



A submission in response to the

Sydenham to Bankstown Submissions and Preferred Infrastructure Report (Application No SSI 17_8256)

Prepared by EcoTransit Sydney
17 July 2018

Authorised by the Executive Committee of EcoTransit Sydney

The submission consists of 6 pages

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EcoTransit Sydney has **not** made a reportable political donation.

We have read the Department's Privacy Statement and agree to the Department using our submission in the ways it describes. We understand this includes full publication on the Department's website of my submission, any attachments, and any of the personal information in those documents, and possible supply to third parties such as state agencies, local government and the proponent.

John Bignucolo

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Secretary
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17 July 2018

To Whom it May Concern,

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

EcoTransit Sydney is opposed to the conversion of the Sydenham-Bankstown heavy rail line to metro.

The conversion of an established heavy rail line to a metro line is a misallocation¹ of scarce public monies. The conversion should be abandoned and the project's funding directed to:

- The construction of **new** heavy-rail lines in areas that are not presently serviced by the heavy-rail network.
- The amplification of the main heavy rail trunk lines that are presently operating well above their nominal capacity.
- The construction of **new** cross-network links and lines with the aim of adding capacity and reducing congestion on the existing Sydney Trains network.

We note that the preferred project, as described so far, has addressed some of the widespread concerns about congestion and construction impacts, the planned destruction of railway heritage items and removal of vegetation. Unfortunately the response to submissions, and preferred project, falls short of community expectations.

The main concerns regarding the metro, the report on submissions and the preferred project are:

1. The response to concerns about the justifications for the project (Part B, Submissions Report pp. 14-15) does nothing to convince the community of its need, especially in the context of poor transparency regarding business cases, and political agendas relating to privatisation and property development.. The justifications have been contradicted by independent rail experts and Sydney's Rail Future 2012 (*"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"*, p. 24, *Sydney's Rail Future 2012*). 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). Metro trains are designed for short distances with frequent stops; the capacity argument is based on most people standing.
2. The response has failed to acknowledge community concerns about the supposed benefits (Part B, Submissions Report pp. 30-35):
 - More direct access will not occur — the popular stops of St Peters, Erskineville, Redfern and City Circle will be lost. Commuters west of Bankstown will be worse off with many facing longer commuting times and less direct connections (Part B, Submissions Report p. 74 and 108). This is not an acceptable outcome and is contrary to one of the a major

¹ http://exigent.aptnsw.org.au/Fixing_the_trains_in_Sydney_1855_revisited_Sandy_Thomas_August_2013_portrait_format.pdf

strategic contexts — the “30 minute city” of the Greater Sydney Commission.

- Opal ticketing is not a benefit — it is something that has already been introduced.
- The response to submissions fails to explain why a metro is needed for accessibility upgrades at stations (Part B, Submissions Report p. 29); 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 response addresses specific benefits for Hurlstone Park (Part B, Submissions Report p. 36) The preservation of our railway heritage is welcome, but 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.

3. The response to concerns about development is dismissive (Part B, Submissions Report pp. 36-39). The link to development has been made repeatedly, with the exhibited project acting as a “catalyst” for growth; the strategic context of the metro and its relationship to *Future Transport 2056* (which supports the concept of property value-capture), the *Greater Sydney Commission* (seeking to integrate land use and transport planning), and the *Sydenham-Bankstown Urban Renewal Strategy* (widely condemned by communities for its indiscriminate up-zoning plans; the invitations to Stakeholders such as the Australian Turf Club and the NSW property Council and the awarding of metro operations in northern Sydney to MTR Honk Kong with its “rail plus property” Business model. The project will promote growth in a climate of lack of community trust in the planning process and poor quality development without benefits such as affordability, green space and amenity.

4. The response to some of the negative consequence of the metro has been welcome:

- 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 use of traditional hand rails for the stairs would be welcome. 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 andthe historic character of the line...would be altered by the contemporary metro”. (p. 93). This is of some concern and requires clarification.
- 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 pp. 51-53 and pp. 58-70). “Place-making” should begin with the people who live in and know in the places.

- The Hurlstone Park Association should be one of the stakeholders consulted in the development of the “integrated urban and place making outcome” for Hurlstone Park Station.

5. 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 instill public confidence. The predicted exceedences of operational noise criteria due to increase in train speeds are a significant concern. In Hurlstone Park, locals would welcome noise attenuation in the form of denser vegetation or other heritage sympathetic attenuation measures.

6. The franchising to a private operator is not supported. This has not been good for Melbourne or Newcastle, and we do not want it here. 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

7. The loss of the previously planned active green strip takes away one of the few benefits of the project.

8. The response to concerns about community consultation is inadequate and inappropriate. Justifying the many techniques used, and measuring success by the number of encounters, does not address the lack of engagement with, and failure to prioritise the input of, the communities along the line and beyond Bankstown, who are opposed to the project. In addition, the continued use of biased glossy brochures, which have replaced transparency and meaning, reveals little hope for meaningful consultation in the future.

9. We remain 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 summary, this project should not be approved because it lacks bipartisan and community support, and is the product of process that has totally lacked transparency, accountability, and good governance.

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 heavy rail and light rail systems across Sydney instead of converting existing rail lines to metro, or building more toll-ways

Yours Sincerely,
John Bignucolo

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