

**SUBMISSION TO THE SYDNEY METRO CITY AND SOUTHWEST T3 BANKSTOWN LINE- SYDENHAM
TO BANKSTOWN UPGRADE**

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The Director
Major Projects Assessment
Department of Planning and Environment
GPO Box 39
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Attention: Planner- Naomi Moss

Dear Director

Thank you for the opportunity to comment on the revised plans for the Sydney Metro City and Southwest Sydenham to Bankstown Upgrade Preferred Infrastructure Report. There are a number of considerations in relation to this proposal which are discussed as follows.

1) JUSTIFICATION FOR THE REMOVAL OF HEAVY RAIL LINE AND REPLACEMENT WITH METRO

The proposal to remove the existing heavy rail line and its replacement with a Metro line has significant impacts and implications for residents and community members, the natural and built environment and heritage of the 11 suburbs affected. These impacts are short and long term.

The proposal alters the type of train and its frequency, its capacity and seating, its safety, the train stations and access to the City to that currently experienced by the communities on the line. The estimated cost of replacing the existing heavy rail line and conversion to a Metro is over \$12 billion. In the short term, commuters will be forced to travel by bus as the rail line is converted. If additional high-density residential development is included in this process, the numbers of people to be moved by bus is significant and it is unclear how this can be successfully managed and how long this will take place. Existing businesses located along the line will be impacted and there is adequate evidence of significant financial impacts on businesses from the Randwick Light Rail and George Street Light Rail as examples of what can take place in major transport projects.

The Business Case has never been released in full, which reduces community confidence in this project. With the changes proposed in the new Report, it is not clear how this impacts the existing partially released (redacted) Business Case.

The Metro proposal is tied into potential up-zoning along the Corridor which will alter all existing suburbs, many of which have heritage significance and urban character which is valued by the

local communities. Many of the rail stations themselves have heritage significance, some of which are listed on the State Heritage Register.

There is a potential conflict between the construction of the Metro and the role of the Metro as private developer. Sydney Metro was privatised in May this year in the NSW Parliament via the *Transport Administration Amendment Bill (SYDNEY METRO) BILL 2018* giving it unprecedented development powers in relation to acquisition of and development of residential, shopping centres within the Metro Corridor. Sydney Metro may potentially be sold to a company such as MTR Corporation which is 79% owned by the Hong Kong Government who in turn will develop within the Corridor and not be subject to public or parliamentary scrutiny.

In addition to these issues, the impact of the Metro on the proper functioning of Sydneys existing heavy rail network has been raised. Former rail executives Messers Brew, Christie, O'Loughlin, and Day in an assessment of the Metro Project (dated 3 July 2015 and 3 months prior to the announcement to convert the Sydenham to Bankstown line from heavy rail to Metro) have stated that the Sydney Metro Plan (including the removal of the Bankstown T3 line) 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"*.

The submission also makes the following comments:

Metro trains are best suited to highly populated, densely trafficked commuter areas over short journey times and NOT long, park and ride journeys.
Removal of the heavy rail on the Bankstown line will cause major disruption to the efficient operation of the network resulting in Reduction in network flexibility and reliability;
19,000 commuters will have to change trains for the first time since the network was built, Resulting in longer journey times for commuters from the Southern stations between Liverpool/Lidcombe turn back and in between stations from Carramar, Villawood, Leightonfield, Chesterhill, Sefton(11,000) and Berala, Birrong, Yagoona(8000) to Bankstown;
Following the takeover of the Bankstown line by the Metro train the relief valve for the network is gone and will result in the network having no escape route.

2) CONSULTATION PROCESS WITH COMMUNITY IMPACTED BY THE PROPOSAL

"The corridor is highly urbanised and extends through one of Sydney's most densely populated and ethnically diverse regions".

The program of consultation with community members who are affected by this proposal is inadequate and limits the ability to adequately understand and comment on the impacts of the proposal. The exhibition time of four weeks for the three volume report prepared by the Department of Transport for NSW is too limited, given the ethnic diversity of the suburbs affected. The Report was released on 20 June 2018 and the first public consultation session was three days later- which is simply too short a time frame for many community members to know about the session.

As has been previously noted in my submission to the Sydenham to Bankstown Corridor Proposal, the ethnic diversity of residents and other community members (eg shopkeepers, business owners, sporting, community and religious groups) requires a careful communication process and an effort to actually engage on an ongoing basis with a significant number of ethnic groups (eg through local language newspapers). This has not been adequately achieved in this process. In particular, the loss of a direct link to St Peters, Erskineville and most importantly Redfern particularly for the Sydney University students from the corridor may not be understood, as well

as the impacts of construction and the structure of the Metro with changes to seating capacity and standing room.

3) IMPACTS OF CONSTRUCTION

The revised Preferred Project proposes to **close up to 3 stations for up to 2 months** for station construction. Any relief given in reducing the number of weeks originally proposed for possession during the school holidays (from 2 weeks July and 6 weeks during Christmas holidays) has been lost due to the additional 8 weekend possession periods added plus night time week day possessions together with the proposed closure of up to 3 stations for up to 2 months. No information exists if this closure of the stations is a yearly event or one off occurrence.

The Temporary Transport Plan (TTP) has been amended to take passengers during construction by bus to the T2 Innerwest and Leppington Line together with the original EIS proposal of taking passengers to the T8 Airport and South Lines. The traffic assessment with the revised Report, does not appear to analyse the TTP or the amended TTP despite this being a major change. No information exists as to what the views of the Georges River Council, the Inner west Councils and the local Members of Parliament for Oatley and East Hills are in relation to the burden of the Temporary Transport Plan on their constituents and the amenity of their area. It is critical to obtain proper traffic analysis due to the fact that up to 100,000 commuters from the Bankstown Line will be placed on buses each day during the conversion process.

4) HERITAGE CONSIDERATIONS

It is noted that the revised plans reduces potential heritage impacts on the affected railway *stations*, which are each listed in Local Environmental Plans and with three stations listed as State Heritage Items. It is critical that the station buildings be protected and changes minimised to these listed items. The proposal to re level the platforms of the stations may potentially affect their significance and there appears to be no peer review of the architects that have been engaged by the Sydney Metro to undergo this work. The same architects have been retained to do the revised project work for the South West Metro.

The Sydenham to Bankstown Corridor has numerous other heritage items and *potential heritage conservation areas and urban character areas* which have never been adequately assessed nor formally listed. It is critical that there be a comprehensive review of the entire Corridor to ensure that there is consistency in what is conserved between the two affected Councils (Inner West and Canterbury-Bankstown).

5) BANKSTOWN TOWN CENTRE

Of critical concern is that the premier Town Centre of the Metro line- Bankstown, has not been adequately planned for in this revised proposal. In particular Bankstown Station will be totally dislocated and unsafe under the current proposal to build a Metro Station as there will be a walkway of at least 400 metres in length that commuters must now use. There has been no analysis of the fact that 19,000 commuters will use Bankstown as an interchange (changing from the Western section from the stations of Carramar, Villawood, Chester Hill Yagoona, Berala, Birrong, Yagoona) to Bankstown.

The former administrator for the Canterbury Bankstown Council summed up the concerns in the SMH on 29 May 2017 as follows:

The plans are impractical and unsafe. There is no integration with the town centre or an attempt to make the station a visual feature of our city.

Mr Colley said the plans instead featured a “*convoluted ramp system*” with only two access points and a new Metro entrance tacked onto the existing station which would create a long walk for commuters and act as a barrier between the north and south ends of Bankstown Centre.

The published analysis of commuter time savings from the Metro are not supported given the additional time taken for commuters to navigate the ramp system of the Bankstown twin stations interchange.

SUMMARY

The proposed conversion of the T3 Sydenham to Bankstown heavy rail line to a Metro has many short and long term impacts which bring to question the justification for this significant transport project, in light of the fact that this is a *conversion* of an existing functioning rail line and its construction will alter the functioning of the remainder of the heavy rail line. Whether residents and the broader community have been adequately engaged, understand and actually endorse the project has not been clarified. The full Business Case has not been released to the public and impacts of project changes to the project, on the Business Case are not clear. There is a blurring of the boundary between the provision of the line itself and the role of the Metro as property developer which raises concerns to many members of the public. In the Sydney-wide context, the Metro takes primary place in a network of major transport changes which are being rolled out in quick succession irrespective of their costs and benefits to the community of Sydney. Some of these projects (eg the George Street Light Rail) have faced significant problems due to inadequate preparation, background research and communication between relevant parties. These are critical projects and will cost taxpayers for decades to come, so a clear understanding of ALL potential impacts must be in the public discourse. One positive point has been the decision to retain the existing heritage listed rail stations as part of the new Metro; this now needs to be complemented by an actual heritage assessment of other items affected on the broader Corridor.

Yours faithfully

Luci-Anne Kreller