

Submission for Sydenham to Bankstown Metro Preferred Project 2018

Thank you for the opportunity to provide feedback on the preferred project.

I support investment in new public transport to areas currently without however I wish to oppose the conversion of the Sydenham to Bankstown T3 heavy-rail line to the Sydney Metro.

There have been positive changes in The Preferred Project. These include retention of heritage buildings and platforms, retention of station entrances, reduced visual impacts, no acquisition of private property, reduced closures of the line and less disruption, reduction in loss of trees from 893 to 503, less track work through retaining tracks and overhead wiring, fewer changes to bridges & slightly improved traffic impacts. These changes were all needed, however they do not go far enough.

My opposition is based on concerns regarding information, which is to be found in the Preferred Project Sydney Metro City & Southwest

As a long term resident of Marrickville and a regular public transport rail customer I believe that Sydney needs a good integrated, public transport system, however the Preferred Metro Project as presented still does not provide the best value for taxpayers' money, nor is it an improvement to an already well functioning rail service, considering the disruption over 5+years and forfeits the opportunity to expand the public transport system to suburbs without a rail link.

Project Cost

- Estimated cost of \$11.5b to 12.5b(Chatswood to Bankstown) \$8.3b Sydney Metro Northwest remains the same despite reduction of works to be done. Final cost to be confirmed once all major contracts confirmed.
- Considering cost blowouts on other contracted projects such as West Connex & Light rail, concern that this cost may be considerably increased.
- A great deal of public money is involved, however lack of transparency regarding the metro undermines democratic decision making, accountability & community trust.
- Surely this money would be better spent on Public transport where there is a greater need, but currently not available such as a rail link to Badgery's Creek
- A cost benefit analysis has not been provided nor a business case.
- The Preferred project is still a waste of money with no justification for expenditure and billions of taxpayers' money being spent on one train to replace another.
- The social & financial costs of the project are not balanced by the level of benefit from the project.
- Very disappointing that the carriages were not built in Australia considering that construction "savings" lost through expensive import duties adding to the cost of the project.

Estimated Timeframe

- The Light rail project in the city is currently a long way over schedule and is a much less complex project.

- Time estimation for Metro from end of 2018 -2024 Is hardly feasible considering the enormity of work to be done on 10 stations and the time it took to upgrade Sydenham & Marrickville stations.
- Work to include: platform levelling, 5 upgrades with lifts and new stairs, internal re-purposing of station buildings, security screens on all platforms, track adjusting alignments, installing Metro rail systems, & upgrading overhead wires, 25 bridge upgrades, installing security measures including fences along the corridor for security and between the Freight line from Marrickville to Campsie, trackside intruder alarm system, noise barriers where required, modification of access gates, augmentation of existing power supply with new traction substation & new feeder cables, utility & rail system protection, improvements to pedestrian, cycle & kerbside facilities at nearly all stations& improved interchange at Dulwich Hill relocation.

Loss of Heritage

Although station buildings will be retained, surrounding the stations there are many more historic properties including period houses, which are not listed near the station precincts

Secondary Objective is “to serve & stimulate urban development” & in 2.7 “The project will play a role in supporting transit orientated urban development around stations”

The Metro is being used as a mechanism to force high density living onto low density heritage rich neighbourhoods. These plans for mass rezoning along the Sydenham/Bankstown line are strongly opposed by communities

- The Sydenham/Bankstown Urban renewal Strategy, linked to The Metro Project requires 6,000 new dwellings to be constructed within 800 metres on Marrickville Station.
- Thousands of historic, heritage/period houses (estimated 4,000) are targeted for demolition to be replaced by medium density/high rise developments that will destroy the character of Marrickville and other historic suburbs along the line..
- Without the Metro there would not be such a need for the above.
- The Transport Administration Amendment Bill (Sydney Metro) 2018 was recently passed to create The Sydney Metro Authority which will have greater land acquisition powers and will be ripe for control by a private corporation such as MTR Hong Kong with a business model based on transport value capture along transport routes.
- Residential Towers planned around other Metro stops at Crows Nest, Martin Place, Pitt St & Waterloo are not suitable for stations along the Metro South route.
- Sydney Airport has expressed concern regarding heights of buildings and cranes in future development of land around the stations in regard to air-space related issues in areas around Sydenham, Marrickville & Dulwich Hill.
- For Sydenham, Obstacle limitation surface (OLS) & procedures for air navigational services – aircraft operations (PANS-OPS) surfaces are approximately 30 metres above sea level (AHR) while at Marrickville & Dulwich Hill the OLS is at 51 metres AHD & PANS-OPS is approximately 126.4 and buildings constructed as part of the transit based urban re development of this area could but must not penetrate the PLS.
- Cranes can obtain temporary permission, however permanent intrusions of PANS-OPS are prohibited by Commonwealth law.

- Station precinct surrounding heritage demolitions should not be approved as it is not in the public interest to destroy the heritage, character and history of the suburbs along the corridor

Removal of Vegetation/Loss of Biodiversity

- The biodiversity assessment was undertaken on the assumption that all vegetation within the rail corridor would need to be removed, with the exception of areas of threatened species of Downey Wattle that are located in the rail corridor between Punchbowl & Bankstown.
- Potential 13.8 hectares of vegetation, including mature trees will be removed along the banks & rail lines to be replaced by security fence up to 2.4 m in height for the full length of the line.”
- The number of trees that need to be removed has been reduced from 893 to 503 trees (native & exotic), which will still create a great loss of canopy, biodiversity & impact on wildlife substantially.
- The area around Marrickville station is lacking in trees & any tree removals will have a significant impact on the existing sense of place.
- Existing valuable canopy trees should be retained because it takes decades to establish good tree cover.
- The final number of trees needing to be trimmed or removed is still to be confirmed during detailed design and final construction planning. Replacement trees need to be advanced specimens not tube stock.
- There are so few well established trees in this area the decision to remove so many trees should be reviewed as replacement trees take many years to be established

Sustainability & Climate Change

- Preferred Project states that majority of initiatives & targets are retained, however due to the revised scope around active transport & drainage design the following would only be considered where relevant & feasible: water sensitive urban design, inclusion of renewable energy sources & assessing & mitigating climate change.
- Surely all of the above factors should be mandatory for all aspects of the project.
- Climate variables identified in EIS included annual rainfall, extreme rainfall, extreme temperature, extreme wind, storms (cyclones, hail, dust and lightning) sea level rise and fire danger.
- All of the above variables have the potential to impact in the form of increase costs.
- Project needs to appropriately manage impacts of Climate Change & severe weather events on construction & project infrastructure functioning.
- SCC4 The need for climate change risk treatments would be assessed & incorporated into the detailed design, where required. N.B Flood modelling removed-surely climate change risks should have underpinned the project!
- SCC11 Climate Change risks states “Periodic reviews of climate change risks to be carried out to ensure ongoing resilience to the impacts of climate change.” Which indicates a “wait & see, reactionary model rather than a pro active risk assessment for the PP.

Hydrology & Flooding

- Preferred Project is retaining existing infrastructure where possible & minimising the extent of corridor works. It will not deliver new track drainage, modifications to

cross drainage & new retention basins which it claims will not result in worsening of existing flooding or flood hazard within the surrounding rail corridor.

- The loss of precious open space in Mc Neilly Park for a retention basin was of great concern to the community, however alternative storm water & flood mitigation must be addressed.
- FHW! All flooding strategies removed
- Sydney Water (7.2.2) advised that “The project should address in detail the existing flood risk & anticipated flood management system requirements to service future catchment conditions” and that “Flood management should not rely on existing informal storage.”
- The PP response is that the PP would be operated within the current hydrological environment & that further assessment works were no longer relevant & that no further modelling or assessment is proposed as part of detailed design Why?
- No flooding works are proposed for Marrickville Station
- 7.10.13 Marrickville Council concerned that information provided in EIS in relation to flooding is “scant & lacks specific detail as to the measures proposed to address flood mitigation in Inner West LGA.”
- Marrickville Valley Flood Study 2013 categorised Marrickville & Sydenham Railways stations as High Hazard areas in the 1% AEP event.
- Evidence of this was seen after heavy rain in April 2015 when the station was inundated by run off and flowed along the tracks at Marrickville Station.
- Study confirms that existing pit inlets do not provide sufficient capacity to convey storm flows into the main box culvert.
- EIS acknowledges high hazard area around Canterbury station but modelling of flooding was not undertaken.
- No Flood modelling outside the Marrickville Valley, which for a project this size is unacceptable.
- Predicted increase in rainfall intensity & extreme events affecting stations & surrounds requires that a flood management system is designed now so that residual flood risk to people & property is socially acceptable.
- Preferred Project must address current or potential impacts it may have on social & economic costs to the community as consequences of flooding along the line.

Greenhouse Gas Emissions

- The annual electricity consumption during operation is estimated to be 86,576 tonnes of CO2 equivalent.
- Operation & maintenance would result in increased emissions of greenhouse gas as a result of increased use. This is not how we should be planning for the future as all new projects should be designed to reduce Carbon emissions.
- The EIS states that the “Project has the potential to reduce greenhouse emissions by providing a comfortable & efficient alternative to private car travel” however this cannot be assumed as a definite outcome as other factors such as fare increases & discomfort of standing long distances in very close proximity to other commuters may encourage car use.
- 5.52 Alternative Energy provision at stations – The Preferred Project offers less opportunities for the inclusion of renewable energy sources, however the inclusion of solar photovoltaic would be incorporated in the detailed design of stations where feasible – why not make this mandatory?

- Recommendation that sustainable initiatives must be reviewed & updated & relevant initiatives implemented including the use of renewable energy to minimise greenhouse gas emissions.

Metro Impacts on Residents in Marrickville

Rail possession

Marrickville Residents will be severely inconvenienced due to rail line “possessions.”

Although there is a reduction of time over the Christmas holidays there will be 8 more weekend possessions and line closures will be significant – 53 weeks over 5 years.

- New category of Individual 2 month Station Closure has been added
- Hard to determine time - Estimate of 53 weeks is uncertain considering that EIS states that “the timescales of many of these (cumulative construction impacts) are unknown at this time” – this uncertainty does not change.
- Residents/commuters will suffer a great loss of amenity & quality of life with disruption to their lives over 5 + years Living with noise, dust & vibrations, sleep disturbance from night-time weekly work & loss of amenity far outweighs the net gains of the project.

Alternative transport arrangement & Temporary transport strategy outlines a number of components for alternative public transport arrangements by rail and bus during construction, station closures and possession periods.

- **These arrangements will severely inconvenience Marrickville residents & additional detail is required**
- Regular commuters know that current weekend possessions require careful planning and additional time and it is tiring changing bus to train & vice versa, waiting for connections in all weather conditions and uncomfortable travelling on overcrowded old buses.
- Temporary Transport Strategy needs much more planning to minimize disruption for commuters.
- The TTS will have a significant impact on local roads & modeling needs to be done with regard to local streets.
- TTS will also have impacts on local businesses, cafes & music venues with increased traffic, less parking & closures of stations.
- **53+ weeks of these arrangements will impact heavily on commuters and their families.**

Noise & Vibration

Suburbs with the worst noise impacts will be, Dulwich Hill, Marrickville Campsie, Canterbury & Bankstown because of number of residential properties along the track. Approximately 7,000 residents along the corridor are at risk of sleep disturbance. Residents around Marrickville Station would still suffer from rock breaking, diamond saws, excavation of existing concrete, ballast tamping (even though reduced) & night works and would still suffer from impact of noise & vibration over long periods of time.

- Table 15.4 shows number of receivers predicted to be subjected to greater than 25dba above NML noise levels” & shows reduction from EIS it is however hard to determine how it was calculated that only 87 Marrickville people would now be impacted considering the large number of residents living so close to the station. There are e.g. 221 units in The Revolution apartments alone which run along the line.

- 24 hour works would still be required and disruptive
- 8 additional weekend closures will also mean 8 more noise disrupted weekends, when people are trying to relax
- Construction traffic noise levels would exceed the relevant criteria on some roads in Marrickville, with majority of exceedances occurring during the night, due to temporary bus services during possession periods
- Preferred Project still does not name locations for Noise Barriers needed

Road network performance in Marrickville

- Potential changes to the road network around the stations, including location of compounds and work sites & involve temporary road and lane closures will impact heavily on already congested roads in Marrickville as stated in the EIS.
- Congestion will be a major problem during construction and there will be significant travel impacts
- Construction haulage vehicles (light and heavy trucks), work vehicles, rail replacement bus services, additional bus services will increase traffic congestion throughout Marrickville, impacting on intersection performance, the existing bus services & increasing hazards for motorists, pedestrians and cyclists sharing the roads.
- Preferred Project claim that it would result in significant reduction in construction traffic impacts when compared to possessions for exhibited project not true.
- Minor improvements in EIS intersection operation are noted in Table 15.2, however it is important to remember that there will be long term deterioration.
- Weekend Possessions - 28 replacement buses per hour will be required when the line is shut down for construction adding to congestion
- Buses going to and from Sydenham Station 15 to 55 bus trips per hour will need to pass through Marrickville & Marrickville Rd between Illawarra Rd & Silver St Marrickville will be the worst affected,
- Commuter buses together with construction vehicles will cause traffic gridlock.
- For construction haulage, the volume of materials that would need to be moved although reduced will still have major impact on road network.
- Additional Parking 5.6.1 No additional commuter parking along the line, only the idea that demand will be monitored
- Loss of Parking and worker parking needs a definite plan. Tradies do not catch trains nor will they catch buses when the lines are closed. They drive big trucks which take a lot of street space where parking demands already exceeds supply.
- Traffic modeling does not identify existing "rat runs" such as Calvert St , O'Hara St & Byrnes St in Marrickville which are used as alternatives to illawarra Rd and will be heavily impacted.
- Cumulative impacts of increased development, population & vehicle numbers and impact of West Connex on Sydenham & Marrickville do not appear to have been considered.

Bridge works

Fortunately bridge works along the line have been scaled back and the illawarra Rd bridge will not need to be rebuilt

It is important to note that all of the bridges along the line are currently very well used & highly congested in AM & PM peaks and any closure/partial closure will still have a major impact on traffic in the surrounding areas.

- The Illawarra Rd. Bridge has an Average Daily Traffic (ADT) of 11,900 & will have additional Heavy Vehicles & rail replacement buses during construction.
- This will lead to deterioration of traffic performance on surrounding road network
- 7 major Marrickville intersections all predicted to experience deterioration of the level of service as a result of partial closures.

Cumulative Impacts

Claim that Cumulative impacts would likely result in reduced cumulative impacts due to reduced intensity & extent of construction works compared to exhibited project is simplistic.

- This major project over 11 suburbs, spanning 5+ years will experience major cumulative impacts which will have a major impact on tens of thousands of people who live along the rail line.
- Cumulative Impacts are grossly understated considering the vast number of current developments and those planned for the future.
- Preferred Project is deficient in providing a realistic interpretation of cumulative impact of project in the absence of consideration of the Sydenham/Bankstown Urban Renewal strategy
- The impact of the Sydenham/Bankstown Urban Renewal Strategy is not considered as part of the Cumulative Impact Assessment due to the “draft nature of the plan” and the fact that the “construction timeframe is unknown”
- This is a most unacceptable omission considering that the expectation is that 35,400 new homes will be built along the line, 6,000 of them within 800 metres of Marrickville Station.
- The cumulative impacts of increase in population density, vehicle use, increase in traffic congestion, noise, public transport demands, loss of heritage, loss of amenity and social impacts will have major impact on current population & service provision and needs to be factored into Preferred Project.
- Cumulative impact of project & development on biodiversity will be significant. With loss of trees for other infrastructure projects such as light rail, west connex and general residential development, any loss of vegetation should be minimized. There is already very limited habitat available for local native fauna species and the ongoing clearing of remaining vegetation is a great threat to viability to fauna & flora species and communities.

Commuter/Residents' concerns

- Claim that Metro is needed in order to upgrade stations with lifts and create better access, however upgrades have been undergone in a timely fashion along all other train lines without the expense or disruption of The Metro.
- Design of Metro described as having a mix of seating and standing, however the majority of the passengers will be standing with a reduced capacity from 896 to 378
- Claim that Project is customer focussed is not accepted considering complete disregard for aging population, extended families travelling with young children and customer comfort with passengers forced to stand over long distances.
- Claim that trip will be more comfortable, however not if you are elderly, short statured, tired, pregnant, not physically able to hold on whilst standing, travelling with young children or unwell and have to stand all the way from any station to the city or to Chatswood or on the journey home you will not consider your trip as comfortable. Manners/courtesy regarding Priority seating have been long forgotten.

- Capacity levels quoted would be extremely uncomfortable, based on “crush capacity in Tokyo with pushers to get people onto trains. The actual capacity does not take into account back packs, baby back packs, luggage, people on mobiles, bikes & prams.
- Claim that Metro will provide better access to Education facilities is not correct as there is no stop at Redfern for Sydney University. Students and staff will have to back track after interchanging. Younger students travelling to school will be faced with interchanges rather than direct route.
- Claim that Metro will create a more modern service could be easily fixed with removal of battered old dirty rolling stock & replacement with more modern comfortable Waratah trains and improved signalling system (as has been mooted for two other lines)
- Commuters have expressed concern that there will be no driver or conductor on Metro. and fear for commuter safety on long underground stretches. The fact that commuters can see through the length of the carriage does not allay security fears. There is supposed to be CCTV however it is implied that commuters will be responsible for “active surveillance”
- Security issues are still of concern to commuters regarding long distances underground and include “What happens if someone lights a fire while underground? What happens if the computer control system is hacked and customers are underground & locked inside? What happens when power black outs occur? How would wheelchair customers be removed from a Metro without the guidance of on-board staff? What will happen in the event of racial abuse, fighting breaking out, aggressive behaviour from drug affected customers (which I have personally witnessed) or terrorist threats/acts without trained on board staff?
- Monitoring of Metro at Talerwang Rd is not of great comfort to this 35 year T3 line user
- Docklands light Rail in London is driverless but all trains have a conductor on board.
- Customer assistants are promised at every station and moving through the network during day and night” however with constant cuts to the rail network workforce, what guarantee can be given that this will be the case long term?
- On Metro trains there are only 2 multipurpose areas for prams, luggage and bicycles, whilst on current trains there are 2 per carriage and they are very congested on weekends when extended families travel to the city.
- Commuters are concerned that the initial use of 6 carriage trains will create overcrowding and that overcrowding will continue to be a problem as population densities increase along the line. With 2026 passenger demand forecast of daily customer movement of 23,800 for Bankstown, 13,800 for Punchbowl, 11,400 for Wiley Park, 14,800 for Lakemba, 13,00 for Belmore, 13,800 for Campsie, 14,200 for Canterbury how much space will there be left for the 14,200 for Canterbury, 9,400 for Hurlstone Park, 13,800 at Dulwich Hill, 13,800 for Marrickville and unknown number at Sydenham and Waterloo?
- Travel time reductions are not believable considering that commuters west of Bankstown, may have several train changes, and any commuter going to Circular Quay (a popular work, family, ferry, Cruise line and Opera House stop) may have difficulty walking 800 metres. Passengers from Marrickville to Central would save up to 4 minutes, however if they needed to change trains for a city circle train their 4 minutes would be quickly lost.
- On page 74 commuters west of Bankstown are effectively being told to go backwards to Cabramatta & interchange for trains to the city. Their travel times will definitely not be improved.
- Terminating a train at Bankstown will involve a major operational change.

- For 6 of the 9 trains west of Bankstown travel times will increase for trips to city with interchanges for Bankstown Metro, possibly Sydenham or Central for city access.
- 9 Stations west of Bankstown will lose all direct city trains & 19,000 commuters will face interchanges. This number will increase dramatically as population densities increase in the south western suburbs.
- Alternative transport arrangements during possession periods will have a major impact on commuters and their families. These include loss of kiss & ride, potential loss of dedicated & informal commuter parking areas, road closures and road network changes, leaving earlier, getting home later, with longer journeys needing to be planned for and family routines changed over a long periods of time adding to the stresses of daily life.
- 10.4.3 EIS Changes to parking states that "there are 1,200 unrestricted on street parking spaces within 400 metres of Marrickville station with 81% utilisation and that there would be capacity to absorb temporary loss of space during construction. (Local residents would doubt these statistics), This statement does not however consider all the other construction work that will be happening at the same time within the 400m mark and remains a problem for the preferred Project
- Alternate transport arrangements will have the potential to result in noise & air quality impacts and for an increase in public safety risks due to the increase in vehicles on the road network.
- Options for alternative Metro Routes have not been sufficiently analysed or considered.
- The Metro will most probably be developed by a Hong Kong developer and there are fears that the line will be privatised and expensive as the private T2 airport line is. Opal card and state set fares will be available at the start but for how long?

Chapter 11 P.16 EIS Road Network Claim that the "enhanced customer service provided by the Metro, including travel time savings is expected to result in growth in the use of rail services. This increased growth would potentially result in a reduction in the dependence on motor vehicles as the primary travel mode in the study area." This assumes that everyone will be travelling in a North /South direction, an assumption that cannot be made. If trains are overcrowded or residents work east or west of the line and suburbs have to be crossed then car usage will probably continue to be high and the statement that " introduction of the Metro would benefit local communities by providing a viable alternative to the car with benefits for the local road network." may not be realised.

Poor Consultation

- Community information sessions, such as those in Town Halls, community festivals & The Royal Easter Show are not consultation.
- These sessions provide glossy marketing rather than substance and are inadequate.
- Visitors to these sessions are presented with pre-defined options, everything decided, top down decisions and there is no genuine sharing of ideas.
- Visitors who do question aspects of the Project are usually lectured on what is "right" about the project. – This is not consultation.
- Community Sessions have been poorly attended due to limited timeframe, previous experience at such sessions and the knowledge that you will not be listened to nor your concerns taken seriously.

- Measuring success by numbers of encounters & the lack of engagement with communities along the line gives communities little hope for meaningful consultation in the future.
- To present a 1,000 page document to be read, considered, researched well in order to make a well informed submission requires much more time than has been granted.
- The process to develop a submission is almost as demanding as a university assignment which makes it difficult for full time employed, time poor people, those who speak other languages or who have limited English literacy skills.

Conclusion & Recommendations

- Construction of the Sydenham to Bankstown conversion to a Metro service will be costly and the money would be better spent developing a line where there is no public transport.
- The preferred Project should not be approved because it lacks bipartisan political and community support and is the product of a process that has lacked transparency, democratic decision making and good governance.
- A Metro to Badgery's Creek new Airport would be a better investment of public and private funds.
- Station upgrades to improve accessibility can be made without the expense of the Metro.
- Should the Metro be approved an embargo should be placed on planning "upzonings" and medium/high rise development until after the completion of the Metro Line and other infrastructure needed for increased population densities is in place.
- Recommendation that sustainable initiatives must be reviewed & updated & relevant initiatives implemented including the use of renewable energy to minimise greenhouse gas emissions.
- A full heritage analysis of the corridor should be conducted for the Preferred Project.
- Any residents affected by vibration, noise, light and dust during the construction period be appropriately compensated and facilities made available to ensure they can maintain healthy lives.
- Residents should be notified as to where noise barriers will be needed.
- Dilapidation reports should be done for all properties that will possibly be affected by construction works.
- Need to clarify how many hectares of vegetation will need to be removed and minimise the number of trees to be removed.
- The franchising to a private operator is not supported. This has not worked in Melbourne or Newcastle and should not be implemented here.
- The Hong Kong model of value capture development, utilized by MTR Corporation is totally inappropriate for many of the heritage rich, and garden suburbs with unique character along the corridor.
- There needs to be much more consultation & cooperation with State planning, local councils & their communities at planning stages

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