

Our Ref:220976

7 December 2022

NSW Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124



ENGINEERING
PLANNING
SURVEYING
CERTIFICATION
PROJECT MANAGEMENT

ABN 26 134 067 842

Dear Sir/ Madam,

Planning Submission – Parramatta Light Rail Stage 2 – SSI 10035

This planning submission has been prepared by Barker Ryan Stewart on behalf of Tanert Pty Ltd who are the owners of existing industrial sites at 2-8 Thackeray Street and 35 Grand Avenue, Camellia.

Transport for NSW has sought planning approval for Stage 2 of the Parramatta Light Rail project under State Significant Infrastructure application SS10035. An assessment of the proposed and alternate alignments for the Camellia precinct has been undertaken by BRS and comments provided under specific headings below. These options are detailed in Figure 1 for reference with our clients sites identified in red.

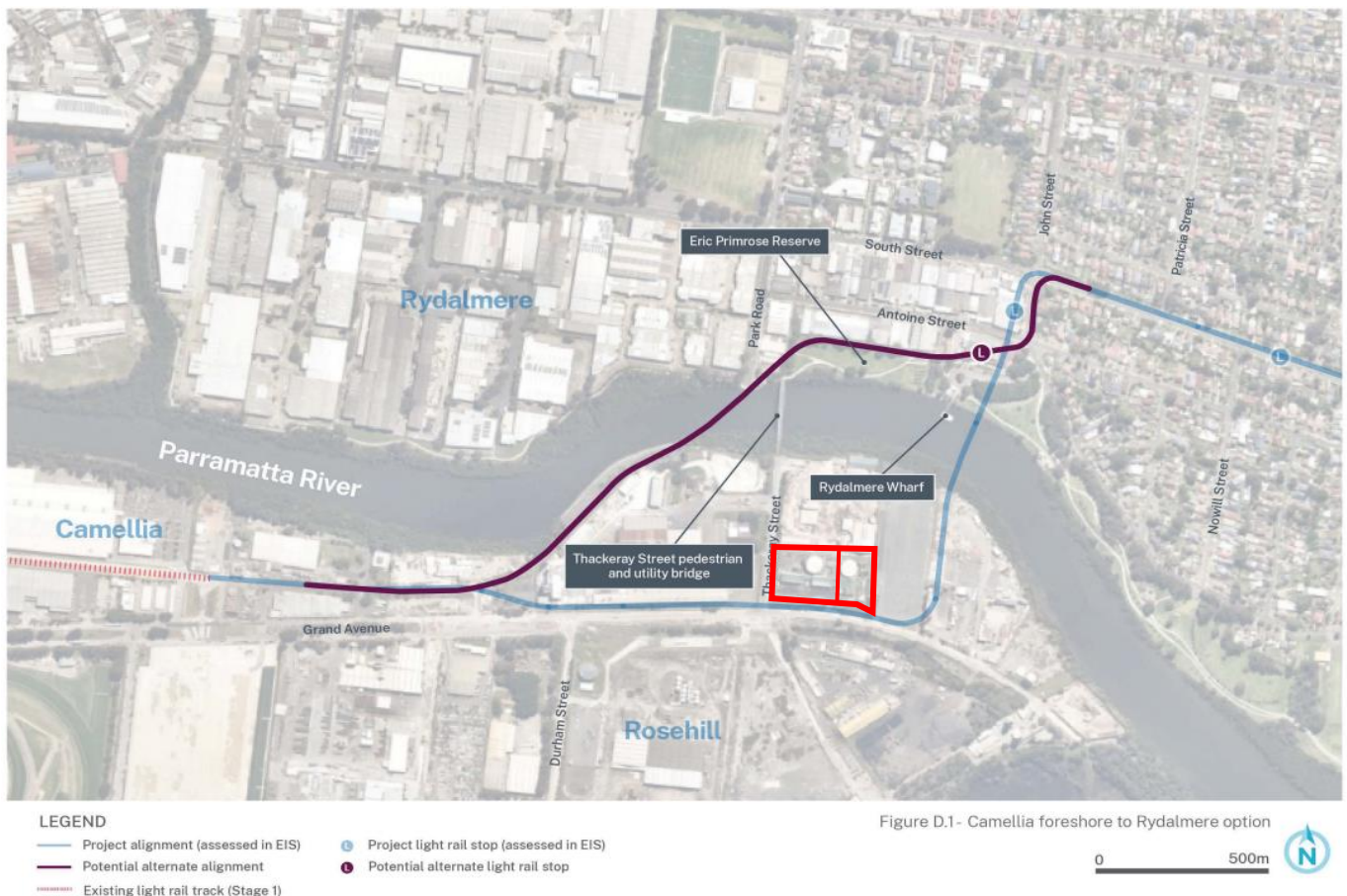


Figure 1: Extract from Figure D.1 Camellia foreshore to Rydalmere option

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Land Acquisition

The EIS confirms that permanent land requirements would have the potential to directly affect 'about' 104 properties, including:

- 47 government-owned properties (39 partially impacted and eight fully impacted); and
- 57 privately-owned properties (36 partially impacted and 21 fully impacted).

Based on the cross sectional diagram provided in the EIS documentation for Camellia, the light rail will require a 7.4m corridor acquisition from properties on the northern side of Grand Avenue. This acquisition corridor has been indicatively marked in Figure 2 below and within our clients sites, would result in the loss of a modular administration building, egress gate and driveway to Grand Avenue and potential loss or redesign of the hardstand car spaces that are imperative to the operation of the sites. Current tenants, Veolia, have confirmed that partial acquisition impacts will include, but not be limited to, the following:

- Road blockages which will impact internal site operations and result in unnecessary vehicle queuing within the site;
- Direct site access will be impacted during construction and operation of the light rail; and
- Acquisition impacts to inbound water, stormwater retention and parking which are fixed elements of Veolia's operating requirements at all times.

Whilst our clients aren't predominantly objecting to the proposal on grounds of acquisition, the alternative development route will require less private property acquisition which will result in a reduced impact on the established operation of important industrial sites in the east of Camellia. In our opinion the alternate route represents a more functional and appropriate design response that takes into consideration the level of impact acquisition would generate on Grand Avenue.



Figure 2: Extract from Figure D.1 Camellia foreshore to Rydalmere option

Traffic, Access and Operational Impacts

Given the industrial nature of our clients sites, unobstructed heavy vehicle access is required to facilitate appropriate operation of the site. TfNSW confirm that Grand Avenue is a designated heavy vehicle route that can accommodate large vehicles, including B-doubles that are used to move road and container freight.

The EIS provides no clarity around impact to access arrangements and operational vehicle movements other than confirmation that difference in grade may perpetuate some property or access adjustments on Grand Avenue. The document further justifies that property access adjustments and design refinements would be undertaken at future detailed design stage as follows:

Access to other properties may also need to be adjusted due to the difference in grade between the property and the light rail or road alignment. This could involve changes to the location or arrangement of driveways. Design refinements that reduce property access adjustments would continue to be considered during design development.

This provides no certainty for land owners or industrial tenants and it's unclear why access arrangements have not been considered in more detail at this stage of the development. The proposal is seeking development consent for the introduction of transport infrastructure that will impact the amenity and operation of adjacent properties and Transport for NSW should have design plans available to detail future access to properties.

The construction and operation of the light rail network will create inherent challenges for those industrial sites that require unobstructed vehicle access to facilitate ongoing operations. Whilst it is accepted that new transport infrastructure of this scale will always generate operational conflict in some capacity, TfNSW confirm the alternate route will minimise interactions with industrial properties which will ensure the long term viability of important industry development on Grand Avenue. We also note the EIS confirms the following maximum daily construction traffic volume is estimated for Grand Avenue:

- Grand Avenue – up to 122 heavy and 342 light vehicle movements

The associated impact of up to 122 heavy vehicle movements and 342 light vehicle movements on the operation of the Grand Avenue industrial sites is likely to be significant. Note this will be in addition to vehicle movements generated by the existing industrial sites. These impacts are unacceptable on grounds that conflict with heavy vehicles can be almost entirely avoided through implementation of the alternate foreshore route.

Social and Economic Impacts

The proposed route that utilises an extended corridor adjacent to Grand Avenue is likely to generate the following social and economic impacts for our clients industrial tenants:

- Effects of partial property acquisition on ongoing industrial operations;
- Extended periods of construction, whether direct or cumulative are likely to place downward pressure on prices and rents in the short term;
- Revised access designs likely to devalue land holdings on Grand Avenue where important elements of the site (built form, parking etc) are to be impacted by acquisition;
- Lack of clarity around design for revised access to property is likely to generate uncertainty for tenants. Revised access design may not be suitable for particular tenants with no apparent recourse for owners who would then be required to absorb any financial ramifications should the site no longer be suitable for purpose. Due to the size and turning circle of heavy vehicles, industrial sites usually require separate ingress and egress driveways to facilitate appropriate vehicle circulation through the site. This is also important to ensure drivers can avoid reversing onto busy roads. It's unclear whether this has been assessed on a site by site basis, however it's apparent that the majority of our clients existing egress driveway would be lost through acquisition which will have significant consequences for site operations;
- Amenity impacts for industrial tenants during construction (light rail, significant utility relocation works and three signalised intersections on Grand Avenue);
- Operational amenity impacts for tenants (light rail and additional intersections to be sited immediately adjacent to the site); and
- Construction works require alterations to road traffic networks, including closures and detours, lane reconfiguration, intersection reconfiguration, temporary traffic signals, and reduced vehicle speed.

Business activity is likely to be affected by the works given customers/ suppliers are likely to experience issues accessing the site.

Perhaps most important to industrial land owners on Grand Avenue is the uncertainty around controlled vehicle ingress/ egress to sites to avoid conflict with light rail movements. Industrial tenants are reliant on clear passage into and out of sites to facilitate their ongoing operations and consistent delays from light rail operations is likely to generate economic impacts that realistically cannot be quantified. Further, the bulk of these industrial socio economic conflicts can be avoided through implementation of the alternate route that will promote a far superior user experience for those travelling along the scenic foreshore.

Of note to BRS and the owners/ occupiers of the industrial sites to be impacted, TfNSW confirmed the following:

The Camellia to Rydalmere foreshore option would have less impacts to businesses than the project as described in the EIS, due to less industrial land being required along Grand Avenue in Camellia and on the western side of John Street. The alternate route alignment along the foreshore would also remove the need for to install three traffic signals on Grand Avenue, which would avoid potential business impacts associated with the project described in the EIS.

This is further confirmation that a better planning and economic outcome has been identified which must now proceed to the detailed EIS phase for consultation and submission.

Alternative Option

Further investigations by Transport for NSW have resulted in the exhibition of the alternate "Camellia foreshore to Rydalmere option" which would amend the alignment of the current proposal to avoid the eastern end of Grand Avenue. TfNSW identify the revised route as follows:

An alternative option for crossing the Parramatta River between the Camellia foreshore and Rydalmere is being considered by Transport for NSW. This route option, referred to as 'the Camellia foreshore to Rydalmere option' extends along the Sandown Line corridor in Camellia; however, instead of crossing south over to Grand Avenue, it continues along the river foreshore before extending across a new bridge structure landing in the western section of Eric Primrose Reserve, Rydalmere. The route would then extend along the northern boundary of Eric Primrose Reserve between Park Road and Jean Street, with a light rail stop located close to Rydalmere Wharf. From there, it would extend north along John Street, and east into South Street.

The alternate route utilises the existing Sandown Line Corridor and rather than intersecting the existing industrial precinct at Grand Avenue, proceeds to continue along the river foreshore through Camellia. Although the obvious benefit is clearly the absence of long term light rail conflict with industrial holdings on Grand Avenue, TfNSW identify a number of advantages which also relate to broader community and environmental interests below:

This option is considered to have some advantages over the project alignment described in the EIS:

- *it involves a more direct route through Camellia*
- *there would be fewer interactions with industrial properties in Camellia*
- *there would be separation from Grand Avenue avoiding heavy vehicle interactions, several new signalised intersections and property access impacts*
- *it would avoid several major utilities*
- *impacts to the Eric Primrose Reserve amenities buildings would be avoided and only minor configurations needed to the Rydalmere Wharf car park*
- *impacts to F3 Parramatta River ferry services from Circular Quay would be reduced as the Rydalmere Wharf would remain operational during construction of the bridge*
- *less clearing of mangroves adjacent to Parramatta River would be required and the removal of fig trees in Eric Primrose Reserve would be avoided.*

This option may also provide light rail customers with a range of benefits such as potentially shorter journey times, an enhanced interchange as a result of a light rail stop being located closer to

Rydalmere Wharf, and a more scenic route along the foreshore, which would also improve active transport link amenity for cyclists and pedestrians. This option also presents an opportunity to upgrade Eric Primrose Reserve.

Without a light rail stop planned for Grand Avenue east, it remains to be seen how the proposed alignment assists in the future growth of the industrial land holdings that the works will impact. In contrast, the alternate option will provide an active transport pathway along the Sandown Line corridor and river foreshore in Camellia which is considered to be a far more desirable outcome for walkers and cyclists than traversing the industrial precinct along Grand Avenue. This option would also avoid major utility relocation works on Grand Avenue which would generate cumulative impacts to adjacent properties during construction.

With respect to traffic network connectivity and performance, Appendix D of the EIS confirms the alternate foreshore alignment option would remove the need for three signalisations on Grand Avenue. This clearly represents an improved traffic outcome that would reduce associated conflicts between heavy vehicles, light rail, pedestrian and cyclist movements. In relation to active transport, this option would have potential benefits in terms of providing important north-south connections, with improved safety outcomes and less potential conflict with vehicles as a result of the light rail extending along the Camellia foreshore instead of Grand Avenue. TfNSW also confirm that Improvements to existing walking and cycling infrastructure would be delivered as part of the alternate option.

It is acknowledged that land acquisition is also required for the alternate route, however, TfNSW confirm this option would 'reduce the area of privately-owned land that would be required compared to the project as described in the EIS'. Further we understand a significant portion of these land requirements are likely to result in full acquisition of private property which allows landowners to be appropriately compensated in full without ongoing impacts to the operational capacity of these sites as would be the case for partial acquisition.

Conclusion

Whilst our clients acknowledge the community benefits that can be generated by the Stage 2 light rail, the alternate design route is preferred on the basis that development as proposed in the EIS represents an inferior design outcome for the community and our clients as follows:

- The proposed route will facilitate far greater impact on the operation of established industrial sites located on Grand Avenue which are reliant on unobstructed access to maximise operational efficiency. These sites will not be impacted by an alternate route along the foreshore.
- The proposed route will generate greater impact on the sensitive wetlands and mangroves as determined in Appendix D of the EIS.
- The proposed route is likely to generate social and economic impacts to landowners subject to partial property acquisition and unconfirmed site access design modifications that will impact current industrial leasing and tenancy agreements.
- The alternate route avoids the construction of three signalised intersections on Grand Avenue which will result in cost savings for the government and maintenance of operational efficiency for industrial sites subject to frequent heavy vehicle movements.
- The alternate route will promote an active travel path along the foreshore which is a scenic benefit for users of the light rail and persons utilising shared pathways.

BRS and Tanert Pty Ltd welcome the opportunity to provide further constructive feedback or consultation in relation to a revised proposal comprising the alternate foreshore route. We note the alternate proposal would require major revision of the documentation submitted and believe it is best practice for TfNSW to prepare and exhibit detailed plans identifying accurate acquisition requirements and associated access and property impacts. This will provide certainty to those impacted landowners that has not been afforded to our clients in the current EIS process.

I can be contacted by phone 02 9659 0005 or email ben@brs.com.au if you have any questions or require anything to be clarified.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'B Miller', written in a cursive style.

Ben Miller | Senior Town Planner
Barker Ryan Stewart Pty Ltd