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Project No.: P00577

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Dear Amy,

2 Fitzwilliam St, Parramatta – Response to TfNSW RFI

This letter has been prepared on behalf of the UPG Fitzwilliam Pty Ltd (UPG) in response Transport for NSW's (TfNSW) request for information (RFI) following exhibition of SSD-79791208 for the development at 2 Fitzwilliam St, Parramatta (the Site). The RFI specifically relates to the New Cumberland Line (NCL) rail corridor which is proposed to traverse below the Site.

It is acknowledged that the NCL remains in a strategic planning phase and has not been formally gazetted. At the time of writing there is no publicly available noise / vibration assessment or environmental impact statement (EIS) for the proposed NCL that confirms the track (attenuated / highly attenuated) beneath the Site. The material released by TfNSW is limited to strategic corridor protection and business-case work and does not specify whether attenuated or highly attenuated track will be adopted in this location.

It is noted that recent rail tunnel projects have received SEARs from the Secretary of the Department of Planning which explicitly require proponents to minimise adverse noise and vibration impacts on the surrounding community. On this basis, it is reasonable to expect that any future approval for the NCL would include similar obligations, and it is highly unlikely that an exemption or reduced level of acoustic protection would be applied to this Site.

Importantly, there is also no confirmation as to whether the future corridor will be used by heavy rail or metro rolling stock, nor any indication of timing as to when the line might be gazetted or delivered. In these circumstances, it is not reasonable or practical for the development to attempt to accommodate potential impacts from an undefined, unconfirmed and unscheduled rail project. Any future impacts should be addressed at the source through the design of the NCL infrastructure itself, including the attenuation performance of the track system and tunnel structure, consistent with established practice for all major rail projects in Sydney.

Comparable rail infrastructure in sensitive CBD and mixed-use environments in Sydney routinely adopts attenuated or highly attenuated tracks.

These include:

- Sydney Metro Northwest and City & Southwest, where floating slab track, mass-spring systems and high-resilience fasteners are applied beneath residential towers, hotel uses and vibration-sensitive facilities.
- Existing suburban rail corridors through the Sydney CBD, where resilient fasteners and slab track forms are used to control regenerated noise within high-rise buildings.
- Sydney Metro West, which applies highly attenuated track through Parramatta, the CBD and other zones with residential, educational or hotel uses directly above tunnels.

These precedents demonstrate that TfNSW consistently implements enhanced track attenuation where rail passes beneath high-density residential, hotel, healthcare, education or mixed-use towers.

In the absence of a released track specification for the NCL, it is reasonable and conservative to assume that attenuated or highly attenuated tracks would be required beneath the Site, consistent with established practice elsewhere in the Sydney CBD and Parramatta.

This assumption is required to address TfNSW's noise and vibration RFI and does not represent a confirmed rail design decision by TfNSW, rather, it reflects established practice for underground rail infrastructure in high-density urban settings.

With respect to construction-related vibration, the NCL has no confirmed delivery schedule, design release, procurement program or committed construction timeframe. Based on all publicly available information, rail construction beneath the Site is not imminent, and the proposed building will be completed well in advance of any future tunnel works.

A meeting was held with TfNSW and their engineers, WSP, in November 2025, and it was agreed that it was highly likely that 2 Fitzwilliam St, Parramatta (the Site) would be completed prior to works commencing on the NCL. As a result, any assessment would be completed on this basis.

We also note that the Concept SSDA (SSD-49808717), along with an early works DA (DA/392/2024), has already been approved for the Site. The approach adopted for the current SSD-79791208 Noise and Vibration Impact Assessment is consistent with the planning framework established under that approval and reflects the information reasonably available at the time of reporting.

Any future detailed rail design released by TfNSW is expected to include attenuated track in tunnel segments passing directly beneath sensitive developments, consistent with established practice in the Sydney CBD and Parramatta.

This letter shall not be construed as relieving any other party of their responsibility.

If you have any questions, please don't hesitate to contact the undersigned.

Kind Regards,

E-LAB Consulting



Brandon Notaras | Director

Acoustics & Vibration