

Director – Transport Assessments
Department of Planning Industry & Environment
4 Parramatta Square,
12 Darcy Street
PARRAMATTA NSW 2150

13 December 2021

Dear Sir/Madam

RE: Sydney Metro West – Concept and Stage 1 (major civil construction between Westmead and The Bays) – Modification 2 Clyde stabling and maintenance facility (SSI-10038-Mod-2)

I refer to your request for comment on the exhibition of a Modification Request to the approval for Metro West Stage 1 (major civil construction between Westmead and The Bays).

Council understands the requested modification relates primarily to moving the Rosehill dive structure further north and east than previously indicated and realigning Kay and Unwin Streets in Clyde.

Due to the timing of the exhibition, after Council's last meeting of the 2017 to 2021 term, and before the results of the 2021 local government election are returned, this submission has been prepared by Council officers, with issues drawn from resolved positions of Council. The City of Parramatta Council (Council) is pleased to provide comment.

Council officers have prepared this advice in line with Council's resolved (13 July 2020) submission to the SSI for Sydney Metro West, Concept and Stage 1, in which Council identified the following relevant key issues:

- *Investigation of alternate locations for the storage and maintenance facility at Clyde, or as a minimum, replacement for the loss of recreational space;*
- *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).*

In addition to the above key issues, Council's submission to the SSI also recommended the following for the works in Clyde:

- *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*
- *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.*

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Council officers have considered the proposed modification and note that Council's preferred position remains that the dive structure be moved as far south as possible. The following comments on the proposal seek to address issues arising from the proposal to move the dive structure north and east but Council's position on the preferred location for the dive structure remains unchanged. If despite Council concerns the dive structure is moved the following issues should be taken into consideration:-

General comments

It is preferred that an elected Council consider a submission on exhibition of a modification to SSI approvals. Accordingly, modifications should not be exhibited during holiday periods, nor during local government elections. This modification should have been exhibited before the 2021 local government election, or after the summer holiday period in January 2022, so that an elected Council could consider the modification and resolve a position.

Council officers note that Section 8 (Justification and Conclusion) of the Modification Report is missing key details needed to weigh impacts versus expected benefits for all options and the preferred course of action. This includes a statement at page 51 indicating the modification would '...avoid the requirement for major works associated with diversion of a Sydney Water sewer and the related impacts to the community'. This section should clarify where the identified Sydney Water sewer could be diverted and the resulting impacts. At page 52, it is noted 'the re-alignment of Kay Street and Unwin Street would reduce the need to disturb potentially contaminated soils and provides a number of benefits including improved access, safety, potential damage to the structure and better value for money'. For the purpose of a comprehensive assessment, the report should provide a more detailed account of the rationale for modification.

Land Use Planning

The modification proposal should ensure integration with the broader Camellia Rosehill Place Strategy, currently being undertaken by the NSW Department of Planning, Industry and Environment, noting:

- the need to locate social infrastructure, such as schools, open space, recreation and community facilities, and for these to remain accessible, have amenity and avoid impacts such as views, noise and vibration.
- the need to provide connectivity, including road and active transport networks within and from the precinct.

Transport Planning

Where there are new crossings proposed, the modification proposal should specify that integrated active transport links opportunities will be considered. Specifically, for Kay and Unwin Streets, if the gradient on Kay Street is significant, Council recommends inclusion of a shared path for cyclists and pedestrians on the western side up to Unwin Street and provision for a footpath on eastern side of the street.

The new dive structure design should accommodate:

- Continued pedestrian access to Unwin Street and the Rosehill Racecourse, with attention to legible and DDA compliant access from the signalised pedestrian crossing of James Ruse Drive and Prospect St

- A regional scale walking and cycling path user path (as discussed by Council in its submission to the SSI) planned along the former T6 rail corridor a of minimum 5m width between Parramatta Road and the PLR ATL at Camellia.
- Realignment of Kay St and Unwin St should accommodate pedestrian and cyclist access to cross James Ruse Drive (such as the current provision through the underpass of James Ruse Drive and the M-4 on ramp connecting to the Transport for NSW Traffic Emergency Patrol Facility on the west side of James Ruse Drive). This connection is the only way for cyclists to connect between the M-4 cycleway and the shared path on the west side of James Ruse Drive. This connection should be maintained during construction and in final design.

Heritage Considerations

In accordance with the 'Australia ICOMOS Charter for Places of Cultural Significance' it is important to conserve cultural heritage significance and minimise impacts on heritage values and fabric. Considering this aspect and the statement of significance, Council's preferred option would be for Sydney Metro to retain the Rosehill Railway Footbridge in situ, maintain and care for historic objects which contribute to cultural heritage significance of the Rosehill Railway Station.

Council acknowledges that the proposed modification SSI-10038-Mod-2 requires the Footbridge to be dismantled and removed from its current location on the basis that its retention in situ would have an impact on the Sydney Metro West State Significant Infrastructure project.

If the bridge cannot remain in situ, Council supports consideration of the dismantling, salvaging and future relocation of the heritage asset. Council prefers that the bridge be redeployed as either part of Metro West works in Clyde, or, if this is not possible, as part of other Transport for NSW projects in Parramatta.

Specialist advice would need to be provided from a qualified heritage specialist during all phases of a proposed project from feasibility, planning stages of recording, dismantling, salvaging and storage (timeframe and location). A Statement of Heritage Impact (SOHI) to assess, minimise and prevent heritage impacts on the heritage item is required as part of the assessment and approval phase prior the commencement of the works. Additionally a detailed design and a conservation management plan (CMP) must be in place for return in situ or relocate the reconstructed and restored item including eventually reinstated missing features. The Conservation Management Plan must include future routine maintenance works to conserve heritage fabric in accordance with the HNSW 'Minimum Standards of Maintenance & Repair'.

The preparation of a Conservation Management Plan (CMP) should be developed in consultation with Council and must be submitted to Council's Group Manager DTSU and Heritage Advisor for heritage assessment and approval prior to the commencement of any work including the proposed change of use, proposed dismantling, identified storage facility and the proposed location and timeframe for the future reconstruction and reuse for the item of Local significance.

Flooding

Council notes that previous comments in its submission to the SSI relating to flood modelling in Clyde and the impact to existing flood conditions to adjoining properties based on the proposed filling and changes to ground surface levels and bridging over the existing natural creeks have still not been adequately addressed. Council further notes that Sydney Metro has engaged with Council officers concerning the issues and we will continue to consult until these concerns are resolved.

Please note: The comments below relating to the Clyde Stabling and Maintenance Facility Modification Report (Mod2) may be subject to change based on the final completion of the hydraulic flood model and the changes in response to council's previous comments.

Major concerns previously raised by Council include:

- Proposed extensive fill on flood plain and its impact on A'Becketts Creek, Duck Creek and surroundings
- The model and flood report showing minor impacts even though floodplain is proposed to fill extensively up to PMF level. The volume of food storage lost seems to be significant due to area of fill and height of fill. Hence, model and flood report to be peer reviewed. Electronic version of models to be provided to council for review.
- Converting natural creek into piped conveyance not a desirable outcome. Further it is not clear that blockage has been considered as per ARR 2019. Sensitivity with blockage is un-known.
- Defined overland flow path is not clear. It is critical as the subject site is proposed to be filled up to PMF Level. Safe overland flow paths need to be defined.
- Impacts on Council infrastructures including stormwater systems.

Comments regarding proposed modification:

The proposed modification flood report shows negligible impact on hydraulic conditions due to these proposed modifications compared to the previous application. In the previous design the hydraulic model results showed an increase of 80 mm to the upstream and downstream flood levels in Duck Creek at the Clyde maintenance facility in the PMF event. The new modifications show a further 10mm increase to these levels. The modifications also show a 10mm increase in flood levels at the south-western section of Rosehill Gardens Racecourse grounds in addition to the previous reported 40mm increase.

This increase in flood levels have been reported as being due to loss of floodplain storage by up to 10m encroachment into the Duck Creek floodplain due to the bridge approach embankment.

Council recommends that the proponent further investigate alternate solutions that do not result in adverse changes to flood levels or hydraulic conditions that are also environmentally acceptable and address the potential creek erosion issues.

Thank you for the opportunity to contribute to assessment of this Proposed Modification. Please contact Michael, Jollon, Transport Planning Manager (mjollon@cityofparramatta.nsw.gov.au, or 02 9806 5580), or me if you have any queries or wish to discuss.

Yours sincerely,



Robert Cologna
Group Manager – Strategic Land Use Planning