

Secretary
Department of Planning and Environment
4 Parramatta Square,
12 Darcy Street,
PARRAMATTA NSW 2150

4 May 2022

Dear Sir / Madam

SSI 22765520 - Sydney Metro West – EIS for Rail Infrastructure, Stations, Precincts and Operations – SOPA Submission

Thank you for the opportunity to review and comment on the Environmental Impact Statement 3 (EIS 3), prepared by Sydney Metro, for rail infrastructure, stations, precincts and operations as referenced above.

Introduction

Sydney Olympic Park Authority (SOPA) supports the establishment of the Metro station in the Sydney Olympic Park town centre and welcomes the significant precinct improvement in terms of accessibility that the station will bring to residents, workers and visitors to Sydney Olympic Park. SOPA also strongly supports the aspirations in the report that *“The broader Sydney Olympic Park metro station precinct is proposed to be a thriving urban centre with a vibrant mix of homes and jobs, as well as a premier destination for cultural, entertainment, recreational and sporting events”*.

Alignment with the SOPA Master Plan 2030 (Interim Metro Review)

SOPA and Sydney Metro have worked in collaboration for a number of years to develop the most effective station design set amongst a vibrant green urban centre. The culmination of this work was the Sydney Olympic Park (SOP) Master Plan 2030 (Interim Metro Review) which SOPA submitted to the Department of Planning and Environment (DPE) in August 2021. Currently the Interim Metro Review is well advanced in the assessment process.

SOPA consider that the EIS 3 is well aligned with the SOP Interim Metro Review reflecting the agreed position between SOPA and Sydney Metro for many of the key items.

Sydney Olympic Park Vision & Strategy 2050 and the Master Plan 2050

SOPA is also currently developing the Sydney Olympic Park Vision & Strategy 2050, and Master Plan 2050. SOPA will further involve Sydney Metro in the formulation of these strategic documents to ensure that the delivery of the new Metro has a profound positive impact across the entirety of Sydney Olympic Park.

Sydney Metro Design Review Process

As reflected in the SOP Interim Metro Review, the Metro over station development will not be required to follow the SOPA Design Excellence Policy and associated processes and will instead be required to undergo ongoing review with the NSW Government Architect, State Design Review Panel. However, given that these buildings will be located in the heart of the Sydney Olympic Park town centre, SOPA requests full active representation on the State

Design Review Panel to ensure the unique requirements of the precinct is considered, including events and the emerging residential areas.

Sustainability

The Metro west commitment to Sustainability is welcomed as noted in Appendix E Design Guidelines “*Stations and associated precinct developments are to achieve a high level of sustainability performance using the Green Building Council of Australia Buildings Green Star Tool and other sustainability tools (such as NABERS, the Infrastructure Sustainability Council’s (ISC) rating scheme and BASIX) for relevant sites*”.

Sydney Olympic Park is a 6 Star Green Star Community certified by the Green Building Council of Australia in 2019. The required environmental ratings as per Section 4.2 of Master Plan 2030 (2018 Review) apply to the Metro sites with the addition of the following for Mixed Use buildings for design competition sites (as outlined in the SOP Interim Metro Review):

- Minimum 5 Star Green Star rating from the Green Building Council of Australia; and/or
- Demonstration of world’s best practice sustainable building design and as-built using an alternative rating tool such as WELL, Living Building Challenge, or other recognised rating scheme can be negotiated with SOPA.

Evidence of registration and certification of any of the above rating tools will be required to be submitted to SOPA and a condition to this effect is recommended as attached.

Site 46 Deferral

Pursuant to discussions with DPE during the SOP Interim Metro Review development, SOPA has deferred a small part of the Metro site, being that portion of Site 46 within the Metro landholding. The narrow site presented a number of challenges. Therefore, deferring the site for a full review in the 2050 Master Plan will allow the whole of site 46 to be developed in the future in a cohesive manner that will result in urban design and site efficiency outcomes. Sydney Metro is aware of this amendment, however given the timing of both reports, the EIS does not reflect this late change.

SOPA requests that DPE do not approve the EIS concept for site 46 at this stage for the above reasons.

State Abattoir Heritage Precinct

The EIS, including Technical Paper 5 and 6, details the significance of the impact of the proposed Metro development on the State Abattoir Heritage Precinct. The interface between, and possible enhancement of, the Abattoir Precinct will be the outcome of detailed design development and as would be expected, is not included in the EIS at this stage. However, SOPA considers that the interface and integration of the northern station building, Central Urban Park and connecting pedestrian paths warrants the introduction of a “sensitive design interface” overlay, as used by Sydney Metro for other stations including Five Dock, The Bays, Pyrmont, Hunter Street Metro stations. The EIS uses the “sensitive design interface” mapping overlay to require future detailed designs to provide a contextually sensitive interface with heritage precincts/building through architectural treatments and strategies.

SOPA requests that DPE require Sydney Metro to include a “sensitive design interface” for the northern part of the Metro site opposite the State Abattoir Heritage Precinct, comprising the northern portion of the northern station building, Central Urban Park and connecting paths. This will ensure that at the future detailed design stage of Sydney Olympic Park Metro station, the heritage context and architectural design interface will be thoroughly considered resulting in a design which enhances and respond to the adjacent heritage precinct.

Metro Station Entries

As indicated, SOPA has worked in collaboration with Sydney Metro to develop the proposed station and precinct. SOPA considers that extensive activation and pedestrian permeability are key objectives for the emerging town centre, focused around the Metro station.

SOPA does not support the dedication of 2 of the 4 station entries on the plaza as 'event only' as this would render this space inactive a large proportion of the time. To make the station permeable, all entries need to be available in everyday mode, with the entries from Transit Plaza becoming available to event-goers during event mode and the everyday promenade entrances available to residents and workers only in event mode. It is also important to have these entries operating during everyday mode to provide a strong visual connection to the station and the town centre from Olympic Boulevard west and the rest of the precinct to the east. The Interim Metro Review has strived to make the Central Precinct more activated, fine-grained, providing shorter travel distances/sight for pedestrians and to improve legibility and wayfinding. All entries need to be open and active every day.

Northern Station Building – Rooftop Publicly Accessible Open Space

Sydney Olympic Park’s draft Vision & Strategy 2050 is encapsulated in a precinct that: puts Country first and is nature positive, ‘energises’ the everyday and is a place where Sydney comes to play. The Metro station at the heart of urban core will become the active and vibrant town centre.

The Interim Metro Review includes the concept of a publicly accessible open space on the northern station building and builds on this with a conceptual design as part of the Place Design and Public Domain Framework (Appendix 3 to SOPA Interim Metro Review). SOPA considers this to be an important public domain element given the unique Sydney Olympic Park location and characteristics.

SOPA and Sydney Metro were aligned during the development of the Interim Metro Review with the rooftop of the northern station building comprising a publicly accessible open space. The benefits of this design element include assisting the northern station building to recede into the landscape and adjoining Central Urban Park, provide another type of public open space for enjoyment by residents, visitors and workers, and to add to the pleasant outlook from surrounding tower buildings.

The EIS does not make reference, or illustrate on the Figures, the publicly accessible open space on the rooftop of the northern station building as agreed in principle between SOPA and Sydney Metro. It is recommended that DPE require Sydney Metro to include the publicly accessible open space on the northern station building at the next step in the design development. A recommended condition of consent has been included which addresses this item.

Construction Transport Route

The proposed vehicle construction route in the EIS is not aligned with the approved heavy vehicle route approved under the Traffic Management Plan for Stage 1 Construction (tunnelling and station box) which is already underway. It is critical that this is resolved to protect the amenity of residents at SOP who will experience an extended period of construction and traffic noise.

The heavy vehicle route should reflect the approved construction route already being used. All impacts resulting from this route change need to be reassessed such as traffic impacts and noise and vibration.

Recommended Conditions of Consent

Please find attached recommended conditions of consent with regards to items such as:

- Construction Environmental Management Plan including:
 - Construction Noise and Vibration Management
 - Erosion and Sediment Control
 - Heritage Management
 - Flora and Fauna Management
 - Soil and Water Management
 - Groundwater / Leachate Management
 - Landfill Gas Risk Management
 - Construction Traffic and Pedestrian Management
- Operational Stormwater Management Plan
- Sustainability
- Landscape Plan
- Tree Protection/preservation
- Public Domain Interface
- Heritage Interpretation Plan
- Work Permits
- Repair of Damage (Roads and Public Domain)

Please contact Vivienne Albin, Senior Manager Planning on 0414 526 383 or at vivienne.albin@sopa.nsw.gov.au if you wish to discuss any of the issues raised above or attached or require further information.

Yours sincerely,



Sally Hamilton

Director, Environment and Planning

ATTACHMENT – SOPA Recommended Conditions of Consent for SSI-22765520 - Metro Stage 3 EIS for Rail Infrastructure, Stations, Precincts and Operations

CONDITIONS TO BE SATISFIED PRIOR TO THE ISSUE OF A CONSTRUCTION CERTIFICATE

Construction Environmental Management Plan

*Prior to the issue of a relevant Construction Certificate, a **Construction Environmental Management Plan (CEMP)** must be prepared to the satisfaction of SOPA Director, Environment and Planning and submitted to the Certifying Authority. The CEMP must address, but not be limited to, the following matters, where relevant:*

- *Hours of work;*
- *24 hour contact details of site manager;*
- *Construction waste management - identifying options for minimising waste; reuse and recycling of materials; the storage, control and removal of construction waste;*
- *Dust control – measures to be implemented to prevent the movement of airborne particles from the site throughout the construction process, and the tracking of material from the site by trucks and other vehicles. This is to include the appropriate use of physical barriers and the dampening of exposed excavated surfaces. The storage and stockpiling areas for material is also to be detailed and covered as required;*
- *External lighting in compliance with AS 4282: 1997 Control of the Obtrusive Effects of Outdoor Lighting;*
- *Hoarding Design- Hoardings must be solid timber hoarding and designed and approved by the Certifying Authority. The material on the hoarding must be approved by SOPA.*

The CEMP must also include sub-plans for the following:

1. **Construction Noise and Vibration Management Plan** - *Prior to the commencement of works, a Construction Noise and Vibration Management Plan (CNVMP) prepared by a suitably qualified person shall be submitted to the Certifier. The CNVMP must address the relevant requirements of the EPA and be prepared in consultation with, and endorsed by SOPA's Director, Environment and Planning. The CNVMP will (but not limited to):*

- (a) be prepared in accordance with the EPA's Draft Construction Noise Guideline;*
- (b) identify nearby sensitive receivers and land uses;*
- (c) identify the noise management levels for the project;*
- (d) identify the construction methodology and equipment to be used and the key sources of noise and vibration;*

(e) include details of all reasonable and feasible management and mitigation measures to be implemented to minimise construction noise and vibration;

(f) address the relevant provisions of Australian Standard 2436-2010 Guide to Noise and Vibration Control on Construction, Demolition and Maintenance Sites;

(g) be consistent with and incorporate all relevant recommendations and noise and vibration mitigation measures outlined in EIS 3 and relevant Technical Reports;

(h) ensure all potentially impacted sensitive receivers, including all residential areas and hotels, are informed by letterbox drops prior to the commencement of construction of the nature of works to be carried out, the expected noise levels and duration, as well as contact details for a construction community liaison officer; and

(i) include a suitable proactive construction noise and vibration monitoring program which aims to ensure the construction noise and vibration criteria in this consent are not exceeded.

2. Erosion and Sediment Control Plan detailing measures to be implemented prior to the commencement of works and be maintained during the period of construction in accordance with the below requirements:

- a) *Control over discharge of stormwater and containment of run-off and pollutants leaving the site must be undertaken through the installation of erosion control devices such as catch drains, energy dissipaters, level spreaders and sediment control devices such as hay bale barriers, filter fences, filter dams and sediment basins.*
- b) *Controls are not to be removed until the site is stable with all bare areas supporting an established vegetative cover. Erosion and sediment control measures are to be designed in accordance with the requirements of the Managing Urban Stormwater: Soils and Construction 4th Edition – Vol. 1 (the “Blue Book”) published by Landcom, 2004.*

3. Heritage Management Plan including measures to:

- a) *Protect the State Abattoir Precinct heritage item from damage;*
- b) *No part of the development works may extend into this precinct; and*
- c) *Monitor and report on vibration impacts to State Abattoir Precinct.*

4. Flora and Fauna Management Plan must include appropriate biosecurity and hygiene measures to minimise the risk of disease organisms, pests and weeds being introduced to Sydney Olympic Park.

5. Soil and Water Management Plan to be implemented throughout the construction phase of the project. This plan is to be developed with regard to the SOPA Policy 13/4 Stormwater Management and Water Sensitive Urban Design, in consultation with SOPA to the satisfaction of the Director, Environment and Planning, and submitted to the Certifying Authority for approval. The plan must be designed such that:

- a) No groundwater or surface water discharges generated during construction are to be discharged to the Northern Water Feature or its associated stormwater drainage network [note: the Northern Water Feature is a freshwater system that is breeding habitat for endangered aquatic fauna (Green and Golden Bell Frogs)]; all groundwater and surface water discharges must be directed to estuarine waterways.
- b) A gypsum flocculent may be added to any sediment basin in accordance with Appendix E of the Blue Book (note that Alum is not to be used as a flocculent to protect natural waterways).

The Stormwater Management Plan must be endorsed by a qualified stormwater engineer prior to commencement of works. A qualified stormwater engineer must inspect implementation of the Plan regularly throughout the project including prior to commencement of earthworks, monthly until the site is stabilised, and within 24 hours of rain events greater than 10mm. Records of any discharges made to SOPA's stormwater drainage network must be provided to SOPA within two days of any discharge.

6. Groundwater / Leachate Management Plan – provide details on any proposed dewatering activities on site, interception of groundwater/leachate and removal of groundwater/leachate when constructing piles for the building foundations;

7. Landfill Gas Risk Management Plan – including identification of environmental, human health and explosion risks associated with emissions and exposure to landfill gas and trace gases during construction works and appropriate preventative and/or action controls and monitoring schedule for during construction works prepared by a suitably qualified person in the field of landfill gas risk management.

8. Construction Traffic and Pedestrian Management Plan (CMP) shall be submitted to and endorsed by SOPA Director, Environment and Planning. The CTPMP shall include, but not be limited to, the following matters which are to be addressed by suitably qualified person(s):

- **Traffic management** - which is to be developed in consultation with SOPA, and is to include:
 - a. ingress and egress of vehicles to the site;
 - b. construction routes to and from the development site;
 - c. number and frequency of vehicles accessing the site;
 - d. the times vehicles are likely to be accessing the site;
 - e. management of loading and unloading of materials;

- f. changes to existing car parking provision as a result of the development;
 - g. management of construction traffic and car parking demand;
 - h. management of existing vehicular and pedestrian movements / routes around the site (if applicable);
 - i. details of special event and clearway conditions on surrounding roads in the vicinity of the site during special events
- **Major event management** – construction traffic management measures during Major Event(s).

The CEMP must not include works that have not been explicitly approved in the development consent. In the event of any inconsistency between the consent and the CEMP, the consent prevails.

The Applicant must submit a copy of the CEMP to SOPA prior to commencement of work. Any changes to the CEMP must be submitted to SOPA for approval three weeks prior to implementation of the changes.

Operational Stormwater Management Plan

Prior to the issue of a Construction Certificate, an operational Stormwater Management Plan (SMP) for post development stormwater disposal and drainage is required, including details of the provision of maintenance of overland flow paths designed to the satisfaction of SOPA Director, Environment and Planning and a copy submitted to the Certifying Authority. All approved details for the disposal of stormwater and drainage are to be implemented in the development.

The SMP must be in accordance with SOPA Policy 13/4 Stormwater Management and Water Sensitive Urban Design, and must include the following information:

- a) all stormwater catchments for the site;
- b) all stormwater drainage system elements for the site including location of the stormwater discharge from the site, long sections for all drainage elements, hydraulic grade line calculations;
- c) all elements of the detention system including sufficient sections, flood freeboards, and details demonstrating how the system operates. The entire site must be included in the detention sizing calculations;
- d) all elements of the stormwater treatment system including sufficient sections and details demonstrating how the system must operate and the diversion flow rate into the treatment system;
- e) details of all stormwater connections to the existing culvert; and
- f) details of the overland flow system and calculations to demonstrate the capacity to safely convey flow through the site including depth x velocity calculations

Note: No groundwater is to be discharged to the Northern Water Feature or its associated stormwater drainage network.

Sustainability

Demonstrated compliance with the required environmental ratings as per Section 4.2 of Master Plan 2030 (2018 Review) with the addition of the following for mixed use buildings within design completion sites:

- *a minimum 5 Star Green Star rating from the Green Building Council of Australia; and/or*
- *Demonstration of world's best practice sustainable building design and as-built using an alternative rating tool such as WELL, Living Building Challenge, or other recognised rating scheme can be negotiated with SOPA.*

Evidence of registration and certification of any of the above rating tools will be required to be submitted to SOPA.

Landscape Plan

Prior to the issue of a relevant Construction Certificate, a detailed Landscape Plan prepared by a suitably qualified person in consultation with SOPA and to the satisfaction of the SOPA Director, Environment and Planning, must be submitted to the Certifying Authority for approval prior to the issue of a relevant Construction Certificate. The plan must include the following:

- a) a publicly accessible open space area integrated with the rooftop of the northern station building with suitable landscaping;*
- b) a detailed design of the central park, plaza areas, promenade and ancillary landscape and public domain areas;*
- c) a materials palette for landscaping infrastructure including pavement and pavement treatments;*
- d) details of outdoor lighting;*
- e) detailed sections showing levels along pedestrian streets;*
- f) the design and materials of landscape furniture, lighting, landscape infrastructure and structures;*
- g) suitable tree and plant species to be used including native species from relevant local vegetation community; and*
- h) details of general maintenance of the landscape areas;*
- i) details of trees to be removed (see below).*

Tree protection/preservation

All existing trees on the site outside the envelope of the proposed buildings are to be preserved where practicable. All such trees being indicated on the required comprehensive landscape design plan and being adequately protected against damage during the building construction period. Any tree removal must be approved by SOPA's Director Environment and Planning.

Plant Species

Plant species identified as weeds in the Greater Sydney Regional Strategic Weed Management Plan 2017 – 2022 (Appendix 1 Priority weeds for the Greater Sydney Local Land Services region, Appendix 2 Other weeds of regional concern) and/or Table 2 of the SOPA Invasive Environmental Weeds Policy POL 10/5 (or any revoking, re-issuing or modifying of such policies) are not permitted.

Public Domain Interface Plan

Prior to the issue of a relevant Construction Certificate, the applicant is to prepare a Public Domain Interface Plan in consultation with SOPA and to the satisfaction of the SOPA Director, Environment and Planning and submitted to the Certifying Authority for approval.

Heritage Interpretation Plan

A detailed Heritage Interpretation Plan is to be developed for Sydney Olympic Park Station (as described in Appendix K of the EIS) in consultation with SOPA and to the satisfaction of SOPA Director, Environment and Planning.

CONDITIONS TO BE SATISFIED DURING CONSTRUCTION

Work Permits - No Obstruction of Public Domain without a Works Permit.

Prior to the commencement of development, if required, the proponent must obtain a Work Permit to occupy the public way, footpaths, road reserves and the like, which must not be obstructed by any mobile cranes, materials, vehicles, refuse, skips or the like, under any circumstances, unless in accordance with the Works Permit.

CONDITIONS TO BE SATISFIED PRIOR TO AN OCCUPATION CERTIFICATE BEING ISSUED

Repair of Damage (Roads and Public Domain)

All public footways, paving, sub-surface infrastructure, kerbs, gutters and road pavement damaged during the works are to be immediately repaired following the damage, to a satisfactory state that provides for safe use by pedestrians and vehicles.

Full restoration of the damage must be carried out to the satisfaction of SOPA's Senior Manager – Engineering Services, prior to the issue of any Occupation Certificate for the development.