



INNER WEST COUNCIL

25 July 2018

Carolyn McNally
Secretary
Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Attn: Naomi Moss

Dear Ms McNally

**Re: Sydney Metro City and Southwest Sydenham to Bankstown Upgrade -
Submission on Preferred Infrastructure Report**

At its 24 July 2018 meeting Council resolved that:

- 1. Council reiterate our view that the case for the Sydney Metro Sydenham to Bankstown has not been adequately made. Our community is not prepared to accept the disruption that would be caused by this project, that we are not convinced will benefit our community or Sydney as a whole;*
- 2. Council suggest the State Government build new rail services to suburbs that don't currently have them rather than converting existing commuter rail services from one rail mode to another rail mode;*
- 3. Council point out to the Department of Planning that simply reiterating the reasons for the project in the "Preferred Infrastructure Report" has, surprisingly, has not changed our minds;*
- 4. Given the appalling record of the State Government in managing infrastructure we also fear there will be a construction blowout;*

In addition to the above resolution Council forwards the following submission on the Preferred Infrastructure Report (PIR) for the Sydney Metro City and Southwest Sydenham to Bankstown Upgrade:

Inner West Council does not believe that the case for the Sydney Metro City and Southwest Sydenham to Bankstown has been adequately made and opposes the Sydenham to Bankstown Corridor Strategy. At its meeting on 24 October 2017 Council called on the NSW Government to abandon the Strategy, given concerns about impacts on local character, heritage, existing affordable housing and the lack of provision of community and State infrastructure.

Council supports Sydney Metro's proposal to recognise the heritage significance of many of the station buildings along the route and appreciates the extent to which Sydney Metro has endeavoured to modify the project to address many of the issues raised during the EIS

exhibition. However, concern is expressed that some of the proposed changes may result in new issues/impacts.

As outlined in Council's previous submission, on the Environmental Impact Statement (EIS); while Council recognises that the upgrading of the T3 line to a metro standard will increase frequency and connectivity, preference should have been given to the provision of a new service and alignment which would cater for areas currently deficient in public transport accessibility.

If the NSW Government is determined to press ahead with the Strategy, in the face of Council and Community opposition, then the cumulative impacts of the Metro and the Strategy need to be more adequately addressed. Should the alignment, as proposed in the PIR, no longer be negotiable, Council wishes to ensure that the greatest benefits are obtained for the Community, with nil or minimum negative impacts. Further, in some cases proposed actions to counter concerns raised have the potential to create new issues or increase the magnitude of other issues (e.g. reduction of the duration of the heavy rail possession period - closure of the T3 line for periods of time - may result in a need for additional night works, which may affect local residents).

Consequently, the following concerns are raised regarding the PIR, and Sydney Metro is asked to address these prior to proceeding with detailed design of the project:

- **Active Transport**

- removal of the proposed Greenway Southwest (active transport facility within the rail corridor) represents a significant reduction in the future active transport capability of the project and the Sydney Region as a whole. It is considered that the separated cycleway, provided by Greenway Southwest, would be a significant active transport link within the regional network and increase safe usable connectivity between the metro, adjacent areas and Sydney's active transport network. Consequently, it is requested that Sydney Metro reconsider the provision of the Greenway Southwest as a critical piece of regional active transport infrastructure. Should the Greenway Southwest be removed from the project Council requests that the State Government funds a viable alternative separated active transport facility to satisfy the same future demand as the Greenway Southwest and that this facility should be developed in close consultation with relevant Councils, the local community, TfNSW and RMS;
- While the PIR proposes the development of a *Walking and Cycling Strategy*, there is no indication of this project's funding or associated implementation mechanisms. Consequently, Council requests that the State Government guarantee funding of the Strategy and implementation of its recommendations as part of the Sydney Metro Project.

- **Open Space**

- loss of various areas of open space along the corridor significantly reduces opportunities for place making, public domain and public art enhancement. Council requests that the project design be reconsidered to provide opportunities for such improvements.

- **Station Design and Accessibility**

- While Council Officers recognise that a straightening of platforms would provide the most reliable accessibility. It is accepted that the proposed active and passive gap-filling mechanisms should provide DDA compliance with a lower level of disruption to passengers and nearby residents;

- Council requests that proposed treatments around both Marrickville and Dulwich Hill Stations should be revisited, in consultation with Council, to ensure that the design outcomes provide a safe and friendly environment cognisant of the heritage value of the stations and the needs of the adjacent community. In particular concern is expressed over the loss of the previously proposed shared zone in Station Street, Marrickville and the need to ensure high quality pedestrian and cycle access to all stations;
 - it is considered that the previously proposed entrance to Dulwich Hill Station from Ewart Lane would provide significantly enhanced access for residents to the south-west of the station, alleviating the need to climb the hill to the current station entrance. Consequently, Council requests that this entrance be included in the project;
 - Council requests that specific reference be made to its Draft Dulwich Hill Station Master Plan, which has been endorsed by Council and received 92% community support during its public exhibition;
- **Biodiversity**
 - clarification is sought regarding the degree of protection afforded to existing areas of Turpentine-Grey Ironbark open forest, Broadleaved Ironbark-Grey Box and Downey Wattle. Further, Council has concern over any loss of native vegetation and expresses the view that in many instances remotely located biodiversity offset areas are inappropriate;
 - Council expresses extreme concern over the loss of 503 trees and requests 2 for 1 replacement of any trees lost as a result of the project.
- **Flooding, Drainage and Stormwater**
 - Council expresses concern that the flooding, drainage and stormwater assessment provided in the EIS was inadequate and it is considered that the proposed revised mitigation measures are insufficient. Consequently, Council requests that comprehensive stormwater modelling should be conducted to provide an evidence-based assessment of all issues and that Council Officers be consulted prior to finalising any mitigation measures.
- **Construction Impacts**
 - Council requests that the Draft Construction Traffic Management Plan be prepared in close consultation with Council and the Community prior to being exhibited;
 - concern is expressed that reducing disruption to rail services (reduced periods of rail line possession) has the potential to require an increased number of night-time construction hours. It should be noted that there are several sensitive residential areas near the corridor which would be detrimentally affected by any night-time operations. Consequently it is requested that:
 - no night-time, noise producing, activities be carried out after 10 PM;
 - should such activities be deemed essential, residents should be consulted well in advance of the activity and all measures possible be implemented to minimise any inconvenience to residents;
 - while the PIR project description suggests that it will require reduced periods of line possession (closure of the T3 line) reference is still made to the need for a “Final Possession” period of three to six months, once the stations have been upgraded. Concern is expressed that this lengthy period of possession will impact on public transport patronage, potentially diverting people to private car use (possibly in the long term). Consequently, it is requested that opportunities to reduce this possession period should be further examined and, should prolonged periods prove essential, a detailed public transport response should be provided and clearly communicated to the travelling public;

- there does not appear to be detail on potential disruption to traffic flows, bus movements and active transport accessibility created by construction activity. Council seeks extensive consultation on measures to minimise any such inconvenience associated with the project's construction activity;
 - while it is recognised that the proposed extension of the haulage route along the Illawarra Road will negate the need for sections of Marrickville Road, Jersey Street and Warren Road to be used, it is essential that a detailed analysis be carried out on the likely impacts of the extended route, particularly on adjacent residents, businesses, public and active transport;
 - with numerous major projects in the Inner West construction noise has proven to be a major disruption to the quality of life of local residents. Council's recent experience indicates that the proposed 30 decibel (above background noise) threshold for significant amelioration is too high and does not adequately reflect impacts relating to projects with long construction periods (which may have slightly lower levels of noise for much longer periods). Consequently, Council requests that an expert advisory group be established (including Sydney Metro, DPE, TfNSW, Sydney South West Area Health Service, as well as Council and community representatives) to develop protocols and responses suitable to the project's long term construction period and extended noise/vibration impacts;
 - as lack of coordination between utility service providers regarding upgrades associated with major infrastructure projects (such as Sydney Metro) has the potential to result in unnecessarily lengthy construction/reconstruction activity impacting on residents, it is requested that (similarly to the M4-M5 link project) Sydney Metro provide a:
 - Utilities Management Strategy;
 - Utilities Works Manager.
 - a single point of community contact must be established, in the form of a community liaison coordinator, to ensure the concerns of local residents and business are dealt with in a transparent, efficient and timely manner.
- **Relationship to Sydenham to Bankstown Urban Renewal Corridor (SBURC)**
 - it is requested that a higher level of coordination be clearly visible between the metro project and the SBURC. It is considered essential that both of these projects interface with each other and with adjacent land uses, in order to ensure that the vitality of the adjacent area be maintained (including catering for local businesses, public domain works and creative industries/activities);
 - concern is expressed that the level of integration between the metro and SBURC is insufficient as the metro project appears to be progressing well in advance of the SBURC and no information on the renewal corridor has been publicly available since the exhibition of the draft strategy at the end of 2017;
 - it is considered that the cumulative impacts associated with the simultaneous development of the metro and the SBURC (particularly in relation to construction traffic) have not been adequately addressed. Consequently, it is proposed that, in addition to the metro's proposed Construction Traffic Management Plan, a corridor-wide construction strategy should be developed (in consultation with Council, DPE, Greater Sydney Commission, RMS and TfNSW).
 - **Coordination of Activities**
 - Council requests that a formalised group be established to continue discussions as the project progresses into detailed design and that this working group should address issues including:
 - construction traffic management;
 - maintaining accessible, reliable active and public transport both during construction and subsequent to opening of the metro;

- mitigation of construction impacts, particularly on local residents and businesses;
 - opportunities to enhance active transport links, to, through and adjacent to the project;
 - potential for future place making and public domain initiatives;
 - hydrology, flooding and drainage;
 - environmental sustainability and biodiversity.
- Parking associated with both the construction and operation of the Project should be coordinated through an appropriate Parking Management Plan. This Plan should be jointly developed with Council Officers and its recommendations should be implemented to coincide with the project's progress in a manner which counters any impacts associated with the project.

Further, Council considers that; where the Sydney Metro builds brand new rail lines to suburbs that don't currently have them, it represents an improvement to Sydney's mass transit network. Where it converts existing heavy rail lines to metro it is failing to expand Sydney's rail network, thus preventing a shift toward sustainable travel from private car dependency.

Should you have any questions regarding this submission please contact Council's Strategic Transport Planning Team Leader, Ken Welsh, on 9392 5731.

Yours sincerely

A handwritten signature in black ink, appearing to read 'David Birds', with a stylized flourish at the end.

David Birds

Group Manager – Strategic Planning