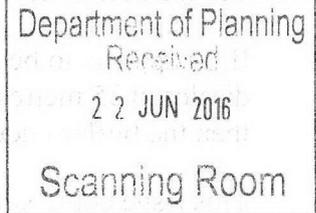


PCU065829

38 Thomas Wilkinson Avenue
Dural NSW 2158

Director
Transport Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001



17 June 2016

Dear Director,

CHATSWOOD-SYDENHAM METRO: SS15 7400 (the Proposal)

- 1 I am the owner of apartment located at 3/20 Dalgety Road, Millers Point. The Owners Corporation represents the Owners of the 65 apartments and 2 retail outlets on land bounded by Towns Place, Dalgety Road and Hickson Road Millers Point.
- 2 It is my understanding that the Owners Corporation has not made any political donations (reportable or otherwise) in the last two years.
- 3 The Owners Corporation has a number of objections to the implementation of the Proposal, the most serious relating to noise and vibration issues adversely impacting residents and businesses, and to the due process available to objectors which impacts on the nature and detail of those objections.

Substantive Objections

Position of Tunnels

- 4 It appears from the current plans/ diagrams that the eastern tunnel may pass beneath, or very close to, the north western corner of the Dalgety Road building of the Owners Corporation at a (stated) depth of 35 metres. Given that the EIS Summary notes that the current plans / diagrams are indicative only (as well as containing a 30 metre tolerance for the tunnels' final position), this objection is based on the assumption that it is intended that the tunnel is in fact due to be located in the position described.
- 5 The tunnel described continues south below Dalgety Road and continues to the new proposed metro station at Barangaroo. The tunnel also passes below Dalgety Road and, in part, passes beneath terraces on Dalgety Road. Those terraces sit on a sandstone cliff situated approximately 10 metres above the Dalgety Road surface. That adds an additional 10 metres to the (claimed) 35 metre buffer between the tunnel and the surface for those properties. In contrast, the Towns Place residential tower not only lacks this 10 metre buffer, but also has a private and public car park down to a depth of approximately 20 metres below ground level, significantly reducing the buffer shown on the plan, and exacerbating noise and vibrations.

- 6 The technicians present at the explanatory meeting in respect of this part of the tunnel on 25 May 2016 were not aware that the Owners Corporation building had a 6 level carpark below ground to a depth of approximately 20 metres and that, if the tunnel depths were maintained at 35 metres, as indicated on the current plans / diagrams, the buffer between the eastern tunnel and the bottom level of the carpark would, at most, be only about 10 metres.
- 7 If, as appears to be the case, the actual depth of the top of the tunnel is less than the publicly disclosed 35 metres (due to rail gradient limits coming up to the Barangaroo metro station), then the buffer under Towns Place will be materially less than 10 metres.
- 8 This issue could simply be resolved by relocating the eastern side of the tunnel approximately 10 metres to the west of Dalgety Road so that no part of it runs close to or below the Towns Place building on Dalgety Road.
- 9 Moving the tunnel west is clearly within the 30 metre tolerance allowed for in the Proposal and places the tunnel below a much higher cliff face where noise and vibration will not impact on any surface building.
- 10 This solution / amendment to the Proposal would move the western tunnel slightly to the west. However, this would in no way adversely impact on the Dalgety Road terraces, as they have an existing tunnel below them and they sit on an additional 10 metres of sandstone above the 35 metre deep tunnel.

Removal of spoil

- 11 The Proposal indicates a suggested intention of removing spoil from the tunnel to a temporary site under the overhead bridges on Hickson Road, and then for re-removal to a final unidentified site elsewhere. The indicated timing of construction (and removal) is on a 24/7 basis, which is both superfluous and unreasonable. The spoil should just simply be removed from the area directly to its final destination, and this should not occur at night.
- 12 The EIS represented at the explanatory meeting on 25 May 2016 that the spoil may be removed from the area by barge. If that was to happen, it must only do so from the harbour side of the central Barangaroo site. To do so from any other local harbour location would again involve double handling, unwarranted and unreasonable noise and increase the number of truck movements in the area.

Noise / vibration abatement measures

- 13 The Proposal indicates that the Metro's tracks will be of steel, as will the wheels of the rolling stock. The reason expressed for this choice at the explanatory meeting on 25 May 2016 is that it needs to be consistent with other tracks/rolling stock in the system.
- 14 Best modern practice for this type of rapid transport system is for the rolling stock to have rubber wheels running on rubber tracks. This makes its operation virtually silent. This is evidenced by the Paris Metro and other lines in Montreal, Kobe and Mexico City.
- 15 Attenuation is proposed for other parts of the line but not between the harbour and Barangaroo metro station. Without resiling from the principal submission that 21st century best practice dictates a rubber wheel / track system be installed, all of this track should have high quality attenuation measures installed. Particularly that part from the harbour to Barangaroo metro station.

- 16 If the tunnel is moved as suggested above, the Owners Corporation will not press their objection to steel wheels / tracks, but does press its submission regarding attenuation of all of the track.

Due Process Objections

- 17 Objections to the Proposal were invited on 11 May 2016. We understand that there has been only limited public advertisement of the Proposal and only one 'information' public meeting for Barangaroo in relation to it. Given the complexity of the Proposal and the vast detail of it, it is unreasonable to allow such a short objection period¹. The time period allowed for objections is simply not feasible for objectors such as Owners Corporations who need considerable time to consider the implications of the Proposal, obtain legal and expert advice, and subsequently time to call meetings to consider that advice and the impacts of the Proposal. That cannot reasonably be achieved within 6 weeks.
- 18 Although the proposal is detailed in part, it is imprecise and simply inaccurate in crucial areas (for example, the exact position of the tunnels). A number of the plans and diagrams contained in the Proposal are internally inconsistent. Consequently, this impacts on the nature and precision of objections.
- 19 The Owners Corporation reserves its rights in respect of the lack of due process afforded to the Owners Corporation in implementing the Proposal. It also reserves its rights to supplement this submission with expert(s)' report(s) as received.

Conclusion

- 20 The Owners Corporation has made practical and reasonable suggestions to the implementation of the Proposal in the hope that their adoption will lead to the Proposal satisfying Sydney's transport needs without adversely impacting on those who live and work near the proposed metro line.

Yours faithfully



Brett Palmer

¹ We note that objections close on 27 June 2016.