



**SUBMISSION FROM INNER WEST COUNCIL TO THE
DEPARTMENT OF PLANNING, INDUSTRY &
ENVIRONMENT**

**ON THE ENVIRONMENTAL IMPACT STATEMENT FOR THE
PROPOSED WESTERN HARBOUR TUNNEL & WARRINGAH
FREEWAY UPGRADE**

30 MARCH 2020

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INTRODUCTION

Council appreciates the opportunity to comment on the Environmental Impact Statement (EIS) for the proposed Western Harbour Tunnel (WHT) and Warringah Freeway Upgrade. Only the WHT component of this project is within the Inner West Council area, so this submission focuses on the WHT. As the project essentially the same as that presented in the 2018 WHT Reference Design, most of the issues assessed here are the same as those in Council's Reference Design submission.

A draft of this submission was circulated to Councillors and posted on Council's website with a request for comments prior to the submission deadline, to be integrated into the final version. Any comments received after the deadline will be forwarded to the Department of Planning, Industry & the Environment (DPIE) as a late addendum to this submission.

SUMMARY OF ISSUES

Following is a summary of the main issues raised in this submission:

- As only the WHT component of this project affects the Inner West Council

area, Council's submission focuses on the WHT only

- Council has a long-standing position of opposing inner-urban motorways, including WestConnex & WHT
- Council prefers traffic-reduction solutions to addressing congestion, including public and active transport, travel demand management and transit-oriented development, with some modest/targeted road improvements
- Though the EIS is comprehensive in its coverage of issues, Council does not agree with some of its key findings, and is of the view that benefits of the project are exaggerated and the negative impacts downplayed
- Council has serious concerns about WHT construction impacts based on its experience with WestConnex and continues to argue that work on inner-Sydney motorways should cease until the NSW Government completes an infrastructure construction health impact study
- For all four WHT construction sites within the Council area, concerns are raised about noise, vibration, dust, odour, property damage, heavy vehicle movements, and worker parking demand
- At Yurulbin Point, concerns are also raised about impacts on Yurulbin Park, marine flora/fauna, marine water quality, barge movements and the risks involved in the construction of cofferdams
- Council opposes use of the former Balmain Leagues Club site as a WHT construction site because of construction impacts on adjacent homes, shops and schools, and the delay in the redevelopment of the site that includes a leagues club
- Council seeks confirmation that WHT construction will not delay delivery of the WestConnex Rozelle Rail Yards (RRY) recreation area
- Council is concerned about cumulative road safety and congestion impacts on Victoria Road, City West Link and adjoining roads from construction traffic associated with WHT, WestConnex and other projects planned for the Rozelle area
- Safety and congestion concerns are also raised about operational traffic – in particular, increased traffic along Johnston Street and nearby local roads, noting that these roads include residential and school uses
- Council does not believe the operational traffic benefits of the project are sufficient to justify the project
- Based on experience from WestConnex, Council is keen to ensure that WHT construction does not sever walk/cycle access or create unacceptable diversions
- Council is concerned about the project's air pollution impacts (particularly on sensitive uses such as schools), including construction dust and growing vehicle emissions from surface traffic growth
- Filtration of WHT vent stacks is sought, consistent with a recommendation from the 2018 WestConnex Parliamentary Inquiry.

STRATEGIC JUSTIFICATION

Council has a long-standing position of opposing inner-Sydney motorways, including WestConnex and WHT. Council believes motorways create problems (not benefits) for the Inner West and Sydney region in the long-term. In particular, induced traffic erodes Sydney's liveability, air quality, transport affordability and economic productivity. Council is also concerned about the more immediate issues around construction impacts, and its experience with WestConnex shows that these impacts are significant and widespread.

Instead of motorways, Council supports transport infrastructure and behaviour change options that include public transport, active transport, travel demand management and transit-oriented development, with some modest/targeted road network improvements. With this mix of options, traffic congestion can be more effectively addressed through traffic reduction rather than increasing road capacity, and conditions for sustainable development can be created.

As was the case for WestConnex, Council believes there is lack of strategic justification for this project. It appears an early decision has been made to proceed with a motorway and other transport options have not been seriously considered. Nor do the WHT EIS traffic forecasts support the argument that the project will in fact solve congestion in the long-term.

In responding to earlier stages of WestConnex, Council had raised issues about WestConnex adding to congestion at the intersection of the City West Link and the ANZAC Bridge. The NSW Government had at that time responded that this would not be the case, but now WHT is being justified on relieving congestion at those points in the network. Council is concerned that the NSW Government will use congestion created by WHT to justify the next section of motorway and so on, at the expense of Sydney's liveability and economic performance.

The premise that the project will result in significantly reduced travel times does not appear to be reflected in the WHT traffic data provided, as the travel time savings indicated are likely to be of the order of two minutes per vehicle trip. Rather than focusing on reduced travel times for private vehicles, the NSW Government should focus reducing travel times for public transport. By *reducing* traffic this would be the most effective means of improving the consistency and reliability of private vehicle travel.

A more detailed discussion of Council's strategic arguments against inner-Sydney motorways is included in its August 2018 submission to the NSW Legislative Council's Inquiry into WestConnex, available from the [inquiry's website](#) (Sub No. 379). Appended to this submission is a review of the project's business case by SGS Economics and Planning – concluding that the project business case is poor and WestConnex is not justified.

In October 2017 Council resolved that *"Inner West Council formally adopts a position of continued opposition in the strongest terms to the WestConnex project, both approved and future stages including Stage 3, consistent with the opposition of the former councils of Ashfield, Leichhardt and Marrickville."* In December 2017 Council had resolved to *"Write to the Minister for Roads expressing its opposition to the Western Harbour Tunnel and Beaches Link project as part of its overall position of opposing inner-Sydney motorways and preference for public transport options."*

Notwithstanding this opposition, Council continues to work with NSW Government agencies, project contractors and the community to ensure that impacts are minimised and benefits are gained wherever possible. In doing so, Council has raised many issues about local impacts from WestConnex - environmental, health, traffic, transport, construction and economic impacts, as well as lack of adherence to good planning and management practice. Council is concerned that these impacts will be extended in duration and spatial extent by the WHT should it proceed.

Council requests clarification on the WHT EIS assumptions input into the model, particularly in relation to:

- opportunities for public transport enhancements in combination with demand management, changes to regional strategic land use patterns (reduce travel demand particularly in relation to harbour crossing demand), or at the very least conversion of

existing cross-harbour trips from private vehicles to public transport

- mode shifting from public transport to private vehicles
- the environmental and social implications of the project's induced traffic demand
- the likely conversion of trips across the harbour to public transport if there was increased frequency/capacity of public transport and a higher-priced tolling regime, particularly in peak periods.

The need for the project appears to be based on the additional traffic volumes created from the completion of WestConnex and the conclusion that unless reduced, the resulting congestion would divert traffic from the State to local roads. This is not supported by data in Table 8-1 of the EIS's Traffic & Transport Technical Paper. This data indicates an average vehicle travel time difference through the network in 2027 of 1.8 minutes per vehicle (Do minimum = 09:24, while Do Something Cumulative = 07:26). For 2037 the EIS predicts a difference of 2.3 minutes per vehicle (10:23 against 07:46).

Council questions the ability of these travel time savings to create noticeable improvements across the road network or to prevent rat runs developing on local streets. Council also questions the validity of spending substantial funding to achieve relatively small travel time improvements, when consistency and predictability of travel times would be a more valid priority. Council requests the NSW Government examine alternative approaches to reducing congestion that focus on traffic reduction and travel time consistency, not increased road capacity and vehicle speed.

CONSTRUCTION SITE IMPACTS

Yurulbin Point (WHT 4 & WHT 5)

Although EIS's assessment of impacts around Yurulbin Point is comprehensive, Council reiterates the concerns it expressed in its 2018 submission on the WHT *Reference Design*:

- impacts on marine life from dredging the harbour floor and laying the immersed tube
- the risk that this activity, along with construction of the cofferdam, will lead to contaminated sediments polluting the harbour and imposing odour and other health impacts on residents near this worksite and at White Bay
- significant noise, vibration, health and other impacts on nearby residents for several years, particularly those at the end of Louisa Road and in Numa Street, Birchgrove
- the potential for damage to houses and other buildings where wherever tunnels are at shallow depth, as would be the case near Yurulbin Point
- inherent construction risks involved in constructing and decommissioning the cofferdam, and joining the driven tunnel to the immersed tube
- impacts on trees and other valued features of Yurulbin Park and denial of public access to this park during the construction period
- potential negative impacts from the relocation of the Birchgrove Ferry Wharf.

Council acknowledges that Yurulbin Park is owned by the NSW Government (not Council) but continues to oppose removal of any publicly accessible open space for motorway construction. Although in this case the park will ultimately be restored and upgraded, loss of public access of over several years will nonetheless have a negative impact on the local community and all park users.

Although the construction site would be within an acoustic shed, the shed will not (and cannot) fully shield residents from all noise, dust, vibration and possible odour impacts,

particularly given their close proximity. These impacts would come from a range of activities within and around the park, including noise from machinery and barge movements. Council is relieved that all spoil movements from the Yurulbin Point sites will be by barge, noting that it would be difficult (if not impossible) for large trucks to access this site through local narrow streets, and the impacts would be intolerable.

Council is also relieved that worker access to these sites would be by boat from White Bay but doubts the contractor will in practice be able to prevent *all* workers attempting to gain access to these sites by car. Even a moderate level of light vehicle congestion and increased parking demand along Louisa Road and around Birchgrove Oval would have a major impact, as all streets in the area are narrow and already subject to strong parking demand. Strict measures are therefore needed to prevent any worker parking in this area, and these measures should be implemented prior to the start of construction.

As is explained in the EIS, Yurulbin Park was designed by Bruce Mackenzie and Associates (landscape architects), and landscaping was implemented between 1972 and 1977. Bruce Mackenzie also designed the park at nearby Illoura Point in 1970. Both parks were seminal works that demonstrated two main philosophies that would become dominant in Australian landscape architecture during the period. One was a design that focused on creating an environment in sympathy with its natural origins using Australian native plants, the other a desire to create an escape from the stresses of urban life.

The park incorporates a sequence of spaces using natural stone elements and outcrops. The hand-hewn sandstone path, the slipway, concrete walls and heavy timber elements incorporated into the design of the park remain as a reminder of its former commercial use. The design received a 1982 merit award from the Royal Australian Institute of Architects. In 1994 the name of the point (and park) was changed to from Longnose Point to Yurulbin Point to reflect the Aboriginal heritage of the area.

In addition to concerns about loss of open space, Council has had a long-standing concern about the number of trees that have been lost to WestConnex projects in recent years. It is noted from the arboricultural impact assessment in EIS Appendix W that 55 trees are to be directly affected in Yurulbin Park. Council believes these trees are significant in the local context.

There is a need for State agency and project staff to consult with Council's Urban Forest and Ecology team to identify trees with the highest retention value. Trees should be replaced with mature plants in a 2:1 ratio. Offsets should include the introduction of ecological restoration features such as the development of a saltmarsh area adjacent to the park. Yurulbin Park consists of primarily of native plantings, and it is recommended that the map on EIS Page 19-11 to be updated to show the area as native plantings.

The park is a popular, well-used passive recreational space and a site for weddings and family events. Importantly, Transport for NSW (TfNSW) operates a ferry wharf at the base of the park as part of the F8 ferry route between Cockatoo Island and Circular Quay. This route operates 23 times a day Monday to Friday in each direction, 17 to 18 times a day on Saturdays in each direction, and 12 to 13 times a day on Sundays and public holidays in each direction. Patronage for the Birchgrove Wharf in the financial year 16/17 was approximately 65 customers per day. A new pontoon ferry wharf, constructed by TfNSW, was opened on the 24 April 2018.

Council recommends that TfNSW undertakes a strategic review of transport services to/from this area. Consideration should be given to options to relocate the existing ferry wharf based on patronage data. A more suitable and/or supplementary ferry wharf site could be the Miklouho-Maclay Park at the end of Grove Street in Birchgrove. This location is practical, as

DDA compliant access could be readily achieved and this site is serviced by the 441 bus.

There are a four of aboriginal cultural sites at Yurulbin Point which have all been identified and described the EIS (Pages 15-7 & 15-8), with protection measures outlined. These sites are:

- Long Nose Point 1 45-6-1901 LEP item A7 Shelter with midden and art
- Yurulbin Cave 45-6-2287 LEP item A6 Shelter with midden and art
- Shed Cave 45-6-2672 LEP item A4 Shelter with midden and art
- Five Hands Shelter 45-6-2967 LEP item A8 Shelter with midden and art.

Council's report has not been cited by local Aboriginal people and has not been endorsed for release by Council. The Council report identifies the following three sites, but not Five Hands Shelter:

- Long Nose Point 1 45-6-1901
- Yurulbin Cave 45-6-2287
- Shed Cave 45-6-2672.

The Council report also identifies a further site recorded as Birchgrove 45-6-1809 which is not mentioned recorded in the EIS. Importantly, the EIS does not include condition assessment data or cultural significance data for any of these sites. It would be appropriate to convey some of what is in the Council report to ensure a public record is created ahead of any construction commencing.

The Council report contains the following relevant information:

- *AHIMS Site #45-6-1809 was unable to be accessed during the site inspection, but is presumed as still existing at the back of the property. It is noted that AASC could not identify any Aboriginal occupation deposit within the shelter in 1995, suggesting that it was covered by infill. Thus, it is most likely that shell material would also not have been identified, should access to the property have been granted on the day of the current site inspection. The site coordinates identified on the AHIMS database are inaccurate, as is the site designation of shelter with art and midden.*
- *Assessment: Moderate archaeological research potential, local representativeness and low-moderate overall significance.*
- *AHIMS Site #45-6-1901 consists of shell midden deposit beneath a rock shelter at the base of the northern cliffs adjoining the site. The site coordinates identified on the AHIMS database are inaccurate; the site is located approximately 200m to the north of these coordinates. It is also recorded on the AHIMS as an open midden, rather than a shelter with midden. No shell material was seen during the site inspection, but it is noted that the site card identified the property owner as reporting that a very thick deposit of shells was exposed when [the retaining] wall collapsed. Further, AASC suggested that the shell deposit may have been covered by infill during their inspection in 1995. It seems likely that the shell midden deposit reported by the owner in 1989 may be present beneath the current ground surface of the shelter, which is presently covered by grass and leaf litter. Apart from the retaining wall, the shelter has also been modified by*
- *stairs extending down from the house, a column placed to support the protruding shelter roof, the installation of an electrical power point, and storage of items.*
- *Assessment: Moderate archaeological research potential, local representativeness and low-moderate overall significance.*
- *AHIMS Site #45-6-2287 is as a shelter with midden and art, located at the base of the cliffs adjoining the location. The site coordinates identified on the AHIMS database are roughly accurate, although the site is located approximately 25m to the east of these*

coordinates. The site card also identifies the site being present at the location, but it is in fact at the back of the adjacent property. A few small fragments of rock oyster were seen during the site inspection, but the shelter floor was partly obscured by vegetation, and chickens were seen scratching at the ground surface. Stairs have also been cut into the side of the shelter, and it has been used for storage. None of the art recorded on the site card was visible during the current site inspection and painted and scratched/carved graffiti covered parts of the shelter. It is noted that the site card identified that, between 1979 when the site was first recorded, and 1991 when the site card was updated, soil and shell midden has been dug out by the previous owners...the art had faded very badly and the cave floor had been almost totally disturbed. Further, only two barely discernible white hand stencils and an area of red pigment were seen by AASC in 1995. It seems likely that some shallow shell midden deposit may be partly obscured beneath vegetation, but much of it has probably been removed by previous digging and cutting for the stairs. In the 20 years since the last survey (by AASC), the art seems to have faded entirely from visibility to the naked eye.

- *Assessment: Moderate archaeological research potential, local representativeness and low-moderate overall significance.*
- *AHIMS Site #45-6-2672 was unable to be accessed during the site inspection but is presumed as still existing at the back of the property. It is noted that, by 1997, the shelter had been hidden by a shed built in front of it. No such shed was visible in the location indicated by the sketch on the site card. The site coordinates identified on the AHIMS database are inaccurate, as is the site designation of shelter with habitation structure.*
- *Assessment: Low archaeological research potential, local representativeness and low overall significance.*

Former Balmain Leagues Club (WHT 2)

In 2018 when the NSW Government first announced that the former Balmain Leagues Club ('Tigers') site would be used for the WHT, Council formally expressed its opposition. This opposition was based on the significant construction impacts and the undue delay of the imminent redevelopment of this site. This delay would likely mean a leagues club would not be established in the new development as had been planned.

As part of Council's efforts to facilitate redevelopment of the site, Council adopted an amendment to the site-specific Development Control Plan (DCP) provisions (Part D of Leichhardt DCP 2000) in June 2019. The amendments aim to facilitate the redevelopment accordance with the provisions of Leichhardt Local Environmental Plan LEP 2000 (LLEP 2000) while achieving improved urban design, environmental and community outcomes. Council considered amendment of the DCP as the most appropriate means of influencing the outcomes for the precinct.

Page 23 of EIS Chapter 20 states that "a private residential property on Victoria Road would be permanently acquired for use as a construction support site (WHT2). The land acquired for the project would not impact on the long term viability of the site to continue to be used for private residential purposes". Conversely, page 30 states that "the Victoria Road construction support site (WHT2) would also include a privately owned residential property on Victoria Road to the north of the former Balmain Leagues Club site. The site would be acquired or leased and temporarily converted to a construction support site for the duration of construction". Clarity is required with regard to the NSW Government's intentions for this property.

Page 23 of EIS Chapter 20 identifies the current land use zoning of 138-172 Victoria Road as 'Deferred Matter'. This is incorrect - the site is zoned Business under Leichhardt LEP

2000. The EIS should confirm if the property is to be leased or purchased and the period that it will be required, providing Council and the community certainty with regard to its land use future.

Page 103 of EIS Appendix J *Non-Aboriginal Heritage* discusses impacts on The Valley Heritage Conservation Area (HCA) and identifies three properties within the Victoria Road construction site (WHT2) to be demolished – Lots 101 and 102 DP 629133 and Lot 104 DP733658 (No. 1 Waterloo Street and 697 Darling Street). Appendix J states that *“the buildings to be demolished, while previously included within the heritage conservation area, have been excluded from the current heritage boundary, therefore suggesting their limited contribution to the overall significance of the conservation area. Direct impact on the heritage conservation area is considered to be negligible”*.

This is incorrect, as the buildings have not been specifically excluded from the current HCA. The entire Balmain Leagues Club Precinct has been deferred from Leichhardt LEP 2013 and as such Leichhardt LEP 2000 applies to this site. The extract from Part D of Leichhardt Development Control Plan 2000 (below) shows these properties hatched in black. The DCP figure confirms that the subject properties are within a HCA under Leichhardt LEP 2000.

The amended Part D of Leichhardt DCP 2000 strived to achieve a balance between improving the precinct’s accessibility from Darling Street while retaining as much of the continuous shop-frontage as possible and minimising impacts on the HCA. The DCP achieves this by requiring retention of the street frontage of No. 697 Darling Street (Lot 104 DP733658) and allowing demolition of No.1 Waterloo Street (Lots 101 and 102 DP 629133). There is no evidence that No. 697 Darling Street and No.1 Waterloo Street do not contribute to the HCA and streetscape - therefore demolition of the properties to facilitate the construction site is not supported.



EIS Appendix J notes that as the demolition will occur on the periphery of the HCA, *“the impact is considered to be minor”* (p.104). However, given the prominent location of the properties on Darling Street, the impact of their demolition will undoubtedly be significant.

EIS Chapter 22 states that *“due to the level of dilapidation at 138–172 Victoria Road (the site of former Balmain Leagues club), the proposed temporary noise wall around the Victoria*

Road construction support site (WHT2) is not expected to cause significant degradation to the existing visual amenity at Waterloo Street. A moderate visual impact is expected for residential receivers at Waterloo Street (viewpoint 1) and low visual impact for receivers within the Waterloo Street road corridor (viewpoint 2)" (p.35).

The EIS however lacks detail on the design of the temporary structures on the site, hence the visual and amenity impacts (including overshadowing) cannot be verified. Detail should be provided on the materials and dimensions of these structures - in particular, the height and setbacks of the acoustic shed, the workshop and the noise barrier. This is critical given the site's prominent location and proximity to houses, a HCA, heritage items and the Darling Street commercial precinct.

Although Council is relieved that spoil trucks would only use main roads to access this site (entering from and exiting to Victoria Road) and loading operations would occur within an acoustic shed, there would still be noise, vibration, dust, road safety and congestion impacts from the significant number of truck movements and 24/7 underground works. As mentioned above in relation to Yurulbin Point, acoustic sheds do not (and cannot) fully prevent noise, dust and vibration impacts.

Given the high number of daily movements (420 heavy vehicle and 230 light vehicle movements to/from this site per day), Council is also concerned that trucks awaiting their entry slot on Victoria Road and/or narrow residential streets surrounding this site will create noise and traffic safety impacts. Careful co-ordination using radio communication and GIS tracking will be needed to avoid queuing. Council is also concerned that queuing will negatively affect the viability of the numerous bus services in operation along Victoria Road

Residents at the rear of the site on Moodie, Waterloo and Darling Streets are within very close proximity, so would be most vulnerable to impacts. Local businesses would also be affected - likely experiencing a downturn in trading as customers avoid the area because of the negative visual impact of the Victoria Road site and the traffic congestion created by the spoil trucks other construction traffic.

Impacts from this site will be in addition to impacts from the nearby WestConnex Stage 3B Victoria Road construction site. Residents and remaining businesses on or near Victoria Road from Darling Street to the Iron Cove Bridge would endure noise, vibration, dust, truck traffic impacts and worker parking pressures from both projects. Parking demand pressures would come not only from workers accessing the site, but from the removal of the existing car park on the site.

Local residents have been concerned for some time about traffic congestion on main roads around this site, including Victoria Road, Darling Street and Balmain Road. The proposed partial closure of Moodie Street as part of WestConnex Stage 3B would exacerbate traffic impacts, as traffic would not be able to avoid the Darling Street / Victoria Road intersection. This build-up of traffic would create traffic safety issues for all road users – particularly pedestrians.

Trucks accessing the site would create an unacceptable road safety risk for the numerous students and their parents walking, cycling and travelling in cars to access local schools. The schools most affected would be Rozelle Primary School and the Balmain Campus of Sydney Secondary College. The highest risk areas would be at the Victoria Road frontage of the site and at the signalised crossings of Victoria Road at Darling and Wellington Streets.

Local residents point to a high degree of risk-taking by drivers on Victoria Road and surrounding streets during congested periods, as drivers seek to avoid delays. With the addition of heavy vehicles from WHT, WestConnex and other projects in the area, risk-taking

(and consequently danger for pedestrians and all road users) is likely to increase.

Parents associated with Rozelle Primary School are concerned about air quality impacts on their children from the WestConnex Stage 3B vent stack on Victoria Road. The range of air quality impacts from WHT activities at the former Tigers site would be from truck diesel emissions and dust emitted from spoil handling combined with existing surface traffic emissions from Victoria Road and future emissions from the nearby WestConnex stack.

Health and air quality experts agree that air pollution at any level has a negative impact on health, and this impact is greatest amongst children. The noise impact on children's learning at these schools from the operation of the Victoria Road site is also a concern to parents.

White Bay & Glebe Island (WHT 3)

The EIS identifies the risks, impacts and proposed mitigation measures associated with handling contaminated material from the harbour floor at the Yurulbin Point and White Bay sites. Nonetheless, concerns remain about these risks/impacts based on Council's experience with WestConnex. Even with adequate regulation and best intentions, there is always a chance of an unforeseen spill or other pollution event, and this could take some time to rectify. The significant leachate odour impacts on the St Peters community from the WestConnex St Peters Interchange site illustrates this point. This impact was not foreseen, took several months to rectify and the contractor was fined.

In its submission on the WHT *Reference Design* and at various WHT meetings and forums, Council and the community have related their concerns about cumulative impacts from WHT and other projects at or around White Bay and Glebe Island. These other projects include WestConnex Stage 3B, concrete batching plant, port multi-user facility, the White Bay passenger cruise ship terminal, proposed Sydney Metro West and future redevelopment of the White Bay Power Station site. Given the size and nature of these projects, these impacts would affect a wide area over several years.

It is reassuring that the WHT EIS includes a whole chapter for the assessment of cumulative impacts. Notwithstanding, proximity of the WHT White Bay construction site to the cruise passenger terminal and other activities has the potential to impose significant noise and other impacts on Balmain and Pyrmont residential areas (and the passenger terminal itself) over several years.

Beyond assessing cumulative impacts, Council would like the NSW Government to develop an integrated master plan for the White Bay / Glebe Island site that considers opportunities to develop social and recreational opportunities, drawing on the bay's rich and diverse history. This master plan should align with the future Sydney Metro West and facilitate accessible active transport links around the foreshore to/from the Balmain Peninsula.

In its submission on the WHT reference design, Council had raised issues with traffic congestion and road safety impacts from the increased number of large trucks that will service the activities at White Bay and Glebe Island via James Craig Road and City West Link. These movements would exacerbate existing congestion at major intersections in the area, including The Crescent / City West Link intersection.

Even if the phasing of lights at these intersections were to be altered in an attempt to improve traffic flows, congestion will be significant due to the sheer number of trucks involved. The altered phasing would also likely increase congestion at other intersections. Added to this will be periods of reduced capacity when intersections of City West Link with The Crescent and Victoria Road are reconfigured as part of WestConnex Stage 3B.

It is appropriate that the WestConnex Stage 3 approval and the WHT EIS have ruled out use

of Robert Street. Council continues to argue that trucks servicing the other proposed construction uses at White Bay not be allowed to use that street and that they be restricted to James Craig Road. Robert Street is already heavily congested, and due to the number of small businesses fronting that road it is not suitable for large trucks. Further discussion of construction traffic impacts is below.

Although construction trucks would use main roads (not local residential streets), concerns are still raised about congestion and road safety impacts (discussed above) and ambient noise affecting residential areas in Rozelle, Balmain, Lilyfield and suburbs along the main trucking routes to the west. It is expected that ambient noise would be an issue given the sheer number of trucks from multiple activities and movements.

Former Rozelle Rail Yards (WHT 1)

Given spoil removal from the WHT Rozelle Rail Yards (RRY) site would be minimal compared to the Victoria Road site, it is expected that that most surface construction activities at this site would be carried out during standard daytime construction hours. As such, Council does not expect noise, vibration, dust and other impacts on surrounding residents to be as significant as the other WHT construction sites. Notwithstanding, it is appropriate that all impacts from this site are minimised, particularly in recognition of the significant impacts that will have been generated by WestConnex Stage 3B in this location in preceding years.

In its submission on the WHT *Reference Design*, Council was concerned that use of the RRY site for WHT would delay completion of the RRY recreation area. It appears from the EIS that this would not be the case, but Council would like this to be confirmed.

CONSTRUCTION TRAFFIC IMPACTS

The EIS recognises that it is not realistic to consider the construction activity of the WHT in isolation from the numerous other projects in the area. Council supports the NSW Government's establishment of the Cumulative Traffic Working Group to oversee and coordinate the cumulative growth of construction traffic in the area. To ensure that the interests of the Inner West community be provided with appropriate representation and to assist in better facilitating the coordination of construction activity, it is requested that Inner West Council be included in the working group or that a similar coordination group be established specifically for the Inner West LGA (with Council included in its membership).

In considering cumulative impacts, concern is expressed for the 2022/23 period when the three transport projects will be in their construction phases, the Cruise Passenger Terminal function facility will be fully operational, and the Bays Precinct redevelopment will be proceeding. It is a concern that traffic modelling in the WHT EIS does not appear to include detailed analysis of the Metro West project or the increased capacity of the cruise passenger function facility.

Based on the EIS, it is anticipated that the construction activity will add a total of 2,350 vehicles to the area's existing traffic (1,285 heavy vehicles and 1065 light vehicles), as follows:

- Rozelle Rail Yards (City West Link) - 165 heavy vehicles and 305 light vehicles
- Balmain Leagues Club (Victoria Road) - 420 heavy vehicles and 230 light vehicles
- White Bay (James Craig Road and Port Access Road) - 700 heavy vehicles and 530 light vehicles.

This additional traffic will result in increased delays which has the potential to encourage diversion of traffic to local roads (rat runs). These rat runs do not appear to have been addressed in any detail in the EIS. The EIS does however summarise the traffic impacts in relation to increased delays and reduced levels of service at key intersections.

This analysis indicates the following:

- network-wide, within the Rozelle/White Bay Area; the *Cumulative Traffic Working Group* has determined that cumulative construction activities have the potential to:
 - o increase traffic demand by up to 3%
 - o create up to 3 additional stops per trip
 - o reduce average trip speeds by 5% (AM) and 14% (PM)
 - o slow AM travel times on City West Link westbound by up to 5 minutes/vehicle
 - o slow PM travel times on City West Link and Victoria Road by up to 2 minutes/vehicle
 - o slow AM travel times on Victoria Road northbound by up to 3.5 minutes/vehicle;
 - o result in delays for northbound buses on the ANZAC Bridge - Victoria Road corridor of between 1.5 and 2.5 minutes per vehicle.
- the intersections highlighted by the *Cumulative Traffic Working Group* include Victoria Road with:
 - o Evans Street (PM) – Level of Service E becomes F
 - o Gordon Street (PM) – Level of Service E becomes F
 - o Robert Street (AM) – Level of Service E becomes F
 - o The Crescent (AM) – Level of Service D becomes E
 - o The Crescent with City West Link (PM) - Level of Service E becomes F.
- City West Link intersection with Balmain Road (PM) - Level of Service E becomes F - noting that severe delays are already being experienced on the City West link between Balmain Road and James Street as a result of WestConnex Stage 1 (M4 East) opening
- during the AM peak the intersection of The Crescent with the City West Link will experience a 10% increase in delay, and the intersection of The Crescent with James Craig Road will experience a 27% increase in delay during the PM peak period.

Council is concerned that the combined impact of all these factors will increase the likelihood of traffic diverting onto local streets and making it more difficult for people to access local businesses and homes. This is particularly of concern for residents of the Rozelle and Lilyfield areas, who will have been subjected to a multitude of impacts from WestConnex for up to four years and will already be suffering from construction fatigue.

Based on experience from construction of WestConnex, the Westgate Tunnel and similar infrastructure projects overseas, the following initiatives are considered essential in relation to the operation of construction vehicles and their drivers:

- all drivers should be certified specifically for the project and its designated construction traffic routes
- the driver certification process should include safety awareness in relation to all road users and a requirement to walk and ride around the construction site and any key locations identified as having high levels of conflict to gain an understanding of the needs of vulnerable road users
- all vehicles should be clearly identified as WHT vehicles with a unit number clearly displayed
- all vehicles should include a clearly visible contact number for complaints
- penalty systems should be introduced for drivers who breach specific safety, environmental or amenity provisions
- all vehicles should be fitted with GPS tracking, which can be monitored from a central

control point.

Additionally, construction management plans should include a comparison of the use of single trucks and truck-and-dog combinations. This is to assess the safety and construction time/cost implications of different truck types. This assessment should be publicly exhibited prior to approval of construction management plans.

Council is concerned about vehicle movement to and from WHT construction sites that will use Johnston and Booth Streets, Annandale, as this would have a negative impact on the community and the business environment of the Annandale village. Use of these roads would also create traffic safety issues for all - particularly pedestrians, including the elderly and children from the local schools.

Impacts on the Annandale village would be from truck diesel emissions and dust - making the village not suitable for outdoor dining, fruit and vegetable street stalls, florists and other businesses who display goods on footpaths. This will result in reduced foot traffic and visitation to the area, affecting business sustainability.

While phasing of lights at intersections can be used to mitigate traffic flows, the congestion and negative impacts would still be an issue due to the number of trucks involved, i.e. 700 heavy vehicle movements and 530 light vehicle movements per day.

In its submission on the WHT *Reference Design*, Council stated that it expected worker parking to be provided at White Bay / Glebe Island for all WHT workers, and expects there would be procedures in place to ensure that workers have no option other than use the parking provided. Council pointed out that it is imperative that workers are not able to park on streets near WHT construction sites, as all surrounding streets are narrow and already subject to heavy parking demand.

Council is disappointed that the EIS includes no detail on worker parking arrangements other than to say that there will be limited worker parking at White Bay. The EIS states that where on-site parking is not provided or where provision of on-site parking cannot accommodate the full construction workforce, the workforce would be required to park on the surrounding road network. Though the EIS states that parking details will be provided later at the construction management plan stage, Council believes this issue to be important enough to be assessed in detail at the EIS stage.

Council does not agree with the EIS that the workforce be "required" to park on surrounding streets, nor does it want to be put in a position (as has been the case for WestConnex Stage 3B), where it must move to imposing resident parking schemes as a way of dealing with worker parking demand. Council would prefer a package of parking demand-reduction measures (including use of public transport) that are strongly enforced.

All the WHT construction sites have limited availability of parking, but in the case of the Yurulbin Point, availability is almost zero. It is noted that the project will result in the loss of about ten parking spaces at Yurulbin Point, but Council does not agree with the EIS statement that *"the surrounding local road network, including Louisa Road, could accommodate these lost parking spaces and therefore parking impacts would be minor and manageable."* Council would like *all* workers at that site to travel by public transport (bus or ferry) or by boat from White Bay.

OPERATIONAL TRAFFIC IMPACTS

Traffic forecasts in the EIS indicate that once the project is operational, the following traffic

increases will be result in and around Rozelle: 2027 AM peak - 5,800 vehicles; 2037 AM peak - 8,200 vehicles; 2027 PM peak - 4,100 vehicles; and 2037 PM peak - 6,000 vehicles. At the Balmain Road / City West Link PM peak congestion will be worse than without the project.

Almost all of the EIS's assessment of operational traffic is limited to the efficiency of intersections or links on the State road network. With the exception of a simple set of maps, appended to the *Traffic & Transport Technical Working Paper*, there is no detailed assessment of traffic increases on local streets.

The maps indicate increased traffic on numerous streets in the Rozelle, Lilyfield and Leichhardt areas, but no traffic volume figures are given. These streets are Johnston Street, The Crescent, City West Link, Balmain Road, Darley Road, Norton Street, Marion/Styles Streets, Moore/Booth Streets, Pyrmont Bridge Road, Parramatta Road, Allen Street and William Street.

Whilst increased traffic on *any* street is a concern for Council, the street which appears to be the most adversely affected is Johnston Street. As was pointed out in Council's submission on the WHT Reference Design, although Johnston Street is a State Road, it is flanked by residential uses and includes the Annandale neighbourhood shops, three childcare centres, two schools and two churches. Council is of the view that *any* increase in traffic on Johnston Street is unacceptable.

Also of concern to Council are increased traffic volumes on Parramatta Road and City West Link. This conflicts with State and local government plans for Parramatta Road that would improve public transport and increase population and employment densities. The City West Link could not absorb additional traffic as it is now beyond capacity and is experiencing increased congestion from the opening of WestConnex Stage 1 (M4 East).

Potential exists for the current difference in toll regimes between WestConnex and the WHT to encourage drivers to cross the harbour in the tunnel, then divert onto the toll-free surface road network. This would result in increased traffic on the City West Link, The Crescent, Johnston Street and several local roads. Consideration should be given to incentivising drivers to continue in the tunnels to the south and west using WestConnex, as this would reduce volumes on the surface road network and minimise the likelihood of rat-running on local streets.

Council's experience with WestConnex Stage 1 is that motorways increase congestion at all key intersections. It is essential that the proponent addresses congestion issues at key intersections affected by WHT traffic as part of the EIS rather than acting later. This is now the case with WestConnex, where TfNSW is acting to address congestion at the intersections of: Parramatta Road with Dalhousie Street; Wattle Street with Waratah Street; Wattle Street with Timbrell Drive; and City West Link with Norton and James Streets.

The WHT EIS is deficient as it does not plan for necessary works at key intersections and does not include a detailed assessment of traffic volumes on local and regional streets. The project should not be approved until this deficiency has been rectified.

In relation to operational traffic, Council recommends:

- Project approval should not be provided until details of the traffic volume increases on the adjacent road network (including local streets) has been provided and the community permitted to provide feedback. Should this feedback include a desire for local area improvement schemes (both traffic and amenity) these should be provided at the proponent's expense.

- The proponent should identify all potential works that will be required in the future as a consequence of completion of the project, e.g. works at key intersections, and the designs should be exhibited and considered with the project prior to approval.
- A tolling regime should be introduced for all private (non-maritime) vehicle harbour crossings aimed at creating a level of comparability between the harbour crossings and WestConnex to ensure:
 - o reduced demand for private car travel
 - o increased attractiveness of public transport
 - o traffic in the WHT to continue on WestConnex tunnels rather than exit to use the toll-free surface roads.

IMPACTS ON ACTIVE TRANSPORT

At a strategic level, because motorways increase traffic and create the need for widening of surrounding roads and intersections they inhibit the movement of pedestrians and cyclists. This has been an ongoing issue for Council in relation to WestConnex – for example, the recent WestConnex Stage 3 Modification has proved that the planned ‘upgrading’ of the intersection at The Crescent and City West Link would significantly inhibit walk/cycle connectivity between North Annandale and parklands at Rozelle Bay. Fortunately the WHT EIS does not propose any specific roadway or intersection changes that would permanently affect active transport connections, but the additional traffic it creates will nonetheless have a negative impact.

Council notes from the EIS that the WHT would not create any substantial new active transport infrastructure in the Inner West Council area. All new active transport infrastructure would be created within council areas north of the harbour, and most of this would be in relation to the Warringah Freeway Upgrade. Council supports all efforts from the northside councils to ensure that construction does not unduly affect existing active transport routes and that new and/or upgraded infrastructure is provided upon completion of the project.

Within the Inner West Council area, the main issue with active transport for this project is to ensure that construction traffic (particularly heavy vehicles) do not compromise safety for pedestrians and cyclists, and walk/cycle routes are not severed or diverted to an unacceptable degree. Council's concerns here are based on its experience with all three stages of WestConnex.

Walk/cycle safety is such an important issue that Council would like to be addressed in detail at EIS stage rather than in construction management plans. The kind of measures that can improve safety include a requirement for the contractor to provide traffic controllers at all locations where vehicles entering construction sites cross footpaths or shared paths. Contractors should also adopt heavy vehicles with cabin designs that have a high degree of visibility of the surrounding road environment.

Every WHT construction site would have some impact on walk/cycle safety and connectivity, but the main concern is with the Victoria Road construction site due to the sheer number of heavy vehicles (mostly spoil trucks) crossing the Victoria Road shared path as they enter and exit at two locations shown in EIS Figure 6-27. It is essential that traffic controllers are permanently located at these two points during all periods of operation of this site.

Impacts like this from WHT are in addition to the already significant impacts on walk/cycle routes along Victoria Road that have been imposed WestConnex Stage 3B. Because of these two projects, the entire shared path along this side of Victoria Road between Darling Street and the Iron Cove Bridge will be dominated by motorway construction sites. Council

notes that since the second section Iron Cove bridge opened, walk cycle traffic along that side of Victoria Road has increased – therefore many pedestrians and cyclists will be affected. Excessively long diversions (even if temporary) should be avoided.

OPERATIONAL AIR QUALITY IMPACTS

Council notes *The Greater Region Sydney Plan (GRSP)* states that “*Future Transport 2056 sets out directions to investigate cost-effective pathways to support net-zero emissions by 2050, including encouraging a shift from private car use to public transport, promoting low-emissions vehicles, and transitioning to a cost-effective, low-emission energy supply*” (p.170). The construction of twin motorway tunnels crossing Sydney Harbour and the upgrade of the Warringah Freeway is at odds with the GRSP. The WHT is also counter to Objective 33 of the GRSP – “*A low-carbon city contributes to net-zero emissions by 2050 and mitigates climate change.*”

At the operational stage, the main issue for Council is traffic growth created by motorways, leading to an inevitable increase in vehicle emissions at both the local and regional scale. This is an issue that has been a particular concern of the community through Council's experience with WestConnex. Council notes that this is also becoming a major community issue in project-affected council areas north of the harbour.

Consistent with Council's position on WestConnex and other motorways, Council has strong concerns about unfiltered emissions from ventilation facilities. Council notes that the three stacks within the RRY site will serve both WestConnex Stage 3B and the WHT. Council continues to argue that, as emissions have a negative health impact at any level, all ventilation facilities must be filtered. Council is also concerned about their visual impact.

The EIS claims that emissions from the WHT vent facilities will add little to existing pollution levels. Notwithstanding, Council continues to object to the absence of stack and in-tunnel filtration, an arrangement that is not world's best practice. It supports the Recommendation 13 from the 2018 Parliamentary Inquiry into WestConnex: *That the NSW Government install, on all current and future motorway tunnels, filtration systems in order to reduce the level of pollutants emitted from ventilation stacks.*

Parents associated with Rozelle Primary School are already concerned about air quality impacts on school children from the operation of the WestConnex's Victoria Road site. For WHT, air quality impacts on the school would be from truck diesel emissions and dust emitted from spoil handling. This is in addition to emissions from existing surface traffic on Victoria Road and future emissions from the WestConnex Victoria Road stack.

Council notes from the EIS that independent experts from the NSW Advisory Committee on Tunnel Air Quality reviewed the methodology of the air quality assessments and concludes that it is sound and represents best practice. The EIS states that due to technology improvements, emissions from vehicles will decline over the next 20 years, whether or not the tunnels are built. Emissions are slightly higher for the 'with tunnels' scenario because they are expected to increase the distances people travel in cars and trucks.

If the tunnels are not built, nitrogen oxide (NOx) emissions are expected to fall by 52% by 2037 and PM2.5 emissions will fall by 21% compared to emissions in 2016. If both tunnels are built, it is predicted that emissions of nitrogen oxide and PM2.5 will fall by 49% and 16% respectively. The declines in emissions are smaller because construction of the tunnels is expected to increase the distances people travel in cars and trucks.

The redistribution of traffic and emission of air pollution through ventilation stacks are

predicted to cause changes in ground-level air pollution concentrations. The EIS shows small increases where local surface feeder roads experience higher traffic volumes, e.g. community receiver location at St Basils Annandale, which is predicted to see an increase in emissions (increase of 2.2% PM2.5). It is a concern to Council that the EIS does not compare these figures to an improved public transport scenario and appears to accept the status quo as being acceptable.

The EIS predicts that the contribution of tunnel ventilation stacks to air pollution is relatively small or negligible compared existing background levels, i.e. traffic on surface roads and other background sources. However, the EIS does not consider this against an improved public transport scenario. Council has repeatedly advocated public transport powered by renewables, which would result in zero emissions.

During construction there is potential for noise, dust and odour including from contaminated soils. The EIS states that Environmental Management Plans (EMPs) will be implemented to manage those risks. However, the lived experience of residents of Haberfield, Ashfield and St Peters shows that even with environmental management measures in place, the impact of prolonged construction activities has a significant impact on the health of local residents.

IMPACTS ON HEALTH

Council insists that WestConnex construction and operational issues are not extended to other parts of the Council area by the WHT. It is acknowledged that the WHT EIS has assessed the cumulative health and other impacts of WHT combined with WestConnex, Sydney Metro West and other major projects in the Rozelle area. However, Council believes the cumulative health impacts have been underestimated.

Council's concerns about the health impacts from the construction and operation of the WHT is based on its experience with WestConnex. Identification of these issues is from the lived experience of Haberfield-Ashfield and St Peters residents affected by WestConnex Stages 1 and 2 from late 2015 to date. The impacts are many and varied, but in particular, obvious ill-health of residents has resulted from incessant noise, dust and sleep deprivation caused by night works.

In commenting on the WestConnex Stage 3 EIS, Council had demanded that all work on inner-urban motorways cease while the NSW Government undertakes a health study on the impacts WestConnex has had on residents of Haberfield, Ashfield and St Peters to date. Council is of the view that valuable lessons need to be learned about these health impacts and how to protect residents from them. It is acknowledged the WHT EIS has assessed all key health impacts, but several of the conclusions from this assessment are in Council's view and under-estimation of what will likely be experienced once construction of WHT is underway.

OTHER GENERAL COMMENTS

Road & footpath occupations & impacts

As has been the case for WestConnex, WHT will likely require occupation of local roads, parks and footways for site investigations, including bore-hole drilling and utility investigations. At this time, Council recommends the following actions be undertaken:

- Council to be informed of all occupations of local roads, parks and footpaths within the Inner West Council area

- night-works to be minimised to the greatest extent possible
- all repair and restoration works on Council roads, footpaths, parks and stormwater infrastructure to be undertaken to a high standard.

Biodiversity impacts

Following is an assessment of biodiversity impacts from Council's Urban Forest & Ecology team:

<i>EIS Section</i>	<i>Item / issue</i>	<i>Recommendation</i>
<i>Chapter 19 Biodiversity</i>		
19.3.1 Terrestrial flora	Yurulbin Park consists of primarily native plantings.	Map on page 19-11 to be updated to show the area as native plantings.
	Inner West Council manages ecological restoration areas, consisting of native vegetation at: Birrung Park, Waterdale Park, Birchgrove Park, Cameron's Cove (Ewenton Park), Mort Bay Park, Vanardi Reserve, Callan Park, King George Park.	Areas of native vegetation adjacent to various sites have not been identified in the BDARI. These need to be considered in the vegetation maps and the indirect impacts on native vegetation and habitat.
19.4.2 Assessment of potential impacts to terrestrial fauna	Light spill impacts	Light spill impacts need to be considered for all potential bat roosting sites.
	Noise and vibration impacts to roosting threatened bats need to be considered in the context of multiple stressors and an	Update proposed monitoring to reflect a precautionary approach to impacts on threatened bat species.
	overall loss of secure roost sites in the Sydney basin.	
19.4.4 Assessment of potential impacts to marine biodiversity	Impacts to seagrass habitat between Yurulbin Park and Sydney Harbour south cofferdam are not acceptable.	Impacts to sea grass must be avoided due to the small size of remaining patches
19.5 Environmental management measures	Table 19-7 Removal of native vegetation	Environmental management measures – removed vegetation must be re-established with local native plants and maintained for a period of 12 months by suitably qualified ecological contractors to ensure the sites are appropriately restored.

	Table 19-7 monitoring of threatened bats – microbats are likely to be foraging in the surrounding areas. Also, Section 5.4.1 of Appendix S BDAR.	Project scheduling must be informed by a bat ecologist to minimise impacts to threatened bats, for example noisiest works near the Coal Loader site should be scheduled for summer when the Eastern and Little Bentwing bats are not present in the Sydney Region. Conduct additional monitoring to understand the distribution of threatened bats in the areas surrounding the construction footprint.
	Table 19-7 Adaptive management measures	Department of Planning, Industry and Environment (Environment, Energy and Science, and the Regions, Industry, Agriculture and Resources divisions), North Sydney Council and an appropriately qualified expert in microbat biology and behaviour must be engaged prior to any works to initiate monitoring before construction commences to enable the identification of changes to bat behaviour. An Eastern Bentwing-bat roost exists in a tunnel in the Inner West Council area which could also be protected as part of an adaptive management strategy.
<i>Appendix S Biodiversity Development Assessment Report - Chapter 4 Avoid and minimise impacts</i>	Locating project to avoid habitat for species that have a high biodiversity risk weighting	The project is located very close to the Eastern Bentwing bat roost site at the Coal Loader, this important roost site has not been adequately considered in the project siting.
<i>Chapter 17 Water</i>		
17.5.3 Surface Water Quality	During operation the project would treat water according to ANZECC water quality guidelines.	Water should be treated to also meet the Sydney Harbour Water Quality Improvement Plan Targets.
17.6 Environmental management measures	Permanent waste water treatment plants	Include WSUD approaches to treating waste water for permanent water treatment, this has added benefit of providing green infrastructure.
<i>Chapter 22 Urban Design</i>		
22.3.4 Night lighting impact assessment	Key receivers have been identified.	Key receivers should include nocturnal native wildlife.

22.7 Environmental Management measures	Where possible, trees will be trimmed rather than removed. Works will be carried out by a qualified arborist	Any tree works must be carried out by an arborist with Australian Qualification Framework level 5 or equivalent in Horticulture (Arboriculture).
<i>Appendix W Arboricultural impact assessment</i>	55 trees are to be directly impacted in Yurulbin Park	Number of trees to be impacted is significant in the local context – consult with Inner West Council Urban Forest and Ecology team to confirm those trees with the highest retention values. Trees need to be replaced with mature plants and must be replaced in a 2 for 1 ratio. Offsets to include the introduction of ecological restoration features, such as the development of a saltmarsh area at Yurulbin Park.

Page-specific general comments

Following are further general comments based on Council's page-by-page review of the EIS.

Executive summary

- p.E3 – Council appreciates the “*transport challenges*” & “*project objectives*” listed, including the problem of congestion on and around the Harbour Bridge due in part to limited crossings. However Council believes traffic reduction solutions are more effective than motorways at meeting these challenges and achieving the project's objectives.
- p.E3 - “*Project benefits*” listed may be achieved in the short term but will be eroded in the long term due to induced traffic. Council believes there are many “*project costs*” of motorways (compared to public transport) that are ignored or underestimated in the strategic justification.
- p.E4 – The role of WHT for improving bus travel is acknowledged, but Council believes that rail is a more effective form of public transport for these congested corridors. Should WHT proceed, bus priority is essential to ensure the long-term viability of bus services.
- p.E13 Fig E8 – Council disagrees that a motorway is the most effective option compared to the alternatives listed.
- p.E17 – Council appreciates there is recognition of the impacts (particularly construction impacts): “*It is inevitable that delivery of a project of this scale within a heavily urbanised environment would have some adverse impacts, particularly during construction.*” However the magnitude of the impacts is underestimated in Council's view.
- p.E17 – The EIS then states: “*These impacts need to be considered within the context of the overall objectives of the project and the significant transportation and other benefits it would provide over the medium to longer term, and for future generations.*” Council disagrees that WHT will provide significant transport & other benefits in the long-term.
- p.E17 – The beneficial outcomes listed could be better achieved through improved

public transport and traffic reduction.

- p.E18 - Council has a long-standing concern about construction traffic impacts from its experience with WestConnex. The mitigation measures outlined below are appreciated, but there will be cumulative impacts from WHT and other projects. Council is of the view that the following EIS statement underestimates the impacts: *"The impacts associated with the increase in heavy vehicles would be minimised through scheduling of haulage and deliveries outside of peak periods (where feasible and reasonable), using construction sites with direct or proximate arterial road access, and through the use of barges to move spoil by water where appropriate."*
- p.E18 - Council also concerned about operational traffic impacts. The EIS states there is: *"Potential for increased local traffic on the local road network in Rozelle and surrounds, as a result of reduced through traffic in the area. An increase in local traffic movements could impact network efficiency and travel times in the area"*. Council is particularly concerned about added traffic on Johnstone Street & The Crescent, and that TfNSW would not reduce road/vehicle capacity on streets where there traffic is reduced from the project.
- p.E18 – The EIS states that *"While some localised impacts are possible, they are expected to be significantly outweighed by travel time and reliability benefits on the broader strategic transport network, resulting in net benefits for the majority of future road transport customers."* Council believes these benefits will only be realised in the short- term - in the long-term they will be eroded by induced traffic.
- p.E18 – Council is relieved that barges will serve the Yurulbin Point construction site instead of road vehicles, but is still concerned about noise impacts from barges.
- p.E18 – As stated in the EIS, it is critical that construction traffic avoids peak periods to the greatest extent possible, as there are already peak traffic congestion and safety issues on City West Link, and there will be other infrastructure projects contributing traffic.
- p.E18 – Although the EIS states that operational traffic benefits will outweigh the costs in the short-term, Council believes that induced traffic will erode the benefits in the long- term.
- p.E19 – It is appreciated that most surface works would be carried out in standard daytime hours, but there will inevitably be some night works, which from Council's experience with WestConnex can have a profound impact. Night works from utilities are a particular concern, and the full extent of utilities works is not known at this stage.
- p.E19 – The EIS appears to downplay vibration impacts from tunnelling. Council's experience with WestConnex is that tunnelling has created widespread vibration impacts on residents.
- p.E20 – Operational traffic noise reductions from WHT are acknowledged, but Council believes these benefits will be eroded by traffic growth in the longer-term.
- p.E20 – Council's experience with WestConnex is that construction dust can have a widespread impact, particularly during dry weather.
- p.E20 – It is noted that odour impacts are not expected, but Council's experience with WestConnex Stage 2 is that odour can have a major impact, i.e. leachate odour from the St Peters Interchange (SPI) site. Council has raised issues about possible odour from dredged harbour sediments.
- p.E20 – It is acknowledged that operational air quality impacts would be small compared to WestConnex and general surface traffic, but air pollution from traffic is a

major issue of concern for the community. Council would prefer high-occupancy public transport powered by renewable sources of electricity to negate emissions altogether.

- p.E21 – Whilst WHT itself may not have major health impacts, Council's main concern is health impacts from general increases in traffic at some surface road locations experiencing traffic increases, and from creation of a stressful car-dependent city.
- p.E21 – Council agrees that traffic congestion needs to be addressed, but again argues the most effective means to do this is traffic reduction, not increasing road capacity.
- p.E22 – Council strongly supports the project's aim to *"improve pedestrian and cyclist accessibility and connectivity of active transport routes, which would bring long-term benefits for community cohesion"* but also recognises that major roads sever walk/cycle connectivity. Council would also like to ensure that promised active transport improvements are actually delivered.
- p.E22 – Council is satisfied that the EIS has acknowledged the heritage impact on Yurulbin Park as *"major"* and is pleased the park will be reinstated with the assistance of its original landscape architect. Council would like its parks staff to be involved in the restoration.
- p.E23 – By stating that there would be no significant terrestrial flora/fauna impacts, Council believes the EIS is understating the impacts. Tree removal has been a major issue with WestConnex, and Council is concerned about marine impacts from WHT.
- p.E23 – Council is concerned about sediment impacts on harbour water quality, noting that there is no guarantee that there will not be breaches of regulations (even if not intended), given Council's experience with WestConnex.
- p.E23 – The goal of minimising acquisitions is supported, but this is also in the project's interest to reduce costs. Council continues to express its strong opposition to the acquisition of the former Balmain Leagues Club site, which would significantly delay the establishment of the club.
- p.E24 – Council is relieved that cumulative impacts are acknowledged and assessed in the EIS, but would like to see a more detailed assessment so the total impacts can be appreciated – in particular, more detail is needed on cumulative construction traffic impacts.
- p.E25 – Regarding management of construction and operational impacts – although the contractor may strive for full compliance, Council has found with WestConnex that even with full compliance there have been unacceptable impacts, along with doubts about whether compliance has been achieved.
- p.E25 – Council acknowledges there have been tangible improvements in community engagement and complaints handling processes as WestConnex has progressed. Council is keen to see this improvement continue, based on the lessons learned from each of the WestConnex stages and other projects. This is not only to minimise impacts on the community, but to reduce the need for Council to take on complaints handling and community advocacy roles as has been the case for WestConnex. Council finds the usual exhibition period for EISs like this to be insufficient. The extension of the WHT EIS exhibition period is appreciated, and Council would like to see similar extensions for all future major infrastructure projects.

Chapter 3: Strategic context & project need

- p.3-2 – Council agrees harbour crossings are critical in this area, but sees the

solution to congestion as traffic reduction.

- p.3-2 – This is a lack of consideration of how traffic reduction through metros and additional rail projects could solve congestion problems in this area.
- p.3-13 – Council believes travel time saving benefits stated for year 2036 will be eroded in the longer-term by induced traffic.
- p.3-13 – Claims that increased road capacity will reduce traffic noise and improve local amenity are disputed.
- p.3-16 – WHT creating “*faster, more reliable journeys*” is claimed as a benefit, but this will lead to mode shifting and induced traffic which will ultimately erode this benefit. Council finds that widening of roads and intersections around motorways leads to slower and less reliable journeys for pedestrians and cyclists.
- p.3-16 – Council is concerned about traffic impacts on Rozelle residents and lack of vehicle travel time benefits – in fact, the project will increase traffic in Rozelle which will increase travel times, i.e. “*some slight increases in travel times would be observed for commutes starting in Rozelle due to an overall increase in travel demand through the Rozelle area (of up to 40 per cent by 2037).*”
- p.3-18 Fig 3-10 – Shows most of the travel time savings are in the North Shore and Northern Beaches areas, with less savings in the Inner West. This highlights Council's concern that the project will do little to improve transport access for Inner West residents.
- p.3-20 Fig 3-11 – shows increase in jobs accessed within 30 minutes because of the project. The benefits of this increase would likely be reduced if parking was considered. A public transport alternative may have likely resulted in bigger increases, particularly as parking would not be a consideration.
- p.3-22 – In dealing with WestConnex, Council has repeatedly pointed out that motorways act against to place-making and quality urban design. They tend to disperse development and create neglected left-over spaces blighted by fast moving traffic. In contrast, public transport consolidates development and creates vibrant human-scale places.
- p.3-22 – Whilst there will undoubtedly be some place-making benefits from motorways in the Inner West, such as the RRY recreation area and the upgrade of Yurulbin Park, Council would prefer these occurred with improved public transport rather than a motorway.
- p.3-23 - Table 3-2– Council would argue that the goals of all these plans listed in the strategic planning and policy framework would be better served by public transport rather than motorway options.

Chapter 4: Project development & alternatives

- p.4-1 – in dealing with WestConnex, Council has repeatedly stated that the alternatives have not been genuinely considered. It appears the decision for a motorway was taken at the very start of the process and all planning document crafted to justify this decision.
- p.4-5 Fig 4-2 Historical context - the need to continue to provide more private vehicle capacity is the result of decisions over decades that have favoured private vehicles. Responsible transport planning should be attempting to redress this imbalance by favouring public transport.
- p.4-7 – The EIS states that “*to have a major impact on road traffic, travel demand management measures would require considerable changes in social attitudes, travel*

behaviour and government policy and can take many years to achieve.” Council believes a change in social attitudes, behaviour and government policy away from private vehicles toward public transport is urgently needed. Governments at all levels should lead the way by implementing strong demand management policies whilst improving and expanding Sydney’s public transport network. This needs to begin now to create a virtuous cycle of change that reduces traffic into the future.

- p.4-7 – Council disputes the statement that *“an expanded road network would be required to accommodate this population growth, even with significantly reduced per-capita travel demand through demand management.”* Council believes that by focusing on public transport, transit-oriented development and travel demand management, the road network does not need to be significantly expanded. There are numerous examples where cities around the world that have taken this approach and are realising the benefits. Council supports some modest/targeted road network improvements, but not motorways.
- p.4-9 Fig 4-3 - The NSW Government’s current program of improvements to public transport is in general terms appreciated and supported. Council would however like to see all inner-Sydney motorway funding be redirected to further public transport improvements.
- p.4-11 – The potential for this project to accommodate bus travel is recognised and appreciated, but Council would prefer heavy rail for all inner-Sydney transport infrastructure projects of this magnitude by way of a rail route option that is a genuine alternative to the Metro projects under construction. Should the WHT proceed, Council would like to see an early commitment to dedicated (bus-only) lanes within the project.
- p.4-12 – Council would like to see a more detailed analysis of increasing the walking, cycling and ferry mode share as a means of reducing demand traffic in this area. It is recognised that these improvements alone won’t resolve traffic congestion, but in combination with public transport improvements and demand management they can play a significant role. When the health and liveability benefits of these modes are also taken into account, they assume even greater significance.
- p.4-13 - Council disputes the statement about the motorway option being preferred after consideration of all strategic alternative. As was the case for WestConnex, it appears the NSW Government has made an early decision to pursue the motorway option, with alternatives receiving little attention.
- p.4-25 – It is noted that favourable tunnelling conditions are expected north and south of Sydney Harbour, with the majority of the tunnel alignment expected to be constructed in *“high-quality Hawkesbury Sandstone”*. Notwithstanding, WestConnex tunnelling has created vibration impacts and has raised concerns about property damage from ground settlement. This is particularly the case where tunnels are at shallow depths – for WHT, these areas would be around Easton Park in Rozelle and at Yurulbin Point in Birchgrove.
- p.4-41 – It is noted that the proposed ventilation outlet in Rozelle would be located within the Rozelle Interchange site alongside the M4-M5 Link ventilation facility. This has been known previously, and Council’s concerns about this ventilation facility have been raised in its submission on WestConnex Stage 3 EIS and WHT *Reference Design*. The community has raised concerns about emissions affecting surrounding Lilyfield and Rozelle, including two primary schools in Rozelle.
- p.4-43 – Council acknowledges that public transport infrastructure projects create construction impacts, but these impacts are generally less given tunnelling is by way of automated TBMs rather than road headers. In addition, the community would likely be more willing to endure the impacts knowing it was for a project that

brought long-term benefits for to neighbourhoods and the city as a whole.

- p.4.44 – Council is relieved that most spoil haulage will use main (State) roads, but this does not mean impacts will be low, particularly as there are already congestion, road safety and other issues with City West Link and Victoria Road. Safety of children and parents crossing these roads is a particular concern.
- p.4-45 – Barge is preferred to road. At Yurulbin Point, this would mitigate the need for any spoil haulage on roads through Birchgrove and Balmain. However, there would still be noise impacts for residents from the operation of barges on the harbour.

Chapter 6: Construction work

- p.6-5 – The four to five year construction period will mean construction impacts will seem permanent, not temporary. For some residents, the WHT impacts will be in addition to impacts from WestConnex and other projects.
- p.6-8 – access tunnel at Yurulbin Point – *“a vertical access shaft would be required at the Yurulbin Point construction support site (WHT4), and would be constructed within a purpose-built acoustic shed. Excavation of the shaft would be carried out by excavators and rock hammers, with spoil removed using excavators and cranes.”* Council is concerned about the noise and vibration impact of pile driving on nearby residents.
- p.6-10 – Excavated access declines would be required at the Victoria Road construction site. Council is concerned about vibration impacts on surrounding residents as access tunnel will be shallow at this point. It is noted that the access declines will be backfilled at completion of construction, allowing the site to be redeveloped.
- p.6-13 – *“controlled underground blasting may also be used to improve the efficiency of excavation activities and shorten the overall excavation program. Areas likely to require controlled blasting would be confirmed during detailed construction planning.”* This is likely to have an impact on residents, so further detail is needed.
- p.6-17 - Figure 6-11 shows the indicative construction sequence for the immersed tube tunnels. Council is concerned about the inherent construction risks, construction noise and permanent impacts on marine life.
- p.6-22 – *“The immersed tube tunnel would be about 630 metres long and would consist of five individual units fabricated at the White Bay construction support site (WHT3).”* Concerned about construction noise affecting residents next to White Bay, including cumulative impacts from other White Bay activities.
- p.6-40 – *“Construction works at the Rozelle Rail Yards construction support site may overlap with construction of the approved M4-M5 Link, which uses part of the Rozelle Rail Yards. Should this occur, construction works for the project at this location would be carried out in coordination with the construction contractors of the approved M4-M5 Link to ensure all interfaces are effectively managed, including the construction and operation of M4-M5 Link operational infrastructure.”* Notwithstanding this reassurance about co-ordination between the two projects, Council is concerned about cumulative impacts, particularly as residents near the RRY site will already have endured years of impacts from WestConnex.

Chapter 7: Stakeholder & community engagement

- p.7-12 – It is reassuring that there has already been consultation with utility providers. Council understands the importance of impacts from utility works and sees the need for careful co-ordination and understanding of cumulative impacts from multiple utility

works.

- p.7-19 - Table 7-7 – In the summary of stakeholder and community feedback it is apparent that most of Council's issues with WHT have also been raised by the community, including cumulative impacts. The EIS response is that *"Multi-party engagement and cooperation would be established prior to construction to ensure all contributors to impacts are working together to minimise adverse impacts or enhance benefits of multiple projects occurring concurrently or consecutively. Potential cumulative construction impacts are assessed and considered in Chapter 27 (Cumulative impacts)."* Council has been reassured that an EIS chapter has been devoted to assessing this important issue.
- p.7-52 Council is pleased that the EIS has assessed the issue of construction fatigue. This is an important issue for Council and the Inner West community based on the experience with WestConnex.
- p.7-52 A further important issue is managing complaint fatigue, and it is reassuring to see that this has been acknowledged and assessed in the EIS.

Chapter 8 – Construction traffic & transport

- p.8-8 Figure 8-3 shows 2016 PM peak travel times and average speeds along key corridors. Slow average vehicle travel speeds are not necessarily negative as fast traffic creates safety and liveability impacts and increases sprawl. Consistency of speed should also be considered.
- p.8-9 Table 8-5 shows existing peak hour traffic volumes for Rozelle and surrounds. Freight as % of all existing traffic is minor (around 5%), so motorways can't be justified primarily on moving freight more efficiently and reducing freight impacts. Increasing capacity will increase general traffic which will eventually slow freight movement. The most effective way to move road freight more efficiently is to reduce general traffic.
- p.8-15 Table 8-8 shows marinas, boat ramps and dry dock facilities within Sydney Harbour. It highlights the fact that WHT barge activity will at different times affect a large number of activities on the harbour.
- p.8-31 Table 8-13 shows modelled intersection performance in Rozelle and surrounds for AM peak (8am-9am) and PM peak (5pm-6pm) during construction in 2022. WHT construction traffic would not make a significant difference to general traffic levels, but cumulative impacts from WHT & other projects would add up to a significant increase. It should also be noted that trucks have a significantly greater impact on traffic flow because of their size and slow acceleration.
- p.8-33 Council has previously expressed its concern about the impacts of WHT construction on bus services. The EIS confirms this by stating that *"project construction would result in additional construction vehicles travelling on the road network around Rozelle which could increase bus travel times given the congested nature of networks in these areas."*
- p.8-33 – discusses impacts on active transport. In the body of the submission, Council has raised issues about pedestrian safety of signalised crossings at Darling & Wellington Streets in Rozelle due to spoil truck movements. It is imperative that the traffic signal changes proposed in the EIS prioritise pedestrian safety. In this matter, the EIS states: *"potential impacts on the active transport network during construction are summarised in Figure 8-9. The shared user paths on Victoria Road within the vicinity of the Victoria Road construction support site (WHT2) would be maintained throughout construction. Construction vehicles entering and exiting the site would give way to pedestrians and cyclists using the shared user path on the*

western side of Victoria Road. This would be facilitated through the modification of the traffic signals at the Victoria Road/Wellington Street intersection with a new south approach for construction vehicles, and controlled pedestrian and cyclist crossings across the site exit.”

- p.8-35 – discusses maritime movements & activities: “The construction vessels would primarily include: • Construction barges (including barges with cranes) for delivering material and removing tunnel spoil and dredged material, or for other construction activities • Tugboats for manoeuvring barges and • Transport vessels for workers”. This highlights the fact that the project will contribute to boat congestion on the harbour.
- p.8-58 – Council is reassured that “a cumulative traffic working group was established in July 2018 to investigate the potential cumulative traffic impacts associated with the concurrent traffic generating activities in the Glebe Island and White Bay area due to construction of the Rozelle Interchange, Western Harbour Tunnel and Sydney Metro West, along with an expansion of existing operations at Glebe Island by the Port Authority of NSW.” Council would like to be represented on this working group.
- p.8-58 – Council is pleased that construction travel mitigation measures have been investigated, including: “• Implementation and incentivising bus services to transport suitable project personnel to and from site • Avoiding tunnelling shift changeovers occurring between 7am and 9am and 4pm and 6pm Monday to Friday, to reduce peak period traffic impacts and • Offshore disposal of tunnel spoil, which is primarily crushed sandstone, when generated at harbourside construction support sites to reduce heavy haulage.”
- p.8-59 – Given current congestion issues on City West Link and Victoria Road, Council is not reassured by EIS modelled construction traffic impacts which show “cumulative project impacts could result in: • travel times on City West Link westbound slowed by up to five minutes during AM peaks; • travel times on Victoria Road northbound slowed by up to 3.5 minutes during AM peaks; and • travel times in the PM peak slowed by up to two minutes on City West Link and Victoria Road.”
- p.8-60 – It is reassuring that the EIS has recognised the impacts of WHT construction on special events, even though no alternative venues are suggested: “Yurulbin Park – A popular vantage point for New Year’s Eve celebrations on Sydney Harbour. After 3pm on New Year’s Eve, access to Birchgrove peninsula from Victoria Road is restricted to residents, buses, taxis and authorised vehicles. The closure of the park during construction would require members of the public to seek alternative vantage points, potentially increasing pressure at other locations. Barge movements generated at the Yurulbin Point construction support site (WHT4) would be scheduled to avoid conflict with New Year’s Eve celebrations.”

Chapter 9: Operational traffic & transport

- p.9-10 – Council believes modelling of scenarios is flawed as it doesn’t link to traffic reduction from public transport and demand management - in particular, weekday peak spreading.
- p.9-12 – In considering road network performance for Rozelle & surrounds, Council is concerned about the 14% or more increase in traffic through Rozelle.
- p.9-15 - Table 9-6 Modelled intersection performance on Rozelle and surrounds area (AM peak (8am–9am) and PM peak (5pm–6pm) during operation in 2027 and 2037) shows minor improvements only as a result of the project.
- p. 9-17 – The EIS states that for operational impacts on active transport, “There would be no direct impacts on the active transport network within Rozelle and surrounds.”

Council would like to see a substantial positive impact, which would not only have local transport & amenity benefits but also wider traffic reduction benefits.

Chapter 10: Construction noise & vibration

- p.10-8 – 10-15 - Noise catchment & monitoring maps show that many properties will be potentially affected.
- p.10-28 Table 10-8 shows sensitive receiver buildings potentially affected by ground-borne noise from roadheader and rock-hammer tunnelling. It is disputed that no properties will be affected in Rozelle area by road header tunnelling. Rock hammer tunnelling will affect many properties in Inner West, particularly Balmain & Birchgrove.
- p.10-31 Table 10-9 shows the number of receiver buildings exceeding construction vibration screening criteria from mainline tunnel construction. Many of these are in Birchgrove (87 properties).
- p.10-36 Table 10-10 shows number of residential receiver buildings over the noise management levels during construction at Victoria Road (reasonable worst case noise intensity scenario). This shows the airborne noise from WHT construction will affect a substantial number of properties at all stages.
- p.10-39 Table 10-11 Shows the number of receiver buildings within minimum working distances for vibration intensive work for the Victoria Road construction support site. It shows a moderate number of properties affected by vibration.
- p.10-41 Table 10-12 shows the number of residential receiver buildings over the noise management levels during construction at White Bay for the reasonable worst-case noise intensity scenario. It shows a moderate number of properties affected by noise, particularly at the site establishment stage.
- p.10-45 Table 10-14 shows the number of residential receiver buildings over the noise management levels during construction at Yurulbin Point for the reasonable worst case noise intensity scenario. It shows many properties will be affected, especially for site establishment and piling for acoustic sheds.
- p.10-48 Table 10-15 shows number of receiver buildings within minimum working distances for vibration intensive work for the Yurulbin Point construction support site. Council notes four heritage buildings would be potentially affected.
- p.10-50 Table 10-16 shows the number of residential receiver buildings receiving greater than the noise management levels during construction at Sydney Harbour for the reasonable worst case noise intensity scenario. Many properties (600) fall into this category affected on both sides of the harbour. Six properties would be highly affected.
- p.10-53 Table 10-17 shows the number of receiver buildings within minimum working distances for vibration intensive work for the Sydney Harbour cofferdam construction support sites. 14 properties would be affected, i.e. are within the minimum distance.

Chapter 16: Geology, soils & groundwater

- p.16-28 – Damage to buildings as a result of tunnelling and ground movement continues to be a major community concern from WestConnex. It is not reassuring to Council that the EIS verifies that *“Ground movement may occur as a result of: • Tunnel induced movement caused by the relief of stress from tunnelling through intact rock • Settlement induced from groundwater drawdown. The risk to individual structures would be dependent on the geotechnical conditions, the depth of the*

tunnel, the number of storeys of the building, and the position, condition, and masonry of the structure itself.

- p. 16-29 Table 16-8 shows maximum predicted surface settlement from Rozelle ventilation tunnels as being 10-15mm and the Victoria Road access decline as 25-30mm. The 'slight' category is 10-50mm. The impacts are described as: *"Cracks easily filled. Redecoration probably required. Recurrent cracks can be masked by suitable linings. Cracks may be visible externally and some repointing may be required to ensure weather tightness. Doors and windows may stick slightly. Typical crack widths between one to five millimetres."* Even the 'slight' category represents extensive damage given the number of properties potentially affected.
- p.16-33 – describes land contamination areas of interest: RRY site, Easton Park, Birchgrove Peninsula & Sydney Harbour. These are described as moderate to high risk sites, mainly from past filling and industrial uses. Impacts include leachate. Disturbing these sites has the potential to affect surrounding residential areas.

Chapter 21: Socio-economics

- p.21-6 – Council has been aware for some time that business communities in the Balmain and Rozelle area are concerned about impacts on business viability from the multiple infrastructure projects in the area, including WHT. Council is pleased that an analysis of the impacts of WHT on businesses has been undertaken in the EIS.
- p.21-22 Table 21-4 summarises the businesses within the business centres examined. For the south side of harbour, these centres include: Catherine Street Centre, Lilyfield; Victoria Road/Darling Street Centre, Rozelle; Robert Street Industrial Centre, Rozelle; James Craig Road Working Waterfront, Rozelle; and the Chapman Road Working Waterfront.
- p.21-29 It is interesting for Council to note the EIS's description of community concerns about risks of property damage: *"Concerns were raised during community and stakeholder engagement about potential for property damage, including to basement car parks, unit developments and pools, due to vibration from tunnelling activities ... The excavation of tunnels also has potential to result in settlement at the ground surface, potentially impacting properties above or near the project. Some properties near the project may experience very slight to slight cosmetic damage due to settlement, although this is not expected to impact on the serviceability or stability of buildings ..."*
- p.21-34 Council has already raised concerns about impacts on schools and other sensitive uses. The EIS describes this impact as follows: *"A number of schools and childcare facilities would be located near the project (refer Figure 21-3, Figure 21-4 and Figure 21-8 to Figure 21-11). Students, teachers and visitors at the schools may experience temporary amenity impacts due to increased noise and dust from construction activities at construction support sites and surface road upgrades. Construction activities at the Victoria Road construction support site (WHT2) at Rozelle would have the potential to impact on the amenity of nearby social infrastructure such as Rozelle Public School. During construction there is potential to affect the use of outdoor areas along Victoria Road."*
- p.21-39 – Council notes with interest the EIS's assessment of how altered walk/cycle flows would affect business patronage, but does not agree with the conclusion that *"Generally the impact of construction on the visibility of business would be positive."*

Chapter 22: Urban design & visual amenity

- p.22-3 Table 22-2 lists the project's urban design objectives. Council supports all

these objectives, but would argue that most would be undermined by motorways and enhanced by public transport.

- p.22-32 – Council agrees with the EIS that WHT construction would have a negative visual impact on the Rozelle / Birchgrove area, but does not agree with the EIS that these impacts would not be significant, particularly when considered in combination with WestConnex.

Chapter 23: Hazards & risks

- p.23-14 – Although the EIS's preliminary ground movement assessment concludes that impacts would be 'slight' in all cases, the sheer number of properties affected is still a concern.
- p.23-20 – Council notes in the EIS that *"the transport of dangerous goods in prohibited areas, including the mainline tunnels, would be prohibited. Signage would be provided near tunnel entry portals advising of applicable restrictions to ensure compliance with Regulation 300-2"*.
- Council is concerned that there is no mention in this chapter of the risks involved in construction of the two cofferdams within the harbour.

Chapter 24: Resource use & waste management

- p.24-16 – Council is pleased the project design has taken into account the principles of the resource management hierarchy as defined in the Waste Avoidance and Resource Recovery Act 2001 and as described in EIS Section 24.1.

Chapter 25: Sustainability

- p.25-4 – Council notes that EIS Table 25-2 shows key legislation, policies and guidelines for this project, including the *Transport Environment and Sustainability Policy Framework and Statement* (TfNSW 2015). This statement *provides a collective and coordinated approach to deliver the NSW Government's environmental and sustainability agenda across the transport network. The framework outlines the commitment of Transport for NSW and key transport agencies to deliver transport projects and services in a manner that balances economic, environmental and social issues.* This is supported, but Council is of the view that motorways themselves represent unsustainable development and facilitate further unsustainable development.
- p.25-7 The vision and policies for the project are sound, but Council believes these could be more effectively achieved with public transport.
- p.25-11 Table 25-5 shows application of the principles of ecologically sustainable development to the project. Again, Council would argue that compliance with these principles would be more effectively achieved with public transport. The focus of the EIS's sustainability assessment is on the project itself. This assessment should have been undertaken for motorways vs public transport long before the choice of transport option had been made.

Chapter 26: Climate change risk & greenhouse gas

- p.26-1 – Table 26-1 shows the secretary's environmental assessment requirements for climate change risk. As was the case for WestConnex, the proponent has only been required to assess the impact of climate change on the project, not the project impact on climate change. Council believes that by creating additional traffic and sprawling development, motorways increase per-capita emissions and increase climate change risks.

Chapter 27: Cumulative impacts

- Council has been concerned about cumulative impacts for some time and is pleased this chapter has been included, as required by SEARs.
- p.27-23 Describes areas considered most likely to experience sustained impacts to receivers that may result in construction fatigue. This would appear to be an accurate assessment in Council's view. Relevant areas *"include residential receivers in the vicinity of the Rozelle Rail Yards, White Bay and Glebe Island, commercial receivers in the North Sydney CBD, residential receivers in Cammeray, and regular users of the Warringah Freeway. Construction fatigue in the above areas may occur as a result of the close proximity of multiple construction sites for the project, and from construction activities associated with the following projects: • Rozelle and White Bay • M4-M5 Link - Sydney Metro West - Sydney Metro City & Southwest (White Bay truck marshalling yard) • Glebe Island concrete batching plant - Glebe Island Multi-User Facility - The new Sydney Fish Market"*.
- p.27-26 – Council notes with interest EIS Table 27-10 Environmental management measures for cumulative impacts. Council supports the measures proposed, which includes: *"Considered and tailored multi-party engagement and cooperation will be established prior to construction to ensure all contributors to impacts are working together to minimise adverse impacts or enhance benefits of multiple projects occurring concurrently or consecutively. Haulage routes and road occupancy will be coordinated with other major transport projects via the Sydney Coordination Office."*

Chapter 28: Synthesis of the EIS

- p.28-2 gives an overview of project need. Again, Council believes traffic reduction / public transport options are a more effective means of addressing congestion.
- p.28-9 Council notes the EIS statement about changes to the project's design: *"As with any project of the nature and scale of this project, the project design presented in this environmental impact statement would continue to be refined during further design development."* This is understood and accepted, but changes should not be so significant as to create unforeseen negative impacts or a general lack of trust in the community that the project will proceed as approved.
- p.28-10 In general terms, Council supports the following objectives in relation to project changes, particularly reducing impacts from utility works (the first point). *"Areas where further work would be carried out to optimise the design outcomes and construction method include refinements to: • Avoid services and utilities that present significant construction difficulties in terms of logistics, time and/or cost • Reduce the duration of construction • Avoid areas of environmental sensitivity • Reduce impacts on the community during construction and/or operation • Improve operation of the project without increasing the potential environmental impacts."*
- p.28-17 Table 28-3 includes a summary of key project impacts and environmental management measures – key items - Traffic and transport, Noise and vibration, Human health and air quality, Land use and property, Urban design and visual amenity, Geology, soils and groundwater, Socio-economic, Cumulative impacts. These are generally consistent with the issues raised by Council in this submission.
- p.28-35 – Based on Council's above arguments about the strategic need for this project, it disagrees with the EIS's final conclusion: *"The merits of the project were considered in the context of a range of other alternatives including do-nothing, based on the extent to which they could meet the project objectives and how well they performed with reference to other transport, environmental, engineering, social and*

economic factors. No other alternative would satisfy the need and objectives as effectively as the project.”

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