SUBMISSION

SYDNEY METRO WEST

Critical State Significant Infrastructure Application

Rail Infrastructure, Station, Precincts & Operations EIS

MAY 2022

City of Canada Bay

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1. INTRODUCTION

This submission provides Council's response to the exhibition of the Critical State Significant Infrastructure (CSSI) application for:

- The rail infrastructure, stations, precincts and operations Environmental Impact Statement (released in March 2022)
- Supporting technical papers.

Sydney Metro West (Metro West) will be an underground rail line connecting Greater Parramatta and the Sydney central business district (CBD), doubling rail capacity between the two CBDs, linking new communities to rail services and supporting employment growth and housing supply.

Of the station locations between Westmead and The Bays, there are three stations within the City of Canada Bay Local Government Area at North Strathfield, Burwood North and Five Dock.

Council submitted comments on the Sydney Metro West Concept and Stage 1 EIS in June 2020.

About the City of Canada Bay

The City of Canada Bay is a vibrant and diverse city in the heart of Sydney's inner west. With many parks and reserves, our City is surrounded by river foreshore and is located only 7 kilometres from the Sydney CBD.

The traditional owners of our City are the Wangal clan of the Dharug people, who hold a deep connection to the land, river and foreshore.

Our City has many areas of unique character, including the suburbs of North Strathfield, Concord and Five Dock. Generally these suburbs have experienced little change and are characterised by established, low-density housing, including original Federation Bungalow and Inter-War Californian Bungalow dwelling houses.

In 2021, the estimated residential population of the City of Canada Bay was 95,919 (2021 ABS Estimated Residential Population), having grown rapidly from a population of nearly 54,000 in 1996. In recent years there has been an increase in apartment living, particularly in Rhodes, but also in local centres and areas close to Parramatta Road.

We also have significant commercial and retail areas that provide jobs for local residents and workers from the wider metropolitan area. Our Strategic and Local Centres include Concord, Drummoyne, Five Dock, North Strathfield and Rhodes/Concord Hospital, amongst others and provide lively hubs for work, dining, entertainment, health and other social and cultural activities.

Importance of Metro West to the Canada Bay Community

Metro West will be transformative for the residents of Canada Bay; providing increased access and connectivity for residents, business and visitors. In-principle, Council welcomes

this NSW government investment in public transport in the City and the benefits it will bring once operational.

A significant proportion of Canada Bay residents (79% in 2016) travel to work outside of the LGA. However, due to the current lack of transport choice and minimal public transport provision, the LGA has a high level of car ownership and at the 2016 census, 65% of all trips were made by private vehicle.

Metro West will increase the availability of alternate transport modes and will play an important role in achieving the *Canada Bay Local Strategic Planning Statement* (LSPS) priority to 'improve connectivity throughout Canada Bay by encouraging a modal shift to active and public transport.'

When complete, Metro West will connect the residents of Canada Bay with employment opportunities outside of the LGA and will also benefit local business by providing faster and more accessible public transport for employees and customers.

Increased connectivity will make the LGA a more attractive place to do business and is likely to benefit the local economy, through increasing patronage and local access to recreation facilities and events.

More widely, Metro West will provide new public transport links between Paramatta and the City, assisting in reducing carbon emissions and air pollution in the long-term, and improving socio-economic opportunities for communities serviced by the route.

2. EIS INTRODUCTION AND CONTEXT (CHAPTER 1)

The following issues have been identified in relation to Chapter 2 Introduction and Context.

Inadequate information

The Secretary's Environmental Assessment Requirements (SEARs) for the project require the level of assessment in the Environmental Impact Statement to be sufficient to ensure that government agencies are able to understand and assess impacts.

In general, the Figures provided within the EIS are inadequate and do not provide sufficient detail to understand or assess impacts. Information that is not provided but is fundamental to appreciate development outcomes include:

- building height in metres or RLs
- scales on plans
- dimensions of buildings (width and length)
- width of laneways and pedestrian links
- setback of buildings from boundaries.

It is not appropriate or reasonable to defer this information being provided to the detailed design phase. This basic information is fundamental where the Critical State Significant Infrastructure application is seeking approval for stations and precincts.

Impacts on the public domain, compliance with relevant planning standards and overshadowing are unable to be adequately assessed due to the lack of information provided.

Strategic plans

Our Community Strategic Plan, *Your Future 2030* is an overarching plan for the future of the City of Canada Bay. The Plan has 5 key vision areas that are aligned with the aspirations and priorities of our community. They are:

- Inclusive, involved and prosperous
- Environmentally responsible
- Easy to get around
- Engaged and future focussed
- Visionary, smart and accountable

The LSPS, completed earlier in 2020, is the core strategic planning document for the City of Canada Bay. It will guide the character of our centres and neighbourhoods into the future and implement the priorities and actions of the Eastern District Plan at a local level. The LSPS can be accessed at https://www.canadabay.nsw.gov.au/localplanning

The LSPS sets out our land use vision:

- Create great streets, places and buildings for people
- Plan for a diversity of housing types and affordability
- Protect and enhance local character
- Connect and strengthen neighbourhoods and centres
- Align growth with the delivery of infrastructure
- Ensure Sydney Metro West delivers "density done well"
- Improve access to the Parramatta River foreshore
- Facilitate sustainable development and renewal
- Increase biodiversity and the urban tree canopy.

The LSPS sets out 19 planning priorities and associated actions for the City of Canada Bay. Of particular relevance to Metro West is:

> *Priority 1: Planning for a city that is supported by Infrastructure*, and
>
> *Priority 11: Identify land use opportunities and implications arising from Sydney Metro West.*

Both *Your Future 2030* and the LSPS recognise the importance of **connectivity, inclusion, sustainability and local character** to the Canada Bay community. The LSPS envisages Metro West and its associated renewal, as "density done well". The City's LSPS vision and priorities should be referenced throughout the planning stages of Metro West as they provide, the outcomes that Council would like to see delivered by the project.

Recommendations

Council recommends the following relating to the introduction and strategic context:

- That *Your Future 2030* and the City of Canada Bay LSPS are used as a reference and guide to understand the land use vision and aspirations for the City of Canada Bay in the Stage 3 EIS and future applications for detailed design of the stations, ancillary buildings and precincts surrounding the station.
- That the Critical State Significant Infrastructure application and EIS be updated prior to consent being given to provide basic information where consent is sought for envelopes relating to metro station/services facilities and precinct related infrastructure:
  - Scale on all Figures
  - Building Height in metres/RLs
  - Dimensions illustrating the proposed setback of new buildings from boundaries
  - Dimensions illustrating the proposed upper-level setbacks of buildings
  - Dimensions illustrating the width of new service laneways, pedestrian links and new public space

3. NAMING OF STATION IN CONCORD

The following issue has been identified in relation to the naming of the proposed station in Concord.

Naming of the Station at Concord Oval

The new station on the corner of Burwood Road and Parramatta Road has been labelled by Sydney Metro as “Burwood North”. The station box is to be located on the northern side of Parramatta Road in the suburb of Concord. Sydney Metro has advised the City of Canada Bay that this station name is a working title without official status.

Parramatta Road forms the effective boundary between Concord and Burwood, with the station being located within the suburb of Concord. A number of businesses on the northern side of Parramatta Road include the word "Concord" in their names. Concord Oval stands some 200m from the new Metro Station site and as the largest landmark close to the station, offers an appropriate name for the new Metro station.

Council resolved on 15 March 2022 to strongly advocate for the official naming of this Metro Station as "Concord Oval" (with the current working title of "Burwood North").

Recommendations

Council recommends the following in regard to the naming of the station within Concord:

- That a suitable condition be imposed that requires Council and the community to be consulted on the name for the new station proposed in the suburb of Concord, prior to any application being made to the Geographical Names Board.

4. STAKEHOLDER ENGAGEMENT (CHAPTER 3)

The following issues have been identified in relation to Chapter 3 Stakeholder Engagement.

- The list of key local stakeholders is missing a number of stakeholder groups with an interest in the proposal, including:
  - Five Dock Chamber of Commerce
  - Concord Chamber of Commerce
  - Our Lady of the Assumption Catholic Primary School
  - Concord High School
  - St Marys Catholic Primary
  - Rosebank College
  - Domremy College
  - BayBUG (Canada Bay Bicycle User Group)
  - Canada Bay Access and Inclusion Committee
  - Co.As.It. Italian Association of Assistance

- Throughout the construction and post-construction of Sydney Metro West, Council will ensure all community feedback and recommendations are referred to the Sydney Metro West via Sydney Metro's community information line on 1800 612 173 and/or via email to sydneymetrowest@transport.nsw.gov.au. The intent of the information line is to respond to emerging issues immediately, by having the issue referred to the relevant responsible teams within Sydney Metro.

Recommendations

- The Stakeholder Engagement Plan should be extended to include the above listed additional stakeholder groups.
- The NSW Government continue to implement and promote the availability of a Complaints Management System to address concerns experienced by community affected by the works associated with Sydney Metro West project.

5. METHODOLOGY (CHAPTER 4)

The following issues have been identified in relation to Chapter 4 Methodology.

Transport:

- The issue of parking is not given enough emphasis, particularly with respect to the anticipated increase in demand in parking in the surrounding precincts, as a result of park-and-ride customers using the stations. This will drive an increase in parking demand around the stations and therefore require additional detailed assessment by Sydney Metro West.
- There is already significant on-street parking demand from shoppers, residents and existing commuters. The impacts of construction workers parking in station precincts has not been addressed in the Construction Transport Assessment. Construction workers must not utilise carparking spots adjacent to construction sites nor occupy spots within 200 metres of local shops and services.

Landscape and visual amenity:

- The development of public domain associated with stations should interface seamlessly with Council's public domain and comply with relevant planning controls in each station precinct.

Recommendations

- Parking studies of each station precinct should be undertaken prior to approval of this application with the scope of these studies to be determined in consultation with Council.
- Parking arrangements for station construction workers should ensure that workers are not parking in and around town centres adjacent to the stations and exacerbating existing parking issues.
- Detailed public domain plans should be prepared for each station precinct to demonstrate how a seamless interface between Council's public domain and each station precinct will be achieved.
- That the detailed designs for station precincts be required to align with relevant planning controls (LEP, DCP and exhibited planning proposals).

6. PROPOSAL DESCRIPTION – OPERATION (CHAPTER 5)

The following issues have been identified in relation to Chapter 5 Proposal Description – Operation.

Heritage interpretation devices

- The recommendations for heritage interpretation devices are broadly specified across the three stations. Further consultation should occur with Council prior to approval and implementation of proposed heritage interpretation measures for each station location.

Residual land (land surplus to Metro needs)

- Sydney Metro West has acquired land for the purposes of this infrastructure project. The proposed uses for any residual land following completion of construction are not well-detailed for North Strathfield, Concord Oval/Burwood North or Five Dock and further work is required to ensure that development of residual land is considered strategically. In particular, Metro is requested to collaborate with Council in identifying where residual land can be put to relevant community uses and infrastructure, and long-term maintenance plans agreed to prior to the potential dedication of land to Council and/or other agencies.

Design processes

- The EIS document does not specifically mention the relevant local planning controls within City of Canada Bay or how these will be addressed in further design of the proposal. Given the interface with Council's assets and public domain in many areas of the proposal, designs need to be subject to Council approval, *prior* to consideration by the Sydney Metro Design Advisory Panel (also to be known as the Sydney Metro Design Review Panel, once planning consent for this application is granted).

Recommendations

- A condition of any approval for heritage interpretation devices should include a detailed interpretation plan to be prepared in partnership with Council.
- Council should be consulted in the investigation of appropriate uses for residual land, with a view to ensuring that uses are complementary to the area.
- All designs within Canada Bay Council area need to be subject to Council approval, *prior* to consideration by the Sydney Metro Design Advisory Panel (also to be known as the Sydney Metro Design Review Panel once planning consent is granted on this application).

7. PROPOSAL DESCRIPTION – CONSTRUCTION (CHAPTER 6)

The following issues have been identified in relation to Chapter 6 Proposal Description - Construction.

Environmental management framework

- Clarification is sought regarding the details of waste management plans for demolition and construction, as the waste management mitigation measures outlined in Appendix B and Appendix F lack detail in the areas of waste volumes, temporary storage arrangements, transport and destinations for waste. Large volumes of waste are generated from significant projects such as Sydney Metro West. It is critical that waste generated does not impact upon the health and wellbeing of the community within the immediate vicinity, as well as the wider geographical area in removal of waste. Ongoing monitoring is essential, as are detailed Waste Management and Mitigation measures.

Recommendations

- Waste management plans should be updated to include details on volumes, temporary storage, transport and destination to ensure impacts on the local community are minimised.
- Ongoing monitoring of waste management and mitigation need to be undertaken and clearly articulated through regular public reporting and updates.

8. NORTH STRATHFIELD METRO STATION (CHAPTER 10)

The following issues have been identified in relation to Chapter 10 North Strathfield Metro Station.

Design guidelines

- The proposed design guidelines show public space fronting Pomeroy Street as part of the station development, however the long-section provided in Chapter 10 of the EIS shows that the station function fronting this public domain will be station services, offering no activated frontage to the identified public domain. The activation of this public domain will lead to significantly better safety and amenity outcomes and provide passive surveillance of Pomeroy Street and the associated walkway into the station.
- The area to the west of the station is currently zoned for high-density residential development and subject to urban renewal in the coming decades; and the commercial and entertainment area (Bakehouse Quarter) will also access the station from the west, placing greater emphasis on the western entry than shown by the current design, which is primarily east-facing. Given the constraints of the western side of the station, careful consideration relating to activation needs to be part of the design guidelines for this important access point.

Landscape and visual amenity

Council has identified the following issues regarding landscape and visual amenity at North Strathfield Station (more general comments relating to landscape and visual amenity assessment are detailed in Section 15 of this submission):

- Figure 10-2 Indicative long-section for North Strathfield Station illustrates a three (3) storey structure at the northern end of the site. There is no scale, height of building in metres or dimensions shown on the plan. The proposed three storey structure contrasts with the following statement on page 10-43 of the EIS: *The building would be set back from the corner of Queen and Pomeroy Street, rising about six to seven storeys at the northern end of the buildings…*

  A seven (7) storey building in this location is incompatible with the prevailing character of the immediately locality, which is characterised by one (1) to two (2) storey dwelling houses and residential flat buildings on the eastern side of Queen Street. The photo montages provided in Figures 10-17 and 10-19 do not effectively communicate the true scale of the proposed building in this location.
- The *City of Canada Bay Urban Tree Canopy Strategy and the City of Canada Bay Local Strategic Planning Statement* seek to increase the amount of tree canopy through the protection and planting of trees. These strategies are reinforced by the SEARs and condition for consent for the Stage 1 EIS that require an increase in tree numbers and

canopy within proximity of the impacted area in accordance with the concept approval.

The proposed works will result in the removal of:

- Certain trees along Queen Street adjacent to the northern construction site
- All vegetation along the western side of Queen Street from Wellbank Street to Pomeroy Street

The Critical State Significant infrastructure application does not provide any certainty that tree canopy will be increased in accordance with the requirements of the SEARs, the conditions of the original Concept Approval or the Canada Bay LSPS.

While figures are provided to illustrate the extent of tree removal under the Stage 1 EIS, there is no inventory or plan that illustrates all significant trees that are proposed to be removed or a plan that clearly illustrates new trees to be planted. As this application seeks approval for station precincts, it is imperative that sufficient detail be provided to ensure that objectives and requirements in relation to urban tree canopy are realised. It should also be recognised that replacement of removed trees, represents a loss in tree-canopy, as it will be decades before young trees grow.

- There are heritage-listed trees and the heritage listed Concord West Railway Station Park (Fan Garden) adjacent to the eastern boundary of North Strathfield station. Without a detailed site plan that clearly illustrates the impact on these trees, Council is unable to respond to the proposed station design, nor the precinct design.
- Design and proposed materials at this station need to be sympathetic to the heritage values of the station and better integrate with the heritage aspects, given the heritage listing of the railway station, and adjacent items.

Non-aboriginal heritage

- The removal of the existing fan garden at North Strathfield station represents a moderate heritage impact to this precinct and has not been mitigated in the proposal. It is Council's desire to retain this garden and protect it through the course of construction or reinstate it following the completion of construction.
- There are a number of significant heritage items in the station precinct that need to be protected from damage during construction and through mitigation measures that should be subject to Council approval.
- It is noted that Aboriginal Heritage has not been specifically addressed in the Stage 3 EIS. The justification provided is that during the stakeholder and community engagement, targeted consultation was undertaken with the local Aboriginal community and knowledge holders, including an Aboriginal Focus Group. There were no further requests by the community, including Registered Aboriginal Parties, in relation to aboriginal heritage. However, Sydney Metro West has indicated it will be piloting the Draft Connect with Country Framework published by the Office of Government Architect. Aboriginal cultural heritage interpretation will be undertaken through artworks, replicas of artefacts, native gardens and digital displays. The Draft

Heritage Interpretation Strategy (Appendix K) prepared for this application, will provide the interpretation of Aboriginal cultural heritage values.

Local Businesses

- The EIS shows the removal of all public parking outside of existing businesses on the eastern side of Queen Street. This loss of parking will have a significant impact on these businesses that have historically had a large number of time-restricted parking spaces available for their customers.

Transport

The following issues have been identified regarding transport at North Strathfield Station (more general comments relating to the transport assessment are detailed in Section 14):

- The kiss-and-ride provisions for North Strathfield station appear insufficient to meet the demand that is forecast for this station. The proposal shows the removal of two existing kiss-and-ride spaces on the eastern side of North Strathfield Station with no additional kiss-and-ride spaces to be provided to supplement this loss. Similarly, the proposed extension to kiss-and-ride spaces on the western side of the station in Hamilton Street East conflicts with existing 1/4P parking that is heavily utilised by the adjoining school and nearby childcare centre.
- The proposed cycle route indicated along Pomeroy Street and to the north of the station along Queen Street was previously displayed in Council's 2014 *Strategic Bike Plan Review*, however the route has been determined to no longer be viable within existing constraints (including the intersection of George Street and Pomeroy Street) and would not meet the current standards for cycling infrastructure. Detailed designs relating to active transport, to be prepared by Sydney Metro, must take this into consideration. Alternative routes and network designs require additional funding to eventuate, given the complex urban context of this area.
- The increase in pedestrian volumes on footpaths surrounding the station is likely to exceed the capacity of these footpaths when assessed on the basis of criteria provided in the *Walking Space Guide (Transport for NSW, 2022)*. Pedestrian access is the main mode of travel to be used in accessing the future station. It is essential for the pedestrian access plan to clearly articulate issue of pedestrian volume and how this will be served by adequate provision of pedestrian pathways.
- The existing footpath on the eastern side of Queen Street has severe crossfall (6-11%) which will need to be upgraded to improve accessibility to bus stops, kiss-and-ride points and to and from Sydney Metro West station
- No taxi rank has been provided for in the proposed station precinct design.
- Clarification is sought regarding whether cycle parking to the south of the station will be retained during construction and operation.

- The suitability of Pomeroy Street as a primary construction access route has been the subject of previous investigations due to the mass limit of the Powells Creek bridge which is only suitable for General Mass Limit vehicles.

Flooding and hydrology

Council has identified the following issues regarding flooding and hydrology at North Strathfield Station (additional comments relating to the flooding and hydrology assessment are detailed in Section 16):

- Flood model inputs for North Strathfield assume that the station box is blocked from floodwater as part of the baseline conditions. It is not clear why this assumption has been adopted or why a flood study on the existing condition was not undertaken. This assumption makes the assessment of the impacts of the station box with respect to flows, flow distribution and velocities difficult to compare to existing conditions.
- Council's Concord West Flood Study (Jacobs, 2015) shows that the station box is located in the 1% AEP flow path. The EIS assessment has not clearly shown the impact of the station box and associated civil works within the flood path area on flow distribution and flow diversion through the precinct.
- Existing hydrology description identifies the Powells Creek as a moderately sensitive receiving environment, however it is Council's view that these sedimentation levels are quite high and would warrant a higher level of sensitivity.
- Existing hydrology description identifies 0.3m of ponding at Queen Street; this is high enough to warrant more detailed description of baseline flooding conditions including flow velocities are associated with this increase.
- Flooding impacts for the construction scenario show that there will be a reduction in flood storage as a result of the proposal, however the mitigation for this reduction in flood storage has not been identified as part of the assessment.
- Flooding impacts for the construction scenario show that there is potential for the blocking of drainage in the precinct, however no contingencies for removing blockages in the drainage network have been identified as part of the assessment.

Recommendations

- The design guidelines for the station should include activation of the station frontage onto Pomeroy Street and the associated public domain.
- The design guidelines need to include more activation and surveillance to improve the safety and the amenity of the Hamilton Street entrance and improve wayfinding for customers entering the western side of the station.
- The Critical State Significant Infrastructure application and EIS should be updated to confirm the maximum building height for all above ground structures at North Strathfield prior to any consent being issued.
- A suitable planning condition should be imposed that requires:

  - a plan to be prepared that illustrates the location and inventory of all trees proposed to be removed;
  - a plan to be prepared that illustrates the location and inventory of all replacement trees to be planted. This plan should demonstrate how the project will provide an increase in the number of mature of trees to a ratio of 2:1 and result in a net increase in tree canopy coverage over a 9 or 10 year period; and
  - detailed precinct design plans to be prepared that demonstrate how heritage listed trees and landscaping will be protected and/or retained.
- Any removal of the fan garden at North Strathfield station needs to be re-evaluated to mitigate the heritage impact of the proposal with consideration given to how the garden could be reinstated as part of future public domain design.
- Mitigation plans to protect heritage items need to be subject to Council consultation and approval.
- Request for the design and proposed materials to be sympathetic to the heritage values of the station and integrate with the heritage aspects.
- Prior to the consent being granted to this application, the EIS needs to be updated to demonstrate how it mitigates impact to customer car parking and phasing the loss of car parking until such time as the Metro is operational.
- The location and provision of kiss-and-ride spaces need to be re-evaluated in light of the existing constraints around the station box.
- The proposed cycle access needs to be reviewed in light of changes to Council's proposed cycle network as exhibited in Council's 2014 *Strategic Bike Plan Review*.
- The adequacy of footpaths surrounding the station needs to be re-evaluated using the criteria set out in the *Walking Space Guide (Transport for NSW, 2022)* and upgraded where necessary.
- The existing footpath on eastern side of Queen street has severe crossfall (6-11%), which will need to be upgraded to improve accessibility to bus stops, kiss-and-ride and to and from Sydney Metro West station.
- A taxi rank needs to be provided within line-of-sight of the station entrances.
- Construction routes needs to be reviewed further as part of the Construction Transport Management Plan to ensure that the routes are suitable for construction vehicles.
- The suitability of Pomeroy Street as a construction route needs to be re-evaluated based on the mass limit of Powells Creek Bridge.
- Baseline flood modelling needs to be updated to accurately reflect existing conditions and remove the assumption that the station box is blocked from floodwater as part of the baseline conditions prior to the issue of the consent.

- The existing hydrology description should be updated to accurately reflect sedimentation conditions at Powells Creek and ponding levels at Queen Street.

9. CONCORD OVAL (BURWOOD NORTH) STATION (CHAPTER 11)

The following issues have been identified in relation to Chapter 11 Concord Oval (Burwood North) Station.

Landscape and visual Amenity

The following issues have been identified regarding landscape and visual amenity at Concord Oval (Burwood North) Station (more general comments relating to landscape and visual amenity assessment are detailed in Section 15):

- The Stage 1 EIS for Sydney Metro West included the following Place and Design Principle:

  > *Facilitate activation and urban renewal in accordance with the Parramatta Road Corridor Urban Transformation Strategy*

  The City of Canada Bay has prepared a planning proposal to implement the NSW Government's *Parramatta Road Corridor Urban Transformation Strategy* (PRCUTS). The EIS states the following in relation to structural elements for non-station uses and the services building:

  > *The structures described above would be designed to align with future planning controls, zoning plans, and/or strategic plans including the Parramatta Road Corridor Urban Transformation Study and Canada Bay Planning Proposal (page 11-7).*

  The EIS states that the above ground infrastructure would *"rise up to about ten (10) storeys above Burwood Road"* (page 11-4). The structural elements for non-station uses located *"between the northern station entry and services building (are proposed) to about the same height as the services building"* (page 11-7). These statements are unable to be confirmed as none of the Figures have dimensions or RLs (Figures 11-2, 11-3 and 11-6).

  Council welcomes the consistency of the proposed development outcome with PRCUTS and the draft planning framework for this site. As the EIS comprises the relevant application for station buildings, compliance with relevant development standards and controls should be shown as well as stated. It is necessary for the subject EIS to confirm the intended scale of buildings in metres above ground level or through the use of RLs to AHD. The use of generic references to "storeys" is unhelpful and creates uncertainty given floor to ceiling heights can vary considerably, particularly due to the unique needs of station buildings and services associated with the metro.

- Council is supportive of *"generous setbacks to Parramatta Road"* and "*generous setbacks to Burwood Road"* (page 11-12), however no information is provided in the EIS on the dimension of these setbacks. Other than notations identifying that the public domain around the station buildings will be used for "setback area" or

"landscaped area", there is also no detail on the works proposed, in the form of plans or designs. As this EIS is the statutory process to obtain approval for "station precincts", this information is fundamental to enable a proper assessment of the works and provide certainty as to what is being approved.

This issue is of particular importance given TfNSW has identified the potential need for land to be set aside for future road reserve. Any increase in road reserve for Parramatta Road should not be at the cost of providing a landscaped setback to Parramatta Road, that is consistent with the measurements and requirements outlined in the Parramatta Road Corridor Urban Transformation Strategy and Council's planning proposal.

- There is considered significant opportunity to improve the public domain at the entrance of the Concord Oval (Burwood North) station. Whilst the 'adjacent station development' (refer to figure 11-1 and 11-4) is set back from Burwood Road, a better outcome could be achieved if the setback was increased further. An additional setback or an angled building line would improve the line-of-sight to and legibility of the station entrance.
- Access to the station entry and through the precinct (refer to figure 11-5) does not successfully integrate with Burton Lane and Burton Street. It is requested that Sydney metro explore opportunities to provide station entrances Burwood/Burton Lanes, in addition to the entrances marked on Burwood Road and Parramatta Road.
- Only select frontages to pedestrianised routes are proposed to be activated (refer to 11-4). To achieve better safety and passive surveillance, it would be necessary to increase the amount of active uses on the ground floor within the laneways and through site links.

Transport

The following issues have been identified regarding transport at Concord Oval (Burwood North) Station (more general comments relating to the transport assessment are detailed in Section 14):

- The location of the proposed kiss-and-ride area in Burton Street is remote from the station and is likely to lead to illegal or double-parking closer to the station on Paramatta Road and Burwood Road. This parking area is also adjacent to low-density residential properties and may result in driveway obstruction during peak periods.
- The location of the proposed kiss-and-ride area on Burwood Road north of Burton Street may impact on traffic flows, especially during morning peak periods once the intersection of Burwood Road and Burton Street is signalised. Parking on this approach is currently prohibited during the morning peak. Council's preference would be for both southbound lanes on this approach to be continuous travel lanes.
- The proposed cycle infrastructure for Concord Oval (Burwood North) station is not integrated with Council's most recent cycle planning. The most recent cycle routes proposed for the area were publicly exhibited in response to the PRCUTS, which show the new cycle routes identified through the station precinct, including a continuous

cycle route along the north side of Parramatta Road, currently not accommodated for in the station precinct plan.

- The existing pedestrian crossings at the intersection of Parramatta Road and Burwood Road currently do not meet the requirements of AS/NZS 1428.1, however the proposal does not identify the need for these crossing to be brought into compliance with currents standards. Clarification is sought as to whether this is included in the retention of these crossings.
- Clarification is sought on the proposed locations of the entrances to Concord Oval (Burwood North) Station, as they are shown in different locations between Figure 11-1, Table 11-1 Section 11.22 and Figure 11-3.

Flooding and hydrology

The following issues have been identified regarding flooding and hydrology at Concord Oval (Burwood North) Station (more general comments relating to the flooding and hydrology assessment are detailed in Section 16):

- Flood model inputs for Burwood North assume that the station box is blocked from floodwater as part of the baseline conditions. It is not clear why this assumption has been adopted or why a flood study on the existing condition was not undertaken. This assumption makes the assessment of the impacts of the station box with respect to flows, flow distribution and velocities difficult to compare to existing conditions.
- The reported baseline flood hazard in the 5%AEP can reach H5, which will affect pedestrians and needs to be addressed as part of further design.
- Flooding impacts for the construction scenario show that there is potential for the blocking of drainage in the precinct, however no contingencies for removing blockages in the drainage network have been identified as part of the assessment.
- An evacuation strategy for high-hazard flood events has not been provided, this needs to be addressed as part of further design.

Recommendations

- The Critical State Significant Infrastructure application and EIS should be revised to include details of station buildings, service buildings and other related development, including building height in metres or RLs and ground level setbacks from boundaries and upper level setbacks where proposed.
- The Critical State Significant Infrastructure application be subject to an appropriate condition that requires all buildings to have a minimum landscaped set back of 6.0m to Parramatta Road, exclusive of land required for future road reserve.
- An additional setback or an angled building line for building with a frontage to Burwood Road is recommended to improve the line-of-sight to and legibility of the station entrance.
- Sydney Metro to explore station entrances from Burwood/Burton Lanes or in the absence of a new station entrance, ensure that there is a direct pedestrian

connection from the new lane and through site links to the station entrance on Burwood Road.

- Increase the amount of active uses on the ground floor within the laneways and through site links to improve safety and surveillance.
- The location of kiss-and-ride zones should be re-evaluated to be closer to the station and to ensure that they are located in streets that have sufficient width and mid-block capacity to accommodate the pick-up and drop-off demand.
- The proposed cycle access should be redesigned to integrate with the new cycle routes shown in Council's most recent cycle planning, including the provision of a continuous cycle rote along the north side of Parramatta Road.
- The retention of existing pedestrian crossings at Parramatta Road and Burwood Road should include upgrade of these crossing to bring them into compliance with current design standards.
- Baseline flood modelling should be updated to accurately reflect existing conditions and remove the assumption that the station box is blocked from floodwater as part of the baseline conditions.
- Further mitigation detail should be provided for reductions in flood storage, blocking of drainage and evacuation of workers during flood events.
- Further design work needs to be undertaken to reduce the increase in flood levels around the precinct which current modelling indicates would have an adverse impact on residents in the precinct and reduce flood depth that would overtop existing kerbs.
- An evacuation strategy for high-hazard flood events is required and needs to be addressed in all designs.

10. FIVE DOCK STATION (CHAPTER 12)

The following issues have been identified in relation to Chapter 12 Five Dock Station.

Fred Kelly Place

- The application includes a proposed extension to Fred Kelly Place, an area that provides an important civic function for residents and visitors to the Five Dock Town Centre. The Fred Kelly Place extension was contemplated by Council's *Five Dock Town Centre Urban Design Study* and the land was identified for public acquisition and zoned RE1 Public Recreation under the *Canada Bay Local Environmental Plan 2013*. Council is strongly supportive of Sydney Metro realising the extension of Fred Kelly Place as part of the station development in Five Dock.
- It is important that the extension to Fred Kelly Place is undertaken in close liaison and cooperation with Council. Particular consideration will need to be given to the integration of the existing Fred Kelly Place with the proposed extension. This includes the location of public amenities (playground and public toilet), planting, finishes and materials, and the delivery of a space that avoids the use of steps or significant change in levels.

Local Businesses

Local businesses within Five Dock Town Centre have expressed concerns in relation to the viability of their businesses and ability to thrive throughout the construction of Sydney Metro West. In particular, the following are of concern:

- Construction noise
- Dust and traffic
- Decreasing visitor numbers to the centre
- Loss of customer confidence
- Decreased amenity of outdoor dining
- Poor customer access

Local businesses and the Chamber of Commerce requests that:

- Additional car parking be provided to replace those lost during and after construction
- Improved communications with the Metro West team to provide clear and timely advice to businesses so they can effectively plan and manage short term impacts
- Supporting businesses to grow new trade channels online, in the evening and extend trading windows
- Provision of effective and ongoing destination marketing to attract people to the centre through regular events and activations
- Enhancement of the centre's appearance through art lighting and hoarding programs, vacant shop, and site initiatives to create reasons to visit and explore the centre.

Five Dock library

As a critical community resource, the impacts of the proposal on Five Dock library need to be to be carefully managed during construction. The management of construction impacts to the library should include:

- Enhancing the presence of Five Dock Library during construction, through signage and hoarding artwork on the acoustic box, to direct the community towards the library.
- The signage and artwork need to point to safe access routes and clearly note that the library is still open and operating as usual.
- Ensuring noise impacts on the library do not disrupt its normal operation. The noise assessment currently does not separate noise impacts on the library from impacts on residents, and specific levels of noise to the library are not identified. This is not adequate, as library patrons often visit the library for peace and quiet, which are likely to be disrupted by Metro works during construction. As the library is a critical element of local community infrastructure, this impact needs to be considered in its own right.

The library is used for workshops and meetings, where acoustic disturbance will negatively affect the community sessions.

Noise and vibration

- Vibration intensive equipment is proposed to be used at the Five Dock station site during basement excavation and would result in human comfort vibration criteria being exceeded at the nearest receivers.
- The engagement of a Noise Advisor, Acoustic and Noise Program, and Construction Working Hours as specified within the Conditions of Consent issued for Stage 1, needs to continue to apply to all works associated with construction of stations, precincts and ancillary structure.

Landscape and visual amenity

The following issues have been identified regarding landscape and visual amenity at Five Dock Station (more general comments relating to landscape and visual amenity assessment are detailed in Section 15):

- It is difficult to reconcile the statements within the EIS relating to height of proposed buildings with the Figures contained within the EIS (Figures 12-2, 12-3 and 12-19). As these Figures do not include any dimensions or building heights in metres or RLs.
- Despite this EIS being the relevant application for metro station buildings, no certainty is provided in relation to the ultimate form and impact of the development on the land. The photomontage (Figure 12-19) that illustrates no upper-level setback fronting Great North Road is different to the built form diagram that illustrates an upper-level setback above level 2 (Figure 12-6).
- The *Canada Bay Local Environmental Plan 2013* (LEP) prescribes a maximum building height of 15.0m to 17.0m for the land on which the western station building is to be constructed and 17.0m for the eastern station building. The maximum height limit in the LEP is complemented by the *Canada Bay Development Control Plan* (DCP) that includes the following relevant objectives for the Five Dock Town Centre (Part F2.2):

Objective 02 *To ensure areas of open space have access to adequate sunlight, especially in mid-winter between 12-2pm.*

Objective 16 *To reduce potential negative impacts of development such as overshadowing of streets and public open spaces.*

Objective 33 *To ensure adequate sunlight is available for all buildings, streets and public open spaces.*

These objectives are reinforced by development controls in the form of building envelopes (heights and upper-level setbacks) that aim to ensure future development to the north of Fred Kelly Place protects solar access to this public open space (see Figure 1).

Control 46 *For development sites to the north of Fred Kelly Place and the new town square, the maximum building height is to be in accordance with Figure F2.18 Secondary Setbacks and Figure F2.23 Maximum Building Height Zones; and no incursions (including plant, balcony rails etc) are to be permitted.*

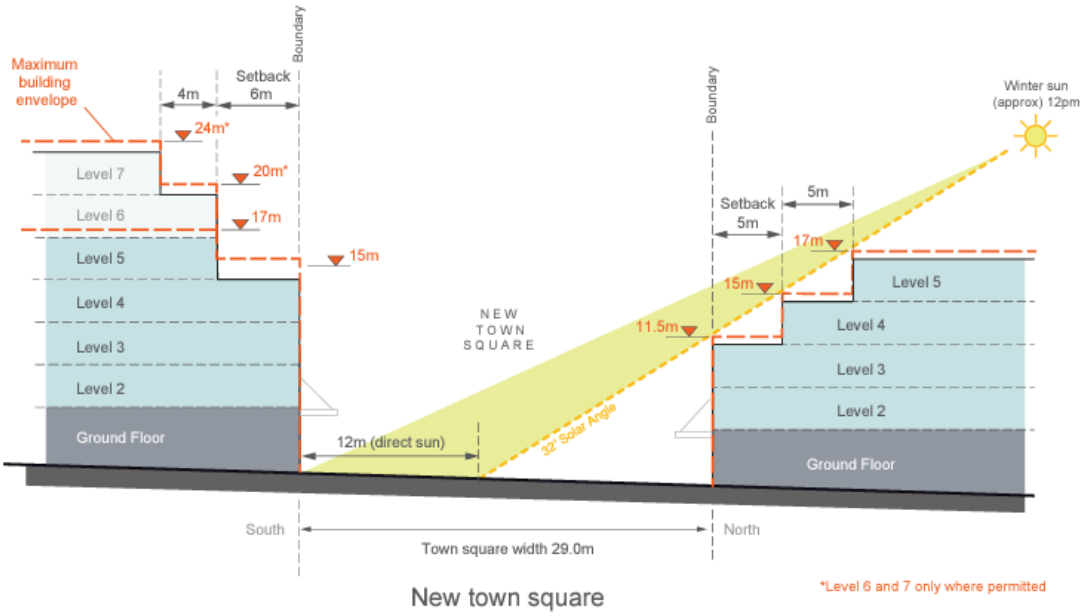

Figure 1: Section illustrating building envelope applicable to land to the north of new town square on eastern side of Great North Road and expanded Fred Kelly Place on western side of Great North Road (Part F, Section D, page F-157)

It is apparent that the building envelope contained within the EIS will result in more overshadowing of Fred Kelly Place than would occur with a development that was compliant with the applicable development controls. This impact appears to occur due to the overall height of the building and the lack of upper-level setbacks above the third and fourth floors.

- The nature of the active street frontage between the station and St Albans church is not adequately described in the EIS. Further clarification is sought to the nature of the proposed active street frontage facing into the St Albans church complex.

Non-Aboriginal heritage

Council has identified the following issues regarding non-Aboriginal heritage at Five Dock Station:

- The proposed bicycle parking adjacent to St Albans Church would negate some of the positive benefits of the proposed setback of the development from the church. The extent and appearance of the bicycle parking is also a concern for visual impact that it may have on the church.
- Only part of the interface of the station structure with the St Albans Church complex has been designated a sensitive interface. The sensitive interface should extend to the full façade of St Albans Church and its grounds.
- The prosed heritage interpretative devices at Five Dock station have the potential to visually dominate St Albans church as the primary visual element in the space. This is an unsatisfactory outcome and is not supported by Council. This issue requires reconsideration by Sydney Metro West.

Transport

The following issues have been identified regarding transport at Five Dock Station (more general comments relating to the transport assessment are detailed in Section 14):

- The *Canada Bay Development Control Plan* includes minimum car parking requirements for retail, office and other non-residential uses. No car parking is proposed to service non-station uses (i.e. retail premises) where these uses are to be co-located with the proposed stations. Whilst metro will play an important role in changing travel behaviour and the mode by which people move around, it is important to recognise the demand for parking generated by development.
- The City of Canada Bay is investigating opportunities to increase the amount of public parking in the Five Dock Town Centre. This initiative seeks to reduce impact of parking on local streets and meet the needs of visitors to the centre as opposed to commuters. Where car parking is unable to be provided on site for non-station uses, Sydney Metro should contribute towards the provision of public car parking elsewhere in the Five Dock Town Centre.
- The location of the proposed kiss-and-ride zones in Waterview Street and Second Avenue are inconsistent with the traffic conditions on these streets. These are both narrow streets which can only accommodate a single lane of traffic at a time when vehicles are parked on both sides of the road and would be generally unsuitable to high frequency pick-up and drop-off activity during peak periods. An assessment of the midblock capacity of these streets to accommodate the forecast pick-up and drop-off demand has not been undertaken to show that these streets can accommodate these functions once the station is built.
- Similarly, the proposed kiss-and-ride zone on the southern side of Second Avenue conflicts with existing private driveway access and planned future vehicle access to a north-south laneway shown in the station precinct site plan.

- The proposed taxi rank is also a significant distance from the station and not visible from station entry and exit points.
- Due to the proximity of East Street to the station box and the relative distance of the proposed kiss-and-ride zones from the station entry, it is likely that East Street will function as a *de facto* kiss-and-ride zone. The existing cul-de-sac at the end of East Street is inadequate to accommodate a standard sized vehicle performing a U-turn in a single manoeuvre and will likely result in significant congestion along East Street.
- The proposal indicates that the existing bus zone on the western side of Great North Road (between Garfield Street and the pedestrian crossing) will no longer be required, however it is unclear what the proposed function of this kerbside space will be.
- The proposed cycle route on East Street terminates at the frontage of the station box, however there is likely to be demand for this cycle route to continue past the station through to Henry Street. As currently shown in the station precinct plan, this cycle route is unconnected to the surrounding cycle network. East Street is also currently not wide enough to provide a bicycle path that is compliant with AS2890 and may compromise the safety and amenity of this cycle route.
- The use of Barnstaple Road as a secondary construction vehicle route is inappropriate as it uses roads that are narrow and residential, including Second Street, Waterview Street and Ingham Street.
- The construction route indicated along Lyons Road West and Harris Road is constrained by the size of the roundabout at the intersection of Lyons Road West and Harris Road. This requires Sydney Metro West to reconsider an alternate appropriate route for construction vehicles.
- The construction traffic management arrangements for services at St Albans church should be extended to cover the Sunshine childcare centre during weekday due to the equivalent levels of traffic congestion during weekday peaks.
- Council has recently completed Stage two of Five Dock streetscape upgrade along Great North Road in the vicinity of Metro station. Following the consultation with Sydney Metro, it was agreed that Council was to exclude the streetscape works fronting the station as well as intersection of Great North Road and Waterview Street and Sydney Metro would complete the streetscape works as part of the station public domain works. Council requests that Sydney Metro follow Council's streetscape design to complete the remaining streetscape works in these locations.

Flooding and hydrology

The following issues have been identified regarding flooding and hydrology at Five Dock Station (more general comments relating to the flooding and hydrology assessment are detailed in Section 16):

- Flood model inputs for Five Dock assume that the station box is blocked from floodwater as part of the baseline conditions. It is not clear why this assumption has

been adopted or why a flood study on the existing condition was not undertaken. Five Dock is generally low-lying which makes the flood impact difficult to interpret on the basis of the baseline scenario only, particularly with respect to diversion and concentrated flows.

- Five dock generally has a number of known hot-spot issues with regard to stormwater and flooding and would benefit from an existing conditions flood analysis to provide better context for the baseline and proposal scenarios.
- Hazard maps for Five Dock shows several locations where the hazard increases directly from H1 to H5. This would be characteristic of flood levels that would overtop existing kerbs in the precinct and should be identified as an impact.
- Flood mapping for Five Dock Station starts exactly at the station box boundary and does not appear to account for upstream flows.

Recommendations

- The Critical State Significant Infrastructure application should be subject to an appropriate condition that requires the detailed design of the Fred Kelly Place extension in Five Dock to be prepared in close liaison with the City of Canada Bay. Consideration should be required to be given to creating a seamless pedestrian experience that integrates with the existing Fred Kelly Place through the use of consistent levels, planting, seating, amenities (playground and public toilet) and type and detail of paving and other details of external areas.
- The Critical State Significant Infrastructure application and EIS should be revised to include detail of station buildings and service buildings, including building height in metres or RLs and ground level setbacks from boundaries and upper level setbacks where proposed.
- The Critical State Significant infrastructure application should be revised to ensure that the proposed building envelope to the north of Fred Kelly Place does not create any additional overshadowing to that contemplated by the *Canada Bay Development Control Plan*.
- Five Dock Library is an appropriate location for the promotion of Metro's 1800 phone number. Library Staff will refer the community to directly contact Sydney Metro about concerns and feedback relating to Sydney Metro. This way, issues are responded to immediately by Sydney Metro West, without requiring Council as an intermediary.
- The engagement of a Noise Advisor, Acoustic and Noise Program, and Construction Working Hours as specified within the Conditions of Consent issued for Stage 1, must continue to apply to all works associated with construction of stations, precincts and ancillary structure.
- A more suitable location for the bicycle parking should be identified that will not impact on the visual amenity of St Albans church.

- Heritage interpretation devices should be “low key” in the vicinity of St Albans church to ensure that they do not visually dominate the space, or St Albans Church.
- The “sensitive design interface” shown in per Figure 12-6 should be extended to cover the whole of the façade facing St Albans Church and its grounds.
- Sydney Metro should liaise with the City of Canada Bay Council with a view to making a contribution towards the provision of car parking in the Five Dock Town Centre to offset the lack of parking for non-station uses and the reduction in on-street parking.
- Suitable conditions should be imposed to ensure that space for loading/unloading and other service vehicles is provided for each metro station so as to minimise impact on the public domain and the operation of surrounding streets.
- The location of kiss-and-ride zones should be re-evaluated to be closer to the station and to ensure that they are located in streets that have sufficient width and mid-block capacity to accommodate the pick-up and drop-off demand. The opportunity to relocate some kiss-and-ride zones to the location of the existing bus zone on Great North Road between Garfield Street and the existing pedestrian crossing should be considered in further planning for the station precinct.
- The cross section of East Street should be re-evaluated in further planning of the station precinct to allow for a continuous cycle connection to Henry Street and to manage the likely demand for pick-up and drop-off activity at the end of East Street. A Road Safety Audit should be undertaken to determine the suitability of East Street for a cycle connection.
- The suitability of Second Street, Waterview Street and Ingham Road as construction vehicle routes should be re-evaluated due to their width and residential nature.
- The suitability of Lyons Road West and Harris Road as construction vehicle routes should be re-evaluated due to the geometric constraints of the roundabout at the intersection of these two roads.
- The Critical State Significant Infrastructure application be subject to an appropriate condition that requires the upgrade of the public domain immediately surrounding the metro station to be undertaken by Sydney Metro and the upgrade is to be consistent with the City of Canada Bay Council’s streetscape design.
- Baseline flood modelling need to be updated to accurately reflect existing conditions and remove the assumption that the station box is blocked from floodwater as part of the baseline conditions.
- Further mitigation detail should be provided for reductions in flood storage, blocking of drainage and evacuation of workers during flood events.
- Further design work should be undertaken to reduce the increase in flood levels around the precinct which current modelling indicates would have an adverse impact on residents in the precinct and reduce flood depth that would overtop existing kerbs.

11. PROPOSAL WIDE IMPACTS (CHAPTER 18)

The following issues have been identified in relation to Chapter 18 Proposal Wide Impacts.

Waste Management

- There is insufficient detail regarding the management of waste during the operation of the proposal, with the majority of the focus of waste management plans being on management of construction waste. Council's view is that the commitment to follow the waste hierarchy should be extended beyond construction phases to the operation of the proposal. This should include the preparation of operational waste management plans to show what waste will be generated by the proposal, where bins will be located and stored and how service access will be provided to collect them.

Recommendations

- The waste management plan should be extended to provide more details around waste generation, storage and collection during operation of the proposal.
- A more detailed breakdown of the waste generation totals should be provided to show the total amount of waste in each stream as well as details regarding the temporary storage transport and destination of construction waste to ensure that community impacts are minimised.

12. OVERARCHING COMMUNITY COMMUNICATIONS STRATEGY (APPENDIX C)

The following issues have been identified in relation to Appendix C Overarching Community Communications Strategy.

- The radius of 100m and 200m for day and night works notifications is considered too small for the community and should apply to any local road traffic impacts.
- The timeframe for issuing notification letter should factor in the time for delivery and should be received at least 7 days prior to works being undertaken.
- Further clarification is sought regarding the print distribution and timelines for the project newsletters.

Recommendations

- The overarching communication Strategy be updated to:
    - Extend the radius of notifications for works from 100m to 200m and from 200m to 400m for day and night works respectively.
    - Change the timeframe for notification letters from “sent at least 7 days prior to works” to “delivered 7 days prior to works”

13. ENVIRONMENTAL RISK ANALYSIS RESULTS (APPENDIX J)

The following issues have been identified in relation to Appendix J Environmental Risk Analysis.

- Whilst greenhouse gas emissions are considered in the environmental risk analysis, there are no specific references to relevant policies or quantified assessment of the carbon impact of the project during construction and operation compared to a Business as Usual scenario. No carbon accounting is provided in Appendix J risk analysis or in the specific chapters for each station. This contrasts with the assessment for other aspects of the proposal for which a baseline assessment is presented along with changes proposed.
- Specific climatic risks such as flooding are considered, however there is no comprehensive and strategic climate risk assessment in line with the guidance from Task Force on Climate Related Financial Disclosures (TCFD) and NSW Treasury.
- Only cementitious materials are specifically mentioned as source of emissions of greenhouse gases from embodied energy in construction materials. There is no quantification of the materials to be used in the proposal, and their embodied carbon and energy. A full assessment would typically include other key products and their embodied energy and carbon (e.g., steel, aluminium and other bulk materials).
- The assessment of the proposal omits risks associated with sourcing certain materials due to supply chain constraints. There is a significant opportunity for such a large-scale project to generate demand for locally sourced materials that generate demand for circular economy products and services that have not been accounted for in the assessment.
- The proposal does not provide any commitment to an Infrastructure Sustainability Council of Australia (ISCA) rating for the project nor to achieve a leading score for sustainability. This contrasts with other leading infrastructure projects including those in NSW that do have an ISCA rating. The ISCA rating sets out four criteria including Governance, Economic, Environment and Social. Within the Environment criteria, the ISCA requires projects to achieve resource efficiency, innovation, sustainable procurement, and the like.

Recommendations

- The assessment of the proposal should be revised to provide carbon assessment and accounting for baseline, business as usual (BAU) projection, construction phase and operation phase scenarios, in line with NSW Climate Change Policy Framework and Net Zero Plan Stage 1 2020-2030 Implementation Update.
- The proposal should commit to publishing statements on climate change impacts, risks and adaptation for the Metro every two years. These statements would identify and address the impacts, risks and opportunities at the proposal-wide level across the station precincts and ancillary facilities, although it is recognised there may be

differences in consequence and likelihood of potential risks at different locations. This should be consistent with the international Task Force on Climate-Related Financial Disclosures (TCFD) recommendations and other relevant international guidance or standards and should be peer reviewed by an appropriately qualified authority, such as an auditor.

- The assessment should include a quantified assessment of materials to be used in the project, their embodied energy and carbon and articulate how the sustainable procurement plan will deliver leading practice in low carbon, low embodied energy materials.
- The assessment of the proposal should be revised to include a quantified circular economy assessment of materials. This should identify risks and opportunities associated with BAU sourcing compared to circular economy sourcing, in line with the NSW Circular Economy Policy.
- The proposal should include a commitment to an ISCA rating for all stages of the project. This commitment to achieve a leading ISCA rating score should match or exceeding other ISCA certified projects, such as the Bexley North and Petersham station upgrades, which achieved scores in excess of 90.

14. TRANSPORT (TECHNICAL PAPER 1&2)

In addition to station specific comments regarding transport at each precinct, the following issues have been identified in relation to Technical Paper 1 and 2 Transport.

- The forecasting of passenger demand by arrival modes has been used as the basis for determining the infrastructure requirements at each station to ensure that the stations and their surrounds operate at a satisfactory Level of Service. These forecasts derived from PTPM indicate significant shares of patronage arriving and departing from stations via park and ride (between 7 and 11 per cent), which would amount to additional parking demand of some 200-400 vehicles in areas where parking is already heavily constrained.
- The assessment of parking impacts focuses solely on any loss of existing on-street parking and doesn't consider the additional impact of increased parking demand generated by park-and-ride trips to the stations nor intensification of development around the stations. This demand is likely to lead to increased illegal parking in station precincts where no mitigation to these demands has been provided beyond broad motherhood statements alluding to non-specific measures to address increased parking demand.
- Where parking demand is constrained (specifically around North Strathfield and Concord Oval (Burwood North) stations), it is likely that constrained parking conditions would push customers away from using park-and-ride and towards other transport options such as walking and cycling. This is likely to mean that the provisions shown for cycling and walking are inadequate.
- The Level of Service for pedestrians has been based on outdated performance standards (Fruin, 2971), while relevant for station platforms and concourse areas, are no longer appropriate for outdoor facilities such as footpaths and shared paths. *Walking Space Guide (Transport for NSW, 2020)* is the current guidance for the design of walking spaces on streets and provides the following commentary on the use of Fruin Levels of Service in NSW:

  "Fruin supported development of local standards to suit local social norms (United States of America). This guide is calibrated to Australian urban norms which are different from those more recently developed for London for example. Relatively, Australians have a clear preference for more space."

  Consequently, the pedestrian analysis presented in the EIS is likely to underestimate the impacts of the proposal on surrounding footpaths and walkways, particularly around stations within City of Canada Bay Council where footpath widths are generally in the region of 1m.
- Discussion of the integration of Sydney Metro West with the surrounding public transport network has been largely limited to the specification of bus stops, layover space and pedestrian crossings. The EIS document does not provide any documentation of how the frequency and coverage of bus services will change to

respond to the new public transport demand created by the stations and development uplift that accompanies them. This reconfiguration of bus services is fundamental to maximising the catchment of each station and supporting urban renewal that is occurring in and around the station precincts.

- As a general principle, it is Council's understanding that the proposal would use State Roads for construction haulage where possible, as these uses will cause damage to local road pavements. Inadequate information has been provided within the CSSI relating to this.
- Up to 100 existing local car parking spots will be lost across the local government area as result of Sydney Metro West. This loss represents significant disruption to local businesses and residents, if not mitigated. Car parking spots are an economic asset to local businesses, the community and Council and play a complementary role to other types of transport infrastructure. Financial compensation is requested from Sydney Metro West to alleviate the negative externalities of this loss. The compensation would be utilised by Council to provide alternate car parking arrangements and spaces.
- Council's *Five Dock Town Centre Urban Design Study 2013* identified the upgrade of the existing Kings Road Car Park into a three-storey car park for non-commuter purposes, in support of town centre visitor parking. This car park represents an opportunity within the immediate vicinity of the future Five Dock station in alleviating losses of local car parking.
- Council has instigated the potential provision of car parking stations within close proximity of Metro stations. However, any plans for such would be long term 10+ year eventuation. Therefore, interim transitional car parking plans need to be implemented in collaboration with Council.
- The Conditions of Consent to EIS stage 1 required the preparation of a Construction Parking Strategy. However, already at station box excavation stage, local businesses have experienced a reduction in available parking for customers within the vicinity of construction sites. It is pertinent that this issue be closely rectified as a matter of priority and be continually monitored.

Recommendations

- More detailed parking demand management plans are required to address the significant increase in parking demand, that is anticipated as a result of the increased park-and-ride travel demand as the station precincts already experience issues with constrained supply of on-street parking.
- The adequacy of footpaths surrounding the stations should be re-evaluated against the standards for footpath design as outlined in the Walking Space Guide (*Transport for NSW, 2020*) as Fruin Level of Service is no longer accepted for this purpose.
- More detailed documentation of the assumptions in bus network frequency and route changes required to realise the forecast patronage should be provided to ensure that these services are delivered upon opening of Sydney Metro West.

- Sydney Metro should undertake condition assessments for pavements and bridges on local roads used for construction haulage to determine their condition before and after construction and used as the basis for compensation to Council for any decline in the structural integrity of these assets.
- Construction parking by Sydney Metro West contractors has not adhered to the agreement made with Council in relation to management of weekday, weeknight and weekend car parking. This needs to be resolved as a matter of priority as businesses and community are experiencing parking issues. It is requested that the CSSI application associated with Stage 3 EIS continue to apply an appropriate condition that requires construction worked parking to be provided to limit impact on local streets.
- Financial contribution is sought from Sydney Metro West, in relation to the loss of local parking which services local businesses. The negative externality related to loss of parking is significant. It can be assumed that with a one-hour per car spot turnover of customers. It is equivalent to a loss of 7 customers per day per car spot. Over the course of 375 days per week, this is a matter for further planning and compensation provisions. It is requested that an agreement be put in place between Sydney Metro West and CCB in relation to a parking mitigation and compensation agreement.
- Where Sydney Metro West is unable to provide parking to meet the demands of non-station uses and where Metro West works will reduce the number of parking spaces on local streets, it is requested that Sydney Metro West make a financial contribution to Council for the purpose of providing car parking in the Five Dock town centre (the construction of Kings Road Car Park).
- A transitional car parking plan for local businesses should be prepared to ensure local businesses are supported through each phase of construction, and business viability will not be affected.
- That the CSSI be subject to a condition that requires the *Metro West Construction Parking Strategy* be updated to implement measures to mitigate impact on on-street parking for land within immediate vicinity of construction sites.
- It is requested that Sydney Metro West undertake further analysis identifying the future demand for active transport uses in getting to and from the station. In particular, the number of bicycle parking spaces undercover, the width of pedestrian paths and circulation space for pedestrian movements.

15. LANDSCAPE AND VISUAL AMENITY (TECHNICAL PAPER 6)

In addition to station specific comments regarding landscape and visual amenity at each precinct, the following issues have been identified in relation to Technical Paper 6 Landscape and Visual Amenity.

- The Sydney Metro West – Concepts and Stage 1 application was subject to the following conditions of approval:

  C-B8 As many trees as practicable must be retained. In addition, within ten (10) years of the date of this approval or no later than the commencement of operation of the CSSI (whichever is earlier) there must be a net increase in the number of mature trees provided at a ratio of 2:1.

  C-B9 The CSSI must result in an increase in tree canopy coverage.

  Despite these conditions, it is apparent that the subject application will result in a significant reduction in trees in North Strathfield and there is no certainty that there will be an increase in tree canopy coverage in either the Concord Oval (Burwood North) or Five Dock station precincts. There is a general lack of detail provided as part of the station descriptions and the specifics of landscaping and visual amenity mitigation to be provided at each station.

Recommendations

- A suitable condition should be imposed that requires:
  - A plan to be prepared that illustrates the location and inventory of all trees proposed to be removed; and
  - A plan to be prepared that illustrates the location and inventory of all replacement trees to be planted. This plan should demonstrate how the project will provide an increase in the number of mature of trees to a ratio of 2:1 and result in a net increase in tree canopy coverage over a 9 or 10 year period.
- Large canopy trees should be specified to replace lost canopy. Replacement street trees should be spaced 6-8 m apart depending on mature tree size. The specific tree species to be used as replacements should be discussed with Council
- Soil volumes should be provided for healthy trees; i.e., 30m^3 of soil per medium size tree. If this soil volume cannot be met, designs are to include StrataVault and structural soil under roads and pavements.
- Station designs should take advantage of the opportunities to provide green wall and/or trellises with vines as greenery incorporated into station structures to break up the visual appearance and impacts of these building.

16. HYDROLOGY, FLOODING & WATER QUALITY (TECHNICAL PAPER 8)

In addition to station specific comments regarding flooding and hydrology at each precinct, the following issues have been identified in Technical Paper 8.

The hydrology and flooding assessment has not provided the flood risk hazard classification in accordance with Section C7.3, Control C7 of Part C – General Controls of the *Canada Bay Development Control Plan*, which used the following categories:

> *A "High Flood Risk" Precinct is an area of land that under 1%AEP conditions is either subject to a high hydraulic hazard or presents significant evaluation difficulties.*
>
> *A "Medium Flood Risk Precincty is an area of land hat under 1%AEP conditions is not subject to a high hydraulic hazard and presents less than significant evacuation difficulties.*
>
> *A "Low Flood Risk" Precinct is an area above the 100 year flood and includes all area up to and including the "Propellable Maximum Flood (PMF)"*

The current hazard classification used in the hydrology and flooding assessment does not clearly demonstrate the change in flooding risk from the proposal in terms that are meaningful to Council's flood planning policy.

- The adopted modelling approach of combining hydrology and hydraulics within the same model ("rainfall on the grid") is generally acceptable to Council, however the topography of City of Canada Bay Council is varied, particularly in Five Dock. Further clarification is sought regarding the decision not to use separate hydrological models to derive inflow hydrographs and how the rainfall on the grid or derived hydrographs are used in the flood modelling.
- There are several impacts identified throughout the assessment where increases in flood levels are above desirable levels but are treated as not significant or not adverse. The definition of acceptable level of impact has not been clearly defined; it is Council's understanding that there should be no increase in flooding impact as a result of the proposal.
- The EIS does not provide sufficient information regarding the design of water quality and drainage infrastructure to adequately determine whether flooding impacts have been satisfactorily mitigated.
- It is unclear from the EIS whether water quality mitigation and monitoring plans have been developed in consultation with Water Quality Australia; it is Council's expectation that this consultation would be undertaken prior to release of the EIS.
- Clarification is sought regarding the specific use of the following variables in sensitivity modelling:
  - Rainfall intensity and sea-level rise due to climate change: these should be modelled as separable variables

  - Roughness sensitivity:
  - Variation in drainage blockages: blockages as per ARR2019 should be considered in the specification of drainage infrastructure.

- Clarification is sought regarding:
  - the overall level used in AHD for sea-level rise.
  - the assumed rainfall uplift of 21.3%. It is unclear from the EIS why this specific value was selected and why a range of values was not used to test the sensitivity of flood outcomes to this variable.
  - whether the Concord West Flood Study (Jacobs, 2015) has been used as the basis for flood modelling assumptions, specifically for North Strathfield station.
  - Whether any streamflow data was used in the study.
- Groundwater impacts from the WestConnex project resulted in significant costs to Council and are likely to be repeated for this proposal if groundwater impacts are not well identified and mitigated. The first EIS have not addressed the groundwater impacts on Council's assets.
- Stormwater discharges to Council drainage system as a result of the proposal have not been identified.
- The discharge of groundwater into the Council's stormwater system will reduce the capacity of the system and increase the risks of flooding. Station box groundwater systems that are connected to the tunnel groundwater drainage would mitigate this risk.
- The following are hydrology and flooding matters specific to North Strathfield Station, in addition to those already addressed in Section 8 of this submission:
  - Regarding Part (d) of the SEARs requirements for construction flooding impacts, further clarity is required on what would constitute a significant variation on flood hazard, and what contingencies would be in place to allow workers to evacuate to a safe zone during a flood event.
  - For Part (b) of the SEARs requirements for operation flooding impacts, flood mitigation measures will be required as the increase would cause adverse impact on the affected residents and property owners. Also the minimum freeboard of 300mm is not met for Waratah Street and this location does not meet the requirements of the SEARs.
  - The flood report fails to provide flood velocity plots to verify the information shown in flood hazards map, Figure A-22 in the precinct. Additionally, this figure shows the flood extent as cut off from a known drainage warning area downstream of the precinct, whereas upstream works would have impacts on the flow distribution into this drainage warning area.
- The following are hydrology and flooding matters specific to Concord Oval (Burwood North) Station, in addition to those addressed in Section 9 of this submission:

- In accordance with the *Canada Bay Development Control Plan*, the properties fronting Burton Street will be required to obtain an easement over the Concord Oval (Burwood North) site to drain their surface stormwater flow to a legal point of stormwater discharge.
- The reported hazard levels only show the change in hazard from the baseline scenario to the proposal scenario and do not place these impacts in the context of existing flood conditions.
- Part (d) of the SEARs requirements for operational flooding impacts identifies flow depths that would be likely to overtop existing kerbs, however this has not been addressed in the assessment of flood impacts.

Recommendations

- Flood modelling and station precinct design should be reassessed on the basis of revised flood modelling that takes into account the following:
  - Existing flooding conditions in addition to the assumed baseline scenario
  - Rainfall intensity and sea-level rise due to climate change as separate variables
  - Roughness sensitivity
  - Variation in drainage blockages: blockages as per ARR2019 should be considered in the specification of drainage infrastructure.
  - Reports flood hazards in line with the *Canada Bay Development Control Plan* flood risk hazard levels
- The station precinct designs should be amended to eliminate any adverse impact (i.e., no rise in flood level as a result of the proposal).
- In cases where no flood information or previous flood study has been undertaken (e.g., Five Dock) a pre-flood analysis of existing conditions should be undertaken to validate the baseline scenario.
- The results of and revised modelling to address these factors, along with the modelling should be provided to Council for review prior to approval of construction.
- Further detail of flood levels around station precinct should be provided that include flow velocity plots and tabular *V*D* values for areas of concern around each station box and also to extend further into flood risk areas than currently shown in the EIS.
- Council should be included in any groundwater investigations and act as an approval authority for any investigations and works that will impact groundwater.
- Further work is required to identify the stormwater drainage to Council's drainage system. A condition should be placed on the proposal for an approval under Section 68 of the *Local Government Act 1993* prior to the completion of stormwater drainage design.

- The station groundwater discharge should drain to the tunnel groundwater drainage system and not into Council's stormwater systems.
- Additional recommendations relating to hydrology and flooding at North Strathfield Station:
    - Further mitigation detail needs to be provided for reductions in flood storage, blocking of drainage and evacuation of workers and people during flood events.
    - Plots of 1%, and 5% AEP, PMF and flood velocity should extend to show more of Queen Street and Beronga Street north of the station box.
    - Further design work needs to be undertaken to reduce the increase in flood levels around the precinct which current modelling indicates would have an adverse impact on residents in the precinct and reduce the flood impact at the Wellbank Street- Queen Street intersection and Queen Street-Beronga Street intersections due to post development flow distribution.
    - A review of the existing public stormwater drainage system is to be evaluated and upgraded.
- Additional recommendations relating to hydrology and flooding at Concord Oval (Burwood Road) Station:
    - Properties along Burton Street will be required to obtain an easement over the Concord Oval (Burwood North) site to drain their surface stormwater flow to a legal point of stormwater discharge, in accordance with the Canada Bay DCP.
    - Information and data have not been provided in relation to existing flood conditions, and only show the change in hazard levels, in order to determine full flooding impacts
    - The assessment of flood levels have not been adequately undertaken despite flooding maps showing water levels to be above kerb levels.

17. SOCIAL IMPACTS (TECHNICAL PAPER 9)

The following issues have been identified in relation to Technical Paper 9 Social Impacts:

- The area around Concord Oval (North Burwood) station has approximately 16% of residents that are not fluent in English and would benefit from community engagement materials translated into relevant languages.

Recommendations

- Identify Concord Oval (North Burwood) as an area with linguistic diversity and ensure that community engagement materials are translated into the relevant languages.