropriate Council Officers be maintained throughout the planning and construction periods.

Heritage and archaeology

Aboriginal heritage

The EIS recognises the potential heritage significance of the construction site adjacent to the proposed Bays Station, in relation to both aboriginal heritage and non-aboriginal heritage. It also proposes established methodologies to approach this issue, however, in recognition of the significance of this location Council wishes to highlight the following.

SUBMISSION POINTS

- While documentation on aboriginal sites and artefacts in the vicinity is limited, anecdotal advice from the local indigenous Community indicates that the area is particularly significant and should be dealt with sensitively and in accordance with all necessary protocols.
- Council considers that issues of Aboriginal Heritage are continually oversimplified and requests that attention be paid to the following:
 - great care should be taken with all excavation, regardless of the depth (noting that there is potential for artefact finds in the top 1m in this area) and that all appropriate archaeological protocols should be adhered to throughout the project's construction phase. This is particularly relevant as the EIS tends to highlight known sites; however Council's experience is that sites are likely to be distributed throughout the White Bay area;
 - it is also requested that comprehensive Aboriginal consultation should always take place when a project is located near any existing, or past, waterway in the Inner West, as these waterways were the "life blood" of Sydney's Indigenous People and are highly likely to include sensitive sites and yield artefacts;

Non-Aboriginal heritage

Council supports the listed protocols associated with non-aboriginal heritage in the area noting that, in contrast to aboriginal heritage, much of the post-contact settlement pattern is well known.

SUBMISSION POINTS

In relation to the protocols Council requests that Metro particularly note the significance of:

- The working port; including its maritime, military, servicing/tendering and container activities (noting that White Bay was the first port in New South Wales to handle containerised shipping).
- The historic nature of rail infrastructure leading to, and adjacent to, the port and power station (including the significance of its direct link by the Metropolitan Goods Line, for container traffic to Chullora Railyards).

- White Bay Power Station, including adjacent works, as well as the power station itself.
- The numerous wharf structures associated with the port and Glebe Island Bridge.
- In addition to the normal heritage controls and protocols relating to conservation, itemisation and preservation, Council emphasises the need to ensure that the construction does not impact, in any way, on the numerous heritage structures in the vicinity (including White Bay Power Station, Glebe Island Bridge and the Silos). Council consequently requests that vibration monitoring stations be established on or immediately adjacent to any significant heritage structures and that regular dilapidation analysis be carried out during the tunnelling and construction period to ensure that any cracking or disfigurement is detected immediately.

Impacts on nearby businesses

SUBMISSION POINTS

- In relation to items listed for consideration as potential business impacts; it is requested that special attention be paid to impacts on the Cruise Passenger Terminal, particularly noting the recent upgrading of its conference/function centre.
- Specific attention should be given to the potential business impacts relating to the increased proportion of residence who will be working from home during the construction period, particularly noting the disruptive influence of construction noise and vibration, potential for power outages and utility interruptions. Additionally, increased traffic congestion may impact on home-office deliveries.
- Particular attention should be paid to managing activities and events associated with festive periods such as New Year's Eve and Australia Day, as this area is used as a celebration viewing area and for associated special events.

Public Health

SUBMISSION POINT

- In recognition of the public health impacts of noise, vibration, dust, illumination and general lifestyle disruption, Council requests that a public health analysis be carried out and that this analysis include consideration of both the MetroWest project and the cumulative impact of the many state infrastructure projects currently underway in the Balmain-Rozelle-White Bay area.

Public Transport

The construction of the Metro West line, particularly in combination with other construction activity in the vicinity of Rozelle/White Bay, can be anticipated to increase congestion on the adjacent road network and in so doing is likely to impact on the reliability of bus services in the area. In order to minimise the inconvenience experienced by the travelling public the following suggestions are made

SUBMISSION POINTS

- Additional bus priority measures should be installed on Victoria Road, including B-signals.
- Any temporary relocation of bus stops should be notified a minimum of two weeks in advance to permit the travelling public to adjust their travel behaviour.

- Consideration should be given to either adjusting bus schedules, to recognise the increased delays resulting from likely increased congestion, or introduction of higher frequency, turn-up-and-go services along Victoria Road.
- Special consideration should be given improving reliability of the 442 bus service, which uses Mullins and Robert Streets, due to the likelihood of increase congestion and queuing at the Roberts Street /Victoria Road intersection.
- In considering the impacts of MetroWest civil construction activity on public transport it should also be noted that during the early stages of construction the Inner West Light Rail Line is likely to be inoperative. As part of the transport management response to the light rail decommissioning a new ferry service will be operating between Blackwater Bay and Barangaroo. Consequently, it is suggested that opportunities be explored to capitalise on access to this ferry service as part of the public transport response to surface road delays likely to occur as a result of MetroWest civil construction activity. Further, specific consideration should be given to opportunities to encourage Metro West construction workers to use this ferry service.

Additional considerations

SUBMISSION POINTS

Council requests that:

- Environmental issues associated with White Bay and contamination in the vicinity of White Bay Power Station are carefully managed.
- The State Government should include Council's direct involvement in the coordination of construction activity and construction traffic in the vicinity of The Bays Precinct and Rozelle Interchange.
- Noting that this EIS refers specifically to civil construction activities, and consequently only has limited build form impacts, Council continues to request that attention is given to the build environment around the Bays Precinct Station in terms of ensuring height, density and housing diversity aligns to Council's stated positions on this issue, including the requirement for 30% affordable housing.
- A comprehensive Community Engagement Process should be adhered to throughout the planning and construction phase of the project, and this engagement process should be transparent and adaptive in a manner which permits it to rapidly responding to changing circumstances.
- Council requests that all of the concerns expressed in this submission are satisfactorily addressed prior to commencement of the proposed works and that both Council and the Community continue to be consulted throughout the Metro West project.

Council looks forward to working closely with the Department and Metro West in achieving the best possible outcomes for the local Community and travelling public.

Should you have any questions regarding points raised in this correspondence please contact Council's Team Lead Strategic Transport Planning, Ken Welsh, via either ken.welsh@innerwest.nsw.gov.au or 02-9392 5731.

Your sincerely

A handwritten signature in black ink, appearing to read 'Manod Wickramasinghe', with a long, sweeping horizontal stroke extending to the right.

Manod Wickramasinghe

Traffic and Transport Planning Manager