



Hurlstone Park Association (HPA) Inc. 141095

Feedback to the

Sydenham to Bankstown Submissions and Preferred Infrastructure Report

July 2018

The Hurlstone Park Association is pleased to submit feedback about the preferred Sydenham-Bankstown Metro project.

Executive Summary

The HPA does not support the construction of a metro on the T3 line. The justifications for the metro outlined in both the EIS and the Preferred Infrastructure Report (PIR) are contentious. The bottle neck justification was not in the original plan for the metro and may be addressed by other improvements which have been canvassed by transport experts. The decision to build a metro is patently not in the public interest, nor will it improve transport for passengers along the T3 line. The decision to build a metro was patently made to promote property development along the rail corridor as a primary consideration. The HPA is pleased that the PIR has addressed some of our concerns expressed in our submission to the EIS, including heritage preservation of station buildings and congestion caused by construction. However the HPA is not convinced by either the EIS or the PIR that the benefits to the public of constructing a privately operated metro outweigh the burdens to the public.

About the Hurlstone Park Association

The Hurlstone Park Association (HPA) was formed in 2014 in response to growing community concerns about over-development impacting residential areas of our small suburb, and to encourage a sense of community and local engagement in our past, present and future neighbourhood. We represent a diverse and growing cross-section of our local community with a reach of in excess of 900 people through membership, email and social media. We regularly hold meetings, have community events, inform local residents about local issues related to planning and development and make representations, on behalf of the community, to council, the land and environment court, major projects and plans. Some of our committee members have

been selected as community representatives on liveability, heritage, and planning groups for the Bankstown Canterbury council.

Background - the local experience of the Metro project and Sydenham to Bankstown *Urban Renewal* plans

The Hurlstone Park community has shown significant interest at meetings and on our Face book site about heritage issues. The community has been vocal in its opposition to the draft Sydenham to Bankstown Urban Renewal Strategy, and the metro conversion of the rail line, especially with regards to the heritage destruction that will certainly follow land acquisitions and zoning changes. The large number of submissions raising concerns about the metro and urban renewal (more than 300 each time) reflects this small suburb's cohesiveness and successful engagement by the HPA with locals.

The community has been eagerly awaiting re-exhibition of heritage protections for the suburb, which has 60% heritage- style homes (Hurlstone Park Heritage Assessment Study Stage 1 report, for Canterbury-Bankstown Council, 2016).

The community was dismayed at the original plans for the *Urban Renewal* strategy. Not only had 25% of the suburb been allocated to Canterbury, for the benefit of developers, indiscriminate up-zoning of heritage-rich areas was recommended.

This occurred in the context of contentious development along congested Canterbury and New Canterbury Roads. Planning decisions by the previous Canterbury Council are currently the subject of an ICAC enquiry.

The village-like shopping strip and railway station group also have significant heritage appeal, valued by the community. In 2016 the local railway station building was recommended for state heritage listing, and the shopping strip as one of several Heritage Conservation Area.

The EIS for the Metro south-west project was yet another poorly-imagined and unwelcome document, designed, we submit, with the intent to destroy and devalue heritage railway items or at least with no thought to preserve and value heritage. Hurlstone Park would have lost most of its heritage structures, and its heritage listing. Pre-fabricated "pods" were to be installed and the front entrance would be reminiscent of some large take-away food chain which was inconsistent with the desired and future character of Hurlstone Park.

Hurlstone Park's protests were followed by a news story on Channel 7 suggesting we would lose our railway station if we did not accept high-rise (Rod Staples, and then Planning Minister Rob Stokes appeared on this story). (<https://au.news.yahoo.com/hurlstone-park-railway-station-to-close-after-120-years-of-service-32188216.html>)

While the HPA was pleased to meet with Metro representatives to discuss design issues around the station precinct, before exhibition of the EIS, this should not be seen as a privilege - in a democracy, communities expect to be consulted about plans

for their area, especially when destruction of heritage-listed items, and incongruous development, is threatened. It appears that plenty of “stakeholders” with dubious interests were afforded special insights and invitations by Metro representatives under the guise of lobbying. The community overall has been distrustful of, and dissatisfied with, the entire project.

The HPA is pleased that some of the major and justifiable concerns of communities have been acknowledged, especially:

- construction and congestion impacts
- railway heritage demolition and diminution
- vegetation impacts

There are still major issues that prevent community support for the Metro that have not been adequately addressed in the PIR. The following is a summary of our concerns about the response to the submissions and the preferred project:

1. We have some concerns about the analysis of the submissions.
2. The response about justifications for the project mostly repeats those of the exhibited project, along with a congestion argument. Although we welcome planned upgrades to signalling for other lines, as announced by the Premier in June 2018, the justifications for the conversion of our line remain unconvincing. We note the “unblocking a bottleneck” argument was not in preliminary planning documents for the metro and seems to have come in post ipso facto as a justification.
3. The response to concerns about options and alternatives again largely repeats those of the exhibited project.
4. The response about benefits of the project is to again largely repeat those of the exhibited project; again, benefits have been over-stated, and the preferred project as a whole still appears to have more negative than positive impacts.
5. The response to negative impacts has at least acknowledged multiple concerns about heritage, station design and construction impacts. There will still be significant impacts in these domains.
6. The response to concerns about the privatisation of the operation of the service is dismissive and has misjudged community sentiment.
7. The response to multiple concerns about residential and retail development around stations, and in suburbs along the corridor generally, is disingenuous, given one of the intents of the project is to trigger growth and development.
8. The response to multiple concerns about the nature and quality of community consultation missed the mark entirely. Couched in quantitative terms, the response essentially ignored the complaints.
9. Concerns about green space, vegetation. The loss of the previously planned active

green strip takes away one of the few benefits of the project.

1. Concerns about the analysis of the submissions.

- Only 17 of 549, or around 3%, of submitters supported the project, yet supportive comments were given prominence, at the beginning of each section in the response section. In several sections of the submissions report, the choice of words tended to suggest greater support than actually existed; for example, in regards the project need, (Part B, Submissions report p23) it is stated “A number of submissions expressed their support for the project, and/or Sydney Metro as a whole.” A more accurate statement would have been “There was hardly any support shown for the project.” At the beginning of many sections of the report, the authors list about as many positive statements as negative statements which seems to infer a good level of support, which is clearly false and misleading. They repeat this technique throughout the response to submissions (see also p30 - benefits of the project).
- It is really significant that the response was overwhelmingly negative; the two large c
- Councils (Inner West, and Canterbury Bankstown) expressed multiple concerns in their submissions, and the project lacks the support of both Councils.
- 324 individuals submitted a form letter (the HPA one) so the issues raised were lumped together. However, 15 of these individuals added extra comments, sentences or pages and so these should have been classified as UNIQUE submissions. Many of the pro-metro submissions were only a couple of sentences. This was a biased analysis in favour of the pro-metro submissions.
- The analysis is simplistic and quantitative - it makes no mention of the quality of submissions.
- It is fair to say that the quality of the submission in favour of the project was poor, with few exceptions. Most favourable submissions were a few sentences long, some simply repeating Metro promotional phrases. e.g. “*Remove the current congestion from the train network ; Allows for new modern transport which is efficient and safe; safely distributes the travelling population throughout the ‘city loop’ and minimise delays and heavy foot traffic in the current limited station stops*” (batch 1 submissions, p 3).
- It is also fair to say that the quality of submissions opposing the Metro was generally high. While a handful were from residents with concerns about their own properties, the vast majority were analytical and addressed the project’s limitations in general (non-locational) terms. Many were lengthy and detailed, covering a wide range of issues and reflecting a good understanding of the project and the project area. These were not NIMBY submissions and critique a project that has many flaws and many vested interests including property developers.

- The tone of submissions suggested a great lack of confidence and trust in the government and transport and planning agencies.

1. The response about justifications for the project.

- It is clear that the public has not been convinced of the need for the project. The response to multiple concerns about this was to mainly repeat the justifications of the exhibited project, with some extra information related to congestion.
- Although we welcome planned upgrades to signalling for other lines, as announced by the Premier in June 2018, the justifications for the conversion of our line remain unconvincing.
- According to the report:

“The need for Sydney Metro was established by Sydney’s Rail Future 2012a”(Part B, Submissions Report,p28) and

“While the project would result in benefits for wider Sydney, such as increasing rail capacity and access to a range of key destinations, there are also a number of benefits for local communities” (Part B, Submissions Report, p35).

In *Sydney’s Rail Future* (Transport for NSW, 2012) p.24, it is stated:

“In the Sydney context an independent metro system would deliver few benefits in terms of service enhancement, capacity improvements or better operating efficiency on the existing rail network. A dedicated metro-style system would not maximise the use of the existing rail assets. It would create a separate system that would divert funding away from service improvements on the existing rail network and only provide benefits to customers who use the new lines”.

- While it is understood that signalling upgrades are planned, the Metro has always been promoted to us on the basis that, in and of itself, by relieving the bottleneck, it would have benefits across the network. This major justification is contradicted by Sydney’s Rail Future (above) and also by past rail executives, quoted in the Sydney Morning Herald:

“The state government’s \$20 billion-plus metro train line under construction in Sydney “could have been built far cheaper with more sensible planning”, four of NSW’s top former rail executives have said in a highly critical assessment of the project. In an analysis released under freedom-of-information laws, the former rail heavyweights warn that the metro train plans will result in “degradation of the robustness and reliability” of Sydney’s existing heavy rail network, and “ultimately lead to the total network becoming gridlocked and unworkable”.

<https://www.smh.com.au/national/nsw/gridlocked-and-unworkable-dire-warning-for-sydneys-trains-from-former-top-execs-20171213-h03omz.html> Accessed 2/7/2018

- There remains considerable concern, therefore, that the government has not been transparent about the justifications for the project which appear primarily to be privatisation of its operation, and property development along the corridor.
- Economic justifications are hard to accept. There have been significant costing errors and budget blow-outs in many major state projects (Newcastle Light rail link; WestConnex, the City Light Rail, and the projected costs of 2 new Parramatta schools, as just a few examples). The lack of public disclosure of business cases involving billions of dollars of public money does not instil confidence, especially when criticised by the State Audit office (along with concerns about the excessive use of consultants). The Sydney Morning Herald quoted the State Auditor:

“when project governance is lacking, there is a major risk of incurring additional unbudgeted costs”

<https://www.smh.com.au/national/nsw/government-spending-on-consultants-blows-out-by-250m-auditor-20171222-h09bso.html>

Accessed 2/7/2018

- The HPA feels there is a great risk of over-spending on this project. There is insufficient detail in the PIR; this runs the risk of budgetary error. There are many details that have been deferred - further assessments, construction details, alternative transport arrangements, heritage reports and station precinct designs are to be decided on later. We also note the use of numerous private consultants for both the exhibited and preferred projects and are not supportive of this.

2. The response to concerns about options and alternatives

- The response to concerns largely repeats those of the exhibited project. The HPA maintains the position that there is a greater need for public transport in other areas, and the Metro should be re-directed to areas without a current rail line.
- The HPA does not believe a single-decker Metro, with far fewer seats, is suitable for a lengthy rail track of 66 km with relatively few stops. Alternatives must be addressed to improve the heavy rail network’s capacity (such as tunnelling options if the City Circle and Sydenham sites are problematic, and improvements in signalling and timetabling, now).
- We note from the report *“Transport for NSW is currently investigating the development of Sydney Metro West, an underground metro railway that would link the Parramatta and Sydney CBDs. Sydney Metro West would deliver increased capacity to Western Sydney to help relieve capacity issues on the T1 Western Line.”* (Part B Submissions report p45). Underground options for heavy rail should be considered.

3. The response to benefits of the project

- The PIR response, again, is to largely repeat benefits stated in the exhibited project; again, benefits have been over-stated, and the preferred project as a whole has more negative than positive impacts.

- The benefits to the communities affected are less clear than they are for developers, MTR Corporation Hong Kong and senior Metro/transport executives. It is arguable that the public interest was not the primary consideration in deciding to construct a metro on an existing train line but rather the interests of developers in opening up development opportunities along the rail corridor.
- More direct access will not occur, nor will “better access to education” - the popular stops of St Peters, Erskineville, Redfern (for the University of Sydney) and City Circle will be lost. Commuters west of Bankstown will be burdened with many facing longer commuting times and less direct connections (Part B, Submissions Report p74 and 108). This is not an acceptable outcome and is contrary to one of the major strategic contexts - the “30 minute city” of the Greater Sydney Commission.
- Opal ticketing is not a benefit - we already have it.
- The response to submissions fails to explain why a metro is needed for accessibility upgrades at stations (Part B, Submissions Report p29); many heavy rail stations have had such upgrades over time; there remains plenty of room for improvement for accessibility in the existing network, such as improved acoustics of announcements for the visually impaired. In addition, metro trains will have significantly reduced seating capacity, which is inappropriate for a 66km railway with an ageing population.
- The PIR response addresses specific benefits for Hurlstone Park (Part B, Submissions Report p 36). The preservation of our railway heritage is most welcome, although it is noted there will still be moderate effects due to changes in the fabric of the platform building. The pressure for high-rise development triggered by a metro would be unwelcome in this heritage-rich suburb. An increased number of services must be seen in the context of this government incrementally reducing the number of services to the suburb since 2013 and metro trains having significantly less seats. The claim of better connections to “key employment and service centres” is arguable, as current popular stops will be lost.

4. The response to negative impacts

- The response has at least acknowledged multiple concerns about heritage, station design and construction impacts. There will still be significant impacts in these areas.
- Overwhelmingly, the submissions were reflective of the negative effects of the project locally and across the network - over-development, privatisation of the service, loss of popular stops, impacts for residents beyond Bankstown, priority issues - lack of investment into new rail services, reduced seating capacity, etc.
- The decision to preserve, restore and re-use our significant rail heritage along the line is important. (Part B, Submissions Report pp 48-49). The exhibited project demonstrated a reckless approach to heritage, and the use of heritage architects for the preferred project, should it proceed, is appropriate.

- At Hurlstone Park Station, the HPA would like to see replication of the heritage handrail on the station steps.
- Hurlstone Park Station was recommended for state heritage listing in 2016. The community supports this and hopes that works for the metro would not impede such a listing. In the report's Non-Aboriginal Heritage Assessment, Appendix F, it is admitted that some "items or fabric (are) proposed for removal and the historic character of the line ... would be altered by the contemporary metro". (p93). This is of some concern and requires clarification.
- The commitment to take into account the proposed Heritage Conservation Areas is welcome.
- The decision to abandon the inappropriate design plans for station precincts is also welcome. It is disappointing that community input into station precinct and open space planning is given such a low priority, especially in the context of multiple submissions critical of the consultation process to date (Part B, Submissions Report p 51-53 and p 58-70). "Place-making" should begin with the people who live in and know in the places.
- The view from the proposed Floss Street Heritage Conservation Area should be considered in the in the development of the "integrated urban and place making outcome" for Hurlstone Park Station. We have concerns about the installation of throw screens on the heritage listed bridge at Hurlstone Park Station. The anti- throw screen on the bridge at Hurlstone Park could include elements of heritage construction and images, and retain the ability for pedestrians to view the heritage buildings on platforms 1 and 2.
- The Hurlstone Park Association would like to be included as one of the major stakeholders consulted in the development of the "integrated urban and place making outcome" for Hurlstone Park Station.
- Although construction impacts have been lessened, which is appropriate, the impacts will still be significant and temporary transport issues have not been detailed. The gas leak in the city on 7th July 2018 due to metro construction work is a concern; issues with cost blow-outs and legal proceedings for the light rail project do not instil public confidence in the construction process.
- The predicted excess operational noise criteria due to increase in train speeds are of significant concern. In Hurlstone Park, locals would welcome noise attenuation in the form of denser vegetation or other heritage sympathetic attenuation measures.
- The HPA believes that traffic congestion will be greater than suggested in the report. It appears that traffic trends were essentially measured outside of the project area and therefore do not accurately reflect likely impacts during construction (Appendix D, p6).
- There is considerable doubt that the proposed carriages will provide a comfortable experience for passengers. The preferred project does nothing to address the concerns regarding the significantly reduced percentage of capacity that will be

seated. This fails to account for the forecast changing demographic of the City of Sydney: Between 2018 and 2022, the age structure forecasts for the City of Sydney indicate a 17.1% increase in population under working age, a 11.5% increase in population of retirement age, and a 8.2% increase in population of working age. In the Inner West Council areas along the line, Dulwich Hill and Marrickville had 12.2% and 13% (respectively) composition of residents over 65 years. Hurlstone Park had 16.7% of residents over 65 years (2016 Census).

5. The response to concerns about privatisation

- Unfortunately the response to the many justifiable concerns about privatisation is dismissive and has misjudged community sentiment
- The franchising to a private operator is not supported. There is considerable community concerns about public-private partnerships and using contractors for public transport. There has been considerable public concern about poor outcomes in Newcastle since this occurred there. There is good evidence to suggest Melbourne's privatisation of rail services has had negative financial and service provision impacts. <https://www.themandarin.com.au/79973-franchising-privatising-public-transport-doesnt-live-hype/> accessed 4/7/18 (RIMIT academic review supports this view)
- In particular, the Hong-Kong model of development, utilised by MTR Corporation, is totally inappropriate for many of the heritage-rich and garden suburbs in this corridor. MTR Corporation has been already contracted to operate the Northwest Metro.

6. The response to multiple concerns about residential and retail development

- The HPA notes that multiple concerns about development are consistently dismissed: *“Transport for NSW is not proposing to deliver any residential developments, or over-station developments as part of this project. Any future development would be subject to a separate assessment and planning approval process”*.(Part B, Submissions report, p36)
- While denying development intent, the PIR makes several references throughout to the strategic context involving various planning bodies including the Greater Sydney Commissions (GSC). Value capture is also part of the vision of Sydney's Future Transport Strategy 2056 -priorities include integrating planning and transport, and a “commercial focus on asset management” and “shared use of transport assets”. In addition, the NSW Property Council and the Australian Turf Club were invited as Stakeholders.
- The exhibited project was to act as a “catalyst” for growth and was released to complement the hugely unpopular *Urban Renewal Strategy* for the corridor. Whether the metro, MTR or GSC forces the growth, the intent of the metro is to lead to development and communities are sure this will be mandated whether they like it or not. The HPA is also concerned about the formation of the Sydney Metro Authority and related land acquisition powers.

7. The response to concerns about community consultation

- The response to multiple complaints about the lack of meaningful consultation was couched in quantitative terms - listing the types of techniques used, and recording the number of “encounters”. This response essentially ignored the concerns in submission.
- As a simple example, the report notes that:

“A total of 316 people attended the eight information sessions” (Part B, Submissions Report p32). This is a rather meaningless record of attendance and does not reflect best practice in results recording which aims to both reflect the justification for a strategy and how the strategy links to the desired outcome.

Compare this with the HPA, representing the smallest suburb along the corridor - 324 submissions over two Saturday mornings (without a publicly- funded budget for glossy brochures and summaries) - this reveals much greater engagement.

- The response failed to address the lack of meaningful engagement with communities, and concerns about biased and misleading information provided.
- The continued use of glossy brochures, which have replaced transparency and meaning, reveals little hope for meaningful consultation in the future. The PIR Overview, for example, contains numerous examples of half-truths such as “seating”, “publicly owned”, Beyond Bankstown” on p 8, without any mention of reduced seating capacity, the privatisation of the operation and reduced direct connections and increased travel times for many commuters beyond Bankstown.

8. Concerns about green space, vegetation

- The HPA is disappointed that one of the few benefits flagged in the EIS of the exhibited project, a dedicated active transport corridor, has been abandoned.
- The HPA is very concerned about the loss of mature trees and tree canopy during construction, for example around Lakemba, Wiley Park and Punchbowl stations. There will be significant loss of vegetation from council-owned land along the corridor. (Appendix G 'landscape and visual' section). In this day and age of climate change with concomitant increasing temperatures, the destruction of mature trees is counter to risk management and mitigation of the effects of climate change.

In summary, the HPA is pleased that concerns about heritage and construction impacts, and about station designs, has been considered in the preferred project. Overall, there remain ongoing concerns with meaningful consultation. The HPA does not support the project.

We ask that this project is not approved as it lacks bipartisan and community support. Neither the IWC nor Bankstown Canterbury City Council support the metro in its current form.

The preferred project, to best benefit communities, and Sydney, should be:

- retaining the heavy rail, without a private operator**
- investing now in time-tables and signalling, and connections for commuters beyond Bankstown**
- upgrading all stations for accessibility, safety, landscaping and active transport connections**
- retaining and restoring railway heritage to enable railway-related use including rest-rooms and toilets**
- prioritising investment in new rail and rapid bus systems across Sydney instead of converting existing lines/ building more toll-ways**