

10 Justification and conclusion

Chapter 10 presents a justification for the project and a conclusion to the environmental assessment. It considers a range of issues including management of resources, protection of the environment, ESD and community consultation.

Director-General's requirements

Strategic Justification

Describe the strategic need, justification and objectives for the project (including performance indicators), and consistency with the aims and objectives of relevant State policies and publications, such as the *State Plan* (2006), *Urban Transport Statement* (2006), *City of Cities: A Plan for Sydney's Future* (2005), the *InnerWest Subregion – Draft Subregional Strategy* (2008), and *Sydney Link* (2008).

Project Justification

Identify alternatives to the preferred project considered (including but not limited to the alternatives of the project itself, the bridging options and the configuration for peak hour bus priority lanes during AM and PM peaks), and justify the project taking into consideration the objects of the *Environmental Planning and Assessment Act 1979*.

10.1 Justification

10.1.1 Strategic justification

Justification at the strategic level is established by the degree to which the project objectives are satisfied, the strength of the project need, its consistency with relevant government policy and strategy, and the degree to which the project meets the identified need when compared to potential alternatives and other announced transport initiatives. These aspects are discussed in detail in Chapter 3.

In summary, the project would perform well against the established bus efficiency and reliability indicators with expected reductions in average and maximum bus travel times across the corridor (especially in the AM peak period). The need for the project is recognised by the *Urban Transport Statement* and the project is consistent with the NSW Government's land use and transport policy framework.

In particular, the project would address specific bus efficiency and reliability issues in the corridor, deliver road safety benefits, improve pedestrian and cyclist facilities, and provide better options for managing traffic during a major refurbishment of the existing Iron Cove Bridge.

When considered in the context of potential alternatives, the project would:

- Improve bus reliability and efficiency. This is shown by the projected reduction in maximum and average citybound bus travel times and the improvement in average bus travel speeds.
- Represent good value for money, providing needed transport improvements.

- Maintain AM peak capacity for general citybound traffic while operating within broader network constraints.
- Avoid property acquisition and its associated socio-economic impacts.
- Minimise direct impacts on heritage.

When considered in light of other announced transport initiatives (such as metro rail and pre-paid ticketing) the need for the project remains strong. In particular:

- The project would complement the proposed North West Metro rail link (linking Sydney CBD and north-western Sydney) as part of an integrated response to addressing Victoria Road's transport challenges in both the short and long term. The Victoria Road upgrade would improve public transport travel times and reliability to this area before the North West Metro is fully operational in 2017; beyond then, it would continue to serve an important transport function and would also support the North West Metro as part of an integrated transport network.
- Bus operation measures, such as pre-paid ticketing, would complement the project but would not alone represent an adequate response to the identified need for transport improvements.

10.1.2 Project justification

Justification at the project level considers the project and its interaction with the immediate environment. It is concerned with the degree to which the project objectives are satisfied, and the performance of the project against a range of environmental, social and economic factors.

The project would respond to the project objectives by improving citybound bus travel speeds, travel times and reliability. This would mean a more efficient and reliable citybound service for bus users at a project cost that represents value for money.

A number of potential impacts are associated with the project. Many of these, including impacts on visual amenity, heritage, noise-sensitive uses and utilities, have been minimised through the option selection and design processes. Remaining impacts are identified and considered as part of this environmental assessment, and mitigation measures are proposed.

In brief, the project would bring changes that would affect, both positively and negatively, the amenity of the area. Some of the adverse impacts would include a loss of public open space (an area of King George Park), visual and overshadowing impacts associated with the provision of a new bridge, and parking restrictions in Drummoyne, which would have some impact on businesses adjoining Victoria Road. On the other hand, the project would also improve pedestrian and cyclist facilities, and provide greater connectivity in the area.

Overall, it is considered that the substantial benefits that the project would deliver would outweigh the adverse impacts associated with it.

10.1.3 Objects of the EP&A Act

The objects of the EP&A Act provide a framework within which the justification of the project can be considered. Table 10-1 presents these objects and their relevance to the project.

Table 10–1 **Objects of the EP&A Act and relevance to the project**

EP&A Act object	Comment
Encourage the proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment.	The project would improve the transport network, and promote the use of sustainable modes of transport.
Encourage the promotion and co-ordination of the orderly and economic use and development of land.	The project would allocate road space for use by buses and maintain capacity for citybound general traffic. The benefits that would result have economic value.
Encourage the protection, provision and co-ordination of communication and utility services.	The project is designed to minimise impacts on communication and utility services.
Encourage the provision of land for public purposes.	Not relevant to the project.
Encourage the provision of co-ordinated community services and facilities.	The project would improve an element of the transport network on which the community relies. It would also deliver better pedestrian and cyclist connections to the Bay Run.
Protect and conserve native animals and plants, including threatened species, populations and ecological communities, and their habitats.	The project would occur within a highly modified and disturbed urban environment. It would have only minor impacts on native plants and animals, including threatened species, populations and ecological communities and their habitats.
Ecologically sustainable development.	Refer Section 10.1.4.
Provide and maintain affordable housing.	Not relevant to the project.
Share the responsibility for environmental planning between the different levels of government in the State.	The responsibility for environmental planning and approval in relation to the project rests with the State Government. Consultation has, however, occurred across all levels of government.
Provide increased opportunity for public involvement and participation in environmental planning and assessment.	The project development process has involved extensive consultation with relevant parties. Consultation undertaken and proposed is outlined in Chapter 5.

10.1.4 Ecologically sustainable development

Ecologically sustainable development (ESD) is development that improves the total quality of life, both now and in the future, in a way that maintains the ecological processes on which life depends. The principles of ESD have been an integral consideration throughout the development of the project.

The EP&A Act recognises that ESD requires the effective integration of economic and environmental considerations in decision-making processes. There are four main principles supporting the achievement of ESD:

- Precautionary principle.
- Inter-generational equity.
- Conservation of biological diversity and ecological integrity.
- Improved valuation and pricing of environmental resources.

These are discussed below.

Precautionary principle

The precautionary principle deals with certainty in decision-making. It provides that where there is a threat of serious or irreversible environmental damage, the absence of full scientific certainty should not be used as a reason to postpone measures to prevent environmental degradation.

The environmental risk analysis documented in Chapter 8 covers the potential impacts of the project. That analysis and the environmental assessment as a whole identify no threat of serious or irreversible environmental damage.

The threat of serious or irreversible environmental damage is one of the essential preconditions to the engagement of the precautionary principle. As the environmental assessment did not identify a threat of serious or irreversible environmental damage the precautionary principle does not operate.

However, as outlined in Chapter 8, the environmental risks of the project have been fully assessed and considered.

Inter-generational equity

Social equity is concerned with the distribution of economic, social and environmental costs and benefits. Inter-generational equity introduces a temporal element with a focus on minimising the distribution of costs to future generations.

The project has been developed to minimise social and inter-generational inequity through the provision of more reliable and efficient public transport which is available to broad sections of the community. While the project would have some impacts, they are not of a nature or extent that would result in disadvantage to any specific section of the community or to future generations.

Conservation of biological diversity and ecological integrity

The twin principles of biodiversity conservation and ecological integrity have been a consideration during the course of the design and assessment process with a view to identifying, avoiding, minimising and mitigating impacts.

Those elements of the project through Drummoyne and Rozelle would occur in a highly modified environment which contains little potential habitat for threatened species. As a result, potential impacts on terrestrial species would be minor. Within Iron Cove, impacts would generally be associated with the disturbance of a small amount aquatic habitat that is otherwise well represented in the estuary. Mitigation measures are proposed to address potential impacts and improve biodiversity outcomes associated with the project.

Improved valuation and pricing of environmental resources

The principle of internalising environmental costs into decision making requires consideration of all environmental resources which may be affected by a project, including air, water, land and living things. While it is often difficult to place a reliable monetary value on the residual, environmental and social effects of the project, the value placed on environmental resources within and around the corridor is evident in the extent of environmental investigations, planning and design of impact mitigation measures to prevent adverse environmental impacts.

Environmental benefits, as a result of car users moving to bus, were also considered as part of the economic assessment (Section 3.6). These benefits represented about eight percent of the total benefits, which is a higher proportion than other similar projects.

10.2 Conclusion

The Victoria Road upgrade project would:

- Satisfy the objectives to:
 - Improve the efficiency of bus services on Victoria Road through Drummoyne and Rozelle as defined by peak period bus travel times.
 - Improve the reliability of bus services on Victoria Road through Drummoyne and Rozelle as defined by reduced variability in peak period bus travel times.
 - Maintain peak direction traffic flow as defined by travel times.
- Improve pedestrian and cyclist facilities.
- Provide better options for managing traffic during major refurbishment of the existing Iron Cove Bridge.
- Provide road safety benefits.

Potential adverse impacts associated with the project have been fully assessed and strategies to avoid, minimise and mitigate those impacts have been an integral part of the project development process. A number of commitments have also been made to ensure the best possible environmental outcomes are achieved during the construction and operation of the project.