

**SUBMISSION FROM INNER WEST COUNCIL
TO THE DEPARTMENT OF PLANNING INFRASTRUCTURE AND ENVIRONMENT
ON THE SYDNEY METRO WEST ENVIRONMENTAL IMPACT STATEMENT
(CONCEPT & STAGE 1)**

22 JUNE 2020

Contents

1.	INTRODUCTION	2
2.	OVERVIEW OF SUBMISSION	3
3.	CONSIDERATION OF SYDNEY METRO WEST CONCEPT.....	5
3.1	Service and Alignment.....	7
3.2	Metro’s Plans to Support Housing and Employment	9
3.3	Blue/Green Grid	9
3.4	Alignment with Council’s Strategic Planning Policies and Initiatives	10
3.5	Integration with Strategic Opportunities across Metropolitan Sydney	11
3.6	Connections to Camperdown Innovation Precinct and Green Square	12
3.7	Integration with Inner West Light Rail Line.....	13
3.8	Expanding the Existing Transport Connections to Bays Precinct	13
3.9	Station Design Principles	13
3.10	Built Form and Urban Design	14
3.11	Active Transport	15
3.12	Place-making	16
3.13	Environmental Performance and Sustainability.....	16
3.14	Scenic Quality, Visual and Heritage impacts	17
3.15	Public Access to Foreshore.....	18
3.16	Existing and Proposed Land Use Context	19
3.17	Governance and Ongoing Participation	21
3.18	Proposed Mid-Station Ventilation/Service Facility	21
4.	CONSIDERATION OF SYDNEY METRO WEST STAGE ONE	23
4.1	Cumulative Traffic Impacts.....	24
4.2	Construction Hours and Associated Noise/Vibration.....	24
4.3	Air Quality.....	27
4.4	Construction Traffic.....	27
4.5	Proposed Alternative Construction Routes 1 and 2	28
4.6	Construction Worker Parking	30
4.7	Cumulative Construction Impacts	30
4.8	Aboriginal Heritage.....	31
4.9	Non-Aboriginal Heritage.....	32
4.10	Biodiversity	32
4.11	Miscellaneous/Additional Consideration	33

1. INTRODUCTION

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 upgrade to Sydney’s network, however Council continues to seek a change to the existing “hub and spoke transport network”, with greater north-south and node-node connectivity.

Council also strongly 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. The Metro West Concept and Stage I Environmental Impact Statement (EIS) provides strong design objectives with a foundation for place-making and improving liveability. Its use of the NSW Government’s Architect *Better Placed* objectives is considered highly valuable in developing suitable outcomes for Sydney.

It is acknowledged that the EIS currently on exhibition is limited to the project’s Concept and Stage -1 construction works. Council recognises that Metro West will subsequently provide station designs and precinct plans for consultation with Council, and the Community.

Notwithstanding this, Council emphasises the importance of integration of the proposed stations with the existing local character of adjacent areas.

It is considered imperative that proposed station developments are cohesive in design and respond positively to the surrounding public domain, public open space and waterfront. Further, it is essential that the station developments minimise negative impacts on the surrounding residential and business communities. Recognising the opportunities presented by Metro West, these developments should embrace sustainable building methods and operational measures. In the case of The Bays Station it should particularly seek to improve the marine and terrestrial biodiversity of The Bays Precinct.

This project presents an extraordinary opportunity to create a thriving world-class Bays Precinct which would serve not only Inner West residents, but visitors and businesses from across the State, Nation and Globe.

Council welcomes the opportunity to engage with Metro West in delivering this precinct and ensuring that any current and future planning of the precinct, including the station design, location, access and alignment, supports the achievement of the mutually beneficial outcomes.

In relation to the proposed mid-station ventilation/service facility (between Five Dock and The Bays Stations) it is requested that comprehensive on-going consultation be conducted with both Council and the Community prior to any location being decided on.

2. OVERVIEW OF SUBMISSION

Council considers that the proposed Sydney Metro West should be viewed as a future component of Sydney's overall integrated transport network. As such it is considered that limiting the EIS's consideration to a section between The Bays and Westmead does not do justice to the magnitude and significance of the project. It is considered that the concept of running from the CBD to Westmead, and ultimately with Western Sydney International "Nancy-Bird Walton" Airport (WSA), has the potential to significantly reshape Greater Sydney in a positive manner. Consequently, in assessing this EIS Council's submission includes consideration of some "bigger picture" aspects of the ultimate project (CBD to WSA).

Additionally, the EIS addresses the "Concept" level with the inclusion of Stage 1, and while it may be advantageous to the proponent to approach the development approval with a staged and piecemeal approach, this approach means approval is likely to be granted with many elements of the proposal still undefined and unclear. Consequently, this submission contains many references to Council's concerns about limited information being provided in the EIS, which means full consideration of impacts is not possible. The EIS should have a sufficient level of detail which allows full assessment by key stakeholders (like Council) to be undertaken but this is not the case.

There is also no guarantee that additional changes to the EIS will automatically trigger full community and stakeholder consultation as modifications to the EIS. Very significant local elements to this proposal, such as the location of the ventilation/exhaust stack in the Lilyfield/Rozelle/Leichhardt area will be required but are not included in this EIS. Items such as these must be fully consulted with the Community and Council, and be subject to an EIS modification proposal.

It is also considered regrettable that the community consultation for this EIS, due to the Coronavirus Pandemic, has been conducted almost exclusively online (with no face to face consultation) and a distribution of letter-dropped material limited to the areas immediately adjacent to the proposed transport corridor rather than conducting a wider distribution which would also have included areas beyond the corridor, which are nevertheless still impacted by the proposal. It is considered that more steps should have taken to address the limited means of consultation made available to the Community (due to the pandemic) including more extensive letter-drops and an extension on the consultation period by at least an additional 2 week period.

SUBMISSION POINTS:

In examining the more comprehensive project (Sydney CBD to WSA) Council requests that additional consideration be given to the development of a station between The Bays and Five Dock. Inner West Council also supports the City of Sydney's proposal for a station in Pymont.

In suggesting a "Leichhardt Station" Council notes that provision of an additional station between The Bays and Five Dock would:

- increase the passenger catchment of Metro West;
- negate the need for a ventilation facility between The Bays and Five Dock Stations; and
- potentially enhance connectivity with the Inner West Light Rail and Inner West Bus Network.

It is considered that, by limiting the EIS to Concept and Stage 1 only, it contains insufficient detail, of the overall project to, permit a truly comprehensive and informed assessment by key stakeholders.

Council also requests a commitment, from Sydney Metro and DPIE, that any changes to the project (as discussed in the EIS) will automatically trigger full community and stakeholder consultation; as formal modifications to the EIS.

Additionally, Council expresses concern that by limiting the scope of this EIS to the Concept and Stage 1 the construction traffic assessment provided in the EIS does not include a full analysis of the impact at the Bays Station site, as it excludes the likely use of the site for removal of tunnel spoil for Stage 3 of the project (tunnelling from The Bays Station to the CBD).

Consequently, Council requests that additional detail be provided regarding the total spoil to be removed at The Bays Station site total duration that this site will operate as a construction and spoil removal location, as well as the total construction traffic associated with the site.

Council also requests that all future EIS's, REFs, Modifications and the like, be the subject of much broader letterbox drops (to include all areas affected by the project, not merely nearby properties) and longer notification periods.

Of specific concern to Council is the absence of a clear understanding of the proposed site for the ventilation/services facility (between Five Dock and The Bays Stations). Due to this lack of clarity, Council requests that this facility be the subject of a separate EIS or, at the very least, a formal modification which is separately exhibited and consulted on.

To ensure that Sydney Metro West achieves the fullest potential of its patronage Council requests that consideration be given to the development of a light rail service from the Lilyfield Light Rail Station to the eastern end of the Bays Precinct and that a good interchange be created between Light Rail and the Metro West service.

This submission has also been prepared based on Sydney Metro's commitment that consultation will continue for future EIS's which will include:

- Stage 2 – All stations (including above ground building design, precinct planning, access plans, as well as urban design and landscape plans), depots and rail systems between Westmead and The Bays;
- Stage 3 – All major civil construction works including station excavation, tunnels, stations, depots and rail systems between The Bays and the Sydney CBD Station, and operation of the line.

It is recognised that the current EIS proposes controls and mitigation measures in relation to issues including

- Noise and vibration;
- Traffic and transport;
- Soils and contamination;
- Biodiversity;
- Hydrology
- Heritage; and
- Air quality.

In relation to the above, it is generally considered that these aspects have been addressed within the current NSW State legislative framework and Sydney Metro's various strategies/plans (eg Construction Environmental Management Plan). It is also noted that numerous strategies/plans are yet to be prepared (eg Station Access Plans, Construction Traffic Management Plan). Consequently, this submission has been prepared as an initial statement on Council's position including the highlighting of a number of specific concerns Council wishes to ensure are addressed in greater detail, in both the State's consideration of EIS submissions and the project's future strategies.

SUBMISSION POINT:

It should also be noted that, Council continues to express concern regarding the location of the mid-station ventilation/service facility proposed between The Bays and Five Dock stations. As this has not been defined in the current EIS Council is unable to adequately assess the impact of this facility. Consequently, Council requests that once a location chosen (in consultation with Council and the Community) either a separate EIS or formal modification of the current EIS should be issued.

3. CONSIDERATION OF SYDNEY METRO WEST CONCEPT

The Concept as identified in the EIS, and summarised below, is generally supported by Inner West Council, particularly noting the significant improvements to Sydney's public transport network that it will assist in achieving.

The key features of the Sydney Metro West Concept identified in the EIS are:

- About 24 kilometres of twin tunnels between Westmead and the Sydney CBD;
- New metro stations at Westmead, Parramatta, Sydney Olympic Park, North Strathfield, Burwood North, Five Dock, The Bays and Sydney CBD. The location of the Sydney CBD station will be determined following further investigations and Community and stakeholder engagement. Strategic station locations at Rydalmere and Pymont are also under investigation;
- A turn-up-and-go metro service operating early morning to late at night, between Westmead and Sydney CBD;
- Pedestrian links and connections to other modes of transport (such as the existing suburban rail network and other parts of the metro network) and surrounding land uses;
- Modifications to existing suburban stations and associated rail infrastructure (such as overhead wiring, signalling, access tracks/paths and rail corridor fencing) at Westmead and North Strathfield;
- Services within each of the metro stations, including mechanical and fresh air ventilation equipment and electrical power substations to supply power for operation;
- A stabling and maintenance facility at Clyde, including associated aboveground and belowground tracks to connect to the mainline tunnels and other operational ancillary infrastructure;
- Services facilities at Rosehill (within the Clyde stabling and maintenance facility construction site), Silverwater and between Five Dock and The Bays Precinct for fresh air ventilation and emergency evacuation (*Noting Council's existing concerns regarding the provision of the ventilation/service facility between Five Dock and The Bays Precinct*);
- Alterations to pedestrian and traffic arrangements, and cycling and public transport (e.g. bus) infrastructure around the new stations;
- Subdivision of station sites to support integrated station and precinct development and ancillary facilities;
- Ancillary facilities to support construction.

Council also recognises that the following items will be addressed as part of future staged approvals:

- Future staging of construction of the Concept (i.e. beyond Stage 1);
- The preferred location of the metro station in the Sydney CBD;
- The potential inclusion of strategic station options at Rydalmere and Pymont;
- Station design, access, fit-out, finishes and treatments;
- Place-making and the integration of stations into the surrounding environment;
- Tunnel and tunnel rail systems fit-out works;
- Track form (and associated operational noise and vibration characteristics);
- Permanent adjustments/alterations to the transport network to facilitate transport interchange;
- Long-term groundwater treatment;

- Tunnel alignment (horizontal and vertical) between The Bays and the Sydney CBD;
- The extent of residual land following construction of the Concept;
- Provisions within the station design to allow for integrated station development.

3.1 Service and Alignment

Provision of a frequent high-speed, high-capacity Metro service between the CBD, Parramatta and (ultimately) Western Sydney Airport is strongly supported by Inner West Council. The proposed Metro West is considered to represent a genuine city shaping opportunity and it is agreed that Metro West provides an opportunity to optimise the bus network, however Council suggests that the advent of Metro West should provide much more than simply an optimisation of the bus network, rather it should be considered to provide the impetus for a comprehensive review of Sydney's public and active transport networks, with a view to providing safer, simpler, more user-friendly connectivity between all modes.

As Sydney progresses through the 21st century it is essential that private car dependency is significantly reduced and Metro West, in combination with other sustainable transport initiatives, has the potential to achieve this.

Council strongly supports the State Government's vision of improving public and active transport throughout the Sydney Region, and considers that Metro West project (while a very significant addition to Sydney's transport infrastructure) must be treated as only one new element of improvements to Sydney's overall integrated transport network.

SUBMISSION POINTS:

Consequently, Council is keen to see how the State Government will further enhance the Inner City's existing transport network in a manner which will capitalise on the creation of this new system by steps including, but not limited to:

- ensuring that Metro West is an integral component (rather than a stand-alone element) of a revised transport network which includes enhancements to and seamless integration of all travel modes in a manner which will accommodate existing and likely future travel needs;
- providing improved linkages between Metro West and existing rail lines (both heavy and light rail);
- providing improved linkages between Metro West and existing (and future) bus services
- providing improved linkages between Metro West and existing (and future) ferry services;
- improving north-south public (and active) transport connectivity across Inner Sydney;
- improving public and active transport along both the Parramatta Road and Victoria Road Corridors, as well as linking these corridors to the Metro West Line;

- providing a link between The Bays Station (and/or a future Pyrmont Station) and the Camperdown Collaboration Precinct;
- inclusion of a bus/metro/ferry interchange facility as an integral aspect of The Bays Station;
- safe, legible, direct, all-weather interchange - between modes.

Additionally, it is considered that the absence of a station in the Inner West LGA (Leichhardt, Rozelle or Lilyfield) unnecessarily impairs access for many of the Sydney's Inner West Community. It is considered unclear whether the primary reason for an absence of a station in the Inner West is the desire for a 20 minute journey time between the CBD and Parramatta, depth limitations placed on the project by the construction of the WestConnex Rozelle Interchange, or a combination of both.

Should the 20 minute travel time be the reason Council requests that this be re-considered and that it be the subject of a comprehensive travel behaviour study.

Should the logic behind the absence of a station in the Inner West LGA be the depth of the Metro tunnel alignment (currently dictated by the depth of the WestConnex tunnels) Council requests that detailed consideration be given to a revision of the route alignment and deeper than normal station in the Inner West. In requesting this Council notes that deep dive stations are becoming increasingly common with recent examples in Kiev, St Petersburg, Moscow, Chongqing and Pyongyang. It should also be considered that a revised alignment which could:

- permit the Metro tunnel to be at a lesser depth;
- provide improved interface/interchange with the surface public transport and active transport networks;
- avoid the need for a ventilation/service facility in a very sensitive area (eg Leichhardt Park Aquatic Centre or Callan Park);

In response to the above Council requests that the State Government:

- examine, in detail, opportunities to provide an additional station between Five Dock and The Bays Stations;
- initiates a comprehensive review of Sydney's public and active transport networks with a view to creating seamless transfer between all modes. Such a review should include, but not be limited to:
 - providing improved connectivity between the Metro West and existing rail lines (both heavy and light rail);
 - improved north-south connectivity across Inner Sydney;
 - improving public and active transport along both the Parramatta Road and Victoria Road Corridors, as well as linking these corridors to the Metro West Line;
 - an additional metro station in Pyrmont;
 - provision of a ferry terminal serving The Bays Station and providing services to North Sydney, Barrangaroo and Circular Quay, with (subject to demand) possible links to the Parramatta River Service;

- enhanced active transport links between each Metro station and nearby residential, retail and employment centres;
- providing a link between The Bays Station (and/or a future Pyrmont Station) and the Camperdown Collaboration Precinct.
- assists Councils in implementing various demand management mechanisms including:
 - accessibility based parking control regimes;
 - bus, bike and pedestrian priority measures;
 - reduced speed limits in residential and shopping streets;
 - widened footpaths and provision of separated cycle lanes,
 - time-based management of service and delivery vehicles;
 - focus on movement of people rather than movement of cars.

Should it not be possible to provide a station between The Bays and Five Dock, significantly enhanced public and active transport links should be provided through the Inner West to both Five Dock and The Bays stations.

3.2 Metro's Plans to Support Housing and Employment

Council's Housing Strategy identifies the Bays Precinct's potential to contribute towards future housing, with an estimate that 10% of the precinct will be used for residential purposes (as indicated by the 2015 Urban Growth Strategy).

Dwelling yield estimates in Council's Housing Strategy for this precinct range from 1504 to 3008. Additionally, Council's Local Strategic Planning Statement (LSPS) indicates that 30% of all new housing should be delivered as social, seniors and affordable housing, including rental housing for key workers (owned by community housing providers).

SUBMISSION POINTS:

Council would welcome any opportunity to work with Metro and DPIE to prepare the rezoning plans for the Bays Precinct consistent with Council's vision to increase housing supply, choice and affordability, as well as Council's vision to increase open space – recreational and passive, community facilities and employment lands.

Council also requests further information from Metro West regarding its objective '*to support additional housing supply and employment growth opportunities and urban renewal initiatives in The Bays Precinct corridor*'.

3.3 Blue/Green Grid

Council aims to expand its *blue/green infrastructure* to enhance ecological and public health benefits across Greater Sydney. While the Blue/Green Grid Strategy is currently being prepared, Council's LSPS has identified an indicative blue/green grid across the Bays Precinct as shown in the map below:



Figure 1 - Indicative blue/green grid along Bays Precinct (Inner West Council LSPS)

SUBMISSION POINT:

Council requests that Metro deliver the blue/green grid for Bays Precinct as part of this project as it aims to enhance ecological and public health benefits across Greater Sydney. This would be consistent with Sydney Metro’s Network-wide objective to *‘improve access to and resilience of the transport network through integrated land use and transport planning, including integration of Sydney Metro West with other transport modes’*.

3.4 Alignment with Council’s Strategic Planning Policies and Initiatives

Council’s LSPS envisions the Bays Precinct as undergoing a major transformation into a port, maritime, employment and recreation space that connects Balmain Peninsula to the Bay, with the inclusion of innovative and diverse housing, and an emphasis on provision of affordable housing and design that celebrates environmental sustainability, local culture and heritage. Making this Precinct part of the emerging innovation corridor with improved links and connectivity to Greater Sydney.

SUBMISSION POINTS:

Consequently, Council requests that Sydney Metro West consider the strategic vision for the Precinct as outlined in Council’s LSPS, Housing Strategy and Draft Employment & Retail Lands Strategy (EaRLS) in planning and designing its interface with the Bays Precinct. To assist Sydney Metro in considering key elements of Council’s strategic vision several specific actions relating to Bays Precinct are provided, as a starting point, below:

LSPS Planning Priority 12 states the following vision for The Bays Precinct:

“The Bays Precinct is a world class example of the transformation from an industrial area to a stunning waterfront, climate positive destination that attracts the jobs of the future and delivers public places, promenades and open space, workplaces and housing to support a healthy and vibrant community.”

Action 13.10 - *“Work with the State Government to ensure that The Bays Precinct redevelopment delivers strong benefits for both the Inner West community and the region and becomes a **low-carbon high performance precinct**. Goals to be progressed collaboratively include:*

- *Maintaining a major focus on employment generating uses with a minimum required non-residential FSR.*
- *Delivering social housing, seniors housing and affordable housing including rental housing for key workers with 30% of all new housing owned by community housing providers.*
- *Ensuring well defined and connected open space linkages to the Balmain Foreshore, Glebe Island and the City of Sydney LGA. This should include shared spaces to support and promote alternative modes of transport including cycling and publicly owned foreshore promenades, parks and a recreation area on the former Rozelle rail yard.*
- *Adaptive reuse of White Bay power station that retains its heritage significance and provides a focal point for the precinct.*
- *Ensuring green infrastructure is embedded in the redevelopment of the Bays Precinct;*
- *Maintain and expand the unique range of land uses and activities currently found within The Bays Precinct, for example historical maritime land uses, the heritage fleet, rowing and dragon boating and acknowledge the existing port activities at Glebe Island.*
- *Minimize the impacts of current / upcoming construction projects on the amenity and function of the surrounding area.”*

Action 13.11 - *“Work with the State Government to provide world class active and public transport links as part of The Bays precincts development including:*

- *Metro West station.*
- *Reopening Glebe Island Bridge for pedestrians and cyclists.*
- *Ferry links and extension of light rail.”*

3.5 Integration with Strategic Opportunities across Metropolitan Sydney

Council supports Metro’s vision which is consistent with the Greater Sydney Commission’s (GSC) objective to ‘contribute towards the vision for a three cities metropolis including the ‘30-minute city’ concept’.

SUBMISSION POINT:

Council considers it essential that Metro's connection between Sydney CBD and Parramatta CBD (and ultimately WSA) does not overlook long-term opportunities that Metro West could unlock along this corridor; and as such requests that a long term, strategic vision be provided for the Corridor.

3.6 Connections to Camperdown Innovation Precinct and Green Square

In 2019 the GSC released the Camperdown-Ultimo Place Strategy to inform public and private policy and investment decisions in the Camperdown-Ultimo Collaboration Area.

The Camperdown-Ultimo Collaboration Area is envisioned to be Australia's innovation and technology capital by 2036. The key priority of this Collaboration Area is to support the area's vitality and economic growth. Camperdown-Ultimo is located within the Eastern Harbour City, with key assets in health, education and research, including the Royal Prince Alfred Hospital, TAFE NSW, University of Notre Dame, University of Sydney and University of Technology Sydney, as well as numerous medical and research institutions.

The Collaboration Precinct's place strategy proposes the following actions for Camperdown:

- Advocate for a Sydney Metro West station (currently access to Camperdown activity node within 30 minutes by public transport is constrained compared to the other activity nodes)
- Establish a biotechnology hub and safeguard innovative, incubator and research activities from unrelated commercial land uses

The Camperdown Alliance is subsequently preparing the Camperdown Land Use and Strategic Employment Study to develop a pathway to establish a biotechnology hub in Camperdown. The draft report identifies that a metro station is vital to the delivery of this biotechnology hub which could be of global significance for its health and education services, if served by appropriate mass-transit connections.

Metro West is presented with an opportunity to assist in creating the 'knowledge arc' in New South Wales which could connect significant economic centres of Bays Precinct Camperdown and Green Square via Sydney CBD.

SUBMISSION POINT:

It is considered that there are major social, economic and environmental opportunities that have not been adequately assessed by the Metro West EIS. Consequently, it is requested that the potential for further economic agglomeration in each of these important strategic centres should be thoroughly assessed and considered in the project alternatives for Metro West, and that serious analysis be carried out examining opportunities for the long-term provision of a future Metro Station in Camperdown-Ultimo Should it not prove viable for the Metro West alignment to service the Collaboration

Precinct it is essential that efficient transit links be provided between Camperdown-Ultimo and The Bays Station as well as a future Pymont Station. It is then requested that Sydney Metro commit to servicing the Collaboration Precinct with a Metro Station on a future Metro line.

3.7 Integration with Inner West Light Rail Line

It is considered that assessment of the project's alternatives does not adequately explore the opportunity to improve access to the areas in Inner West which are currently inadequately served by public transport but are within a potential the overall "corridor catchment" for this project. Metro West also misses a huge opportunity to provide an interchange with light rail stations in the Inner West LGA, which could significantly increase Metro's patronage and improve accessibility for the Inner West residents.

SUBMISSION POINT:

It is requested that Metro reconsider its alignment to avoid sterilising opportunities to expand transport connections for the Inner West Community and beyond, particularly noting the extent and success of the existing Inner West Light Rail. Alternatively, consideration could be given to the provision of a light rail link to the Bays Station, lining Lilyfield (or Rozelle Bay Stations) with The Bays Station, then progressing across Glebe Island Bridge (re-instated for public and active transport only) to the CBD, possibly via Pymont Bridge.

3.8 Expanding the Existing Transport Connections to Bays Precinct

Council supports Metro West's objectives to optimise existing public transport and expand its outreach to existing residents in walking/cycling catchments of its stations. However, concern is expressed that key transport integration opportunities are not being realised. It is considered that the project overlooks the opportunity to create a significant transport interchange at Bays Precinct.

SUBMISSION POINT:

It is consequently requested that Metro investigate opportunities to create a Metro, bus, ferry and active transport interchange at the Bays Station.

3.9 Station Design Principles

Council welcomes the statement made under Section 7.11, of the EIS, that preliminary place and design principles have been prepared for each station location and will be refined with local councils to support the next phase of design.

The establishment of an independent design panel chaired by the NSW Government Architect to review at appropriate stages is also strongly supported.

However, as detailed elsewhere in this submission the proposed preliminary station design and entry location creates concern for Council.

SUBMISSION POINT:

In order to ensure the best possible design outcomes it is considered essential that conditions of approval for the project require the designs to achieve the intent of the design guidelines and establish an independent design review panel which include each relevant Council.

3.10 Built Form and Urban Design

Council supports the provision of a Metro West station in White Bay and recognises its significance to the redevelopment of The Bays Precinct. However, with the Table 6-10 of the EIS defining the station's primary function as "origin and destination" and with the list of station customers not including transferring passengers, Council considers that a significant network integration opportunity is being missed. This is exacerbated by the absence of any reference to provision for a significant Metro/bus/ ferry) interchange, and/or the possibility of a link between the Inner West Light Rail and The Bays Station.

Additionally, The Bays Station (as currently proposed) has only one entry; to the south of White Bay, near the future Bays Waterfront Promenade. This proposed entry is supported in principle as it would provide access to the existing community to the south of the Metro station, however it is considered that such an important station, located in a major growth area should provide significantly more than a single entry.

Given the various access constraints associated with the location of The Bays Station it is considered that this station will rely on public and active transport as a means of extending its passenger catchment. This premise further supports the need for consideration to be given to additional entries to the station, taking into consideration the impact additional entry points could have on constrained traffic and parking in surrounding established residential areas on the Balmain Peninsula.

SUBMISSION POINTS:

In order to provide the greatest patronage it is essential that public and active transport networks link safely, reliably and conveniently to the station. To assist in achieving this it is suggested that the station design should include that:

- an approach which 'Thinks globally and acts locally', create a unique design which is derived from the surrounding context and has an authentic 'local' vibe and then projected nationally and globally;
- consideration be given to additional entries to the station to provide high levels of accessibility and mobility for all users while also ensuring that there is mitigation for the anticipated impact that additional entry points will have on constrained traffic and parking in the surrounding established residential areas on the Balmain Peninsula.

- Significant place-making and public domain improvements providing opportunities to link the station to a redeveloped White Bay Power Station, an enhanced foreshore and the Cruise Passenger Terminal. (Noting the possibility of providing public access and activation of the terminal during non-ship days);
- provision for active transport links to:
 - a reinstated Glebe Island Bridge (reinstated for active and possibly public transport only);
 - a potential future foreshore walk/shared path (including White Bay, Jones Bay and Rozelle Bay);
 - the future Rozelle Railyards Linear Park (and associated active transport network);
 - a future Victoria Road cycleway and enhanced pedestrian paths (to be implemented concurrently with completion of the Iron Cove Link);
 - northwards into the Balmain residential area, Rozelle and Balmain Main Street shopping areas;
 - directly to the Cruise Passenger Terminal for its ship days, event facility and possible long-term public foreshore access;
- opportunities to connect to the Inner West Light Rail, including a possible spur line from either Rozelle Bay or Lilyfield Light Rail Stations;
- opportunities for a significant bus/metro/ferry interchange.

Further, it is considered that the design of the station including access, entries, built form design should be in tandem with the design of the surrounding precinct to ensure that placed based outcomes are prioritised and achieved. It would be a major missed opportunity if station designs progressed without the surrounding precinct plans. Local distinctiveness, derived from the street pattern, services, landscape, climate and socio-cultural idiosyncrasies (among others) should be embedded in the vision for the renewal project in order to create identity and engender community acceptance.

3.11 Active Transport

It is considered that the provision of only one access point to the Bays Station significantly reduces accessibility to the facility and would result in unnecessarily circuitous active transport routes, thus reducing the attractiveness of the site for walkers and riders. Additionally, the provision of only one station entry would funnel all patrons to a single location resulting in high levels of congestion and conflict particularly during peak periods. Not only has this congestion/crowding potential to reduce safety (by increasing conflict between users) it is also likely to result in unnecessary inconvenience and delays for passengers.

This congestion would further be exacerbated by mass disembarkation of bus passengers wishing to transfer to the Metro. Further, the provision of only one station entry is counter to the design principles referred to in Chapter 7 of the EIS, which discusses enhancing legibility and accessibility to all stations.

SUBMISSION POINTS:

In considering the access requirements of the Bays Station Council suggests that the Station Design Principles should be akin to those of Parramatta, rather than the smaller stations as The Bays Station will ultimately serve a significantly increased population (resulting from The Bays Precinct redevelopment) and potentially be a significant transfer point for bus passengers (and other modes if the suggestion of a full interchange is pursued). This transfer opportunity is particularly relevant given the reliable 5-6 minutes travel time by Metro in contrast to the highly variable timing provided by buses between this point and the CBD.

Consequently, Council requests that the Bays Station design should include:

- additional access points/entries designed to maximise attractiveness for both walkers and riders to use the station;
- safe, legible:
 - cycle routes which do not conflict with traffic or pedestrians;
 - pedestrian routes which do not conflict with traffic or cyclists;
 - embarkation and disembarkation areas for public transport passengers;
- user-friendly forecourt areas designed to accommodate transferring passengers and possible community activities.

3.12 Place-making

Metro's Modal Access Hierarchy, as outlined in Chapter 7 of the EIS is strongly supported by Council, however Council's experience with other major projects has been that unless the hierarchy is detailed in the Conditions of Approval some agencies and contractors may prove reticent to applying the hierarchy (eg by relinquishing unnecessary road space to permit wider footpaths or cycle lanes).

SUBMISSION POINTS:

It is requested that the Modal Access Hierarchy (as identified in the EIS) be specifically referred to in the project's Conditions of Approval to ensure that the safety and convenience of walking, cycling and public transport are placed ahead of the needs of private cars.

Further it is requested that, as well as including this Modal Access Hierarchy within the project's place-making considerations it should also be included an element of the overall concept, a critical urban design element and an aspect to inform the design of stations (most particularly the Bays Station).

3.13 Environmental Performance and Sustainability

It is acknowledged that Metro West is still developing its Sustainability Plan; however, Council emphasises the importance of The Bays Station and Bays Precinct being a low carbon high performance precinct (in line with GSC's vision) and requests that it be design and

constructed as a world-class demonstration of sustainability and environmental performance.

Council's vision for the environmental performance of Bays Precinct is discussed in its LSPS actions below:

As directed by the Eastern City District Plan, Council's LSPS designates Bays Precinct as a low carbon precinct. This meaning that it's an area focussed on supporting and delivering:

- Improved building efficiency,
- Building and precinct scale renewable energy,
- Increased public transport and car share use, lower parking on-site parking rates, and conversion (and reuse) of waste.

SUBMISSION POINT:

The Metro West project should be designed to support Council and the GSC's vision as a low carbon high performance precinct. Making the precinct a low carbon one relies on high quality and sustainable building design and siting, which will need to be considered thoroughly as the project progresses. This objective can be achieved through increasing public transport use, sustainability building design, sustainable construction practices and the overall planning & design of the Bays Station and its surrounds.

3.14 Scenic Quality, Visual and Heritage impacts

The limited information provided in the EIS, regarding scenic and visual quality means that it is not possible to fully understand the visual impacts of the proposed station development at this stage. It is recognised that this will be addressed in future stages of the project, however it is essential that early consideration be given to view impacts from surrounding areas is one of the central urban design considerations of the Sydney Regional Environmental Plan No. 26 – City West (SREP 26) and Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005.

The proposed station and precinct design have the potential to contribute to beneficial landscape and amenity impacts, or to negate many years of work in developing and maximising view corridors and scenic attributes of the area. The proposed station development should be sensitively designed, particularly in relation to minimising any view loss to the iconic Sydney Harbor and White Bay Power Station.

Landscape elements and views within The Bays Precinct have been identified to range from regional to local sensitivity in Table 8-26.

SUBMISSION POINTS:

Concern is expressed that the assessed landscape and visual sensitivity levels as the White Bay Power Station are under estimated and should reflect its identification as a heritage item of state significance. The EIS should reflect the significance of these views and any station/precinct design should have a scale and character which would be in keeping with

the surrounding existing built form and not just the future character of the surrounding built form as suggested in table 8-27.

Further, Council does not support acceptance of the visual impacts of the mid-station ventilation/service facility proposed between Five Dock and The Bays Stations, as outlined for “adverse visual impacts” (Table 8 -27). It is acknowledged that the proposed facility would have a function driven scale, however, there is no reason that it cannot be designed sensitively to respond to the surrounding area and potentially have improved visual and landscape impacts through improvement of public domain and additional landscape planting. Metro’s approach to design of the facility with “adverse visual impacts” is considered completely unacceptable

3.15 Public Access to Foreshore

It is considered that the EIS does not clearly demonstrate how the proposed Bays Station will interface with the foreshore. The proposed ‘potential connections’ along the foreshore (as illustrated in Figure 2) are supported.

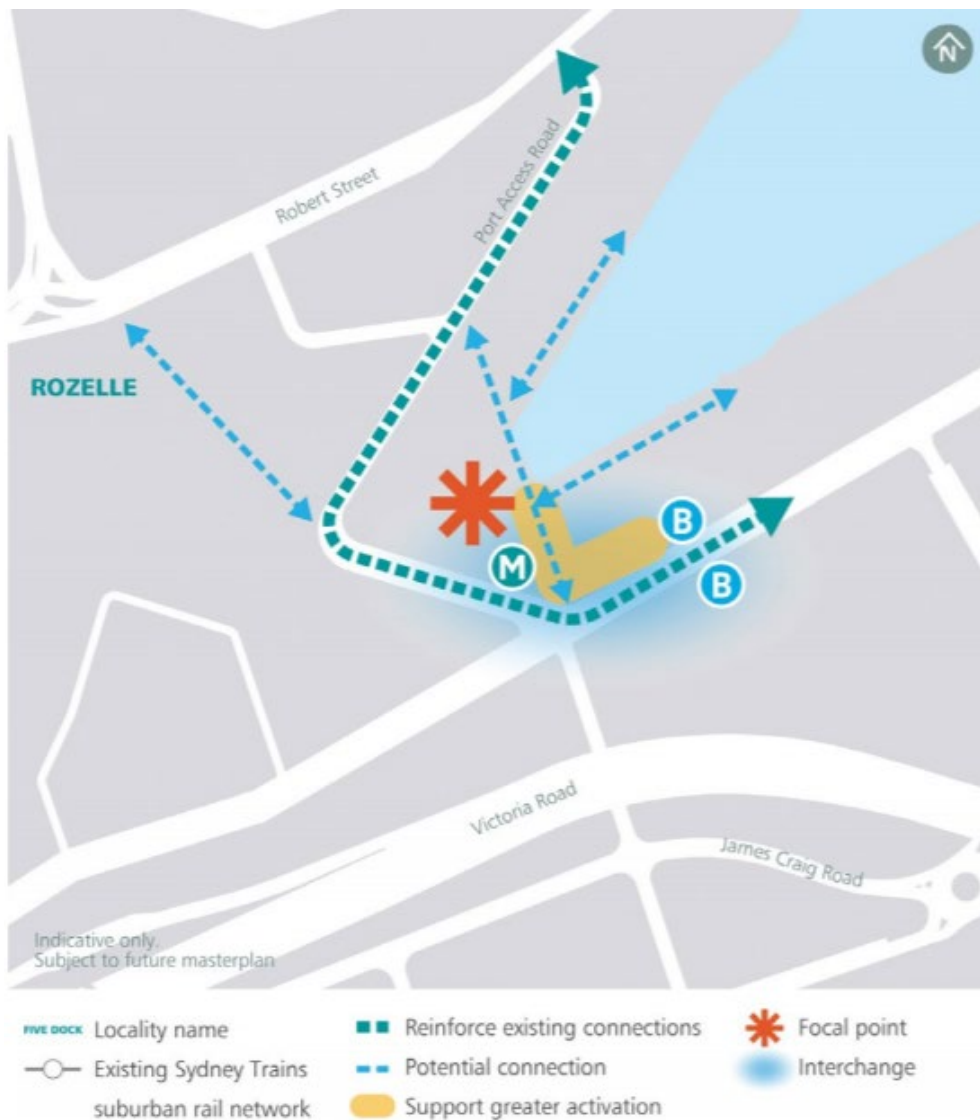


Figure 2 - Proposed foreshore connections (Metro West EIS – Concept & Stage, 1 Figure 7-9)

SUBMISSION POINTS:

To better serve the needs of potential users it is requested that:

- connections to the foreshore be designed to optimise the use of the foreshore for active transport/commuting and recreational activities;
- a generous width of walkway, along the water’s edge, should be provided for public access and its dimensions should be planned in conjunction with Council to ensure it is future-proofed in relation to the ultimate population to be served.

3.16 Existing and Proposed Land Use Context

Figure 14-10 of the EIS (Figure 3) indicates existing land uses around The Bays Station, however this figure is inconsistent with the existing zoning under the Leichhardt Local Environmental Plan 2013 (Figure 4).

Council is extremely concerned about the misinterpretation of land use in the area, with industrial zoned sites fronting Victoria Road, Crescent Street, Parson Street and Robert Street being represented as Residential. This illustrated residential use is not reflective of the existing land uses or Council’s policy context.



Figure 3 – The Bays Station Existing Land Use (Metro West EIS – Concept and Stage 1, Figure 14-10)

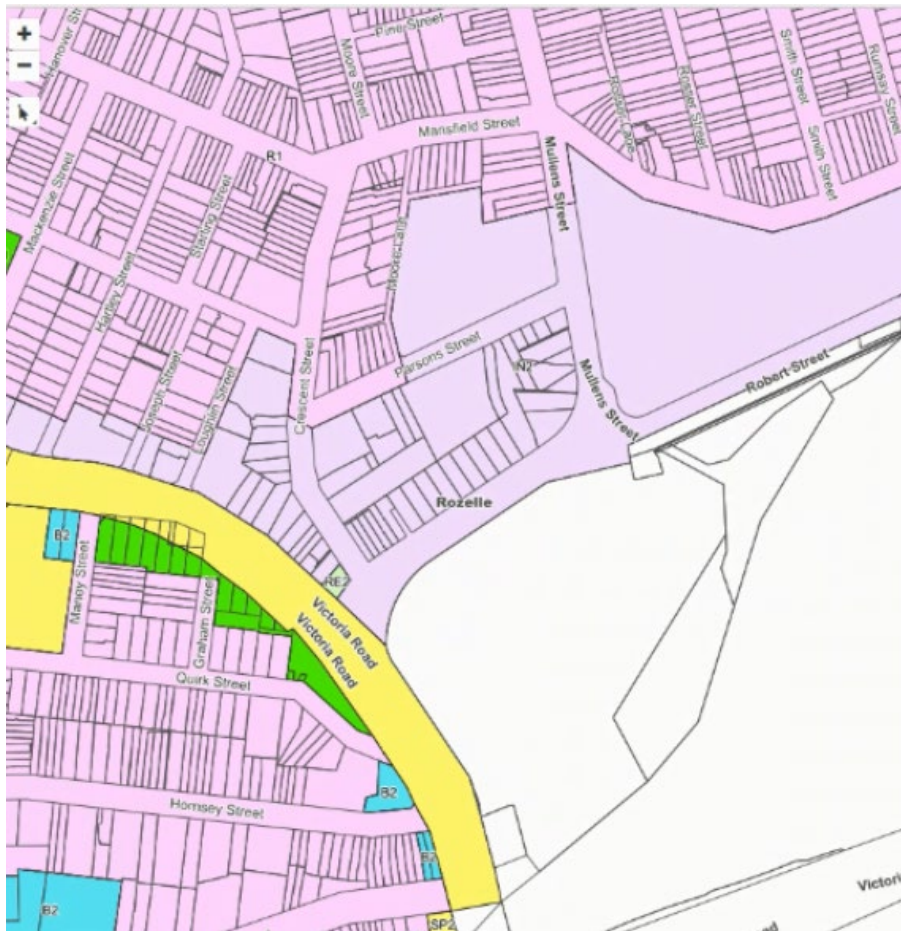


Figure 4 – Industrial zoned land under Leichhardt LEP 2013

Council is currently finalising its Draft Employment and Retail Lands Strategy. This strategy will provide an approach to managing land in a manner which maximises productivity and facilitates job growth in the Inner West. Several key actions under this strategy, relevant to the Bays Precinct, have been included in the *Submission Points* below.

SUBMISSION POINTS:

Council therefore requests that the EIS assessment of existing land uses be revised and that, as well as the existing zoning, Council’s Draft Employment and Retail Lands Strategy be considered in this assessment.

This draft Strategy provides council’s desired future approach for managing land to maximise productivity and facilitate job growth in the Inner West. To assist Metro in better assessing existing and likely future land uses the following actions (from the draft Strategy) are highlighted for consideration:

Action 3.2.3 – ‘Work with the state government to enhance the delivery of employment generating land uses at The Bays Precinct by:

- Encouraging the ongoing and long-term operation of the port to cater to the growing freight demand,
- Lobbying the state government to adopt the ‘agent of change principle’ over land at the port, to require attenuation of surrounding residential.’

Action E.2 – *‘Establish part of Victoria Road, Rozelle as an enterprise corridor to create additional employment opportunity close to The Bays Precinct which is proposed for significant growth.’*

Whilst Council acknowledges that some of these areas are out of Metro’s EIS scope, it is imperative for Metro to consider the existing land uses around the station and Council’s vision to expand economic opportunities close to The Bays Station.

3.17 Governance and Ongoing Participation

A long-term precinct governance arrangement is important to curate a precinct like The Bays and to realise the wider vision for urban renewal in the Inner West. Strong governance arrangements can play a strategic role in revitalising the economy, quality urban design and strong financial outcomes for government.

SUBMISSION POINT:

Council takes this opportunity to recommend that the State Government limit the establishment of separate government management and delivery agencies for The Bays Precinct and that it establish a strong governance framework consisting of Sydney Metro, Department of Planning, Industry and Environment, Ports Authority, Office of Environment and Heritage, Transport for New South Wales, Local Councils and other relevant agencies and industries and community to guide Bays Urban renewal from inception to delivery.

This would allow creation of a transparent planning framework with clear lines of responsibility and coordination, including capacity to determine the scale and form of redevelopment, to deliver and reap the benefits of this large-scale urban renewal project. It also recognises that Local Councils have the experience and knowledge of their local community to add value to this kind of collaborative master-planning process and Inner West Council would welcome any opportunity to engage with Metro in this regard.

3.18 Proposed Mid-Station Ventilation/Service Facility

The project requires a service facility (ventilation, hydraulic air pressure diversion and emergency evacuation) between Five Dock and The Bays Stations. Initially this facility was proposed immediately adjacent to Leichhardt Park Aquatic Centre, and while it is contended (in the EIS) that the ventilation would be solely for fresh air, concern is expressed by both that this may not be the case. In selecting a site for the ventilation/service facility it should be noted that Council is strongly opposed to it having any proximity to Leichhardt Pool; which attracts some 770,000 visitors per year (many of which are children or elderly).

Council agrees with the EIS contention that site selection criteria should include:

- The site would not be located on existing residential land;
- There would be no removal of vegetation that constitutes a locally occurring Plant Community Type;
- There would be no direct impacts on items listed on the State Heritage Register;

- There would be no direct impacts to significant elements of any locally listed heritage items;
- The construction of the facility would not result in any negative impacts to groundwater users, groundwater dependent surface flows or groundwater dependent ecosystems.

SUBMISSION POINTS:

Additionally, Council requests that the site selection criteria should be expanded to also include, “that the site:

- should not raise public concern or be considered inappropriate by local authorities or the local community;
- should not be in close proximity to public/community buildings or areas that attract people to linger for extended periods of time.”

Council contends that should a new station be provided, between Five Dock and The Bays, this would negate the need for a ventilation/service facility as it would permit expulsion of hydraulic air pressure and provision for passenger evacuation. (Noting that these are the two key reasons identified for the proposed ventilation/service facility, resulting from the longer than normal distance between the stations on this part of the alignment.)

Consequently, Council also requests that, should an additional station prove to be unachievable, Sydney Metro should:

- continue to work with Council to examine suitable locations for the proposed ventilation/service facility, noting that Council and the Community consider that any site adjacent to Leichhardt Pool is totally unacceptable;
- provide assurance that only spoil directly associated with the ventilation/services facility will be removed from this location (ie that no tunnel excavation spoil be removed from the site);
- recognise that streets in the vicinity of sites currently under investigation are unsuitable to truck and dog configurations. Consequently it is requested that restrictions be placed on the size of vehicles servicing such a site; with no articulated vehicles to be permitted other than those specifically required for the transport of heavy machinery into and out of the site;
- recognise that such areas are generally unsuitable for construction worker parking. In response to this it is essential that a comprehensive green travel plan be implemented to discourage workers from driving to the site and that all parking subsequently required be accommodated on the site. Further, pre-and post-commencement parking studies should be carried out and should a restricted parking scheme be required (eg resident parking scheme) it is to be implemented at Metro’s expense;
- carry out location-specific traffic, parking, noise/vibration and other conditions to ensure the safety, amenity and integrity of adjacent residents and other users of the area. These conditions should only be finalised once comprehensive engagement of the Community and Council has been completed. Additionally the opportunity should be included for such conditions to be varied should circumstances change.

4. CONSIDERATION OF SYDNEY METRO WEST STAGE ONE

The key features identified in the EIS relating to all major civil construction of Stage I of the Metro West project between Westmead and The Bays:

- Enabling works such as demolition, utility supply to construction sites, utility adjustments and modifications to the existing transport network;
- Tunnel excavation including tunnel support activities;
- Station excavation for new metro stations at Westmead, Parramatta, Sydney Olympic Park, North Strathfield, Burwood North, Five Dock and The Bays;
- Shaft excavation for services facilities at Rosehill (within the Clyde stabling and maintenance facility construction site), a location between Five Dock Station and The Bays Station construction sites (*yet to be determined – and currently opposed by Council*), and Silverwater;
- Civil work for the stabling and maintenance facility at Clyde including earthworks and structures for crossings at A'Becketts Creek and Duck Creek;
- A concrete segment facility for use during construction located at the Clyde stabling and maintenance facility construction site;
- Excavation of a tunnel dive structure and associated tunnels at Rosehill to support a connection between the Clyde stabling and maintenance facility and the mainline metro tunnels.

Council recognises that the following aspects of the construction methodology may be subject to further refinement:

- Specific location of facilities within construction sites (including the design and siting of acoustic sheds or other acoustic measures)
- Alternative haulage routes, construction site access and/or traffic management arrangements at North Strathfield, Burwood North and Five Dock to provide improved traffic safety and reduce potential impacts in these locations
- Spoil transport by barge from The Bays Station construction site for reuse at the Clyde Stabling and maintenance facility construction site or to locations such as Port Kembla or Port of Newcastle for regional re-use opportunities
- Alternative approaches to the construction of the B-double route around the Clyde stabling and maintenance facility construction site, including potential use of an underpass instead of bridging structures to minimise flooding and visual impacts
- Sequence of construction activities
- Temporary road diversions
- Specific location of a services facility to be located between Five Dock and The Bays.

SUBMISSION POINT:

In recognition of the above; Council requests that these elements be subject to ongoing consultation with both Council and the Community.

4.1 Cumulative Traffic Impacts

Sydney's Inner West, particularly in and around White Bay, Balmain, Rozelle and Lilyfield, is currently being subjected to extensive cumulative construction impacts associated with many State government projects, and it is likely that this will continue for over a decade to come. These projects include:

- WestConnex;
- Western Harbour Tunnel;
- Bays Precinct Redevelopment;
- Sydney Metro South-West (noting that one of the projects construction vehicle stabling yards is located in White Bay);
- Glebe Island concrete batching works;
- Glebe Island multi-user facility; and now
- Sydney Metro West.

Each of these projects have both operational and construction impacts on the adjacent area including construction traffic, and each in turn is adding its own incremental loading onto the adjacent road network. However, each development has been addressed individually and its incremental increases addressed as "one-offs (only being assessed on their own individual impacts).

Even though the State Government has established a mechanism for addressing cumulative traffic impacts Council and the local community has not seen any proposed development downscaled to reduce its contribution to the overall cumulative impact on this area.

Council specifically expresses concern that analysis provided in the Metro West EIS states that several adjacent intersections are already at, or near, capacity and yet the EIS indicates that the project will add traffic to these intersections. If the intersections are at capacity, Council questions their ability to accommodate additional traffic without causing some of the existing traffic to divert to other locations, including local streets or streets with sensitive uses.

SUBMISSION POINT:

In order to ensure the safety and amenity of all users of White Bay, Balmain, Rozelle and Lilyfield, Council calls on the State Government to seriously address the issue of cumulative impacts (traffic and other), in and around White Bay. Further, it is requested that the State Government cease to incrementally increase these impacts (one development at a time) by assessing projects individually rather than as an integral piece of the overall area.

4.2 Construction Hours and Associated Noise/Vibration

Council commends Metro West for its commitment to restricted construction hours for surface works as specified below:

- 7am to 6pm Monday to Friday
- 8am to 1pm Saturdays
- No works on Sundays or Public Holidays.

However it is noted that tunnel operations will continue 24/7 and consequently spoil removal, material supply and utility management works are programmed to operate 24/7. Additionally, it is noted that Tables 11-57 and 11-58 of the EIS indicate the possibility of 13 scenarios which will result in Out of Hours activities, with up to 623 receivers being affected, including one instance of some 333 receivers being affected by the use of rockbreakers at night

SUBMISSION POINTS:

Council considers that this represents a significant potential impact on the adjacent Community and requests that 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

Additionally, experience indicates that unforeseen circumstances may result in a variation to these hours. In response to this experience, Council requests a commitment from Metro that the local Community will be provided with a minimum of one week's advance notification of any anticipated Out of Hours activities. A minimum of one week's advanced notification should also be provided to the local Community when high noise generating activities be programmed (eg rockbreakers).

Particularly given the statement that work outside daytime construction hours would include "work determined to comply with the relevant noise management level at the nearest sensitive receiver" it is also considered essential that a more refined noise and vibration assessment be carried out, taking into account the current COVID-19 response period which requires a larger than normal proportion of residents to work from home (and in anticipation that there is a high likelihood that a larger proportion of people will work from home than was previously the norm).

This will be of particular concern when rock breakers, concrete saws, chainsaws and chippers are in use. This additional noise and vibration management program should examine measures to minimise the impact on adjacent properties at all times (e.g. use of smaller capacity equipment, use of shears and crushers rather than rockbreakers, establishment of acoustic buffers and advance notification of residents when high noise generation activities are likely to take place).

SUBMISSION POINTS:

Consequently, Council requests a more refined approach to the assessment of noise during daytime hours and that:

- Metro examine measures to minimise the impact on adjacent properties at all times (e.g. use of smaller capacity equipment, use of shears and crushers rather than rockbreakers, establishment of acoustic buffers and advance notification of residents when high noise generation activities are likely to take place);

- an ongoing, real-time noise and vibration monitoring program should be initiated which includes regular consultation with adjacent residents and businesses (including adjacent commercial premises and childcare facilities);
- the noise and vibration monitoring program should include ongoing assessment of any structural impacts (due to vibration) on adjacent premises, most particularly the White Bay Power Station, Glebe Island Dykes, Glebe Island Bridge, Glebe Island Silos, Anzac Bridge and adjacent port structures;
- particular concern is expressed that the current physical state of White Bay Power Station makes this historic building particularly vulnerable to damage by ground-born vibration. Council suggests that this site requires detailed attention which does not appear to be detailed in the EIS. Consequently Council requests that permanent vibration monitoring stations be installed in and on the White Bay Power Station and that these be monitored in real-time with a view to initiating immediate action should it be required to ensure the structural integrity of this historic building be maintained;
- concern is particularly expressed regarding the possibility of controlled blasting being used at The Bays Station site (noting that this has not been specifically mentioned as a form of rock breaking on this site). Consequently, Council requests that details be provided regarding a comparison of the likely impacts of controlled blasting and machine rock breaking, and that only the lesser impactful form of excavation be used at The Bays station and mid station ventilation sites within inner West LGA;
- in addition to the precondition dilapidation surveys proposed for residential and commercial properties, surveys should also specifically include (but not limited to); White Bay Power Station, Glebe Island Dykes, Glebe Island Bridge, Glebe Island Silos, Anzac Bridge and adjacent port structures;
- the noise and vibration monitoring program should institute a quick response mechanism; particularly noting the possibility that construction may commence during the COVID-19 recovery period. As referred to earlier this may result in a large proportion of the workforce working from home, thus meaning that even if construction activity is limited to normal construction hours it may be disruptive to nearby residents working from home. Such a quick response mechanism should include but not be limited to a direct enquiry line (provided to all nearby residents and businesses) and a transparent line of accountability;
- an explanation should be provided as to why The Bays Station site has not been included in Table 11 – 17 “summary of vibration criteria exceedances”;
- concern is expressed regarding the noise monitoring level exceedances shown in table 11 – 58 for The Bays Station construction site. While the medium higher level exceedances (>20 dB) are low, Council expresses concern regarding the number of low to medium level exceedances (1-20 dB) anticipated during daytime out of hours and at night for residential receivers. Concern is also expressed regarding the daytime exceedances given the likelihood that an increased number of residents will be regularly working from home in the future.

Consequently Council considers that the total number of anticipated exceedances affecting residential properties is unacceptable and that additional measures should be introduced to reduce these.

4.3 Air Quality

In addition to the noise and vibration associated with construction activities, for both the Bays Station site and the proposed mid-station ventilation/service facility, air quality is of concern to Council and the Community.

SUBMISSION POINT:

In addition to the Metro's recognition of the need to manage and mitigate particulate and dust as critical elements of air quality, it is requested that (similar to the suggested noise and vibration monitoring program) a real-time monitoring and rapid response mechanism be put in place to ensure immediate amelioration of resident and business concerns.

4.4 Construction Traffic

Council commends Sydney Metro for establishing a strong hierarchy of access for their construction traffic management framework as outlined 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.

Additionally, the project's traffic and transport analysis examines implications for the existing public and active transport network. It is anticipated that opening of the Iron Cove Link will result in significant reduction in traffic on Victoria Road presenting opportunities for significant public and active transport improvements along that corridor (between Iron Cove Bridge and Anzac Bridge). It should also be noted that the Victoria Road Corridor, between CBD and Parramatta, is currently the subject of a major study to capitalise completion of the Iron Cove Link.

SUBMISSION POINTS:

Council requests that proposed hierarchy of access for 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.

In the case of the mid-station ventilation/service facility, Council notes that the streets in the vicinity of the site under consideration are generally unsuitable to heavy vehicles. Consequently it is requested that restrictions be placed on the size of any vehicles servicing the site, with no articulated vehicles (including truck and dog combinations) to be permitted to service the site (under normal circumstances).

Further, it is requested that:

- all heavy vehicle drivers including subcontractors be the subject of mandatory cycle and pedestrian awareness training, 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 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 corridor study has been completed, with a view to adapting construction traffic activity to the likely future configuration of Victoria Road, 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.

4.5 Proposed Alternative Construction Routes 1 and 2

In considering the proposed Alternative Construction Routes, Council raises the following:

It is considered that Alternative Construction Route 1 (using Victoria Road) may conflict with construction traffic generated by the proposed Western Harbour Tunnel civil site located on Victoria Road, immediately to the west of Darling Street.

Additionally, it is considered that Alternative Construction Route 2 (using Robert Street) has the following short-comings:

- queuing capacity at the Robert Street/Mullens Street intersection is very limited;
- traffic activity will increase in the vicinity as a result of a Bunnings hardware store planned for Parsons Street, Rozelle (adjacent to the Robert Street/Mullins Street intersection);
- construction associated with the expansion of the event facility at the Cruise Passenger Terminal is likely to conflict with Metro West construction traffic on this route;
- should it be necessary to use Alternative Construction Route 2, particular care should be taken to ensure that construction traffic does not conflict with peak arrival and departure periods for ship days at the Cruise Passenger Terminal and events being staged at the terminals event facility.

Council notes that in order to reduce impact on peak period traffic flows heavy vehicle movements are to be focused on the following times:

- 6 PM to 6 AM; and
- 10 AM to 3 PM.

While it is recognised that these movements will free up intersection capacity during peak periods concern is expressed regarding the noise associated with these movements particularly during late night and early morning periods. Concern is also expressed regarding summer/daylight saving late afternoon and evening periods. Noting that opening of the Rozelle Railyards Linear Park (and a potentially an upgraded foreshore area) will occur during the latter part of the proposed construction period, there is potential for significantly increased recreational use in areas adjacent to the Bays Station site.

SUBMISSION POINTS:

Consequently, Council requests that the proposed future Construction Traffic Management Plans:

- Re-examine the use of Alternative Construction Routes 1 and 2;
- Provide staged management plans which responds to the likely changing dynamics of the adjacent area (eg – construction of Western Harbour Tunnel, opening of Rozelle Railyards Linear Park, enhanced foreshore access, expansion of Cruise Passenger Terminal event facility); reduces the focus on late night/early morning traffic generation;
- should be subject to an ongoing monitoring program which assesses the overall impacts associated with cumulative construction activity, which may change incrementally as demand varies across the adjacent street network and that Council be actively consulted on the preparation of this plan;
- should note that queuing of construction vehicles must be fully accommodated on-site and should temporary construction vehicle layover be required this should not be accommodated on local streets;
- includes use of water transport for the removal of spoil and delivery of materials.

4.6 Construction Worker Parking

The EIS (10.5.5) states that

Due to the generally constrained nature of the construction sites, car parking for construction workers would not be provided at most of the Stage 1 construction sites. With the exception of the Clyde stabling and maintenance facility construction site, each Stage 1 construction site would typically provide a limited number of parking spaces intended to be used by trade vehicles or other light vehicles that are required for travel between construction sites.

Most construction sites are near public transport services and construction workers would be encouraged to use these services. At The Bays Station construction site, the feasibility of providing shuttle bus services to transfer construction workers to and from major transport interchange(s) would be considered.

While Council is a strong supporter of public transport for all travel, concern is expressed that an absence of on-site construction worker parking is likely to result in parking overflow into nearby streets.

SUBMISSION POINTS:

To assist in managing this Council requests that:

- a series of kerbside parking studies should be carried out before and after commencement of construction activity at both The Bays Station and the proposed mid-station ventilation/service facility. Should it be determined that construction is resulting in unacceptable levels of parking demand Metro West will be responsible for preparing, establishing, funding and managing appropriate kerbside parking schemes (to protect the interests of residents and the Community at large);
- Metro West should introduce a comprehensive green travel plan (mentioned but not detailed in the EIS) to encourage use of public transport by all construction workers. This plan should include but not limited to:
 - installation of workforce “trade lockers” for the storage of personal items including tools;
 - subsidised public transport/Opal cards;
 - shuttle buses from key public transport nodes;
 - quality end of trip facilities;
 - an on-site green travel plan coordinator.

4.7 Cumulative Construction Impacts

Effective management of the cumulative impacts of all development activity in and around White Bay is considered a critical factor. Consequently it has been referred to in numerous sections of this submission.

SUBMISSION POINTS:

In summary Council requests:

- continuous comprehensive consultation between all proponents and the community (including Inner West Council);
- the establishment of a transparent and accountable Community contact system with:
 - telephone and email addresses readily available to the Community;
 - prescribed response timelines that must be adhered to;
 - prescribed lines of accountability (particularly noting that numerous sub-contractors may be used on the project it is essential that a centralised contact system be established with a single point of contact responsible for solving stakeholder issues);
- a series of on-going pre-and post-commencement reviews including traffic, noise, vibration, hydrology, air quality, water quality, contamination and heritage issues, as well as various social and business impacts/concerns;
- the active involvement of Inner West Council in the assessment of the cumulative impacts of all projects in the area.
- all active transport links are to be maintained throughout the construction period and the final design of the new roads should include provision for safe, convenient pedestrian and cycle access. This access should specifically cater for access to a reinstated Glebe Island Bridge (to be used for walking and cycling as part of the redevelopment of The Bays Precinct), as well as links to the surrounding active transport network;
- A revised review of cumulative construction impacts should include:
 - the Western Harbour Tunnel activities associated with the civil tunnelling site proposed for 138 – 156 Victoria Road Rozelle;
 - the Western Harbour Tunnel/M4 – M5 link works associated with modification of the City West Link intersection with The Crescent (including active transport links);
 - expansion of the White Bay Cruise Passenger Terminal event facility.

4.8 Aboriginal Heritage

In proceeding with the construction proposed at the Bays Station site it is essential to recognise the significance of White Bay and the surrounding area to the local indigenous people. While documentation on aboriginal sites and artefacts in the vicinity is limited, anecdotal advice from the local Community indicates that the area is particularly significant and should be dealt with sensitively and in accordance with all necessary protocols.

SUBMISSION POINTS:

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 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;

4.9 Non-Aboriginal Heritage

Council commends 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.

4.10 Biodiversity

It is considered that the cumulative impacts on biodiversity in this area will result in further deterioration and fragmentation of vegetation that is already fragmented. The impacts of this issue have already been amplified as many areas of vegetation have been cleared for other projects such as Rozelle Interchange. Consequently, while the EIS repeatedly refers to vegetation on and near the site as "highly degraded" it is nevertheless habitat for numerous forms of fauna and should be preserved wherever possible. Further, it is noted that, in relation to the removal of vegetation, the EIS indicates that highly mobile species (eg birds) would be able to temporarily move from the area but that less mobile species (such as small mammals and reptiles) would be at risk.

Concern is expressed that no details are provided to indicate a phased approach to the removal of existing vegetation and remediation through the planting of new vegetation.

SUBMISSION POINTS:

Consequently, it is requested that:

- 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 and with equivalent planting provided to offset vegetation removed; to be planted in an area that is protected from future development and adjacent to other vegetated area to increase patch size;
- 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 that care should be taken to ensure both maintenance of their habitats and that construction activity does not disturb them;
- additional consideration should be given to biodiversity impacts of any proposed mid-station ventilation/service facility as the location is currently under consideration are adjacent to several lightly wooded areas including biodiversity offsets sites created as a result of habitat lost due to the construction of the Inner West Light Rail.

4.11 Miscellaneous/Additional Consideration

SUBMISSION POINTS:

Further, 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;
- a comprehensive Community Engagement Process be adhered to throughout the planning and construction phase of the project;
- Finally, 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.