

# KOAS

Keep Our Area Suburban

17 July 2018

PO Box 92  
Belmore NSW 2192

The Secretary  
Department of Planning and  
Environment  
GPO Box 39  
Sydney NSW 2001

Dear Ms McNally

***Re Amended Infrastructure and Submissions Report***

We refer to the abovementioned and to our original submission dated 1 December 2017 and in this regard make the additional comments and observations:-

We express concern at the fact that the Amended Infrastructure and Submissions Report was released on 20 June 2018 and the first public consultation session had already been organised and advertised to occur as early as Saturday 23 June 2018 from 10am to 2pm at the Bankstown Arts Centre.

What is more alarming is the exhibition time of 4 weeks to conclude on 18 July 2018 has not allowed for sufficient time to analyse and digest the 3 volume ( in hard copy format) report ( being 11 cms in thickness and weighing approximately over **7 kilograms in weight!**) released and prepared by Department of Transport for New South Wales.

This process is highly flawed ( as was the EIS process conducted in 2017) in that the key stakeholders being shopkeepers, the directly affected commuters and directly affected residents within a 300 metre radius of each of the railway stations between Sydenham to Bankstown appear to have not been liaised with at all and or have been given scant information as to the true affects of the construction effects during conversion and also the after affects of utilising a single deck metro train with 35% seating capacity and 65% standing room and the loss of their direct route to the city circle link. This is in addition to the loss of direct links to St Peters, Erskineville and most importantly Redfern particularly for the Sydney University students from the corridor.

Furthermore it is the writer's opinion that it appears that many of the issues raised by interested parties who made submissions to the EIS have remained unanswered and or have been given scant/dismissive and or little explanation in the documents placed now before the public for perusal.

The changes that have been to the current preferred project have been sarcastically dubbed the *Metro Light* however the overall effects of the project remain of serious concern.

We outline our specific concerns as follows:

#### **New Preferred Project Requiring New EIS Process, Consultation and Revised Business Case.**

We are of the view that this is a totally new project and as such requires a new exhibition process to be undertaken and not be subjected to the current process of exhibition.

We are also concerned that the Business Case which for the most part has never been released in full (due to major redactions) cannot be applicable to what appears to be a scaled down version of the Metro to the Metro Light. We would request details as to what information( if any) has been provided to NSW Treasury in relation to this scaled down project and what impacts has this had on the original Business Case as was used to justify the level of taxpayer funds to be expended.

Even though the Department of Transport appears to have repackaged the Metro into the *Metro Light* for political and community acceptance by the non demolition of heritage platforms, reduced removal of valuable vegetation, retaining existing entries to most railway stations and what is an apparent artificial and misleading reduction in the shutdown period for conversion, the **effects on the travelling commuter and the residents and shopkeepers nearby remain very real and problematic.**

#### **Lack of Proper Consultation with Key Stakeholders**

The corridor the subject of the EIS and Metro proposal has been described by NSW Department of Planning as part of their documentation on the Sydenham to Bankstown Urban Renewal Strategy as follows:

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

It is due to the above description that extra care should have been taken by the NSW Department of Transport in explaining to the residents, the shopkeepers and the commuters the real impacts of the project rather than provide them with glossy brochures full of spin and promotion.

What is of particular concern is the reference to the small business package in the EIS which appears to have had no consultation with the shopkeepers and or landowners who will be directly impacted by the effects of construction of the conversion of the T3 line from heavy rail to Metro. The NSW Department of Transport has failed to adequately compensate and inform shopkeepers and

landowners of the effects of the Light Rail. It seems that history appears to be about to be repeated with this project.

### **Non Publication of Bankstown Station in Preferred Infrastructure Report Overview June 2018 and Interchange effects-“ Impractical and Unsafe”**

We raise concerns due to the fact that the Bankstown Station has been omitted from this report. Furthermore what is disturbing is that there appears to be no analysis or comment about the fact that the Bankstown Station will be totally dislocated and unsafe with the current proposal to build a Metro Station ( in addition to the existing heavy rail station) to the East which will lead to a walkway of at least **400 metres in length** . 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.*

Further on in the article the following is stated:

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( due to Metro change) will be totally debunked if the real analysis of loss of time for commuters due to the impractical and unsafe convoluted ramp system was made of the proposed **Bankstown twin stations interchange**.

### **Gridlocked and Unworkable – Dire warning from former top executives of NSW Transport.**

Former rail executives Messers Brew, Christie, O’Loughlin, and Day in a critical 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**) make damning comments which appear to be completely lost on senior personnel in charge of the South West Metro.

These former rail heavyweights warn 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.*

It is of concern that none of the above appears to have been referred to in any of the material produced in relation to the South West Metro EIS consultation process.

The fact that 19,000 commuters have been left out of the time savings analysis for conversion of the line is very concerning.

As a community group we would welcome the Minister for Transport's response to the submission made by Messers Brew, Christie, O'Loughlin, and Day (dated 3 July 2015) as a matter of urgency in order to restore public confidence in this process.

#### **Heritage Analysis and effects on heritage buildings and places**

We note that the kiss and ride kerbside facilities are proposed to the Tobruk Avenue Belmore corner despite our submission of 1 December 2017 stating that a sign exists at this corner explaining in great detail the significance of the approach walkway from Belmore to Campsie being in dedication to the heroic efforts of the Australian troops in defending the town of Tobruk Libya during 1941.

This is a place of historical significance and we respectfully suggest that this proposal be removed and relocated elsewhere and that the NSW Department of Transport respect the military history of our suburb.

We are concerned that there is now a proposal to re level the platforms of the stations. What is of concern to what is now being dubbed "*burying the platforms of our heritage train stations like Pompei*" is that 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 preferred project heritage report fails to take into account the existence of non statutory lists such as the National Trust Register or the former register for the National Estate. It fails to mention

or take note of the draft heritage listings such as the heritage conservation proposed for Hurlstone Park.

### **Station Train Closures, Traffic Analysis, and Temporary Transport Plan.**

We note with concern that the revised Preferred Project now 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) have been dissipated now 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 to occur on a yearly event or one off.

This is a worse situation for the commuters and nearby residents alike from the original EIS as exhibited.

We note that the Traffic Transport and Access Assessment prepared for the revised project is highly flawed. Page 6 of Appendix D states the following:

*"To determine a suitable factor the traffic volumes in the project area were determined"*

However of the 6 locations chosen to determine traffic trends **none** were not in the metro project area. It is stated that they were chosen on the basis of proximity to the project area. The suburbs are not listed however they are the following: Wolli Creek, Clempton Park, Roselands, Lakemba, Narwee and Bankstown. The suburbs of Sydenham, Marrickville, Dulwich Hill and Hurlstone Park are not close to these chosen locations.

We also note that the Temporary Transport Plan (TTP) has now been amended to take passengers 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 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 Innerwest Councils and the local Members of Parliament for Oatley and East Hills 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.** This is 5 times the number of commuters that will be affected by the shutdown of the Chatswood to Epping line on 30 September this year.

### **Footprint of Metro**

The footprint of the South West Metro remains unchanged which leaves an inference to be made that the original project as exhibited with the EIS in 2017 may be renewed at some time in the future.

### **Council and other property concerns**

Concern still exists that no details have been given as to which land and commuter carparking areas belonging to or being managed by Councils will be utilised as part of the project. Concern that valuable open space parkland( belonging to the former Canterbury Council and now Canterbury Bankstown Council) continues to be included as part of the footprint for the project area such as Warren Reserve in Punchbowl. We are also concerned that Sydney Metro are still wanting to utilise the Canterbury Bowling Club for purposes at odds with the current zoning. The Club rezoning was part of a controversial rezoning process by the now disgraced former Canterbury Council which is now the subject of a lengthy ICAC investigation/public inquiry.

### **Over Station Development**

We reiterate our concerns in relation to over station development and we point out to the Fine Grain Analysis' for Lakemba, Belmore and Campsie produced by the Office of the NSW Government Architect in documents released in 2017. These documents clearly show an intent to develop highrise towers within the corridor. For example in the Lakemba Fine Grain analysis document drawings detail a tower on the northern verge ( within the corridor) labelled TFNSW development land on page 35 and the following is stated on page 25:

*A significant development opportunity is located eastern side of Haldon Street, utilising the land either side of the rail line and the air space over the rail line. It is recommended that this could accommodate a significant tower structure becoming a marker building within the context akin to the Forum development at St Leonards*

We note the following from the Submissions Report page 5.26

**Transport for NSW is not proposing to deliver any residential developments or overstation development as part of this project. Any future development would be subject to a separate assessment and planning approval process.**

We note that 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.

It remains of tremendous concern that Sydney Metro may be sold to a company such as MTR Corporation which is 79% owned by the Hong Kong Government ( AKA Chinese Government) who in turn will develop within the corridor and not be subject to public or parliamentary scrutiny.

MTR we understand will run the SW Metro and concern continues as to why it is that a public heavy rail line is to be converted to a Metro and effectively privatised with little or public discussion in relation to this aspect.

We further note the comments made by former Mayor of North Sydney Council, Genia McCafferey on 12 July 2018 in the SMH article in relation to Council's opposition to the proposed 42 storey tower on top of the Victoria Crossing Metro station at North Sydney :

*The job of Sydney Metro is to build a metro, not to be a private developer*

We also refer to recent comments by the former head of the Hong Kong Housing – Mr Anthony Cheung appealing to the Hong Kong government not to give exclusive property rights to MTR corporation at the new Metro stations.

There is no information or assurance as to exactly what will be MTR Corporation's role in the SW Metro corridor if and when it begins the operation of SW Metro.

We note that the Premier met with MTR Corporation LTD representatives on 13 March 2017 "to discuss MTR business activities in NSW." We would be pleased to be advised as to the exact nature of these business activities that were discussed and whether overstation development and or the involvement of MTR Corporation was an option.

In conclusion we feel that the revised project has not addressed the primary concerns in relation to the privatisation of a perfectly functioning heavy rail line that has been in existence for more than 122 years. We feel that the environmental and social impacts of such a conversion do not warrant the Minister for Planning in approving this project. It is simply a catalyst for high rise development along the corridor and appears to be based on the Hong Kong model of the Metro – high frequency in high densely populated areas built around towers to feed the patronage thirst of the Metro operator. MTR Corporation we feel may become the property arm of the NSW Government in developing and selling development in the Sydenham to Bankstown Corridor. It appears that the expert warnings of the former chiefs of the NSW Transport in a submission dated 3 July 2015 have not been addressed and more importantly heeded. The public are entitled to a full explanation as to why this project was announced with much fanfare in October 2015 when the submission of Messers Brew, Christie, O'Loughlin, and Day dated 3 July 2015 would have been in circulation within the NSW Department of Transport. This submission and their concerns as outlined above have not been addressed at all and this in itself leads to a total lack of public confidence in the project. We urge the Minister for Planning not to approve this project as it is against the public interest.

Yours faithfully



For and on behalf of KOAS