



Submission to North South Rail Line and South West Rail Link Extension



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Executive Summary

The current land-use and infrastructure planning by the NSW Government reflects a defining moment in shaping the Greater Sydney Region; and in particular Western Sydney, including the Camden LGA. The ongoing corridor protection process for the North South Rail Line (NSRL) and the South West Rail Link Extension (SWRL Extension), as well as the Outer Sydney Orbital (OSO), will facilitate significant change to the Camden LGA, bringing with it a range of facilities, services, employment and other exciting opportunities for the community. Consequently, the corridor protection phase of the project is critical in establishing a framework to facilitate an integrated approach to transport and land-use planning, particularly in the South West Priority Growth Area (SWPGA).

While by some assessments the project is a positive initiative for Western Sydney, including the Camden LGA, there continues to be multiple concerned stakeholders regarding the proposed corridor alignment. It is important that the NSW Government continues to effectively engage with the affected stakeholders and broader community, by acknowledging and taking on board the specific feedback provided. Furthermore, Council strongly advocates on behalf of potentially affected property owners that any adverse impacts are limited as much as possible, and that alternate options are thoroughly explored by Transport for NSW through engagement with these property owners.

Camden Council has identified a number of key issues regarding protection of a corridor for the NSRL and SWRL Extension, highlighting points of concern, implications and recommendations for project outcomes. Council's submission is structured in response to the headline issues identified in Transport for NSW's *'Draft Strategic Environmental Assessment'* report, as placed on public exhibition on 26 March 2018. Council would welcome the opportunity to engage further with Transport for NSW in discussing these issues, to assist in identifying a corridor for the NSRL and SWRL Extension that is to the benefit of all impacted stakeholders.

Key Messages

To assist Transport for NSW in assessing the following submission, Council's key messages are grouped to align with the NSRL and SWRL Extension Corridors – *Draft Strategic Environmental Assessment* report; namely:

1. The recommended corridors;
2. Land-use and property impacts;
3. Economic impacts;
4. Traffic and transport;
5. Noise and vibration;
6. Visual amenity, built form and urban design;
7. Soil and water;
8. Biodiversity and air quality
9. Heritage; and
10. Social impacts.

1. The recommended corridors

Key Issue for the Camden LGA – to realise the community vision of appropriate urban development for sustainable growth via an integrated Western Sydney rail network between the NSRL & the SWRL Extension, there is a need to identify all future station locations along the rail corridors and to include a ‘Y-link’ between the NSRL and SWRL Extension.

While certain issues raised in Council’s 2015 submission on the rail corridor were resolved by Transport for NSW (e.g. undergrounding through existing residential and commercial precincts), it is noted other issues were not addressed (e.g. review of the Structure Plan in the context of a rail corridor, ‘Y-link’ alignment connection between the NSRL and the SWRL Extension etc.); resulting in a need for Transport for NSW to re-visit the issues raised by Council in its 2015 submission. The intent of the ‘Y-link’ alignment is to facilitate an integrated customer experience for commuters travelling from the southern areas of the Camden LGA via heavy rail on the NSRL via a ‘Y-link’ connection to the SWRL Extension.

To ensure the integrity of a recommended corridor (including the ‘Y-link’ connection), and that it supports sustainable urban development, early advice on the rail type for the NSRL (i.e. heavy rail vs. metro rail), and of station locations is imperative. This will provide greater certainty for commuters on the Western Sydney rail network, and allow for a holistic approach to strategic planning in the SWPGA, via a centres hierarchy study in review of the Structure Plan.

In the absence of identified station locations between the Badgerys Creek Aerotropolis Station and Oran Park (and Leppington via the SWRL Extension), and between Narellan and Macarthur, there is a significant gap in the ability for Council to facilitate a strategic vision for liveable communities with centres and housing in close proximity to rail infrastructure.

2. Land-use and property impacts

Key Issue for the Camden LGA – there is an urgent need to determine a timeframe for corridor acquisition in support of existing landowners, construction of strategic road and rail infrastructure, along with a timeframe for a planning review needed as a result of this infrastructure to allow key land-use planning decisions to be made.

To ensure existing and future customers/community (including existing landowners) are best served, it is important that Transport for NSW work with Council and the Greater Sydney Commission in determining definitive timeframes for the corridor protection, land acquisition and future construction of the NSRL and SWRL Extension.

In managing the future provision of rail in Western Sydney, a strategic approach such as staged construction of the rail corridor on a ‘precinct-by-precinct’ basis is an option worthy of consideration by Transport for NSW, as it promotes sustainable urban development supported by transport infrastructure.

In proceeding with the NSRL & SWRL Extension corridor protection project, it is imperative that Transport for NSW work collaboratively with Council, the Greater Sydney Commission and the Department of Planning and Environment, in facilitating a concurrent review of the SWPGA Structure Plan, to ensure an integrated outcome of urban and transport planning objectives.

Further to the previous point, this collaboration between layers and arms of government should include development of a strategy to address potentially problematic issues such as proposed higher density development in key centres, before the rail line is constructed. A strategy is needed to determine how the orderly rate of development may be managed to mitigate any adverse urban planning outcomes.

3. Economic impacts

Key Issue for the Camden LGA – to support economic growth, urgent action is required to alleviate congestion throughout the local road network via the early construction of the NSRL through to Oran Park, Narellan and Macarthur.

Effective land-use and transport integration is required to ensure positive growth and investment outcomes occur in Western Sydney. With the projected population growth for Western Sydney, both Australian and NSW government investment in transport infrastructure e.g. NSRL, OSO, Western Sydney Airport (WSA) etc. will influence core planning objectives, including affordable housing, connectivity, liveability, resilience and sustainability.

The recently announced Western Sydney City Deal confirms funding for part of the NSRL and SWRL Extension. However, to date there is no funding commitment for construction of the full extent of the rail line through to Oran Park, Narellan and Macarthur.

As part of the NSW Government's vision of a system to support the growing Greater Sydney economy, public transport can play a pivotal role in alleviating urban congestion. An early commitment to constructing the full extent of the NSRL and SWRL Extension will alleviate congestion and improve travel times in Western Sydney.

4. Traffic and transport

Key Issue for the Camden LGA – needs to be supported by integrated land-use and transport planning which supports sustainable transport and development, including future public transport opportunities, a functional road network, and the early and coordinated provision of roads and transport infrastructure ahead of development.

There is an urgent need for a review of the 'SWPGA Road Network Strategy', in the context of the NSRL and SWRL Extension corridor protection project. Similarly, an integrated review of other sustainable transport modes (bus network, pedestrian, and cycling networks) is also required, along with any capacity for the promotion of interim use on the broader transport network (where corridor protection has occurred e.g. provision of rapid bus service in the corridor).

A joint approach to these projects will ensure integrated land-use and transport planning outcomes within the Camden LGA, through the early, coordinated provision of roads and infrastructure ahead of development.

5. Noise and vibration

Key Issue for the Camden LGA – adverse noise and vibration has the potential to diminish the ‘liveability’ of the Camden LGA. An early, thorough assessment of the cumulative noise and vibration impacts from the NSRL and SWRL Extension (combined with future noise from the OSO and WSA) is needed.

The scale of infrastructure being provided in Western Sydney, particularly transport-oriented infrastructure, will result in increased noise and vibration in the Camden LGA; both during construction and operation. A thorough assessment is urgently required to evaluate the extent to which the NSRL and SWRL Extension (combined with future noise from the OSO and WSA) will contribute to this impact.

6. Visual amenity, built form and urban design

Key Issue for the Camden LGA – explore further underground options, appropriate mitigation measures for all parts of the rail line (e.g. scale of Bringelly Y-junction), and evaluate cumulative impacts of large-scale infrastructure projects in Western Sydney.

Council notes that the scale of a NSRL and SWRL Extension will be significant in transforming the existing landscape. It is essential therefore that appropriate steps are taken in planning for this change, including:

- Investigation of further underground options, and that appropriate mitigation measures are fully utilised to limit adverse impacts on visual amenity, built form and urban design.
- A continued collaborative approach by Transport for NSW to integrated land-use and transport planning, particularly with regard to identifying development density in proximity to future rail station sites, and the possibility of constructing the NSRL in stages consistent with the rezoning/land release process in the SWPGA.
- In conducting a holistic assessment to evaluate the cumulative impacts of the many large-scale infrastructure projects in Western Sydney, a determination is needed as to how they may adversely affect visual amenity, built form and urban design in the Camden LGA.

7. Soil and water

Key Issue for the Camden LGA – construction of the NSRL and SWRL Extension will result in extensive tunnelling and traversing various river/creek systems etc. resulting in the need for an Environmental Impact Assessment to quantify any implications.

The resulting construction of a rail corridor would involve substantive structures in the form of bridges and culverts, traversing an extensive area that is inclusive of the Nepean River, along with significant creeks and tributaries; all while subject to concurrent urbanisation of adjacent areas. Furthermore, tunnelling would also present a separate set of challenges, regarding the geological aspects of the area.

This complex situation warrants a more robust investigation by Transport for NSW at the corridor protection phase, to provide greater certainty of the subject implications for the Camden LGA.

8. Biodiversity and air quality

Key Issue for the Camden LGA – while most of the rail corridor is located within biocertified areas, a 'Review of Environmental Factors' (REF) is needed prior to corridor protection, that thoroughly addresses issues of biodiversity and air quality.

While Transport for NSW has referenced biodiversity impact mitigation initiatives for the NSRL and SWRL Extension corridor, there remains some issues that were not addressed from the 2015 consultation period e.g. loss of a considerable number of remnant trees outside the existing Native Vegetation Area.

TfNSW's SEA indicates that the proposed NSRL and SWRL Extension corridors and the provision of electrified public transport will result in lower net emissions when compared to the increase in motor vehicle travel which would be expected to occur in the absence of rail corridors. However, further investigation is required via an EIA to confirm and quantify these claimed benefits.

Council also notes that the South Creek corridor has been identified within the City Deal as an important environmental spine for the Western City, requiring restoration and protection. Without sufficient detail available in the SEA, Council insists that TfNSW give careful consideration to any possible impacts on this vital part of our region and continues to engage with Council and the community.

In protection of the corridor alignment, and through preparation of an REF, it is necessary that Transport for NSW undertake appropriate studies to determine the impact of the proposed corridor; and that Council and the community is consulted on environmental-related matters in contributing toward the project.

9. Heritage

Key Issue for the Camden LGA – The Camden LGA contains heritage items which reflect Camden's history, and will help to shape Camden's identity through a period of urban growth and transformation. Infrastructure projects such as the rail corridor must be sensitive in supporting and maintaining the Camden LGA's heritage and historical links.

Through identifying the proposed rail corridor, heritage listed items (as noted in 'Camden Local Environmental Plan 2010', and 'Camden Development Control Plan 2011')

(Camden DCP)) should be considered. In protecting the corridor alignment, and any preparation of any REF, it is imperative that Council is consulted on heritage-related matters in contributing toward the project.

To ensure rail corridor protection facilitates heritage preservation in the Camden LGA, Transport for NSW needs to conduct a desktop analysis of heritage items within/in proximity to the proposed corridors.

10. Social impacts

Key Issue for the Camden LGA – Transport for NSW’s corridor protection projects are having a significant impact on certain parts of the Camden LGA community; in terms of human health (e.g. stress) as well as potential ‘life-changing’ outcomes (e.g. home displacement). More work is needed by the NSW Government to effectively connect with our community on these significant issues.

Council has received multiple representations from the Camden LGA community as to the inadequate level of consultation to date by Transport for NSW on the corridor protection projects. It is imperative that Transport for NSW continue to engage with impacted residents, landowners, and Council, in positively promoting good governance for infrastructure planning in NSW.

An option available to Transport for NSW in engaging consultation is to expand its *Draft Strategic Environment Assessment* report for the NSRL and SWRL Extension, to robustly investigate the ‘human health’ impacts of the corridor protection projects. This could explore areas such as emerging social issues associated with locating heavy passenger rail in a developing urban area.

Ongoing engagement

Council encourages Transport for NSW to have an ongoing commitment to engage with Council and the community, to ensure that any future transport planning initiatives (i.e. corridor protection) is implemented holistically.

Council’s Submission to Outer Sydney Orbital Corridor Identification

It is noted that the NSW Government has concurrently exhibited the *Outer Sydney Orbital Corridor Identification* project, with the *North South Rail Line and South West Rail Link Extension Corridor Identification* project.

Council’s submission in response to the *OSO Corridor Identification* project is provided to Transport for NSW under separate cover. Council requests that consideration is given to both its submission documents, in evaluating the cumulative impacts of transport corridor identification in the Camden LGA.

The following parts of this submission are structured to respond to each of the headline issues identified in the corresponding sections of the NSRL and SWRL Extension corridor *Draft Strategic Environment Assessment* report.

NSRL & SWRL Extension Corridor

1. Recommended corridor

- It is noted that while some of the issues regarding corridor alignment identified in Council's 2015 submission have been addressed e.g. undergrounding of the corridor south of Oran Park, further work is still required in corridor refinement. Council's 2015 submission is tabled as an attachment to this document, with the intent for Transport for NSW to re-visit the issues previously raised by Council regarding rail corridor alignment e.g. 'Y-link' alignment connection between the NSRL and the SWRL Extension.

Clarification is also sought as to the intended type of rail operation of the NSRL. Council would commend the provision of 'heavy rail' on the NSRL to ensure its integration with the existing rail network. A 'metro style rail' on the NSRL (similar to the Sydney Metro Northwest project) would compel any commuter between Bringelly and Macarthur to change trains when travelling to other parts of the rail network (e.g. Sydney CBD), creating longer travel times for the Western Sydney community.

The intent of the 'Y-link' alignment is to facilitate an integrated customer experience for commuters travelling from the southern areas of the Camden LGA. With the provision of heavy rail on the NSRL via a 'Y-link' connection to the SWRL Extension, commuters will be able to benefit from a seamless connection to all parts of the Western Sydney rail network.

- Further to the issues raised previously regarding corridor alignment, Council notes that the current material on exhibition of the NSRL only identifies the proposed Narellan and Oran Park stations within the Camden LGA. The exhibition material also states that planning for suitable station locations along the corridor will be undertaken in the future.

This advice is of some concern to Council, as to how it relates to the future planning of the SWPGA. The *Western City District Plan* identifies the need for a local centres hierarchy to be established and is the responsibility of Council to undertake this strategic framework. A key principle of the local centres hierarchy is locating centres with public transport and station locations.

Camden Council's *Community Strategic Plan June 2017*, notes the following strategy under 'Key Direction 1 – Actively Managing Camden LGA's Growth';

Strategies

1.1.1 Ensure provision of appropriate urban development for sustainable growth in the Camden LGA

1.1.2 Manage and plan for a balance between population growth, urban development and environmental protection

1.1.3 Ensure adequate, accessible and high quality open and public space is made available across the Camden LGA

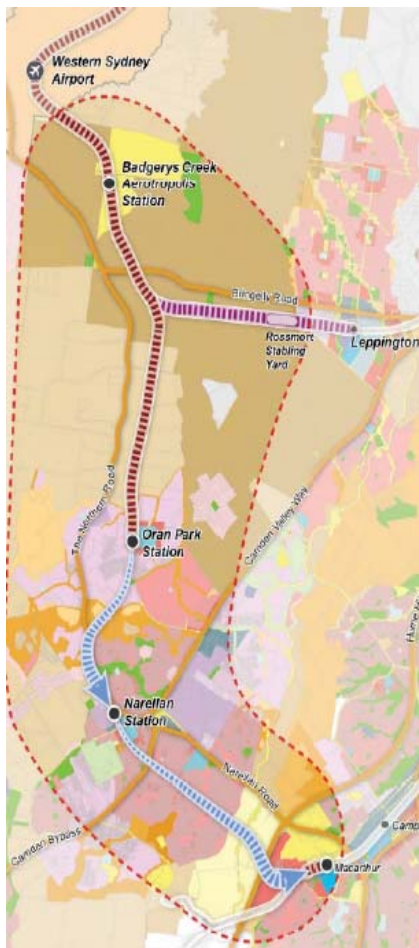
1.2.1 Ensure rural land and associated landscape impacts are addressed.

1.1.1 Ensure the provision of appropriate urban development for sustainable growth in the Camden LGA.

Source: Camden Community Strategic Plan – June 2017

To realise this community vision of sustainable growth in the Camden LGA, it is imperative that the future station locations are known.

With the NSRL exhibition documents not identifying station locations between the Badgerys Creek Aerotropolis Station and Oran Park (as well as between Narellan and Macarthur), there is a significant gap in the ability for Council to undertake the strategic vision for the SWPGA. Council and the Department of Planning and Environment are currently in the precinct planning process; in the absence of this information, it is difficult to adequately plan for liveable communities with centres and housing in close proximity to rail infrastructure, without the proposed station locations.



Source: Draft Strategic Environmental Assessment Report (page 150)

- As in the case of the NSRL, Council notes that the current material on exhibition for the SWRL Extension Corridor only identifies the proposed Badgerys Creek Aerotropolis station; but not if any other stations will be located along its extent i.e. Rossmore.

As noted previously, the *Western City District Plan* identifies the need for a local centres hierarchy to be established, and it is the responsibility of Council to undertake this strategic framework. A key principle of the local centres hierarchy is locating centres with public transport and station locations.

With the SWRL Extension exhibition documents not identifying station locations between Badgerys Creek Aerotropolis Station and Leppington, there is a significant gap in the ability for Council to undertake the strategic vision for the SWPGA.

Council recommends that Transport for NSW:

- Re-visit the issues raised by Council in its 2015 submission to Transport for NSW regarding corridor alignment for the NSRL (and the SWRL Extension).
- Identify station locations, and integrate their placement in the Department of Planning and Environment's review of the Structure Plan for the SWPGA. This will allow for a holistic approach to strategic planning in the SWPGA, and for a centres hierarchy study to be undertaken.

2. Land-use and property impacts

- The importance of protection for the strategic NSRL is acknowledged; combined with other corridors throughout Western Sydney e.g. OSO; it will form an integral part of Sydney's need for a functional transport network.

Notwithstanding the importance of this corridor, it is also noted that the sterilisation of land once transport corridor options are defined highlights the need to determine a clear timetable for acquisition, beyond the statutory planning protections. This will provide greater certainty around the approach to development applications involving significant capital investment.

In proceeding with the identification of any transport corridor option alignments and the protection of a corridor via statutory planning controls, the need for a clear and timely program for land acquisition is important. Implications for the sterilisation of land resulting from corridor protection will be significant for certain landowners.

Transport for NSW's information brochures state, with regard to land acquisitions for the corridor:

"There is no intention or need to immediately acquire land or property.

Acquisition normally occurs close to when the infrastructure is to be built, and this could be years or decades in the future".

There is some cause to dispute these statements – certain landowners may see there to be an express need for immediate acquisition of their land or property, to provide them with certainty for what is often their most significant asset/investment.

As to the point of acquisition occurring closer to the construction date, the Australian Government's example of acquiring land for the WSA site in advance, over several decades, demonstrates that early land acquisition for significant infrastructure projects is common, and provides certainty for all stakeholders.

Transport for NSW would be aware that landowners had previously purchased land within the SWRL Extension exhibited corridor alignment, and subsequently faced degrees of uncertainty regarding interim use, securing finance etc. as a result. Coupled with other associated issues, such as a potential change in how

the subject land is valued (thus having an impact on the value of Council Rates), this may have potentially adverse impacts upon some landowners.

- Investigation into a staged release of precincts in the SWPGA, concurrently with staged construction of a NSRL (i.e. one station and rail for each precinct, as it's released), with a view for a timely roll-out of the rail line, should be a consideration in protection of the rail corridor. For example, an option of releasing a new precinct in the SWPGA to correspond with staged construction of the rail line, may promote an orderly release of land for development supported by infrastructure. An approach of one rail station constructed for each precinct released may warrant further investigation.
- The NSRL and SWRL Extension projects provide a significant opportunity for a targeted approach to integrated land-use planning and transit orientated development. However, based on the existing SWPGA Structure Plan, the project may potentially result in planning outcomes inconsistent with this approach.

For example, the existing 'Growth Centres Model' of achieving 15 to 18 dwellings per hectare may be considerably altered throughout parts of the Camden LGA, particularly in proximity to future rail station locations. Given development yields around the Leppington rail station are projected at 25-30 dwellings per hectare, the onset of 4-6 new stations resulting from the SWRL Extension may potentially alter development densities.

An additional element to this issue is the period of transition in time between when the corridor is identified, and when the SWRL Extension is constructed. It may be reasonable to expect that development will proceed in anticipation of future rail station locations, without the rail line being in place. This is further complicated by applying existing planning controls that may be inconsistent with future land-use. The potential implications of this issue should warrant a concurrent review/release of the SWPGA Structure Plan, ensuring that adequate planning arrangements are confirmed as part of a rail corridor protection.

- The issue of timing in delivery of the SWRL Extension is critical as to its potential impact on development, particularly for pre-empting re-zonings in the SWPGA. For example, permitting higher density development in key centres before the rail line is constructed may



be problematic (i.e. from low density to high density, in the absence of the necessary supporting transport infrastructure).

As part of a concept plan for delivery of the SWRL Extension, a strategy is required to determine how the orderly rate of development may be managed to mitigate any adverse urban planning outcomes resulting from this phenomenon, whether temporary or permanent. For example, residential areas adjacent to rail stations feature an option to up-lift zoning once the station is constructed.

Council recommends that Transport for NSW:

- On protecting the future transport corridor (rail) via statutory planning controls, proceed to implement a timely land acquisition strategy, and clarify permissible interim land-uses, with a view to circumventing any adverse planning outcome on any impacted landowners.
- As part of the further investigation into the NSRL corridor, that Transport for NSW work collaboratively with Council and the Greater Sydney Commission, in determining options for a staged approach to rail line construction concurrent with precinct release in the SWPGA.
- In proceeding with the SWRL Extension corridor protection project, Transport for NSW work collaboratively with Council, the Greater Sydney Commission and the Department of Planning and Environment, in facilitating a concurrent review of the SWPGA Structure Plan, to ensure an integrated outcome of urban and transport planning objectives.
- Develop a strategy to address potentially problematic issues such as proposed higher density development in key centres, before the rail line is constructed. A strategy is needed to determine how the orderly rate of development may be managed to mitigate any adverse urban planning outcomes, whether temporary or permanent.

3. Economic impacts

- Council's Economic Development Strategy for the Camden LGA seeks to undertake an active role in developing a strong and prosperous local economy as a key part of managing the large-scale urban growth of the area.

In support of this initiative and others like it throughout Western Sydney, a transport system is needed that will effectively promote the efficient exchange of goods and services; particularly through strategic hubs that have proximity to the NSRL in the Broader Western Sydney Employment

Strategies

3.1.1 Ensure employment, tourism and education opportunities are expanded across the Camden LGA

3.1.2 Maintain and develop the existing lifestyle setting to further attract tourists and businesses to the Camden LGA

3.1.3 Activate under-utilised public and private spaces across the Camden LGA

3.1.4 Strengthen and support business growth and attract new industries

Source: Camden Community Strategic Plan – June 2017

Area and the WSA. The early development of rail options will ensure access to a reliable and sustained labour force along the Western Sydney growth corridor, between Penrith and Campbelltown-Macarthur.

It is acknowledged that the Broader Western Sydney Employment Area and the WSA will have a crucial role in generating future employment and economic benefits, which is important to sustaining future communities in the Camden LGA. In this regard, the *Camden Council Economic Development Strategy – July 2013* states:

- *It will be critical to secure infrastructure to support economic development in line with population growth. The development of a large major centre in the north serviced by a train line and the upgrading of major roads are key underpinnings for economic development for the LGA.*
- *Opening up the transport system will help encourage the relocation of businesses, particularly for those businesses requiring access to Sydney CBD, Port Botany, the coast and the south of the State.*
- *The planned development of the rail link, improved roads and increased public transportation will support growth of the tourism sector for the Camden region.*

The key concern for Council is, notwithstanding the commitment to a NSRL through its corridor protection, and its provision via the Western Sydney City Deal for the northern section, there remains no definitive commitment to timing in the construction of a rail line through to Oran Park, Narellan and Macarthur.

Transport for NSW's *Draft Strategic Environmental Assessment* report for the NSRL states the following;

The future Western Sydney Airport is expected to generate 9,000 direct jobs by the early 2030's and this is expected to increase to 60,000 jobs by 2063. In addition to this, Western Sydney Airport is directly generating \$77 million, and \$145 million for the rest of Sydney by the 2030's. By 2063, Western Sydney Airport will boost the Western Sydney economy by \$1.5 billion a year and \$4.6 billion Sydney-wide. (page 122)

Council contests the probability of these projections, in the absence of constructing the full extent of the NSRL. While it is acknowledged \$3.6 billion is invested into roads via the Western Sydney Infrastructure Plan, there remains no integrated road network strategy for the SWPGA nor the 'Western Sydney Airport Priority Growth Area'. Consequently, there is no certainty that a \$3.6 billion investment in roads will deliver a functional road network to facilitate the projected economic benefits associated with the WSA; particularly in the absence in definitive timeframes for a fully constructed OSO.

Council recommends that only a diversified transport network, that includes a constructed NSRL, will realise the economic objectives for Western Sydney.

Council recommends that Transport for NSW:

- In collaboration with Council, the Greater Sydney Commission and the Department of Planning & Environment, actively pursue the early construction of the full extent of the NSRL, through to Oran Park, Narellan and Macarthur.

4. Traffic and transport

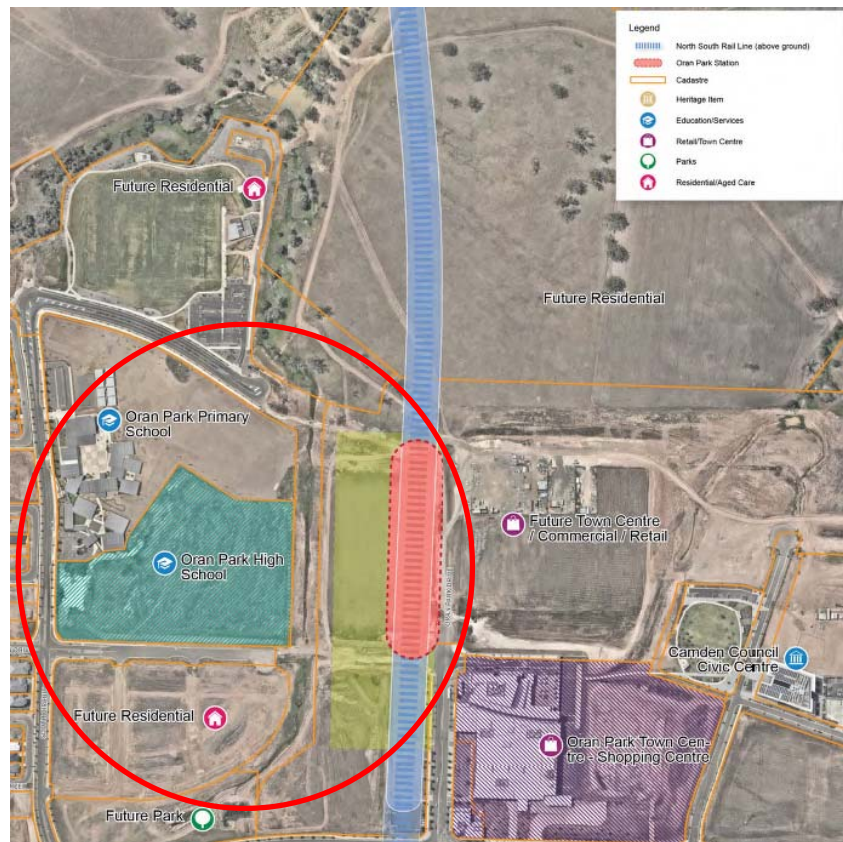
- An objective of a road network strategy for the SWPGA would be to establish a strategic level of integrated land-use and road planning, to guide future detailed planning and design of both the road network and adjoining land-uses. The protection of a public transport corridor for the provision of the NSRL and the extension of the SWRL will have a significant impact on the objectives of the road network strategy. Construction of heavy rail for passenger use will impact on regional and local road-based networks, access to public transport, walking and cycling. These implications highlight a need to determine a robust transport framework for the SWPGA that integrates road and rail.
- Released in December 2013, the NSW Government's strategy 'Sydney's Bus Future' provides a comprehensive plan for Sydney's future bus network, including the SWPGA. However, the NSRL has potential implications for the way in which this bus network strategy was developed, suggesting a need for its review. For example, investigation would be required into Camden LGA suburban routes and how they connect to the rail link, particularly relative to pre-determined bus corridors e.g. previously identified transit boulevard for Rickard Road (to connect the Oran Park and Leppington centres).
- The road network throughout the Camden LGA presents many challenges in providing safe pedestrian movements; however, it also provides opportunities to promote walking, connections to bus stops and other major attractors (retail, community facilities), supported by a rail transport option. Many of the associated issues are reflected in Council's 'Camden Pedestrian Access and Mobility Plan 2014'.
- As construction of the rail line will impact on various road-based networks, the NSRL and SWRL Extension needs to advocate for access to quality public transport infrastructure, promoting integrated outcomes for cycle and pedestrian networks, park and ride facilities, all enshrined in 'Crime Prevention Through Environmental Design' (CPTED) principles.
- As a future major corridor for the future Greater Sydney Commission's 'Western Parkland City', the NSRL and SWRL Extension corridors will present as an excellent opportunity to facilitate effective and efficient transport movement throughout Western Sydney. However, this opportunity need not be limited only to the rail line construction in its final state. There is merit in investigating whether the corridor may be used as an interim measure (i.e. provision of a rapid bus service in the corridor on a temporary basis) by other transport modes. In advance of construction of the entire rail line, such an approach may promote sustainable transport in the SWPGA and the Camden LGA.

Council recommends that Transport for NSW:

- Conduct a review of the SWPGA Road Network Strategy, concurrently with the NSRL and SWRL Extension corridor protection project. A joint approach to these projects will ensure integrated land-use and transport planning outcomes within the Camden LGA.
- Conduct a review of 'Sydney's Bus Future', concurrently with the NSRL and SWRL Extension corridor protection project (and the SWPGA Road Network Strategy), in the context of *Future Transport Strategy 2056*. As previously noted, concurrent strategy reviews will promote integrated land-use and transport planning outcomes within the Camden LGA.
- As part of facilitating improvements in the level of pedestrian access and safety throughout the Camden LGA, work with Council on this issue, as it relates to the future NSRL and SWRL Extension.
- As part of developing concept plans for station precincts and associated infrastructure i.e. pedestrian and cycle networks, actively promote CPTED principles in planning and design for the NSRL and SWRL Extension infrastructure in supporting a positive urban landscape.
- Investigates any options toward interim use of the NSRL and SWRL Extension corridors for complementary transport purposes i.e. to facilitate delivery of multi-use infrastructure, from which a future benefit may be derived.

5. Noise and vibration

- Council acknowledges the planning conducted by Transport for NSW to date, in proposing the provision of part of the future NSRL underground. Notwithstanding, there will still be sections of the rail line either provided 'in cut' or 'at grade', resulting in potential adverse noise and vibration issues associated with the rail line in adjacent areas.
- For example, the image below from page 153 of the *Draft Strategic Environmental Assessment* report depicts the proximity (within the red circle) of the Oran Park School sites to the proposed rail corridor. Sensitive noise receptors such as schools and residential areas are of concern to Council, as to the potential adverse impacts they may be subject to via noise and vibration from the NSRL corridor.



Source: Draft Strategic Environmental Assessment Report (page 153)

Transport for NSW's *Draft Strategic Environmental Assessment* report states the following;

6.4.3.3 Rail noise source mitigation

A full noise and vibration impact assessment would be prepared in future, when the need to build and operate the NSRL is identified. This would allow for the assessment to incorporate the noise source mitigation at the time of development more accurately and to appropriately identify solutions to noise impacts on existing or expected sensitive receivers.

Council questions the timing of preparing a noise and vibration impact assessment; conducting the assessment well after the corridor is protected (i.e. closer to the date of construction) may be too late to impart any worthwhile change to mitigating noise and vibration.

Council recommends that Transport for NSW conducts an expanded noise and vibration impact assessment, with context criteria including;

- The extent of projected noise and vibration impacts anticipated on 'existing' sensitive noise receptors;
- Based on the Structure Plan and precinct planning conducted by the Greater Sydney Commission, project the extent of noise and vibration

- impacts on land adjacent to the future rail corridor, used for residential, schools, commercial etc.; and
- Ensure that the expanded noise and vibration impact assessment quantifies the cumulative impacts associated with other infrastructure-related developments in proximity to the rail corridor, within the Camden LGA and broader Western Sydney e.g. OSO, the Northern Road, WSA etc.

Council recommends that Transport for NSW:

- Conduct an expanded noise and vibration impact assessment for the NSRL, inclusive of assessment of impacts on existing adjacent land-uses (e.g. schools), future urban areas and the cumulative impacts associated with other, transport-oriented infrastructure (i.e. major road/road corridors, 24/7 international airport etc).

6. Visual amenity, built form and urban design

- Council acknowledges in part the amendments made to the NSRL corridor protection, compared to Transport for NSW's 2015 'South West Rail Link Extension Public Transport Corridor Preservation' project; in particular the section between Oran Park and Narellan, through to Macarthur, which is now proposed to be underground (in tunnel).
Council, in its 2015 submission to Transport for NSW, stated:

'In addition to the previous points regarding the Oran Park to Narellan section, it is noteworthy that an underground line is likely to lessen the visible impact it would have to the areas between Oran Park and Narellan (i.e. Harrington Park). If there is a visible rail line then community impact and attitude of who lives over what side of the rail line determines class structures, impact on house prices, threat of anti-social behaviour around visible train lines.'

This point still resonates in that a considerable amount of the NSRL corridor (between Leppington and Oran Park) will be 'at-grade' (i.e. not underground), potentially resulting in some of the adverse planning outcomes previously noted. In this regard, Council recommends that further underground options are explored, where possible, and that appropriate mitigation measures are fully utilised (e.g. construction of extended sections of the rail line in cutting) to limit adverse impacts on visual amenity, built form and urban design.

- Reference is made to the Bringelly Y-junction of the proposed rail line, that is likely to require elevated structures for a rail flyover component. While Transport for NSW's *Draft Strategic Environment Assessment* report states "...consider locating employment and industrial uses in these areas to minimise land-use conflicts..." (page 165) as a means of rationalising mitigation, Council recommends preparation of a visual impact assessment of the proposed scale of the Bringelly Y-junction flyovers, relative to future land-use in the area.
- The ongoing transformative nature of projects such as the NSRL and the SWRL Extension should not be assessed in isolation; rather, its evaluation requires context with a range of other significant infrastructure projects currently planned throughout Western Sydney.



A cumulative visual impact assessment would be beneficial, resulting from elements of the proposed rail corridor being constructed in conjunction with other existing or proposed developments, either associated or separate to it e.g. WSA, OSO, Northern Road upgrade etc.

Future infrastructure elements associated with the rail corridor will be similar in scale, line and form. The potential for any associated cumulative impact between the rail corridor and other proposed infrastructure may be minimised by the visual relationship between the proposed projects, with the potential to form an enhancement and extension to infrastructure rather than being viewed and recognised as a standalone development. Therefore, Council recommends that a holistic assessment is conducted by Transport for NSW to evaluate the cumulative impacts of these large-scale infrastructure projects, as to how they adversely affect visual amenity, built form and urban design in the Camden LGA.



(SWRL – Glenfield flyover)

- Council has previously worked collaboratively with the NSW Government, in particular the Greater Sydney Commission and the Department of Planning & Environment, regarding land-use planning for future land re-zoning in the SWPGA. This work will in part contribute toward the issue of future land-use and its interface with the proposed NSRL, with the intent to develop an integrated approach to transport and land-use planning.

In achieving this outcome, Council recommends a continued collaborative approach, particularly with regard to identifying development density in proximity to future rail station sites, and the possibility of constructing the NSRL in stages consistent with the rezoning/land release process in the SWPGA. The latter point would likely result in a more coordinated provision of infrastructure supporting new development; an issue that is increasingly becoming a focal point of necessity for both the community and government alike.

Council recommends that Transport for NSW:

- Explore further underground options, where possible, and that appropriate mitigation measures are fully utilised (e.g. construction of extended sections of the rail line in cutting) to limit adverse impacts on visual amenity, built form and urban design.
- Prepare visual impact assessment of the proposed scale of the Bringelly Y-junction flyovers, relative to future land-use in the surrounding area.
- Continue a collaborative approach to integrated land-use and transport planning, particularly with regard to identifying development density in proximity to future rail station sites, and the possibility of constructing the NSRL in stages consistent with the rezoning/land release process in the SWPGA.
- Conduct a holistic assessment to evaluate the cumulative impacts of the many large-scale infrastructure projects in Western Sydney, as to how that may adversely affect visual amenity, built form and urban design in the Camden LGA.

7. Soil and water

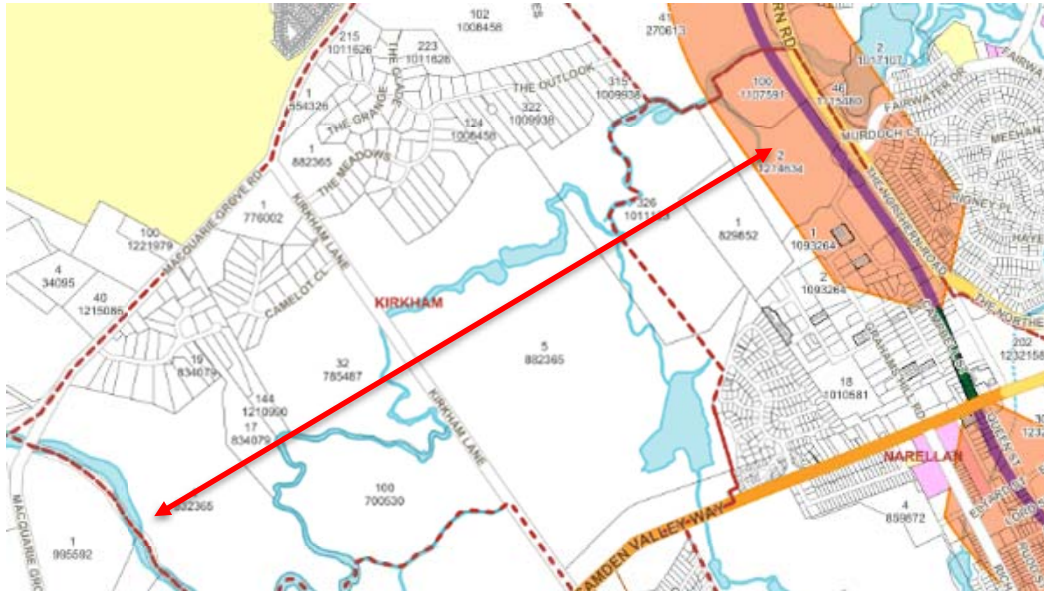
- Transport for NSW's *Draft Strategic Environmental Assessment* report states:

“South of Oran Park, the future NSRL infrastructure would be in tunnel to avoid impacts to surface waters associated with Narellan creek and Harrington Park Lake.

The recommended NSRL and SWRL Extension corridors are separated from the Nepean River and are not expected to result in any detrimental impacts to the river” (page 167).

Council recommends a more robust investigation is conducted by Transport for NSW at the corridor protection phase of this project, to provide greater certainty in support of the aforementioned statements in the report.

For example, the closest point (approximate) between the Nepean River and the NSRL is at Harrington Park, at the point where Narellan Creek links Harrington Park Lake and the Nepean River (as indicated by the red arrow in the map below).



Proximity of a future rail tunnel at this location is less than 3km in distance to the Nepean River, and transcends existing water body connections. Coupled with surface water constraints, it is imperative to have a clearer understanding prior to protecting the corridor of what implications (if any), that tunnelling at the proposed location will have on the Nepean River, Narellan Creek and Harrington Park Lake.

- The recommended corridor traverses several currently un-sewered properties in proximity to the SWRL Extension. During the property acquisition phase of the existing SWRL, several problems were encountered where dwellings became separated from their effluent disposal areas. For example, on Byron Road and Bringelly Road, a number of long parcels of land with a dwelling at the front and effluent disposal area at the rear, have the rail line running through the middle of the property. The acquisition undertaken only included the land that was required for the rail line, leaving the owners with their dwellings at the front of the property and insufficient land for effluent disposal. To reduce the chances of a repeat situation, as part of a land acquisition strategy for the recommended corridor, suitable arrangements should be made by Transport for NSW to ensure there will be sufficient land left for effluent disposal (e.g. larger lots with little impact from the proposed corridor, or farming land-used for dairy/grazing operations).

A conservative estimate of how much undeveloped land would be required for effluent disposal would be in the order of 4,000m². An area of this size will have sufficient space to allow for the required setbacks and buffer distances (from houses, sheds, pools, driveways, adjacent property boundaries, dams,

watercourses and the like), and provide a reserve area should the effluent disposal area fail and a new system need to be installed.

Council recommends that Transport for NSW:

- Conduct a more robust investigation at the corridor protection phase of this project, to provide greater certainty as to the issues noted in this submission e.g. potential adverse impacts to significant rivers, creeks, waterbodies etc.
- In protecting the corridor alignment, and any REF, that Transport for NSW undertakes to determine the impact of the corridor, and that Council is consulted on environmental-related matters in contributing toward the project.

8. Biodiversity and air quality

- Council notes the statements made in the *Draft Strategic Environmental Assessment* report that clearing of native vegetation in the proposed corridor “is predominantly within bio-certified lands where clearing is already approved and does not require detailed assessment or biodiversity offsetting” (page 171). The observation is also noted by Transport for NSW that as part of the proposed NSRL is in tunnel, the result is avoidance of certain areas of biodiversity.



Notwithstanding Transport for NSW’s claimed biodiversity impact mitigation for the NSRL, there remains some issues that were not addressed from the 2015 consultation period. These points are expanded on further, as follows.

- Under the Order to Confer Biodiversity Certification on the *State Environmental Planning Policy (Sydney Region Growth Centres) 2006*, a minimum of 2,000 ha of “Existing Native Vegetation” must be retained and protected within the SWPGA. Where “Existing Native Vegetation” is cleared in non-certified areas for essential infrastructure proposals, such clearing of vegetation must be offset by a range of matters set out in Section 8 of the Order to Confer Biodiversity Certification including demonstration by way of information provided during the public exhibition of a precinct plan. While there is no precinct plan being presented as part of this consultation, Transport for NSW should demonstrate how the loss of Existing Native Vegetation in noncertified areas will be offset.
- In addition to the loss of Existing Native Vegetation, a considerable number of remnant trees outside existing Native Vegetation Areas will be lost, although this has not been quantified.

- Council also notes that the South Creek corridor has been identified within the City Deal as an important environmental spine for the Western City, requiring restoration and protection. Without sufficient detail available in the SEA, Council insists that TfNSW give careful consideration to any possible impacts on this vital part of our region and continues to engage with Council and the community.
- TfNSW's SEA indicates that the proposed NSRL and SWRL Extension corridors and the provision of electrified public transport will result in lower net emissions when compared to the increase in motor vehicle travel which would be expected to occur in the absence of rail corridors. However, further investigation is required via an EIA to confirm and quantify these claimed benefits.

Council recommends that Transport for NSW:

- In protection of the corridor alignment, and through preparation of an REF, that Transport for NSW undertake appropriate studies to determine the impact of the proposed corridor; and that Council and the community is consulted on environmental-related matters in contributing toward the project.
- Consider any possible impacts upon the South Creek corridor which has been identified within the City Deal as an important environmental spine for the Western City, requiring restoration and protection

9. Heritage

- Through identifying the recommended alignment of an NSRL and SWRL Extension corridor, any heritage listed items (as noted in 'Camden Local Environmental Plan 2010', and 'Camden Development Control Plan 2011' (Camden DCP)) should be taken into account.

Examples are noted as follows:

- Oran Park House - the corridor is close to the State Heritage Curtilage and affects the nominated single storey dwellings areas which abut the curtilage, and are planned as a buffer to the curtilage.
- Ben Linden House is a local heritage item at 1311 Camden Valley Way, Narellan. The Narellan railway station will be on the opposite side of the road from this relatively small house. This setting has been compromised by the scale of development in the vicinity and any built structures associated with the future station are unlikely to have any further impact. However, any development associated with the proposed station needs to sensitively manage the interface between the station and the heritage item.
- View corridors of The Northern Rd and Bringelly Rd are identified as Cultural Landscapes in Table B5 of the *Camden DCP 2011* – although these roads are undergoing widening, this matter needs consideration.

- It appears that the heritage items unaffected are: Rossmore School (item 138), Allenby (item 139) and 1186 The Northern Rd (item 2), as referenced in *Camden DCP 2011*.
- The railway corridor and its associated infrastructure, which is approximately 60m wide, has the potential to have significant impact on the settings of the above items. This impact must be considered and mitigated as far as possible.
- Oran Park House forms part of masterplanned precincts for which many heritage reports have been prepared analysing their heritage significance. These should be considered in any assessment.



Oran Park (Source: Office of Environment & Heritage)

Council recommends that Transport for NSW:

- In protecting the corridor alignment, and any preparation of any REF, ensure that Council is consulted on heritage-related matters in contributing toward the project.
- Conduct a desktop analysis of heritage items within/in proximity to the proposed corridors. A significant amount of land within the SWPGA has not been subject to heritage assessments – the issue of heritage should be thoroughly evaluated as part of the determination of the corridors.

10. Social impacts

- As part of the 2015 consultation for the SWRL Extension, Council received numerous representations from the affected community as to their concern with an inadequate consultation process conducted by Transport for NSW. Similar representations have been made again recently to Council, regarding the current corridor protection process.

Council recommends that Transport for NSW maintain an active level of engagement with the community and Council, as to their activities on these projects. Recently there was concurrent release of information regarding corridor protection, along with the *State Infrastructure Strategy 2018-2038*, *Future Transport Strategy 2056*, *Western City District Plan*, the *Greater Sydney Region Plan* etc; while important to promote an integrated planning approach, there is a risk of our community becoming overwhelmed with information. This may be to the point where it is difficult for all stakeholders to adequately process the volumes of data, and consequently provide meaningful feedback.

- The potential adverse social impacts associated with projects such as the NSRL and SWRL Extension (as well as the OSO) were reflected in recent community group activity. In particular, the ‘Outer Sydney Orbital Macarthur Action Group’

established a dialogue forum via social media, that involved the sharing of information, coordination of activism initiatives and advocacy.

One element that emerged from this community action group was a clear picture of the acute social impacts associated with the corridor protection projects. This clearly highlights the community sentiment of the corridor protections proposed, and how it is affecting both individuals and the collective community.

In this regard, further to ongoing active community engagement, Council recommends that Transport for NSW expand its *Draft Strategic Environment Assessment* report for the NSRL and SWRL Extension, to robustly investigate the 'human health' impacts of the corridor protection projects. For example, the Australian Government prepared an extensive report into the anticipated implications for human health resulting from the proposed WSA. A similar initiative by Transport for NSW for the corridor protection projects would be suitably appropriate.

- As noted previously in Council's submission, there are a range of issues that require/warrant the need for an integrated approach between land-use planning and planning for a rail corridor. This also includes potential social impacts.

Without adequate planning, provision of rail within an urban community can literally 'cut-off' or divide groups, creating a disconnect between how people engage with each other and move around their local area. There is even the potential for a social stigma on being on the 'wrong side of the tracks'. Coupled with the potential for atypical anti-social behaviour that can occur in some areas of public transport infrastructure, the provision of rail can result in some social challenges.

Council recommends that Transport for NSW explore these issues in further detail, and in doing so, collaborate with Council and other key stakeholders to achieve positive social outcomes for the Camden LGA.

Council recommends that Transport for NSW:

- Continue to engage with impacted residents, landowners, and Council, in positively promoting good governance for infrastructure planning in NSW.
- Expand its *Draft Strategic Environment Assessment* report for the NSRL and SWRL Extension, to robustly investigate the 'human health' impacts of the corridor protection projects.
- Explore the emerging social issues associated with locating heavy passenger rail in an urban area, and in doing so, collaborate with Council and other key stakeholders to achieve positive social outcomes for the Camden LGA.

Additional Council comments

While this submission is structured to respond to the headline issues as per Transport for NSW's *Draft Strategic Environmental Assessment* report, there are other important issues identified by Council, that merit consideration in the corridor protection process. As a result, following are additional Council comments for the consideration of Transport for NSW, regarding the protection of a corridor for the proposed NSRL and SWRL Extension.

Infrastructure Funding – Special Infrastructure Contribution Levy

- While it is acknowledged that the Western Sydney City Deal will play an integral role in future funding of Western Sydney's rail needs, it remains that much of the funding arrangements for future rail is subject to further investigation and negotiation between the Australian and NSW Governments.

Given the proportional degree of uncertainty regarding future rail funding arrangements, Council recommends that the NSRL and SWRL Extension is included in the NSW Government's *'State Infrastructure Contribution' (SIC) Levy* for the SWPGA.

The ability to capture funding for land and works in the proposed rail corridors as part of the precinct planning process is supported by Council. The Department of Planning and Environment have only recently released the precinct known as 'South Creek West', which will include a significant amount of land that the NSRL will occupy. It would seem both opportune and timely to capture initial earthworks and road connections/bridges for the proposed rail corridor during the current precinct planning phase.