



INNER WEST COUNCIL SUBMISSION ON SYDNEY
METRO CITY & SOUTHWEST SYDENHAM TO
BANKSTOWN ENVIRONMENTAL IMPACT
STATEMENT

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Strategic Context

Whilst Council supports improvements to existing, and the development of new, public transport, there are concerns regarding numerous elements of the project outlined in the EIS; this submission focuses on a wide range of issues, including implications for flooding, heritage, surface transport, biodiversity and urban design.

There is concern that there is insignificant alignment between the project and the Sydenham to Bankstown Urban Renewal Corridor Strategy. The project acknowledges throughout the EIS its role as an enabler to growth along the corridor, but there is insufficient consistency between the project and the Strategy given their collective significance on communities along the length of the corridor. This is expanded upon in the Cumulative Impacts sections of this submission.

Whilst investment in public transport is welcome, disappointment must be relayed with regard to the project not concentrating initially on areas that are currently unserved by public transport. It is acknowledged that some areas of the Chatswood to Sydenham corridor will see new public transport connectivity and that Sydney Metro West is now also in the early planning stages, but nonetheless there are currently vast swathes of Sydney that remain unserved or very poorly served by public transport.

Assessment of strategic alternatives does not adequately explore how other areas that are not currently served by public transport could be served by the project. Any future expansion of the Sydney Metro network should look to service areas not currently serviced by rail (as Sydney Metro West is doing for example) rather than upgrading current services, to ensure an increase in growth in public transport patronage and a reduction in private car dependency.

This assessment also describes the option of retention of existing suburban services and expansion as not being suitable to meet demand, but this is not expanded on to the degree which it can be discounted; an additional harbour crossing and CBD route for the Sydney Trains network for example is not discussed, but would achieve the same outcomes as Metro in terms of removing blockages from City Circle and freeing up capacity.

The project acknowledges that all rail lines will likely see an increase in trip demand in the near future, and that the project has the ability to lead to an increase in capacity on those lines as capacity is freed up from the City Circle lines (e.g. T2 lines); this additional capacity on other lines requires a commitment to rather than a loose intention.

Project Description and Design Development

Design development

The Sydney Metro City & Southwest Sydneyham to Bankstown Design Guidelines (design guidelines) will provide a solid foundation to achieve design excellence along the corridor and alongside the design review process is strongly supported. The establishment of an independent design panel chaired by NSW Government Architect to review at appropriate stages is also strongly supported; it is recommended that the panel additionally incorporate representatives from relevant Councils. It is critical that conditions of approval for the project require the designs achieve the intent of the design guidelines and establish the independent design panel.

Nonetheless, the design guidelines include reference to ensuring local character is included in the station design yet there is concern that the desire for a consistent line-wide identity will make this incompatible. Further discussion is required as to how these potential inconsistencies will be approached in the design stages.

It is concerning that Marrickville and Dulwich Hill town centres are described as 'local' or 'neighbourhood' in regards to sensitivity and the associated minor/moderate adverse impacts from construction and operation of the project. The matrix evaluation reduces the importance of these local situations despite the major impact the project is likely to have on local users and residents.

Further, the matrix dismisses the regularity that views are observed by users and dismisses the value that they contribute to 'place'.

Noise wall impacts are not clearly articulated in the visual impact for the project.

Bicycle rack provision should match not only current demand but enable simple provision for potential expansion in order to cater for likely future demand.

With regard to parapet throw screens and vehicle crash barriers proposed for overbridges, the project provides insufficient detail and there is considerable concern that implementation would be incongruent with the project's public realm objectives. It is essential that such works do not conflict with the aesthetic nature of Marrickville and Dulwich Hill.

Further concerns are raised in relation to the potential for parapet throw screens and vehicle crash barriers to reduce effective footpath widths – any such works must ensure current footpaths widths are maintained or widened.

Security fencing and noise barriers must be designed to be in fitting with their surrounds and aesthetically pleasing.

The project is clear in its role as an enabler and supporter of growth along the corridor. A recurrent issue that occurs with regard to new developments facing rail corridors is the significant restrictions that are placed by Sydney Trains on openings facing rail corridors, which reduces building amenity and overall quality of design. Such heavy restrictions can have significant impact on the ability to create desirable neighbourhoods and is thus unaligned with the enabling objectives of the project. It is recommended that the project works with Sydney Trains to address this issue and remove such obstruction to the delivery of desirable neighbourhoods.

Marrickville Station

Whilst overall the improvements planned for Marrickville Station are welcome, concerns remain with regard to opportunities that are not being maximised:

The project continually outlines its importance as an enabler to growth along the corridor and it has clear objectives to increase the proportion of people travelling via public transport in the vicinity of the project. Thus it is disappointing to see the removal of an earlier proposed second entrance to Marrickville Station, at its eastern end at Victoria Road. This second entrance is also outlined in the Sydenham to Bankstown Urban Renewal Corridor Strategy. In the interests of supporting the proposed land use changes around Leofrene Avenue and Schwebel Street amongst others and encouraging a shift toward greater use of public transport, the creation of a second entrance to Marrickville Station is strongly recommended.

- It should be noted that the secondary entrance does not need to be substantial in size or stature but one that provides direct access to the platforms so as to reduce walking distances and increase the attractiveness of public transport. Given the high level of the tracks at this location, the entrance could be below the current track level rather than above as per most other project designs.

Whilst the minimal area of land to be acquired in Station Street will bring about an improved transport interchange, it will not create a plaza of any significance, as has been identified in the Sydenham to Bankstown Urban Renewal Corridor Strategy. The Strategy outlines that the entire block ideally be converted into a plaza in the interests of bringing about true transformation of the area (incorporating retail pods to ensure the required activation is achieved). This is imperative if increased building scale is to occur around the plaza, as is identified in the Strategy. It is thus recommended that the project take on this responsibility, acquiring the entire block and enabling the development of the plaza, in the interests of achieving alignment between the project and the Strategy given the role of the project as an enabler for growth.

Council supports the proposed conversion of Station Street to a shared zone, however it should be noted that Council had proposed this following the recent (TAP) upgrade to Marrickville Station but the proposal was not supported by the RMS.

The proposed signalisation of the Illawarra/Schwebel/Warburton intersection is also supported. It should be noted that Council previously conducted a study into providing signals at this intersection and found that maintaining the existing mid-block signals on the crest of the Illawarra Road Bridge works more efficiently than replacing these signals with a marked foot crossing. Thus the retention of the existing signalised crossing on the crest of the bridge is recommended in addition to the installation of new signals at the Illawarra/Schwebel/Warburton intersection.

It should also be noted that the proposed location of the new pedestrian crossing on Illawarra Road at Arthur Street is likely to be too close to the crest of the bridge and as such may not meet relevant standards with regard to sight lines. The project must be required to model these proposed changes to ensure that network efficiency is maintained whilst ensuring that pedestrian safety is enhanced.

Further to the proposed signal changes, the project should extend the 40km/hr speed limit (currently operating on Marrickville Road and Illawarra Road to the north of Marrickville Station) around this high pedestrian activity area.

The area around Marrickville Station is lacking in trees; any tree removals will have a significant impact on the existing sense of place. Existing trees must be retained and protected. Any tree removal must be replaced with advanced specimens of the same size.

With regard to the proposed replacement of the Illawarra Road Bridge, currently there is a cycle route along the Illawarra Road Bridge but the width of the bridge is too narrow at present to cater for both a bus stop and cycle route and as such the bridge becomes a pinch point for cyclists. In order to provide a safer cycle route and safer access to the bicycle parking at the station, the bridge will need to be widened as it is replaced. It is thus strongly recommended that the new Illawarra Road Bridge be built so that it is sufficiently wide enough to facilitate north-south separated bicycle connections along Illawarra Road.

Closure of the Illawarra Road Bridge during construction would have major impacts to the local street network for pedestrians, cyclists and vehicle users. It is recommended that further assessment of these impacts be undertaken. It is also recommended that pedestrian movement across the bridge be permitted during construction wherever possible.

Regarding the proposed replacement of the Albermarle Street Bridge, this bridge should be widened as part of the project to include a 2m wide footpath on either side of the bridge. Traffic lanes should also be widened sufficiently to 3.5m in each direction.

Measures should be introduced to minimise the impact of construction truck traffic into McNeilly Park from Jersey Street (construction site access), particularly given that this is a busy pedestrian route for those accessing the park, including young children, and an active cycle route. The intersection of Jersey Street and Livingstone Road should be further examined as to the safety of truck turning movements.

The active transport corridor must be delivered by the project further to the west than indicated at present, through to Dulwich Hill Station and further to the east through to Sydenham Station.

- The existing cycle route along the rail corridor between Station Street and Victoria Road/Myrtle Street is a direct segment of Council's regional bicycle route. Rerouting of this cycle route provides a more circuitous route from the station to Myrtle Street, does not comply with user hierarchy intent, and would be a downgrade from the connectivity that exists at present; it is therefore not recommended. The project suggests enhancement of the existing footpath, which is supported, but it is recommended that the cycle route be incorporated in this section rather than taking an on-road route.
- There may also be opportunity to widen this path by minimising the landscape area between the Platform 2 and the path or use of vertical landscape elements as part of fence elements for space efficiency – while still maintaining visual surveillance for safety.
- The active transport corridor on-road alternative via Meeks Road to the east of Charlotte Street/Victoria Road is not supported. It is recommended that a foot/cycle connection be provided across Victoria Road (given the difficulties with achieving safe access across Meeks Road at grade) to enable connectivity to the intended active transport route through Fraser Park to Sydenham Station.
- The designs must be amended to include a superior active transport corridor route via Fraser Park and the land to the south of Fraser Park (via new proposed tunnel under the railway line) which will provide an optimal level of connectivity.

- Whilst the newly proposed active transport connection under the newly constructed Illawarra Road Bridge is acknowledged, it should be noted that the main east-west cycle route would thus not travel via Warburton Road (as shown in the Marrickville Station layout).

Dulwich Hill Station

Consistent with the heritage objectives of the project and the design guidelines that aim to retain the unique character of the existing place, the existing overhead booking office must be retained and repurposed. Given that there is only limited retail activation fronting the new plaza (to the front of the proposed new station entrance), consideration of repurposing the booking office could complement significantly to its (retail) activation.

The project must ensure consistency and integration with Council's draft public domain master plan for the Dulwich Hill Station Centre.

The scope should include new signalisation of the Wardell/Dudley intersection (to the south of the railway bridge) to facilitate improved pedestrian crossing, including direct pedestrian crossing routes from both the north and south sides of Dudley Street to the new station entrance plaza as well as that across the entrance of Dudley Street; this would provide the safest, highest amenity option, given the awkward configuration and challenging grades at this location. This would also provide safe pedestrian connection between Metro/Light Rail and bus interchange.

Consideration must also be given to the intersection of Bedford Crescent/Wardell Road from the perspective of improving north/south pedestrian movement.

Seamless integration of the upper and lower plaza areas on the south side of the station must be achieved with regard to the following:

- Dropping levels to Ewart Lane and stair connections in a constricted area
- Creation of the best design solution to meet the identified activity levels
- Allowing for easy movement of all users
- Maximising safety, being cognisant of the new station entrance no longer directly fronting onto Wardell Road
- Accommodation of pedestrian and cycle movements around the plaza and concourse areas

Further, the design of the western stairs and interaction with retail activity under the concourse may cause congested circulation – circulation could be enhanced by pushing back the retail front from the concourse overhang to create a greater circulation area.

Footpaths must be provided on both sides of Ewart Lane (as per Council's draft public domain master plan for the Dulwich Hill Station Centre), given the anticipated numbers of pedestrian existing the station and the substantial development that could occur in the adjacent block between Ewart Street and Ewart Lane as a result of the changes proposed in the Sydenham to Bankstown Urban Renewal Corridor Strategy.

There is opportunity to further improve the visual and pedestrian amenity qualities along Ewart Lane – the introduction of tree planting and shade with improved pedestrian pavements is

recommended, alongside the installation of a new shared zone in Ewart Lane (north-south section).

The footpath on the western side of Wardell Road across the railway bridge should be widened, given the existing narrow width and the anticipated additional numbers of pedestrians in the vicinity of the new station entrance. This is the sole opportunity to create such an improvement and not addressing this issue would be inconsistent with the project design guidelines regarding enhanced customer circulation, customer safety, accessibility, connectivity (specifically mentioning cross-corridor connectivity) and pedestrian movement.

The reconfigured commuter car parking area appears to now cover an existing area of significant trees, which is not supported and must be redesigned.

The area around Dulwich Hill Station is lacking in trees; any removals will have a significant impact on the sense of place and pedestrian amenity. Extensive community engagement recently completed for Council's Dulwich Hill Station Centre public domain master plan identified the greening of the precinct with trees and vegetation as a key request by the community. Resultantly, existing trees must be retained and protected; any tree removal must be replaced with advanced specimens of the same size.

Expansion of the rail corridor to the south must not impact the existing remnant Sydney Turpentine – Ironbark grassland that exists on the existing embankment parallel to Dudley Street.

The impact of excavation works for underground/covered flood attenuation basins (between School Parade and Dudley Street and Ewart Street) is not explained thoroughly with regard to the impacts this may cause to existing trees and streetscape; temporary works must not negatively impact the street environment and an alternative solution must be found if negative impacts are anticipated.

In relation to car parking, the figures are misleading – table 8.3 states a loss of 10 car parking spaces; table 11.6 states a loss of 5 car parking spaces. In fact the total is 15 as the former 10 are as a result of new kerbside facilities and the latter 5 as a result of reconfiguration of the existing car park to the south of the station. The project must be required to present a proposal for Dulwich Hill station in which there is no net parking loss.

The bus stop proposed to be retained (outside of the new plaza) on Wardell Road is unnecessary and should be removed – bus stops are to remain in Dudley Street in both directions.

The active transport corridor configuration around the station and as it heads west from the station should ensure adequate width is provided to serve both pedestrians and cycles, particularly in light of the large numbers of pedestrians expected to be exiting the station and in the interests of avoiding conflict between different users. The project design needs to resolve how to best overcome these design challenges and ensure that the public domain objectives of the project and Council are integrated.

The active transport corridor should be delivered further west through to Hurlstone Park station and further east through to Marrickville Station.

Active Transport Corridor

The EIS notes that:

- the population of the IWC contains a higher proportion of active transport users than Greater Sydney as a whole
- community feedback indicates that Inner West residents value “connected and accessible infrastructure, which supports walking, cycling, and public transport usage” including accessible railway stations, bus stops, well connected footpaths and cycle routes
- TfNSW and DPE support the development of an active transport corridor along the project alignment, including walking and cycling infrastructure

It is thus incongruent that the project makes only “provision for an active transport corridor at stations”, rather than its development across the project alignment.

The revised Sydenham to Bankstown Urban Renewal Corridor Strategy is clear in its intent to enable the realisation of a linear park along the corridor, for which the active transport corridor is the backbone. Furthermore, the recently released draft Greater Sydney Plan and draft District Plans clearly articulate the importance of achieving the Green Grid, which this corridor would contribute significantly toward.

Designing and delivering such a facility, adjacent to a rail corridor, is likely to be complex and require the partnership of numerous organisations, but to succeed it is crucial that it be funded and delivered by the project as a single entity with timely delivery in conjunction with the other elements of the project.

The project must therefore be conditioned to deliver an active transport corridor along its entire length, to be constructed concurrently with the project itself.

Open Space

The significant impact on Fraser Park and McNeilly Park cannot be dismissed due to the scarcity of open space and recreational facilities in the Inner West.

The impact on the relatively small size of the dog off-leash area at McNeilly Park (noting that walking the dog is the 2nd most popular recreation activity in the area) is likely to be significant.

There is an opportunity for the project to enhance specific parks and places as sites for future community infrastructure, amenity and community activation and contribute community infrastructure where there will be loss of open space or amenity during or beyond construction.

McNeilly Park will be significantly affected during the construction period – significant upgrade of the park should be made by the project upon completion of the works taking place in the park (not just replacement of existing condition) given the prolonged period of impact; upgrades should be in accordance with relevant Council plans.

Any proposed works in open space areas must have pre-condition reports undertaken prior to the commencement of such works, in order that reinstatement is undertaken to satisfactory standards.

Traffic, Transport and Access

Council has grave concerns regarding the traffic impacts of the project, both during the overall construction period and during railway shut-down periods, including the potential for rat-running in local streets.

Bridge Works

Full and partial bridge closures should only occur on the weekends or night works where possible.

Table 10.36 – Charlotte Street underbridge be accurately renamed in documentation to Victoria Road underbridge. It must be noted that height restrictions apply to this bridge; engagement regarding these height restrictions and alternative routes that can be used is recommended, through media, mail and notices on the road. Night or weekend works preferable if a full road closure is proposed, with works undertaken outside of peak hour during partial closures.

Diversion of any buses (noting that STA buses do not serve this part of Victoria Road) should be via Livingstone Road. Closure of Albermarle Street Bridge should divert traffic to use Wardell Road or Livingstone Road overbridges.

Table 10.37 – Deliveries are to be made out of peak times.

10.4.4. – The potential impact to the Wardell Road overbridge (if any) needs to be discussed further between Council and the project. Where the predicted level of service is F, strategies to advise motorists of potential lengthy delays should be devised and implemented during construction.

Temporary Transport Strategy

Additional detail is required on the Temporary Transport Strategy and Plans for each of the planned closures of the line, including the proposed use of any temporary bus stops prior to commencement. Details must also be provided on the loss of parking around stations as a result of the use of additional buses during rail closure periods. Details must also be provided on the stakeholder engagement strategy for the implementation of any Temporary Transport Plan. The project must also publicly exhibit each Temporary Transport Plan prior to any railway line shut-down.

There is concern regarding the significant impact that the TTS will have on local roads – on rail passengers forced to change modes, on existing bus passengers, as well as on pedestrians and cyclists as local streets become more congested.

The project must undertake traffic modelling with regard to the impact on local streets from construction traffic and from rail replacement TTS services, given the significant impact that both will have on local streets.

Station and Corridor Works

Details are required on affected bus stops including any that may need to be relocated and the estimated duration. If relocation affects Council bus shelters then alternative arrangements will need to be made with Council and the bus shelter provider to relocate the shelter at zero cost to Council.

Changes to car parking

Council has introduced Resident Parking Schemes in the Dulwich Hill and Marrickville Station precincts. Any loss in unrestricted parking as a result of the project would place further pressure on remaining spaces in local streets. More information is required on exactly where parking is proposed to be removed and the duration for this for all stations.

Car parking for project workers must be provided within site compounds or within rail land to minimise impacts on remaining on-street unrestricted parking spaces. Given that the majority of project workers will likely use motor vehicles to travel to the site, provision needs to be made within the construction compound area to accommodate for the expected workforce in order to prevent additional pressure on nearby Council residential streets.

A plan outlining and quantifying temporary and permanent parking losses for Marrickville and Dulwich Hill Stations is required. The project must undertake stakeholder engagement to inform residents, businesses, emergency services and others as to the changes in parking, providing clear plans indicating where parking changes are to occur prior to implementing the changes.

Given that Inner West residents are impacted by parking more so than other outer lying areas, the project should work to ensure that there is no net loss in parking within the Inner West LGA as a result of the proposals and that attempts are made to retain scarce parking around stations.

Residents and businesses within the surrounding area of proposed parking changes will need to be consulted in relation to the loss of spaces and duration of the parking loss. The project should investigate whether measures can be undertaken to minimise the impact on parking loss.

It is recommended that the project, in conjunction with Council, deliver a parking management plan for the corridor and that the project fund a specific amount of money for any subsequent implementation from such management plan in order to control parking impacts.

Special Event management

Council has a number of special events throughout the year including the Marrickville festival along Illawarra Road/Marrickville Road and Easter celebrations affecting Livingstone Road. These need to be considered in the planning stages and potential impacts taken into account.

Baseline conditions (11.3.1)

Given the likelihood of significant development occurring along the corridor as a result of implications from the Sydenham to Bankstown Urban Renewal Corridor Strategy, baseline conditions cannot discount this and must consider such potential development to ensure a more accurate picture of the time when the project commences construction

Noise and Vibration

There is concern with regard to the significant number of sleep disturbances that the project is expected to result in – almost 1,000 exceedances in Marrickville alone. Alternative accommodation or noise insulation should be provided for people affected by night time works, particularly given the time length of the project; the qualification criteria for alternative accommodation of 30 decibels above the relevant noise criteria should be readdressed.

Residents continually affected by vibration and/or noise should also be appropriately recompensed.

It is noted that 24 hour works would likely be undertaken at times, including the use of noise-intensive machinery; Council is keen to ensure that night works are minimised and conditions of approval and environmental protection licenses are appropriately stringent. It is recommended that no works be undertaken after 10pm or before 7am.

Further, a more detailed framework for the Out of Hours Strategy should be developed than that which has been included in the EIS.

Council also recommends pre-condition reports be undertaken by the project on all properties within the vicinity of the rail corridor that may be at risk of vibration and/or potential structural damage as a result of vibration derived from the construction works.

A corridor-specific construction noise and vibration strategy should also be prepared.

Consideration must also be given to the noise and vibration impacts that are likely to occur as a result of associated utility works that will be required as part of the project; these are currently not considered within the EIS as they are considered separate to the project but must be taken into account now. Council seeks improved co-ordination of project-related utilities works to reduce cumulative construction impacts.

Council is keen to ensure that lessons learned from earlier stages of Sydney Metro in relation to management of construction impacts result in significant improvements for the Sydneyham to Bankstown stage.

It is recommended that a study of the health effects of construction impacts on residents from earlier stages of Sydney Metro be carried out to inform the Sydneyham to Bankstown stage.

Council recommends the project be required to ensure improved co-ordination between State agencies and improved complaints procedures in relation to construction activities.

Council requests that the project be required to increase resources for compliance monitoring.

Council requests that an assessment is carried out on the cumulative noise impacts from overlapping noise envelopes

There is a need to improve noise monitoring and to account for the nature of noise impacts levels.

There is a need to include vibration in the required assessment of cumulative construction impacts.

Non Aboriginal Heritage

The main problem with what is proposed in the EIS with regard to non-aboriginal heritage is the lack of detail – it is generalist and generic; drawings are very high level with no details on how heritage components and objects have been evaluated, how junctions will be resolved between old and new, or how retained fabric will be ‘modified’ and to what degree and precisely where.

A high degree of trust is expected for the next stage of the project to resolve these issues satisfactorily. Detailed drawings of demolition and construction (where there is a heritage interface) should have been provided at the EIS stage in order to explain the true impact. There is no drawing showing the location/dimension/interface of any old or new structures. There are no details of the proposed works other than footprints of platforms and retained/proposed buildings, with no information on the detail, scale or location of awnings, ticket booths and other structures/furniture.

The only plans (in the IWC area) provided are: Figs. 8.2 and 8.4 – merely block diagrams showing broad intent on operational demarcations (paid and unpaid concourse) and Fig. 14.2 showing intent to save, alter or demolish, without detail on heritage fabric assessment, salvage, construction or demolition. What specific fabric will be retained/demolished at a more detailed scale and how will the fabric be ‘disposed’/treated? What are the opportunities to retain components?

The only document which describes the extent of demolition uses written descriptions - table 14.7. The written description of works is typically vague and general across all sites and relies on trust, rather than specification, for the outcome e.g.: *“additions to the building and platform would be designed to be sympathetic to the heritage context and minimise impacts”*.

Written description alone is an imprecise and ambiguous method of communicating the proposed scope of works e.g.: *“major impact on the original platform including the loss of about half of its fabric and brick face from the demolition eastward of the central platform building”*. Further, Fig 8.2 contradicts this indicating that a section of the platform east of the central platform building is to be retained.

Visual impacts are considered by the EIS to be “major” due to the visual clutter and scale of intervention e.g. *“overall, the proposed platform canopies and platform building would have a major visual impact on the character and setting of the Marrickville Railway Group”*, however this is difficult to interrogate because there are no drawings of the precise location, interface, materials, or size of canopies or other structures.

Consequently there is little on which to comment, other than to say there is too little documentation on the specific detail of the impact of the project to be able to make informed comments about the potential scale of the impact, and opportunities for mitigation. Whilst the impacts on heritage are significant, mitigation outcomes are yet to be communicated by the project. It is not the ideal process for consultation as the quality of outcomes relies on the quality of detail and design decisions, and it seems there will not be an opportunity to comment on those.

Nonetheless, there is grave concern with regard to the heritage impacts on Dulwich Hill Station and the surrounding village as a whole. With specific regard to the proposed removal of the Dulwich Hill overhead booking office, the EIS states (7.9) that the *“primary quality of the corridor is the*

heritage fabric of the rail line itself", which is incongruent with this proposed removal. In addition, it must be pointed out that the building is a key part of the journey along Wardell Road and adds significantly to the Dulwich Hill Station sense of place; its removal would therefore not result in a *"minor beneficial benefit visual impact"* as the EIS suggests. Furthermore, the State Heritage Inventory Database provides the following statement of significance on this matter: *"the overhead booking office is of high significance and rare as it retains its original configuration and much of its original fabric"*. Demolition of the Dulwich Hill overhead booking office is therefore not supported and must be retained.

Recommendations:

- The Dulwich Hill Station overhead booking office be preserved and incorporated into the design of the new station.
- Prior to any consent being awarded, the issue of, and consideration for community comments, detailed drawings of demolition and construction (floor plans, cross-sections, elevations, roof plans, canopies, furniture, buildings and platform details explaining the extent of the works) at a recognised scale at A3 that enables the assessment of design details of all stations be prepared and provided to Council to enable the proper assessment of the heritage impacts and design merits of the proposal.
- The Mitigation Measures (Table 14.36 and 15.3) are supported with the addition of the following two measures:
 - o NAH8 does not go far enough. Salvage of all materials removed from demolished and modified heritage items should be required by a condition of consent; not only fabric of high and exceptional significance should be salvaged.
 - o A Heritage Salvage, Reuse and Distribution Strategy should be required by a condition of consent (refer New M5 Strategy Heritage Salvage and Reuse Strategy for recent example).
- Interpretation Plan should be integrated with the Heritage Salvage Strategy to promote the utilisation of salvaged fabric as a condition of consent and include reuse of salvaged materials within the project.
- Clarification is sought with regard to the rationale to demolish Dulwich Hill platform one/two. It is recommended that an alternative solution to preserve and modify the platform be considered to reduce the major heritage impact that would be caused by the proposed demolition.
- Visual impacts appear to be referenced but not addressed (e.g. Marrickville Station stated as having a major impact). It is recommended that visual analysis based on 3D models from several viewpoints be prepared and provided to Council to enable the proper assessment of the visual impacts of the platform canopies and building on the character and setting of the Marrickville Railway Group and the Dulwich Hill Railway Group.

Socio-economic Impacts

Whilst it is acknowledged that any subsequent changes to land zoning are matters that are currently being considered by the draft Sydenham to Bankstown Urban Renewal Corridor Strategy, nonetheless the project makes regular reference to the (employment) opportunities that local communities will have as a result of improved public transport access. Resultantly, it is critical that if new housing is to be built and clustered around these new stations with full accessibility, that such housing also needs to be built to at least a Liveable (silver) level standard. Otherwise given the extremely low (almost non-existent) existing stock levels of adaptable or any liveable designed dwellings for people who require the full accessibility of the station will be forced to live further away from the stations with the best access. This must be recognised in both the project documentation and in the Sydenham to Bankstown Urban Renewal Corridor Strategy. Furthermore, it is recognised that all the best and easiest places to live close to accessible stations are being built out by new developments that preclude them as they are (i) not accessible and (ii) not affordable. The result is that people with a disability and their families move further away from rail lines and increase their reliance on cars or taxis. As with other disadvantaged people this compounds the disadvantage, increases their costs and reduces their competitiveness in the labour market, who may have a bias toward those living closer to city-based jobs and in proximity to fast public transport. This indirect consequence of the project has not been addressed in either the EIS or the Sydenham to Bankstown Urban Renewal Corridor Strategy.

Connecting communities by supporting sustainable movement between destinations

The project commitment to an active transport corridor must involve its delivery along the entirety of the corridor, not just adjacent to the stations.

The preparation of a Temporary Transport Strategy is supported and should be prepared in consultation with Council staff and with reference to the IWC Inclusion Action Plan to minimise disruption from construction activities. The temporary transport arrangements with buses replacing trains will create access difficulties. This is largely because buses are only required to have two wheelchair accessible spaces per bus and there is a large pool of potential users competing for these spaces, including people who may be pregnant, have prams, older people, or others who may require such space.

The role of stations as community places with future social, cultural and economic opportunities is significant. The proximity of each station to existing open spaces and community facilities provides potential to enhance each station as a community hub or village green. The stations can reflect local distinctiveness, activate late night economies, enhance safety and promote social interaction. The project should be requested to act on this opportunity to collaborate with local communities and Councils to create hubs for community activities, recreation, urban food growing and cultural programs that connect residential areas, open space and businesses together to create vibrant and attractive destinations.

The inclusion of a network of walking and cycle paths could be enhanced by public art and way finding features that identify and explore the distinctive environments and cultures of each precinct, which the project should take into account. Including signage, names and stories in consultation with the Aboriginal Community could enhance these links in the 'The Sydney Language', as

referred to and sourced from Dr Jakelin Troy's document "*The Sydney Language*" as endorsed by the Metropolitan Aboriginal Lands Council.

With regard to the project developing a creative arts strategy for the corridor, Council's Living Arts group should be consulted in the development of this strategy and should include (amongst other things) consideration of legal street art walls especially in areas where there have been high levels of artists displaced by the project and other associated projects.

Health & wellbeing

The noise and other risks to amenity may reduce both visitor satisfaction and visitation to affected parks, which in turn may negatively impact on mental and physical health and wellbeing. The construction phase of the project is estimated to negatively impact upon many open spaces including McNeilly Park and Jack Shanahan Park. There is an opportunity for the project to enhance specific parks and places as sites for future community infrastructure, amenity and community activation and contribute community infrastructure particularly where there is loss of open space and amenity during and beyond construction.

McNeilly Park will be significantly affected during the construction period – upgrade of the park should be made by the project upon completion of the works taking place in the park (not just replacement of existing condition) given the prolonged period of impact; upgrades should be in accordance with relevant Council plans.

Potential for improved health and safety as a result of the project is noted however cumulative impacts of adjacent developments that will be initiated by virtue of the project may require significant mitigation to protect safety, health and wellbeing at the local level.

Cultural displacement

The project, alongside DPE and Councils, should work with the community to identify a clear plan to find new spaces for displaced cultural organisations and creative practitioners resulting from potential rezoning changes set out in the Sydenham to Bankstown Urban Renewal Corridor Strategy. This may include building on the networks of cultural enterprises to create purpose built infrastructure to ensure their viable contribution to the corridor and its residents as well as those in Greater Sydney.

Accessibility

The design guidelines pick up broad aspects of universal access, which is welcomed and provides confidence that compliance will be achievable along the corridor. The realisation of best practice, however, is a little harder to gauge. For example, with respect to comprehensive design approaches, it is less clear how well access issues for people with cognitive, sight/vision impairment will be addressed. Extensive use of glass, reflective surfaces combined with lighting (natural and added) may serve many aesthetic and environmental performance goals but could also present a very confusing array of glare or abstract shadowing. These approaches need to give attention to orientation effects for those with low vision and different sight conditions, including

those that rely on levels of audio prompt/echo etc. for orientation. If it has not occurred already, the current designs should be peer reviewed by professionals and representative groups that possess expertise across a broad range of accessibility needs.

It is important to ensure there is compatibility of travel needs where bikes are allowed on Metro carriages. If people travel with their bike and the system permits users to enter all carriages it may result in people with less mobility being obstructed when entering/leaving the train or negotiating movement to/from the designated mobility areas. Further thought is therefore required as to the appropriate designation of dedicated space for bikes as it is for others that require specific space on board trains.

Public education and reinforcement of key travel and behaviour requirements is recommended as part of the ongoing operational processes, to enable everyone to have fair and safe access and journeys.

Clarity is also sought on service standard and relevant procedures should lifts become out of service.

Ticketing

The issue of ticketing that is both affordable and priced to encourage commuters to use trains rather than cars is significant. It is acknowledged that the EIS outlines that Opal ticketing will work on Sydney Metro and that fares will be set on the same basis as for Sydney Trains and controlled by the NSW Government.

It is also noted that the *Sydney Metro City & Southwest Business Case (2016)* stated the annual incremental public transport fare revenue would cover nearly 61% of the incremental operating cost in 2026 and more than the operating cost in 2036, and the additional fare revenue on Sydney Metro services would more than cover the incremental operating costs of these services (net profit of \$(redacted) in 2026 and \$(redacted) in 2036).

The ticketing information relating to the above has been redacted from the Business Case so it is unclear if the ticketing policy will conform with existing ticketing determination, which entails some reference to social impacts, or whether it will be primarily geared to ensuring an operating profit for the private operator of the network. Clarification on this matter is sought. Council states its opposition to the privatisation of the Bankstown Line as part of the Sydney Metro project.

Property

Impact on Surrounding Land Uses

With the forecasted construction of approximately 8,000 additional dwellings and arrival of 830 new employees surrounding Marrickville and Dulwich Hill Stations by 2036 as a direct result of the project in conjunction with land use changes proposed in the Sydenham to Bankstown Urban Renewal Corridor Strategy, the need to prioritise clear and achievable strategies for the delivery of sufficient open space (parks), other community facilities (community halls, libraries etc) and infrastructure to support the significant increase in residential and commercial development/population and workforce must be addressed now. The project continually refers to itself as an enabler and supporter of growth and as such cannot relinquish responsibility within this realm.

Residual lands

Should any project approval include conditions to offer land for dedication purposes to Council, Council will require the land to be remediated in line with the standards of the intended use. Council recommends the land parcels offered for dedication be useable (suitable) and accessible i.e. linear strips of land adjacent to a rail corridor are considered challenging from a usability, operational and maintenance perspective.

Temporary Compound Sites and Work Zones

It will be necessary to provide Council with a minimum notice period of 28 days prior to temporary site establishment/commencement date of a lease, should the project request to lease Council's land, in order to provide sufficient time to negotiate, draft, review, amend as necessary and execute a lease/access agreement. In such circumstances Council will require an appropriate bond or bank guarantee to be paid in advance of the commencement of a lease/access. Rent in line with market rental values will be payable to Council for any proposed land to be leased. In addition, Council will require copies of relevant insurances, site plans, SWMS, pre-condition reports, etc during the notice period. Council is open to collaborating with the project in an effort to encourage the return of the leased land and infrastructure into Council's possession in a superior standard.

Impact Assessment

16.4: How potential impacts have been avoided or minimised: Council recommends that the project adopts measures to design the project in a manner that would minimise the potential need to acquire or lease public land.

Aboriginal Heritage

Recommendations:

Inner West Council Community Development Workers and Strategic Reference Group (or alternative) be provided with an opportunity to be consulted, as no advice was received as per the suggestion in section 15.1.3.

Council requests that further details be provided in regards to the Archaeological assessment that determined the significance of sites as stated in table 15.2.

Council requests further details be provided in regards to section 15.4.1 and table 15.3 specifically regarding construction, accidental identification of potentially significant/significant sites and the excavation procedures.

Council requests further details on the interpretation project advised in table 15.3 section AH4.

Business Impacts

The impact of construction on access to stations and shops generally, especially for the elderly and people with disabilities, must be addressed by the project.

The closure of the bridge in Illawarra Road will be a major concern with traffic being diverted through residential areas (that may have extensive traffic calming) that would significantly increase travel times. The closure would also result in the Marrickville CBD being bisected, with the main supermarket (Woolworths) being cut off for shoppers coming from the north; this makes the decision to shop elsewhere more likely in this area. Impacts on local business have not been adequately assessed but must be undertaken by the project.

Whilst it is acknowledged that construction activities have the potential to result in increased trade for local businesses, it must also be appreciated that these benefits will be offset by the likely deleterious impact on traffic and parking that will see regular customers choose to shop elsewhere. It is thus more likely that there will be an overall negative impact on trading levels, which has not been assessed but must be undertaken by the project.

The impact on businesses as a result of the TTS (e.g. customers no longer passing through the station locality) has also not been assessed and must be undertaken by the project.

More detail is required around the nature and extent of support referred to under the Small Business Owners Support Program.

The EIS indicates that between 700 and 1700 jobs would be created by the project. However, any benefit to the local workforce would be minimal as the local demographics clearly evidence an extremely low percentage of personnel engaged in the construction industry. Given that the new employment opportunities would be minimal, the provision of training and acquisition of new skills is also likely to be of very limited benefit to locals. The Workforce Development and Industry Participation Strategy which has been developed for Sydney Metro would also be of minimal benefit for the local workforce. The objectives of the proposed Strategy, whilst well-meaning, have little or no application to the workforce profile in the Inner West LGA.

Landscape

Concern is raised at the extent of tree removals throughout the project. The EIS suggests that tree removal *will be avoided if possible*, which is an empty statement. Greater importance needs to be placed on existing trees in the landscape – they are vital green assets and provide essential functions in the urban environment. Significant/established trees should be retained and considered as constraints in the design process, not just retained ‘if possible’. Best practice urban forest management is not just about planting new trees it is about retaining and protecting existing valuable canopy trees within the landscape. It takes decades to establish good canopy cover.

The 1:2 replacement ratio is supported, however close attention should be given to how and where these replacements are installed. They should be replaced in the same or as close to the same location as where they were removed; this is to ensure that the canopy and shade benefits provided by the tree(s) are retained in the area. Planting detail and specification will need to consider technologies such as structural soil and vault systems. Replacing trees in dense urban centres is becoming increasingly difficult due to confined space and especially soil volumes. If these replacement trees are to be viable replacements they need to be planted in conditions that will allow them to thrive.

Council should be consulted with during the detailed design of the tree planting documentation.

Tree Impact Assessment Reports and Tree Protection Plans are to be prepared for ALL trees impacted by the project. If the trees being impacted are Council owned assets, these reports are to be provided to Council in a 90% draft form for approval prior to finalising.

The “*Tree Management Strategy*” referred to in the EIS should be prepared in consultation with Council.

Specific concern is raised with regard to the proposed reconfiguration of the Dulwich Hill Station commuter car parking area as this appears to cover an existing area of significant trees, which is unsupported and must be amended.

Council is also concerned with regard to the proposed significant loss of vegetation along the corridor – this is addressed further in the relevant section later in this submission.

Hydrology, Flooding and Water Quality

The information provided in the EIS in relation to flooding is scant and lacks specific detail as to the measures being proposed to be implemented to address flood mitigation in the Inner West LGA. Although the following works (listed below) are proposed in the vicinity of Marrickville Station, to improve collection and conveyance of stormwater runoff, there is no specific detail provided. This detail will need to be submitted to Council at the concept design stage for Council's review and comment before designs are finalised.

- 8,000 metres cubed underground detention basin system in McNeilly Park.
- New trafficable grated inlet drains in Hollands Avenue and Livingstone Road.
- Trafficable grated inlet drains in Livingstone Road and Marrickville Avenue.
- New large diameter (1350 millimetre to 1650 millimetre) buried trunk stormwater system in Livingstone Road and Marrickville Avenue.
- Inlet stormwater chamber in Marrickville Avenue adjacent to the rail corridor boundary.
- New trafficable drains adjacent to Illawarra Road and parallel to Marrickville Station platforms.
- New drainage culverts to convey flows beneath the Marrickville Station platform.
- A series of new large stormwater drainage pipes in Station Street, conveying flows towards McNeilly Park.

In addition to the above proposed works, numerous other amendments to track drainage and cross drainage are also proposed at key locations, but again no specific details are provided.

Although the drainage changes and improvement works may provide good outcomes, without seeing the drainage concept design details Council cannot provide meaningful comments. Therefore it is imperative that once concept designs are prepared they are submitted to Council for review, at which point comments can be provided so that these can be incorporated in the final designs.

Major areas of concern

Outside the Marrickville Valley, i.e. around Dulwich Hill Station, there are no flood modelling results shown in the EIS reports. This would suggest that any modelling undertaken was 1D modelling, if at all. For a project of this magnitude and importance this is unacceptable as it cannot adequately characterise flood risks. Council requests that suitable flood modelling results be presented, which clearly identify the nature and extent of flooding within this area.

Also of concern is that the EIS proposes an underground storage in Dulwich Hill, which it is assumed is adjacent to School Parade. Council believes that it would be more beneficial to provide a new pipe from this location to the Cooks River which would provide more widespread benefits for the catchment. The pipe would be of a comparable cost, and avoid the complications of constructing an underground storage in an active rail corridor. Council has undertaken a drainage study of this catchment, which showed that a pipe option could significantly reduce flooding issues in the area. Council requests that the pipe option be seriously considered in place of the underground storage and that discussions be held with Council to explore this further.

Construction Impacts

The EIS identifies that during construction there may be the need for temporary changes to the stormwater drainage system that would be subject to further design and analysis. As the details of these changes are not provided in the EIS, Council requests that with regard to any temporary changes being considered, Council be informed during the early stages of the analysis so that Council can assess and provide comment before the proposed temporary changes are developed.

Specific comments

21.1.2 *Flooding – flood modelling included a 10% projected increase in rainfall intensity for climate change.* It is not clear if sea level rise was also considered and the 10% could be supplemented with other climate change scenarios of higher projected increases in rainfall intensity.

21.3.5 *The table identifies that the Marrickville Station precinct has a net reduction in impervious area post development.* This redevelopment represents an opportunity to improve environmental conditions – a rain garden is recommended in this area to meet the objectives of the *Marrickville Strategy for a Water Sensitive Community 2012-2021* and *Marrickville DCP 2011*, Chapter 2.17 WSUD. The *Western Channel Subcatchment Management Plan 2014* and associated Technical Report (large file, available on request) identify the potential for stormwater quality improvement works in the area including: a rain garden at Marrickville Station to treat flows from Schwebel Street, Leofrene Avenue and Illawarra Road; a rain garden off Arthur Street and channel naturalisation behind McNeilly Park; a rain garden or wetland between the ARTC line and Sydney Trains line and; channel naturalisation along the existing open channel. A technical report is available with details that should inform the project planning and design and be incorporated into the station and surrounds plan.

21.2.3 identifies relevant plans including the *Marrickville Valley Flood Study*; however, this and other relevant documents are not referred to in 21.3.2 (although it is noted that flood storage areas at McNeilly Park will be modified).

The project should refer to relevant local planning documents:

- Marrickville Strategy for a Water Sensitive Community 2012-2021
- Marrickville DCP 2011, Chapter 2.17 WSUD [*water-sensitive urban design*].
- Marrickville Draft Green Roofs and Walls DCP Chapter 2.19
- Opportunities for a Water Sensitive Greater Sydney - Greater Sydney Commission
- Western Channel Subcatchment Management Plan 2014

21.2.5 *Water quality objectives and criteria are based on the NSW Water Quality and River Flow Objectives and ANZECC 2000 guidelines.*

It must be noted that the Cooks River councils are working to make the Cooks River swimmable with the backing of the Commonwealth and State governments, with a swimming location at Kendrick Park identified by Marrickville Council in 2013. NSW Water Quality and River Flow Objectives and ANZECC 2000 guidelines are not sufficient for avoiding impacts on the Cooks River catchment. Council and the Cooks River Alliance councils currently apply the targets set by the Botany Bay Water Quality Improvement Program (BBWQIP) recommended by the NSW Government as they set the appropriate targets designed to improve water quality and reflect

pollutant loads associated with the land uses in the catchment area, including for phosphorous and nitrogen. All levels of government and catchment councils have invested significant resources and funding into improving the Cooks River, working to achieve the desire to “swim in the river.” The project must ensure consistency with this objective throughout construction and maintenance.

21.3 The EIS states “Cooks River is mapped as key fish habitat, and threatened fauna species listed under the Fisheries Management Act 1994 have been recorded or are predicted to occur in the study area. However, based on the poor quality of the river, previous records, and habitat requirements, these species are considered unlikely to occur. The other watercourses in the project area are considered unlikely to contain any significant sensitive environments.

Significant work is being done to restore estuarine, aquatic and riparian habitat, such as salt marsh. Contrary to the statement in the EIS, the fact that the river has been regarded as degraded emphasises the need to prevent poor water quality entering the river during construction and ongoing management of the project. Therefore, all water including runoff leaving the construction sites, rail corridor and associated infrastructure must be managed and treated to achieve the BBWQIP targets.

Summary

The EIS predominately talks about what the project proposes to do in order to address the flooding and drainage requirements. However, with regard to drainage and flooding it is necessary for Council to see the details at the concept design stage so that the proposals can be assessed in order to provide further comment to ensure flooding impacts and hazard risks are addressed and not increased.

The project should be aiming to reduce flooding impacts and hazard risks so as to benefit the community (rather than *not worsen*).

During the design stages of this project, opportunities to improve flooding issues along the rail corridor should be prioritised and implemented to reduce flooding impacts and the risks that come with flooding.

Air Quality

The Air Quality chapter provides a comprehensive assessment of air quality impacts during construction and operations. Dust is a major concern and the management activities proposed provide appropriate mitigation measures. Continued monitoring of localised air pollution is important to enable response to any issues and continued minimisation of impacts on the surrounding residential area. The Construction Environmental Management Framework outlines a detailed and satisfactory pathway for community liaison through both the Community Communication Strategy and Complaints Handling process.

Sustainability and Climate Change

The development of sustainability objectives, targets and initiatives is supported, including:

- Target "excellent" using the ISCA infrastructure sustainability rating tool
- Offset 25% of construction electricity and 100% operational electricity
- Onsite renewable energy (Solar PV)
- 5-star Greenstar rated over platform development
- Sustainable procurement policies
- Stations and stabling buildings to achieve at least a 15 per cent improvement over performance requirements set out in Section J of the National Construction Code.

Project Sustainability Benefits

Appendix F Sustainability Strategy states that the project is an enabler. By attracting more people to medium and higher density dwellings there would be household cost savings for the consumption of utilities (electricity, gas and water) and transport. The project also has the potential to result in a reduction in public health care costs as it will be enabling more customers to access public transport by walking and cycling.

The project as an enabler is recognised. However, concern is raised in relation to the achievement of such sustainability objectives via said medium and higher density dwellings. The inter-related Sydenham to Bankstown Urban Renewal Corridor Strategy lacks relevant background studies, objectives, targets and measures in relation to sustainable development and as such how the objectives in the Sustainability Strategy might be realised is unclear.

The Sydenham to Bankstown Urban Renewal Corridor Strategy for example is not consistent with the approach taken by Urban Growth for the Parramatta Road Urban Transformation Strategy (PRUTS). The PRUTS consists of a number of strategies, plans, and supporting technical documents, including a Sustainability Report describing the sustainability interventions to be applied to target World Class Urban Renewal.

Whilst Council considers its scope too narrow to bring about World Class Urban Renewal, the PRUTS does at least set a framework to measure sustainability performance against four key measures:

- Transport use (vehicle kilometres travelled per person per day)
- Water consumption (ML per person per year)
- Greenhouse gas emissions (tonnes per person per year)
- Household living affordability (\$ per household per year)

The PRUTS also put forward three key interventions for World Class Urban Renewal:

- High Performance Buildings
- Reduced and Decoupled Strategic Parking
- Urban Resilience and Infrastructure Delivery

In order to maximise sustainability benefits from the outcomes of the project, the project must ensure, as enabler, that the Sydenham to Bankstown Urban Renewal Corridor Strategy develops

an equally robust comprehensive sustainability framework with objectives, strategies and targets and measures that complement the sustainability objectives and targets of the project.

Infrastructure Sustainability Council of Australia Infrastructure Sustainability (IS) rating scheme

The IS framework applies a point score across 15 sustainability themes, including water and energy use, innovation, materials, management, climate change, heritage, stakeholders, and biodiversity. Application of the ISCA tool is commended. The project is targeting minimum rating - 65 "excellent"; Council seeks comment on how a higher ISCA rating of "leading" could be reached given that the project often describes itself as transformational.

Sustainability Initiatives and Targets

Table 24.2 – The project's sustainability targets could be strengthened through:

- Commitment to reducing the urban heat island effect through green infrastructure, including, Water Sensitive Urban Design (WSUD) and urban tree canopy.
- Prioritisation of existing trees and any other vegetation through retention

In addition, the following relevant local Council planning documents should be referred to with regard to climate change:

- *Climate Change Plan 2015-2025*, which identifies a broad target to reduce community greenhouse gas emissions (p3)
- *Marrickville DCP 2011* Chapter 2.16 Energy Efficiency
- *Urban Forest Strategy*
- *Urban Heat Mapping Data* - Landsat 5 TM derived land surface temperature (LST) and normalized difference vegetation index (NDVI) data for the Inner West Council LGA, captured on 17th January and 2nd February 2011, data sourced from Geoscience Australia and CSIRO.
 - o This development is in an area identified as warmer than surrounding areas in Council's urban heat maps. Urban heat mitigation is recommended through urban tree canopy and green infrastructure including water sensitive urban design. Refer also to the Marrickville DCP Chapter 2.17 WSUD, Strategy for a Water Sensitive Community and Urban Forest Strategy.

Hazards, risks and safety

The Hazards, risk and safety chapter identifies the legislation, process, procedures and management protocols that will be adhered to as part of the project. Ongoing implementation and compliance with the outlined processes will provide a safeguard against hazards to the surrounding residential areas. It is recommended that monitoring and reporting on this compliance be made public as is outlined in the Construction Environmental Management Framework.

Waste Management

- 26.1.1 - The WARR Act is 2001 (not 2007)
- Table 26.3 – spoil should be tested before being reused for ‘environmental work’ and ‘land restoration’ as a visual inspection cannot identify most contaminants
- Table 26.4 – re in-situ testing of potentially contaminated spoil, clarification is sought with regard to how these areas are identified
- 26.3.2 WM2 adoption of a recycling target of at least 90% in design and pre construction – clarification is sought on what this ‘recycling target’ includes and how “recycling” is defined, i.e. recycling/reusing/processing
- 26.3.4 – It is noted construction waste quantities would be confirmed during detailed design as would classifications and reuse/recycling/disposal locations. The project should provide a more detailed waste management plan at this time.
- There is no mention of tracking of waste that is being transported – further details on this are sought.
 - o Material within the categories advised by the NSW EPA must be tracked when transported within NSW or interstate:
 - o <http://www.epa.nsw.gov.au/owt/>
 - o <http://www.epa.nsw.gov.au/resources/owt/trackwaste07522.pdf>

Cumulative Impacts

The EIS examines twelve key projects which, when combined with the project, may result in cumulative impacts. These projects range from the Sydenham to Bankstown Urban Renewal Corridor Strategy to location specific developments including the upgrading of Marrickville Metro shopping centre. In analysing these projects the EIS considers that the Sydney Metro (Chatswood to Sydenham) project is the only one that may combine with the project itself to result in a cumulative impact.

In reaching this conclusion the EIS states that the Sydenham to Bankstown Urban Renewal Corridor Strategy is insufficiently advanced to warrant assessment.

The project was chosen from a range of options because it supports growth along the corridor – thus there is an intrinsic need to acknowledge that whilst they (the project and the Sydenham to Bankstown Urban Renewal Corridor Strategy) are different projects, they are completely intertwined and as such a detailed assessment of cumulative impacts that they may collectively bring about must be undertaken

The key detrimental cumulative impacts of the various projects in the vicinity of the project will be associated with construction activity.

Council considers that the magnitude and duration of construction activity associated with the Sydenham to Bankstown Urban Renewal Corridor Strategy will be sufficiently significant to warrant inclusion in the cumulative impacts assessment. Additional pressure from new residential development along the corridor will be placed on the existing railway line, exactly whilst it experiences prolonged periods of reduced capacity between 2019-2014. This clear cumulative impact has not been addressed in the EIS and must be undertaken.

In addition, the EIS even excludes the impact of current development taking place under the *Marrickville LEP 2011*, which must be taken into consideration with regard to the cumulative impact of construction along the corridor.

In this respect, while many current planning proposals are excluded from the EIS assessment of cumulative impacts, the purpose of such an assessment is to recognise that each incremental deterioration of conditions, whilst potentially small when assessed singularly, will have a significant impact when added to other activities.

Council also requests that, should approval be awarded, DPE place an embargo on planning upzonings in the Sydenham to Bankstown Urban Renewal Corridor until after the completion of the project. Failing this, a detailed assessment of the cumulative impacts of construction as a result of the Sydenham to Bankstown Urban Renewal Corridor *and* that for the project be undertaken and exhibited prior to any approval is awarded, given that this assessment is absent from the EIS.

The following are some examples of highly likely impacts as a result of cumulative activities in the vicinity of the project:

- Increasing disruption to surface road activities as nearby construction activities result in upstream delays on the road network resulting in a diversion of traffic to streets lower in the road hierarchy

- Disrupted surface road conditions (referred to above) will also have the likelihood of diverting pedestrians and cyclists to alternative routes, with the potential to create new conflict points. Concern is expressed that this situation is likely to be exacerbated by a lack of coordination between various development sites
- Specific limitations such as access across the heavy rail line being limited and that increased congestion on any one of these would divert additional traffic to the others
- Noise and dust associated with the construction of numerous uncoordinated projects has the potential to result in overlapping areas of influence and a lack of respite for local residents and businesses. Dust emissions and increased construction traffic have the potential to significantly reduce air quality, especially if weather conditions are dry
- An increase in impervious areas and loss of vegetation across the area
- A multitude of construction routes and conflict points are likely to develop independently from one another, resulting in a complex, unmanageable construction environment
- In addition to the impacts of anticipated projects it is highly likely that numerous utility works (both maintenance and upgrades) will be required during the project's construction period. Experience with the WestConnex Project has illustrated the high level of on-going disruption related to such works and their contribution to the lack of respite for local residents and businesses
- Acquisition of business properties during construction of the project is likely to result in a need for alternative employment locations, yet an overlap with the fallout from the Sydenham to Bankstown Urban Renewal Corridor Strategy has potential to limit the number of available premises (particularly industrial sites). This would then necessitate acquired businesses to relocate to other areas with the potential that they would not return to the corridor
- Similarly, the recent growth in music/entertainment venues around Sydenham and Marrickville Stations, and the unique social environment now developing, could be endangered by forced relocations, acquisitions and unattractive environments that could occur during the construction phase. This may result in such venues relocating to other areas and being reluctant to move back to Sydenham/Marrickville several years later.

Overall it is considered that the EIS is deficient in providing a realistic interpretation of the likely future cumulative conditions during the complete construction period for the project, particularly noting the absence of consideration of the impacts likely as a result of the Sydenham to Bankstown Urban Renewal Corridor Strategy. It is essential that a mechanism be developed to coordinate the construction activities of these projects with each other, with nearby development and with utility works. Such a mechanism should include:

- On-going monitoring of conditions and the ability to rapidly respond to issues as they arise
- Involvement of Council, residents and businesses
- Authority over developers, contractors, development agencies and utility agencies
- Transparency to all stakeholders
- An assessment of background environmental factors that contribute to cumulative impacts.

Technical Papers

Technical Paper 8

5.3 Surface Water Quality outcomes

There is reference to soils and sediment loads being the most likely source of contamination during construction phase, with the potential for large quantities of sediments to be directed into the stormwater network, beyond the capacity of what GPTs and WUSD devices could effectively manage.

It is recommended that the project maintain or improve water quality treatment in the construction area and the immediate vicinity. The project must work with Sydney Water and Councils to plan for best practice outcomes.

5.3.2 Potential for spills/leaks and 5.3.3 Demolition and construction works

“Release of potentially harmful chemicals and substances into Cooks River and Botany Bay may occur accidentally during construction due to spills from refuelling, malfunction and maintenance, concreting, poor storage and handling of substances, and disturbing contaminated land.”

All persons involved in the construction of the project must be inducted to understand and apply the objectives and actions in the soil and water management plan (7.1.3) including emergency response procedures and authorities.

5.4.3 Cumulative impacts – WestConnex

“WestConnex will primarily drain to Wolli Creek and Cooks River downstream of the project. The construction impacts of the Sydney to Bankstown project and WestConnex are expected to be relatively localised with WestConnex having a low probability to interact and impact on the water quality and flooding aspects of the Sydney to Bankstown project during construction.”

The estuary has complex interactions resulting from tidal ebbs and flows, and currents causing channelisation that redirects sediment and associated contaminants. Mixing of contaminants would be likely in these conditions and add to contamination present in the sediment from years of accumulation. This contamination would add to the bioaccumulation in local birds and other fauna, as well as vegetation.

Technical Paper 9

Table 3-1 Vegetation in Study Area, and Table 4-1 Proposed removal of vegetation within the project area

The project identifies 0.4 hectares of Degraded Turpentine – Grey Ironbark open forest on shale. This is not listed as an EEC because it does not contain characteristic canopy species listed in the Scientific Committee determination (NSWSC 2011a). The project proposes to remove this vegetation.

In an urban area which has already lost almost all of the original pre European vegetation, the site surrounding Dulwich Hill Station is locally very significant. Given its very local significance in addition to Council listing the site as a natural heritage area (Marrickville LEP), Council requests that the project recognises this very local significance as a seed orchard [with an important genetic legacy for locally significant plant species within this part of the corridor including: *Kunzea ambigua*, *Cymbopogon refractus*, *Themeda triandra*, *Aristida vagans*, *Aristida warburgii*, *Dichelachne crinata*, *Callistemon pinifolius*, *Rhytodisperma tenuior*, *Gleichenia dicarpia*, *Lobelia elata*, *Histiopteris incisia*, *Adiantum oethiopicum*] for ongoing local biodiversity projects and as habitat and connection for locally significant and declining small bird species [including: Red browed finch (*Neochmia temporalis*), Superb fairy wren (*Malurus cyaneus*), Silvereye (*Zosterops lateralis*) all recorded in this location].

Further, the native vegetation surrounding Dulwich Hill Station must be protected and retained through the project design process and sensitively and appropriately maintained. Council will continue to collect seed to propagate plants for ongoing local biodiversity projects.

3.7.1 Threatened ecological communities

The Turpentine – Grey Ironbark open forest on shale in the study area does not comprise an occurrence of the related community ‘Turpentine-Ironbark Forest of the Sydney Basin Bioregion’ which is listed as a CEEC under the EBPC Act.

As outlined above, this site and surrounds have an important local significance and so the vegetation must be retained and protected through the project design process, sensitively and appropriately maintained and that Council continue to be able to collect seed to propagate plants for ongoing local biodiversity projects.

3.7.3 Threatened fauna species and populations – Microbat species

Study did not record microbats during the fauna surveys and suggests limited habitat for these species and none are likely to rely on the habitats present for their foraging requirements.

This is not consistent with Council sightings and known roosting sites of at least one threatened species of microbat - Eastern Bentwing bat (*Miniopterus schreibersii oceanensis*). Council has recorded this species regularly on cooler month surveys since 2012 along the nearby Cooks River corridor (Marrickville Golf Course) and there is a winter roost site at Cadigal Reserve, Ashfield to the north of the study site. It is very likely that these bats are also utilising the corridor vegetation and habitat areas in the study area as well.

4.1.1 Summary of direct impacts – Removal of habitat resources

The assessment lists the loss of habitat fauna as being restricted to a very small area. It also claims that the vegetation to be cleared provides limited habitat resources for native fauna species.

Council disagrees with this assessment of habitat resources in the study area. Native vegetation in the local area is already very limited. Council recognises the importance of sensitively managing dense weedy vegetation given its significance as habitat in the absence of native vegetation for locally declining fauna (e.g. threatened Long-nosed Bandicoot population, small birds and terrestrial reptiles) and therefore the loss of habitat resources from the proposed clearing would be locally significant.

In addition to this, the assessment indicates the possible removal of two hollow bearing trees which would be a major loss given that hollow bearing trees in urban areas are so rare. Given their habitat significance within the urban environment the hollow bearing trees must be retained through the project design process. If this is not possible the project must offset this loss through a habitat box program and/or relocating the hollow trees to a local donor site in consultation with relevant Councils involved in the project.

4.3 Cumulative Impacts

The assessment states that the losses in biodiversity from this project and other road projects and developments are likely to be restricted, and would result in further loss of habitat from an already modified environment with only limited biodiversity values.

Council disagrees with these comments and considers the cumulative impacts of these projects and developments on biodiversity as significant. There is already very limited habitat available for local native fauna species and the ongoing clearing of remaining vegetation as a result of each new project or development, whether native or otherwise, is a threat to the viability of fauna and flora species and communities. All Councils are working collaboratively to protect and enhance local biodiversity; the project must also respect and work with this aim through retaining as much weedy and native vegetation as possible to continue to provide important habitat and connectivity for local native fauna through the project design process.

All damage and removal of vegetation and native habitat should be replaced on-site or at a minimum offset locally with funding and resources provided to Councils and others charged with responsibility to do this and manage the sites ongoing.

Table 4-2 Key threatening processes

The table lists the Key Threatening Processes under the TSC Act and EPBC Act. While 'Clearing Vegetation' is considered a key threatening process under these Acts, the assessment does not identify this as being of significance for the study area or to affect the viability of the remnant vegetation.

Please see comments above including comments for 4.3

5.5.1 Impacts on biodiversity that require further consideration – Long-nosed Bandicoot

The assessment lists the loss of habitat fauna as being restricted to a very small area. It also claims that the vegetation to be cleared provides limited habitat resources for native fauna species.

Council does not agree with this assessment of habitat resources in the study area. Native vegetation and available dense weedy habitat in the local area is already very limited. The loss of habitat resources from the proposed clearing would be locally significant. In addition to this, the assessment indicates the possible removal of two hollow bearing trees which would be a major loss given that hollow bearing trees in urban areas are so rare. Given their habitat significance within the urban environment the hollow bearing trees must be retained through the project design process. If this is not possible the project must offset this loss through a habitat box program and/or relocating the hollow trees to a local donor site in consultation with relevant Councils involved in the project.

Appendix A – Desktop Assessment of Threatened Biota

This table lists the species recorded or predicted to occur within 10km radius of the study area and includes the likelihood of the occurrence according to the EIS assessors.

Council also has recent records for the following species:

- **Powerful Owl** – This species has been sighted at Dulwich Hill and Wolli Creek
- **Long-nosed Bandicoot** – a confirmed dead Bandicoot was recorded in Dulwich Hill 2014 (also mentioned in the report)
- **Eastern Bentwing Bat** – Council has recorded this species each year on cooler month surveys since 2012 along the nearby Cooks River corridor (Marrickville Golf Course) and there is a winter roost site at Cadigal Reserve, Ashfield to the north of the study site.