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Our Ref: BRD-L-Gateway-0001

Thursday, December 19, 2019

Dear Ms Scott,

**Comments on Sydney Gateway Road Project (SSI 9737)**

This submission has been prepared by the Australian Rail Track Corporation (ARTC) in relation to the State Significant Infrastructure application for the Sydney Gateway Road Project (Sydney Gateway) (SSI 9739) prepared by the NSW Roads and Maritime Service (RMS).

The project scope has the chance to significantly impact ARTC operations and maintenance both during and post construction. Additionally, ARTC are progressing a State Significant Infrastructure application for the Botany Rail Duplication Project (SSI 9714) with the Department of Planning, Industry and Environment (DPIE), which proposes duplication of approximately 3 km of an existing section of single track along the Botany Line and associated works. Public exhibition of the Environmental Impact Statement (EIS) for the Botany Rail Duplication Project ended on 13 November 2019 and ARTC are reviewing the submissions received during this period.

The eastern portion of Sydney Gateway is located immediately adjacent to the northern portion of the Botany Rail Duplication Project, as the existing Botany Line is located parallel to Qantas Drive where upgrades, including road widening, are proposed by Sydney Gateway. It is also expected that the construction of both projects will overlap.

Given the interface between ARTC's operations and well as the two projects, ARTC's Third Party Interface Team and Sydney Projects Team have reviewed the EIS for the Sydney Gateway proposal. ARTC would like to express its support for the proposal subject to consideration and resolution of the following key issues.

If you have any queries or would like to discuss these comments further, please feel free to contact me on the details above.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Michelle Caldwell-Shaw', with a long, sweeping horizontal stroke extending to the right.

Michelle Caldwell-Shaw

Portfolio Manager Third Party Projects

### ARTC as a Key Stakeholder

1	General Comment	ARTC was not invited to review the EIS during the adequacy review process by DPIE.
2	General Comment	ARTC's interest as a stakeholder is not well described in the EIS. ARTC would expect the project to thoughtfully consider impacts to ARTC's operations and business considering the scope of the project in and around ARTC's railway corridor.
3	Section 4.1.3	ARTC is listed as a Group 3 stakeholder in the Section 4.1.3 of the EIS which includes peak bodies, local businesses, and interest groups. ARTC disagrees with this classification and requests it be treated as a Group 2 stakeholder (landowners, leaseholders, and utility companies directly impacted) to appropriately reflect its relationship to the project. It is noted that Appendix E- Community and Stakeholder Consultation Report of the EIS classifies ARTC as a Group 2 stakeholder (page 33).
4	Section 4.3.2	Consultation and collaboration with ARTC around key issues such as construction methodology, cumulative impacts, noise and traffic have not been addressed. ARTC requests that further detail on how these issues have been considered in EIS is provided.
5	Section 9.6.1	This section identifies that the Proponent would co-ordinate with ARTC and the Botany Rail Duplication contractor, for works in the vicinity of Robey and O'Riordan streets to minimise the potential for cumulative impacts. ARTC supports this approach.
6	Section 10.6.1	This section identifies that RMS would ensure the construction contractor(s) for the Sydney Gateway Road Project consult with the contractors for the Botany Rail Duplication Project, to coordinate out of hours work and ensure appropriate respite is provided to affected receivers as far as possible. ARTC supports this approach.
7	Mitigation measure TT2	RMS have committed to developing the Construction Traffic and Access Management Plan in consultation with ARTC. ARTC supports this approach.



*Risks to ARTC Operations and Rail Safety Obligations*

8	Noise Impact	The current alignment of the noise attenuation structures does not run adjacent to the rail corridor. If the updated design changes this alignment, it is requested ARTC be directly consulted in relation to acoustic considerations from rail noise reflection.
9	Light Spill	Visibility of lights from the rail corridor (for train drivers) can impact operations, particularly for red or green lights similar to signals. Section 7.10.7 identifies that screens would be installed to manage headlight glare. Similarly, Section 7.10.10 identifies a number of standards to be considered in the detailed design in relation to lighting. It is not clear, however, whether these approaches effectively manage the potential impacts of new lights to the operation of the adjacent rail corridor. Where there is the potential for lighting including but not limited to headlights, brake lights, street lighting or visual messaging signs, to be visible from the train driver's cabins during rail operation, it is requested that ARTC be directly consulted on the design approach to manage potential impacts.