

**SYDNEY METRO BLUES POINT ACCESS SITE – SSI 7400 Mod 8**

I object to the proposed modification on the following grounds:

- Adverse impacts on visual and social amenity.
- Significant increase in heavy vehicle movements, particularly outside standard construction hours.
- Lack of documentation regarding assessment of alternatives.
- Limited engagement with the local community.

However, if approval is to be given, I request application of specific conditions listed later.

**Key provisions in existing conditions of approval for SSI 7400****Construction hours**

1. Standard construction hours in the current conditions of approval are 7am to 6pm Mondays to Fridays and 8am to 1pm on Saturdays, with no work on Sundays and public holidays. (E36)
2. Activities that may be undertaken 24 hours per day, 7 days per week, are subject to the Out of Hours Work Protocol in Condition E47. (E48)
3. An Out of Hours Work Protocol must be prepared for work outside of standard construction hours. The protocol must include:
  - a risk assessment in which the Acoustics Adviser reviews all proposed out-of-hours activities and identifies their environmental risk levels, and
  - a process for the endorsement of out of hours activities by the Acoustic Adviser. (E47)
4. The Proponent must use best endeavours to schedule annoying activities at the Blues Point temporary site between 7am and 8pm. (E48.1)

**Traffic**

5. Construction Traffic Management Plans must be prepared for each construction site and submitted to the RMS before construction commences at the relevant construction site. (E82)
6. The Proponent must schedule final track laying as soon as practicable following completion of tunnelling with a view to transporting materials and equipment for station fit-out, systems and commissioning by rail to minimise truck movements in town centres. (E84)
7. Heavy vehicle haulage must not use local roads unless no feasible alternatives are available. (E85)
8. A Road Dilapidation Report must be prepared for local roads proposed to be used for heavy vehicles. If damage occurs as a result of construction, the Proponent must either compensate the landowner or rectify the damage to restore the road to at least the prior condition. (E90/91)

### Community Information and Reporting

9. A Community Communication Strategy must be prepared to facilitate communication between the Proponent and the community during design and construction. The strategy must set out procedures and mechanisms for the regular distribution of accessible information. (B2)
10. The project's Overarching Community Communication Strategy allocates the responsibility for engaging with the local community during the design, planning approval and early work/low impact activity stages to the Sydney Metro Project Communications team. (s7.2.2)
11. The strategy must also provide for the formation of issue or location-based community forums that focus on key environmental management issues of concern to the relevant community. (B2)
12. The project's Overarching Community Communication Strategy allocates the responsibility for formation of these forums to the contractor delivery communication teams. (s8.30)
13. A Complaints Management System must be implemented and maintained for the duration of the works. (B6)
14. The project's Overarching Community Communication Strategy allocates the responsibility for managing complaints to the Sydney Metro Project Communications team. (s8.15)

### Proposed modification

15. The applicant's modification report proposes using the Blues Point temporary site as the primary access point to fit out the rail tunnels between Victoria Cross and Barangaroo, including continued use of the existing acoustic shed for an additional 12 months.
16. Surface construction activities would include concrete deliveries and unloading of trucks with heavy items (e.g. concrete rail sleepers).
17. Concrete deliveries would occur during standard construction hours. However, in the event a concrete pour is required to be finalised, concrete truck movements may continue, to ensure the concrete pour is completed.
18. Out of hours work is expected to consist of delivery of materials into the site, with a small logistics crew working in the acoustic shed to unload deliveries.
19. The proposed modification has been developed in order to complete the under-harbour tunnel fit-out works more efficiently.

**Objection**

20. The Blues Point temporary site is in a highly residential area, with the nearest business approximately 300m away, and no through traffic. This differentiates the site from nearly all of the other Sydney Metro construction sites. The site is in between two harbour foreshore parks, one of which contains a children’s playground.
21. The local community has raised many concerns about the proposed modification. These include adverse social and visual amenity impacts, an increase in construction hours and heavy vehicle movements, safety concerns, assessment of alternatives and community trust/engagement. I support all of these concerns, and will focus on a few of them.

**Significant increase in heavy vehicle movements**

22. In the May 2016 Environmental Impact Statement (EIS) for the project, Figure 8-26 in the Main Volume and Figure 3.24 in Technical Paper 1: Traffic and Transport forecast the following heavy vehicle arrivals during the excavation period (12 months with standard construction hours) and during each tunnel boring machine (TBM) component retrieval phase (4 weeks each with extended hours).
23. This table sets out the resulting daily movements.

*Heavy vehicle forecasts – EIS during excavation period and TBM retrieval phases*

Time	Excavation period (12 months)			TBM retrieval phases (4 weeks x4)		
	Weekdays	Saturdays	Sun/PH	Weekdays	Saturdays	Sun/PH
7am – 8am	4	-	-	2	2	2
8am – 9am	4	4	-	2	2	2
9am – 10am	4	4	-	2	2	2
10am – 11am	6	6	-	4	4	4
11am – 12pm	6	6	-	4	4	4
12pm – 1pm	6	6	-	4	4	4
1pm – 2pm	6	-	-	4	4	4
2pm – 3pm	6	-	-	4	4	4
3pm – 4pm	4	-	-	2	2	2
4pm – 5pm	4	-	-	2	2	2
5pm – 6pm	4	-	-	2	2	2
6pm – 7pm	-	-	-	-	-	-
7pm – 7am	-	-	-	12	12	12
Arrivals	54	26	-	44	44	44
Departures	54	26	-	44	44	44
Movements	108	52	-	88	88	88

24. After the project was approved, the number of trucks was significantly reduced due to barging of spoil and removal of the tunnel boring machine components. The Construction Traffic Management Plan for the Blues Point temporary site does not appear to be available online. Table 7-2 (in Section 5.1.1) of the modification report summarises the hourly numbers.

25. Section 5.1.2 of the modification report sets out the heavy vehicle numbers proposed during the extended access period. It does not specify proposed numbers on Saturdays, Sundays or public holidays. Although Section 4 of the modification report says that concrete deliveries would predominantly occur during standard construction hours, it also says that activities associated with tunnel fit-out works are approved to be undertaken 24 hours per day, 7 days a week.
26. Enquiries to the project team about the proposed level of weekend movements received answers that:
- It is anticipated that Sunday truck movements would be less than the 4 truck movements per hour in the weekday peak hours.
  - Sundays are unlikely to have the peak truck movements outlined in the modification report.
27. In the absence of a clear indication of proposed weekend heavy vehicle numbers, I have applied the volumes set out in Section 5.1.2 of the modification report to all 7 days of the week.
28. This table compares the heavy vehicle arrivals in the CTMP during the 12-month excavation period with those proposed for the modification.

*Heavy vehicle forecasts – CTMP during the excavation period and proposed*

Time	CTMP (12 months)			Modification report (12 months)		
	Weekdays	Saturdays	Sun/PH	Weekdays	Saturdays	Sun/PH
7am – 8am	2	-	-	4	4	4
8am – 9am	2	2	-	4	4	4
9am – 10am	2	2	-	4	4	4
10am – 11am	4	4	-	6	6	6
11am – 12pm	4	4	-	6	6	6
12pm – 1pm	4	4	-	6	6	6
1pm – 2pm	4	-	-	6	6	6
2pm – 3pm	4	-	-	6	6	6
3pm – 4pm	4?	-	-	6	6	6
4pm – 5pm	2	-	-	4	4	4
5pm – 6pm	2	-	-	4	4	4
6pm – 7am	-	-	-	8	8	8
Arrivals	34	16	-	64	64	64
Departures	34	16	-	64	64	64
Movements	68	32	-	128	128	128

29. The conclusions to be drawn from the two tables are that:
- The proposed number of weekday heavy vehicle movements (128) would be a significant increase from those during the excavation period (a 19% increase from the 108 in the EIS, and an 88% increase from the 68 in the CTMP).
  - If Saturday, Sunday and public holiday heavy vehicle movements equal those on weekdays (128), that would be a large increase from those during each retrieval phase (a 45% increase from the 88 in the EIS, and presumably an even larger increase from the CTMP).
  - Out of hours heavy vehicle movements (after 6pm and on weekends) are proposed for 12 months. This would be significantly longer than the aggregate duration of the tunnel boring machine component retrievals (4 months with breaks in between).

30. The NSW Interim Construction Noise Guideline notes that:
- Residents are usually most annoyed by work at night time, as it has the potential to disturb sleep.
  - Sleep disturbance is affected by the frequency of high noise events and maximum noise levels.
  - Noise from work on evenings, Saturday afternoons, Sundays and public holidays can also be annoying to residents as it may interrupt leisure activities.
  - People are usually annoyed more by noise from longer-term works than by the same type of works occurring only for a few days.
31. The proposed timing and frequency of out of hours heavy vehicle movements needs to be clarified as part of the assessment process. It is important that appropriate limits are applied, so that residents would be able to enjoy adequate sleep during the 12-month extension.

#### Safety concerns

32. Blues Point Road is a fairly narrow, 2-lane winding road that passes through a community village containing roadside cafes and an uncontrolled pedestrian crossing. The road is relatively steep as it approaches the site and there are several intersections with limited sighting distances. The local community is concerned about speeding and truck noise in this area.
33. Given the proposed increase in heavy vehicle movements and expanded operating hours, it is imperative that any approval contains a condition regarding increased driver training.
34. Traffic control at the site has not been good. The traffic controllers are more interested in helping the trucks out than in protecting pedestrians. Expandable barriers are not used, as they are at most construction sites.
35. Given the proposed increase in heavy vehicle movements and expanded operating hours, it is imperative that any approval contains a condition to enhance pedestrian safety near the site.

#### Documentation regarding assessment of alternatives

36. The modification report states (in s2.2.1) that the Blues Point temporary site is the only viable option to complete tunnel fit-out works between Victoria Cross and Barangaroo to ensure the overall construction timeframe of the project is maintained. (my emphasis)
37. The modification report also states (in s4) that the proposed modification is to provide access to complete the under-harbour tunnel fit-out works more efficiently. (my emphasis)
38. While both of these statements may be true, no expert report, opinion or independent review has been provided or referenced in the modification report to verify these statements.

Limited engagement with the local community

39. The project’s Overarching Community Communication Strategy allocates (in s7.2.2) the responsibility for engaging with the local community during the design, planning approval and early work/low impact activity stages to the Sydney Metro Project Communications Team.

40. Community engagement regarding the extended access proposal appears to have been as follows:

Date	Event	Comment
9 June 2020	Letterbox drop	To residents (but not owners) within 200m
9 June 2020	Project update	Distributed as above
9 June 2020	Project update	Emailed to Blues Point distribution list
16 June 2020	Interactive session 1	12 registered attendees
20 June 2020	Interactive session 2	10 registered attendees
various	Responses to email enquiries	
22 July 2020	DPIE advertisement	Advising public exhibition
22 July 2020	Project update	Emailed to Blues Point distribution list
30 July 2020	DPIE advertisement in local paper	
various	Responses to email enquiries	

41. Other Sydney Metro emails sent to the Blues Point distribution list during this period have been:

Date	Event	Comment
12 June 2020	Weekly site update	Did not arrive
19 June 2020	Weekly site update	No mention of extended access proposal
22 June 2020	Notification re gantry crane	No mention of extended access proposal
26 June 2020	Reminder of above	No mention of extended access proposal
1 July 2020	July site update	No mention of extended access proposal
10 July 2020	Update on gantry crane	No mention of extended access proposal
31 July 2020	August site update	No mention of extended access proposal

42. Key points arising from the above are:

- Owners of adjacent properties do not appear to have been directly advised of the proposal.
- Residents, owners and businesses along Blues Point Road do not appear to have been letterboxed about the proposal.
- Less than 20 people took part in the interactive sessions (many people attended both), which were arranged with limited notice and spread of dates.
- Other site updates from Sydney Metro (authored by the tunnelling contractor) did not mention the extended access proposal.

43. With around 1500 households in McMahons Point, the level of engagement with the community has been extremely low, even allowing for the effects of COVID-19. This makes it even more important to ensure that the Complaints Management System would adequately respond to community complaints.

**Conclusion**

I object to the proposed modification for the reasons discussed above.

However, if approval is to be given, I request application of the following conditions:

- (a) No concrete deliveries after 1pm on Saturdays and no concrete deliveries on Sundays and public holidays. It may be that no deliveries are intended, but including this condition would provide certainty for the local residential community.
- (b) Concrete pours to commence no less than 1 hour before end of standard construction hours. This will minimise the risk of concrete truck movements outside standard construction hours and help protect the amenity of the local residential community.
- (c) No truck deliveries after 8pm and closure of the acoustic shed doors at 8pm. This aligns with Condition E48.1. It allows a period of late afternoon/early evening deliveries, followed by ongoing preparations in the acoustic shed. It provides residents with an appropriate respite period and an opportunity for adequate sleep.
- (d) The provision of site-specific driver training covering local pedestrian movements, speed management, noise mitigation and idling/parking along Blues Point Road and surrounding streets. This will help improve pedestrian safety and help protect local amenity.
- (e) A temporary pedestrian walkway along the western side of Blues Point Road opposite the site, along with ongoing safety audits. This will help pedestrian and vehicle safety.
- (f) Maximum noise levels (RBL + 5 dB or not audible) at the boundary of nearby residences outside standard construction hours. This will help protect resident amenity at night and on weekends.
- (g) An updated Road Dilapidation Report. This will enable appropriate compensation/restoration for the additional heavy vehicle movements.