



5 November 2012

Director
Infrastructure Projects
Planning and Infrastructure NSW
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Dear Sir/Madam

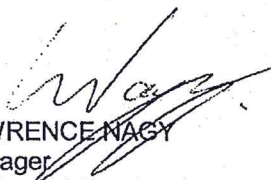
Epping to Thornleigh Third Track – Environmental Impact Statement – Hornsby Shire Council comments.

Thank you for the Department's letter (your reference 12/02801-1) received 18 September 2012 inviting Council comment on the Environmental impact Statement for the project.

Attached is a copy of Council's issues.

Council will appreciate acknowledgment of the submission and looks forward to the Department's response to the issues. If you require further information please feel free to contact me on 9847 6524.

Yours faithfully


LAWRENCE NAGY
Manager
Traffic and Road Safety
Infrastructure and Recreation

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EPHING TO THORNLEIGH THIRD TRACK PROJECT – Hornsby Shire Council Comments

The following specific concerns are raised about the impact of the proposal.

1.1	Station Design	The E/S identifies proposed minor works at Epping Station and more substantial changes to Pennant Hills, Beecroft and Cheltenham Stations. The following issues are raised: The proposed changes to Pennant Hills Station, as outlined within the E/S, include: • new pedestrian footbridge to the south of the existing bridge (to be demolished); and • extension of the existing elevated station concourse to the west including the provision of a new lift to Yarrara Road. Pennant Hills Station is located within the Pennant Hills Commercial Centre. The <i>Pennant Hills Development Control Plan (DCP)</i> applies to the Centre. The Masterplan contained in the DCP details landscaping along the Yarrara and Railway Street frontages of the Station. The Landscaping element of the DCP advises that street tree planting should reinforce the identity of the Commercial Centre. Accordingly, any proposed changes to the Station, including the new pedestrian footbridge should ensure that existing vegetation within the interchange is retained and that opportunity to provide supplementary/replacement planting within the immediate vicinity be investigated, particularly along Yarrara Street. In relation to Beecroft and Cheltenham Stations, it is noted that detailed architectural and landscape designs have not been provided as part of the E/S. Accordingly, detailed feedback cannot be provided. However, concerns regarding heritage are noted in Section 1.4 below.
1.2	Construction Noise and Vibration	The E/S identifies potential noise and vibration from the following sources: • airborne noise from construction traffic and works; • vibration from ground and construction works; and • operational noise and vibration. The E/S indicates that during preparation of the Construction Noise and Vibration Management Plan, the potential noise and vibration impacts of construction traffic would be further investigated. The following issues are raised: The E/S indicates that the proposal has the potential to impact on sensitive residential and non-residential receivers within the vicinity of the proposal. It is requested that the mitigation measures and protocols proposed within the E/S are strictly imposed and enforced, including preparation of a Construction Noise and Vibration Management Plan. It is recommended that the Transport for NSW establish a complaints handling team who can investigate complaints made by the public and quickly rectify any unreasonable noise and vibration issues. The contact details for the complaints hotline should be located on the Department's website and be similar to the system put in place by the Department for the M2 upgrade.

1.3	Visual Impact	The technical paper identifies the following key visual impacts (at a conceptual level) for the proposal: • vegetation clearing; • widening of cuttings and embankments; • construction of retaining walls; • new bridge structures; • new and altered station structures and car parks; • new rail infrastructure (such as track and overhead wiring); and • rehabilitated work sites. The following issues are raised: The suburbs of Beecroft and Cheltenham are characterised largely by low density residential development and remnant native vegetation. The suburbs also contain a large number of heritage listed properties and the Beecroft/Cheltenham Heritage Conservation Area (HCA). Visual impacts are anticipated to arise from the removal of trees and construction of structures associated with the third rail line. It is noted from the <i>EIS</i> that temporary construction compounds would be located in Epping, Cheltenham and Beecroft. It is also noted that the removal of vegetation would occur adjacent to the rail corridor in Epping, Cheltenham, Beecroft and Pennant Hills. The removal of existing vegetation would impact on the current landscape visual character of the corridor, resulting in the increased visibility of current railway infrastructure as well as providing reduced opportunities for the screening of future infrastructure works. This will have a significant impact on the visual character of the rail corridor and adjacent lands. Accordingly, the management and mitigation measures, as proposed in the <i>EIS</i>, should be imposed and enforced to mitigate the visual impact of the construction and operation. The measures should also include: • incorporation of architectural treatment and detailing of finishes within key elements of temporary structures that reflect the context within which the construction sites are located; • the provision of temporary landscaping/planter boxes, where appropriate, to soften views of the construction sites from adjoining sensitive areas; • provision of trees within the proposed commuter car parks at Cheltenham and Beecroft Stations to improve the landscape qualities, and soften views of the hard stand area; and • replacement planting including indigenous species and understorey vegetation, adjacent to the rail corridor following completion of construction works to assist in screening the railway and retaining the landscape setting. It is understood from the <i>EIS</i> that urban design and landscape plans would be developed in the future which would assist in the further analysis and identification of mitigation measures. It is imperative that Council has an opportunity to comment on these plans.
1.4	Heritage	An assessment of the impact of the proposal on heritage within the subject area is detailed within the <i>Historic Cultural Heritage Assessment</i> (Technical Paper) prepared by Artefact Heritage. The Technical Paper identifies relevant heritage items and Conservation Areas within 50m of the rail corridor. The Technical Paper includes an assessment of the impact of the proposed works on heritage items within the area. However, it does not address the

impact of the proposed works on the Beecroft/Cheltenham Heritage Conservation Area (HCA).

The EIS confirms that the proposal would potentially impact on heritage listed items identified under *Schedule D* of the *Hornsby Shire Local Environmental Plan 1994*, as follows:

- removal of trees from within the listed items, being railway land between Beecroft and Pennant Hills Stations (*Bushland*) and Wongala Crescent, Pennant Hills (*Bushland*);
- clearing of vegetation within the listed item, being Beecroft Road (*Bushland between Carlingford road and Kandy Avenue*);
- proposed extension of the pedestrian subway, the removal of part (or all) of the disused circa 1895 side platform, the extension of an existing station cutting and the removal of vegetation along the eastern side of the park, including two bunya pines of listed item – (*Beecroft Railway Station and garden*);
- views towards the rail line from a number of heritage listed dwellings, including property Nos. 44-56 The Crescent, Cheltenham; and
- location of the new bridge over the M2 Motorway approximately 5m from the listed item – Beecroft Road near southern end of Beecroft Road (*Stone causeway over Devils Creek*).

The following issues are raised:

Significant Bushland within HCA and Heritage Listed Items

The EIS states that the loss of vegetation to the bushland listed above would not have any impact or significant impact on the heritage items. The EIS also notes that the Statement of Significance for the Beecroft/Cheltenham HCA states that the dominant character of the area is derived from the tall tree canopy in pockets of remnant and regeneration forests in reserves, and generous gardens and their close relationship with the landforms and the pattern of roads and buildings within the landscape.

It is noted that as part of preliminary investigations, consideration was given to opportunities to minimise the impact on heritage items within the study area. This included construction of maintenance walkways rather than access roads. Notwithstanding, it is considered that the removal of remnant trees will have a significant adverse impact on the existing landscape qualities of the adjoining streetscapes and visual catchment and landscape qualities of the Beecroft/Cheltenham HCA. It is appropriate that opportunities should continue to be investigated to provide supplementary/replacement planting of trees within the immediate vicinity of the subject sites to mitigate the resultant visual impact. Consideration should also continue to be given to the investigation of alternate options that will reduce the scale of impact on the heritage listed items and HCA.

Beecroft Railway Station and Gardens

The EIS states that the removal of part (or all) of the disused side platform would have a minor impact on the heritage significance of the Beecroft Railway Station Group. The platform is referenced within the inventory sheet for the item. Accordingly, it is appropriate that archival recording of the former side platform should be undertaken and include photographic recording of the platform prior to and after removal of vegetation from the platform, and a survey of the platform. Copies of these documents should be provided to Council for its record.

The EIS also states that the removal of two of the six Bunya Pines from within the formal garden on the western side of the rail corridor would have a relatively minor impact on the overall heritage significance of the item. However, the Bunya Pines proposed to be removed are of considerable height and one of the dominant vegetation elements in the streetscape. The inventory sheet for the item states that the Bunya Pines are from the Federation period and form a distinctive visual element in the community precinct. Accordingly, their removal would have an adverse impact upon the overall visual setting and significance of the heritage item. Protective measures should be put in place to ensure the protection of the remaining Bunya Pines during

	construction. <i>Heritage Items - General</i> Overall, the management and mitigation measures recommended for the heritage items within the vicinity of the proposal, as outlined within the Technical Paper, should be imposed and enforced. The Technical Paper also provides recommendations for surveys and monitoring to be conducted in order to assess the possible vibration impacts of the proposal on susceptible heritage items within the vicinity of the rail corridor. <i>Cheltenham Station</i> The E/S includes an elevation and artist's impression of the proposed elevated over track pedestrian concourse. Proposed works also include a new car park constructed to the south of the existing car park. Final architectural and landscape details for the proposed works have not been prepared. The Director General Requirement's specify that "impacts to historic heritage (including archaeology, heritage items, conservation areas and natural areas)" should be addressed as part of the E/S. The Technical Paper provides an assessment of the impact of the proposed works on heritage items in the vicinity and acknowledges that the proposed demolition and reconstruction of Cheltenham Station would result in minor impacts on the views from several heritage items. Although the proposal has the potential to impact upon the visual presentation and significance of the HCA, the Technical Paper and E/S do not provide an assessment of the impact of either the demolition of the existing station or the construction of the proposed station on the HCA. To enable an assessment of the impact of the proposal on the HCA, the following information should be provided: • historical background information on the building and existing platforms; • an assessment of the quality and physical condition of the structure; • an assessment of the contributing nature of the existing structures in respect of the HCA; and • an assessment of the impact of the proposal on the identified significant heritage value of the HCA, including how the proposal will integrate with the area in respect of bulk, scale, architectural detailing/finishes and landscaping. Whilst it is acknowledged that the design of the station is dependent on the associated design requirements for disabled access and safe movement of pedestrians and trains, concern is raised regarding the bulk and scale of the proposed Cheltenham Station upgrade. The E/S does not provide details of alternative design solutions investigated to minimise the overall height of the structure. It is also acknowledged that infill development within Conservation Areas can consist of contemporary design and it is noted that the proposed station is clearly distinguished as a modern railway development. However, the design should still respond to the scale, form and detailing and established setting and character of the HCA. Face brick, sandstone, render or other treatments should be used on masonry surfaces at ground floor or foundation levels (i.e. the masonry columns) to complement the existing materials in the surrounding HCA. As described above, the vegetation within the streetscape of Cheltenham Station contributes to the existing character of the HCA and adjacent heritage listed houses. The avenue of mature vegetation along The Crescent should be retained or reinstated to obscure the impact of the modern building within the streetscape. The existing landscaped views and view corridors across the station to adjacent vegetation should also be retained. Due to the lack of information provided, including the absence of landscape plans, Council is unable to provide detail regarding the potential impact of the proposal at this stage. It is understood from the E/S that an urban design and landscape strategy would be developed during the detailed design
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	stage of the proposal. It is appropriate that Council and the community have an opportunity to comment on these strategies. Future consultation should include a section plan showing the height of the proposed station in relation to the Cheltenham Road overbridge, dwelling-houses and vegetation adjacent to the railway, including details of the height of the existing station.
1.5 Construction Traffic Access	The construction of the ETTT would mainly occur within the railway corridor. Access to work sites would be mainly at existing gated access points along the railway corridor. It is however understood that six (6) new access points will be created (i.e. Gate N1, N2, N3, N4, N5 & N6 as shown in Table 3.1 and Figure 3.1 of Technical Paper 4 – Part 1). The following issues are raised: The new constructions access points may require temporary parking restrictions to provide adequate sight distance. It is noted that in addition to the existing access point from The Crescent, three additional access points will be created in this vicinity. In order to minimise loss of kerb side parking and disruption to traffic, creation of new access points along the entire railway corridor should be minimised and consolidated where possible. A Construction Traffic Management Plans incorporating all construction access routes and construction vehicle and staff parking arrangements is required. Existing designated commuter parking at Cheltenham and Beecroft will be affected by the construction of the ETTT project. It is understood that at Beecroft Station approximately 20 car parking spaces in the western (Wongala Crescent) commuter car park will be affected. The following issues are raised: Whilst it is acknowledged that impacts will be minimised where possible by staging construction activities, the EIS does not provide details of the exact location and number of spaces that will be affected in the western (Wongala Crescent) commuter car park. There is a section of short term parking (2P) on Wongala Crescent required for visitors to local shops. Council requires access to these spaces to be maintained during construction. Due to the lack of information provided in the EIS Council is unable to provide specific comments regarding the potential impact to parking at this location. Details of <u>all</u> proposed changes and rearrangement of parking areas affected along the project corridor particularly on Wongala Crescent near Beecroft Station, Yarrara Road near Pennant Hills Station, The Crescent and Sutherland Road near Cheltenham Station should be provided to Council for comment. As a general principle, construction should be staged to minimise loss of all day and timed parking. Also, changes to the Wongala Crescent road reserve near Arden school must be minimised to ensure parking is not reduced. While construction of the ETTT would mainly occur within the railway corridor, it would however also require construction vehicles to use local roads which may result in changes in local road network operating conditions. The following issues are raised: The reconfiguration of Beecroft commuter car park will require changes to vehicle access however details are not available at this stage. The driveway layout needs to ensure that the operation of the intersection of Wongala Crescent and Chapman Avenue is not effected. In order to minimise the cumulative traffic impacts and pedestrian disruptions, construction activities should be staged and access for vulnerable road users maintained. Construction Traffic Management Plans must be provided for all sites traffic and pedestrian impacts are envisaged. Council also requests that the corridor boundary and earthworks be amended to allow for a continuous cycleway linkage between Wongala Crescent Pennant Hills and Wongala Crescent Beecroft and Beecroft Village Green and The Crescent. Council has raised this issue with RailCorp previously.
1.6 Parking Impacts	
1.7 Road Impacts Network	

		who have deferred a decision pending this project.
1.8	Operational Noise	The issue of noise levels at the Scout Hall was not identified as a problem in the EIS Report. This issue needs to be reviewed and mitigation measures should be determined to reduce excessive noise levels experienced by people using the scout hall.
1.9	Parks and Landscapes	The proposal will affect parks and community space along the corridor. Especially affected will be Beecroft Village Green and the Beecroft Station Gardens. The children's playground at the Beecroft Station Gardens is a particularly highly valued community asset. Council requires assistance in relocating this facility to a new space agreed between Council, community and Transport NSW. Council also requires assistance in restoring the balance of the two public spaces in Beecroft and the public area to attractive, useful public spaces. On the west side of Thornleigh station is an area of public space with trees that will be affected by the project. Council recommends that this space be rehabilitated as part of the project. The impact of the works will involve the removal of existing trees and other vegetation within the rail corridor. Experience with other recent rail projects has found that the planting of replacement trees within the corridor is not supported due to conflicts with rail operations, risk and safety procedures. It is therefore necessary for further detailed plans to be developed in consultation with Council to address the visual impact of the proposal. The visual assessment (Technical Paper 3) identifies the need for a detailed urban design and landscaping strategy to resolve these matters and the visual impacts of the loss of vegetation along other portions of the corridor. It is important that this strategy is further developed in consultation with Council.
2.0	Biodiversity	The project proposes to remove 4 hectares of native vegetation including 2.3 hectares of Blue Gum High Forest, a Critically Endangered Ecological Community (approximately 5% of BGHF in HS LGA), and 0.7 hectares of Sydney Turpentine Ironbark Forest, an Endangered Ecological Community, both listed under the <i>NSW Threatened Species Conservation Act 1995</i>, and 1 hectare of Sydney Hinterland Transition Woodland. The proposal also requires removal of 8.6 hectares of non-native vegetation. The native and non-native vegetation also provide habitat for local fauna species, identified as containing 5.5 hectares of native foraging habitat and 6.6 hectares of non-native foraging habitat, including the removal of 9 hollow bearing trees. The proposal will also require the removal of 3 individuals of <i>Epacris purpurascens</i> var. <i>purpurascens</i>, a vulnerable species listed under the <i>NSW Threatened Species Conservation Act 1995</i>. There does not appear to be a discussion for the loss of the 3 <i>Epacris</i> plants. The proposed biodiversity offsets have identified three options: 1. Biobanking, 2. Land Acquisition, and 3. Monetary contribution for conservation. The preferred option chosen for offsetting is Biobanking. It is currently proposed to offset the loss of native vegetation through the purchasing of biobank credits from a site within The Hills Shire LGA (THSC). This is despite the fact that the impacts of the proposal are occurring within Hornsby Shire LGA. The biobank credits available at THSC site are attributed to the Sydney Turpentine Ironbark Forest vegetation community. The offsetting of impacts on 2.3 hectares of Blue Gum High Forest are also proposed to be offset through the purchase of STIF credits within THSC LGA. It is also noted that the offsets strategy states that the proponent is looking at a range of alternative offset strategies. These alternative strategies include offsetting within the HSC reserve system or the potential for property acquisition, with one property already identified for further investigation. It is also discussed in the strategy that a Construction Environment Management Plan (CEMP) is to be developed which will include Flora and Fauna Management guidelines and proposed rehabilitation details. It is discussed in the report that the edge effects of the development are likely to be insignificant, as are the extent of weed invasion. It is considered that due to the extremely linear shape of the project site that the edge effects from

		vegetation removal and disturbance are likely to be more extensive than that at a site with a lower edge to area ratio. These increased edge effects need to be considered in the rehabilitation plans in the CEMP. The Natural Resources Branch does not consider the offset measures in the Biodiversity Offset Strategy to be suitable and recommends the following for consideration: • The Biodiversity Offset Strategy should offset the loss of Blue Gum High Forest and Sydney Turpentine Ironbark Forest within Hornsby Shire LGA • The loss of 9 hollow bearing trees need to be offset through the provision of suitable replacement nesting hollows and boxes and other provisions for the loss of significant areas of habitat • Consideration for the loss of the <i>Epacris purpurascens</i> var. <i>purpurascens</i> needs to be included in any offset proposal or rehabilitation plans • If Biobanking is to be used as an offset the 'like for like' principle should be employed. If this can not occur then alternative solutions should be sought for offsetting the loss of Blue Gum High Forest • Alternate offsetting options to supplement any Biobanking should include investigation into property acquisition, potential sites to be discussed with HSC. Alternate offsetting should also include rehabilitation of Hornsby Shire Councils Blue Gum High Forest reserve system • The Construction Environment Management Plan needs to provide for the long-term rehabilitation and management of vegetation within the rail corridor due to increased edge effects, leading to increased weed incursion and increased fragmentation of habitat • The proposed mitigation measures should also include the need for appropriate Myrtle Rust and Phytophthora protocols during construction
2.1	Bus shelters	• The proposed widening at Pennant Hills appears to require the removal of the footpath on the eastern side of Yarrara Road. There is an Adshel bus shelter located on this footpath approximately 30 metres south of Ramsay Road. Council has a 15 year contractual relationship with Adshel regarding the provision of this shelter. • This bus shelter must be reinstated in a nearby location suitable to Adshel and Council at full cost to the project. I presume that both Adshel and Council will seek compensation for loss of earnings (\$1200 per annum or part thereof, not known for Adshel) during the period between removal of the bus shelter and reinstatement of the new shelter.
2.2	Beecroft Station	Council is disappointed that the funding and scope of the project does not allow for the upgrade of Beecroft station as a part of this work. This will mean that when the station is upgraded in the future the business community and passengers will again be inconvenienced by construction activity. Council urges the Minister to further consider the financial and other benefits of including an upgrade of Beecroft station as part of this project.