

Our Ref: 18-004-4
25 June 2020

*Lodged via Online submission:
Major Projects Planning Portal*

Dear Sir/Madam,

Ref. No. SSI-10038

**Submission on behalf of Harvey Norman
Sydney Metro West EIS**

Thank you for the opportunity to make a submission to the Sydney Metro West Environmental Impact Statement – Concept and Stage 1 (EIS). We appreciate and acknowledge the significant effort that has gone into the preparation of the EIS.

Knight Frank Town Planning has been engaged by Harvey Norman (Calardu Silverwater Pty Ltd) to prepare this submission in relation to their landholding at 75 Carnarvon Road, Silverwater (hereinafter as “the subject site”) – see **Figure 1**.

Silverwater has been considered as a station location, as detailed in chapter 3 of the EIS, but not shortlisted as a station location. In response, we submit the following support for a station location at Silverwater that warrants the subject site being investigated further.

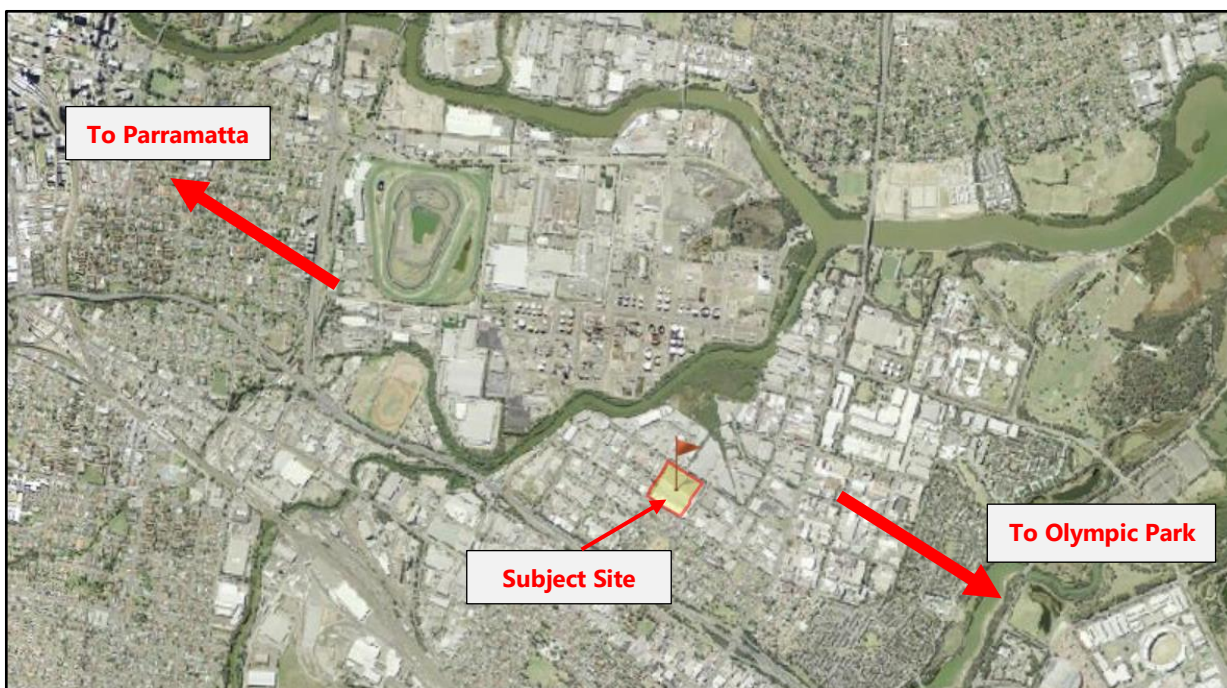


Figure 1: Site Context (Source: SixMaps)

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Strategic Location – Central to Sydney Olympic Park and Parramatta

As confirmed by the EIS, the following seven Sydney Metro West station locations have been shortlisted: The Bays Precinct, Five Dock, Burwood North, North Strathfield, Sydney Olympic Park, Parramatta and Westmead. As announced by Sydney Metro (30.04.2020), an investigation into a station at Rydalmere is not going ahead. Therefore, there will be no station along the lengthy route between Sydney Olympic Park and Parramatta to service this population and workers. Silverwater is ideally placed approximately midway between Sydney Olympic Park and Parramatta, making it the optimal location for a new station.

The long distance between Parramatta and Olympic Park stations, has otherwise already been acknowledged by the EIS noting that Silverwater has been identified as a location for a Metro services facility – **See Figure 2**. The EIS confirms the long distance between Parramatta and Olympic Park as follows: “...*additional facilities would be required where there are **longer distances between stations**. Based on the current design two services facilities are required between Parramatta and Sydney Olympic Park*” (Section 3.7.5).

Furthermore, the confirmed transport corridor as detailed in the Metro West infrastructure SEPP, passes through the northern section of the Harvey Norman landholding – **See Figure 3**. The location of the Harvey Norman landholding over and adjacent to the corridor and its location almost mid-way between the proposed Parramatta and the Sydney Olympic Park stations confirms the conclusions of prior submissions made on behalf of Harvey Norman, that that their Silverwater holding is a highly suitable location for a station.

The suitability of this landholding for a station is even more so evident when considering the changed circumstances since the original assessment of station locations. Those changed circumstances are:

- The decision to now not proceed with Rydalmere and therefore no station between Sydney Olympic Park and Parramatta.
- The changed emphasis on the future of employment lands and how best utilised following recent COVID 19 impacts to the economy.

At the very least both are major changes or disruptions to the assumptions about a station at Silverwater. At a minimum, we recommend that this justifies and warrants a review of a station at Silverwater and that more particularly, the Harvey Norman holding be further investigated as a ‘potential strategic station’.

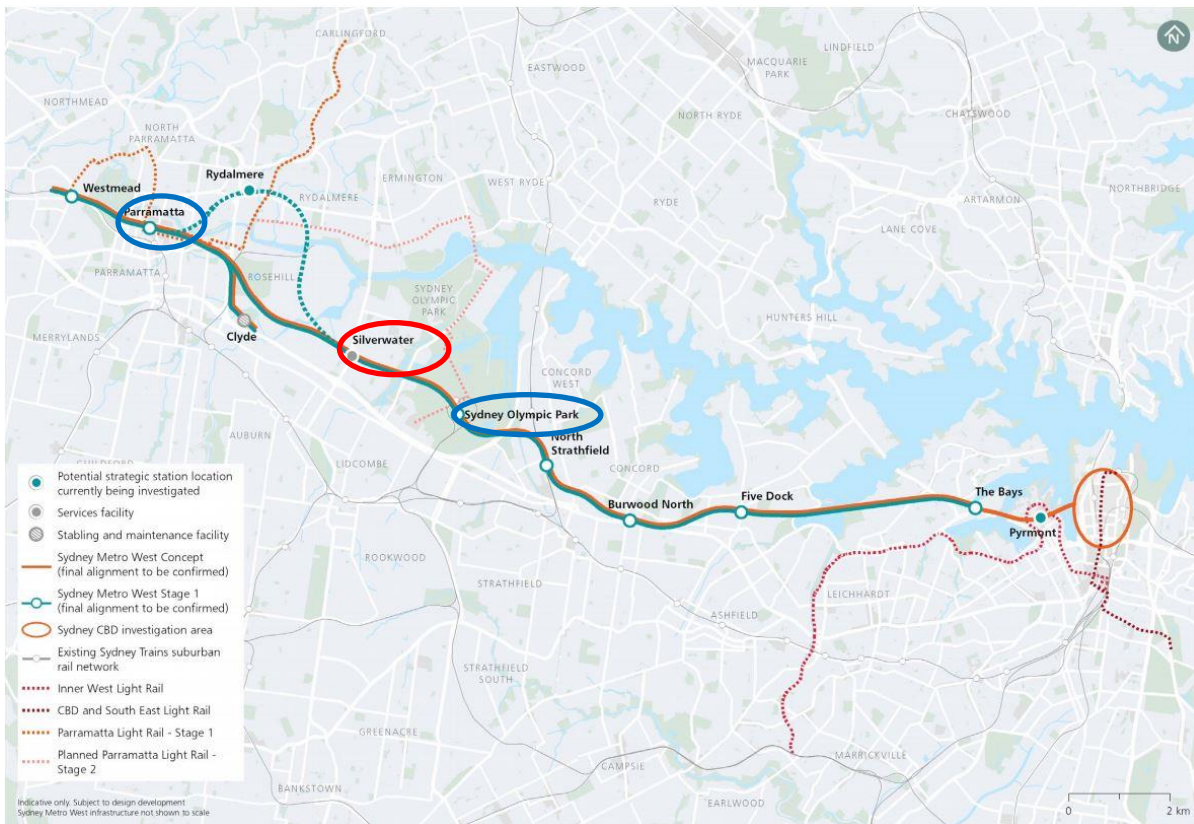


Figure 2: Silverwater centrally placed between SOP and Parramatta (Source: Sydney Metro West)

Silverwater as a Station Location - Evaluation Criteria

In response to EIS evaluation criteria for station location options, we provide the following support for Silverwater to be further investigated as a 'potential strategic station':

Evaluation Criteria	Why Silverwater?
Customer Benefits	<ul style="list-style-type: none"> • A metro station will consolidate the role of Silverwater as an employment node. • There is the opportunity to provide the type of jobs and learning opportunities specific to the needs of Western Sydney.
Strategic Land Use and Transport Alignment	<ul style="list-style-type: none"> • The subject site is centrally located between Sydney Olympic Park and Parramatta, making it the optimal location for an additional station. • The EIS states that: <i>"Silverwater was not taken forward for further investigation - would impact on the viability of the remaining land use and businesses in the localities"</i>, and that <i>"a station in this locality would not align with the Government's current strategic land use vision to retain essential urban services in this area (Greater Sydney Commission, 2016)"</i>. Notwithstanding the above,

	<p>we would suggest that circumstances have since changed, warranting a reconsideration of Silverwater for the following reasons:</p> <ul style="list-style-type: none"> • Government's overall strategic vision, for Silverwater, to be an area of "Essential Urban Services, Advanced Technology and Knowledge Sectors" (GSC) can be achieved in the precinct through a new integrated approach with other uses such as residential and education. In other words, it is possible to retain a diverse mix of jobs that are aligned with the Government's own vision for Silverwater. • Directly opposite the subject site, on the south side of Carnarvon Street, is an already well established residential neighbourhood with a mix of cottages and multi-unit housing. Accordingly, the character of the precinct can already be described as mixed use with both residential and commercial uses. • The absence of any Metro station between Parramatta and Sydney Olympic Park is a significant distance that is capable of accommodating a station. It is understood that the locating of a station at Silverwater would meet if not exceed the minimum requirements for distances between stations on the Metro network. • The locating of a station at Silverwater will be the catalyst for a significant increase in jobs both during construction and ongoing in the GPOP. It will consolidate the role of Silverwater as a major metropolitan location for jobs both as traditional urban services and its transformation to new the generation of as acknowledged by the Government's own vision for Silverwater. • Alignment with the Government's vision for Silverwater which includes 'Advanced Technology and Knowledge Sectors'. The term 'urban services' is used to describe a wide range of industries. The GSC's definition of industrial and urban service activity types (Refer to table 5 of the District Plan) includes 'new economy and creative uses'.
Productivity & Jobs	<ul style="list-style-type: none"> • A higher density and diversity of employment uses can still be achieved in a planned mixed-use setting. Achieving a higher density of employment that retains urban services on site, is entirely consistent with Government's aim for the future of Silverwater. • The subject site is of a scale suitable to provide for an expanded range of uses to build upon existing urban services in the area. • In the post-COVID 19 economy, many assumptions around where and how people work will be challenged. Again at the very least, this justifies a rethink about the future role of Silverwater. • Silverwater as an employment area can be retained and enhanced through the improved accessibility and amenity possible through the urban renewal of Silverwater.
Housing Supply	<ul style="list-style-type: none"> • Directly opposite the subject site, on the south side of Carnarvon Street, is an already well established residential neighbourhood. Accordingly, the character of the precinct can already be described as mixed use with both residential and commercial uses. A blanket exclusionary approach to new

	<p>housing development in Silverwater is therefore not appropriate given the existing land uses in the area.</p> <ul style="list-style-type: none"> The site is suitably placed and of an appropriate scale to provide a new metro station and increased residential supply, including affordable housing.
Urban Renewal & Placemaking	<ul style="list-style-type: none"> The size of the subject site, at 4 hectares, and the general larger size of the other existing holdings on the northern side of Carnarvon Street will support urban renewal at a scale suited to an integrated place-based approach. The subject site and wider precinct have potential to provide a new form of a mixed use place, providing an expansion of employment, education, and housing. The locating of a Metro station at the subject site has the opportunity to act as a catalyst for the urban renewal of Silverwater. The subject site is renewal ready, with no known barriers to development, and is largely unconstrained (e.g. flooding, heritage and contamination).
Transport Integration	<ul style="list-style-type: none"> The subject site is located on Carnarvon Road in Silverwater. The Carnarvon Road Corridor extends along Carnarvon Road from Silverwater Road to Duck Creek. Carnarvon Street has been identified as the preferred location for the Duck Creek bridge crossing connecting Silverwater to Camellia; the light rail and to Parramatta, making this a strategic corridor Camellia Precinct Land Use and Infrastructure Strategy (DPIE, July 2015). The Corridor is unlike the majority of Silverwater and accordingly, warrants a different planning response. That planning response is much more about a mix of uses, commercial, employment and residential. A mixed-use Corridor reflects the following unique attributes of the area. Carnarvon Street has the potential to be a transit corridor of higher density development that supports the routing of public transport, unlocking the employment and mixed-use potential of the area.
Deliverability & Value for Money	<ul style="list-style-type: none"> The landowner of the subject site has the capacity and capability to collaborate with government to deliver a metro station. The confirmed metro corridor passes through the northern section of the Harvey Norman landholding – See Figure 3. The locating of a station at the subject site would provide ROI for government, without the need to amend the rail corridor alignment, providing an efficient addition to the already shortlisted metro station route without adding significant additional time to the journey between Parramatta and the Sydney CBD.

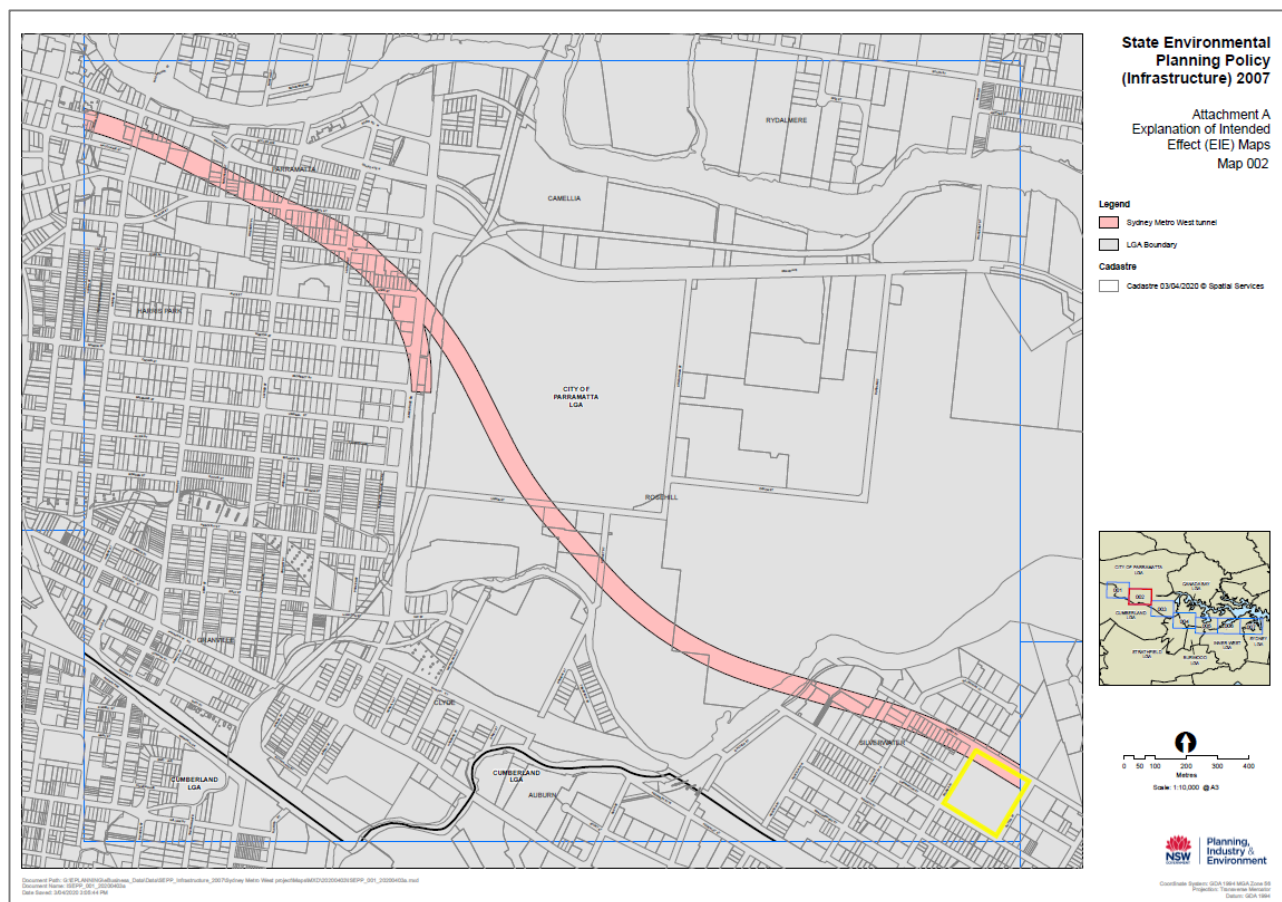


Figure 3: Sydney Metro West Tunnel Map with Harvey Norman landholding outlined in yellow
(Source: Sydney Metro West)

In considering the above attributes of the site and the changed assumptions since the original decisions on where to locate the Metro stations, it is reasonable and appropriate to conclude that this is a unique site suitable for the only Metro station between Sydney Olympic Park and Parramatta. Accordingly, and on behalf of Harvey Norman, we recommend the subject site in Silverwater be further investigated as a station location.

We thank the Department of Planning, Industry and Environment for the opportunity to make a submission on the Draft EIS and look forward to the opportunity to discuss further.

Yours sincerely,



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