



29 April 2022

Transport Assessments
Department of Planning, Industry and Environment
PO Box K659 Haymarket NSW 1240

Re. Sydney Metro West – Rail Infrastructure, Stations, Precincts and Operations Environmental Impact Statement

Thank you for the opportunity to provide feedback on the *Sydney Metro West - Rail Infrastructure, Stations, Precincts and Operations Environmental Impact Statement* (EIS). Council acknowledges that this is the third in a series of EISs and that the EIS currently on exhibition is limited to Rail Infrastructure, Stations, Precincts and Operations.

Council looks forward to active involvement in the various, more detailed, plans that will follow, including:

- Construction Traffic Management Plan (including construction worker parking management);
- Station Designs and Precinct Plans;
- Landscape and Urban Design Plans;
- Active Transport Plans .

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 also considers Metro West 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.

Council considers that the *Sydney Metro West* Rail Infrastructure, Stations, Precincts and Operations EIS has adequately addressed many of the issues listed in the Secretary’s Environmental Assessment Requirements (SEARs).

In this submission, Council focuses its attention on the Bays Station and Bays Precinct, particularly in relation to:

- Accessibility:

- Active transport;
- Air quality;
- Biodiversity and Ecology;
- Community Consultation;
- Construction activity (including, traffic, parking, noise and vibration);
- Cumulative Impacts (including coordination with adjacent projects);
- Flood Management and Stormwater Design;
- Heritage and archaeology;
- Operational Traffic and Transport;
- Public Domain and Station Design;
- Public Health;
- Public Transport.

The submission points raised are either concerns or items requiring more detailed attention. For ease of understanding the following submission highlights its key issues under a *Submission Points* sub-heading in each of the following sections.

General

While it is recognised that current practice is for details of construction management to be subject to further design development and construction planning, Council considers 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 POINTS

- 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).

Accessibility

While it is recognised that more detailed plans will be presented and that Metro West will be required to ensure comprehensive DDA compliance of all facilities the following concerns are raised for consideration now and in the future.

SUBMISSION POINTS

- Accessible Adult Change Facilities should be incorporated into the future buildings for both the construction and operational phases, providing change facilities for future passengers and employees, as well as construction workers.
- A high level of attention should be provided to ensure suitable wayfinding and other access applications for a station of such size. Due to the unique design and circumstances of the Bays Station it will be essential that a site-specific wayfinding and access plan be prepared for the Bays Station and surrounds, rather than a standardised approach used at other stations. As an element of this wayfinding and access design careful consideration should be given to the currently proposed heavy reliance on glass and reflective surfaces which, combined with other traffic and pedestrian arrangements, may unnecessarily complicate effective and safe wayfinding.
- Concern is expressed that there is a high level of reliance on shared areas including approaches to the station. In relation to accessibility it is often challenging to get such spaces to function reliably and efficiently when large numbers of people converge from multiple directions (or exiting the station). Consequently, Council requests that the detailed design for access to the station include comprehensive consideration of all aspects of the accessibility. As such it is essential that the detailed design work for the station and precinct plan embrace leading practice and sensible accessibility, exploring opportunities beyond a strict DDA compliance assessment. The design should enhance the user experience through a full understanding and application of universal design principles to create a welcoming, equitable, safe and efficient space for all users.

Active Transport (walking and riding) – construction phase

While it is recognised that active transport will primarily be catered for once the Bays Station becomes operational it is also essential that it be safely accommodated during the construction phase of the project. To this end the following requests are made.

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 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 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” consequently it is essential that construction vehicle drivers and road cyclists be made aware of potential conflict on these streets;
- All existing pedestrian and bicycle routes around the construction sites should be maintained throughout construction.

Active Transport - operational

It is generally considered that the MetroWest project, particularly planned improvements around the Bays Station, will significantly enhance walking and riding in the area. In order to achieve the most beneficial active transport environment around the station, a series of measures are suggested as submission points, below.

SUBMISSION POINTS

- The EIS includes a clear hierarchy of movement functions that favours pedestrians ahead of vehicles, however concern is expressed that, as no detailed designs are currently available, the final outcome may not clearly reflect the desired hierarchy of users and movement functions. To this end it is essential that:
 - pedestrians and cyclist be prioritised;
 - spaces where pedestrians and cyclists share with motor vehicles should not be included in the design;
 - public transport should be accommodated ahead of private vehicles;
 - where possible cyclists and pedestrians should be physically separated.
- The proponent should provide traffic signals at the existing intersection at Mullens and Robert, incorporating both a pedestrian and cycle crossing .
- The use of 3 escalators to access the platform may prove a deterrent for some passengers, so it is essential to ensure the safest, fastest and most attractive access for both pedestrians and cyclists. To achieve this all traffic signals in the vicinity (existing and future) should include the following and be developed in conjunction with TfNSW’s Network and Safety team:
 - Pedestrian crossings on all approaches/legs of all signalised intersections;
 - Automatic green walk time (ie. no ‘beg button’) and generous green walk times;
 - Lead Pedestrian Intervals (LPI) and short signal cycles to provide frequent phasing;
 - Cycle lanterns if on or near cycle routes.
- The New Precinct Street needs to be legibly designed for slow driving speeds, providing a strong emphasis that it’s a *walking street*. Priority should be provided for pedestrians and cyclist throughout the precinct, most particularly adjacent to the station

- Conflicts between pedestrians and cyclists, such as at station entries and retail areas, need to include sophisticated design outcomes instead of prohibitive restrictions and signage such as “cyclists dismount”.
- The “through site link for connection to buses to be provided” shown in Figure 13-1 should be a walking/bike link only (not accessible by motor vehicles);
- Weather-protected and secure bike parking should be provided adjacent to the station entry needs to be provided;
- To support genuine social amenity and placemaking benefits, the public space in front of the station (as well as other all public spaces) should provide seating with tables (ie. not just benches) because this allows people to stop and eat or use laptops etc, thus increasing the liveability of the spaces. This would also support local retail tenancies;
- The project should include provision for an all-weather active transport link between the proposed Bays Station and the Inner West Light Rail.
- In accordance with current active transport planning for the Bays West, it is essential that Glebe Island Bridge be reinstated as an integrated element of the area’s walking and riding network.
- Where signalised pedestrian crossings are proposed they should be demand responsive favouring pedestrians over vehicle movements.
- Consideration should be given to the introduction of a one-way street pattern around the base station provided that speed and safety issues can be resolved.

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.

Further, the EIS indicates that the Community, Registered Aboriginal parties, Design Advisory Panel, Department of Planning and Environment and Inner West Council will be consulted throughout the design and construction process.

SUBMISSION POINTS

- Council requests that it be actively involved in the overall coordination of both the Metro West project and the numerous other state and private projects currently underway within the Bays Precinct. Further it is proposed that DPIE also be involved in these meetings, as appropriate.

In addition to overall coordination, such consultation should be used to:

- Identify opportunities to support the development of the broader precinct in line with the Bays West Place Strategy.
- Comment on the integration of the *Bays West Place Strategy* and associated *Urban Design Framework* and relevant sub-precinct master plans throughout different stages of construction/planning.
- Provide ongoing feedback on:

- Road layout and interchange facilities;
 - Land use;
 - Detailed built form;
 - Transport enhancements (public and active);
 - Landscape design.
- Ensure a coordinated approach to construction which guarantees local residents and businesses significant periods of complete respite.
- 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.

Construction Activity

The EIS indicates that construction activity will include construction vehicle movements to the site via James Craig Road and Solomons Way/Port Access Road. Additional and/or new access arrangements will propose a right-in and left out to Robert Street. While this EIS does not include civil construction elements addressed in the previous EIS, Council considers that some of these elements have not yet being fully addressed. Consequently some elements considered in the submission points below continued to reflect Council's concern regarding the overall construction activity associated with the Bays Station site.

Specifically, Council considers that access for businesses on the northern side of Robert Street during construction has not been adequately addressed. It is essential that employees and visitors to these premises have safe means of movement for entering/exiting the properties.

Additionally, while the peak hours specified for construction activity are between 7:15-8:15am and 5-6pm, and Robert Street will be used as a secondary point of access to the site; Council expresses concern that any construction vehicle movements on Robert Street have potential to impact residential, visitor, and business access to properties and public transport north of the site.

SUBMISSION POINTS

- EIS must recognise the current, and likely future, *Work from Home* regime, and reconcile construction activity to ensure that impacts on residents working from home are minimised. Consequently, it is considered the number of daytime business hours and daytime out of hours noise exceedances (shown on Table 13.13) excessive and should be reduced as much as possible.
- It is essential that consultation be carried out with local businesses north of the site, to ensure that construction impacts do not significantly inhibit the operation of these businesses.
- The EIS should clearly state:
 - the number of parking spaces to be lost, their location and any compensatory parking to be provided.

- details should be provided regarding management of the following bus stops to ensure safety of bus passengers and prevention of conflict with construction vehicles:
 - Robert Street before Victoria Road;
 - Robert Street at Crescent St.
- A pedestrian and cyclist management plan should be produced to ensure safety and minimise conflict at all crossing facilities, particularly those near bus stops. This plan should also include details of measures to ensure safety of construction workers walking and riding to the area.
- Residents and businesses should be provided with a minimum of two weeks' notice prior to commencement of any changes to advertised construction activity, most particularly in relation to:
 - noise exceedance events;
 - general noise and vibration impact;
 - peak periods of noise and vibration impact.
- Council does not consider that any sleep disturbance events are acceptable.
- 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 occurring around White Bay and Rozelle Bay.
- Council requests that ongoing discussions continue with relevant Council officers particularly in relation to construction impacts on the Community, 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 (as outlined in the previous EIS) and summarised 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.*

Council supports the main access to the construction site being via James Craig Road and Solomons Way/Port Access Road, however concern is raised over the increase in traffic congestion resulting from construction vehicle movements on Robert St (35 second average delay per vehicle in AM peak, and 20 second average delay per vehicle in PM peak). It is considered that this has potential to impact local businesses, visitors, and residents north of the site through increased travel times, delayed or hindered access to workplaces or servicing areas, and efficiency of deliveries.

Based on the projected increase of 292 heavy vehicle movements and 300 light vehicle movements per day, Council is concerned that pedestrian safety north of the site may be jeopardised.

While the EIS states that an additional construction traffic management plan and framework will be prepared Council wishes to raise the following issues in advance of this plan.

Additionally, Council expresses concern that no details are currently provided regarding the management of construction worker parking. This is particularly relevant with the EIS outlining that the proposed road network changes on Robert Street east of Mullens Street will reduce parking spaces from 124 to around 52. Council anticipates reviewing the parking management plan.

SUBMISSION POINTS

- Improved pedestrian facilities should be provided along Robert Street and Port Access Road to ensure pedestrian safety and ease of access to properties north of the site and to avoid pedestrian and construction vehicle conflict.
- Consideration should be given to the use of barricades or other protective measures to ensure the separation of pedestrian and cyclists from construction vehicles.
- Council supports no parking in the New Precinct Street
- Council is concerned that the removal of parking spaces on Roberts St will increase parking demand on Mullens St, Crescent St and Buchanan St (and possibly local streets further afield). This will require the need for compensatory parking spaces to assist local businesses.
- Reduced parking availability should be matched by increased frequencies of public transport services to meet the needs of access for local businesses, visitors, residents, and construction workers. Consequently, Council requests that improved public transport to the site be provided.
- 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 the proposed Construction Traffic Management Framework includes:
 - 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.
- Council requests that a detailed plan be provided showing where and how many parking spaces will be temporarily and permanently removed.

- It is requested that a work-based travel plan be provided addressing access, parking management and measures to reduce private car dependency amongst the construction workforce.
- 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.

- While the previous EIS suggested that construction worker parking management (such as a shuttle bus) will be provided, it is considered that insufficient details are currently 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.

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.

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

Construction Noise & Vibration

The EIS recognises that local businesses and residents will endure noise impacts and there will be at least eleven *highly affected residential receivers* during daytime works. While there are a relatively small number of predicted sleep disturbance events it is considered that any sleep disturbance for residents who have been, and likely to continue to be, exposed two long term construction activity is unacceptable.

In relation to construction noise the EIS indicates that the following noise exceedance events can be anticipated:

- 14 events related to road work activities during peak periods in standard daytime hours will exceed >20 dB.
- 32 events related to road work activities during peak periods in daytime out of hours will exceed >20 dB.
- 9 events related rail systems access shaft work during peak periods (exceeding 10 dB).

SUBMISSION POINTS

- Council considers that no sleep disturbance impacts to residents north of the site are acceptable
- Heavy vehicle movements should be reorganised to ensure:
 - No sleep disturbance for residence;
 - Only minimal night-time impacts to residents.
- No road work activity should exceed >20 dB.
- All affected residential receivers should receive at least two weeks' notice of:
 - The times of day to expect forecasted high noise levels;
 - Severe noise impact time periods.
- Noise and Vibration Monitoring Stations should be established during the construction period for both residential and business properties. Specifically in relation to vibration monitoring heritage buildings should be included. All monitoring results should be made publicly available in real time. Several vibration monitoring stations also should be made permanent to identify vibrations of train movements.
- To provide residents a relief from impacts any activity which may result in unacceptable vibration impacts should not be carried out during sleep hours or at night-time.
- 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.

Cumulative Construction Impacts

While the EIS endeavours to assess the cumulative impact of the many major projects concurrently occurring in the Rozelle/White Bay/Glebe Island area, it is important to note that the Bays Station construction period (2024-2028) will coincide with many existing and potential new, less predictable projects. With this in mind it is essential that a systematic approach to dealing with cumulative construction impacts should be established. This is particularly relevant because of the protracted exposure to construction that local residents have had since the commencement of construction of the WestConnex project, over 6 years ago.

When considering the combined impacts of all of the projects in this area, local residents are likely to have been subjected to continuous extensive construction activity for over a decade by the time Metro West construction concludes,

In order to minimise existing and likely future impacts it is essential that all developers, government and private, be required to work together to coordinate activity to ensure that distinct respite periods are available where local residents are not subjected to any construction activity.

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, for 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. This is particularly important in the case of evening and nighttime noise generation where individual projects will exceed acceptable levels. If coordination is not achieved the possibility exists of multiple noise level exceedances occurring on consecutive nights because individual projects have not condensed exceedance events to simultaneous dates.
 - It is additionally requested that the State Government coordinate all construction activity, private and State, to ensure that distinct, regular and well notified respite periods are provided to residents where no nighttime construction activity occurs.

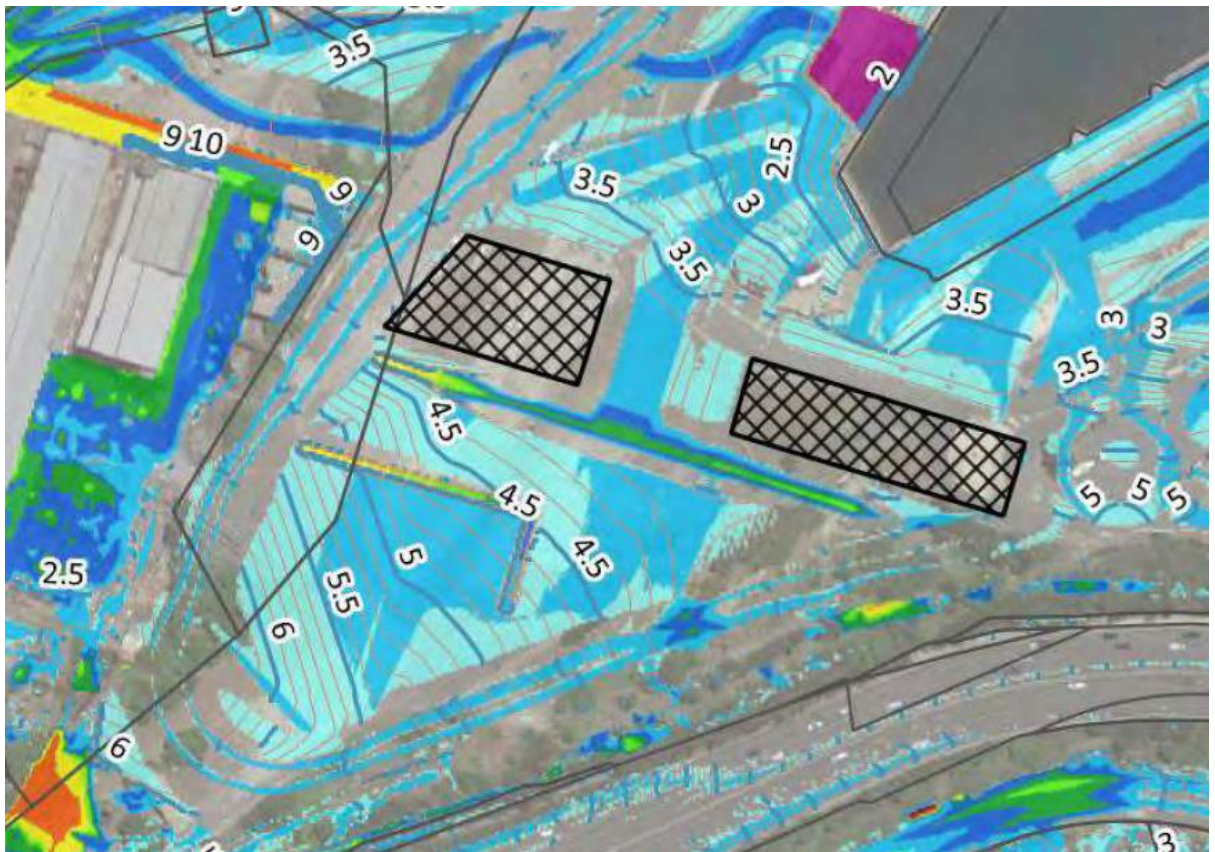
Flood management and stormwater design

Council considers that it is essential for an ongoing dialogue to be maintained regarding flood management and stormwater design and raises the following issues in advance of that dialogue.

SUBMISSION POINTS

- The proposal uses a reduced freeboard of 0.3m, but does not provide adequate justification for this reduction, noting that the Probable Maximum Flood has a significant increase in flood depth. Inner West Council has only supported a reduction in the freeboard from 500mm to 300mm where the depth of flow is 300mm or less and where the overland flow rate is less than 2 cum/sec, with adequate flow paths being available.

- The flood maps show long sections of deep flooding; however the report does not clearly identify how these results are achieved. Reliance on external bunding and perimeter drainage is not considered sufficient to address long term flooding, particularly in areas identified for potential future development south of the station.
- The proposed additional open channel through the site is supported in principle by Council, however specific details of this channel have not been provided within the EIS. Council assumes Sydney Metro will consult further with Council and Sydney Water about the size and design of this structure. Note that Council's Leichhardt Flood Risk Management Plan (available from Flooding - Inner West Council (nsw.gov.au)) proposed an additional 2100x1800 culvert within the Metro site.
- Consideration should be given to designing and constructing the proposed open channel as a naturalised channel to improve local amenity and reduce risk from entry without requiring the channel to be fenced off.
- Council seeks to know who would take on long term responsibility for the maintenance of the new open channel. Would this become a Sydney Water asset, associated with the existing pipeline or a separate asset to be managed by Sydney Metro. Council would not take on ownership of an end of line asset where the existing network was under the ownership and maintenance of Sydney Water.



- Road Design & Management - Council notes that the proposed boundary road would further realign the existing realignment. Council assumes Sydney Metro will consult further with Council about the design of this road and the associated drainage.

Additionally, Council seeks clarification regarding whether this road be handed over to Council as part of the precinct development or remain the responsibility of TfNSW.

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 West 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, with specific consideration being given to the unearthing of the brick ramparts of 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, 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

Noting that the Bays Station site is immediately to the south of the Roberts Street business precinct it is considered essential that impacts on these businesses should be minimised and that the businesses be extensively consulted regarding any impacts that may occur.

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 residents 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.
- Additionally, a more detailed analysis of access and loading limitations likely to be imposed on Robert Street businesses, on occasions that Robert Street may be used of construction traffic, should be carried out;
- 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.

Operational Traffic

Council strongly supports the inclusion of a metro station within the northern LGA and is keen to ensure that active and public transport access to the station be prioritised, however noting that there are many existing residents and businesses in proximity of the proposed station it also recognises that it is important to ensure access to these premises..

SUBMISSION POINTS

Proposed signalised intersection of Robert Street and New precinct street

- Parking needs and vehicular access to businesses along Robert Street should be carefully addressed, noting that a range of businesses operate in this area and as they are based on older factory units, where no or very limited on-site parking is available. On-street parking is already very limited and must cater for a wide range of parking needs. It is considered that the impact of reducing parking from 124 spaces to 52 spaces will be detrimental for nearby businesses. Consequently it is considered that this loss of kerbside parking is unacceptable and must either be significantly improved or compensatory parking provided.
- The proposed traffic signals should include on-street bicycle facilities and pedestrian crossing legs on all approaches.

Intersection of Robert Street and Mullens Street

- There is a need to signalise the intersection of Mullens Street and Robert Street, to accommodate the expected traffic flows. The existing dedicated right turn lane, from Robert Street northbound to Robert Street eastbound, will also need to be lengthened. While carrying out this work the opportunity should be taken to realign and reconfigure the intersection, taking into consideration likely bus, taxi and private vehicles movements from Victoria Road to the Bays Station pickup locations. Additionally, the operation of the White Bay Cruise Terminal will generate movements through and to the end of Robert Street.
- The existing kerb and gutter should be realigned along the south side of Robert Street to provide a continuation of a wider shared path from Victoria Road.
- The signalisation should include pedestrian and cycle crossing legs on all approaches at this intersection.

Robert Street

- Currently, there is no footpath along the south side of Robert Street and, in response to the anticipated high pedestrian and cycle volumes, it will be essential to upgrade all existing (and provide new where not existing) footpaths and lighting.
- Smooth connection to existing and future active paths through the Rozelle Rail yard Parklands and to Victoria Road is essential.
- Connecting bicycle paths to the east along Buchanan Street is also required as these roads are identified as existing cycle routes.
- The footpath along the north side is currently substandard with angle parking and at times vehicle overhang into the footpath areas. These areas should be reviewed to ensure a balance between walking, vehicle loading and on-street parking for businesses.
- It is also essential to improve substandard road and footpath lighting at night.
- In response to the anticipated high levels of pedestrian and cycle activity, mixing with public and private transport, consideration should be given to reducing the speed limit on Robert Street 40 km/hr or even 30 km/hr

Intersection of Robert Street and Victoria Road

- The current shared path width along the White Bay Power Station frontage creates a bottleneck for bicycle riders from Anzac Bridge and Council express the safety concerns regarding the 90m of exposed section east of Robert Street where there is no separation between riders and four oncoming lanes of traffic in Victoria Road. It is requested that the shared path be widened, or ideally, as separated cycleway be constructed.
- The continued poor intersection level of service for Robert Street at Victoria Road traffic signals is a concern for Balmain Peninsula residents experiencing delays entering and exiting Victoria Road during the AM and PM peak hours. The part-time operation of the right turn

phase from Robert Street to Victoria Road should be re-examined as part of the traffic signal upgrade, and any opportunities to improve intersection performance should be considered.

- With the anticipated increase in pedestrian end cycle use to the station it is considered essential that a bicycle lantern be provided across Robert Street and that the existing, sub-standard, pedestrian crossing leg be repositioned further away from the Victoria Road carriageway.

Bays Station, New Precinct Street & internal roads

- The proposed roundabout within New Precinct Street should be built in a way that provides a turnaround area, without the need to access James Craig Road.
- The Absence of restrictions imposed for vehicles connecting to James Craig Road, from New Precinct Street is likely to result in an undesirable *rat run* with safety and amenity consequences particularly for businesses along James Craig Road.
- Council requests that the proposed bicycle parking in the Metro Station be provided with superior end-of-trip facilities, lockable and secure facilities to encourage active travel.

General operational conditions

Council requests that the future planning for the site include:

- Traffic calming measures such as speed humps and lane narrowing;
- High frequency buses at new bus stops;
- Increased bus services at new bus stops;
- Enhanced pedestrian and cycle safety measures;
- Examination of reduce speed limits.

Public Domain and Station Design

It is noted that the current EIS builds on work undertaken and presented previously in the Bays West Planning Strategy previous EISs.

Whilst the proposal impacts on a large area due to spatial requirements for the construction activity, it is generally confined to a number of specific elements including the Bays Station building and associated Public Domain, the proposed Traction Substation and associated Public Domain, and the New Precinct Street.

The public domain planning appears to firstly focus on the merits of people arriving at the site and being able to access the foreshore area of White Bay with less focus on the connections to the adjoining suburbs of Rozelle and Balmain.

Additionally, concern is expressed that the design of the station building and precinct as a whole has been carried out in isolation and is not cognisant of the *Bays West Place Strategy*, most particularly its *Bay West Urban Design Framework*.

SUBMISSION POINTS

- The height of the metro station buildings and traction substation will impact on views from Anzac Bridge accessway. The visual assessment (Technical Paper 6, p218) states that the

metro station buildings will be 7-8 storeys in height, with the traction buildings rising to 5-6 storeys, ensuring loss of views of the Harbour Bridge.

Further, the height of the station building as identified in chapter 13 of the EIS (7-8 storeys) is likely to exceed the maximum RL as specified in the Bays West Urban Design Framework (2021) – RL22.2. Noting that RL22.2 as defined by the White Bay Power Station CMP and viewsheds it is considered that the current form of the station and traction substation buildings is inappropriate and should be redesigned, in consultation with Council and the Community.

- The proposals do not address connectivity to areas beyond the actual site area. This includes a lack of analysis or commitment to access to existing established areas of Rozelle, Balmain and Balmain East. Given the likely impact of a major metro station in this area it is essential that a more detailed review of access and the adequacy of active transport links to the site from the local area, particularly Victoria Road and Mullens Street, be carried out.
- Connections from the Rozelle Parklands to the White Bay area are circuitous and will not encourage optimised use or attract new users.
- Connections from Victoria Road to the White Bay area are appropriately indirect for vehicles, however more direct connections for active transport do not appear to have been provided. Consideration should be given to the opportunity for Victoria Road, following completion of the Iron Cove Link tunnel, to become a significantly more important active transport link for local residents and cyclists traveling from further afield.
- The function of the proposed public domain adjacent to the proposed Traction Substation should be clarified.
- While there is merit in locating the Traction Substation adjacent to the White Bay Power Station, to minimise its visual and amenity impact on other parts of the site, it potentially forms a barrier to direct active transport links from the Rozelle Parklands (that are identified in the Structure Plan of Bays West). Consideration should be given to analysing these impacts and providing a balanced approach.
- Principles included in Appendix E (Design Guideline, of the EIS, specify the following:
 - *Enhance legibility and accessibility through the Bays Precinct by facilitating connections to White Bay Power Station, Anzac Bridge and White Bay.* - is considered that this principle is inward looking given the stations proximity to well established communities. The proposal should aim to maximise legibility and accessibility beyond the boundaries of Bays West and maximise access for their primary customer base which is acknowledged as largely pedestrians from nearby communities.
 - *Ensure key view corridors frame the new precinct* - A number of iconic views exist to and through the area from existing corridors and communities. The Metro station and any associated over station development should retain these views as detailed in the *Bay West Urban Design Framework* that accompanies the *Bays West Place Strategy*. The Chapter 13 of the EIS has assessed these impacts and particularly notes views of White Bay Power Station heritage item will be directly and permanently impacted. The mitigation measures largely rely on heritage design guidance, however this is unlikely to overcome the proposed building height and building envelope (albeit limited information has been provided).

Consequently it is requested that these buildings, and the overall layout of the station precinct be redesigned, in consultation with Council and the Community, with a view to

more accurately complying with the requirements of the *Bay West Urban Design Framework*.

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.

Additional considerations

SUBMISSION POINTS

Council requests that:

- Environmental issues associated with White Bay and contamination in the vicinity of White Bay Power Station must be carefully managed and a real time, publicly available response mechanism should be created.
- 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.
- 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 stylized flourish at the end.

Manod Wickramasinghe

Traffic and Transport Planning Manager