



CUMBERLAND
CITY COUNCIL

11 May 2022

Attention: Director – Transport Assessments
Planning and Assessment
Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Our reference: CS-205
Contact: Daniel Cavallo
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Dear Sir/Madam

**CUMBERLAND CITY COUNCIL SUBMISSION ON THE SYDNEY METRO WEST – RAIL
INFRASTRUCTURE, STATIONS, PRECINCTS AND OPERATIONS (SSI-22765520)**

Cumberland City Council appreciates the opportunity to provide feedback on the Environmental Impact Statement (EIS) and accompanying documents for the Sydney Metro West rail infrastructure, stations, precincts, and operations.

The delivery of the Westmead transport interchange hub and associated infrastructure, public domain and amenity improvements will support the revitalisation of Westmead South to become a liveable and sustainable neighbourhood that complements the health and innovation district to the north.

Council acknowledges the consultation undertaken to date and recommends this continue with Council, key stakeholders and the community during the detailed design, construction, and operation phases. Council would also appreciate further notice of upcoming community consultation and workshop sessions before they take place.

Council's submission focuses on our key issues, in particular the need for a southern pedestrian access to metro from Westmead South, investigation of commuter car parking in close proximity to the station and a review of bus services to ensure residents can access metro. Other issues raised include the Westmead metro station layout and design, the critical role of the Sydney metro site in the transformation of Hawkesbury Road, transport and traffic, business impacts, heritage, noise and vibration and contamination.

Thank you for the opportunity to comment, and Council welcomes the opportunity to continue working collaboratively as a key stakeholder.

Yours faithfully


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Cumberland City Council Submission on the EIS for Sydney Metro West – Rail Infrastructure, Stations, Precincts and Operations (SSI-22765520)

1. Overall Comments

Council's submission is grouped into themes, consisting of *matters for consideration* and *recommendations*.

Council's input is somewhat limited on the Westmead station and the areas surrounding the station due to several matters still being considered by Sydney Metro.

These matters are important to Cumberland City, particularly as the development of the Sydney Metro and Sydney Trains networks (herein called 'transport hub') and the site bounded by Alexandra Avenue, Hawkesbury Road, Bailey Street and Hassall Street (herein 'metro site') will catalyse development in Westmead South.

Council, therefore, requests our active involvement in the future design and development of:

- the additional southern station entrance, and transport interchange facilities,
- the configuration and layout of Alexandra Avenue,
- the location and design of the two services and utilities building (associated with Sydney Metro operations) south of Alexandra Avenue,
- the layout and design of the public domain (to be provided south of Alexandra Avenue and east of Hawkesbury Road),
- the interface of built elements on the metro site and the public domain,
- the upgrades to Hawkesbury Road, Bailey Street and Hassall Street,
- review, and where needed, rerouting of bus routes to enable our residents to access Westmead Metro, and
- provision of commuter parking in the precinct to support current travel patterns and demand in the Westmead area.

Please find our specific comments for the following:

- Westmead Station Indicative Layout and Design
- Transforming Hawkesbury Road and Surrounds
- Transport Hub and Precinct Design
- Transport
- Non-Aboriginal Heritage
- Operational and Construction Noise and Vibration
- Contamination
- Erosion and Sediment Control
- Air Quality
- Business Impacts
- Flooding and Stormwater
- Biodiversity

2. Westmead Metro Station Indicative Layout and Design

Council supports the indicative layout and key design elements of Westmead metro station, noting the design of the metro station will be subject to further detailed design development. In particular, Council strongly supports:

- A new aerial station concourse along Hawkesbury Road, providing access to the Sydney Trains and Sydney Metro platforms, including:
 - station concourse building, with canopy on the eastern side of the Hawkesbury Road overbridge, rising two to three storeys (about nine metres high) aboveground
 - an upgrade to the western side of the existing Hawkesbury Road overbridge
- Escalators and/or stairs and lifts between the Sydney Trains and underground Sydney Metro platforms
- Public domain areas, including:
 - new public plazas adjacent to the proposed station, south of Alexandra Avenue, and east of Hawkesbury Road
 - upgraded public domain around the station, along impacted streetscapes and surrounding the future development footprints
 - the proposed through-site link open 24 hours a day at ground level and lined with active uses between Alexandra Avenue and Bailey Street to enable north-south permeability through the block
 - two station services and utility buildings south of Alexandra Avenue, each rising five to six storeys (about 18 metres high) above ground with active ground floor components, high quality built forms and integration of public art
 - structural elements for the space for non-station uses (noting that fit-out and use of these spaces would be subject to separate approval, where required)
- Station precinct and interchange elements including:
 - Bus interchange and shelters located on both sides of Alexandra Avenue
 - Combined kiss and ride and point to-point vehicle facilities
 - Bicycle parking at Railway Parade
 - Upgrades to the surrounding road network, including new landscaping, bicycle path along Bailey Street and reinstated pedestrian crossing at Railway Parade

2.1 Matters for Consideration

There are several matters, however, that require consideration at this stage, prior to detailed design. These are outlined as follows:

Additional Southern Station Entrance

Council notes that Sydney Metro is continuing to investigate the opportunity for an additional southern station entrance.

It should also be noted that Figure 7-3 in Chapter 7 shows Metro station entries on Alexandra Avenue and Railway Parade, which contradicts with the single Metro station entry shown on Figure 7-1. Council seeks clarification on this matter.

Based on the location of the Sydney Metro station box, users travelling from the south of the transport hub would be required to travel north to the Hawkesbury Road overbridge entry and then proceed south to access the Sydney Metro platforms. This single, circuitous access path to the metro platforms results in several disadvantages:

- additional travel distance and travel time for travellers with origins or destinations to the south or interchanging with bus services on Alexandra Avenue, and the inconvenience associated with this
- higher volumes of pedestrians unnecessarily crossing Alexandra Avenue to access the entry on the Hawkesbury Road overbridge, which will have an adverse impact on safety and network performance (with buses and emergency services expected to use Alexandra Avenue)
- a lost opportunity for passing trade to support local retail within the proposed public domain

The 2036 modal breakdown of forecast access and egress during the AM peak hour indicates that most access and egress trips would be by walking and with a sizeable increase in dwelling numbers expected in Westmead South, an additional southern station entrance is critical, with the benefits outlined below.

- An additional southern station entrance would ensure travellers with origins or destinations to the south or interchanging with bus services on Alexandra Avenue have safe and equitable access to the transport hub.
- High pedestrian flow, particularly during peak periods, could be better managed through an additional southern station entrance as it would reduce pedestrian volumes crossing Alexandra Avenue to access the transport hub and support true active transport.
- An additional southern station entrance would allow travellers to use the underground concourse to navigate the broader station area without crossing Alexandra Avenue at-grade.
- An additional southern station entrance would increase the resilience of the network by providing an alternate entrance that could be relied on in cases of emergencies and/or should there be a need to shut down the entry at the Hawkesbury Road overbridge.
- An additional southern station entrance would enable quicker and more convenient transfers for customers interchanging from the bus stops on Alexandra Avenue to the transport hub.
- Given the location of the station box, a station entrance that is located on the block south of Alexandra Avenue would be closer to the metro platforms and would better serve users of the service.
- The public domain and the retail/commercial/community infrastructure in the metro block presents a significant opportunity for integration of the additional southern station entrance.

Transport Interchange Facilities to support travellers with origins or destinations to the south

Figure 7-1 of Chapter 7 outlines transport interchange facilities to support users of the transport hub. The following facilities have been proposed:

- Reinstatement of the pedestrian crossing on Railway Parade
- Bicycle parking on Railway Parade
- Taxi bay on Railway Parade
- Kiss and ride bay on Railway Parade
- Proposed accessible kiss and ride bay on Railway Parade

These facilities would be concentrated to the north of the transport hub and would require travellers with origins or destinations to the south to travel longer distances to access them, increasing travel time and distance and pedestrian flows to the north, and which would have an adverse impact on safety and network performance.

There is no pedestrian crossing on the northern approach of the Hawkesbury Road traffic signals. A pedestrian crossing should be considered at this location to assist commuters exiting the metro station onto Hawkesbury Road (north of Alexandra Avenue) to cross and reach the northern side of Alexandra Avenue (west of Hawkesbury Road).

Final Configuration of Alexandra Avenue and Changes to the Traffic Network

Council strongly supports the retention of the existing Alexandra Avenue alignment.

The EIS identifies the potential narrowing and regrading of Alexandra Avenue to accommodate the new bus interchange. This would improve accessibility by addressing the current steep gradient between Hawkesbury Road and Hassell Street. If the road is regraded, Council's preference is that access to the public domain south of Alexandra Avenue is at street level with no or minimal steps. This would ensure accessibility and permeability to the public domain within the metro site is maintained.

2.2 Recommendations

- Council strongly recommends the provision of an additional southern station entrance, potentially to be provided within the proposed public domain, and that would connect to the underground paid concourse (which would require extension south).
- Council recommends the provision of the following facilities:
 - Pedestrian crossing/s to be investigated south of the transport hub,
 - Bicycle parking, near the potential additional southern station entrance,
 - Taxi bay, near the potential additional southern station entrance,
 - Kiss and ride bay (accessible and otherwise), near the potential additional southern station entrance, in a manner that does not adversely impact on operations along Hawkesbury Road and Westmead Public School,
 - A signalised pedestrian crossing from the north-east corner of Hawkesbury Road and Alexandra Avenue to the north-west corner of Hawkesbury Road and Alexandra Avenue.
- Council requests detail regarding the final configuration of Alexandra Avenue so that Council can provide further input.

3. Transforming Hawkesbury Road and Surrounds

The transport hub and the metro site play a critical role in catalysing the transformation of Hawkesbury Road to become a green, safe, and walkable high street.

In accordance with *Cumberland 2030: Our Local Strategic Planning Statement*, of particular importance to Council is the activation and enhanced pedestrian amenity along Hawkesbury Road from the metro site (future Westmead Town Centre) to the southern part of the Westmead South precinct, to mirror the activation and improvements to pedestrian amenity that will take place north of the transport hub.

Towards this end, Council strongly supports:

- the creation of new public domain to the south of Alexandra Avenue and east of Hawkesbury Road,
- the proposed 7-metre-wide concourse on the Hawkesbury Road overbridge to strengthen the connection between north and south Westmead,
- the proposed cycleway on Bailey Street to connect to the wider cycle network,
- the proposed provision of active uses at ground level at the metro site,
- enhanced verge opportunities along both Hawkesbury Road and Alexandra Avenue.

3.1 Matters for Consideration

Several matters that require consideration are outlined as follows:

Transforming Hawkesbury Road

Given the construction surrounding Hawkesbury Road and Alexandra Avenue, clarification is sought on whether realignment of Hawkesbury Road, particularly near its intersection with Alexandra Avenue, would take place to support improved pedestrian amenity on both sides of Hawkesbury Road and the futureproofing of Hawkesbury Road for a future T-way connection or light rail extension further south.

Development of the metro site presents an opportunity to realign Hawkesbury Road to accommodate new public domain at the metro site as well as widened footpaths and a cycleway along Hawkesbury Road. Clarification is sought on whether the metro site will be setback to achieve this.

Public Domain/Metro Plaza

The proposed public domain is an important component of the metro site, which through provision of retail, commercial and community facilities, will transform into the Westmead Town Centre and serve the daily needs of the population of Westmead South and beyond. Further consultation on the size, proportion, layout, and design of the public domain and uses that interface with this public domain will be critical in ensuring this space is welcoming, safe, vibrant, and multi-functional.

Cycle routes

The provision of a separated cycleway along Hawkesbury Road is critical to ensure safety for cyclists travelling along Hawkesbury Road to access the transport hub or the northern parts of the Westmead Precinct.

Figure 7-1 (Chapter 7) shows that multiple crossings of Hawkesbury Road would be required by cyclists navigating the station area and the Hawkesbury Road overbridge when coming/going from the eastern side of Hawkesbury Road on both the northern and southern sides of the rail line. This proposed route is inconvenient and disruptive for people travelling on bicycles through this area.

Although Council acknowledges the competing demands for space on the eastern side of the Hawkesbury Road overbridge, cyclists are likely to use the at-grade crossings of Alexandra Avenue and Railways Parade and travel along the pedestrian path or bus lane on the eastern side of Hawkesbury Road. This is bound to create conflicts and impacts on traffic flow (both pedestrian and bus).

A bicycle route that travels across the eastern side of Hawkesbury Road overbridge, in front of the station entrance, would ensure ease of accessibility and intermodal integration.

Council supports the proposed bicycle route on Bailey Street, and clarification is sought on whether the proposed cycleway would be on or off road.

3.2 Recommendations

- Council strongly recommends that the western part of the Metro site be setback to allow:
 - reconfiguration of Hawkesbury Road, particularly near its intersection with Alexandra Avenue,
 - the provision of widened footpaths on the eastern side of Hawkesbury Road, and
 - the future provision of widened footpaths on the western side of Hawkesbury Road in front of Westmead Public School (between Alexandra Avenue and Austral Avenue)
 - the potential future provision of a T-way or light rail corridor, as identified in State and local strategies
- Council recommends a minimum 7m wide public domain area adjacent Hawkesbury Road to accommodate pedestrian movements as well as outdoor dining.
- Council requests the powerlines on the western side of Hawkesbury Road (near Alexandra Avenue) to be placed underground as part of the upgrade works along Hawkesbury Road.
- Council recommends that tree plantation take place along Hawkesbury Road and Alexandra Avenue to mitigate urban heat, with trees sizes recommended to be a minimum of 400L at time of establishment.
- Council requests active engagement in the ongoing design of the public domain.

- Council strongly recommends that the layout, orientation, and design of the public domain be considered holistically within its wider context, and should integrate seamlessly with:
 - the provision of a second additional southern station entrance and the required facilities to support travellers with origins or destinations to the south as outlined above,
 - the setback of the western edge of the metro site to accommodate active frontage and improved pedestrian amenity,
 - the services and utilities buildings (south of Alexandra Avenue) that the EIS identifies would be of five to six storeys in height and would require articulation and activation at the ground level,
 - development on the rest of the metro site, which would include mixed uses (consisting of retail, commercial, community) and would provide for the daily needs of the community in Westmead South (although this is subject to future approval processes), and
 - active transport connections, particularly along Hawkesbury Road, Alexandra Avenue, Bailey Street and Hassall Street.
- Council recommends that the plaza embrace placemaking opportunities and be engaging and relevant to the local community.
- Council recommends active uses at the ground level on all sides of the services and utilities building, but particularly on the northern and western facades to activate the public domain and to achieve a gateway experience to Westmead South. The northern and western facades of the services and utilities building proposed at the intersection of Alexandra Avenue and Hawkesbury Road are in the direct sightlines from the Hawkesbury Road overbridge entry.
- Council recommends the plaza be oriented to receive maximum sunlight during winter (the potential overshadowing by adjacent buildings is to be considered) and to avoid any wind tunnelling effects, to ensure visitor comfort and amenity.
- Council recommends the formulation of urban heat mitigation strategies as the plaza will be exposed to both winter and summer sun.
- Council recommends that a separated cycleway on the western side of Hawkesbury Road and south of Alexandra Avenue (as identified in multiple studies carried out by various government agencies) should form considerations in how the transport hub will be accessed from the south and this cycleway should also be indicated in relevant parts of the EIS (e.g., Figure 7-1).
- The provision of a cycleway along the eastern side of Hawkesbury Road from Railway Parade and extending to Bailey Street should be explored in addition to that provided on the western side of Hawkesbury Road (from Alexandra Avenue heading north) to ensure the utility of the proposed bicycle route is not undermined.
- Council recommends the bicycle route along Bailey Street be separated from traffic and continue east to Parramatta Park and connect to Park Parade, which would then connect to the wider regional network to the east.
- Council recommends that the proposed cycleway along the Hawkesbury Road overbridge (both eastern and western sides) and the eastern side of Hawkesbury Road

(between Alexandra Avenue and Bailey Street) and along Bailey Street be delivered during the construction of the Westmead metro station and the development of the metro site.

4. Transport Hub and Precinct Design

Council generally supports the high-level place and design principles and urban design strategies identified in the *Design Guidelines* (Appendix E).

4.1 Matters for consideration

Place and design principles

- One of the place and design principles is to provide safe, equitable and legible connections with the transport hub and active transport, buses, and Parramatta Light Rail. Council strongly recommends the provision of an additional southern station entrance (as discussed above) to provide safe, equitable and legible connections for travellers with origins or destinations to the south.
- In addition to providing a gateway to the Westmead Health and Education Precinct, the proposal should also provide a gateway to the emerging Westmead Town Centre to the south and the neighbourhood south of the railway line bounded by Alexandra Avenue to the north, Parramatta Park to the east, Bridge Road to the west and Great Western Highway to the south (herein called 'Westmead South').
- Council strongly supports greater activation along Hawkesbury Road connecting North and South Westmead. Towards this, Council recommends widening of the footpath along the eastern side of Hawkesbury Road (between Alexandra Avenue and Bailey Street) to be a minimum of 3m excluding the public domain area.
- The design of the public domain and its interface with the built form on the metro site will be critical to the creation of an inviting public place. Council, therefore, requests details of the public domain and the built form of the two services and utilities buildings so that Council can provide further feedback.

Land use and function

- Council supports the creation of the transport hub as a local landmark and a recognisable focal point. Council recommends this be achieved through an iconic built form that would signal a gateway into the Westmead Precinct.
- Council supports the provision of a diverse range of local businesses and retail as well as hospitality, accommodation, and community activities at the metro site to support a vibrant day and night-time economy and to activate the public domain, creating an 18-hour precinct. In addition to these uses, ancillary health, innovation, and education uses should also be explored at the metro site, including the potential provision of a full-format supermarket.

Places and Spaces

- The views along Hawkesbury Road (south) when exiting the station are important in achieving a sense of arrival and way finding, particularly for travellers with origins or

destinations to the south. Council, therefore, recommends consideration of the following matters:

- It is noted in the EIS that the two services and utilities building proposed to the south of Alexandra Avenue will be five to six storeys in height. They will, therefore, be of a similar height or taller than the surrounding buildings in the adjacent blocks and if not designed well, could have a significant adverse impact on the public domain area and the approach into Westmead South.
- As far as possible, Council recommends the services and utilities functions to be concentrated in the building located at the intersection of Alexandra Avenue and Hassall Street to minimise the building footprint of the services and utilities building located at the intersection of Alexandra Avenue and Hawkesbury Road. This would assist in the provision of an additional southern station entrance and an increased amount of public domain in the metro block. Services and utilities, including substations, are not to be visible from the public domain. The provision of public art integrated with the building design and public domain is also recommended.
- It is important for the services and utilities buildings to be of a human scale and articulated to create interest (no blank walls should be provided) with high quality materials and finishes to be used. Further, ground floor (fine grain) uses should be provided on all edges of the services and utilities building as far as possible. This should be through tenancies that attract passing trade and with seating overlooking the public domain edge, particularly along Alexandra Avenue, Hawkesbury Road and Bailey Street, to ensure street activation.
- Despite the location of the bus interchange, the ground floor level along Alexandra Avenue should be activated as it is oriented to the north and would be best placed to accommodate outdoor dining compared to Bailey Street, which would receive no direct sunlight.
- The public domain and its interface with the built form on the metro site will assist in creating a sense of arrival into Westmead South. Council, therefore, recommends consideration of the matters identified in 3.2 above.
- The potential for provision of heritage interpretation relating to the history of Westmead in the public domain and on the façades of the services and utilities buildings should be explored.
- Council supports the provision of a publicly accessible through-site link open 24 hours a day at ground level and lined with active uses to enable north-south permeability through the block. Council recommends that this through-site link be of a sufficient width to accommodate active uses and potential entries to a retail anchor such as a full format supermarket.

Access and Connectivity

- Council supports the easy and intuitive transfer between the two train modes and management of the crossflows between customers entering or exiting the station. The lack of a second additional southern station entrance and the required facilities to support travellers with origins or destinations to the south as outlined above results in

concentration of transfers and crossflows between customers via the Hawkesbury Road overbridge entry.

- Council supports the maximisation of footpath widths along Hawkesbury Road and Alexandra Avenue to accommodate pedestrian movement and opportunities for tree planting and landscaped areas. Council recommends the footpath width along Hawkesbury Road be a minimum of 3m (not including the public domain areas).
- Council supports the reconfiguration of Alexandra Avenue, Bailey Street and Hassall Street as pedestrian focused streets by improving amenity and connectivity between the station precinct and the surrounding neighbourhood. Council supports the signalisation of the Bailey Street and Hassall Street intersection, and the Bailey Street and Hawkesbury Road intersection to facilitate pedestrian movements (particularly as traffic will divert from Alexandra Avenue to Bailey Street). Council also recommends the provision of pedestrian crossings south of the transport hub be investigated.
- Council supports the provision of wider verges on both sides of Hawkesbury Road, Alexandra Avenue, Bailey Street and Hassall Street to accommodate widened footpaths, landscape areas, street trees, social interaction, and outdoor dining opportunities. Council recommends a minimum width of 1.4m on Bailey Street and Hassell Street.

4.2 Recommendations

It is recommended that that matters raised by Council are considered in the finalisation of the transport hub and precinct design.

5. Transport

The information on transport has been reviewed by Council, and a range of matters identified for further consideration.

5.1 Matters for consideration

Approvals

Council advises that approval from the Cumberland Traffic Committee and Council is required for following:

- All proposed traffic facilities including regulatory signs and line marking
- All temporary road closures / other temporary and permanent traffic measures

Construction Traffic Management Plans and Road Occupancy applications should be submitted to Council for assessment. The contractor should contact Council for further information.

Changes to Alexandra Avenue

Allowing only buses, taxis and emergency vehicles through Alexandra Avenue will divert other traffic through Bailey Street and Hassall Street. This is likely to have significant impacts on these streets and intersections along the route.

Any changes to Alexandra Avenue between Hawkesbury Road and Hassall Street, including the potential for this section of road to be regraded and narrowed and used for bus and emergency services only, will require consideration of the impacts of redirected traffic and Council approval. Modelling of the potential changes to the traffic network due to redirected traffic will be required along the route. Further, a traffic management plan should be submitted to TfNSW for approval.

Lower Speed Limits

As with Railway Parade, a lower speed limit of 40km/hr should be considered for the roads around the metro station block due to high pedestrian volumes. At a minimum, Alexandra Avenue, Bailey Street, Hassall Street and sections of Hawkesbury Road should be considered.

Removal of Parking Spaces

Removal of parking spaces on local roads should be kept to a minimum to avoid major impact to residents.

Construction Vehicles

To ensure the safety of school children and other pedestrians and to minimise impacts on traffic during school drop-off and pick-up times, construction vehicle numbers exiting via Hawkesbury Road should be avoided or reduced to a minimum.

Council reiterates that heavy vehicles should not travel through or wait on local residential streets at any time, as mentioned.

As noted in the EIS, Council supports the carrying out of a condition survey before and after construction, and the repair of any damage caused due to construction activities.

Commuter car parking

It is noted that there is currently limited parking available at Westmead to support commuter demand for public transport services at this location. The introduction of metro to Westmead will provide an additional form of public transport service that will make the precinct more attractive to use.

At the present time, the broader public transport network does not adequately support non-car access to this location, with missing links to adjoining suburbs, such as Wentworthville and Merrylands. As a result, car travel is used for local residents to access the train network.

The current proposal for Sydney Metro West does not provide commuter car parking at Westmead. While the rationale for this approach is acknowledged, it does not consider current travel patterns and demand for access to Westmead in the absence of other services. It is requested that investigations are undertaken for commuter car parking to be provided at Westmead to support existing and future transport networks, and for Council to be involved in these investigations with State agencies.

Bus routes

In line with the above issue raised about commuter car parking, the adequacy of bus services for residents likely to use or encouraged to use metro needs to be reviewed. To further encourage a modal shift to public transport, any changes required to the bus routes to provide further bus services for residents in nearby areas to metro and back should be reviewed and implemented.

5.2 Recommendations

It is recommended that that matters raised by Council are considered in the finalisation of the transport management and operational element associated with the project.

6. Non-Aboriginal Heritage

Council has reviewed the built heritage impact assessment of the construction and operation of the proposal on built heritage items within the study area at Westmead metro station. No non-negligible impacts are identified for heritage items or areas in Cumberland City Council.

Impacts on the heritage significance of the listed Westmead Public School have been assessed to be neutral or negligible, and for the most part, temporary. Council does not express concern or opposition to the project on heritage-related grounds.

Buried sandstone road surface of local archaeological heritage significance has been identified at numerous locations around the project site (as highlighted in Figure 26 and Table 17, Technical Paper 5). Council requests that care is taken throughout the project works to ensure unnecessary damage/destruction is avoided.

The heritage and archaeology design objectives, principles, and guidelines outlined in Appendix E – Design Guidelines are welcomed and supported.

It is also noted that Council has undertaken early consultation on a range of potential heritage items and potential heritage conservation areas, including locations in Westmead. Council is reviewing submissions received and undertaking further analysis prior to a recommendation on the way forward regarding this proposal.

6.1 Matters for consideration

Whilst Council welcomes and supports the development of the draft Heritage Interpretation Strategy, Council recommends the integration of heritage interpretation relating to the history of Westmead be strengthened at the Westmead transport hub and public domain.

Council supports the identification and categorisation (within the selected sub-themes) of 'key stories' for the Westmead station area. Unfortunately, the approach proposed for interpretation and story-telling at Westmead station does not appear to emphasise the presence of these 'key stories' and the heritage of the area in a corresponding manner. Council has several concerns relating to this:

- The 'key interpretative devices' recommendations do not make clear what potential heritage interpretations may actually be provided on-site, and those suggested for Westmead are quite vague and seem to simply relate to aspects of station construction that will occur regardless. There is a clear risk that nothing substantive and/or appropriately tailored/localised will be delivered.
- Whilst 'General stories relating to the Burramattagal' is identified as one of three 'Key stories' of the area around Westmead station that are proposed to not be told for the sake of avoiding potential duplication, unfortunately, no example is given of how 'General stories relating to the Burramattagal' are already being told in the Westmead area. This raises questions and concerns about its omission and needs further consideration.
- There are three opportunities identified in the SWOT analysis, which are not reflected in the 'key interpretative devices' recommendations:
 - Opportunity to engage in a program of public art
 - Opportunity to integrate interpretation into an infrastructure in an innovative and creative way
 - Opportunity for truth-telling relating to the abuse of women and children in institutions

Whilst the last of these three opportunities also has identified risks, the suggested consideration of these is not included in the 'key interpretative devices' recommendations. It is requested that the draft Heritage Interpretation Strategy (especially the 'key interpretative devices' recommendations) be revised to address these gaps.

The delivery of Sydney Metro West provides a significant opportunity to deliver a tailored and bespoke celebration of local heritage. Council requests that this opportunity be re-examined for the benefits of local residents and visitors to Westmead. It will be the terminus of the Metro West line for the foreseeable future and is a key gateway for a host of destination sites (i.e., education and health institutions) that will be attracting visitors from all over NSW, Australia, and the world (a note that should also be reflected in the 'Audience' section).

6.2 Recommendations

It is recommended that further consideration of heritage items is undertaken in accordance with the comments provided by Council.

7. Operational And Construction Noise and Vibration

Council notes that the construction works for the Westmead metro station are proposed to take a total of four years with the nearest sensitive receivers including residential, commercial and education facilities.

It is noted in the EIS that receivers who are located directly adjacent to the rail corridor, including on Alexandra Avenue and Railway Parade, would be exposed to 'high' noise impacts. Moderate to high sleep disturbance impacts are predicted at several of the nearest

residential receivers including when noise intensive equipment will be used, including for rail possessions for above ground rail and brownfield work and excavation.

Westmead Public School has been identified as a receiver, which will be moderately impacted by construction noise impacts.

It has also been identified that there would be a temporary increase in traffic noise during the 12-to-18-month period that Alexandra Avenue is closed along roads where traffic is diverted. As detailed in the EIS, the *Sydney Metro Construction Noise and Vibration Standard* should be implemented to manage these potential impacts.

It is understood the proposal is subject to further design development based on the outcomes of community and stakeholder engagement as well as environmental investigations.

7.1 Matters for Consideration

Council recommends that further investigation into noise mitigation measures be undertaken during the next stages of the proposal when detailed construction planning becomes available. This should be consistent with the *Interim Construction Noise Guideline* and specific mitigation measures should be developed and identified based on the exact equipment to be used, the construction methodology, and the specific activities, including duration of activities and locations. This will allow for the minimisation of sleep disturbance impacts.

In relation to ongoing operational noise and vibration from the sites, it is recommended that site specific acoustic assessments are carried out at the design phase to determine impacts on sensitive receivers, and that this is assessed against the *Noise Policy for Industry* (NPFII), relevant vibration guidelines as well as relevant Road and Rail Noise Policies/Guidelines and that there is oversight of this process by the NSW EPA. Additionally, ongoing acoustic and vibration monitoring results should be made available on request through a publicly accessible website.

7.2 Recommendations

Council recommends that alternative accommodation should be offered as an option to the worst affected residential receivers subjected to lengthy periods of high noise or vibration impacts, especially to those where sleep disturbance is likely.

Additionally, Council recommends that respite periods be offered, which considers the times identified by the community for when they are less sensitive to noise. Oversight of the process will be required by an independent body such as the NSW EPA and not just the Principal Contractor.

Consideration should be made to ensure intensive work periods are undertaken at times that would least impact on local schools. Council also recommends consultation with the Department of Education is undertaken and that the Department is kept informed and up to date and forewarned on any unforeseen impacts that may or are likely to arise. The Department should also be provided with direct contact numbers to be able to contact a responsible person should the educational facility be impacted.

Council recommends that extensive community consultation is continued to be undertaken throughout the ongoing stages of the project to ensure all impacted residents are kept informed. It is understood there will be a Sydney Metro Construction Complaints Management System in place including a 24/7 phoneline available for local residents. It is recommended that the phoneline details are displayed onsite as well as provided during this consultation period to both the affected residents and Council in the event complaints, concerns or enquiries are received by Council, relating to the project.

8. Contamination

The EIS has identified that the likelihood of contamination during the construction and fit out activities as addressed by this report will be low to moderate risk.

It is advised that the likelihood of any future contamination would be low risk as there are no significant amounts of chemicals of concerns or materials required for the ongoing upkeep and operation of the metro site.

8.1 Matters for Consideration

Due to parts of the Cumberland and Parramatta local government areas being subject to historical uncontrolled filling of chrome waste and asbestos by the former operations of James Hardie Industries, there is potential for unknown contamination in the fill and groundwater.

Any new information which comes to light during site preparation, remediation, demolition, or constructions works which has the potential to alter previous conclusions about site suitability and contamination should be reviewed and assessed through an unexpected finds protocol.

There will need to be ongoing groundwater dewatering for the station box throughout the construction and fit out phase. While the groundwater is considered to be low risk and localised, it will need to be monitored in accordance with an approved Environmental Management Plan and collected, treated and discharged at a licensed wastewater treatment plant.

During construction, there may be chemicals and materials required as part of the construction phase. However, these will be managed in accordance with construction environmental management plans.

8.2 Recommendations

It is recommended that Council's engineering teams are consulted where groundwater is required to go to Council's drainage system to ensure the capacity is sufficient. Also, Water NSW should be consulted for any impacts of dewatering on natural groundwater.

It is strongly suggested that oversight of the entire demolition and construction process including initial contamination review phases is undertaken by an NSW accredited site auditor to ensure the contamination aspects are thoroughly reviewed and assessed throughout the project.

The Westmead metro station construction site and its surrounds currently comprise a mechanical workshop on the corner of Hassall Street. It would need to be ensured that there is appropriate decommissioning of the primary sources of potential contamination and removal and remediation of any soils impacted by any contaminants of potential concern in the immediate vicinity of any Underground Petroleum Storage Systems (UPSS) and associated infrastructure.

Decommissioning and any removal of UPSS are to be supervised by a 'Duly Qualified Person' as defined by the *Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2019* ('Regulations') in accordance with the legislation and any relevant EPA Guidelines, standards, plans and policies. If a storage system is decommissioned/removed, the person responsible must ensure that a report for the storage site (prepared in accordance with the Regulations) is submitted, and in the case that remedial works are required, a Validation Report should also be submitted within 60 days of the completion of the decommissioning/remediation works. Any documentation relating to the decommissioning must be kept for 7 years.

9. Erosion And Sediment Control

During the construction and demolition phases, there is potential for soil, dust and water runoff impacts including during excavation works in rainy/windy weather.

9.1 Matters for Consideration

While it is noted in the EIS that this would be proposed to be managed with the implementation of standard erosion and sediment controls, it is recommended that site-specific sediment and erosion control plans are developed and implemented.

9.2 Recommendations

All required sediment and erosion control measures at the site shall be installed and maintained in accordance with the site's soil and water management plans for the duration of any demolition, excavation and construction works and in a way that minimises and prevents impacts on waterways.

10. Air Quality

It is identified that the main air quality concern will include dust impacts during construction works of the Westmead Metro Station. There are a number of nearby sensitive receivers including residential premises, users of public parks as well as educational facilities and places of public worship. It is expected that these receivers would be exposed to high dust impacts.

10.1 Matters for Consideration

A number of air quality mitigation measures have been identified in Appendix B of the Construction Environmental Management Framework document and it will need to be ensured these measures are implemented throughout the demolition and construction process. Additionally, as detailed in this document, the Principal Contractor is to prepare an

issue-specific environmental sub plan to address air quality management and relevant environmental impacts at particular sites and stages of the project.

In terms of air quality impacts from operational use, the proposal would be powered by electricity and local emissions generated during operation are expected to be minimal and highly dispersed. Air from stations and tunnels would be vented from the tunnel entrances and through the ventilation outlets incorporated into the stations and at the services facility, and the air being discharged would contain minor quantities of particulate matter and is expected to be dispersed quickly to the ambient environment resulting in a negligible impact to air quality.

Overall, the potential air quality impacts would present a low level of risk and would be manageable with the implementation of appropriate mitigation measures as detailed in the Construction Environmental Management Framework document.

10.2 Recommendations

Air quality impacts are mitigated as detailed in the Construction Environmental Management Framework document.

11. Business Impacts

The construction and operation of Sydney Metro West provide opportunities and impacts for businesses in the Westmead and broader Cumberland area,

11.1 Matters for consideration

Extension of the proposed business impact assessment area

Westmead South consists of a complex ecosystem of small businesses such as home-based businesses, childcare centres, construction material suppliers, beauty and wellness centres that are operating from residential premises, particularly along Hawkesbury Road and its side streets, which would be significantly impacted by construction vehicles and changes to traffic flow. Council, therefore, recommends the extension of the proposed business impact assessment area from 400m around the site to include the Westmead South area, which is bounded by Alexandra Avenue to the north, Parramatta Park to the east, Bridge Road to the west, and Great Western Highway to the south.

Demand for mixed-use development in Westmead South

Council is receiving feedback that there is strong demand for retail and commercial space in Westmead South due to its central location in Greater Sydney, lower rents compared to the north, and its proximity to the health and innovation district, and this is expected to increase with the transformation of the Westmead precinct and the construction and operation of Sydney Metro West.

Council supports the provision of mixed-use development on the metro site, particularly as development on this site is expected to catalyse development in the Westmead South precinct.

Further, to support the revitalisation of the Oakes Centre located on 70-78 Hawkesbury Road, improving pedestrian amenity and safety will be important. A minimum footpath width of 3m is recommended along the eastern part of Hawkesbury Road (near Alexandra Avenue).

11.2 Recommendations

Business impacts are mitigated by Sydney Metro and opportunities for Council to work with State agencies to support local businesses is pursued as part of the project.

12. Flooding And Stormwater

Flooding and stormwater considerations are identified as part of the project.

12.1 Matters for consideration

As most of the areas within Cumberland City Council are either lower than the flood planning levels or affected by PMF events, all critical infrastructure should be protected from PMF events. Further, all site stormwater discharge should comply with ANZECC guidelines, both during and post construction.

12.2 Recommendations

Flooding and stormwater impacts are mitigated in accordance with information provided in the EIS and relevant guidelines and requirements.

13. Biodiversity

Biodiversity considerations are identified as part of the project,

13.1 Matters for consideration

Although there is no expected direct biodiversity loss within the Cumberland City Council local government area due to the proposed works, this project could have the potential to provide biodiversity linkages between Westmead and Parramatta Park. Local plant species should be used in/around the transport hub (where possible) to increase biodiversity. Proposed green infrastructure could also contain habitat for species.

13.2 Recommendations

Biodiversity impacts are mitigated in accordance with information provided in the EIS and relevant guidelines and requirements.