



INNER WEST COUNCIL

Council ref: DWS 4021521
Contact: Gill Dawson
Phone: 9367 9044

27 October 2016

Director, EIA Improvement Project
Department of Planning & Environment
EIAproject@planning.nsw.gov.au

Dear Director,

Thank you for the opportunity to comment on the EIA process.

Council would like to make the following comments:

- The duration provided for public comment is inadequate, particularly in relation to Council submissions as they do not take into account the lead time/timing for the preparation of reports for Council meetings. More complex projects will often require a Councillor briefing as well as a submission.
- The manner in which notice of a public exhibition period is often inadequate, with large proportions of the community either missing the opportunity to submit or only have a short time (after they find out about the exhibition) to prepare their submission.
- Response to Submission Report – the responses are often very cursory and do not adequately address the issues contained in the submission. Consideration should be given to the Response to Submissions Report being prepared, not by the applicant, but by the DPE or by an independent consultant team appointed by the DPE. Consideration should also be given to presenting the Response to Submissions Report at a public meeting and so making the DPE directly answerable for their responses.
- In relation to traffic and transport assessment it is important that:
 - Traffic modelling assumptions be provided
 - If micro-simulation models are used the video files/movies should be freely available to the public as part of the EIS exhibition
 - Mode share targets should be identified (and should be in keeping with local or state government strategies) and the parking/traffic should support these targets. A transport load factor analysis should also be provided as an indication of what additional public transport/active transport demand will be generated and how this will be accommodated

Customer Service Centres

Petersham | P (02) 9335 2222 | E council@marrickville.nsw.gov.au | 2-14 Fisher Street, Petersham NSW 2049

Leichhardt | P (02) 9367 9222 | E leichhardt@lmc.nsw.gov.au | 7-15 Wetherill Street Leichhardt NSW 2040

Ashfield | P (02) 9716 1800 | E info@ashfield.nsw.gov.au | 260 Liverpool Road Ashfield NSW 2131

- Monitoring and review of projects after completed. The follow-up on major projects (once completed) need to be significantly enhanced. There appears to be few consequences for developers if the statements in the EIS do not correlate with the real world once the project is operational. There needs to be periodic follow-up, monitoring and remediation after projects are completed and this should not be limited to a 3 or 6 month period. The consequences of many projects are not fully noticeable until well after their completion;
- Records should be kept of projects that have not matched the EIS to establish a data base of aspects which may vary over time. This could then be used to inform and fine tune future EISs.
- Where major projects have approvals (e.g WestConnex), the EIA require information be provided for the entire project – not in isolation.
- Concur with the discussion paper's point about improving the quality and readability of EIS without compromising technical standards.

Should you wish to discuss the matter further, please contact me on 9367 9044.

Yours sincerely,



Gill Dawson

Manager - Environment and Urban Planning, Leichhardt

Customer Service Centres

Petersham | P (02) 9335 2222 | E council@marrickville.nsw.gov.au | 2-14 Fisher Street, Petersham NSW 2049

Leichhardt | P (02) 9367 9222 | E leichhardt@lmc.nsw.gov.au | 7-15 Wetherill Street Leichhardt NSW 2040

Ashfield | P (02) 9716 1800 | E info@ashfield.nsw.gov.au | 260 Liverpool Road Ashfield NSW 2131