

Parramatta Light Rail Stage 2 (PLRS2) – Submission

**John & Bernadette Douglas
90 Lancaster Ave
Melrose Park (Ryde LGA)**

7th December 2022

We write to you as concerned residents at 90 Lancaster Ave Melrose Park (Ryde LGA) and are the closest riverfront property to the proposed bridge crossing at Melrose Park.

Our primary concern with the Planning Proposal (PP) and Environment Impact Statement (EIS) relate to the specific location of the Melrose Park to Wentworth Point bridge crossing which determines the specific issues we raise.

We are members of the Melrose Park Residents Action Group (MPRAG) and the Waterfront Action Group NSW (WAG) and have consulted with and support the submissions and recommendations these organisations have made separately regarding the PLRS2 PP & EIS.

We are former members of the Transport for NSW, PLRS2 Community and Stakeholder Reference Group (PLRS2 CSRG) and a former member of the Olympic Co-ordinating Authority (OCA) Homebush Bay Environment Remediation Group (HomBerg) and therefore understand the importance of community consultation, to gain community support for large projects.

We have also consulted directly with key academic staff at Birdlife Australia NSW (Dr Holly Parsons), the University of Technologies' (UTS) Institute for Sustainable Futures (Kerryn Wilmot, Research Director) and the Executive of the Amateur Beekeepers Association of NSW (ABA) (Drew Maywald) for their independent expert advice that various impacts of PLRS2 may have.

We are not convinced, with current information provided, of the benefits, value and patronage for the PLRS2 as an alternative means of public transportation for residents east of the proposed Melrose Park to Wentworth Point Bridge (Bridge), including those residents in Melrose Park (Ryde LGA). Should we choose future public transport options, we believe we would only use the bridge crossing infrequently for events at Sydney Olympic Park (SOP). However, we are aware of the concerns and political and developer promises made to the residents in Wentworth Point and recognise the value of the PLRS2, for those residents in Wentworth Point to travel to and from Sydney and Parramatta CBD's.

We do have concerns and challenge any attempts to make the bridge open to private transportation or public cars (e.g., taxis or ride share) and would request legislation is in place to prevent future NSW Governments from doing so. This is of particular concern as there is no funding committed yet to the PLRS2.

Our strong preference that we will continue to fight for is for the bridge to be located further to the west of both the bridge locations in Chapter 2, Maps 4 & Chapter 5 Figure 5.6. of the EIS. Our preference is to locate the Bridge to the west of the current public amenities block and boat ramp as outlined in the sketch provided by MPRAG, see attached

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The table following outlines what we believe are the clear benefits for have a bridge crossing proposed by MPRAG and supported by WAG.

Table outlining benefits of MPRAG bridge crossing location

Issue	EIS PLRS2 Chapter 2 Map 4	EIS PLRS2 Chapter 5 Figure 5.6	MPRAG option
Potentially eliminates the need for compulsory acquisition of private housing	X	?	✓
Eliminates need for removal and or damage of mature and significant trees	X	?	✓
Potentially reduces noise, vibration and light effecting residents ^{1,7}	X	X	✓
Reduces impact relating to beehive proximity and Indigenous cultural place ^{2,3}	X	?	✓
Reduces overall distance of PLRS2 (Hope St to Wentworth Point)	X	X	✓
Potentially reduces the need to close the boat ramp for 3 years	X	X	✓
Potentially avoids need to temporarily relocate high tension stanchions	X	?	✓
Avoids need for any infrastructure on Ryde LGA land	X	?	✓
Reduces likelihood of compensation claims for nuisance and property value damages from nearby property owners ^{1,4,5,7}	X	?	✓

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Discussion on key questions

1. Compulsory acquisition of private housing

Why use private land when vacant public land is available?

The use of private land when public land is available, is contrary to statements made by the NSW Government Ministers. It would be an act of nuisance to interfere with private property rights and amenity when vacant public land is available.

2. Mature & significant trees

Why remove or damage valuable sources of nectar and pollen for bees and other fauna that need this scarce food & habitat source?

Climate Change has placed great pressure on the natural environment including birds, insects, micro bats, bees (*Varroa mites*) and other fauna. The removal of any significant and mature trees in the relatively sparse former industrial site will,

- a. Further sever the vital green corridor between Brush Park and Newington Nature Reserve for fauna. *See attached aerial map*
- b. Place additional pressure on local fauna which rely on this source of food, habitat, and protection. Replacing with new “mature” trees will take at least 40 years to replace these existing trees.
- c. Potentially be fatal for nearby DPI Registered apiaries and jeopardise local amateur beekeeping in the area.
- d. Contribute to the removal of the aesthetic green corridor relief along Wharf Rd. This relief is recognised by Parramatta City Council by placing Landscaping in Wharf Rd within the Local Environment Plan as a Local Heritage Item Listing (I311).

3. Noise, vibration & light effects

Why unnecessarily disturb residents (32m) and possibly nearby apiaries when a more westerly alternative route is available?

- a. Further distance from the PLRS2 route will reduce impacts of Noise, vibration, and light.

“The World Health Organization (WHO), which advocates the construction of healthy houses (houses that enable residents to be in good physical, mental, and social condition), stipulates that noise in “healthy houses” is less than one decibel (dB)”.¹

There are very few published studies conducted on the effects of light rail, and none that could be found on the amplification of noise, vibration & light over water.

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However, the conclusion of 1 study on light rail is “The influence of rail transit noise on the surrounding residential areas is universal, and the influence of noise at night is greater than that during the day. The noise of rail transits seriously affects the sleep quality of residents. There is a nonlinear positive correlation between the running speed of rail transits and noise values, and it is related to the distance from the light rail station. The noise attenuates with an increase in the horizontal distance, and the attenuation rate gradually decreases. The noise of rail transit is the same during the day, but the variation in noise on Friday and Monday is higher than that at other times. By analysing the acoustic environment of typical residential areas along the Yangjiaping light rail, it can be seen that the noise level in the study area is above 70 dB during the day and approximately 60 dB at night. In this acoustic environment, the sound will greatly affect people’s rest and comfort of living”¹.

4. Multiple beehives and Indigenous Cultural Place in the vicinity of bridge

Why violate Department of Primary Industries (DPI) Beekeeping Code of Practice for NSW?

“Hives should not be located within the vicinity of schools, child care centres, hospitals or other public facilities”².

While it is not known whether the presence of up to 1 Million or more bees in the close “vicinity” of the bridge (112M) the attenuation of noise vibration and light (particularly at night) by distance maybe a considered precaution. The MPRAAG route option is greater than 200m from closest apiary.

A large number of seashells have been identified in the vicinity of the proposed bridge. The Aboriginal Land Council NSW has agreed to visit the site to confirm the presence of a midden.

5. Distance from Hope Street

Why go further East and increase the distance of PLRS2 route?

One logical conclusion maybe that the longer the route of the PLRS2 the more expensive it will be. Conversely, the shorter the route the less expensive the PLRS2 may be. The MPRAAG option is a shorter PLRS2 route therefore potentially less expensive.

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6. Closure of boat ramp

Why not consider options to keep boat ramp open?

This boat ramp is the first available trailer boat launching facility on the western end of the Parramatta River and as such is used by persons in our local area as well as many hundreds of boat owners in Western Sydney. A closure of this ramp would mean that added pressure would be placed on ramp facilities to the east of Wharf Rd – see table below

Ramp Location	Car and boat trailer parking	Access
Wharf Rd, Melrose Park	80+	Good – Largest capacity parking on the Parramatta River
Rhodes Point, Rhodes	12	Poor – small facility with little capacity
Kissing Point Park, Putney	35	Fair - high usage means long waits at peak times to access ramp
Bayview Park, Concord	40	Poor – not suitable for larger boats
Wymston Parade, Abbotsford	4	Poor – only for launching dinghies
Taplin Park, Drummoyne	50	Good – high usage means long waits at peak times to access ramp

I am advised that members of **Stop The Lock Out** who are fisherman and frequently use the boat ramp have concerns regarding the closure of the boat ramp for 3 years, the impact on other boat ramps during that period, the reduction of car and boat parking facilities after project completion and the lack of consultation that has occurred with them given the impacts.

7. Temporary relocation of High voltage stanchions

Why not consider other route options to avoid the need for stanchion relocation?

While we strongly support the integration of the high-tension lines into the bridge, we would think the additional step of temporarily relocating the stanchions, while the bridge is being built is an unnecessary cost and inconvenience.

8. Use of land in Ryde LGA

Why utilise public and or private land in the Ryde LGA, when developers and Parramatta City Council & LGA gain financial benefits for completion of PLRS2?

- No public or private funding has been allocated for infrastructure in the Ryde LGA
- The developers involved in the Melrose Park North, Melrose Park South & The Sanctuary at Wentworth Point, all gain financial advantage from the bridge and PLRS2, as they gain an uplift in density (Floor Space Ratio) increasing the number and heights of dwellings they can build.

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- c. Parramatta City Council gains financial benefit from the developer contributions for all of the above, as they are ALL in the Parramatta LGA.
- d. As explained previously, we are not convinced, with current information provided, of the benefits, value and patronage for the PLRS2 as an alternative means of public transportation for residents east of the proposed Melrose Park to Wentworth Point Bridge (Bridge), including i.e. those residents in Melrose Park (Ryde LGA). Should we choose future public transport options, we believe we would only use the bridge crossing infrequently for events at Sydney Olympic Park (SOP)

9. Potential compensation claims for nuisance and property value damages ⁴.

Why disrupt any residential low rise R2 property owners, when the majority of benefits for a bridge are mainly for the developer's density uplift for a newly zoned high-rise development, while using "boundary creep" to "pass off" former suburbs identity?

Why further inflame residents of Melrose Park (Ryde LGA), when a solution for a bridge further west on public land is available?

The letter received from Abbott Valuer⁴ suggests "Your property occupies a parcel of good quality land that enjoys an absolute Parramatta River water frontage, situated in a quiet, serene location close to all services, facilities and amenities. It is what a valuer would consider to be a prime location. At this time, as a guide or broad estimate of the impact on the value of your property, if the new bridge is within 120 metres of your property, the impact would be somewhere between 20% and 50% of the current market value

There are several other properties within the vicinity of the proposed bridge location that would also be considered "prime location" and have similar impacts on property values.

The NSW Government's Geographic Names Board (GNB) policy and procedures manual is clear on "Boundary Creep" page 107- 9.1.3 Boundary Creep and "Boundary Definition" page 104- 6.8.4 Boundary Definition.

- a. **Clearly the There is NOT consistent nor NON-CONFLICTING with the use of a address.** "Where regular, consistent and non-conflicting use of a address locality name is identified beyond the original boundaries assigned, consideration should be given by the Local Government and GNB to changing the boundaries for the address locality" page 172
- b. **Clearly the development has not been assessed on good planning principles, easy to identify nor readily interpreted by the community.**
 - a. Address locality boundaries should be easy to identify and readily interpreted by the community. Address locality boundaries shall be determined based on good planning principles and define areas with common community interests.
 - b. Address locality boundaries shall be of a reasonable size for practical purposes, such as including a shopping precinct or community school. Within urban areas an ideal size is around 500ha, with a preferred minimum area of 100ha.

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c. Address locality boundaries shall be contiguous and may not overlap another address locality boundary.

d. An address locality cannot be an island within another locality. All address localities should have boundaries that run alongside two or more other localities, the seashore or state boundary.

e. Address locality boundaries shall not extend beyond local government, state or territory boundaries. page 104

Yours faithfully,

The image shows two handwritten signatures in blue ink. The signature on the left is 'John Douglas' and the signature on the right is 'Bernadette Douglas'. Both are written in a cursive, flowing style.

John & Bernadette Douglas

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