

15 December 2022

Mr Keith Ng
Senior Planning Officer
Infrastructure Assessment
Department of Planning and Environment
keith.ng@planning.nsw.gov.au

Dear Mr Ng,

CONFIDENTIAL: Submission to the Parramatta Light Rail Stage 2 SSI-10035

This submission has been prepared by Keylan Consulting Pty Ltd on behalf of The Billbergia Group (Billbergia) in response to the Transport for NSW's (TfNSW) Parramatta Light Rail (PLR) Stage 2 Environmental Impact Statement (EIS) which is currently on public exhibition until 16 December 2022. This submission incorporates input from AJC Architects.

Billbergia is the owner of a 10.3 hectare (ha) site at 1, 1C, 3-9 Grand Avenue, Camellia. Billbergia has been engaged in discussions over the past decade with the City of Parramatta Council (Council), Department of Planning and Environment (DPE) and TfNSW on the urban renewal of their sites and the broader Camellia Town Centre to deliver substantial housing and employment opportunities. On this basis, the PLR Stage 2 is relevant to the future of Billbergia's site.

This submission undertakes a high-level review of the PLR Stage 2 SSI application in context of the Government's commitment to the urban renewal of Rosehill Camellia. This submission must be considered by TfNSW and DPE prior to the determination of the EIS. The site in relation to the PLR Stage 1 and Stage 2 is shown in the figure below.

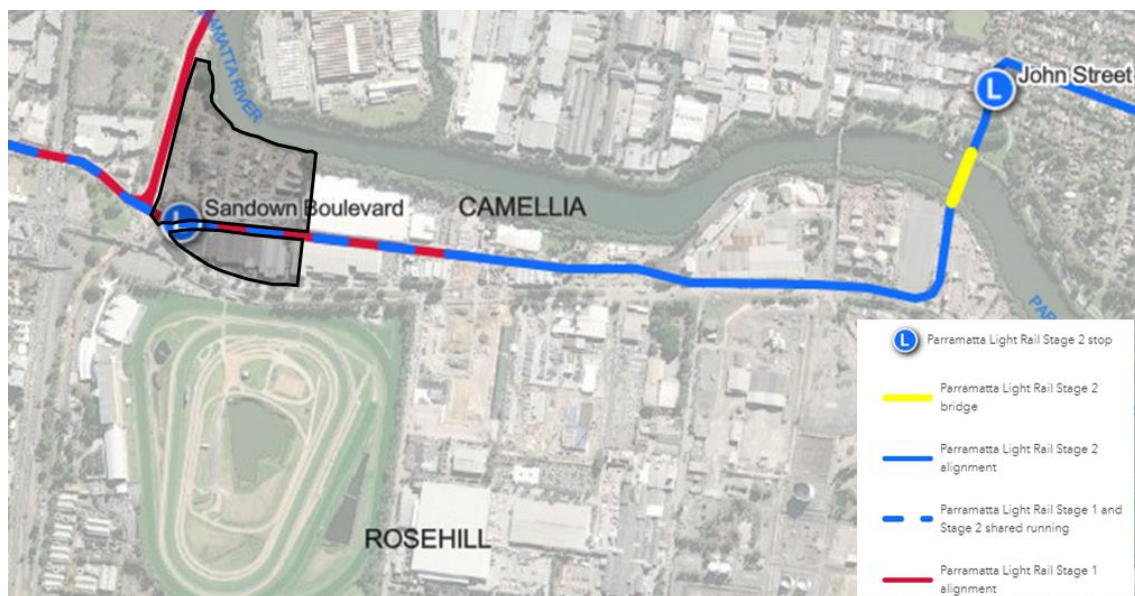


Figure 1: The site and PLR Stage 1 & 2 (Base Source: TfNSW)

1 Background

In October 2017, Keylan made a submission to the PLR Stage 1 EIS. Stage 1 of the light rail has since been constructed and Sandown Line was selected as the chosen route. The Sandown Line bisects Billbergia's site as shown in the above image.

This submission addresses the PLR Stage 2 EIS which proposes the construction and operation of light rail tracks along the Rosehill Camellia Peninsula, across the Parramatta River and east through Melrose Park towards Sydney Olympic Park. Stage 2 also proposes the construction of rail reserves, new stations and supporting infrastructure.

Stage 2 also proposes a new station along the section of PLR Stage 1 which is already constructed. This new station will be known as Sandown Boulevard and is located directly adjacent to Billbergia's sites.

2 Key issues

This submission considers two new stations in proximity to Billbergia's site proposed as part of the PLR Stage 2. We have comments in relation to these stations that we believe warrant consideration.

The PLR Stage 2 also proposes the construction of a rail reserve on either side of the section of the light rail tracks constructed as part of PLR Stage 1. This rail reserve will have implications for Billbergia's site as it will potentially encroach into Billbergia's land.

This submission also addresses the location and provision of the light rail bridge across the Parramatta River proposed as part of PLR Stage 2. These issues are addressed in the following sections.

2.1 New stations

There are two stations (Sandown Boulevard and Camellia East) proposed as part of the PLR Stage 2 as shown below. The EIS states that the Camellia East station will be delivered at a later date following further development of the town centre and surrounding sites.

Our assessment of these stations is detailed below.



Figure 2: Parramatta Light Rail Stage 1 and Stage 2 alignments (Source: TfNSW)

2.1.1 Sandown Boulevard station

The proposed Sandown Boulevard station on Grand Avenue is close to Billbergia's site. We note that this station is proposed as part of Stage 2, however will utilise the existing tracks approved and constructed under PLR Stage 1.

Billbergia support the provision of this station as it will facilitate the renewal of the Camellia Town Centre and wider precinct into a vibrant and accessible town centre adequately serviced by public transport.

It is noted this station will be positioned at the western end of the Sandown Line, "as close as feasible" to the PLR Stage 1 Rosehill Gardens stop to provide interchange. We support this location, however, request the final EIS to specify the exact location of the station to allow future planning of surrounding sites.

In addition, we note the EIS does not specify that any of Billbergia's sites will be required as part of the station's construction and operation.

Despite this, the indicative width of the station appears larger than the majority of the project area along the Sandown Line (outlined in red in the figure below).

We seek confirmation that Billbergia's land will not be required as part of the construction or operation of this station.

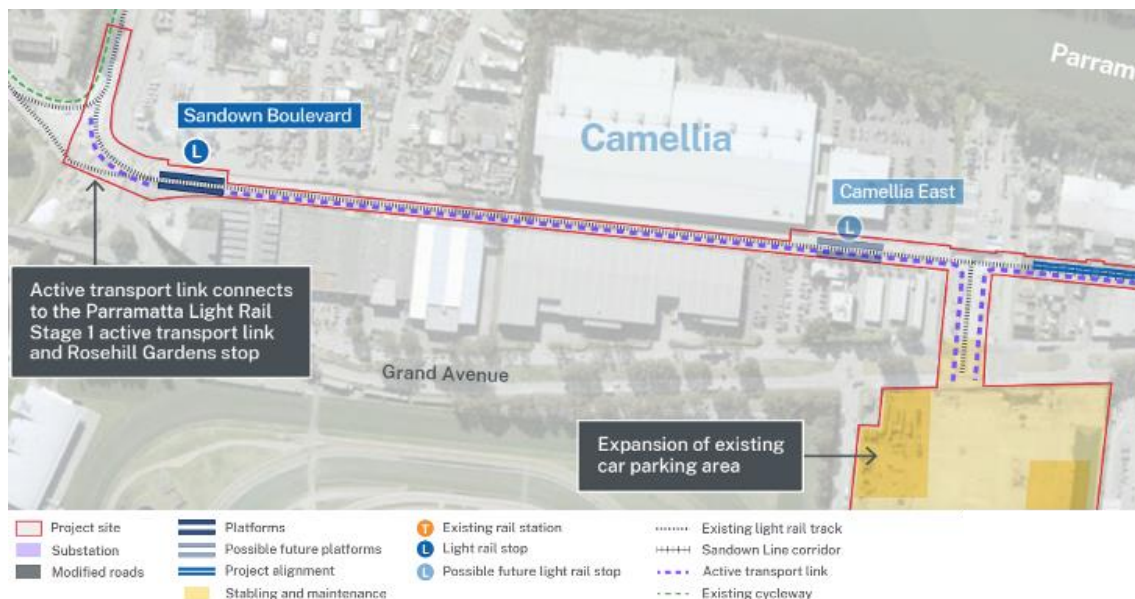


Figure 3: Proposed and indicative stations and Stage 2 project area (Source: TfNSW)

Recommendations

1. The final EIS to specify the exact location of the Sandown Boulevard station to allow future planning of surrounding sites.
2. Confirmation that Billbergia's land will not be required as part of the construction or operation of the Sandown Boulevard station.

2.1.2 Camellia East Station

We also raise concern regarding the provision of the Camellia East station to the east of the Camellia Town Centre. This station is included in the EIS as a "potential future stop" with no infrastructure proposed at this location as part of the PLR Stage 2.

Our position is that this station should be considered as part of Stage 2 to ensure the Camellia Town Centre and broader peninsula can be planned appropriately going forward.

This additional station will also allow the town centre to be serviced by more than one public transport station. It is noted, the next station will not be until the John Street Station across the Parramatta River which is approximately 2.5km north east. This will result in a large portion of the Stage 2 track without direct access to a station.

In addition, and as detailed in the Draft Place Strategy, there are multiple sites east of the Camellia Town Centre that will be developed in the future and would utilise this station. Further, the heavy industrial areas on the eastern side of the peninsula are also important employment lands that the additional light rail station would also service.

Though our main position is that the Camellia East station should be delivered as part of the PLR Stage 2 to provide certainty to land owners and the community, we note that if this is not the case, there is an opportunity for land owners to work with Council and DPE

to assist with the delivery of the station. Billbergia welcome future discussions on this matter.

Recommendations

3. The Sandown Boulevard station to be considered as part of the PLR Stage 2 to ensure the Camellia Town Centre and broader peninsula can be planned appropriately going forward.
4. DPE to engage in discussions with land owners regarding PLR stations in proximity to the town centre.

2.2 Sandown Line Rail Reserve

The section of the Sandown Line that passes through the future Camellia Town Centre is proposed to be a 30m rail reserve that will incorporate light rail, station infrastructure, roadway, pedestrian paths, and a verge for parking and street trees as shown in the figure below.

The EIS proposes the light rail alignment to sit centrally within this rail reserve, with a single vehicular travel lane in each direction on either side. A median will then be provided between the light rail corridor and adjoining vehicular travel lanes to provide for pedestrian crossing along the full length of Sandown Boulevard and maintain precinct permeability.

As the Sandown Line is approximately 20m wide, we anticipate that this 30m reserve will encroach into Billbergia's site boundaries and will result in a loss of approximately 10m of land.

Billbergia's position is that a 30m reserve is excessive and shared pathways and activation of street could instead occur within a 20m reserve. To achieve this, it is suggested alternative design solutions be sort such as the removal of the verge and reduction of traffic lanes down to one. This is considered appropriate as parking should not be encouraged in the Camellia Town Centre given the transit orientated nature of the precinct. These recommendations have been informed by advice from AJC Architects.

Further to the above, we seek clarification of any land acquisition requirements as a result of the proposed 30m rail reserve. We note Appendix E 'Preliminary Land Requirements' in the EIS does not disclose or list any Billbergia's sites for land acquisition to accommodate PLR.

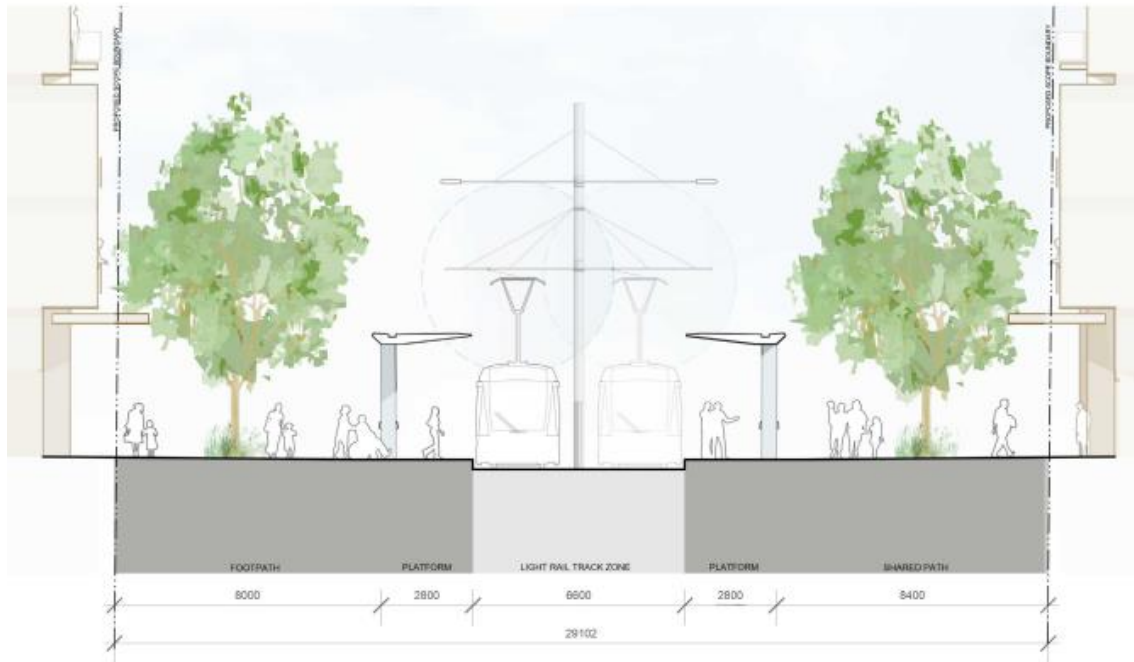


Figure 4: Indicative rail reserve - Sandown Line in proximity to the town centre (Source: TfNSW)

Recommendations

5. Alternative design solutions to be considered to reduce the width of the rail reserve in proximity to the Camellia Town Centre from 30m to 20m.
6. Clarification of any land acquisition requirements for Billbergia's site as a result of the proposed rail reserve in proximity to the Camellia Town Centre.

2.3 Proposed bridge

The EIS proposes a new crossing for the light rail over the Parramatta River from Grand Avenue, Camellia to John Street, Rydalmere as shown in the figure below.

In their 2019 Planning Proposal and in subsequent submissions to various policies and plans including the PLR Stage 1, Billbergia has identified that a bridge further east connecting Thackeray Street in Camellia to Park Road in Rydalmere would be the more appropriate bridge location. This is based on the following reasons:

- there is an existing pedestrian crossing at this location
- it more efficiently connects Camellia to Victoria Road and suburbs further north
- it is more easily adaptable to efficiently serving private vehicles, pedestrians, and light rail simultaneously
- it will likely be the more cost effective as public roads already exist on both sides of the Parramatta River and extend to the foreshore

The Thackeray Street option is supported by specialist traffic consultant reports which were obtained by Billbergia as part of previous master plans for their site. It is also noted that this bridge was proposed as part of Billbergia's VPA offer in their 2019 Planning

Proposal. The VPA proposed to forward-fund and deliver the bridge as part of early stages of development works.

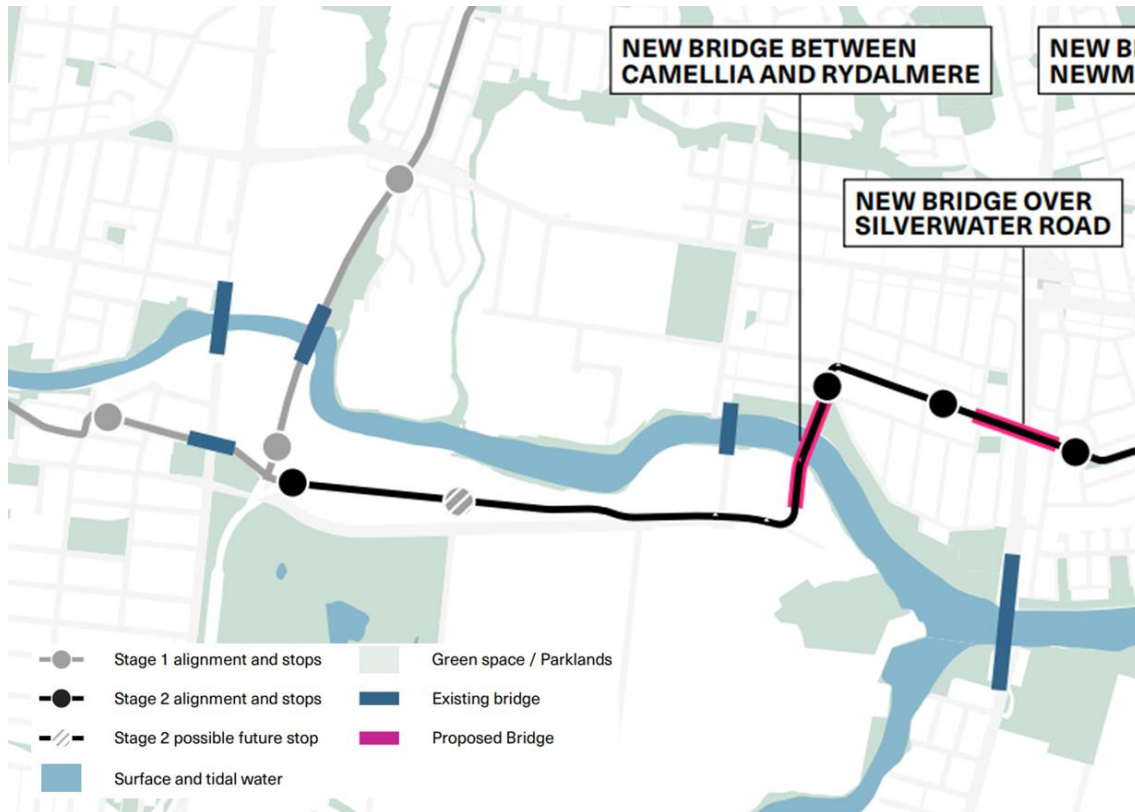


Figure 5: Proposed bridge locations (Source: TfNSW)

Recommendations

7. The proposed light rail bridge crossing to be reviewed and for a crossing between Thackeray Street and Park Road to be considered instead.

3 Conclusion

The Billbergia Group has a strong track record in working closely with state and local government to produce environmentally, economically and socially beneficial developments.

Based on this submission, we recommend that the EIS be amended to re-align with the below recommendations:

1. The final EIS to specify the exact location of the Sandown Boulevard station to allow future planning of surrounding sites.
2. Confirmation that Billbergia's land will not be required as part of the construction or operation of the Sandown Boulevard station.
3. The Sandown Boulevard station to be considered as part of the PLR Stage 2 to ensure the Camellia Town Centre and broader peninsula can be planned appropriately going forward.

4. DPE to engage in discussions with land owners regarding PLR stations in proximity to the town centre.
5. Alternative design solutions to be considered to reduce the width of the rail reserve in proximity to the Camellia Town Centre from 30m to 20m.
6. Clarification of any land acquisition requirements for Billbergia's site as a result of the proposed rail reserve in proximity to the Camellia Town Centre.
7. The proposed light rail bridge crossing to be reviewed and for a crossing between Thackeray Street and Park Road to be considered instead.

Further, given the significance of this project to the urban renewal of the Camellia Precinct, GOP and the City of Parramatta, we request that any amended EIS be placed on further public exhibition.

We look forward to continuing to work with DPE, Council and TfNSW to provide much needed residential accommodation and a new town centre in the Parramatta LGA.

Should you require any additional information, please do not hesitate to contact Michael Woodland on 8413 0398 or email michael@keylan.com.au in the first instance.

Yours sincerely



Michael Woodland BTP MPA
Director