

Submission to the Department of Planning, Industry and Environment

In response to the exhibition of the Sydney Metro West
Environmental Impact Statement

Resolved by City of Parramatta Council on 13 July 2020

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Attachment 1: Submission to Sydney Metro: In response to strategic station options for Sydney Metro – Rydalmere

1. Introduction

Council thanks the NSW Department of Planning, Industry and Environment (DPIE) for the opportunity to provide a submission to this public exhibition of the Environmental Impact Statement for Sydney Metro West. Council looks forward to continuing to work closely and proactively with DPIE and Sydney Metro through the consideration of the State Significant Infrastructure application and the development of the project.

Council strongly supports the delivery of the Sydney Metro West, as it is an important part of the city-shaping infrastructure required to support the anticipated growth across the LGA to grow a stronger and more competitive Greater Parramatta. On 16 June 2020, Council called for acceleration of the planning for the Sydney Metro West project as part of a package of ready-to-go projects that will help stimulate Sydney's economic recovery from the COVID-19 crisis and create more jobs.

Council notes that the planning approvals and Environmental Impact Assessment for Sydney Metro West are being considered in several stages, and this EIS is only for Sydney Metro as a concept and stage 1, which includes all major civil construction works between Westmead and The Bays, such as tunnelling and station excavation.

Council understands the utility of segmenting the approvals for such a large project, but points out that many of the impacts and mitigations which Council will be concerned with will only be apparent at later stages, including design and impact of stations and ancillary facilities. Accordingly, Council is concerned that decisions based on this EIS may have unintended impacts which cannot be identified and weighed without a view of later stages. Council will try to limit its responses in this EIS to the project's concept and first stage, however notes that it must take a broad and long view of impacts of the project.

Considering the segmented approvals process and the need for a speedy delivery of the project, Council calls on Sydney Metro to collaborate with local councils and other key stakeholders along the line to plan for the stations, interchanges and precincts that will support our current and future residents, workers and visitors to achieve a sustainable, liveable and productive city. Council feels that the State Significant Infrastructure approval process can help establish a framework for this collaboration (through conditions).

Council calls on DPIE to consider the following key subjects as part of the approval process for the Sydney Metro West Project:

- Inclusion (or as a minimum, provision for future addition) of a Metro Station at Camellia
- Investigation of alternate locations for the storage and maintenance facility at Clyde, or as a minimum, replacement for the loss of recreational space
- Identification and planning to ensure seamless connections to future rail links, Parramatta Light Rail Stage 2 and new feeder bus services
- Integrating land use, pedestrian, cyclist and public transport connections at Westmead and Sydney Olympic Park
- Integrating land uses, the Civic Link, the over-station development, pedestrian, cyclist and road and public transport connectivity at Parramatta; and
- Mitigating recreation, environmental and flooding issues at Clyde/Rosehill and delivering the planned regional scale walking and cycling link along the former Carlingford Line (T6).

Regarding the draft amendments to the State Environmental Planning Policy (Infrastructure) 2007, which were exhibited concurrently by DPIE with the Metro West EIS, Council understands the value of protecting the Sydney Metro West rail corridor from encroaching development, however, Council suggests that DPIE reconsider the thresholds for notification for concurrence, to ensure low-impact Development Applications—which are unlikely to affect Metro West—are not unnecessarily delayed.

2. Strategic Needs and Justification

The City of Parramatta acknowledges the strategic need and justification for the project. Council looks forward to completion of the Sydney Metro West project—indeed we call for it to be expedited—which will bring greater transport connectivity and economic benefits. Council maintains that the specific benefits of improved transport connectivity combine and reinforce each other to create a city shaping benefit, which will support Parramatta’s metropolitan role as the Central City of Greater Sydney.

The City of Parramatta Council recently prepared a Local Strategic Planning Statement (LSPS) in response to revisions to the Environmental Planning and Assessment Act 1979 (EP&A Act). The City’s LSPS sets out the 20-year vision for land use planning in the Parramatta local government area (LGA) and responds to broader priorities identified in the District Plans – in the City of Parramatta’s case, the Central City District Plan (March 2018) (or “District Plan”). The City’s new LSPS was endorsed by Council on 23 March 2020 and then came into effect on 31 March 2020 following receipt of a letter of Assurance from the Greater Sydney Commission.

The Parramatta Local Strategic Planning Framework City Plan 2036 draws together the needs and aspirations of the community and identifies priorities for jobs, dwellings and infrastructure. As part of determining the housing vision within the LSPS, Council prepared a Local Housing Strategy (LHS) relying on State Government guidelines for preparing local housing strategies. The LHS provides strategic direction on where and when future housing growth will occur within the City of Parramatta. It also aligns with the housing requirements in the State Government’s District Plan (including targets). Council also prepared the Draft Employment Lands Strategy Review and Update (August 2019) (ELS Review and Update) which updates the status of employment land precincts across the City outlined in the Parramatta Employment Lands Strategy (2016). Together, they make up the vision for employment lands across the City.

The LHS and ELS Review and Update will be reported to Council on 13 July 2020, where Council will consider a resolution to forward these to the Department of Planning, Industry and Environment (DPIE) (consistent with the requirements of relevant section 9.1 Ministerial directions) for their review and approval.

During the consultation phase of the LSPS, LHS and (ELS Review and Update), one of the strong messages Council heard from the community was the need for infrastructure provision to support the substantial anticipated growth – almost doubling of the population from 235,000 in 2016 to 433,000 by 2036. This equals an additional 87,900 dwellings with a further 20,020 dwellings already being planned for in growth precincts beyond 2036. In the City’s key employment centres - Parramatta CBD and Westmead – it is expected that these centres will accommodate 60% of the total forecast job growth across the City of 164,000 in 2016 to 250,000 by 2036.

Delivering the public transport infrastructure commensurate with this substantial growth is a key challenge and Council supports the NSW State Government’s proposal for the Sydney Metro West as part of the city-shaping infrastructure required in the future to service the Greater Parramatta area.

A metro service between Sydney CBD and Westmead with stations at SOPA and Parramatta CBD will enable Council to deliver on the priorities and actions in its LSPS including:

- Expanding Parramatta’s economic role as the Central City of Greater Sydney (Planning Priority 1) to support job growth in key employment centres to reinforce Greater Parramatta’s role as the Central City (Council Policy Direction 1) by advocating for the delivery of an integrated transport network that enables growth of employment centres, and connects the district to metropolitan Sydney, to support jobs growth (Action 1).
- Advocating for improved public transport connectivity to Parramatta CBD from the surrounding district (Planning Priority 3) by supporting the planning for the Sydney Metro West (Council Policy Direction 6) by collaborating with the State Government to prioritise the delivery of the Sydney Metro West project and Parramatta Light Rail Stage 1 (Action 12) and collaborating with Transport for NSW and DPIE on

the planning and delivery of future Sydney Metro West stations proposed at Westmead, Sydney Olympic Park and Parramatta CBD and their surrounding areas, to ensure existing and proposed built form, public domain, transport networks (including heavy rail, light rail, bus and ferry), civic infrastructure and land uses are strongly integrated (Action 14).

- Improving active walking and cycling infrastructure and access to public and shared transport (Planning Priority 10) by advocating for bringing-forward the Sydney Metro West delivery, as well as other city-shaping transport (Parramatta to Epping, Parramatta to Western Sydney Airport, Parramatta to Norwest, Parramatta to Kogarah via Bankstown and Parramatta Light Rail Stage 2) and with improved walking and cycling access and public spaces to those services (Council Policy Direction 35).

Council feels that connectivity with other city shaping services and infrastructure projects is critically important to realising the full benefits of this project. Coordination with future metro lines and planned and existing light rail and bus services will multiply transport benefits for all users. It is critical that future connections are planned for now—rather than retrofitted once precincts are built.

In its 2018 submission to Transport for NSW for Future Transport 2056, the State's Strategic Transport Plan, Council voiced strong support for future rail lines, in addition to Metro West converging in Parramatta. These include train links from Parramatta north to Epping and Norwest, west to the new Nancy Bird Walton Airport in Western Sydney, and south to Kogarah via Bankstown. Council feels that these rail connections are critical for the development of the Central City. In 2018, Council called for the accelerated development of these train connections through Parramatta. To ensure that Metro West enjoys efficient and easy connections to these new lines, it is imperative that that Sydney Metro and Transport for NSW work with local governments to identify the basic attributes, including location, direction and transfer facilities, for this infrastructure and ensure that the Metro West Project contains all necessary connections and allowances to support the planned infrastructure.

The Metro West Project delivers greater capacity and speed between Parramatta and Sydney CBD. The project, as described in the EIS, has only two stops in the City of Parramatta, and features long distances between stops on its western end. Unlike the Northwest Metro, which was just finished, last year, it has no commuter car parks. Without the right planning for public transport connections, the project will be of limited use for many of our residents. The project should be planned in conjunction with Parramatta Light Rail Stage 2, and the project should work with Transport for NSW, and local councils to make bus access plans for properly coordinated feeder routes for each station.

Regarding hours of operation (Sec 6.4.1), Council supports the maximisation of service hours to support patronage and workers in the night-time economy.

Recommendation

- The project should work with Councils and TfNSW to establish a view of future rail connections interfacing with the line, particularly in Westmead and Parramatta, and consider how connections will be made to for future lines such as the Western extension to the Nancy Bird Walton Airport and rail lines from Parramatta to Kogarah, Norwest and Epping.
- The project should work with Transport for NSW and Councils to ensure that the design of station areas and access plans are coordinated with planning for Stage 2 of Parramatta Light Rail.
- The project should work with Transport for NSW and Councils on Public Transport access plans to plan and coordinate light rail and bus feeder services.

3. Sydney Metro West development and alternatives

Council avidly supports the rationale and broad vision for Sydney Metro West. Council looks forward to construction and opening of the project and acknowledges its benefits, including relieving capacity issues on the T-1 Western Rail Line and achieving a faster connection between Parramatta and Sydney CBDs. Two stations, Parramatta CBD, and Sydney Olympic Park are planned in our local government area, and a third, Westmead, is adjacent to Council's boundary.

These stations will bring faster, and more convenient, public transport services to residents, workers and visitors in our local area. However, it should be noted that all three of these stations are close to existing rail stations. The benefits of metro rail service can be spread more evenly, and more efficiently, if a new station is built between existing heavy rail stations. Council feels that a significant city-shaping opportunity is being missed if an additional station is not built along the long stretch of track between Parramatta and Sydney Olympic Park.

Rydalmere and Camellia

Council notes that a Metro station within the suburb of Rydalmere was being considered as a potential additional station between Sydney Olympic Park and the Parramatta CBD but understands that this option is no longer part of the Sydney Metro West project. The result being there is no station between Sydney Olympic Park and the Parramatta CBD, which is by far longest section of the route without a stop. It is acknowledged that one of the key elements underpinning the Metro West project is the ability to travel between Parramatta CBD and Sydney CBD within 30 minutes. Council's position is that an additional metro station should not prevent this objective from being achieved, particularly given a station in Rydalmere was under consideration up to the point of the EIS being released for public consultation.

In its submission (please see **Attachment 1**) to Sydney Metro on Strategic Station Locations, resolved 16 December 2019 Council supported a station in Rydalmere but noted its preferred location for a Metro station was at Camellia to support the future development within the proposed Camellia Town Centre of 3,500 dwellings by 2036 and to provide convenient access for events at Rosehill Gardens. The 'Structure Plan' in the City's LSPS identifies Council's preference for a metro station at Camellia, which also provides an additional opportunity for a transport interchange with the Parramatta Light Rail.

Council supports the inclusion of a station at Camellia for the following reasons:

- To provide much needed regional access to important recreational and commercial uses currently in the precinct, and to catalyse the transformation of the Camellia precinct, which is being planned for up to 10,000 residential units and to provide over 5,000 jobs.
- City shaping benefits – to provide a well-connected suburb to the Parramatta CBD to reinforce the vision of a metropolitan-scaled Central City laid out in the Metropolis of Three Cities and the Central City District Plan.
- Transport benefits – including network benefits from providing an additional location for customers to catch trains, a much improved connection for users of Parramatta Light Rail on the Carlingford Line, and distributed interchange (reducing the need to interchange at Parramatta)

Council supports the goal of a fast connection between the Parramatta and Sydney CBD's. However, it is not evident that locating an intermediate station between Parramatta and Sydney Olympic Park will significantly reduce these travel times. Considering the close station spacing further down the line (four stations in about 7km) it is not likely that trains will be travelling at maximum speed through Camellia, lest they should overtake trains further down the line.

Council does not agree with the analysis provided in Part A of Chapter 3 which is cited as the rationale for the decision in Camellia. Council does not agree that Camellia should score poorly in 'Strategic alignment' as Camellia is the subject of a State-led master planning process. Council does not agree that Camellia should score poorly for 'Productivity & jobs,' 'Housing supply' and 'Urban renewal and placemaking'. There

are no definitions of criteria, nor indication of how they were scored, nor explanation of how the various criteria were weighted against each other. Council contrasts the analysis for Camellia to that of the Five Dock station area which the EIS indicates was proposed for inclusion because it is on an “efficient” alignment, yet there are no significant plans for density.

Station location option	Evaluation criteria						
	Customer benefits	Strategic land use and transport alignment	Productivity & jobs	Housing supply	Urban renewal & placemaking	Transport integration	Deliverability & value for money
Rydalmere	●	●	●	●	●	●	●
Camellia	●	●	●	●	●	●	●
Rosehill	●	●	●	●	●	●	●
Silverwater East	●	●	●	●	●	●	●
Silverwater West	●	●	●	●	●	●	●

Figure 1: Extract from Sydney Metro EIS (Table 3-8: Performance of station options between Parramatta and Sydney Olympic Park against the network objectives)

Council recommends Camellia is included, or the proposed station in Rydalmere is retained to ensure provision for an additional metro station is part of the EIS. If a station in Camellia is not considered appropriate when the project opens, it should be allowed for, and partially constructed as necessary, to be completed and opened when significant growth in the precinct comes online. If a station, or allowance for a station, cannot be provided in Camellia or Rydalmere, we ask Sydney Metro to work with Council to explore other possible locations for stations including in Silverwater and Clyde.

During the exhibition period for this EIS, Council's Lord Mayor wrote the Minister for Planning and Public Space and the Minister for Transport to call on the State Government to continue the master planning process for Camellia and to include a metro station in the planned town centre.

Recommendation

- The Project should work with Council, the City of Parramatta community, and the relevant State agencies, in an open and transparent process to evaluate the need for and possible location of a station for Sydney Metro in Camellia, and alternative options including future-proofing a station in the precinct or building a station in an alternate location between Parramatta and Sydney Olympic Park.

In accordance with a resolution moved by Council on 28 October 2019, Council wrote to the Premier and her Ministers to advise Council's complete support for Valvoline Raceway (Speedway), Parramatta to remain in its historic and present location due to the land being recreational land. Council also requested that given the long association of the Speedway with the site (since 1977) that the State Government strongly consider alternative locations for the stabling yards and other Metro project requirements. (Council also addressed this in the attached submission to Metro regarding Rydalmere and Camellia.)

The proposed location for the facility would reduce the amount of private recreation land considerably in the Parramatta LGA. The proposed location, at the confluence of A'becketts Creek and Duck Creek is highly flood affected, will negatively impact the Central City's cultural, environmental and recreational assets, most notably the two waterways, creeks, the speedway and racecourse.

Recommendation

- The project should consider relocation of the maintenance and stabling facility currently planned for Clyde to a position which is less impacted by flood waters and has fewer social, environmental and recreational impacts.

4. Placemaking

The City of Parramatta considers placemaking and design as critical issues to the success of this project. Council seeks to ensure that stations fit properly into the surrounding urban fabric in Westmead, Parramatta and Sydney Olympic Park. Stations should be integrated, and where possible, should enhance, surrounding pedestrian, cyclist and transport networks. They should ensure easy, accessible interchange for all users. The maintenance, storage, ancillary facilities, track work and structures in Camellia, Rosehill, Clyde and Silverwater should contribute to the industrial and recreational land uses in each precinct, as well as minimise and mitigate impacts to open spaces and recreational uses.

The project has provided some detail and high-level principles for placemaking in station precinct areas. However, given that this is a staged approval for only a concept and major civil works, there are very few details to consider or comment on regarding these efforts. Accordingly, Council feels insufficient detail has been provided on the intended outcomes for station locations or public domain structure of blocks to provide detailed feedback on the Concept Design and Stage 1.

It is very unclear as to what it meant by the “focal points” shown on each of the precinct concept maps. The intent, approach, and expected outcomes of “supporting greater activation” requires further explanation. At a minimum, this should include active street frontages, opportunities for business development, permanent and temporary public art and events and cohesive lighting design to support 24/7 activation of spaces.

Council will seek to work on these issues through Sydney Metro’s consultation on the design of the project, and understands that later stages will go through their own exhibition and approval process.

A stronger commitment to public art should be made and Public art should be considered with Council in accordance with the City’s Public Art Policy and Heritage Interpretation principles to facilitate meaningful public art outcomes particular and connected to place and with community support. Further, there should be a more firm commitment to robust heritage interpretation principles being developed, and a commitment to integration of heritage interpretation into all station developments and precincts

Parramatta CBD

The significance of the Parramatta CBD has been recognised in the State Government’s strategic planning framework for a number of decades. Its current recognition at the heart of the ‘Central City’ in the Greater Sydney Region Plan - A Metropolis of three cities and the Central City District Plan continue to strengthen the significant economic function of the Parramatta CBD and its role in providing necessary housing, employment, recreation and cultural opportunities. The City of Parramatta supports the inclusion of a metro station within the Parramatta CBD as it is the critical infrastructure required to support the current and anticipated growth of the Parramatta CBD.

Parramatta CBD Planning Proposal

To manage the significant growth and changes in the CBD, Council has prepared a Planning Proposal to amend the planning controls for the Parramatta CBD contained in Parramatta Local Environmental Plan 2011 (PLEP 2011). The Planning Proposal broadly seeks changes to the Parramatta CBD boundary, land use mix, primary built form controls, and the mechanisms for infrastructure delivery to deliver over 50,000 new jobs and 14,000 dwellings. This is to achieve the City of Parramatta Council’s vision for the growth of the Parramatta CBD as Australia’s next great city.

Critical to the achievement of this vision is aligning the anticipated growth with infrastructure provision, and this includes a metro rail line. In 2016 Council commissioned a ‘Strategic Transport Study’ as the first stage of work required to inform the ‘Parramatta CBD Integrated Transport Plan’. The Strategic Transport Study identified current and future traffic and transport demands on the network, and the capacity constraints for rail, buses and ferries and at interchanges such as Parramatta Interchange for both trains and buses. Based on these challenges, the study suggested the need for a second Parramatta CBD train station by 2056 and encouraged planning work be undertaken to identify an appropriate location.

The importance of transport infrastructure to deliver connected and productive places is consistent with the Greater Sydney Region Plan under Objective 19 and in the Central City District Plan under Planning Priority

C7 which acknowledges the need for changes to the planning framework to stimulate employment and dwelling growth for the Parramatta CBD to fully realise its potential. The introduction of Sydney Metro West with a critical second railway station for the Parramatta CBD will improve east-west connectivity and will contribute to Parramatta CBD being Sydney's Central City and Australia's next great city.

Site-specific Planning Proposals within the Parramatta CBD

City of Parramatta Council is actively managing 34 site-specific Planning Proposals (SSPPs) within the Parramatta CBD, and it is noted that none of these overlap with the proposed Parramatta CBD metro station construction site within the Horwood Place block. However, the tunnel at a depth of approximately 25 metres would likely go very near or under some SSPP sites, and the implications of this would have to be dealt with through the development application processes for those sites/construction of the Metro. This is also the case for many potential development sites within the Parramatta CBD sitting above the tunnel. Development along the alignment route, both above and below ground, is also relevant to the other station locations and along the alignment route and is addressed as part of Council's comments below on the Infrastructure SEPP.

The recently finalised site-specific Planning Proposal (LEP 2011 amendment) at 220-230 Church and 48 Macquarie known as the Greenway site intersects with the Parramatta CBD metro station construction site. The exhibition documentation acknowledges this, and Council notes that this would prevent the approved redevelopment at this site from going ahead.

Horwood Place Metro Station

Council supports location of a Metro Station at the Horwood Place block as a second station, separate from the Parramatta Train Station. This is consistent with Council's strategic work at and near the site such as Civic Link - a north-south pedestrian spine between the heavy rail station and Parramatta River; and Parramatta Square – an east-west pedestrian space intersection with the Civic Link. The sensitive integration of the proposed station with the surrounding precinct and urban street network is critical being located at the junction of a proposed highly pedestrianised area that will serve various needs and functions including passive recreation and transport interchange (walking and cycling, light/heavy rail, bus and private vehicle).

Similarly, the integration of any future development over the station needs to be consistent with the draft planning controls in the Parramatta CBD Planning Proposal. At the present time, Council is awaiting a response from DPIE to proceed to public exhibition following public authority pre-exhibition consultation and amendments to the Planning Proposal consistent with the Gateway Determination. Particular attention must include: the solar access requirements for Parramatta Square and Lancer Barracks site (clause 7.4); built form provisions – floor space and height (clauses 4.3, 7.2 and 7.6); street level active frontage requirements (clause 7.6F); provisions for managing heritage impacts (clause 7.6K); and provisions for managing floodplain risk (clause 7.6L).

Specific comments related to placemaking in this precinct:

- The place diagram is overly simplistic and requires further consideration and alignment with the Civic Link Framework Plan and draft Civic Link DCP. The Concept does not adequately describe how the station will integrate within the block. The alignment of new connections east west (between Church and Smith Streets) and north-south (between Macquarie and George Streets) requires further development to ensure:
 - Alignment of the new north-south street (indicated through 41-59 George Street) supports access requirements, viable development outcomes and provides an appropriate future setting for the heritage building. Introducing a new street along the western edge of the heritage building emphasises its side elevation, and thus degrades its historical setting. It also results in odd residual land parcels, which may be unlikely to amalgamate with adjacent properties. A poor built form and public domain outcome is likely.
 - The kinked street alignment (indicated within the precinct diagram) is straightened. This arrangement is not typical of the Parramatta street and block pattern and not desirable. Straight alignments of streets and lanes are preferred.
 - There is an opportunity for Metro to undertake further refinements to the DCP connection alignments, particularly the east-west connection, which are currently working around land ownership constraints. Any changes to the block structure to the draft Civic Link DCP must be undertaken with an integrated approach to pedestrian, cycle and vehicular access/movement, public domain and built form outcomes and be undertaken in consultation with CoPC.

- A single entry point onto the Civic Link to the Metro is inadequate for the size and significance of interchange, which will occur at this station. Additional entry points should be provided to address crowding and which facilitate easy, legible interchange for pedestrians and provide enhanced connection to Parramatta Train Station (at Parramatta Square), buses on Smith Street or Parramatta Light Rail. An entry on Church Street could facilitate precinct interchange between modes and increase choice in the network. Pedestrian modelling should be conducted to demonstrate the capacity of any proposed public domain to handle the volume of movement.
- Response to Aboriginal cultural design (7.5), Non Aboriginal Heritage (7.6) and Public Art (7.7) should be in keeping with the draft Civic Link DCP and the draft Parramatta CBD Public Art and Heritage Interpretation Strategy including future Civic Link Art and Interpretation Plans.

Recommendations

Given the complex and overlapping strategic proposals within the Parramatta CBD it is critical that Council is consulted early, and before the lodgement of the Stage 2 SSDA, to enable the relevant Council officers the opportunity to ensure the station design is permeable and links appropriately with the surrounding area. Council welcomes the opportunity to collaborate with the NSW Government to deliver a seamless and intuitive design that is consistent with the proposed controls in the Parramatta CBD Planning Proposal and other strategic work for this part of the CBD.

- Amend preliminary place and design principles to include:
 - Provision for diverse movement network in the block that includes streets, laneways and pedestrian links equal to (or as a further enhancement of) the draft Civic Link DCP. Connectivity is alluded to in the simplistic place diagram but written principles only address pedestrian permeability. General, emergency and service vehicles will need access to properties within the block.
 - Integration of substations, ventilation stacks, services into development to promote public use and activity within the public realm and along building edges.
- Confirm that station excavation and civil design will enable the Civic Link vision to be achieved across the excavation footprint to support significant tree planting and required soil depths, stormwater storage and management within the public domain including WSUD initiatives and shared utilities corridor fit for future development as per the Civic Link Framework Plan.
- Coordinate utilities corridor and deep soil planting zones with the City of Parramatta to ensure continuous outcomes are achieved beyond the Horwood Place Block.
- Coordinate with Council regarding any proposed activation initiatives and provide opportunities for temporary public art on any construction hoardings.

Westmead

The City of Parramatta supports the inclusion of a metro station in Westmead as it is critical infrastructure required to support current and future growth of the Westmead Health and Education precinct. Council acknowledges that the station location is just outside its local government boundary; however, Council has a strong interest in the location and the design of the station given its important role in the precinct.

The draft Westmead Master Plan seeks to leverage the health and education infrastructure already in Westmead and transform the precinct into a globally competitive innovation district by 2036. The EIS states that the concept can support increased housing supply in the Westmead 'urban renewal' area through transport-orientated development. Council recognises that the draft Westmead Master Plan will likely facilitate some residential intensification (up to 4500 dwellings by 2036); however, the primary focus is facilitating the intensification of health and education land uses and the associated employment generation. In 2016, there were almost 18,000 jobs in the Precinct, and the draft Master Plan anticipates this is expected to grow to 51,000 by 2036 and 65,000 by 2056. Any land-use change in Westmead must be consistent with the objectives of the innovation precinct and should be supported via a coordinated approach with key stakeholders within Westmead.

It is therefore essential that a stronger emphasis be given in the EIS to Westmead as a Health and Education Precinct. The Westmead metro station, together with the Parramatta light rail and existing rail station, is critical in supporting the land use vision for the Westmead Precinct.

It is also essential that planning for the station emphasises connectivity between the metro station, existing

rail station and light rail, to facilitate seamless and accessible interchange; and the design and supporting infrastructure for the metro station should contribute generally to the connectivity of the precinct, particularly for users moving north-south across the Western Rail Line, and east-west, across Hawkesbury Road.

Council notes that the Westmead Metro Station site will be under construction from the third quarter of 2021 to the first quarter of 2026 – longer than any other station along the proposed line.

The EIS states that the block bound by Hawkesbury Road, Alexandra Avenue and Bailey and Hassall Streets will be acquired to facilitate the construction and delivery of the future Westmead Metro Station. The future of any surplus land post-construction should be considered in the context of the Westmead Precinct and not just be identified for residential development.

Specific comments related to placemaking in this precinct:

- The place diagram is overly simplistic and requires further development to reinforce both State and Local governments' vision to create a Global health and education precinct at Westmead and support its successful delivery with an integrated and connected transport hub.
- A multi-modal interchange is needed that integrates not only the existing train station but also pedestrians, cyclists, buses and light rail to create a transport precinct that provides safe, equitable and legible access for all users. Prioritising pedestrians and cyclists is not only fundamental to facilitate the growth of the precinct but to support a healthier and more resilient urban environment, an exemplar for a world-class health precinct.
- A single station entry to Hawkesbury Road limits opportunities to create an integrated interchange between transport modes and transform Westmead by connecting north and south areas on either side of the existing railway line.
- Creating a permeable and high amenity pedestrian environment with multiple linkages bridging the rail line is necessary to improve pedestrian mobility within the precinct and to maximise the transit catchment.
- Precinct plans must prioritise pedestrian movement between the transport hub and existing neighbourhood centres at Church Ave to the south, at Railway Parade and Queens Road to the north, to support economic development and revitalisation of surrounding centres.
- The principle to activate Hawkesbury Road requires detailed investigation with respect to traffic movement and design response in order to prioritise pedestrian movement and achieve the ambition of a unifying north south spine.
- Upgrade of the existing bridge carrying Hawkesbury Road over the railway line should be included in the scope of the project to unlock existing infrastructure constraints, achieve the ambition to activate Hawkesbury Road, and could support vertical access between transport modes. The bridge upgrade should be designed to accommodate future light rail extension south of the heavy rail station.
- Upgrade of the existing heavy rail station should be included within the planning and design scope of the project to unlock the transformational opportunities of the project and provide a truly integrated transport hub for the global health precinct. Should this ambition be staged to deliver at a later date, a masterplan to achieve this aim should be undertaken as part of the metro project and as a minimum, an accessible path of travel from the heavy rail station to the light rail terminus provided (as an interim measure) as part of the metro project.
- Consideration should be given to moving the light rail terminus to better integrate with other transport modes and realise the opportunity of a truly integrated transport hub.
- Location of the T-Way bus interchange will be critical to integrate with other transport modes and realise the opportunity of a truly integrated transport hub
- The proposed Metro Station should respond to the draft Westmead Master Plan on both Parramatta and Cumberland LGA
- Principles and planning for the station precinct should seek opportunities to maximise fixed and temporary activation of the station precinct as a civic space, encourage day and night time activation, and support for the night-time economy in Westmead.

Recommendation

Given that the important role the station has in the Westmead Precinct and its role as a significant

interchange between Metro, the T1 heavy-rail line and light rail, it is important to consult with Council and City of Cumberland Council early (and before the lodgement of the Stage 2 SSDA,) to facilitate our input to ensure the station and precinct design contributes to the precinct's future development, it is permeable and it links Westmead North and Westmead South.

Sydney Olympic Park

The City of Parramatta Council supports the inclusion of a metro station at Sydney Olympic Park as it will become critical infrastructure required to transport patrons to major sporting and cultural events, while also supporting the growth of the precinct as it evolves into a vibrant town centre, lifestyle and commercial precinct. The station is also important to provide better public transport connectivity for surrounding precincts such as the Carter Street Precinct, Melrose Park and Wentworth Point, particularly if combined with PLR stage 2. The total expected growth in dwellings to 2036 for these three areas and Sydney Olympic Park is approximately 30,000, with Sydney Olympic Park also a rapidly growing employment centre.

It is therefore essential that the Sydney Olympic Park metro station integrates with the surrounding area to accommodate the high volume of passengers outside of times when major events are running. While the EIS acknowledges the need for placemaking, further detail is required to ensure the Sydney Metro Design Objectives referred to in Table 7.2 of the EIS can be adequately addressed.

The EIS acknowledges the role of the metro station as a transport interchange and Council agrees that this is a critical element. Council considers that sufficient provision must be made to allow smooth and convenient mode shift for the high volumes of passengers to Parramatta Light Rail Stage 2 and feeder bus routes.

- The project should seek opportunities to integrate the metro station with the existing heavy rail station serving Sydney Olympic Park. This could be more explicitly pursued through a reference in the place and design principles drafted for the precinct.
- Planning and design for this station should include consideration of interchange with stage 2 of the Parramatta Light Rail project.
- Serving major events and large crowds has been identified as a principle for design of the station. This is appropriate considering the calendar of large-scale events which operate out of Sydney Olympic Park. The City of Parramatta would support designs which cater for event mode, without significantly enlarging the scale of public spaces which then results in poor everyday activation to fill large void areas on non-event days. Prioritisation should be given with the metro development to ensuring that there are appropriately scaled community-focussed spaces in and around the metro station to support the growing high density town centre. This may require a flexible approach and the preparation and implementation of appropriate management plans as alternatives to large-scale hard infrastructure.
- Council supports the ongoing transformation of Sydney Olympic Park as a major entertainment and night time centre, and suggests night time operation and activation should be considered for design principles.

Recommendation

It is critical Council is consulted early, and before the lodgement of the Stage 2 SSDA, to enable the relevant officers the opportunity to provide detailed input into the station design to ensure it integrates appropriately with the development at Carter Street, Melrose Park and Wentworth Point.

Clyde Dive Structures, Stabling and Maintenance Facilities

Notwithstanding Council's position that it supports Valvoline Raceway (Speedway), Parramatta to remain in its historic and present location due to the land being recreational land and the long association of the Speedway with the site (since 1977) and that the State Government strongly consider alternative locations for the stabling yards and other Metro project requirements, the following section provides technical advice on the scheme within the EIS that proposes the Silverwater Services Facility and the Clyde Stabling and Maintenance Facility. It is understood that these facilities are not intended to facilitate public access or interaction. As these facilities will have a significant footprint within the Parramatta LGA, the City of Parramatta seeks assurances that their designs provide improve the amenity, safety and ecological function of the areas in which they are located.

Sydney Metro's principle for the facilities to improve the precincts in which they are located, including

through supporting the riparian corridor at Duck Creek and A'Becketts Creek in Clyde is supported.

The proposed Clyde stabling and maintenance facility will have one of the most visible and significant impacts on the future development, access and character of an area than any other proposed infrastructure site in the project. It is recommended that additional efforts be made to ensure that the principles of place-making are addressed in the design and development phases of the project.

Of particular importance given the scale and location adjacent scenic natural resources, is public connectivity.

The current site land-use is defined by a mix of small to medium scale industrial facilities alongside the raceway recreation site. Adjacent the site are a number of other major land uses such as the Clyde Heavy Rail stabling yards, Rosehill Racetrack recreation area, Camellia industrial precinct and the James Ruse Drive and M4 motorway corridors.

Connectivity is a significant challenge for the precinct with land-uses that require such large footprints. The impacts of this lack of access extends beyond the site area and affects the future potential of neighbouring industrial, commercial, residential and recreational land uses. Current poor connectivity is a challenge that needs to be addressed.

The design and development of the Clyde stabling facilities should aim to improve connectivity as well as provide a well-functioning facility. The design needs to respond not only to existing connections but also realise future options that arise through the development of the project.

In addition to connectivity issues, the removal of the Raceway (14.8.3 Impact assessment) represents the loss of a recreation facility for the local area. In an area which has very little open space. While the raceway is proposed to be relocated as part of the project, this will not benefit the local area.

It is recommended that greater offset be identified for the loss of recreational land locally. This could be delivered through a number of projects identified by the City of Parramatta. These projects could also have additional benefits for the stabling yards through the mitigation of flooding and the improvement of access to the facility.

- The place and design principles listed in sec 7.10.9 for the Clyde facility do not speak sufficiently to integration with and impacts to the surrounding land use and natural features. There are no place and design diagrams for the facilities proposed for Clyde (nor for the facility proposed in or for Silverwater).
- Additional information is required, including concerning the dive structures, all tracks in and the maintenance and stabling facility (including plans for the land north of the dive structure, along the Carlingford Rail Line, marked "Required for Future Stage" in EIS Figure 9-17) and the relationship of these elements to Rosehill Racecourse, Camellia, and James Ruse Drive, and future roads and walking and cycling links.
- Clyde is significantly Flood & High Hydraulic Hazard impacted. The location of the stabling and maintenance yards with a very large footprint in a high flood impact zone will lead to significant impacts from both an environmental and built form perspective.
- The Rosehill racecourse and the Camellia Peninsula continues to be severed from the city with the new southbound link to Clyde stabling facilities. The south bound link should be kept subgrade to prevent further isolation of the Camellia peninsula and future crossing points should be a priority. A subgrade design would enable the heavy rail corridor southbound to Clyde Station to be retained as a surface transport (future public transport and walking and cycling) corridor.
- If the southbound link cannot be moved completely sub-grade, it is recommended the dive structure is moved as far south as possible, preferably south of Unwin Street.
- Figure 9-17: Clyde stabling and maintenance facility indicative construction site layout, shows an extension of the construction area to the north, along the Carlingford Railway line toward Grand Avenue that is labelled "Required for Future Stage". If this land will be used by Metro for future operations, it is likely to further separate Camellia and Clyde from the CBD, and will further impact the planned walking and cycling link along the rail line.
- The Stage 1 scheme should engage with Sydney Water for the potential relocation of the Sewage Pumping Station that may be displaced if the Camellia Town Centre proceeds.

Recommendations for technical place and design principles and actions for the Clyde Stabling facilities

- Investigate opportunities to provide public walking and cycling access alongside the restoration of Duck Creek and A'Becketts Creek
- Investigate opportunities for delivery of publicly accessible connections on all sides of the facility.
- Maximise site permeability and public access wherever possible
- Work with local government and other stakeholders to identify changes to walking, cycling and street networks to benefit both local and regional connectivity
- Deliver the regional walking and cycling link along the former Carlingford Line (T6)
- Work with local government and other stakeholders to help offset recreational land lost locally.

5. Transport and Traffic

Sydney Metro West will bring significant benefits for the City of Parramatta, however Council has concerns on a number of transport and traffic issues regarding Concept and Stage 1 construction of the project that are detailed below.

Integration of public transport — an opportunity exists for connection to, and improvement of existing public transport services. Each proposed Metro station within the City of Parramatta LGA adjoins existing public transport interchanges. Each has their own challenges and this project should address these and leverage opportunities to provide a superior outcome.

Pedestrian permeability — a number of sites seem to unnecessarily limit permeability for pedestrians, both during construction and in operation. High pedestrian areas such as at Westmead and Parramatta should minimise restrictions to pedestrian movement during construction, and seek to augment existing connections during operation when foot traffic will increase markedly. The Maintenance and Stabling Facility is adjacent to the regional M4 walking and cycling path. Connections to this path should be delivered by the development of Stabling Facility for the benefit of the public and specifically access for future staff to encourage walking and cycling to work.

Cumulative impacts of construction — currently a number of large developments are underway at Westmead and Parramatta CBD with others yet to commence. The resultant “construction fatigue” impacts the whole community.

Precinct planning for the metro stations should include consideration of the cumulative impacts of Metro on local plans (such as the Westmead Masterplan, Parramatta CBD Planning Proposal, Civic Link DCP) and other transport projects including PLR (stages 1 and 2) and Smith Street bus corridor. This should inform consideration of the movement network for pedestrians, cyclists, and vehicles including public transport. At each station, the number and location of entry points should be guided by more detailed assessment of pedestrian movement patterns, spatial requirements, density and flows. Comments specific to each location are listed below.

Section - 6.7.1 Westmead metro station

- The key features list only one point of entry to the Westmead metro station. Concepts should be considered to provide for multiple entry points, to support a better place outcome and more permeable interchange, reflecting the significant barriers to pedestrian access that currently exist.
- Other than a hierarchy of users with pedestrians and cyclists at the top, there is no consideration of the proposed network and how cyclists might access and interchange at Parramatta and Westmead Station, in particular:
 - A cycle route aligned as close to Alexandra Avenue should be provided, potentially under Hawkesbury Road at the railway line to continue the regional cycle route along the Western Railway Line from Toongabbie to Westmead and Parramatta. This may also reduce pressure on the likely high volumes of pedestrians and cyclists seeking to cross Hawkesbury Road at Bailey Street and Railway Parade.
- PLR will act as a local feeder service for users in Westmead, the Parramatta North Urban Renewal Precinct and North Parramatta and therefore interchange with Metro and the existing heavy rail is critical. The Westmead Station should deliver a clear, accessible and attractive path to interchange with PLR. This path will also be important for creating an accessible pedestrian route from Metro to Westmead Hospital.
- Bus Infrastructure at Westmead - Hawkesbury Road and Alexandra Avenue at Westmead Station currently provides bus priority infrastructure along the Northwest T-Way. However, the indicative road layout at Westmead Station does not include any provision for current or future bus priority. Bus priority is important for bus customers, and should be considered in light of the identification of the need for the T-Way to T-Way link identified in Future Transport 2056.

Section 6.7.2 - Parramatta metro station

- The construction stage in the Parramatta CBD should include traffic signals at the intersection of George Street and Horwood Place to improve truck and pedestrian safety.
- When PLR changes the direction of Macquarie Street, or introduces a temporary or permanent closure in Macquarie Street. Construction of Sydney West Metro must not cause access to properties in Macquarie Street (between Marsden Street and Smith Street) and Church Street (between Macquarie Street and George Street) to be restricted.
- A second customer entry point to the Parramatta metro station is needed from the west and should be considered in addition to the Civic Link to improve CBD access and local place value.
- At Parramatta Horwood Place is currently a key north-south route for cycling in the CBD. This path will be severed by the project at Horwood Place in construction and Council does not agree that this is a “minor” impact. Once the metro is built, the Civic Link is planned as a shared space that for cyclists and pedestrians, but with PLR on Church Street and significant bus traffic on Smith Street, and interim solution is required to maintain access.
- In the Parramatta CBD, the east-west regional cycling route identified in Council’s Bike Plan is on George Street. The Project should begin to consider how cycling will be safely accommodated in George Street and interchange with the station.
- Interchange and access between Metro, other modes of transport and surrounding land uses will be key issues of interest for Council in the development of the project. Particular concerns and challenges already identified, include:
 - Interchange with Parramatta Light Rail, and Parramatta Train Station – although close, and expected to be connected by the Civic Link, coordination among projects and with neighbouring developments will have to ensure that safe, accessible and attractive paths of travel are provided.
 - Interchange with bus stops on Smith Street, and consideration of the need for greater interchange and review of layover in the CBD.
 - Walking and cycling access to the station, and to major destinations within the CBD from the station, and facilities including ramps and crossings and storage facilities.
 - Accommodating pick up and drop off including not only taxi and ride share services but also private kiss and ride and customers with disabilities.
 - Planning for shared mobility and micro mobility services.
 - Planning for increased crowds and services associated with major events.
- Planning and design for the metro station should incorporate a view of future north-south heavy rail routes through the City, and the project should be designed with respect to:
 - The location of future lines
 - How access and interchange with future lines will be accomplished
 - How future infrastructure will be built.

Section 6.7.3 - Sydney Olympic Park metro station

- Interchange and access between Metro, other modes of transport and surrounding land uses will be key issues of interest for Council in the development of the project. Particular concerns and challenges already identified, include:
 - Planning for interchange with Parramatta Light Rail Stage 2, and the existing train station.
 - Pedestrian connections to the many existing and planned land uses in Sydney Olympic Park.
 - Ample interchange facilities to accommodate increased bus services for residents, workers and visitors from surrounding suburbs including Wentworth Point, Newington, and North Lidcombe.
 - Walking and cycling access to the station, and to major destinations within the CBD from the station, and facilities including ramps and crossings and storage facilities.
 - Accommodating pick up and drop off including not only taxi and ride share services but also private kiss and ride and customers with disabilities.
 - Planning for major events, to serve event needs, and also to maintain usability during events for other users in the precinct.

- Planning for shared mobility and micro mobility services.

Section 6.9 - Clyde stabling and maintenance facility

- A pedestrian, cyclist and vehicle connection from Unwin Street through to Parramatta Road should be maintained at all times, unless approved by Council.
- Work with local government and other stakeholders to identify changes to walking, cycling and street networks to benefit both local and regional connectivity. This includes the use of the former T6 line for a regional scale walking and cycling path of minimum 5m width between Parramatta Road and the PLR ATL at Camellia.

Appendix F Construction Traffic Management Framework

- Chapter 10 Transport and traffic -
 - Page 10-2, 10.3.2 Assumptions Construction hours, Council requests heavy vehicle movement reductions commencing from 2:45pm, rather than 4pm, owing to proximity of schools (Sacred Heart Primary School, Ralph St Westmead; Westmead Public School, Hawkesbury Rd; Mother Teresa Primary School & Catherine McAuley & Parramatta Marist High School, Darcy Rd, Westmead)
 - Page 10-5, “On-street parking, loading, servicing and pick-up arrangements”, consult with PLR regarding proposed kiss and ride in Westmead north of the railway.
 - Page 10-6, Figure 10-3: Hourly heavy vehicle movements at the Westmead metro station construction site, while existing / background traffic movement volumes are not shown, they are likely to be high between 3 to 4pm. Request Heavy vehicle movements reduction commence from 2:45pm, rather than 4pm, owing to proximity of schools (Sacred Heart Primary School, Ralph St Westmead; Westmead Public School, Hawkesbury Rd; Mother Teresa Primary School & Catherine McAuley & Parramatta Marist High School, Darcy Rd, Westmead) – NOTE this is addressed in 10.16.2 Mitigation measures, Reference TT8
 - Page 10-6, Active transport network, Request the temporary pedestrian footpath on the closed section of Alexandra Av accessing the south entrance of Westmead Rail Station to Hawkesbury Rd be widened as a shared path (suggest 3m width minimum) to permit cyclist access, given existing bicycle parking facilities are located there.
 - Page 10-6, Active transport network, pedestrian access from the proposed Westmead Metro Station to the Westmead Hospital precinct is not mentioned. The project presents opportunity to facilitate or improve pedestrian access between these two major attractors, especially given the proposed Westmead Metro Station is located further than the existing Westmead Rail Station. Examples could include:
 - » Provision of widened footpaths for the entire route from Westmead Hospital to Westmead Metro Station
 - » Consider grade separated route options, overhead or underground providing direct entry to Westmead Hospital grounds, avoiding road crossings.
 - Page 10-7, Table 10-10: Westmead metro station construction site public transport impacts, Bus: (issues within the Cumberland Council LGA)
 - » Recommend signalising the intersection on Hawkesbury Rd that will incorporate any bus detour to ensure right turns for buses can be made.
 - » Ensure bus stops relocated from Alexandra Avenue to Hassall St or Bailey St are universally accessible.
 - Page 10-8, Figure 107: Parramatta metro station construction site transport network, Omits:
 - » Existing cycle route on Horwood Place between George St and Macquarie St
 - » Proposed (under construction) Escarpment Boardwalk cycleway between Macarthur St and Parramatta River Weir.
 - Page 10-9, Signposted high pedestrian activity areas given are superseded. Refer to <https://www.cityofparramatta.nsw.gov.au/safespeedlimits>
 - Page 10-11, Active transport network, states “Horwood Place is also designated on-road cycle route of moderate difficulty. As this would be temporarily closed during construction, cyclists would be required to travel via alternative roads. These could include Smith Street or Church Street.”
Correction required – Church St will not be accessible to cyclists to ride through with implementation

of PLR, Smith St has high traffic volume and speed and is an important bus route, and not suitable as an alternate on-road cycle route.

- » The impact of closing Horwood Place will not be “minor”, Council has identified Marsden Street for a north-south cycle route through the CBD, however delivery is subject to funding and design to provide a safe facility.
 - Page 10-11, Ensure alternative haul route which uses Harris St near Macquarie St minimises heavy vehicle use during school zone times as the route passes the frontage of the former Rowland Hassall Public School site considering any future use.
 - Page 10-12, Figure 10-12: Clyde stabling and maintenance facility construction site road network and indicative vehicle routes, Council in collaboration with TfNSW has prepared a consultation paper on connecting the Parramatta Light Rail Active Transport Link (ATL) from Camellia along the T6 line to Parramatta Road. Council requests that a minimum 5m wide pedestrian and cyclist link be delivered prior to construction commencing on Metro West, and an assurance the link will remain open for the duration. This would align with current State Government and Council strategies to deliver short-term, cost effective walking and cycling links on key corridors, and the link is identified in the Sydney Green Grid and Parramatta Ways.
 - » There is insufficient detail at this stage to assess the proposed road layouts in the area and how both pedestrians and cyclists will be accommodated as per existing connections. This is particularly related to changes in levels required to grade separate public access from operational rail needs.
 - Page 10-12, Active transport network, please add proposed use of former Carlingford Railway T6 corridor as regional walking and cycling route from Parramatta Road to the proposed PLR ATL at Camellia.
 - Consultation on spoil haul routes, as well as the 24hr operation of truck movements across all sites should be undertaken, with minimisation of impact to residential areas or those with significant night time commercial activity.
- Section 10.5.4 – Major special events
 - Sydney Metro should notify Council as soon as possible regarding any construction or operational matter that may impact any existing major event in Parramatta CBD.
 - Sydney Metro should consult with Council regarding any construction or operational matter that may impact on any potential event site in the Local Government Area, particularly in the Parramatta CBD.
 - Notification by Sydney Metro should extend to Class 3 Events where an activity being undertaken is likely to impact on the area (such as a public park or street activity).
 - The EIS contains no detail on road pavements and how the existing roads could be affected. There is no information how the excavated material will be removed, how many additional truck movements may be required and which roads could be affected during the construction phase.
 - Technical Paper 1 Transport and traffic, pdf page 96, Sec 4.6 Road Condition. In addition to procedures outlined and providing that road condition be surveyed before and after construction with any damage rectified, City of Parramatta suggests:
 - There should be an agreement between Council, Transport for NSW and their contractor(s) about the responsibility for pavement maintenance during the construction works. For example, for Station Link Project, the contractor was responsible for regular inspections and routine maintenance of affected roads. The purpose of this is to ensure that all defects that affect road safety are identified and fixed as early as possible and the roads are always kept in the safe condition.
 - Impact on long term pavement wear as result in increased traffic should be assessed for all affected roads in accordance with RMS (Transport for NSW) procedures - Roads and Maritime Services Report, Analysis of Marginal Cost of Road Wear - Based on pavement life cycle costing. This compensation to asset owners should be paid in addition to rectification of defects as outlined above.

6. Noise and Vibration

- Concept Design - Assessment is required of both actual and planned sensitive receivers along the Metro corridor within the construction time frame. This requires coordination with precinct plans and future uses.
- Stage 1 - The Roxy Theatre must be considered as a sensitive receiver and not be negatively constrained (by noise or vibration) from adaptively reuse as a future theatre.
- Page 11-17, Figure 11-7: Location of sensitive receivers near Parramatta metro station construction site, shows 126 Church St (Council's administrative offices) as residential. Should be shown as commercial.

7. Non-Aboriginal Heritage

Chapter 12 (Non-Aboriginal Heritage) is focused on the process which will be undertaken to assess heritage items and does not adequately describe the effects of the concept, including station locations, and Stage 1 proposals on heritage items and their curtilage, particularly those within the construction compound and immediately adjacent.

- Non-Aboriginal Heritage (Parramatta)
 - Response to built form including heritage outcomes to comply with the Civic Link Framework Plan and draft Civic Link DCP
 - Kia Ora house to be maintained, surrounding curtilage and public domain structure to reflect or further enhance the outcomes outlined in the draft Civic Link DCP.
 - The Roxy is outside the station zone but immediately adjacent to Metro West station location site. Metro to outline impacts to the future redevelopment of the Roxy including future development constraints.
 - Metro to meet CoPC requirements for Public Art and Interpretation as per the draft Parramatta CBD Art and Heritage Interpretation Strategy and the future Civic Link Art and Interpretation Plan.
- Non-Aboriginal Heritage PAR
 - More information is required on heritage items within construction compound.
 - » At 41-59 George Street, the street façade and roof line are visible from the street. The remaining building fabric is unknown and requires further investigation to inform how this building will be protected during construction.
 - » Kia Ora and associated trees could remain outside the construction hoarding. Trees on Macquarie Street in front of Kia Ora contribute to the setting of both Kia Ora and Memorial Church and should be retained.

8. Landscape character and visual amenity

The 'Landscape Character and Visual Amenity' section is primarily analytical and lacks meaning without a proposal for station locations to assess impacts and outcomes against. Placemaking and design response are not provided for Clyde Dive Structures, Clyde Stabling Facility, and Silverwater Services Facility. Design principles for ventilation stacks, traction substations and service buildings are required to ensure they are well integrated into surrounding fabric and respond to the urban context.

9. Business Impacts

Council acknowledges the benefits the project will bring to the local economy, both during construction and once operational. Council seeks to ensure that construction and operation of the project do not unnecessarily nor unduly impact local businesses.

Chapter 5 – Stakeholder and Community Engagement

- This chapter notes a series of stakeholder and community engagement activities that have occurred, during both the “Project Overview (Business Case)” phase and “EIS preparation” phase of the project.
- It is generally unclear as to what targeted community engagement has occurred in any phases of the project, particularly in “business readiness” for the construction phase of the project for effected business. The EIS only details general communication provided to the public at large, and ad hoc communication at major milestones via letterbox drop. A more robust communication loop should be developed to ensure affected businesses are made aware of project developments as soon as possible, and actively engaged throughout the construction phase.
- The EIS mentions the engagement of Place Managers (Sec 5.7.3) “to support Sydney Metro’s role in creating places and achieving good outcomes for each station precinct”. - Based on the information provided, it is unclear as to how this resource is being utilised to support both businesses and the community, what their role is and how the information they collect feeds into the Project Team. Details of these Place Managers and further description of their community relations role should be communicated with Council.

Chapter 14 – Property and Land Use

- Section 14.6 – Westmead - Opportunities to maximise the commercial floor space in close proximity to the station precinct and interchange, particularly of local commercial services should be explored in conjunction with local Councils and DPIE.
- Section 14.7 – Parramatta - Owing to the station’s location, opportunities both to maximise high-value commercial office space, and active ground floor space within the development site should be considered.
- Section 14.10 – Sydney Olympic Park - The EIS notes the proximity of the future station to commercial zoned land in Sydney Olympic Park. As part of the facilitation of the Sydney Olympic Park Master Plan 2030 – consideration of TOD to maximise the investment opportunities and the attraction of commercial development to facilitate job opportunities in the precinct in pursuit of the 23,000 jobs target. A consideration as to whether the Master Plan will maximise these opportunities should be considered.

Chapter 16 – Business Impacts

While the use of a 400m radius around construction site is a reasonably robust “business affectation area”, place-based consideration of impacts beyond this 400m buffer (where making large changes to an existing transit corridor, for example), should be considered to ensure impacts are best mitigated and information shared widely and in a timely manner.

Direct potential impacts – general

- It is unclear what support Transport for NSW is providing directly affected businesses in seeking alternative properties (or other relevant support) where their existing premises are subject to acquisition by the project.

Indirect potential impacts – general

- While the impact of temporary traffic congestion and travel time, and loss of parking is likely to be mostly impact businesses within 100m metres of a construction site, it is recommended that impact analysis of any change to parking or traffic consider a much larger catchment (at least 400m).

- Impact mitigation on amenity at locations should be place-based and seek to maximise opportunities for businesses to trade as usual (operating hours and model). Support should be provided where businesses are forced to make accommodations or changes to the way their business operates as a result of the project.
- Any temporary power and utility interruptions should be planned well in advance and conducted at the most convenient time for effected businesses.
- The net positive opportunities for increase in passing trade and the redistribution of trade are acknowledged. Transport for NSW should consider mechanisms within their business support package to assist businesses to maximise these opportunities, where they exist.

Potential indirect impacts – Westmead metro station

- A business impact assessment for the Westmead metro station should more closely consider the interface in construction with Parramatta Light Rail, as well as other major construction projects. This is not mentioned in the EIS.
- While the potential impacts on businesses within the City of Parramatta LGA are limited (due to the location of the station box on the south-side of the existing heavy rail line), support for local business to minimise any potential impacts to their operations (or to maximise any benefits), should be considered.

Section 16.7 – Potential indirect impacts – Parramatta metro station

- A business impact assessment for the Parramatta metro station should more closely consider the interface in construction with Parramatta Light Rail, as well as other major construction projects. This is not mentioned in the EIS.
- It is not agreed that temporary traffic congestion and increased travel times are “unlikely” to have an impact in the Parramatta CBD (with a “slight negative” significance). Recent experience as to the impacts of major construction to both parking and traffic are significant, and should be considered, particularly when compounded by existing construction, the addition of heavy haul vehicles to remove construction materials and spoil.
- Further detail as to minimisation of the impacts to local amenity should be articulated, including directional wayfinding, activation support and the like (in addition to hoardings, as identified).
- Safety and security considerations should seek to minimise opportunities for opportunistic crime to occur, and the minimisation of dark spots.
- Further consideration as to techniques to assist business in maintaining maximum trading, and cease potential opportunities afforded by additional construction worker trade.

Section 16.8 – Potential indirect impacts – Clyde stabling and maintenance facility

- Potential impacts to the local road network (which are already heavily constrained) should be modelled and considered as part of a Construction Traffic Management Plan for the area. This is particularly pertinent due to extra traffic impacts from Parramatta Light Rail Stage 1 construction.
- Further consideration as to techniques to assist business in maintaining maximum trading, and cease potential opportunities afforded by additional construction worker trade.
- Both the City of Parramatta’s Economic Development Plan (2017) and Destination Management Plan (2018) identify the Rydalmere-Rosehill-Silverwater area as priority economic precincts. They note that the Rosehill Gardens Racecourse and Events Centre and the Valvoline Speedway should be “promoted and leveraged as national and international leisure and business events destinations”. Council sees Rosehill Gardens and the raceway as key visitor assets and destination partners in helping to realise the overall vision and objectives for the City’s visitor economy.
 - The EIS does not acknowledge the importance of this precinct to the City of Parramatta’s economy.
 - The EIS should recognise the short, and long term impacts of removal of the Valvoline Speedway and identify risks and possible mitigations to access and amenity of the Rosehill Raceway.

Section 16.7 – Potential indirect impacts – Silverwater services facility

- Consultation should be undertaken across the precinct to understand any impact of the construction of freight haul routes and access requirements for heavy machinery, delivery trucks and the like.

Section 16.8 – Potential indirect impacts – Sydney Olympic Park metro station

- Further detail as to minimisation of the impacts to local amenity should be articulated, including directional wayfinding, activation support and the like (in addition to hoardings, as identified).
- Safety and security considerations should seek to minimise opportunities for opportunistic crime to occur, and the minimisation of dark spots.
- Further consideration as to techniques to assist business in maintaining maximum trading, and cease potential opportunities afforded by additional construction worker trade.

10. Social Impacts

Generally, insufficient detail has been provided to fully assess the socio-economic, land use and property impacts of the concept design or stage 1 proposal. The location of stations within the areas indicated in Chapter 7 (Place Making) will trigger development in the surrounding precinct, which will be difficult to assess without a more detailed understanding of the scope of the Metro proposal and surrounding precinct plan (which will presumably indicate proposed public domain structure, built form and public space outcomes).

Connections indicated in the precinct diagrams result in large development parcels that may not enable CoPC vision for the commercial core's capacity and built form. The opportunity is to coordinate the street and block pattern needs with future development form early in the place-based design process to achieve integrated high-quality built form and public domain outcomes.

It is likely streets and public spaces will be dedicated back to Council for management, however without an understanding of the proposed precinct plan it is difficult to comment on the adequacy of the concept from a future asset management and ownership perspective or whether infrastructure upgrades required to facilitate are in scope (eg: infrastructure needed for pedestrian connectivity in Rydalmere and Camellia).

To create a successful precinct interchange between modes within the heart of Parramatta, further analysis of pedestrian volumes and their spatial requirements is needed to inform size, shape and functionality of the public domain within surrounding street, the urban block and immediate station precinct. This may also limit development footprints.

The EIS does not adequately address the social and economic impact on recreation facilities including the Rosehill Racecourse and Clyde Speedway. Both the City of Parramatta's Economic Development Plan (2017) and Destination Management Plan (2018) identify the Camellia/Rosehill area as an important precinct for the economic, social and recreational social services they currently provide and their future potential to provide expanded opportunities.

Section 7.8 - Crime prevention through environmental design

- As part of any design, all four CPTED principles identified by the NSW Police per the "Safer by Design" Guidelines, should be considered and utilised. A space/activity management CPTED strategy should be identified. Promoting safe nodes of transfer (particular from metro to external modes of public transport) should be a key principle.

11. Contamination

- Reuse of spoil as required under sustainability initiatives can lead to poor quality landscape outcomes including but not limited to unnecessary mounds, embankments, spoil retention pits and retaining walls. Ensure spoil reused as part of the project is integrated into the urban context and does not adversely affect future development potential.
- Strategies for management of contaminated land often lead to retention of contaminated spoil on site and insitu. Ensure contaminated land strategy is coordinated with public domain structure plan and accompanied with certification of clean fill on all lands dedicated back to Council.

12. Hydrology and flooding

Infrastructure proposed as part of Sydney Metro West lies within flood prone areas, notably Parramatta Metro Station and Clyde Stabling and Maintenance Facility. Understandably, for the benefit of all stakeholders, City of Parramatta Council seeks to ensure no adverse flooding impacts arise. The principal issues are:

- Likely impact to flood behaviour Clyde Stabling and Maintenance Facility.
- The Facility is located at the confluence of A'becketts Creek, Duck Creek. Filling of the site to protect the Facility from flooding may worsen flooding properties upstream. Mitigation through high flow, high volume watercourse canalisation could be destructive in the event of culvert blockage by debris.
- Overland flow may be obstructed by Parramatta Metro Station. The Station's location is at a natural dip along Macquarie Street with guttering along Horwood Place providing an overland flow to Parramatta River.

Detail on issues raised by the EIS on Flooding are:

- Reference should be made to Council's adopted flood studies:
 - The Upper Parramatta River Catchment Trusts Flood Study results (Draft 8) and Management Study and Plan, prepared by Bewsher Consulting, Dated 2003.
 - The Lower Parramatta River Flood Study, prepared by SKM, Dated 2005.

Council is currently drafting Parramatta River Flood Study prepared by Cardno in 2019. When adopted this should be referenced in appropriate SMW investigations and designs.

- Section 21.4.2, Table 21-3 Existing flood behaviour for Stage 1 Construction sites, Page 21-3 – Provides details of the flood behaviour during construction. It is unclear how the identified flood risk impacts will be addressed in the final design.
- Section 21.6.1 Potential Impacts on flood behaviour during Stage 1 - It is unclear what permanent changes to flood impacts and hydraulic flood hazard flow conditions are expected on completion of the project.
- Section 21.6.5 Potential impacts to emergency management arrangements - Note that the potential risks of flooding at these locations extends beyond the construction period. It is unclear how these sites and access to these sites for flood emergency response will be protected after final construction.
- Section 21.6.7 Cumulative Impacts - Modelling for Metro, in referring to the draft Camellia master plan, that if Stage 1 of the Metro is built, may increase the PMF level at the Parramatta CBD metro station construction site "by up to about 0.5m". It is unclear how this referenced assertion is supported.
- Section 21.7.2 Mitigation Measures, Table 21.7 –
 - Appropriate consultation and planning of flood emergency management with NSW State Emergency Services should extend beyond the construction stage of these works and should include any impacts due to permanent changed flood conditions.
 - There was no mention of other critical infrastructure such as the location and flood protection of electrical power substations and the flood protection of fresh air ventilation systems and emergency evacuation access points within the floodplain.
- Technical Paper 9 – Hydrology and flooding – Stage 1
 - Section 2.3 Sources of data, Table 2-1, Page 7 - No flood map inundation and level comparisons were made to Council's adopted Lower Parramatta River Flood Study levels prepared by SKM 2005 and to Council adopted Draft 8 Upper Parramatta River Catchment Trust Flood Study results.
 - Flood modelling sensitivity checks and comparisons should also be made to flood levels and flood hazard flow conditions based on the new ARR 2019 methodology for a 1% AEP flood event.

- Any flood and drainage impacts to the proposed works due to limitation in hydraulic capacity of council's stormwater drainage system(s) should be addressed and any recommended improvements delivered as part of the Sydney Metro West project.
- Clear arrangements should be proposed for permanent pumping of tunnels' seepage water and treatment of this water prior to discharge.
- Applicant's Flood Consultant Conclusions and Recommendations, B.5 Conclusions and recommendations - The Flood Consultant's conclusions appear to minimise the consequences of this proposal by focussing on numerical outputs from computer models rather than analysing the holistic impacts of this work in the floodplain.
- Part D: Synthesis, Risk Analysis and Conclusion, pp28-10 - This EIS Risk Assessment appears to be mainly focussed on construction phase issues rather than the long term consequences and risks for the flooding environment because of the stabling and maintenance facility, and its associated track, tunnels, culverts bridges, embankments, retaining walls and filling in this highly flood affected site.
- EIS 28.6 Conclusion and Next Steps, p. 28-12, Flooding and Hydrology are identified as having 'a medium residual risk'. This appears to be an understatement of the Risk overall.

13. Biodiversity

Most sites proposed by Sydney Metro West are within highly urbanised or industrial environments with limited vegetation. The Clyde Stabling and Maintenance Facility while in an industrial setting borders watercourses. Although these watercourse are modified with degraded narrow riparian zones, they contain patches of mangrove forest. The principal issues are the likely reduction to riparian habitat at the Clyde Stabling and Maintenance Facility.

The Facility is located at the confluence of A'Becketts Creek, Duck Creek. Filling of the site to protect the Facility from flooding and mitigation through high flow, high volume watercourse canalisation would severely degrade the ecology. Removal of vegetation may affect wildlife foraging, fish habitat and reduce water quality.

Detail on issues raised by the EIS on Biodiversity are:

- Estimated loss of 300 trees at Clyde – numerous ecological and aesthetic impacts, change to soil water profile and soil permeability, increased temperatures in the local area
- The proposed new bridges over A'Becketts and Duck Creeks provide important opportunities to improve roosting habitat for threatened insectivorous bats such as the Southern Myotis (*Myotis macropus*) that often use bridges over watercourses and have been identified as likely to utilise these riparian corridors. This is consistent with the Office of Environment and Heritage priority actions for the Southern Myotis (*Myotis macropus*) that include 'promote roosting habitat in new artificial structures'. The underneath of these bridges should incorporate suitably dimensioned cavities and lattice structures to provide permanent microbat habitat (as roost boxes only provide temporary habitat due to deterioration and also require ongoing maintenance).
- A wider vegetated riparian zone is required to minimise impacts on A'Becketts and Duck Creeks during both construction and ongoing operation of the stabling and maintenance facility. This vegetated riparian zone (VRZ) is to be in accordance with NSW Department of Industry Guidelines for controlled activities on waterfront land - Riparian Corridors (2018), being a minimum of 20m (Duck Creek) and minimum of 10m (A'Becketts Creek) to provide for an adequate buffer zone between the facility and waterways that ensures:
 - bed and bank stability by reducing bank and channel erosion
 - water quality protection by trapping sediment, nutrients and other contaminants
 - diversity of habitat for terrestrial, riparian and aquatic flora and fauna
 - connectivity between wildlife habitats.
- The establishment of the VRZs should be guided by a Vegetation Management Plan (VMP) to provide for a complete vegetation stratum (trees / shrubs / groundcovers) utilising species from locally endemic vegetation communities.

Council supports the application of State of NSW environmental planning requirements, which have been established to protect and enhance the natural, social and economic value of the catchment, foreshores and waterways of Sydney Harbour. However, it is not clear from the limited amount of design detail and analysis provided in the EIS how the project meets these requirements and guides.

Council would note that the SREP objectives, requirements and guidelines aim to not only minimise impacts but to improve environmental conditions and outcomes. This is particularly relevant in relation to the site of the Clyde Stabling yards facility.

In respect to SREP planning requirements and the assessment under EIS section 4.3 table 4-2 the following comments are made:

- Sydney Harbour Catchment Sydney Regional Environment Plan(2005) with regard to
 - Part 6 (Wetlands protection) – A 40m wetlands protection zone has been identified along Little Duck Creek and A'Becketts Creek. Refer SREP 2005 wetlands protection map sheet 1

- Clause 21 (Biodiversity, ecology and environment protection) - It is unclear to council from the current concept detail and the level of detail in Section 8.16 (biodiversity Concept) and Chapter 22(Biodiversity Stage 1) how the objectives are being met.
- Clause 22 (Public access to, and use of, foreshores and waterways) – Foreshore access along the Little Duck Creek corridor would be of great benefit to the local community, Workers, residents and visitors. The EIS assessment notes that “The Concept would not affect public access to waterways”. Council would note that the objectives of Clause 22 in the SREP is to improve waterway foreshore access, does this mean that access is proposed to be provided as part of the concept. This would further align with future plans Council has for the access in the surrounding area.
- Clause 25 (Foreshore and waterways scenic character) – The assessment of scenic character impacts at Clyde Stabling Yards(15.7.2) appears not to follow or respond to the landscape character types and visual impact and mitigation guidelines identified under the SREP and the Sydney Harbour Foreshores and Waterways Area Development Control Plan (2005).
- Further to the points above Council notes that the proposal includes significant in-stream works, including channel modification/ realignment. Under the Sydney Harbour Catchment Sydney Regional Environment Plan(2005) zoning identified for the Clyde Stabling Yards facility land reclamation is specifically prohibited.

Recommendations:

- Establishment of vegetated riparian zones along Duck Creek and A’Becketts Creek in accordance with a Vegetation Management Plan consistent with the NSW Department of Industry Guidelines for controlled activities on waterfront land - Riparian Corridors (2018).
- Design of the new A’Becketts Creek and Duck Creek bridges are to incorporate suitably dimensioned cavities and lattice structures underneath to provide important low maintenance roosting habitat for threatened insectivorous bats.

14. Sustainability and climate change

Sustainability is a core consideration for the City in all its development planning and we are acutely aware of the importance of reducing long term Greenhouse Gas emissions, promoting resilience and adaptation to climate impacts and creating a public domain that is healthy and active for both residents and workers who transit the City.

We welcome the project's commitment to 100% offset of operation electricity emissions and 25% of construction electricity emissions as well as the commitment to an IS rating of 75 and 5 star Green Star. Council additionally encourages greater detail; particularly at the station and precinct level with respect to the applicable boundaries and specific outcomes regarding reducing Greenhouse Gas emissions on site, precinct and station level responses. to resilience and adaption to climate change as well as initiatives that promote healthy and active urban environments in and around the stations located within the City of Parramatta.

Council submits the following comments and recommendations concerning sustainability:

With regard to the requirement for the project to reduce and mitigate its impacts with regard to ecologically sustainable development, it is noted that an overarching organisational level commitment to sustainability is demonstrated. However, there is no clear demonstration of this translating to a planning response and ultimately a design, construction and operational delivery beyond the high level commitment to a IS score of 75 and a 5 star Green Star rating. It is noted that 100% of operational electricity emissions and 25% of construction emissions will be offset however the mechanism for providing this commitment is unclear. It is encouraged that offsetting should be in the form of RECs and should be additional to any legislated renewable energy targets.

Recommendation

The planning level sustainability response should establish key sustainability rating and accounting boundaries and confirm commitments are achievable and translated into the relative design and construction requirements.

Council notes the following requirements expressed in the EIS: "Sustainability Operating costs are reduced. Effective and efficient use of resources. Conservation of natural resources is maximised," and that "The sustainability of the Proposal in accordance with (as relevant) Green Star or the Infrastructure Sustainability Council of Australia (ISCA) Infrastructure Sustainability Rating Tool (or equivalent) and commit to an appropriate target rating." It is noted that an IS rating 75 and a 5 star Green Star rating are committed to in section 8.20.3. However, no assessment or targeted pathway has been provided to confirm the design will be capable of achieving these outcomes nor has there been any appropriate boundary definition as to which parts of the project will have specific ratings applied.

Recommendation

Provide a project keyplan showing rating applicability and indicative assessment of the proposal in line with the requirement.

With regard to the requirement for "Air quality, greenhouse gas and energy, climate change adaptation, waste management and resource use, hazard and risk assessments should be undertaken in accordance with the commitments in Section 7 of the Scoping Report", Council makes the following observations and recommend:

- Scoping Report: section 7.15.2 commits to a "concept level greenhouse gas and energy assessment will be carried out as part of the Environmental Impact Statement."
 - Council notes that No assessment has been provided that would identify major targets or impacts. No boundary definition has been provided for what emissions will be included or excluded.

- Scoping Report ITEM 7.16.2: Proposed assessments “A concept level climate change adaptation assessment”
 - A limited assessment has been provided which identifies 6 medium level risks primarily focussed on water and hydrology. The assessment should be broadened to consider temperature impacts, particularly at the western end of the line around Parramatta and the risk impacts beyond the site of failure of the project as a key element of infrastructure as well as health and safety impacts to staff and patrons of the infrastructure.
- Scoping Report ITEM 7.17.2: Proposed assessments “A concept level waste management and resource use assessment”
 - It is recommended that the assessment include numerical quantification to appropriately inform the response.

15. Property and Land Use

Chapter 14 – Property and Land Use

- The EIS indicates that 70 Macquarie St forms part on the Metro site. This is not the case and is not part of the compulsory acquisition. Council requires use of this site until April 2022 to facilitate building of the 5 Parramatta Square development.

16. Draft amendments to State Environmental Planning Policy (Infrastructure)

Council notes that the draft amendments to the State Environmental Planning Policy (Infrastructure) 2007 (the Infrastructure SEPP) relating to the protection of the corridor for the Sydney Metro West project are being exhibited concurrently with the draft EIS for the Sydney Metro West.

Specifically, the amendments insert a map of an interim metro corridor into the SEPP and require consent authorities to notify Sydney Metro of Development Applications within 7 days of lodgement within the identified land and seek concurrence before for development can be approved. Council notes DAs that will need to be notified and obtain concurrence will include those that involve penetration of ground to a depth of 2m or more; or with a capital value of more than \$200,000. The proposed provisions will last for up to three years, to provide time for the project to be approved and any necessary acquisitions to occur.

Similar provisions already exist in the Infrastructure SEPP for other rail corridors, including the Sydney CBD metro corridor (clause 88 – Development within or adjacent to interim rail corridor).

Council understands that while the proposed amendments may result in longer determination timeframes or design alterations for some DAs, the measures will assist with protecting the rail corridor from development that may affect its design, cost or delivery. Council considers that thresholds for requiring concurrence are very low, and may cause delay unnecessarily to DAs which are unlikely to impact the metro project. Council would welcome reconsideration, or further explanation of how the thresholds are determined.

To assist with the identification of the DAs that will need to be notified and concurrence sought from Sydney Metro, Council requests that the relevant GIS files of the corridor be sent to Council once the amendments to the SEPP are made. Council also notes as a consequence of the amendments to the Infrastructure SEPP that complying development provisions of 1.17A(1)(a) of the Exempt and Complying SEPP would be switched off in the corridor.

Attachment 1:

Submission to Sydney Metro: In response to strategic station options for Sydney Metro – Rydalmere

Resolved by Council 16 December 2019



**CITY OF
PARRAMATTA**

Submission

To Sydney Metro

In response to *Strategic station options
for Sydney Metro - Rydalmere*

Resolved by Council
16 December 2019

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1. INTRODUCTION

Council wishes to thank Sydney Metro for the opportunity to provide a submission to this public consultation on strategic station options for Sydney Metro West, and looks forward to continuing to work closely and proactively with Sydney Metro as the project is further refined and considered by the NSW Government.

In its submission to the Project Overview for Sydney Metro West in May 2018, Council considered that there is significant value in providing an intermediate Sydney Metro West stop at either Rydalmere or Camellia. Council noted that both precincts are important employment precincts, with part of Camellia being considered for residential growth. While acknowledging that future Metro stops within either of these precincts would have the effect of significantly improving access to and from these precincts and facilitate redevelopment opportunities. Council advocated for an intermediate station at Camellia (in preference to Rydalmere) to facilitate the expected growth associated with the draft Camellia Town Centre Master Plan. Council urged attention to the following considerations:

- effects of Sydney Metro West as a catalyst for urban renewal and to support future growth;
- relationship with strategic planning for these centres (i.e. draft Camellia Town Centre Master Plan, Parramatta Employment Lands Strategy);
- integration with Parramatta Light Rail (Stages 1 and 2) and the broader public and active transport network;
- Supporting existing and future employment opportunities and educational facilities.

In this submission to the current consultation regarding strategic station options for Sydney Metro West, Council's position is consistent with the previous submission. Council continues to advocate for an intermediate station on Sydney Metro West to serve additional employment and dwellings between Parramatta and Olympic Park. Council prefers that this station be located in Camellia rather than Rydalmere. Council acknowledges that benefits may accrue from the alternate locations identified by Sydney Metro West such as Rydalmere, Rosehill, Silverwater East and Silverwater West, or identified by Council at Newington, and requests to work with Sydney Metro to re-evaluate these alternatives and to ensure preservation and increased utilisation of employment lands.

2. NEED FOR AN INTERMEDIATE STATION

There are significant local and metropolitan benefits in city-shaping and transport accessibility which will accrue from locating an intermediate station between Parramatta and Sydney Olympic Park as part of Sydney Metro West, and these are outlined below. Specific impacts of each location are detailed separately in the sections following.

2.1. City-Shaping Benefits

The vision of the State Government is outlined in the Greater Sydney Regional Plan and Future Transport through the Three Cities is shared, and strongly supported by Council. This significant investment in Sydney Metro West is welcomed as critical to enabling this vision, however establishing a "Parramatta Intermediate" station between the CBD and Olympic Park would deliver greater benefits of this investment to the wider Greater Parramatta and Olympic Peninsula (GPOP) area and Central River City.

Sydney Metro West is a metropolitan scale investment that will establish the spatial framework for GPOP and the Central City District for future generations. While the impacts to any precinct can be clearly quantified, Council holds that there is a benefit to the Parramatta CBD and GPOP in more intensive land use within a short distance from the Parramatta CBD, while Parramatta itself is rapidly growing. Council sees the location of an intermediate station as an opportunity to establish a supporting suburb of Parramatta CBD of a scale to complement the Parramatta CBD and Westmead Innovation District, and catalyse significant employment opportunities that build on the opportunities and established character of existing employment lands.

Council considers that a Metro Station could catalyse opportunities for diverse businesses such as technology, smart manufacturing, back office services, events and recreation, which are not able to be located in the Parramatta CBD, but are enabled and activated through high quality connectivity. Attracting these business to a revitalised precinct in proximity and well-connected to Parramatta CBD would deliver agglomeration benefits that would benefit not just the new precinct, but also GPOP and on a District scale.

In short, Council considers that this is an opportunity to move toward the reality of a Metropolitan scale Central City as per the shared vision of Council and the State Government.

2.2. Transport Benefits

Locating an intermediate station will result in tangible transport benefits for residents, workers and visitors in the chosen precinct and regionally within GPOP and the District. A station will generate network benefits which will affect users of adjacent services, reduce the number of customers transferring in Parramatta, and improve the operation and resilience of the broader transport network. The current Metro West proposal identifies new Metro Stations only in close proximity to existing heavy rail stations, and merely amplifies existing public transport catchments. An intermediate station would be transformative in establishing new accessible areas within the Central City.

A station in Rydalmere or Camellia would clearly magnify the benefits of Parramatta Light Rail Stage 1 and the proposed Stage 2. Workers, visitors, students and residents along the current Carlingford line heading east toward Sydney Olympic Park or the Eastern Harbour City would benefit greatly from

being able to transfer directly to Metro West.

This proposal would also provide distributed interchange benefits. Rather than requiring all customers to transfer at one large interchange that is already under pressure, multiple nodes are established to encourage efficient use of the network. The Eastern Harbour City, with multiple train lines and stations benefits from distributed interchange. Parramatta CBD will benefit similarly to its west, as the Westmead Metro Station will provide easy transfer to the adjacent to the Westmead Train Station and the Northwest T-way. Providing an interchange point with Parramatta Light Rail (PLR) or future bus services at a Parramatta Intermediate station will improve access to Metro for all suburbs in GPOP's eastern precincts, and reduce congestion at Parramatta train and Metro stations, and help facilitate the vision outlined in Future Transport.

2.3. Travel Time

Council supports the objective of Sydney Metro West to provide a fast connection between Parramatta and Sydney CBDs, and it is understood that additional stations may compromise the travel time between the two. However, the benefits of an intermediate station for the Central City and GPOP need to be carefully weighed in relation to slightly increased travel times, if any.

Council notes that the Sydney Metro West Scoping Report reports that an alignment including "about 9 to ten stations from Greater Parramatta to the Sydney CBD" was the preferred strategic alignment due to its ability to deliver a balance between travel times and servicing precincts along the line. Given that eight short listed stations have been announced for Sydney Metro West, and two, Rydalmere and Pyrmont are subject to further analysis; Council considers that travel time should not be a disqualifying consideration to an intermediate station between Parramatta and Sydney Olympic Park. If an optional station is pursued, Council contends a Parramatta Intermediate station would better address the regional jobs imbalance over one at Pyrmont.

Council has reviewed the shortlisted stations for Sydney Metro West announced by the State Government, and notes station spacing is very wide in the western section of the line, very close in the middle, and fairly close in the east. Given the close station spacing between Sydney Olympic Park and Five Dock (four stations in less than 7 km,) Council queries whether trains can be expected to travel at top speed in the 7km section between Parramatta and Sydney Olympic Park. This in turn may affect whether trains travelling along the line will need to adjust their speed to maintain consistent headways and not "catch-up" to the preceding train. Council would welcome the opportunity to work with the Sydney Metro West to understand how a Parramatta Intermediate station would impact overall travel time objectives.

3. CAMELLIA

In its submission to the Project Overview for Sydney Metro West in May 2018, Council advocated for a station at Camellia, in preference to Rydalmere, to facilitate expected growth associated with the draft Camellia Town Centre Master Plan (draft Master Plan).

Council noted that the draft Master Plan sought to provide for up to 10,000 dwellings across the Town Centre with 25,000m² of retail/commercial space located in proximity to one light rail stop. Council referred to its previous submission to the draft Master Plan, in which it also called for a Metro station, and reiterated that a Metro station will be needed to meet the transport needs of future population and land uses.

Council now reiterates its position that an intermediate stop should be located in Camellia.

Council considers that without a Metro station, Camellia has little to no chance of developing into a town centre with good connectivity. Should the DPIE proceed with Camellia as a Town Centre of 10,000 dwellings plus supporting commercial and retail uses, PLR will be inadequate to meet the public transport demand generated in the precinct. Furthermore, the introduction of a Metro station at Camellia may be the catalyst to significantly impact mode shift towards public transport within the new Camellia Town Centre. Depending on the thresholds, a commitment to a metro station at Camellia would not only address the key transport constraints relating to the development of the Camellia Town Centre but may also reduce the need for other significant road upgrades previously required under the draft Masterplan to facilitate redevelopment and remove some of the precinct's dependence on James Ruse Drive.

Both the City of Parramatta's Economic Development Plan (2017) and Destination Management Plan (2018) identify the Camellia/Rosehill area as an important precinct for the economic, social and recreational social services they currently provide and their future potential to provide expanded opportunities. Both plans identify the Rydalmere-Rosehill-Silverwater area as priority economic precincts. They note that the Rosehill Gardens Racecourse and Events Centre and the Valvoline Speedway should be "promoted and leveraged as national and international leisure and business events destinations". Council sees Rosehill Gardens and the raceway as key visitor assets and destination partners in helping to realise the overall vision and objectives for the City's visitor economy.

Additionally, Council resolved on 28 October 2019, to write to the Premier and her Ministers to advise Council's complete support for Valvoline Raceway, Parramatta to remain in its historic and present location due to the land being recreational land. The proposed location for the facility, at the confluence of A'becketts Creek and Duck Creek will negatively impact the Central City's cultural, environmental and recreational assets, most notably the two creeks, the speedway and racecourse. Council suggests that the planned stabling and maintenance facilities for Parramatta Light Rail, in Rosehill, just south of Grand Avenue would provide a better location for the metro facility, and asks if the metro facility could be co-located with the light rail facility.

Council considers that location of a Metro station in Camellia is vital for the continued success and future redevelopment of the precinct as employment lands, and looks forward to the precinct realising its potential to contribute new employment, events and recreational opportunities for the Central River City.

Council is aware of the constraints on the Camellia Precinct, including transport access, flooding and contaminated land. It is also acknowledged that the recently released draft Place-based Infrastructure Compact by the Greater Sydney Commission emphasises these constraints in its recommendation that Camellia not proceed as a development precinct at this time. Nevertheless, Council notes that location

of a Metro stop within easy access of re-development sites would be a stimulus to address the constraints in the precinct.

The Scoping Report for Sydney Metro, exhibited by the Department of Planning, Industry and Environment (DPIE) to support the State Significant Infrastructure application for the project discusses the evaluation of potential intermediate stations. A summary of the assessment was provided (see Figure 1). Other than the scores and outcomes, very little detail is provided. There are no definitions of criteria, nor indication of how they were scored, nor explanation of how the various criteria were weighted against each other.

Shortlisted station location option	Evaluation criteria						
	Strategic alignment	Productivity & jobs	Housing supply	Urban renewal & place-making	Customer benefits	Transport integration	Deliverability & value
Rydalmere	●	●	●	●	●	●	●
Camellia	●	●	●	●	●	●	●
Rosehill	●	●	●	●	●	●	●
Silverwater East	●	●	●	●	●	●	●
Silverwater West	●	●	●	●	●	●	●

Figure 1: Excerpt Table 3-7 from Sydney Metro West Scoping Report (Nov. 2019) Source: Sydney Metro

Council is interested in better understanding this analysis. It is not clear, for example, why Camellia scored poorly in 'Strategic alignment' compared to Rydalmere, as Camellia is the subject of a State-led master planning process. Likewise, it is not clear why Rydalmere scores higher for 'Productivity & jobs,' 'Housing supply' and 'Urban renewal and placemaking' than Camellia, as Table 1 outlines below.

Location	Additional dwellings	Additional commercial and retail employment space
Camellia	10,000	200,000m ²
Planning Proposal at 266 Victoria Road, Rydalmere	2,544	18,807m ²
Planning Proposal at WSU North Campus, Rydalmere	1,110	6,160m ²

Table 1: Additional dwelling and employment numbers, Camellia and Rydalmere

Camellia currently has proposals for residential intensification, and greater opportunity for commercial redevelopment and urban renewal than Rydalmere. Regarding the scoring for 'Transport integration' Council notes that options in Rydalmere, Camellia and Rosehill that would connect to Parramatta Light Rail Stage 1, should have higher scores than locations in Silverwater that would connect only to buses. Council would welcome the opportunity to work with State agencies to understand and provide local knowledge into this assessment.

A station in Camellia would have similar benefits for residents along the current T-6 Carlingford train line as detailed in the previous sections; additionally it would improve transport access for residents of Rosehill, and if properly connected with active travel facilities, could provide additional public transport options for residents of North Granville and Clyde. A Metro station in Camellia would also greatly improve accessibility for visitors and racegoers attending Rosehill Gardens.

Council also notes that a station at Camellia rather than Rydalmere reduces the amount of diversion for Metro West, thereby reducing track and tunnel length, eliminating introduced curves, and reduces assumed risks associated with tunnelling under the Parramatta River.

4. RYDALMERE

In its submission to the Project Overview for Sydney Metro West in May 2018, Council recommended that planning for a station in Rydalmere should include consideration of the context of the existing land use form and the capacity for the precinct to remain a Key Employment Precinct supporting primarily light industrial development uses.

The Rydalmere precinct is vitally important to the City of Parramatta, contributing significantly to the local, regional and the state economies, supporting a large and diverse workforce of over 10,000 in the education and manufacturing sectors. As detailed in Parramatta Employment Lands Strategy (2016), Council is committed to the retention of the area's industrial lands, and the expansion of key industries to support local jobs growth. Transformative transport infrastructure, such as Sydney Metro West would enable Rydalmere to further develop its capacity to accommodate an expanded and transformed workforce, and better connect Western Sydney University's campus to the broader region. It would also support the identified role of the WSU North Campus and site at 266 Victoria Road, Rydalmere in providing growth in dwellings and employment.

However, a Metro station in Rydalmere may increase residential development pressure in the areas of the precinct that are currently zoned industrial, which would compete with the goals of the Employment Lands Strategy.

A station in Rydalmere would magnify the benefits of Parramatta Light Rail Stage 1 for residents along the current T-6 Carlingford train line as detailed in the previous section. A Metro stop in Rydalmere would be beneficial for the T6 corridor, could help drive high quality development and urban design outcomes in the corridor.

Rydalmere is about 1.5 km north of a straight alignment between Parramatta and Sydney Olympic Park, a station in Rydalmere would represent a significant diversion for travellers moving between Parramatta and the Eastern Harbour City. In addition to a time penalty, diverting the route to Rydalmere would add curves to the track, decreasing passenger comfort for all trips. Council also notes that locating a station in Rydalmere may increase costs and risks for the project associated with additional tunnelling and excavation near the Parramatta River.

Council notes that known constraints in the precinct include protection and encouragement of employment lands, detailed above, existing constraints on surface roads and potential flooding in the precinct.

In response to Parramatta Light Rail Stage 1, Council is currently preparing a corridor Structure Plan from Harris Park to Carlingford that will be released in the new year. Should a station be confirmed in Rydalmere, a Structure Plan for the entire precinct should be prepared that aligns with current Council planning, and with a focus on the issues outlined below:

- guide development to support a range of employment uses with a focus on increasing employment densities as detailed in the Employment Lands Strategy,
- manage residential development,
- consider the interface of the station and any new development with the Western Sydney University campus,
- mitigate existing deficiencies and constraints, and
- constraints on the road network.

5. OTHER LOCATIONS

Council notes that in the event that both Camellia and Rydalmere are not selected for stations, there are other precincts between Parramatta and Sydney Olympic Park where inclusion of a Metro station would yield obvious benefits. Council considers that alternative station locations may be preferential to no station at all in the long distance between Parramatta and Sydney Olympic Park.

In its submission to the Project Overview for Sydney Metro West in May 2018, Council advocated for a station and/or comprehensive and significant increases to public transport to be considered within the Newington/Silverwater/North Lidcombe Precinct in order to provide a direct connection of these precincts with Westmead, Parramatta CBD and Sydney CBD.

Locations such as Rosehill and Silverwater present real opportunities to catalyse redevelopment of employment lands and to increase public transport connectivity for new and existing land uses.

6. NEXT STEPS

Council invites Sydney Metro to work with Council and relevant State agencies to reconsider the location of an intermediate station between Parramatta CBD and Sydney Olympic Park. Council asks to participate in a transparent and rigorous evaluation of both the constraints and opportunities in Rydalmere, Camellia and any other precincts.

To summarise and suggest next steps,

- Council continues to advocate for a Parramatta Intermediate as part of Sydney Metro West to serve growth in employment and dwellings between Parramatta and Olympic Park.
- Council prefers that this station be located in Camellia rather than Rydalmere and notes that a conclusive rationale for not locating in Camellia has not been established by Sydney Metro.
- Council requests that the maintenance and stabling facility currently planned for Clyde be relocated to a position, such as that occupied by Parramatta Light Rail for a similar facility, which has fewer social and environmental impacts.
- In the event that neither Camellia nor Rydalmere are selected for a station, Council acknowledges that benefits may accrue from alternate locations such as Rosehill, Silverwater and Newington, and requests to work with Sydney Metro to evaluate these alternatives

Council calls on Sydney Metro and relevant agencies of the State Government to work with Council and the community in an open and transparent process to evaluate the need for and possible location of a Parramatta Intermediate station as part of Sydney Metro West, and to consider alternate locations for the maintenance and stabling facility at Clyde, such as the stabling yards for Parramatta Light Rail.

Council looks forward to continuing to work closely and proactively with Sydney Metro as the project is further refined and considered by the NSW Government.