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Planning and Assessment
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(Submitted electronically via NSW Planning Portal)

To whom it may concern,

ATC SUBMISSION: (SSI-10038) SYDNEY METRO WEST CONCEPT AND STAGE 1

This submission has been prepared by Urbis on behalf of the Australian Turf Club (**ATC**). The ATC thanks the Department of Planning, Industry and Environment (**DPIE**) for the opportunity to comment on the Sydney Metro West project (**SSI-10038**).

The ATC are supportive of the NSW Government's significant investment in city-shaping infrastructure in Western Sydney and how it will support the future growth of Parramatta as the Central River City in Greater Sydney. However, the ATC flags that there are potential environmental impacts and operational impacts on the Rosehill Gardens Racecourse (**RHG**) associated with the construction and operation of the Sydney Metro West project, that should be considered in greater detail. This primarily relates to the inadequacy of the EIS reviewing the following:

- Potential impacts on the welfare of thoroughbred racehorses stabled at RHG and staff working on site.
- Potential environmental and operational impacts from the construction of the Sydney Metro West project, including restricted access to site, noise, vibration and dust, and disturbance of events held at RHG.
- Potential financial impacts on the ATC as a result of the above.

Due to the significant landholding size, unique environmental characteristics and sensitive equine receptors at RHG, and the close proximity to the proposed Clyde stabling and maintenance facility, the ATC considers itself to be a critical stakeholder and would welcome the opportunity to be involved in the planning process for the Sydney Metro West project. The ATC appreciates the recent commencement of consultation with Sydney Metro and Transport for NSW (**TfNSW**) and looks forward to on-going discussions.

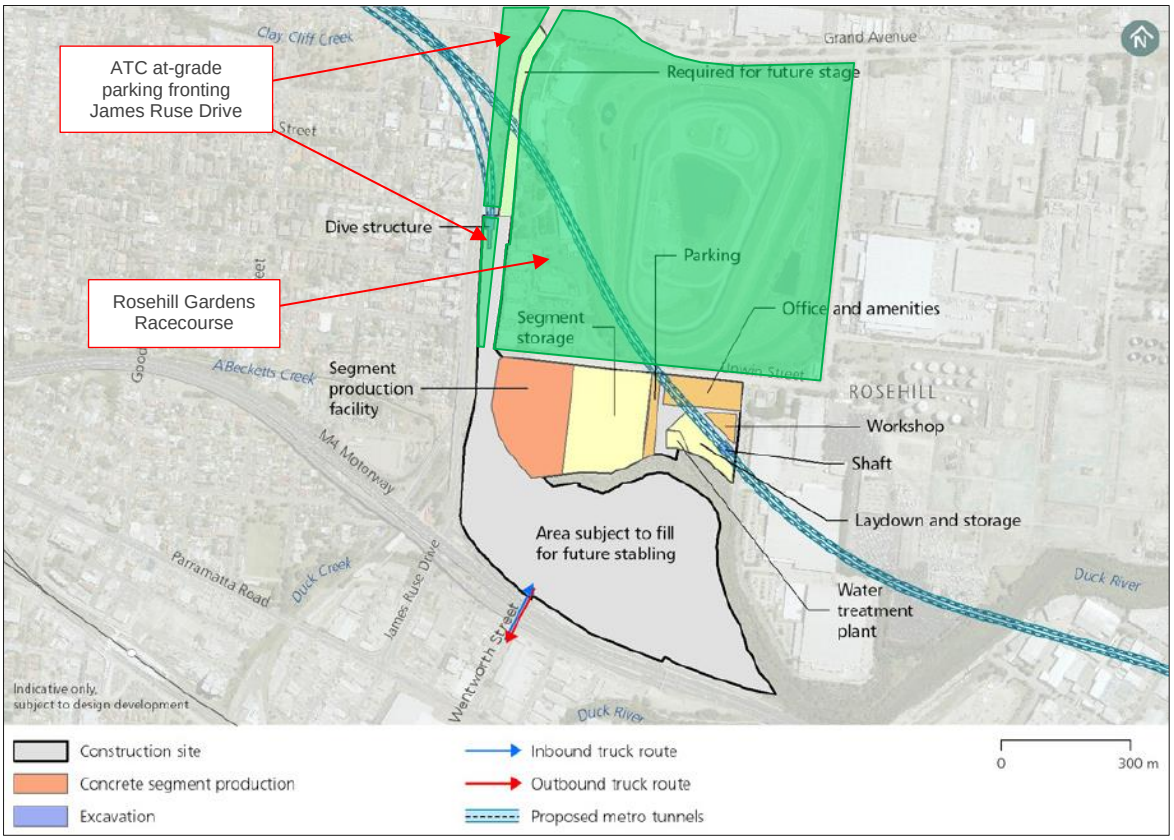
1. ABOUT THE AUSTRALIAN TURF CLUB

The ATC is a not-for-profit organisation with all income reinvested for the benefit of its members and the thoroughbred racing industry. The ATC owns and operates a number of racecourses, thoroughbred racing events, training and stabling facilities across NSW. As you would be aware, the ATC are the owners and operators of RHG (also known as Rosehill Racecourse) with an extensive history within Australia's racing culture for over 130 years.

RHG is considered one of Western Sydney's premier entertainment spots and a major thoroughbred racing venue in Australia. RHG also offers 34 unique venues for non-race day events.

The RHG site is made up of the racetrack proper; training tracks within the infield; the Rosehill Gardens Grandstand; and admin and operational buildings. RHG also provides stabling facilities in the south western corner of the site fronting Unwin Street. In addition to the land containing the racetrack and supporting assets, the ATC owns a corridor of land fronting James Ruse Drive, which is currently used for at-grade car parking during events. This at-grade car parking is separated from the racetrack by the recently decommissioned at-grade T6 Carlingford rail corridor and Rosehill Train Station.

Figure 1 – Rosehill Gardens Racecourse owned by ATC (annotated by Urbis)



Source: Sydney Metro West EIS, Pg 9-17

The ATC also owns lands in proximity to the Racecourse, including the Rosehill Bowling Club on the corner of James Ruse Drive and Hassall Street, and land to the north of the Racecourse between Grand Avenue Drive. The ATC therefore has significant interest in the Sydney Metro West project and are very keen to have on-going engagement with NSW State Government (including Sydney Metro and TfNSW) to facilitate the careful and considered delivery of the project with minimal impacts on the ongoing operations of RHG.

2. KEY OPERATIONS AT ROSEHILL GARDENS RACECOURSE

This section of the Submission outlines the key land uses and daily operations that currently take place at RHG. It is important for DPIE, Sydney Metro and TfNSW to understand this when considering the environmental impacts of the construction and operation of Sydney Metro on the site, which are detailed at Section 5 of this Submission. Figure 2 and Table 1 below are provided to identify the critical elements of RHG, including the sensitive land use areas where racehorses are stabled and train.

Figure 2 RHG Precinct Plan

Source: ATC

Table 1 Description

No.	Description
1	P2 Parking
2	P3 Parking
3	P1 Parking
4	Day Stalls Parking
5	Tracks
6	Infield
7	Stabling
8	Administration & Maintenance
9	Spectator Precinct
10	P4 Parking
11	P5 Parking

STABLING FACILITIES

Item 7 in Figure 2 shows the south west corner of the racecourse contains the RHG stabling facilities. The stabling facilities currently have 400 stalls, with horses stabled on site 24 hours a day, 365 days a year.

The stabling facilities constantly remain at 100 per cent capacity throughout the year. Stabling for thoroughbred racehorses are in high demand in NSW and there are currently limited options or availability elsewhere for Trainers to stable racehorses. Typically, Trainers will rotate horses in and out of the stalls and to various regional properties, as required, for training or resting of horses.

The daily operation of the stables includes training on the racecourse (Item 5). Strappers (staff) will typically arrive on site from 3:30am and trackwork (horse training) will occur between 4am to 8:30am. Horses will then rest until lunchtime, where additional training will occur in walkers or in an equine pool. Activity in the stables will typically quieten from approximately 3pm each day.

In addition to the movement of horses and staff in the stabling facilities, horse floats will access the site from Unwin Street, largely between the hours of 3am and 3pm.

RACEDAY EVENTS

RHG is Western Sydney's premier thoroughbred racing venue and critical to the ATC's operation. Approximately 21 racedays are held per year at RHG with a varying range of attendees dependent on the event and there are also frequent barrier trials.

Autumn and Spring Raceday Carnival events held in March and September/November can attract up to approximately 25,000 patrons. Smaller non-Carnival events can average between 3,500 to 8,000 patrons depending on time of year. Further information on attendance forecasting can be provided upon request.

Mode of transport for raceday attendees is primarily via public transport, with only 20 per cent of attendees arriving via private vehicle, and an additional 10 per cent arriving via taxi, Uber, or similar.

NON RACEDAY EVENTS

RHG also offers 34 unique venues for non-race day events, making the site the largest function and conference centre in Western Sydney. These events include corporate events, trade shows, entertainment and community events and overall, the site provides a significant contribution to the NSW State economy.

The number of events are fairly constant throughout the year, with typically 3 to 5 non raceday events per week. Non raceday events also vary in size, ranging from smaller dinner events up to larger events, including a festival with approximately 15,000 attendees, and exhibition events with capacity for approximately 60,000-70,000 visitors (NSW Caravan and Camping Supershow).

Mode of transport for visitors to non raceday events are often the reverse to raceday events, with a 70 per cent split towards people driving to and parking at the racecourse. The remaining being via public transport and taxi, Uber, etc.

RHG ECONOMIC CONTRIBUTION TO STATE OF NSW

Events held at RHG provide significant economic benefits and jobs to the area, region and NSW. In 2018, RHG provided the following:

- $562,554,460 gross direct and indirect output to the State of NSW.
- Includes:
  - Over $13 million directly attributed to race day tourism.
  - Over $63 million directly attributed to horse operations.
  - Over $25 million directly attributed to meetings and events tourism.
- 2,029 jobs directly generated by events held.

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3. UNDERSTANDING OF THE SYDNEY METRO WEST PROJECT

The ATC understands the proposed Sydney Metro West project under SSI-10038 is for the Concept and Stage 1 construction of the new metro rail line running between Westmead and Sydney CBD. The key components of the project relevant to the ATC include:

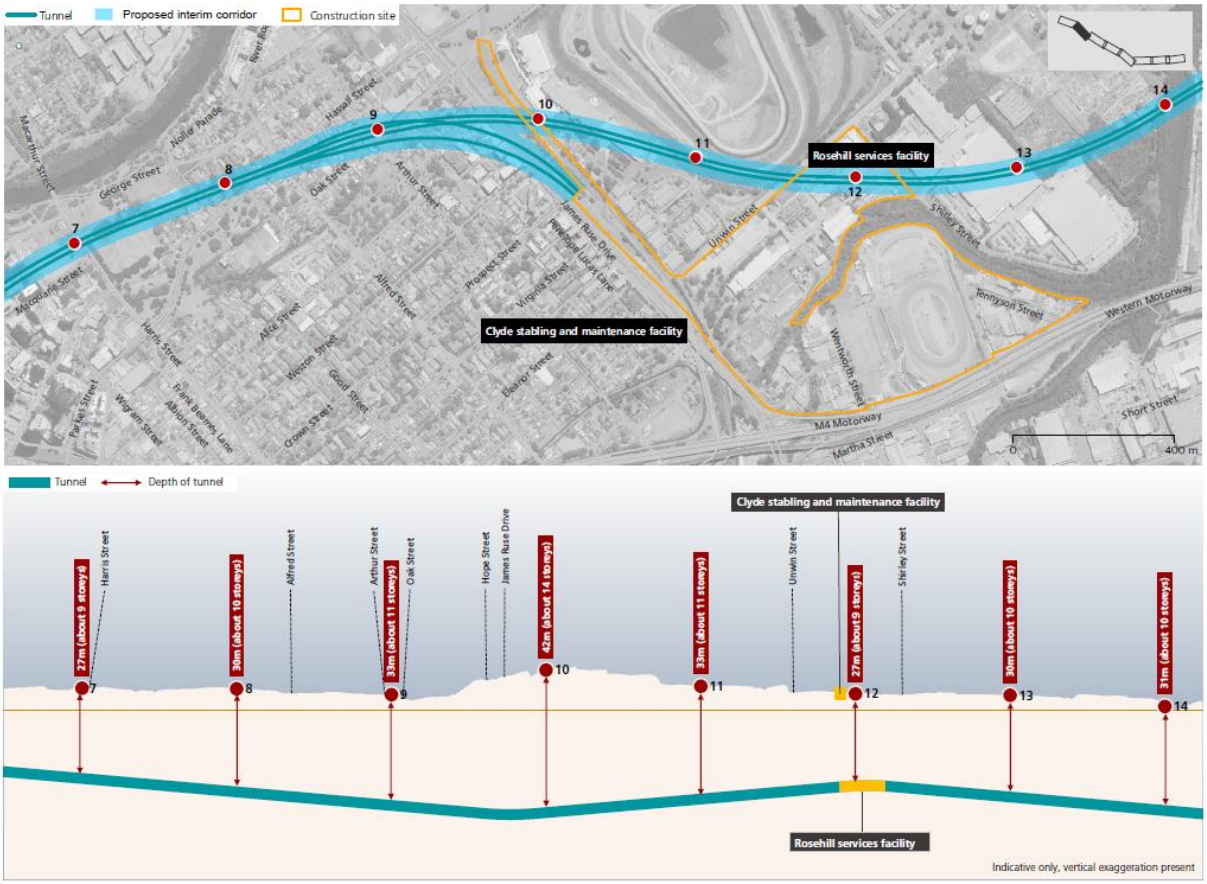
Concept:

- Twin tunnels between Westmead and Sydney CBD
- New metro stations at Westmead, Parramatta, Sydney Olympic Park, North Strathfield, Burwood North, Five Dock, The Bays and Sydney CBD.
- Optional station at Rydalmere is also under investigation.
- A stabling and maintenance facility at Clyde, including mechanical and fresh air ventilation equipment and electrical power substations to supply power for operation.
- Services facilities at Rosehill (within the Clyde stabling and maintenance facility construction site).

Stage 1 works

- Tunnel excavations, including under RHG (as shown in Figure 1 and Figure 3). The alignment and depth of the tunnels shown under RHG are indicative only.
- Shaft excavation for services facility at Rosehill (within the Clyde stabling and maintenance facility construction site).
- Civil works for the stabling and maintenance facility at Clyde including:
  - Construct the land formation for the stabling and maintenance facility.
  - Construct structures over A'Becketts Creek and Duck Creek, including creek realignment works.
  - Construct and operate a temporary precast concrete segment production facility.
  - Excavate the Rosehill services facility.
  - Excavate and construct the Rosehill dive structure and tunnel portal.
- A concrete segment facility for use during construction located at the Clyde stabling and maintenance facility construction site.
- Excavation of a tunnel dive structure and associated tunnels at Rosehill to support a connection between the Clyde stabling and maintenance facility and the mainline metro tunnels, involving:
  - Piling work along the walls of the dive structure
  - Excavation of existing material to below future track level
  - Placement of precast concrete for the cut-and-cover section and to form the tunnel portal.

Figure 3 Indicative alignment and long section of the proposed metro tunnels under RHG



Source: Sydney Metro West EIS, Figure 9-2(b)

4. KEY ENVIRONMENTAL ISSUES

The following section identifies the key environmental issues to the daily operation of RHG as a result of the construction and operation of the Sydney Metro West project. Given, the significant impact the Sydney Metro West project will have on the RHG, the ATC formally requests the opportunity for further discussion with Sydney Metro and TfNSW beyond the formal stakeholder engagement period.

ACCESS

Regardless what mode of transport patrons select to travel to RHG, once patrons are on site, they all enter the Spectator Precinct on foot. It is important to the ATC and vital for its operation that the thousands of patrons that visit the site during each given event can move on foot safely and securely.

For event patrons and visitors, RHG is primarily accessed from James Ruse Drive on the western boundary via the parking areas known as P1 – P4 Parking. Figure 4 on the following page illustrates the current northern at-grade access across the former rail corridor between the P3 Parking Area and the Spectator Precinct. Figure 5 shows the current access provided between the P4 Parking Area and the Spectator Precinct, via the footbridge over the former rail corridor that also serviced the former Rosehill Train Station. Despite the decommissioning of Rosehill Train Station and the rail corridor, the ATC are still using these pedestrian access points for events at all times of day.

Maintaining the existing pedestrian access to RHG across the former T6 Carlingford rail corridor is critical for the on-going operation of the racecourse. Impacts or interruption to these critical access points either as part of Stage 1 of the Sydney Metro West project or future stages, will cause significant and unacceptable restrictions to the operation of events at RHG. Without this access, the ATC would be unable to provide disabled access to the site and will create unsafe and significant walking distance for patrons entering and exiting the site.

Due to the former rail alignment to the west; the proposed metro line works to the south; and the large vehicle movements on Grand Avenue accessing the Camellia industrial precinct; there are no alternative options for safe pedestrian access to the racecourse or into the Spectator Precinct. There is no way of diverting access from the P2, P3 or P4 Parking into RHG. Without the footbridge crossing at the former Rosehill Train Station and the northern at-grade rail crossing, access would be out of the ATC's carparks onto the narrow, unsafe grass foot path on James Ruse Drive and then into Grand Avenue entry, where there is no pedestrian safe access available. This would require significant pedestrian and traffic management to make safe and would likely cause significant impacts on the major road network that are physically impossible for the ATC to achieve, and financially unviable to implement.

Further to the above, the ATC flags that the recent decommissioning of the Rosehill Train Station has resulted in the removal of lighting around the train station and across the footbridge after dark. The footbridge is used by event patrons at all times of day. **The ATC seeks formal confirmation that this access will be maintained for use by the ATC and that suitable lighting after dark is provided to ensure safety and security for pedestrians using the bridge.**

Further to matters above regarding pedestrian access, it is also critical for the operation of RHG that the existing access to the Stabling facilities from Unwin Street (shown in Figure 6) remains unrestricted. This entrance is critical for horse floats to enter and exit the site daily as required and for events personnel and equipment during bump in and bump out for events.

The ATC requests the opportunity for further discussion with Sydney Metro to identify suitable solutions and mitigation measures to secure safe pedestrian and vehicle access to RHG, at all hours 365 days a year.

Figure 4 Current critical northern pedestrian crossing between parking and the RHG Spectator Precinct

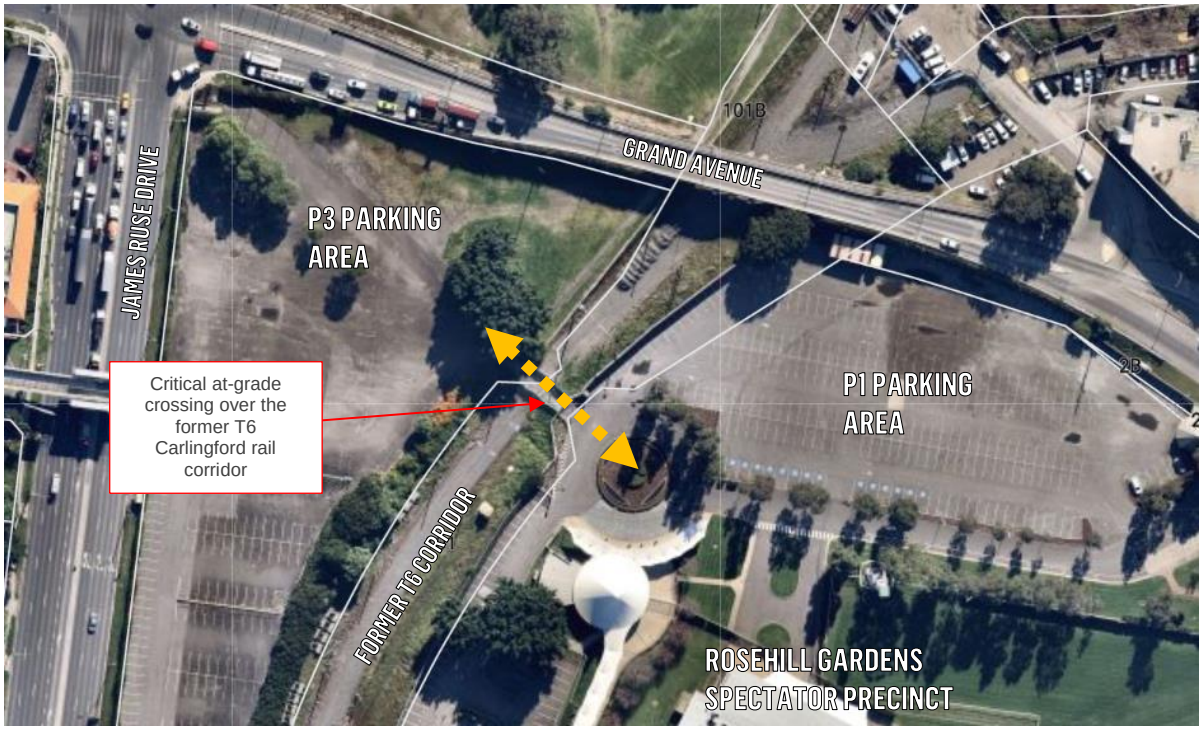
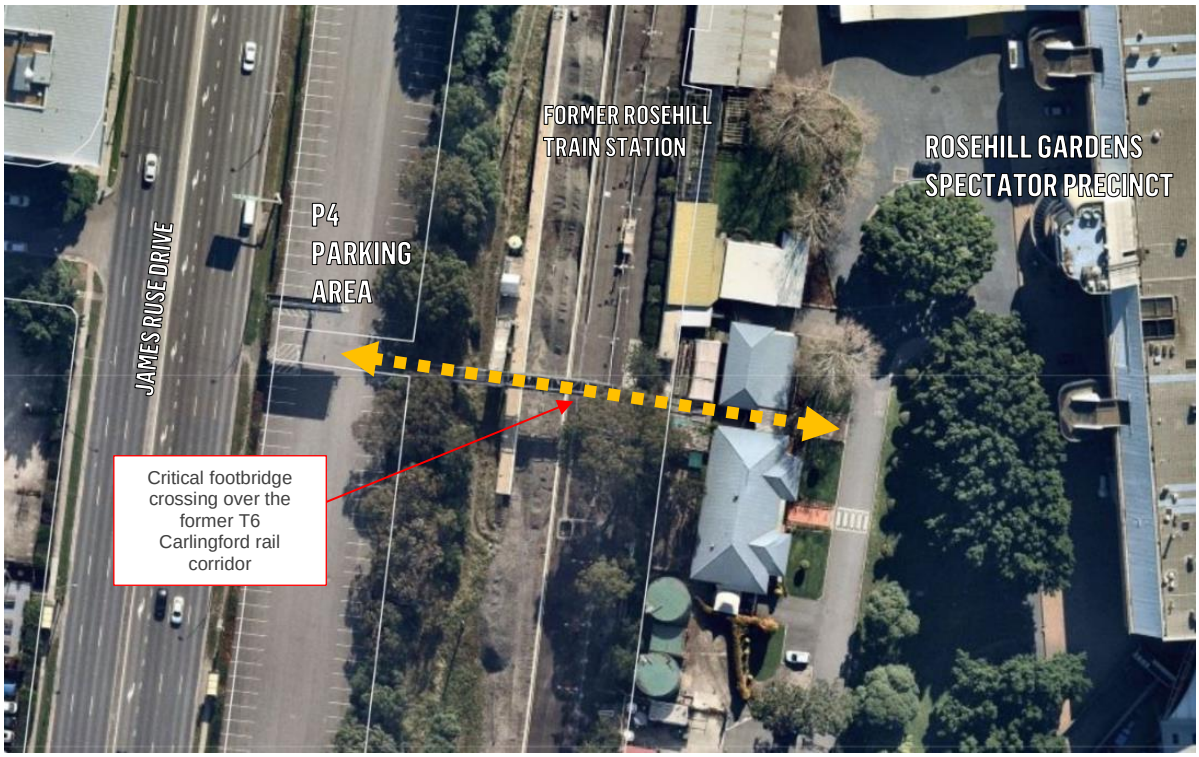


Figure 5 Current critical pedestrian footbridge crossing between parking and the RHG Spectator Precinct



Source: Urbis

Figure 6 Vehicle access to RHG Stabling Facilities from Unwin Street

Source: Urbis

NOISE AND VIBRATION DURING CONSTRUCTION

Chapter 11 of the EIS identifies that subject to approval, construction of Stage 1 of the Sydney Metro West project is planned to commence in 2021, and to be completed in 2026. Much of the works are proposed to be undertaken in standard construction hours, although evening and night-time work would be required during some periods. The ATC understands that some works would also occur 24 hours a day, seven days a week.

The ATC are highly concerned that the potential noise and vibration generated by the proposed works at the Clyde stabling and maintenance facility and tunnelling (underneath and adjacent to RHG), will impact on the operation of stabling, training and racing at RHG. The ATC are particularly concerned about noise and vibration generated by aboveground construction activities including surface construction, piling, excavation; and underground construction activities including controlled blasting - and the **resulting impacts it may have on the welfare of horses stabled at RHG.**

The ATC has commissioned Sydney Laboratory Services (SLS) to undertake noise and vibration monitoring at RHG. A preliminary statement from SLS is attached for reference (**Attachment A**). This is supported by veterinary advice from Dr Craig Suann (ex-Chief Vet for ATC) on the health and welfare of horses exposed to loud noises and vibration related to construction activities (**Attachment B**).

SLS advises there is limited available literature describing the effects of construction (noise or vibration) on an equine receptor. However, there is widely published understanding that:

- human lower limit perception of vibration is between 0.1 and 0.15mm/s.
- for an equine receptor, vibrations that can cause stress in horses are felt at an order of magnitude lower than humans, placing it from 0.01mm/s.
- sudden noise and vibration changes could cause stress.

Dr Craig Suann (Attachment B) advises of the following risks to the welfare of thoroughbred racehorses (**emphasis added**):

> *Thoroughbred racehorses are naturally a prey animal and so respond to any immediate threat by taking flight. Threat may come through visual stimuli, noise or vibration or any combination. This is a natural response, and while horses have been domesticated for many years, in terms of evolution these traits remain as an overriding response. There is no doubt the response of each individual horse can vary substantially, and young fit thoroughbred horses are known to be highly unpredictable. While there is evidence that horses can habituate to some stimuli, sudden, loud or high frequency noises or a sudden change in stimulus, such as those associated with heavy construction processes, can lead to an extreme and uncontrollable flight response.* ***Horses can react in a variety of ways to sudden, loud noise while being ridden or exercised, such as abrupt changes in direction (baulking), galloping uncontrollably and irrationally propelling themselves into traffic, fixed objects or crowds, or rearing on their hindlimbs and flipping backwards or onto their side or striking their head. These reactions pose serious risks to the horse, the rider/handler and to the public and have been known to cause serious and sometimes fatal injuries to both. Such a situation poses a profound workplace safety risk as well as a major horse health and welfare concern.***

The ATC appreciates the EIS has undertaken assessment for noise management with consideration of sensitive receivers. However, most of the consideration for noise and vibration has been for typical residential receivers and for human comfort levels.

RHG has been considered in the assessment as an 'other sensitive' active recreation areas, consistent with the CBD and South East Light Rail Environmental Impact Statement (Transport for NSW, 2013). Table 11-10: NMLs identifies an External Noise Management level of 60 dB for the RHG Stabling Facilities. Notwithstanding, SLS advises that construction work involving piling will result in percussive, sudden onset, audible noise above 60dB in its immediate locality.

The ATC has serious concerns regarding the assessment of noise on page 11-22 of the EIS, stating that:

- *Stage 1 is predicted to result in 'high' worst-case noise impacts at the nearest receivers during the higher noise generating activities. The nearest receivers to the site are generally residential and 'other sensitive' receivers at Rosehill Gardens racecourse (i.e. stables). The worst-case impacts are predicted during enabling works and excavation.*
- *The highest impacts are during 'peak' scenarios which use noise intensive equipment such as rockbreakers. Rockbreakers would, however, only be used intermittently during demolition works, and the total duration is around 15 days. Excavation works would also require intermittent use of rockbreakers over approximately 30 weeks.*

The 'high' worst-case noise impacts on RHG has been assessed in terms of human receivers and does not consider the 'hyper-sensitive' nature of horses stabled at RHG. As SLS has advised, the assessment in the EIS overlooks the fact that horses are magnitudes of order more sensitive to noise than humans and there is a significant risk to animal and human welfare if a horse responds unpredictably to sudden loud noises, or from stress induced by excessively loud noises over an extended period.

Further testing and assessment is required by Sydney Metro to understand the likely impacts on horses stabled at RHG from noise.

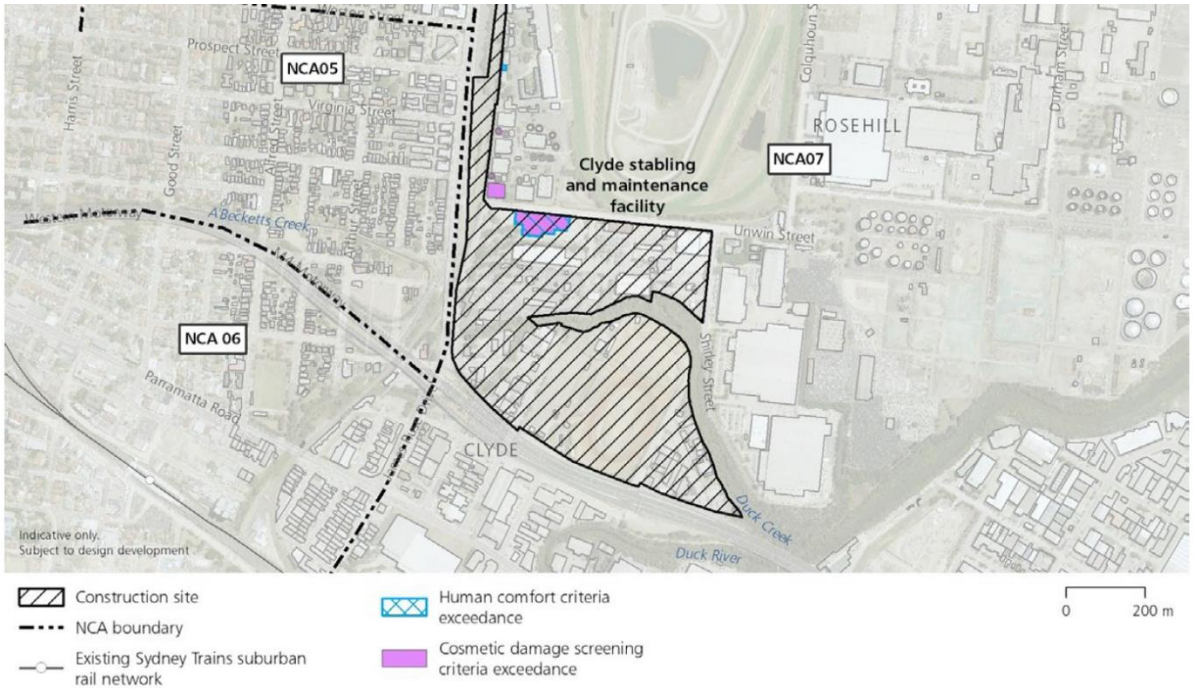
SLS is also commissioned to provide data and advice on the premise of an underground tunnel boring machine (**TBM**) being used for the proposed tunnelling underneath RHG and the stables. Monitoring of the site by SLS to provide a baseline has been underway. Results are provided in Attachment A. There remains uncertainty regarding the trigger levels in the EIS for vibration and noise associated with aboveground and underground works and whether the identified mitigation measures are suitably protective of the horses stabled at RHG.

The EIS includes assessment on impacts from vibration. Page 11-23 of the EIS states that:

> *The predicted impacts during vibration intensive works are shown in Figure 11-12. The predictions are representative of the highest vibration levels that would likely be experienced by the nearest receivers when works are at their closest.*
>
> *The cosmetic damage screening criteria are predicted to be exceeded at four commercial buildings at Rosehill Gardens racecourse located east of the existing rail corridor section of the site. One heritage listed building at 1 Unwin Street, Rosehill, located to the north of the site would also be impacted. This building is a heritage listed free-standing building facade and is not occupied.*
>
> *The human comfort criteria are also predicted to be exceeded at one of the nearest commercial buildings located to the north of the site, meaning occupants of affected buildings may be able to perceive vibration impacts at times when vibration intensive equipment is in use nearby.*
>
> *There are no predicted exceedances of the sensitive equipment screening criteria.*

Figure 11-12 in the EIS also identifies that buildings at RHG, including stabling, will receive vibration impacts that exceed cosmetic damage screening criteria. This indicates there will be significant vibration impacts on hyper-sensitive equine receptors at RHG so far above background levels that it is highly likely to have significant consequences.

Figure 7 Extract of Figure 11-12 – Worst-case vibration impacts – Clyde stabling and maintenance facility construction site



Source: Sydney Metro

Further to impacts from noise and vibration on equine receptors during construction, there are also concerns on the ongoing impacts once the project is completed. Dr Craig Suann advises that:

> *Once the project is completed, it is also conceivable that there might be chronic physiological aberrations in resident horses in the event there is perceptible vibration due to the transit of trains through the tunnels adjacent to the stable complexes.*

The ATC requests further targeted investigation to inform additional requirements and protective measures, including initial discussion with Sydney metro for their work methodology, locations, timing to decide optimal monitoring instrumentation siting.

Further, setting averages based on the human receptor for outdoor levels as trigger levels (i.e 60dB) is not considered meaningful given concern about proximity to works and the sensitivity of the equine receptors. It is recommended that further consultation is undertaken with equine veterinary experts and the thoroughbred industry to determine more appropriate trigger levels at which to abate works and improve controls which may need to include observation based triggers in this scenario.

AIR QUALITY DURING CONSTRUCTION

Chapter 23 of the EIS assesses the potential air quality and mitigation measures to address the impacts, primarily from dust pollution from demolition, earthworks and construction. Table 23-5 in the EIS identifies a potential high risk of unmitigated dust impacts from the Clyde stabling and maintenance facility construction site.

Figure 8 Extract of Table 23-5 in the EIS – Risk of potential unmitigated dust impacts – Clyde stabling and maintenance facility construction site

Construction activity	Magnitude of potential emissions	Potential nuisance impacts (high sensitivity)	Potential human health impacts (medium sensitivity)	Potential ecological impacts (medium sensitivity)
Demolition	Large	High risk	High risk	High risk
Earthworks	Large	High risk	Medium risk	Medium risk
Construction	Large	High risk	Medium risk	Medium risk
Track-out	Large	High risk	Medium risk	Medium risk

Source: Sydney Metro West EIS, pg 23-4

The ATC are concerned that air quality levels have been assessed only in terms of human health impacts. There has been limited consideration for the potential health impacts on thoroughbred racehorses that are stabled at RHG. Further to the testing and research for noise and vibration impacts on horses, the ATC has commissioned independent testing and research for the potential impacts on racehorses that are exposed to high levels of airborne dust over a long period.

The ATC requests the opportunity for further ongoing consultation with Sydney Metro and TfNSW to ascertain the likely impacts on thoroughbred racecourses stabled at RHG.

OPERATIONAL REQUIREMENTS

Based on the access, noise, vibration and dust impacts identified in the previous sections of this Submission, the ATC has significant concerns on the resulting impacts to its daily operations, and ability to continue raceday and non raceday events without interruption. It is important that operational requirements for stabling, raceday and non raceday events are not impacted as it will cause significant financial impact on the ATC. Further, there will be risks to the ATC in terms of meeting the operational requirements of Racing NSW (**RNSW**).

Stabling

Horses are 'flight animals' that are particularly sensitive to sudden loud noises and vibrations. The ATC has observed impacts on horses at Royal Randwick Racecourse (**RRR**) as part of construction for the CBD and South East Light Rail project. Due to the proximity of proposed construction works to RHG Stabling Facilities, there is a high risk that sudden or excessive noises can cause stress in horses.

The impact of excessive dust on the operation of stabling at RHG is also of concern. The impacts of excessive dust on horses has been considered in the Land and Environment Court (**LEC**) – including the impacts on Horse Stud Farms from mining in the Hunter Valley. The ATC are also concerned of the impacts on staff working on the site. In particular, track staff, property services and operations staff that are outdoors for long periods of time and subject to airborne particles. The ATC seeks further information in terms of dust mitigation measures and adequate air monitoring.

Concerns of impacts on horse welfare from noise, vibration and dust could make the stabling of horses in their current location untenable if not addressed properly. **Due to the potential impacts over an extended construction timeframe, there may need to be consideration for possible relocation of the stables. The timeframes and cost of relocating the Stabling Facilities within RHG should be a serious consideration for the Sydney Metro West project.**

Raceday and non raceday events

As highlighted in previous sections, large scale raceday and non raceday events are frequently held at RHG throughout the year. This includes Raceday Carnival events and a major Caravan and Camping event (held each April/May). These large-scale events do occupy the entirety of the racecourse and create high demand for car parking on site.

The Expo Hall, which is in close proximity to the works, operates the NSW Education Standards Authority Marking from late August to December each year, this event is very sensitive to ongoing noise impacts due to the nature of the event being HSC exam/assessment marking.

All events at RHG are important to the ATC and are significant contributors to the local, regional and NSW economy. **The ATC requests further consultation with Sydney Metro and TfNSW to negotiate opportunities for no works or minimal construction periods to allow for events to be held at RHG without restriction, interference or serious disturbance.**

INADEQUACY OF THE EIS

Whatever are the merits of the Sydney Metro West project, the ATC has serious concerns about the adequacy of the technical reports that are being relied upon to support the consideration of the project. The EIS does not properly, fully and completely consider the unique sensitivity of RHG and its most important function being the stabling and managing of 400 thoroughbred racehorses. The EIS provides no expert consideration of the impacts of both the construction works and future operating activities of the Metro upon the health and well-being of the occupants of the stables.

A much greater body of work needs to be carried out in relation to the works and operations of the Metro, some 20 metres from the stables so as to ensure that appropriate mitigation measures and strategies are conditioned into the approval to enable the activities of both the Racecourse and Metro to co-exist.

The ATC are willing to share data and collaborate to ensure the Project is not put in jeopardy due to a lack of proper and reasonable consideration of the environmental issues raised by the EIS but which are not fully ventilated.

5. RECOMMENDATIONS

The ATC kindly requests the following recommendations are considered and actioned:

1. **Sydney Metro acknowledge the sensitive operational requirements for the ATC and RNSW as detailed in this submission.**
2. **There be further ongoing consultation between Sydney Metro and ATC in relation to land acquisition, environmental impacts and operations during construction.**
3. **Sydney Metro staff attend a site visit at RHG Stabling Facilities to understand the unique and sensitive nature of the land use, and undertake further testing in respect to noise, vibration and dust impacts.**
4. **Sydney Metro and ATC further discuss and agree upon appropriate mitigation measures for noise, vibration, dust impacts and address vehicle and pedestrian movements so that RHG can continue operating without unreasonable impacts.**

6. CONCLUSION

The ATC looks forward to working closely with the NSW Government to address the key environmental impacts, mitigation measures and operational requirements for the delivery of the Sydney Metro West project, with minimised impacts on the operation of the RHG. The ATC also looks forward to further discussions with Sydney Metro and TfNSW regarding the issues raised in this submission.

In the interim, please do not hesitate to contact Richard Barry or myself on 02 8233 9900, shorsfield@urbis.com.au or rbarry@urbis.com.au should you require any additional information regarding this submission or to arrange a meeting.

Yours faithfully,

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