

27 May 2021

Jake Shackleton  
A/Director, Infrastructure Management  
4 Parramatta Square  
12 Darcy Street  
Parramatta NSW 2150

Dear Jake,

**RE: CSSI 8285 – Parramatta Light Rail Stage 1, Condition of Approval A9 Request for an alternate timeframe for compliance with Condition of Approval E49 – Operational Noise and Vibration Review Report**

I refer to condition of approval A9 provided for the Parramatta Light Rail Project (Stage 1 also known as CSSI 8285) and provide the following request from our Package 5 contractor (GRCLR) to extend the timeframe required by E49.

For reference CoA E49 requires that:

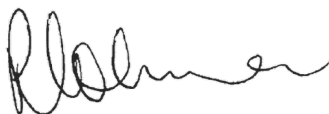
*Noise Mitigation Measures as identified in Condition E48 that will not be physically affected by works must be implemented within eighteen (18) months of the commencement of construction in the vicinity of the impacted receiver to minimise construction noise impacts, and detailed in the Construction Noise and Vibration Management Sub-plan for the CSSI.*

GRCLR is unable to achieve the eighteen-month timeframe required by CoA E49 in all cases and therefore TfNSW, on behalf of GRCLR, is requesting an alternative timeframe from the Secretary under CoA A9 of the CSSI Approval.

Appendices A and B of this letter outline the justification and reasons for this request and the proposed alternative timeframe.

For further enquiries regarding this matter please contact Megan Haberley, Senior Manager, Environment by phone on 0488 442 284 or via email [megan.haberley@transport.nsw.gov.au](mailto:megan.haberley@transport.nsw.gov.au). Thank you.

Yours sincerely,



Poppy Coleman  
Director Safety, Sustainability, Environment and Assurance, CSSPO  
**Transport for NSW**

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# Appendix A

## Detailed Design Iterations

*Extension of time is required to accommodate the detailed design process. The detailed design process included the modelling of predicted operational noise based on initial design, the results of which then feed into the next iteration of design, including proposed mitigation measures that could be built into the design of the PLR infrastructure to reduce predicted noise levels.*

*This process required several iterations to finalise the ONVR, ensuring that through design, operational noise was reduced as far as reasonably practicable without the need for at property treatments and that GRCLR was satisfied that no further in-project mitigation was possible.*

*Some of the aspects of detailed design affecting operational noise are still being refined, including but not limited to:*

- *Trackform (including attenuation);*
- *Track alignment (vertical and horizontal);*
- *Equipment and plant choice; and*
- *Additional in-built mitigation (e.g. TPS acoustic enclosures for air conditioning units and acoustic treatment of Stabling and Maintenance Facility buildings).*

## Commencement of Construction

*Under the CSSI Approval “construction” is defined as including “all works required to construct the CSSI, including commissioning trials of equipment and temporary use of part of the CSSI” excluding “low impact works”. The Approval includes a list of the types of work considered “low impact”.*

*Works started on the PLR Infrastructure package of work in January 2020, under the Construction Environmental Management Plan (CEMP) and sub-plans prepared by TfNSW’s contractor, PCPLR, and approved in November 2019.*

*As there was an approved CEMP, all works that commenced after the approval of the CEMP and subplans were treated as “construction” works and not considered or assessed as “low impact” works by the Environmental Representative.*

*Works were not undertaken in a linear fashion, with different activities commencing in different areas at different times. The types of works that were undertaken in the first few months of 2020 included:*

- *Investigative drilling and excavation;*
- *Establishment and operation of ancillary facilities;*
- *Clearing and transplantation of vegetation;*
- *Installation of mitigation measures;*
- *Property adjustments;*
- *Utilities relocation and connections;*
- *Archaeological investigation, protection and salvage; and*
- *Minor road adjustments.*

*The works listed, had it not been for the approved CEMP could have been considered “low impact works”. Therefore, while project works commenced in January 2020, activities that could have been defined as “construction” did not actually commence until after this time.*

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*GRCLR understands that the intent of CoA E49 is to mitigate, where possible, construction noise through the implementation of operational noise mitigation measures. For the purposes of meeting the intent of CoA E49, GRCLR considers significant works to include works that would generate noise impacts that require the full implementation of the Noise and Vibration Management Sub-plan and Monitoring Program, including the Out of Hours Works Protocol, in order to manage and mitigate the impacts of those works.*

Civil construction works, including the decommissioning works on the former Carlingford Line, are considered significant works, which could not be considered “low impact”, or commence without the approved CEMP and sub-plans. The commencement dates for these works are identified in Table 1 by the portions and the twenty-two (22) areas defined in TfNSW’s contract with Parramatta Connect. These areas and their construction start dates are also shown on the attached figure (Appendix B). Table 1 also identifies the eighteen months from commencement of these works in each area – the timeline required by CoA E49.

#### Potentially Affected Properties

GRCLR has prepared a Draft ONVR, which will soon be submitted to TfNSW, the Environmental Representative and the Acoustic Advisor for review and endorsement. Subsequently, the ONVR will be submitted to the Secretary for approval. In accordance with E48 consultation with the owners of potentially affected properties can commence following approval of the ONVR.

GRCLR anticipates, that the process for consultation, including implementation of any mitigation measures will take between six (6) to nine (9) months for each property, provided the matter doesn’t require the Complaints and Dispute Resolution process to be implemented. Currently the Draft ONVR has recommended fifty-nine (59) properties across the whole alignment be considered for property treatments. The majority of these properties have been identified as non-residential (medical and educational). The number of properties in each area that have been identified in the Draft ONVR as potentially needing to be considered for treatment is also identified in Table 1.

#### Proposed Alternate Timeframe

Basing the original eighteen-month timeframe on the Civil Construction Commencement dates, as presented in Table 1, and considering the anticipated six-to-nine-month implementation period, GRCLR considers that an extension of time is required for implementation in eleven (11) of the twenty-two (22) areas. The proposed alternate timeframe for these areas is identified in Table 1.

Of these eleven (11) areas, GRCLR currently anticipates that there will be no need for property treatments in six (6) of the areas, however they have been allocated an alternative timeframe in case it is identified during final design resolution that treatment is needed in those areas. There are ten (10) properties within the remaining five (5) areas currently recommended for treatment by the Draft ONVR. It should be noted that it is expected a proportion of these properties would be either unsuitable for treatment or already have acoustic treatment in place.

As the number of potentially impacted properties is relatively small, it is considered that the potential impacts of the proposed alternate timeframe are not significant.

Based on the above, GRCLR requests that the proposed alternative timeframe for implementation of CoA E49 contained in Table 1 be approved by the Secretary.

Table 1: Construction Commencement and Proposed Alternate Timeframes

Parramatta Connect Contract Portion	Parramatta Connect Civil Construction Area (see attached figure)	Civil Construction Commencement	Eighteen months from Civil Construction Commencement	Approximate Number of Properties Recommended for Treatment*	Proposed Alternate Timeframe
<b>Portion 1A</b>	Area 1.1	October 2020	April 2022	8	April 2022
<b>Portion 1A</b>	Area 1.2	September 2020	March 2022	4	March 2022
<b>Portion 1A</b>	Area 1.3	November 2020	May 2022	5	May 2022
<b>Portion 1A</b>	Area 1.4	September 2020	March 2022	11	March 2022
<b>Portion 1B</b>	Area 1.5	October 2020	April 2022	0	April 2022
<b>Portion 1B</b>	Area 1.6	November 2020	May 2022	1	May 2022
<b>Portion 1B</b>	Area 1.7	October 2020	April 2022	3	April 2022
<b>Portion 1B</b>	Area 1.8	October 2020	April 2022	1	April 2022
<b>Portion 1B</b>	Area 1.9	October 2020	April 2022	0	April 2022
<b>Portion 1B</b>	Area 2.1	June 2020	December 2021	2	April 2022
<b>Portion 1C/1D</b>	Area 2.2	June 2020	December 2021	3	April 2022
<b>Portion 1D</b>	Area 2.3	November 2020	May 2022	7	May 2022
<b>Portion 1D</b>	Area 2.4	April 2021	October 2022	9	October 2022
<b>Portion 1D</b>	Area 2.5	January 2020	July 2021	2	April 2022
<b>Portion 1D</b>	Area 2.6	January 2020	July 2021	0	April 2022
<b>Portion 1D</b>	Area 2.7	May 2020	November 2021	0	April 2022
<b>Portion 2</b>	Area 3.1	April 2020	October 2021	1	April 2022
<b>Portion 2</b>	Area 3.2	January 2020	July 2021	2	April 2022
<b>Portion 2</b>	Area 3.3	January 2020	July 2021	0	April 2022
<b>Portion 2</b>	Area 3.4	January 2020	July 2021	0	April 2022
<b>Portion 2</b>	Area 3.5	January 2020	July 2021	0	April 2022
<b>Portion 2</b>	Area 3.6	March 2020	September 2021	0	April 2022

\* The number of properties recommended for treatment is still being finalised as final detailed design is being resolved.



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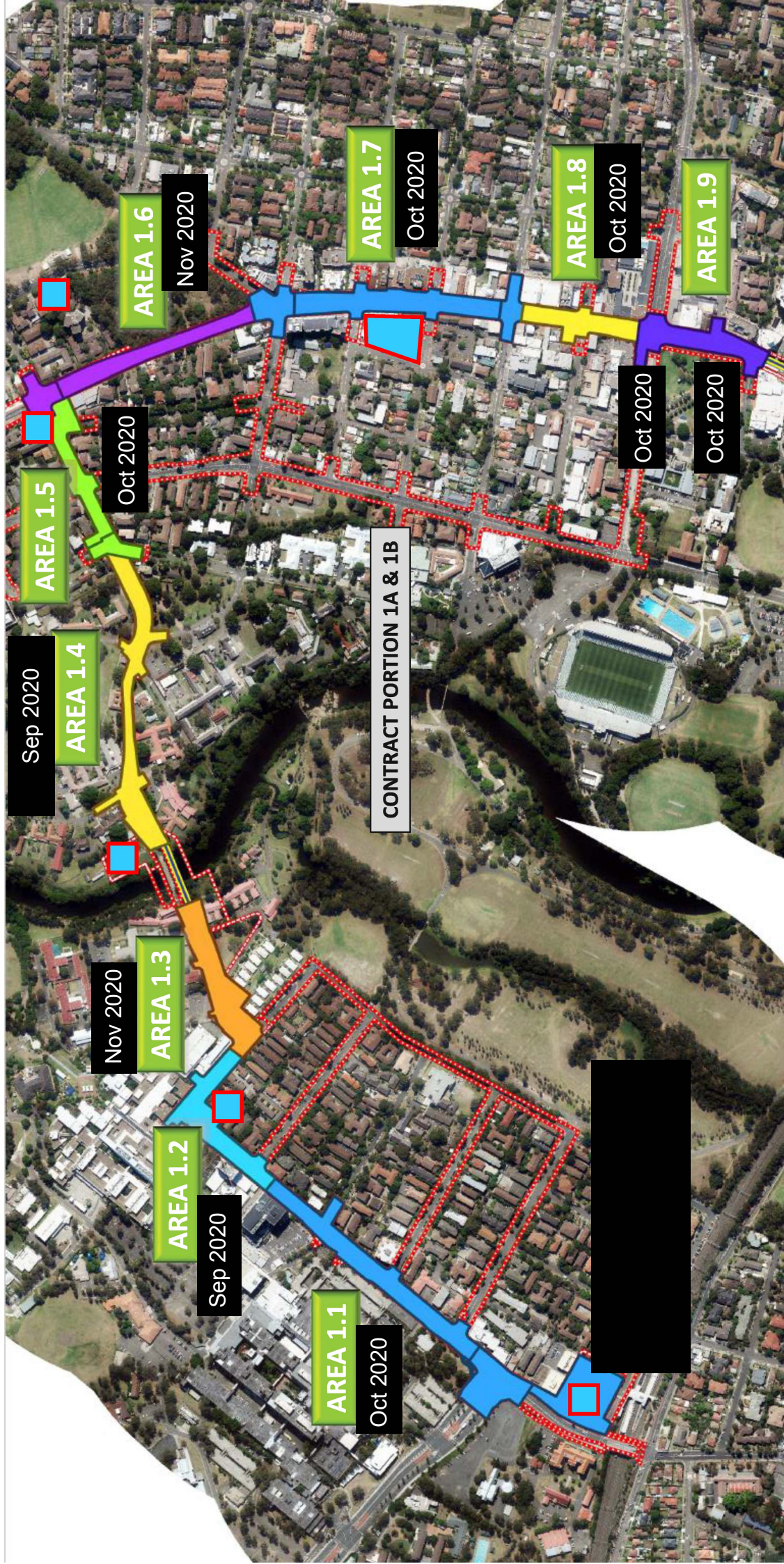
## Appendix B

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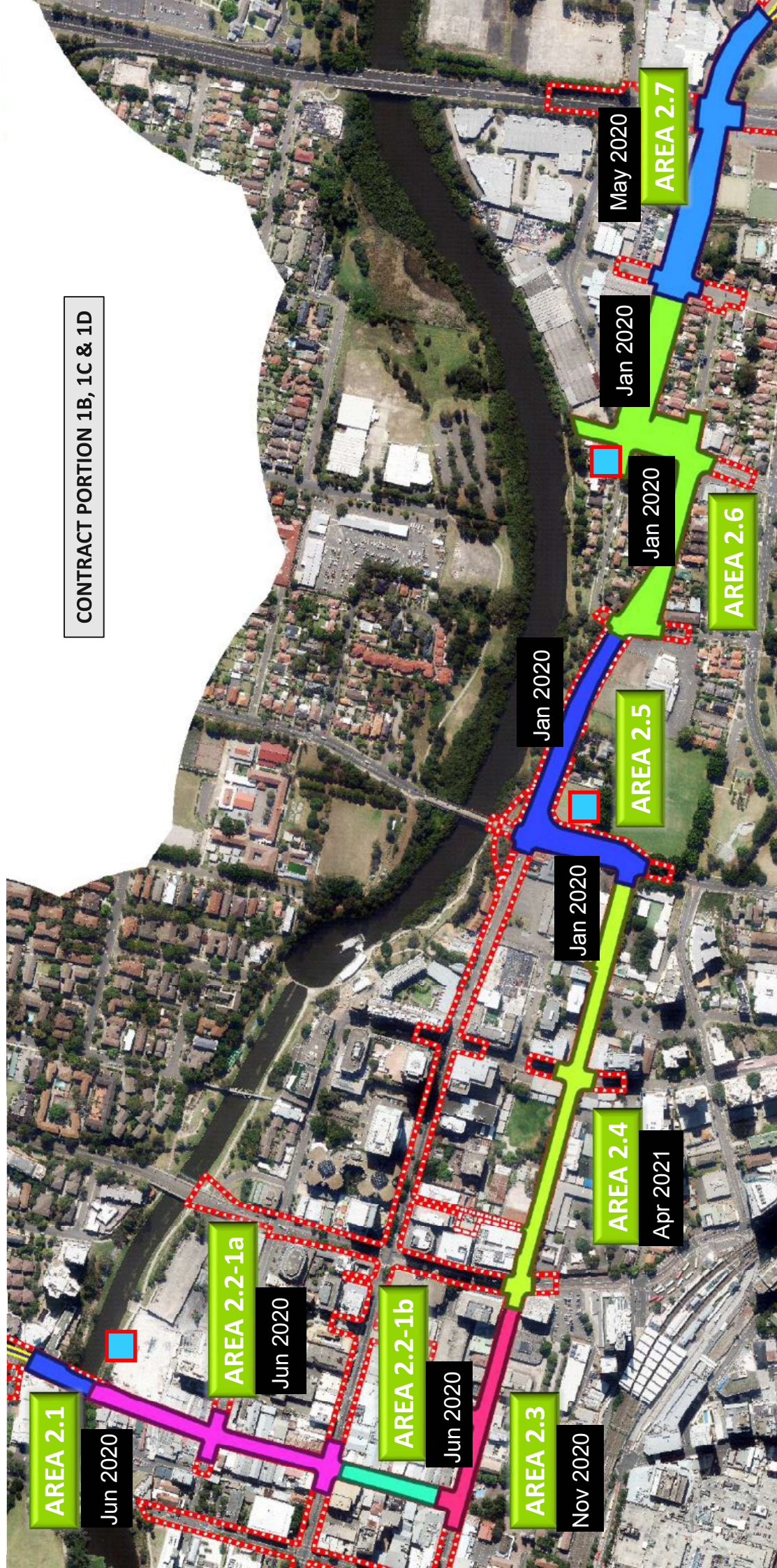
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CONTRACT PORTION 2

