

Department of Planning, Industry and Environment
Transport Assessment
GPO Box 39
SYDNEY NSW 2001

Sent by email: ben.reid@dpie.nsw.gov.au

Dear Mr Reid,

Re: Submission on Cabramatta Loop Project (SSI 9186)

Thank you for the opportunity to provide a submission on the above State Significant Infrastructure (SSI) project application. The project will comprise the construction and operation of a passing loop on the Southern Sydney Freight Line (SSFL). This is to enable freight trains, up to 1,300 metres long to pass each other and to travel in either direction.

The project will be partly located within the existing rail corridor between the Hume Highway and Cabramatta Road East overbridge in the suburb of Warwick Farm and Cabramatta. The project will further include works in Broomfield Street and Jacquie Osmond Reserve, adjacent to the rail corridor. Council has a number of specific concerns in regards to the project which are outlined below.

Economic Impacts

It is anticipated that the project will create 80 jobs (up to 220 jobs during possession periods) during the construction phase. In addition to that, there are potential economic activation benefits through local businesses supplying goods and services for the project.

A local employment or procurement statement should be prepared by the proponent to materialise these benefits for the Liverpool LGA. A win-win situation can be developed via tapping into the Liverpool and Fairfield skilled worker base which will not only positively affect the local economy but will also ensure less traffic is generated by workers travelling from outside of the LGA to the project site.

Open Space and Recreation

The project is planned to acquire a considerable area of the Jacquie Osmond Reserve for widening of the rail corridor along its eastern side and for establishing work sites during the construction phase. The location of work sites and the loss of open space due to the proposed corridor widening will disrupt the existing open space and recreation network within the area.



Figure 1: Proposed construction work sites within the Liverpool LGA

Residents of the area utilise the existing open space and sports facilities in the locality for recreation purposes. These are namely Jacquie Osmond Reserve, Stroud Park, Warwick Farm Recreation Reserve, Dwyer Oval and Cabramatta Creek Reserve. The partial loss of Jacquie Osmond Reserve will increase pressure on existing open space to support the recreational needs of residents.

The project work site 'C3' proposed to be located within Jacquie Osmond Reserve, will impact 3 of the 12 softball diamonds available for use by the Southern Districts Softball Association. This will affect seasonal and event usage of these fields. The proposed permanent acquisition of a 5m strip of the reserve to the eastern side of the rail corridor will impact the softball diamond safety fencing, synthetic grass batting squares and the overall diamond dimensions. Pushing the three fields eastward will have a flow-on effect on the dimensions of remaining diamonds.

This loss of public recreation space warrants an effective offset strategy to mitigate the resulting impacts. It would be beneficial for the proponent to investigate opportunity to embellish nearby sports grounds in order to alleviate the loss of recreational space/facilities. Other options for the proponent may be to consider the provision of temporary diamonds elsewhere within proximity of the site for the construction period.

Following the removal of the 'C3' compound, Council will need to be satisfied that the diamonds are returned to a satisfactory condition. Wherever possible, traffic and storage of materials on the diamonds should be avoided. Any impacts on the diamond safety fencing and concrete will need to be remediated and all construction related materials must be removed from the site.

Any slope/batter retaining walls or other structures supporting the railway line should consider impacts on visual amenity.

Cycleway and Access

It is understood from the project plan that public access to open space and recreation facilities will be disrupted due to the construction works. Currently, the access to the softball facility at Jacquie Osmond Reserve is via the rail bridge underpass located near Cabramatta Creek. Proposed work site 'C3' will disrupt public access into the reserve via the underpass. The proposed work site 'W2' will also impede the Cabramatta pedestrian and cycleway Bridge and will disrupt the existing Liverpool to Parramatta cycleway. This is a key cycle-route in Western Sydney, and suitable signposted diversions will need to be put in place.

Removal of the existing shared path over Cabramatta Creek will require construction of a suitable replacement, which maintains connectivity between Station Street and Broomfield Street prior to the existing bridge being removed. Vehicular access to Jacquie Osmond Reserve will also need to be maintained at all times.

The construction works will further require access to Stroud Park for work site 'C2' and 'W1' on the western side of the railway line. The existing access way at this location provides access to the softball facility at Jacquie Osmond Reserve and to the surrounding recreational spaces. The access road suffered significant damage during the previous construction of the freight line and the access way was not reconstructed at the end of the project.

The current project setup between the stockpile site 'C2' and the truck turning circle 'W1' will create an exclusive use of this access road. This will lead to severe degradation of the road surface due to construction vehicles movements. Council requires that the proponent conduct a dilapidation survey of this access road section and seek agreement with Council to reseal this road at the end of the project. This will ensure the asset retains its functionality for the public and the users of the sport facility.

Air Quality

Potential minor increase in air pollutants in the locality has been acknowledged in the associated technical studies of the project. One of the concerns is the length of time freight train engines will be waiting in the loop and creating emissions. This may affect neighbouring businesses and users of public open spaces. This aspect of the project should be considered in the operational planning of the rail freight services. It is recommended that air-quality sensors are installed at appropriate locations.

Noise Impact

It is identified that the submitted Noise Impact Assessment study did not include the potential noise impacts of the project on the softball facility at Jacquie Osmond Reserve. Council need to be assured that the operational noise from a train in the loop position (72 trains per day) is investigated to determine whether a sound barrier is needed. It should be noted that the existing noise barrier along the eastern side of the railway line is a retaining wall. Due to the elevated position of the track, the existing retaining wall does not attenuate rail noise to the field. Given that the proposed acquisition will result in a 5m

strip into the reserve, the operational noise of the loop will be much closer to the field and will potentially create significant noise impacts.

Flooding and Water Quality

The Hydrology and Flooding Impact Assessment report identified that there would be some adverse flooding impact at Broomfield Street in Cabramatta within Fairfield LGA. The report further indicated 690 cubic meters of loss of flood storage due to the proposed project but did not mention whether this loss of flood storage was compensated. Compensatory flood storage is required to prevent flooding within the Cabramatta Creek and Georges River Floodplain.

Hydrologic and hydraulic modelling for the project identified minor increase in flood levels however the increase is only up to 10 mm in the 1% AEP flood event and is considered satisfactory.

The Water Quality Assessment report associated with the Environmental Impact Assessment did not consider any water quality treatment system. The proposal should consider Water Sensitive Urban Design (WSUD) principles within the project. The performance of water quality treatment drains should be assessed using Council's MUSIC link.

Biodiversity

Council reviewed the Biodiversity Development Assessment Report (BDAR) (GHD, August 2019) prepared for the project which formed technical report 4 of the Environmental Impact Assessment.

Given the apparent limited impacts on ecological values, it is considered that the BDAR adequately addressed pertinent matters. It is recommended that the mitigation measures included within the BDAR are adhered to in the subsequent development stages of the project.

Tree Management

Several mature trees within the project area are marked for removal for the construction of the loop and the associated infrastructure development. It is recommended that all trees to be removed be replaced, with 3x trees / per tree that will be removed. Proposed tree species are to be assessed by Council.

The Main Southern Line corridor along Station Street in Warwick Farm, which fronts onto residential properties, is devoid of any significant vegetation. It is recommended that the proposed landscaping for the project be extended to include this section of the Main Southern Line corridor inclusive of planting additional suitable large trees to provide visual relief of the rail corridor.

Land Acquisition

The project includes acquisition of Council owned and managed land adjacent to the project site. Permanent land acquisition for the project will involve:

- partial acquisition of one lot (Lot 2 DP250138) owned by the Department of Planning, Industry and Environment (DPIE) and under care, control and management by Liverpool City Council (Jacquie Osmond Reserve);
- Full acquisition of one lot (Lot 10 DP776165) and partial acquisition of another lot owned by Liverpool City Council at the southern end of the project site.

Permanent land acquisitions will be subject to the Land Acquisition Act on a just-terms basis. Council favours the proponent's preference through negotiation under the same legislative framework with divestment costs covered by the proponent.

Temporary land acquisitions are proposed by the proponent for establishing work sites for a duration of two years. Council prefers that temporary land acquisitions to be on a leased basis for the term of the proponent's project, such as the use of exclusive triple net lease agreement (i.e. lessee responsible for all statutory, operational and make good costs).

This lease agreement will be with the proponent over Council owned and managed lands for a two year term. Terms of this agreement need to be negotiated with Council and to be approved subject to the resolution of Council

Traffic

Council requires the proponent to minimise impacts from construction traffic. A detailed Construction Traffic Management Plan (CTMP) is to be submitted to Council for review and approved prior to the issue of a Construction Certificate.

The CTMP should include, but not be limited to the following:

- Construction traffic and access management plan and heavy vehicles haulage routes;
- Temporary traffic management measures to mitigate traffic impacts of construction works in consultation with both Liverpool and Fairfield Councils;
- Traffic control plans associated with any road works;
- Workers transportation and on-site parking management;
- Oversize vehicle permits (if required);
- Mitigation measures to minimise the impacts of construction traffic on local residential streets including noise impacts.

The CTMP is to outline the need for a Road Occupancy Permit issued by Council or Road Occupancy Permit issued by the Transport Management Centre. Works within the road reserve shall not commence until the construction traffic management plan has been endorsed.

Prior to work commencing -

- The developer shall seek road occupancy, road opening permits, and works zone approval from Council (if required) prior to undertaking any works within the public road reserve. The application forms are available on Council's website or can be requested from Council's Customer Services.


- Prior to commencement of any works a Traffic Control Plan including details for pedestrian and cyclist access management, shall be prepared in accordance with AS1742.3 "Traffic Control Devices for Works on Roads" and the Roads and Maritime Services publication "Traffic Control at Worksites" and certified by an appropriately accredited Roads and Maritime Services Traffic Controller, and submitted to Council and the PCA for approval.
- Traffic control measures shall be implemented during the construction phase of the development in accordance with the certified plan. A copy of the plan shall be available on site at all times.
- A copy of the Traffic Control Plan shall accompany the Notice of Commencement to Liverpool City Council.

During construction -

- The endorsed CTMP is to be implemented.
- All works within the road reserve are to be at the applicant's cost and all signage is to be in accordance with the RMS Traffic Control at Worksites Manual and the RMS Delineation Guideline.
- Applications must be made to Council's Traffic and Transport Section for any road closures. The applicant is to include a Traffic Control Plan, prepared by a suitably qualified person, which is to include the date and times of closures and any other relevant information.
- Council's assets such as footpath and reserve should be protected at all times. Any damages should be rectified to Council satisfaction.

If you have any questions please contact Masud Hasan, Senior Strategic Planner on 8711 7383.

Yours sincerely

A handwritten signature in black ink, appearing to read 'David Smith', with a stylized flourish at the end.

David Smith

Manager Planning and Transport Strategy