



20 October 2017

Department of Planning and Environment  
320 Pitt Street  
SYDNEY NSW 2000

Dear Sirs,

## **Parramatta Light Rail Environmental Impact Statement: Objection**

The Skin & Cancer Foundation Australia (**Foundation**) which is located at 7 Ashley Lane, Westmead (**Premises**) makes the following submission with respect to the public exhibition of the environmental impact statement for the Parramatta Light Rail project (**EIS**).

We submit that approval should not be granted or should be granted with robust conditions to mitigate the impacts on the operation of the health facility at the Premises. Those conditions should require such matters as:

1. A requirement to maintain practical not just legal access to the Premises;
2. Limitations on changes to the project that increase anticipated impacts relating to access and noise including changes to the construction timeframe;
3. Enabling of fast and efficient emergency vehicle access to the Premises during construction and operation;
4. Certain, not indicative and at the discretion of Transport for New South Wales (**TfNSW**), noise and vibration mitigation measures that are automatically triggered upon breaches of the noise management levels (**NMLs**). Similar commitments that apply to Westmead Hospital should apply to the Premises; and
5. Relocation of the substation given the sensitive medical equipment inside or adjoining the Premises and the cumulative noise impacts.

## **Background to the Foundation**

The Premises are owned by the Foundation which is a not-for-profit, DGR registered organisation which provides specialist treatment, education and research for a variety of skin disorders, skin cancers and melanomas. It is at the forefront of delivering healthy skin having being established in 1987 by 38 professional dermatologists. The Premises are fully certified under the National Safety and Quality Health Services Standards and are accredited as a day procedure centre. Surgical operations are carried out on a daily basis and approximately over 15,000 patients are seen each year at the Premises. The Premises are also used for training and education of dermatologists, research and clinical trials.

We submit that the broad range of sensitive uses conducted on the Premises has not been properly considered as part of the EIS.

## **Environmental Impact Statement**

We have summarised relevant extracts from the EIS and the concerns of the Foundation in column 3 of the table below.

EIS	Page	Foundation Submission
<p>Figure 5.2a, 5.3, 5.4.1.1, Figure 5.7</p> <p>The project description, alignment, stations and substations.</p> <p>The approval is intended to apply to the Precinct Boundary which is marked by an open ended yellow line. The project alignment is marked as indicative and subject to further refinement.</p>	5-26, 5-29, 5-34	<p>There is no certainty as to final stop design and alignment of roads. The Westmead terminus station has a critical interface with the Premises considering geographical distance and access required to the Premises via Hawkesbury Road. If any changes are permitted post approval, then certain criteria must be mandatory such as maintenance of practical vehicular access via Hawkesbury Road and Railway Parade in a manner that fits within the capacity of the road.</p> <p>Any approval should be more certain about the scope of the works and the boundary is too broad for an approval. We submit that such a broad boundary for the CSELR made assessment of compliance difficult with many different impacts resulting rather than predicted because of the vague boundaries.</p>
<p>Figure 6.2a</p> <p>Construction zone boundary</p>		<p>The Premises is edged by a construction zone boundary with its only road access also to be a fully encompassed within a construction zone. The Premises contain a day hospital and having Hawkesbury Road closed for construction will prevent practical access to the Premises.</p> <p>Any project approval conditions should ensure that practical not just legal access is provided and that time delays using altered access paths are not material.</p>
Figure 5.8	Page 5-4, 5-35	<p>The plans are indicative only. Any ability given to the proponent to change the design should have certain conditions not just those listed on page 5-4. Additional criteria that limits the changes that can be made by TfNSW should relate to adverse impacts to access to businesses by pedestrians and visitors by car, emergency access and noise.</p>
<p>5.8.1 Road network changes</p> <p>Right hand turn onto Hawkesbury Road from Queens Road to be removed</p>	5-57	<p>This has a significant impact on the Premises as it prevents easy access to the hospital precinct. Considering the day hospital and medical centre easy access to the hospital is required from the Premises.</p>
6.14.3 Hawkesbury Road changes	6-31	<p>The Foundation seeks assurance that two way traffic will remain available at all times between Hawkesbury Road and Railway Parade. This is not assured by the vague and indicative nature of the plans and project descriptions in the EIS.</p> <p>Further assurance is sought on this issue considering regular bottlenecks of traffic on the railway bridge.</p>
11.3.2	11-12	<p>There is no comfort that access can be obtained from Darcy Road via Railway Parade during construction. Access seems to have to go via Queen's Road which would not cope well with the additional traffic. Emergency access would be</p>

direction along Hawkesbury Road.		<p>hampered. Any approval should require two way access along Hawkesbury Road at all times.</p> <p>Ashley Lane is often at capacity and during peak periods it can take 45 minutes to drive from the carpark on the Premises to Hawkesbury Road via Queen's Road.</p>
<b>Technical Paper 2 – GTA Consultants Construction Traffic and Transport Impact Assessment Report</b>		
<p>Construction compounds are proposed at the substation location and there are 20 indicative compounds</p> <p>Worksite boundaries will be developed as the project proceeds within the EIS precinct.</p> <p>Indicative construction compound location on corner of Railway Parade and "Haworth" [sic?] of Westmead Railway station.</p>	<p>6</p> <p>11</p> <p>41</p>	<p>A compound should not be located on the substation location given the narrowness of Ashley Lane and that it provides the sole access to the Premises for staff and patients.</p> <p>The compound locations should be more narrowly scoped. It is apparent when observing the CSELR project that more compounds than anticipated have been built with the impacts not assessed and the project running much longer than anticipated.</p> <p>The scope of the EIS precinct is too broad and the worksite locations should be specified rather than determined by a subsequent TMP. The diagram on page 41 and 42 does not clearly show the construction compound location on Railway Parade and so the impact cannot be properly assessed.</p>
<p>Construction period of 3.5 years</p> <p>Significant demolition and services work required in the Westmead terminus with estimated 30 months construction including 10 months of road and demolition work prior.</p>	<p>8</p> <p>40</p>	<p>The construction period is indicative only and the contractor can extend the period. The CSELR has taken much longer than anticipated.</p> <p>A contingency should be built in and the impacts assessed with appropriate mitigatory conditions of approval if the 3.5 year period is extended. If the time period is extended, then additional mitigation measures should be imposed.</p> <p>This is particularly a concern considering the traffic impact predictions on page 26 relating to Hawkesbury Road.</p>
Construction hours – Monday to Friday with road works to avoid AM and PM peak and focus on Saturday	8	The Foundation would prefer noisy activities 7am to 9am, late in the afternoon and on Saturdays.
Haulage routes	10	These routes are not identified and so the impact cannot be assessed. Hawkesbury Road is a main thoroughfare for patients and for emergency access between the ambulance station and the Premises.

<p>Midblock road access. Diversions from Hawkesbury Road to Park Ave, Queens Road and Hainsworth St. Darcy Road westbound would be impacted. Further delays would be experienced at the intersection of Hawkesbury Road and Darcy Road.</p> <p>Emergency management Plan to be prepared</p> <p>Local access allowed</p>	<p>12</p> <p>26, 31-32</p> <p>36-37</p> <p>44</p>	<p>It is insufficient to say that access will be maintained. That access must be practical and suitable for emergency vehicles considering ambulances will have to use Hawkesbury Road and Railway Parade.</p> <p>The proposed diversions from Hawkesbury Road to Park Ave, Queens Road and Hainsworth St do not provide access to the Premises. There is no plan for a diversion so far as it relates to the Premises nor comfort as to how traffic will be diverted in a manner that suits the capacity of the road.</p> <p>Darcy Road is the road from which ambulances would drive to the Premises and it is noted that this road and intersection capacity will be impacted during construction. The proponent should design an emergency access protocol.</p> <p>The Emergency Management Plan proposed by the proponent only relates to its construction emergencies and to the hospital. It does not cover the Premises.</p> <p>It is not certain that local access would be allowed considering current access is via 7 Ashley Lane not directly from Hawkesbury Road. TfNSW should confirm that vehicular access will be maintained via Hawkesbury Road, Railway Parade and Ashley Lane.</p>
Road approvals and TMPs	14	Approval of such plans should require mandatory consultation with businesses whose access is affected.
Property access - During construction diversions would be required and travel times may increase. Specific TMPs to be prepared in consultation with community and stakeholders.	35	Conditions requiring TMPs should specifically set objective criteria that has to be met to ensure the conditions of the approval are final and certain and the impacts mitigated.
<b>Operational Traffic – technical paper</b>		
The signalised Railway Parade intersection would remain and that Railway Parade would remain an important road for access to land east of Hawkesbury Road	18-19	The Foundation seeks confirmation that a right hand turn from Hawkesbury Road to Railway Parade will be maintained.

Railway parade traffic will increase because of drivers avoiding Hawkesbury Road. Footpaths would be maintained on both sides of Hawkesbury Road	20	The Foundation seeks confirmation that a right hand turn from Hawkesbury Road to Railway Parade will be maintained.
Access route from Ashley Lane	Figure 3.7	It is difficult to see on the figure if a left turn from Queens Road into Hawkesbury Road and then a right into Darcy Road will be permitted. This is the main likely access departure route and its availability should be confirmed.
Operational impacts to be managed as part of future design	152	<p>A large component of the operational impacts are being deferred to future design. These impacts must be assessed as part of the current EIS.</p> <p>Parramatta Park, Cumberland Hospital grounds, the gaol, the river, the Westmead hospital, coca cola's premises and the new bus T-way all form a continuous barrier that prevents entry to the precinct from the east and the north and herds all the traffic into two inlet points – the bridge at the park and Hawkesbury and Darcy/Briens road. This has not been considered in the traffic assessment.</p>
<b>Construction and Operational Noise – Technical Paper</b>		
It is predicted the Premises will be impacted by noise and vibration well above recommended noise management limits. The Premises receives extra impacts because it is the location of a station, substation (requiring demolition) and compound.	57, 58	The works adding to the excessive noise should be diluted by relocating aspects of the works such as the substation.
The noise impacts duration is not time limited and are noted as indicative only. Rock breaking is expected to take 20 weeks and it is the highest noise generator.	64, 66	Any approval should place strict limits on the amount of time excessive noise can be generated. A noise management plan should specifically consider and monitor impacts on the Premises rather than leaving it to TfNSW to determine the locations (see condition B1 of CSELR approval)
Figure 10 is inaccurate in that it does not show the Premises as being highly noise affected when it is immediately adjacent to the station and substation and has sensitive uses such as a medical centre. The Premises is likely to receive greater than 35dBA noise above	69, 71, 128, 136, 137	<p>The Premises is highly noise affected and any conditions should reflect this including mandatory mitigatory actions if noise management levels continue to be exceeded.</p> <p>It is insufficient to say that further consultation and assessment of potential impacts would occur at a later stage of the project. This is unlawfully deferring impact assessment to a later date.</p>

background.  Likewise, page 137 fails to recognise the sensitive location of the Premises being used for a day hospital. The EIS only proposes further consultation and assessment with the Westmead Hospital.		
<p>The EIS notes feasible and reasonable mitigation measures will be adopted and generic mitigation measures with no assessment of how those measures make the impacts reasonable. Even for highly intrusive works &gt; 30dBA above background the only mitigation is a letter box drop and monitoring. Nothing more is proposed.</p> <p>The sensitive use of the Premises is not considered in the mitigation response.</p>	131-136, 139, 226, 227	<p>The likely reduction in noise impacts from implementation of these measures needs to be assessed to determine whether the impacts are acceptable. Specific conditions should be imposed requiring certain mitigatory action not general conditions. Table 50 is too generic and the conditions should state the specific measures required to avoid the community having to references 1,000 + pages of EIS. More than notification and monitoring is required for a medical centre and day hospital where the impacts are greater than 20dBA above background.</p> <p>There is sensitive medical equipment in the Premises and these should be considered not just for the Westmead research zone (see page 227).</p> <p>Similar conditions that apply to Westmead Hospital should apply to the Premises during construction and operation.</p>
Ground borne noise.	142-143, 150-153	<p>The Premises contains medical equipment and undertakes day hospital procedures. The Premises is not considered and rather the focus is on the Westmead hospital precinct.</p> <p>Specific controls should be in place for the Premises similar to the other business listed on page 150. Any condition of approval should specifically identify the Premises as a property to be monitored for vibration and ground borne noise with an automatic trigger for mitigation measures if NMLs are exceeded. The mitigation measures should be known now and not be subject to "consultation".</p>
Noise levels during operation of the light rail will be above recommended levels. The mitigation strategy is vague and does not commit to reducing the noise to management levels	169-189	TfNSW should be required to comply with the management level or adopt mitigatory measures to comply eg by installing glazing or noise barriers.

Noise impacts will be compounded by the substation location immediately adjacent to the Premises. The assessment treats the premises as commercial not as a sensitive medical use and so concludes the noise management level is met when it isn't.	214-215	<p>The assessment ignores the medical/sensitive use of the Premises and adopts a commercial or residential criteria only.</p> <p>Specific conditions should be imposed requiring the noise from the substation to meet an amenity criteria appropriate to its sensitive use.</p>
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Yours faithfully



**Skin & Cancer Foundation Australia**  
Dhanraj Mehta  
Secretary/CFO