

2 December 2020

Mr Glenn Snow  
Director Transport Assessments  
Department of Planning, Industry & Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

Attn: Mr Daniel Gorgioski

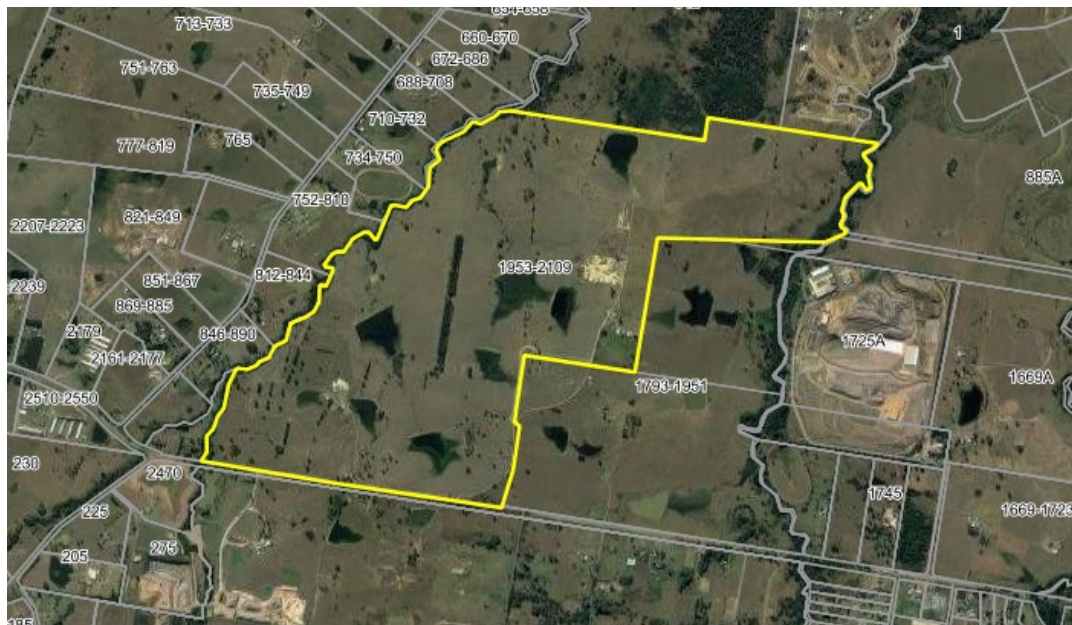
Dear Daniel,

## **SSI-10051 SYDNEY METRO - WESTERN SYDNEY AIRPORT | ENVIRONMENTAL IMPACT STATEMENT SUBMISSION**

This submission has been prepared by Urbis Pty Ltd (Urbis) on behalf of Roy Medich Properties Pty Ltd and CSPA Properties Pty Ltd (our clients) in response to the public exhibition of the Environmental Impact Statement for the Sydney Metro – Western Sydney Airport and its supporting documents.

Our clients are the owners of a 343.49-hectare landholding at 1953-2109 Elizabeth Drive, Badgerys Creek (the Site). The Site is located immediately north of Elizabeth Drive and opposite the Western Sydney International (Nancy-Bird Walton) Airport (WSA) and within the Northern Gateway precinct of the Western Sydney Aerotropolis (refer Figure 1).

Figure 1 – Site Plan Location



Our clients welcome the opportunity to comment on the Environmental Impact Statement (EIS) for SSI-10051 Sydney Metro – Western Sydney Airport (the project) and congratulates Sydney Metro, the Western Sydney Planning Partnership, the NSW Department of Planning, Industry & Environment (DPIE) and all levels of government on establishing such a significant milestone towards the delivery of the Sydney Metro, the biggest infrastructure project in Australia, and the future transport spine for Greater Western Sydney.

We have previously made submissions in relation to the proposed Western Sydney transport corridors (including the proposed rail corridor) and have highlighted the detrimental impact on the future development of our client's landholding. Our previous submissions also focused on the development potential that could be generated by a realignment of the rail corridor to facilitate a future station and the significant enhanced outcome this would have on the delivery of employment and economic growth within the Aerotropolis.

We have reviewed the exhibited EIS package in detail and have identified the following key concerns which relate to the design and delivery of the Sydney Metro and its impact on the site. The key points of our submission are outlined below and in more detail in the following sections:

- Station Locations and Proposed Alternatives - Activation of the Metro Corridor, noting that limited justification has been provided as to why the shortlisted 'North Elizabeth Drive' station was not considered in establishing the final station locations.
- The Metro Corridor reinforces the disconnect between infrastructure planning and spatial land use planning insofar that the Corridors SEPP has locked in corridor and the EIS is essentially justifying a route that fits that corridor - the consideration of any alternate options is therefore largely superficial.
- The provision of additional stations on the N-S route would provide significant land use planning benefits that would;
  - justify the decision for the high frequency, high capacity transport mode, over the long term,
  - offset the significant land take for transport corridors and environment zones, and
  - provide greater return on investment through the proposed Station Precinct SIC.
- Unacceptable fragmentation and sterilisation of a large englobo landholding by all proposed transport corridors including the proposed rail corridor; and
- Further details must be provided in relation to the detailed design including:
  - The actual levels of the surface rail line across the site and how the project will ensure that road access can be provided across the rail corridor as identified within the Aerotropolis Precinct Plan.
  - How these future crossing points can be provided in terms of the ability to ensure sufficient height and width for the expected freight vehicle traffic associated with the expected land uses for the site within the Aerotropolis Precinct Plan.
- The EIS must confirm any acquisition arrangements for the use of the construction footprint noting that this is inconsistent with the gazetted rail corridor.
- Further consideration and mitigation measures must be undertaken in relation to construction impacts in particular the cumulative impacts from construction traffic from all major infrastructure projects in the Aerotropolis.
- Details must be provided in relation to timing in particular when the proposed construction areas located on the landholding are required to be vacated.

## 1. SUBMISSION AND RECOMMENDATIONS

### 1.1 STATION LOCATIONS AND PROPOSED ALTERNATIVES - ACTIVATION OF THE METRO CORRIDOR

Chapter 6 of the EIS outlines the Project Development and Alternatives for the proposal including station precinct options for intermediate stations between the T1 Western Line and Western Sydney International.

As illustrated in Figure 2, the EIS identified an option for a station at North Elizabeth Drive located within our client's landholding. Despite this identification and a brief evaluation of shortlisted station options in Table 6-2, insufficient detail is provided within the EIS and accompanying documentation to support the evaluation and ultimately the justification as why this station location was not included. It is our view that providing only two stations between the Airport and St Mary's significantly undermines this significant city shaping opportunity for Western Sydney.

Figure 2 Station precinct options for intermediate stations



Figure 6-4 Station precinct options for intermediate stations between the T1 Western Line and Western Sydney International

Source: Sydney Metro, 2020

In our opinion, our client's site is ideally located and zoned to support an additional station. We note that the objectives for the Northern Gateway and the Enterprise Zone are focused on job creation and employment. Prohibited land uses on the site are limited to residential and other noise-sensitive land

uses. Despite the draft Precinct Plan identifying the site for major warehousing, distribution and manufacturing activities, there is no reason why higher order employment uses such as office park and campus style business park floor space and other airport serving land uses cannot be considered appropriate for this large, unfragmented landholding. The desire to explore these land uses on the site has been expressed in earlier submissions to the various planning documents exhibited by Government.

An additional station between Luddenham Road and the Airport Business Park would provide the following key benefits to the Metro line:

- Further justify the high frequency high capacity transport mode selected for the project and ensures that future jobs to be provided on the site will have access to a station. This is consistent with TfNSW guidelines which require mass transit networks to have walking catchment from the station of 800m, noting that the two closest stations to the site (Luddenham Road and Airport Business Park) are well beyond 800m from the site.
- Provides increased activation and development uplift along the corridor and catalyse the delivery of more employment floor space and jobs within the Northern Gateway precinct.
- Provides greater return on investment for Sydney Metro through more Enterprise Zoned land being included within a Station Precinct SIC area which allocates 36% of the SIC to support the cost of the project.
- Would allow for increased densities and compact urban forms around the new station to offset the significant amount land on the site zoned for environment and recreation zones which, in their current locations, would require significant re-alignment to facilitate an efficient site/road layout to support large-scale warehouse and manufacturing precinct.
- Would provide direct public transport access to the site that would attract wider range of airport serving land uses directly adjacent to the airport that generate significant jobs / customers but may not be suited to the airport business park (e.g. airline catering, crew training centres, hotels, long term car parks etc).
- Offsets the lack of any direct access to the future M12 motorway which would support the development of a logical and functional warehouse and logistics precinct.

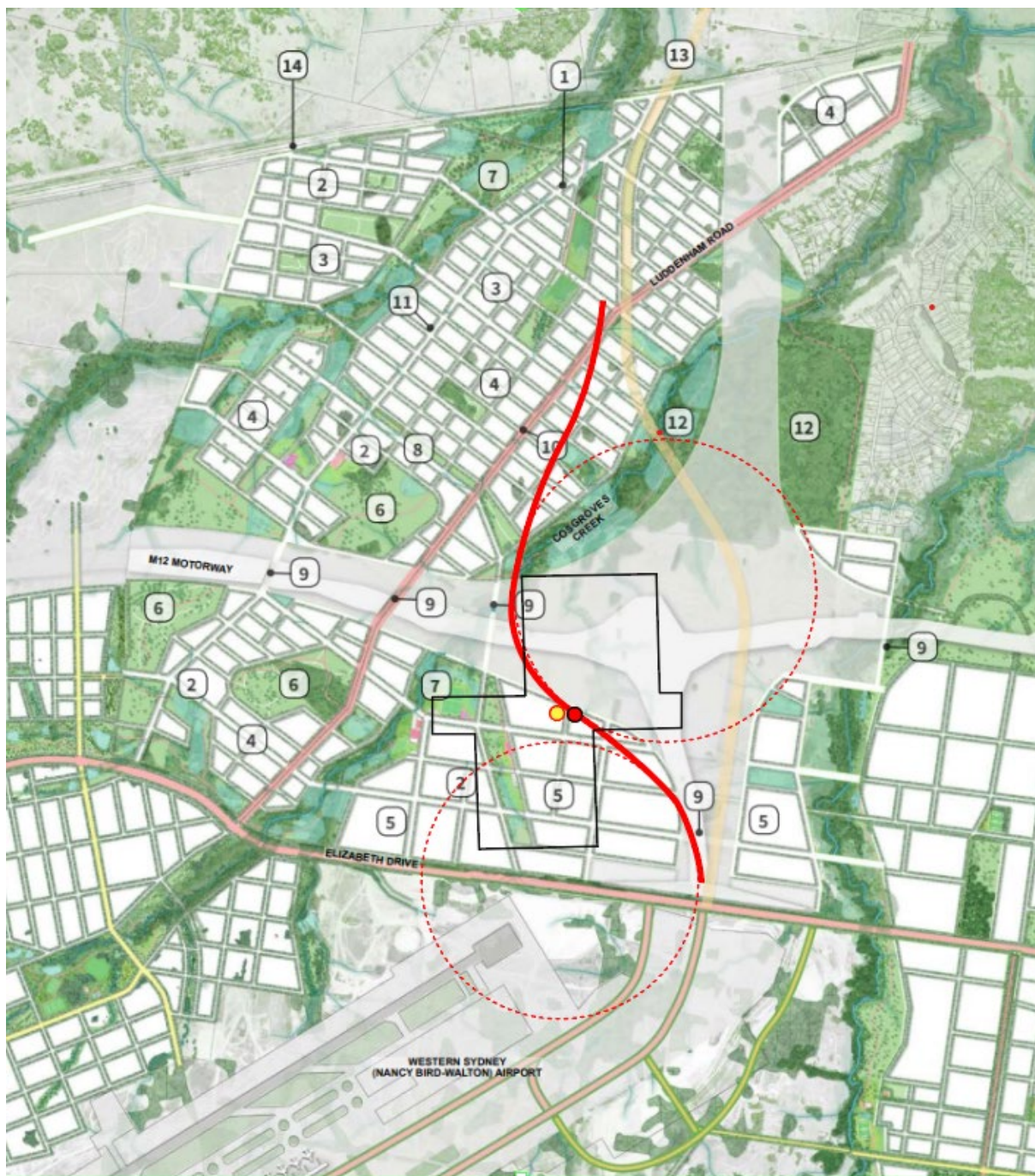
Previous submissions were made in relation to the landholding which included an investigation by Arup on how the rail corridor could potentially be re-aligned to facilitate a future station as illustrated in Figure 3 and 4. Arup's review found that:

*"depending on the operational characteristics of the chosen rail mode, that up to four viable alignments were available. Assuming the highest rail speed mode for urban commuter rail services, it was found that a station could be located within 400m of a notional town centre without compromising approach speeds or needing to close radii."*

The alternate alignment also illustrates how alignment can confluence with the current proposed alignment prior to reaching the proposed station at Luddenham Road.



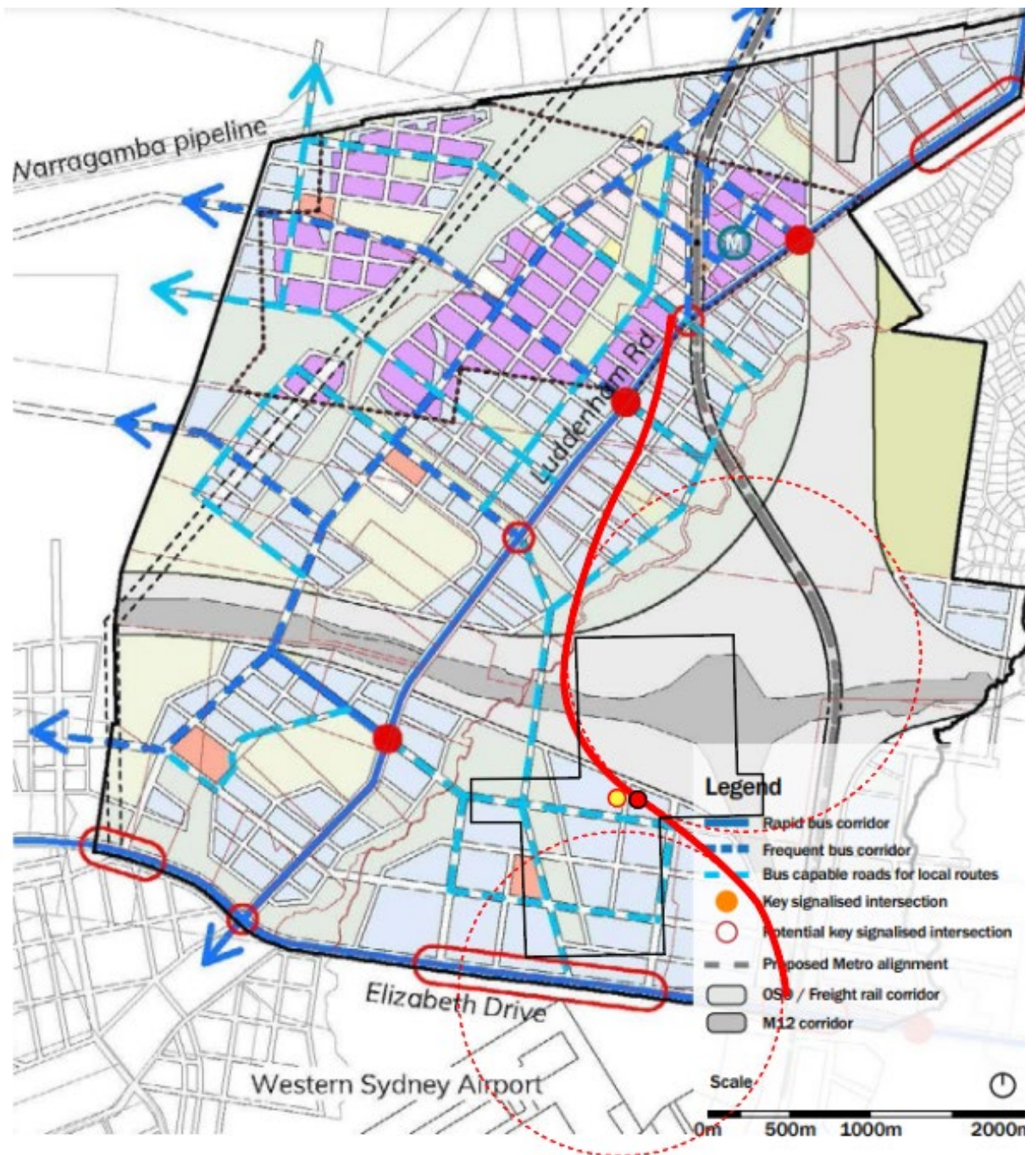
Figure 3 Arup Alternate Rail Alignment over Northern Gateway Precinct Plan (not to scale)



Source: Aerotropolis Precinct Plan



Figure 4 Arup Alternate Rail Alignment over Northern Gateway Transport Plan (not to scale)



Source: Aerotropolis Precinct Plan

It is our firm view that the future transport framework within the Northern Gateway Precinct Plan demonstrates how the significant areas devoted to proposed road corridors undermines any opportunity to activate the metro corridor in its current alignment. This plan clearly illustrates how logical land use planning and potential future activation of the metro corridor has been overlooked at the expense of future road corridors, which fragment the site and provide little or no benefit to this strategic landholding.

The proposed Metro provides a unique opportunity to shape land use planning within Western Sydney. The EIS clearly identifies potential locations for additional stations, however, provides minimal information within the report or supporting appendices as to why these additional locations were not included. Information must be provided by Sydney Metro to fully detail the criteria utilised to determine the final station location. This should be accompanied by a comparative business case which considers additional stations and their ability to catalyse higher order land uses and additional development contributions under the proposed Station Precinct SIC.

It is our view that additional stations, including one at North Elizabeth Drive, will be essential to support and justify the development of this high frequency, high capacity transport mode. Additional stations will provide significant opportunity for jobs and higher order land uses providing greater development uplift and in turn additional contributions under the proposed Station Precinct SIC. This would provide greater return on investment for Government and should strongly reconsidered before the detailed design is finalised.

## 1.2 FRAGMENTATION AND STERILISATION OF LAND

Chapter 6 of the EIS notes that significant planning was undertaken when assessing the most appropriate rail corridor route and station alignment. Whilst the route selected travels north and traverses the subject site, the impact of it doing so has resulted in a fragmentation and the sterilisation of some of the most strategically important land zoned within the Aerotropolis.

As noted in previous submissions, the proposed route is inconsistent with the objectives of the Greater Sydney Region Plan and the planning priorities within the Western City District Plan which notes:

*“In assessing potential infrastructure corridors, economic, social and environmental outcomes are considered as well as their integration with the long-term land use and transport vision for the area”. And*

*“Establishing the land use and transport structure to deliver a liveable, productive and sustainable Western Parkland City”*

Whilst the site is the only singular landholding large enough to accommodate both the proposed airport access road interchange and the parallel Metro corridor, the cost of proceeding with the route in its current form will further fragment the site.

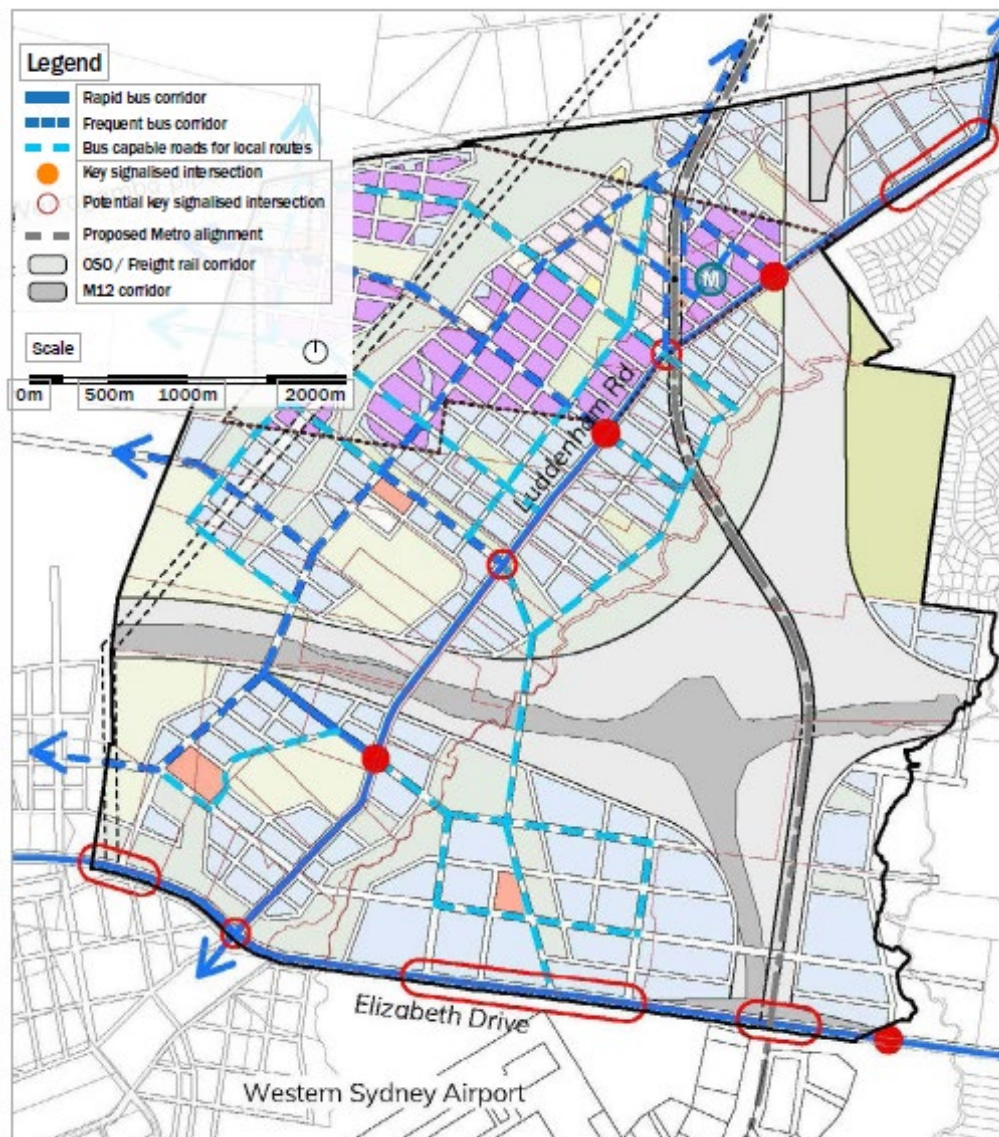
As per our submissions to the M12 Motorway and previous submission to the proposed transport corridors, the interchange between the primary east-west road corridor and north-south rail and road connections to the airport creates isolated pockets of land that will be difficult to develop in a sound and logical manner without any broad consideration of alternative access arrangements and alignments.

This impact of these initial road and rail corridors will be exacerbated once the M12 and rail corridors are combined with the future M9 Outer Sydney Orbital Corridor. When all future transport corridors are combined, it will sterilise over 107ha (as per the DPIE’s Draft Precinct Plan) of the site from future development whilst fragmenting the remaining severed portions of the site. These impacts are

unacceptable when considering these impacts could be easily offset through the provision of an additional station north of Elizabeth Drive as shortlisted in Chapter 6 of the EIS.

The fragmentation of land is further compounded by the lack of any detail around the levels of the surface rail line across the site and in particular the ability to ensure that any road access can be provided across the rail corridor as identified within the draft Precinct Plan (refer Figure 5). The design of the rail corridor must consider how these identified crossing points will ensure sufficient height and width to accommodate the expected freight vehicle traffic associated with the expected land uses for the site within the draft Precinct Plan.

Figure 5 Northern Gateway Precinct Plan – Transport Framework



Source: Western Sydney Planning Partnership, 2020



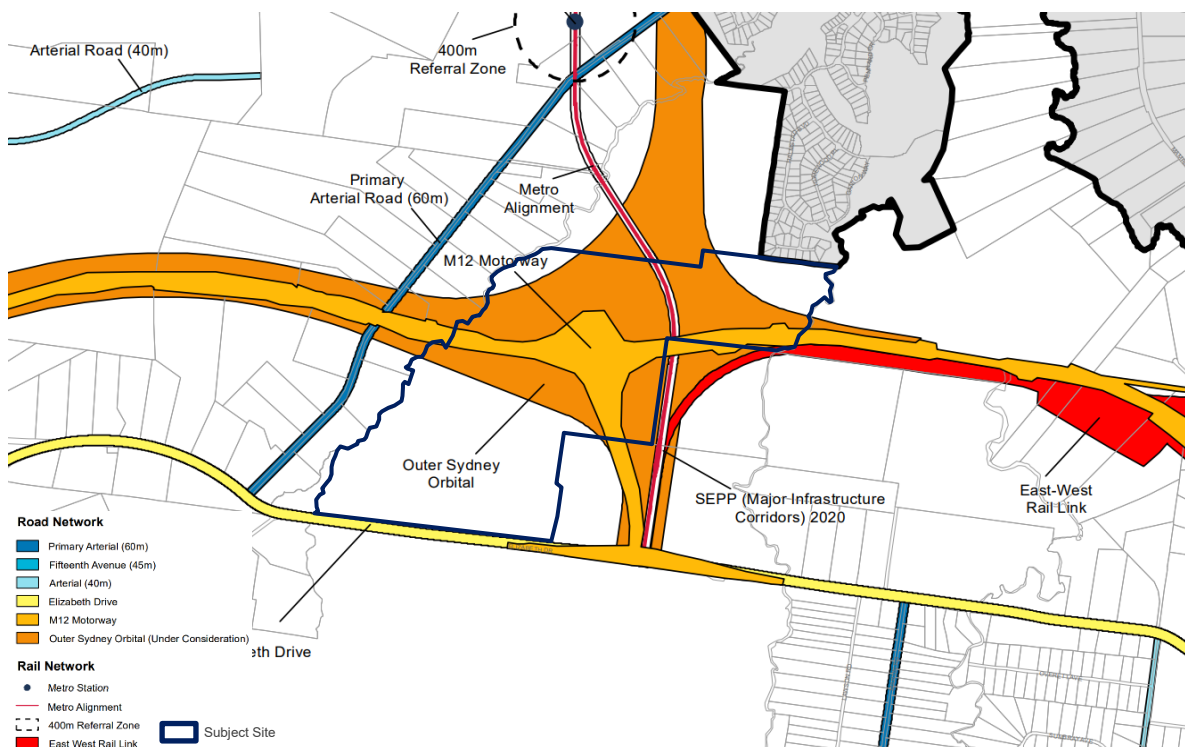
The current designation of transport corridors as under the *State Environmental Planning Policy (Western Sydney Aerotropolis) 2020 (Aerotropolis SEPP)* will impact the effective delivery of employment and strategic lands surrounding the Aerotropolis. The Aerotropolis concept and vision is a functional metropolitan area whose infrastructure, land use and economy are based off the success an international airport.

It is our view that the development of the Aerotropolis is significantly undermined by the fragmentation and sterilisation of large englobo landholdings by poorly designed and integrated transport corridors. The alignment of the rail corridor results in significant impacts to future land uses and has resulted in a sub-optimal draft precinct plan which undermines the overall orderly delivery of strategically significant land.

### 1.3 CUMULATIVE CONSTRUCTION IMPACTS

The EIS for both this project and SSI-9364, the M12 Motorway indicates that both infrastructure projects are to be constructed simultaneously. This will ensure completion prior to the airport opening in 2026. As illustrated in in Figure 5, the site is significantly impacted by the corridors for both major infrastructure projects.

Figure 6 Transport Corridors Map



Source: SEPP (Western Sydney Aerotropolis) 2020

As noted in Section 1.1 the proposed corridors have significantly impacted the site and its ability to deliver strategic and higher order land employment uses under the highly flexible Enterprise Zone. In addition, minimal detail has been provided within the respective projects (M12 and Metro) as to when the land will be required for construction. This lack of detail and landowner consultation significantly impacts the ability to master plan the site with any certainty.

The EIS for SSI-10051, highlights the significant cumulative construction impacts deriving from the construction of the Metro. The EIS identifies traffic impacts and in particular the temporary increase in construction vehicles on the local road network north of the WSA. The EIS specifically identifies that overlapping construction activities from the M12, WSA and Metro line will have detrimental impacts to the local road network.

In relation to these cumulative impacts, the EIS specifies that peak year of construction impacts for all of the above infrastructure projects is to occur concurrently in 2023/2024. When combined with private developer construction the level of works within the region, will inevitably result in significantly reduced performance of the road network.

We note that the Transport Assessment undertaken in Chapter 9 of the EIS assessed the AM and PM peak of the road networks performance for the peak year of construction (2023/2024) for all three projects simultaneously. The assessment indicated that all mid-block sections are forecast to operate with a similar level of service (**LoS**) in the peak year project construction scenario and cumulative scenario, with the exception of:

- Elizabeth Drive west of Badgerys Creek Road (westbound) which is expected to change from LoS D to E during the AM peak and from LoS E to F during the PM peak; and
- Elizabeth Drive east of Badgerys Creek Road (eastbound) which is expected to change from LoS E to F during the PM peak.

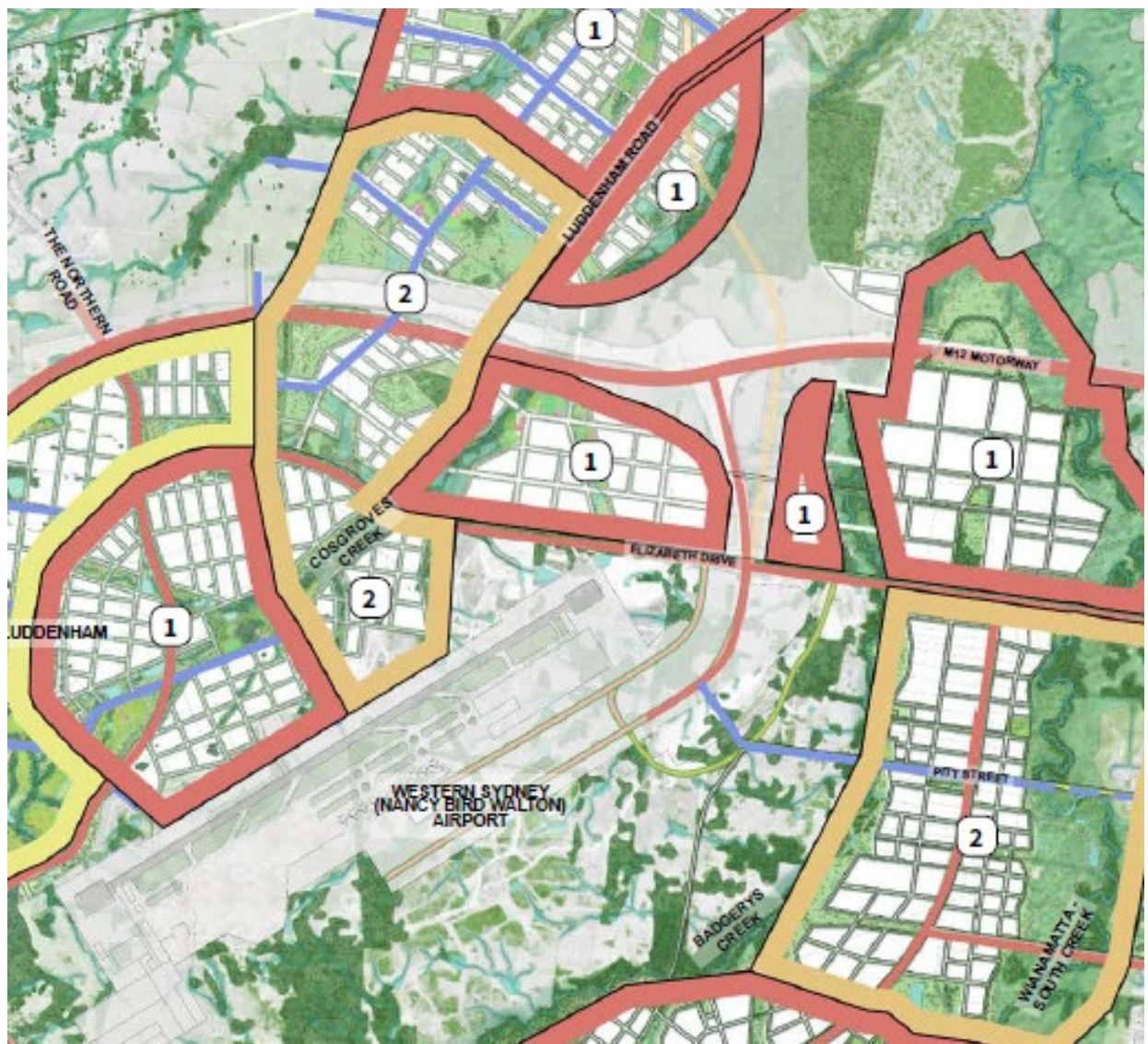
The result of this significant decrease in LoS for these key intersections will impact on the land and its ability to undertake construction and operation of a high-quality development precinct in line with the strategic vision of the Northern Gateway. Having the two worst performing intersections within the Aerotropolis bookending either side of the only road access to the site from Elizabeth Drive, will impact the ability to develop the land in a timely and orderly fashion.

As was noted within the various strategic plans for the Aerotropolis it is envisioned that strategic land uses, employment opportunities, and supporting infrastructure will be developed prior to the commencement of operation of the WSA in 2026. Given the significant level of development that is likely to take place simultaneously, it is imperative Sydney Metro consider adequate mitigation measures to ensure there is minimal impact as a result of construction to adjacent landholders.

Construction of the Metro and M12 will likely result in planned local and precinct road linkages not being able to be completed prior to the completion of these major projects. If a coordinated approach to connecting fragmented land is not undertaken it is likely that key development sites will remain severed and sterilised until these connections can be constructed. This will impact on the intended sequencing of the initial precincts identified within the draft precinct plan (refer Figure 6). This approach will likely delay the early activation of the Northern Gateway Precinct, which will in turn affect the economic productivity of the Aerotropolis and wider Western Sydney region and ultimately the return on investment for the proposed Metro.

Whilst several mitigation measures have been proposed to minimise the impact of the construction on neighbouring sites it is imperative that combined Construction Traffic Management Plan be developed in coordination with the M12 Motorway and WSA. This plan must consider all known private development projects within the initial precincts. This combined approach will ensure that the cumulative impacts of construction across the precinct is minimised. A combined approach will also ensure all surrounding land holdings are able to be developed in a manner that will benefit the wider Aerotropolis and deliver on the unprecedented level of strategic planning to ensure the success of the WSA, Aerotropolis and the Western Parklands City.

Figure 7 Aerotropolis Sequencing Plan



**Sequencing Plan**  
Western Sydney Aerotropolis

- First priority areas
- Second priority areas
- Third priority areas





## RECOMMENDED NEXT STEPS AND ACTIONS

Our clients appreciate the opportunity to make a submission in response to the public exhibition of the EIS and would welcome additional re-establishing dialogue with Sydney Metro in relation to the alignment and future station locations.

It is our strong view that the all proposed transport corridors including the rail corridor should be refined to minimise their potential impacts on the economic, social and environmental outcomes for the land, preserve the opportunity to unlock the development potential of a large single landholding within the Western Parkland City and enhance the delivery of the Objectives and Planning Priorities outlined within the *Greater Sydney Region Plan* and the *Western City District Plan*.

Our significant work to date, has demonstrated how alternate alignments can better align public need and benefit with private capital investment that will be so critical for Government to recoup as quickly as possible a return on its own investment through the proposed Station Precinct SIC.

Accordingly, we request that Sydney Metro and Transport for NSW reconsider the proposed transport corridor and review the decision to not proceed with a station at North Elizabeth Drive station which was detailed as a shortlisted station option in the publicly exhibited EIS.

We submit that the delivery of a station will catalyse higher order employment land uses to support the growth of the Western Sydney Airport Growth Area, the Western Economic Corridor, and the Greater Sydney Region.

Notwithstanding the above, should the additional station not be considered, the EIS must be amended to provide the detailed background studies and information to justify this decision. The EIS must also provide additional information to ensure that the cumulative construction impacts of all construction within the Aerotropolis and be appropriately mitigated and managed.

If you have any questions, please do not hesitate to contact either the undersigned or Mr Christophe Charkos of this office on (02) 8233 9900.

Kind regards,

A handwritten signature in black ink, appearing to read "David Hoy". The signature is stylized with a large, sweeping "D" and a long, trailing "y".

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