



25 February 2020

Mr Ted Plummer
Special Advisor – Government & Community Relations
Sydney Airport
Locked Bag 500
Sydney International Airport NSW 2020

Attn: Ted Plummer

Email: sydneygateway@syd.com.au

Dear Mr Plummer

Re: Submission on the Sydney Gateway Road Project Draft Major Development Plan

Thank you for the opportunity to make a submission and provide feedback on the Sydney Gateway Draft Major Development Plan. In response SSROC provides the following comments, noting that the project will continue to be subject to on-going discussions between local member councils and representatives of both the Sydney Gateway Team (of TfNSW) and Sydney Airport.

In particular, we want to note our thanks for agreeing to our request for an extension to 25 February 2020, for SSROC to make this submission.

The Southern Sydney Regional Organisation of Councils Inc (SSROC) is an association of eleven local councils in the area south of Sydney Harbour, covering central, inner west, eastern and southern Sydney. SSROC provides a forum for the exchange of ideas between our member councils, and an interface between governments, other councils and key bodies on issues of common interest. Together, our member councils cover a population of about 1.7 million, one third of the population of Sydney.

SSROC welcomes the opportunity to provide comment on the draft Major Development Plan Papers to help identify ways to balance the needs motorists and commuters with those of local communities, their councils and other stakeholders. SSROC seeks to advocate for the needs of our member councils and bring a regional perspective to the issues at hand.

General Comments

- While SSROC has number of concerns with the location of urban motorways, and in particular the WestConnex, it acknowledges the project is proceeding despite considerable opposition from the Inner West community and Inner West Council.
- SSROC welcomes, however, that the Sydney Gateway Motorway Project (the Project) will provide benefits to the local area by encouraging WestConnex traffic to remain on the motorway rather than filter through adjacent streets. With around 3.2 million vehicle movements being generated each month by the airport (Sydney Airport report 2018) and passenger numbers forecast to increase by 51% in the next 20 years, the intention to achieve improvements in travel time, traffic congestion and safety for passenger vehicles, freight and bus services in and around the airport is supported. At the same time the Project needs to avoid generating negative impacts on the utilisation of public transport and active transport options.
- Additionally, longer term benefits have been identified for access to Sydney Airport and Port Botany. SSROC notes that in the Greater Sydney Region Plan notes that WestConnex and Sydney Gateway in the Eastern City District aims to better connect Port Botany and the freight precincts in Western Sydney and improve east-west motorway access for Greater Sydney and the District to Sydney Airport.

In accord with these regional and local considerations, should the Sydney Gateway Motorway Project proceed, SSROC requests that the following issues be further considered and addressed:

1. Transport, traffic and infrastructure

- **Limited scope of traffic and transport assessment area** – the scope of the study area included in the EIS is unduly limited. It is considered that limiting the western/north-western border of the study area to the T3/T8 Railway line means that traffic impacts on the Inner West LGA have only gained minimal consideration, including impacts during the construction period.

Recommendation 1.1

That the study area be expanded to include, as a minimum, the three inner west crossing points of the T3/T8 heavy rail line:

- Edgeware Road (Bedwin Bridge);
 - Gleeson Avenue (Sydenham Station);
 - Richardson Crescent (Tempe Station).
- **Enhanced public transport to Sydney Airport** – The Sydney Gateway Motorway Project focuses on the provision of motor vehicle access to Sydney Airport and Port Botany. It also aims to improve rail freight access to Port Botany through its

association with the Botany Rail Duplication Project. It is, however, important that the Project does not induce additional traffic to shift modes from rail. The Project, does not fully capitalise on its ability to enhance public transport access to Sydney Airport through:

- Provision of bus lanes and other bus priority measures;
- Removal of disincentives such as station access fees for the Airport Link heavy rail line.

Recommendation 1.2

The Project provide the significant public transport improvements as proposed above.

- **Access between terminals** - concern is raised about maintaining good access between the Sydney Airport's terminals, particularly in relation to public and active transport. The proposed removal of Airport Drive will necessitate a diversion to Sydney Gateway in order to move between Sydney Airports T1 and T2/T3 complexes. This diversion will apply to the existing bus service, as well as parking shuttles, pedestrians, cyclists and motorists.

Recommendation 1.3

The Project design be reviewed to enhance access between the airport terminals.

- **Design and sustainability of infrastructure** - particular attention should be paid to the detail design of key structural elements such as the motorway overpasses/flyovers. The Project has the opportunity to pursue high levels of design excellence. Consideration should be given to opportunities to capitalise on any traffic reductions along the Princes Highway, that may result from the establishment of Sydney Gateway, particularly noting opportunities for enhancing the public domain, sustainable transport and place making.
- Infrastructure included in the Project should be based on Ecologically Sustainable Development principles and include water sensitive urban design, ecological restoration, using endemic species from the Cooks River Valley, mitigation of the urban heat island effect, and zero or low emission development and operation. The Project and its infrastructure should aim to make a positive contribution to the area in the form of water quality improvements, ecosystem services and infrastructure designed as habitat.

Recommendation 1.4

The Proponent should provide enhanced responses, and management measures for the above issues.

- **Lighting (construction and operations)** - extra care should be taken regarding lighting for both construction and operational phases of the Project, to ensure that it does not negatively impact on:

- aircraft operations;
- residential properties;
- environmentally sensitive areas.

Recommendation 1.5

Lighting design and configuration should address the above concerns.

2. Active transport

- The Project needs to include an integrated active transport network providing connectivity both through the area and to any relevant facilities that may be created as a result of the Project.
- The magnitude of the Project has potential to create a significant physical and psychological barrier discouraging use of active transport through the site and to new facilities that may be created adjacent to the motorway (e.g. possible sporting facilities on residual land). Care should be taken during detailed planning and design to ensure the safety, legibility and user-friendliness of all active transport links in and around the Project.
- The following are highlighted for consideration in the proposed active transport plan. Enhanced active transport connectivity created by the Project should include:
 - an active transport link along the northern alignment of Alexandra Canal.
 - connection between the St Peters Interchange and the Alexandra Canal Cycleway - noting that the Pedestrian and Cycle Implementation Strategy identifies the active transport gap between the St Peters Interchange and Sydney Airport. These links should ultimately provide access to both Sydney Park and the City of Sydney's bicycle network.
 - a direct crossing of Cooks River to the south of the Project site.
 - direct connections from the Alexandra Canal Cycleway to Sydney Airport Terminals T1, T2, T3 and beyond to the Bayside Council and City of Sydney cycleway networks.
 - a direct east-west connection between Coward St, Mascot and Sydenham/Tempe Stations.
 - cycleways and paths to provide access from Tempe and Sydney Airport to any new facilities created by the Project.
- The two active transport links proposed in the EIS are supported, however concern is expressed that these two links do not provide sufficient connectivity to the surrounding active transport network. The canal path needs to provide safety and amenity for people walking and cycling with the installation of lighting, landscaping and CCTV.

- Pedestrian crossings to be provided on all approaches of all proposed signalised intersections as specified by the TfNSW Traffic Signal Design guide to avoid unacceptably long time and distance costs for pedestrians.
- Pedestrian crossings to be provided on approaches of all proposed signalised intersections as specified by the TfNSW Traffic Signal Design guide.

Recommendation 2.1

The proponent ensure the Project's Active Transport Plan is prepared in consultation with the adjacent Councils, the local community and local bicycle user groups to ensure the construction and operation issues noted above are addressed. These issues include enhanced connectivity and design of the planned cycleways and paths, additional links and improved staging of construction.

3 Industrial Lands

- The Sydney Gateway Motorway Project will cause a significant loss of industrial land.
- The Greater Sydney Region Plan (Region Plan) and Eastern City District Plan (District Plan) includes the objective of retaining and managing existing industrial and urban services land in the Eastern City District.
- There is strong competition for land in the Eastern City District from non-urban services industries seeking the proximity to the Sydney CBD, Sydney Airport and Port Botany. Industrial and urban services land in this District is highly constrained due to competing pressures, such as residential and large retail development, and the lack of opportunities for new supply.
- This means all existing industrial and urban services land must be safeguarded for economic and employment purposes to achieve a mix of economic outcomes.
- The EIS gives insufficient consideration of Objective 23 of the Region Plan and Planning Priority 12 of the District Plan in relation to the 'retain and manage' objective and that the impacts on existing industrial land in proximity to the 'trade gateway' need to be acknowledged.
- The absence of any assessment relating to the Project's impacts on the industrial lands, including those to be returned to Council (under the Proposed Acquisition Notice) need to be addressed.
- Any land returned to Inner West Council should be in a useable form with self-sufficient access and easement rights, and that any future design amendments to the Project should minimise the permanent acquisition of industrial land.

Recommendation 3.1

- The EIS and MDP should consider the Project's impacts in relation to the 'retain and manage' objective of industrial land under the Eastern City District Plan, particularly in the context of the Inner West LGA.
- Any future design amendments to the Project must minimise permanent acquisition of industrial land.

4. Noise and vibration

- The EIS noise assessment focuses on residential receivers and does not include sufficient consideration of users of Tempe Reserve park, playing fields, wetlands or other elements of the reserve. Nor does the assessment consider future users of the residual lands.
- It is acknowledged that further noise attenuation measures will be proposed to manage noise and it is requested that particular care should be taken to protect Tempe residents from noise that exceeds agreed levels.

Recommendations 4.1

- Noise monitoring stations should be established;
- Improved noise attenuation should be provided as noted above;
- Further assessment of noise and vibration impacts on open space and residual lands should be carried out.

5 Urban ecology, biodiversity and environmental amenity

In addition to the various urban ecology and biodiversity issues raised in the EIS, the following should be considered and addressed:

- Any loss of vegetation be replaced as soon as the replacement site is available in a mutually agreed form and location with Council and the proponent. The saltmarsh community on the naturalised section of Alexandra Canal, at Tempe Reserve, adjoining the Project site should be given special attention.
- Construction should be managed to ensure that there is minimal disturbance to the Grey-headed flying fox flyways and to ensure light spill does not disturb them.
- Inner West Council's microbat monitoring programs have found that several species of microbats forage in areas along the Cooks River. Care should be taken to ensure microbats are not disturbed, both during construction and operation of the Project.
- Fragmentation of habitats is a significant issue, and it is essential that any vegetation lost should be replaced once construction in that area has ceased and not wait until the overall Project has been completed.

- There is a possibility of contaminated runoff (or sub-surface water) reaching Tempe Wetlands. Stormwater management and control must aim to achieve BBWQIP targets and for stormwater to be treated appropriately.
- The Project include measures to mitigate noise and light spill, through buffer plantings, light fittings and warmer spectrum lights.
- Sydney Airport lands - Some of these areas have been identified in the SSROC Biodiversity Corridors Mapping as Priority Habitat. It is important to note that non-native vegetation can provide important habitat and act as 'stepping stones' for wildlife movement in urban areas. Replacement habitat should be created in the Project area. Impacts on both non-native and native vegetation needs to be minimised to ensure that impact on all habitats are similarly minimised;
- Heat island implications – the heat island impact of a surface motorway of between 8 and 10 lanes is significant and appropriate measures should be taken to minimise these impacts through extensive use of planting and water sensitive urban design, and the introduction of tree coverage/canopies, acoustic barriers that also reduce heat absorption.
- Specific consideration should be given to:
 - Key fish habitats;
 - Grey-headed flying fox and micro-bats habitats and flyways;
 - Green and Golden Bell Frog habitats;
 - Migrating and threatened bird habitats;
 - Key vegetation communities.

Connected Corridors for Biodiversity includes mapping of areas of significance for biodiversity, and opportunities for biodiversity corridor connections, can be accessed at:

<https://www.arcgis.com/apps/webappviewer/index.html?id=3afa804b96ac4d69a74e9b1ed9780328> Councils are seeking to build up this network over time.

Recommendations 5.1

- Prior to approval of the Project the concerns raised in the section above should be addressed to the satisfaction of the Inner West Council.
- Connected Corridors for Biodiversity should be taken into account in all development planning processes.
- **Air Quality** - Concern is expressed that the increased traffic resulting from the Project may result in reduced air quality, both localised and across the Sydney Region. Air quality monitoring should be undertaken in adjacent residential areas and lands owned by Council particularly the open space.
- **Water quality** - water quality assessment should be carried out for surface water entering the Cooks River and Alexandra Canal during construction and during the operation of the road.

- Particular consideration should be given to the Botany Bay Water Quality Improvement Targets and the Cooks River Alliance goals for swimming in the river, in addition to ANZECC Guidelines.
- **Landscape character and visual amenity** – It has estimated that about 1,300 trees would need to be removed during construction, including 573 trees within Sydney Airport land. A total of about 1,367 trees could be retained (subject to the measures provided in section 21.6 of the EIS) with 420 of these located within Sydney Airport land. The EIS's tree retention numbers assume that the cabbage tree palms would be transplanted within the Project site. All other trees were identified as not being suitable for transplanting. It is requested that tree removal should be minimised and a replacement ratio of 4 to 1 is recommended;
- Rather than replacing trees (which cannot be replanted within the Project footprint) on Airport land – these trees could be planted in adjacent streets and on residual land devoted to open space. Inner West Council should be consulted regarding identification of suitable locations for replanting.
- **Tree canopy and the urban heat island effect** - In line with the NSW Government initiative to plant five million trees throughout Sydney to increase tree canopy overage from 16.8% to 40% measures are needed to decrease the dangers of extreme heat with more shade, to create wildlife habitats and to increase property values.
- Section 21.3.3 of the EIS estimates that 1,300 trees will need to be removed for the Sydney Gateway Motorway Project. It also recognises that the removal of trees will have an impact on visual amenity and screening. It does not however recognise the correlation between the lack of tree canopy and the urban heat island effect or their role in carbon sequestration.
- It is well established that trees have a positive role in lowering the urban heat island effect by shading built surfaces, deflecting radiation from the sun and releasing moisture into the atmosphere.
- Motorway projects create surface areas which exacerbate the urban heat island effect including road surfaces, ancillary buildings and ancillary structures. Impacts however can be mitigated through the following:
 - using road surface materials which deflect the radiation of the sun;
 - reducing the overall surface area of the project;
 - designing breezeway areas to encourage cooling of hard surfaces;
 - providing extensive landscaping with sustainable irrigation built in; and
 - planting appropriate trees to increase tree canopy coverage.

Recommendations 5.2

- Specific consideration should be given to the following:
 - Replacement of lost trees with advanced tree plantings;
 - Measures should be put in place to limit the urban heat island effect;
 - Road surfaces which deflect the suns radiation should be incorporated;

- A sustainable means for irrigating landscaped areas is to be built into the Project.

6 Contamination

- The Sydney Gateway Project will partially excavate and re-profile the former Tempe Tip. If poorly managed, this work has the potential to cause significant health and environmental impacts in the local area and ongoing liability issues for the Inner West Council.
- All risk associated with construction activities and post-construction changes to the landfill infrastructure should belong to TfNSW as there is no way of segregating Tempe Tip based on who has operational control of the surface. Council currently has responsibility for compliance with regulatory requirements relating to the former landfill, but during construction will have no ability to control whether these are met.
- Any land handed back to Council should meet the criteria under the conditions of approval. Any EMP prepared for long term management should have an objective not to increase the burden on Council and should be approved by Council. Mitigation measures need to ensure there are no impacts on groundwater or adjacent watercourses; and that land is left in a manner that is useful, accessible and low maintenance.

Recommendations 6.1

- All risk associated with construction activities and post-construction changes to the landfill infrastructure should belong to TfNSW.
- Conditions of approval should confirm there will be no unmitigated short, medium or long-term contamination impacts.
- The EMP prepared for long term management should have an objective not to increase the cost burden on council.

7 Flooding and Drainage

- The EIS notes that there are no conditions for flooding under the Major Development Plan and seeks to limit flooding to 20-50mm impacts. This is larger than considered acceptable in other similar projects (e.g. WestConnex and Sydney Metro). These projects were required to demonstrate no increase greater than 10mm in areas already affected by flooding and an increase no greater than 50mm in areas without over floor flooding. Consequently the 20-50mm limit is considered inappropriate and it is requested that this be revised to reflect the “no greater than 10 mm” limit.
- Further analysis is required to demonstrate that overland flows from the areas upstream of the site, within Inner West Council, are not being blocked, redirected, or otherwise increased in depth or hazard.

Recommendations 7.1

- Prior to approval of the Project, the flood and drainage concerns raised in the section above should be fully addressed.

8 Surface water

- It is essential to consider the potential for contaminated water to reach Tempe Wetlands.
- Stormwater quality targets should address pollutant loads and minimising stormwater runoff volume and velocity, through additional measures such as biofilter swales, rain gardens and wetlands.
- Water quality monitoring should be introduced to ensure all impacts on the Cooks River and Tempe Wetlands are adequately controlled.

Recommendations 8.1

- Prior to approval of the Project, the surface water quality concerns raised (above) should be fully addressed.

9 Residual Land

- It is noted that residual land not required as part of the Project's operational footprint, may be available for other uses.
- All residual land should be suitably treated to accommodate open space, industrial and other relevant uses.
- Any remaining land that was previously owned by Inner West Council should be returned at no cost in a usable and viable form to Council and delivered expeditiously to minimise any periods of vacancy.
- It is critical that residual land be readily accessible both for access by users and Council maintenance teams. Concerns are raised about the potential isolation of residual land pockets, as shown in the EIS. It is requested that all residual land should be made readily accessible.

Recommendations 9.1

- Residual land must be adequately remediated and be in useable condition prior to being handed back.
- Residual land must be well integrated with the local road network and not be isolated.
- TfNSW should engage with Council and collaborate on the future use of residual land to support council's and community priorities.



Conclusion

SSROC member councils form a large part of Greater Sydney and have a direct interest in supporting and advocating for investment in more effective transport infrastructure to achieve better place-based planning. SSROC welcomes that the Sydney Gateway Motorway Project will provide local benefits by connecting to the Sydney Airport and encouraging WestConnex traffic to remain on the motorway rather than filter through adjacent streets. We recommend that the issues raised in this submission be further considered and addressed.

In order to make this submission within the timeframe for receiving comments, it has not been possible for it to be reviewed by councils or to be endorsed by the SSROC. I will contact you further if any issues arise as it is reviewed. If you have any queries please do not hesitate to contact me or Mark Nutting, SSROC's Strategic Planning Manager on 8396 3800.

Again, thank you for the opportunity to comment on the draft Major Development Plan and we are keen to participate in further stages of developing the Major Development Plan, in particular discussions about its impact on, and collaborative engagement with, local councils.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Helen Sloan'.

Helen Sloan
A/General Manager
Southern Sydney Regional Organisation of Council