



# INNER WEST COUNCIL

27 June 2016

Director, Infrastructure Projects  
Major Projects Assessment  
Department of Planning and Environment  
GPO Box 39, SYDNEY, NSW 2001

Dear Director Infrastructure Projects

## **SYDNEY METRO - ENVIRONMENTAL IMPACT ASSESSMENT**

Please find attached Inner West Council's submission on the Sydney Metro Chatswood to Sydenham Environmental Impact Statement.

Should your office have any further enquiries please contact Simon Lowe on 9335 2245

Yours sincerely

Simon Lowe  
Strategic Transport Planner, Marrickville  
Inner West Council

### **Customer Service Centres**

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Whilst Council supports the Sydney Metro project overall, there are concerns regarding numerous elements of the project outlined in the EIS; this submission focuses in particular on implications for flooding and surface transport. Despite efforts by Sydney Metro to liaise with Council prior to the exhibition of the EIS, outcomes of discussions that have taken place appear not to be reflected in the exhibited material.

### Strategic Context

The EIS's indicative construction timeframe is noted, highlighting the need for careful co-ordination of timing all stages of Metro with the NSW Government's Sydenham to Bankstown Urban Renewal Corridor Strategy to ensure new development does not run too far ahead of Metro implementation and to ensure that the necessary period of the closure of the Bankstown line does not cause undue disruption.

Council has no plans to amend the zoning of the Marrickville dive site or its surrounds. Notwithstanding, the NSW Government has approved the following developments within proximity of the dive site: expansion of the Marrickville Metro shopping centre on its existing site and the adjacent site on the southern side of Smidmore Street; a large homemaker store on the corner of Edinburgh Road and Sydney Steel Road and; WestConnex Stage 2, which includes a widening of Campbell Street/Road and associated impacts on Camdenville Park.

Whilst acquisition of industrial lots is recognised as a necessary action to progress this project, this must be carried out in a way that the number of lots acquired is minimised and landowners and businesses are duly compensated.

Council encourages the addition of an extra new station be included as part of the project, located between Waterloo and Sydenham Stations. The Alexandria/Ashmore areas continue to experience significant employment and residential growth; an additional Sydney Metro Station in this vicinity would allow access to increased employment opportunities in the Southern Sydney employment area and provide much needed public transport connectivity for residential growth already occurring in this precinct.

### Heritage

The EIS states that the visual impact on the Sydenham Drainage Pit and Pumping Station, which is listed in the State Heritage Register as well as the Marrickville LEP, would be temporary, yet there appears to be no information about what will replace this visual impact upon completion of construction.

The EIS also identifies a minor visual impact in the case of the tunnel entrance 75 metres away, but again there is an insufficient level of detail to accurately understand the level of this impact. Council requests further information in order to assess the visual impact and concurs with concerns raised by the Office of Environment and Heritage (OEH) regarding archaeological impacts and a need for the imposition of standard conditions to this end.

### Flooding

The assessment of flooding does not meet the Secretary's requirements. The EIS has not completed sufficient analysis to characterise the flood impacts of the project around the Marrickville dive site. The report goes so far as to say this on page 830 and then goes on to state that there may be adverse impacts on page 832. The flooding situation at this location is complex and requires more planning prior to consent being granted, or the imposition of conditions to this end. A separate technical report is warranted to identify mitigation options. Additional drainage infrastructure is

needed between the dive structure and Edgeware Road (south) as well as underneath the existing rail tracks to Bolton Street connected directly to the Eastern Channel or Sydenham Basin in order to mitigate increases in flooding caused by the project.

#### **Section 21.4**

The Marrickville dive structure conflicts with a stormwater culvert, which drains an upstream catchment of 50ha; very broadly an area spanning from the dive structure up to the Princes Highway to the north and east. As a result of this conflict, the existing stormwater culvert, from Edgeware Road to Murray Street, will have to be reconstructed along a different alignment for a length of at least 250m and must occur before any excavation of the dive structure takes place.

No details of any proposed works are provided in the EIS despite the inevitability of the works required. Given the flat topography, shallow outlet structure and subsequent lack of grade, it is essential that further planning and design is undertaken to see if there actually is a feasible remedial option, otherwise the project will result in increased flood risk and damages to residents and road users.

#### **Section 21.5**

The report identifies increases in flood depths in Bolton Street and to the existing commercial premises. No mitigation measures are proposed at this location. The report states that "Given that the increase in flood levels would only occur at areas already subject to flooding, the project...would not result in increased social and / or economic costs to the community as consequence of flooding". Clearly this is not the case as an increase in flood level and frequency will result in increased damages due to flood events.

Figure 21-3 shows no change in flood level near Edgeware Road and Lord Streets, which is grossly misleading. It is incorrect to assume that there will be no impact when a major trunk drain servicing 50ha is demolished. At this location the model used seems to assume no change to drainage upstream of the eastern channel, which is incorrect.

#### **Section 21.8**

The mitigation measures proposed are so broad that it is impossible to measure their potential usefulness. The mitigation measures set out are essentially a collection of statements implying issues will be considered during detailed design, despite no technical analysis having been undertaken to date as to whether any of the mitigation measures are actually feasible.

### **Traffic & Transport**

The proposed upgrade of the Edinburgh Road/Bedwin Road/Edgeware Road intersection shown in the EIS does not reflect Council's comments from previous meetings with Sydney Metro. In line with objectives of the NSW Long Term Transport Master Plan, the intersection must improve pedestrian priority when it is upgraded. The proposed arrangement with three crossing legs on the western side is not acceptable. An acceptable arrangement is suggested in the diagram provided in **Attachment 1** of this submission. Consideration also needs to be given to improving pedestrian and cyclist amenity at the intersection of Bedwin Road and Edgeware Road (south).

As part of the project, and in light of extra construction vehicle movements that are set to take place around Bedwin Road, improvements to Bedwin Road Bridge must be made in order to enable safe pedestrian and cycle movement. The bridge between Campbell Street and Edgeware Road currently has four lanes for traffic, a narrow and unsafe pedestrian footway and no provision for bicycles. It is an important missing connection in regional cycle routes. The works proposed for Campbell Street as part of the New M5 Project in the vicinity of the St Peters Interchange will place even greater importance on this cycle route. A dedicated cycleway is proposed along Campbell Street/Road from Bourke Street to Bedwin Road; Sydney Metro's mobilisation of construction activity along the rail corridor and beneath the bridge presents a unique opportunity to look at adding capacity to this bridge for dedicated cycle infrastructure. Being intrinsically linked to rail infrastructure and active transport would place this well within the scope of this project. This significant opportunity could be realised through cross-government collaboration with SMC.

In addition, construction of a proposed off-road cycleway connecting Edgware road with Sydenham Station adjacent to the proposed dive site should be undertaken as part of this project. This will connect to the existing covered Sydney Water Eastern Channel at the Sydenham detention basin with a link into Garden Street. The existing cycle route travels along roads with a high percentage of heavy vehicles and this is highly likely to be severely impacted by the project with many additional heavy vehicle movements; as such this should take place, as far as practicable, prior to construction commencing. Council will be investigating options for this route in 2016/2017.

Concern must also be noted regarding the proposal for 300 car parking spaces within the Marrickville dive site – this would likely create several hundred daily additional vehicle movements on local roads that are already at or nearing capacity. Whilst there is an acknowledgement within the EIS of the proximity of Sydenham Station and that it may be utilised for employee movements, there is no commitment to this and the provision of such a large car park is only likely to encourage movements by private vehicle; conditions should be placed on any consent to this end in order to encourage fewer vehicle movements to the site during construction and thus minimise the impact on local streets and local residents.

### Construction

Council has concerns regarding the potential noise impacts during the day on St Pius' Catholic School on Edgware Road; the EIS states that the impact of construction on this area is likely to be significant but makes no attempt to reduce or mitigate for this.

Council also wishes to highlight concerns raised by local businesses that may be impacted by the construction compound and associated vehicular movements – this is particularly so for sensitive businesses such as food production. In this regard it is anticipated that their concerns will be duly considered and acted upon.

Council would like to be reassured that there is a transparent process in place for prompt resolution of complaints during construction and operational stages.

Whilst the timeframe of construction is not explicitly detailed in the EIS, it is expected to be synchronous with that of the New M5 WestConnex project. However, within the cumulative traffic impact assessment (p914) there are no mitigation measures proposed and no detailed description behind the statement that 'there is not expected to be any significant cumulative impact when combined with the New M5 Project'. The other aforementioned approved planning projects in proximity of the dive site must also be taken into consideration.

It is also unclear whether future scenarios of projected traffic volumes have taken account of all proposed changes in the surrounding area. As part of the approval for the New M5 Project, Campbell Street/Road between Unwins Bridge Road and Euston Road is proposed to be widened and will carry significantly higher volumes of traffic than at present. The operation of St Peters Interchange is expected to significantly increase traffic volumes and travelling patterns on the surrounding road network. These predicted changes should be taken into account to enable a robust assessment of the traffic impact during the construction stages of Sydney Metro.

In addition, there are discrepancies in the predicted LOS for Bedwin/Campbell/UBR/May between different tables within the EIS – this raises concerns as to how accurate any of the predictions are; conditions ought to be placed on any consent to ensure that local traffic conditions do not become significantly inferior.

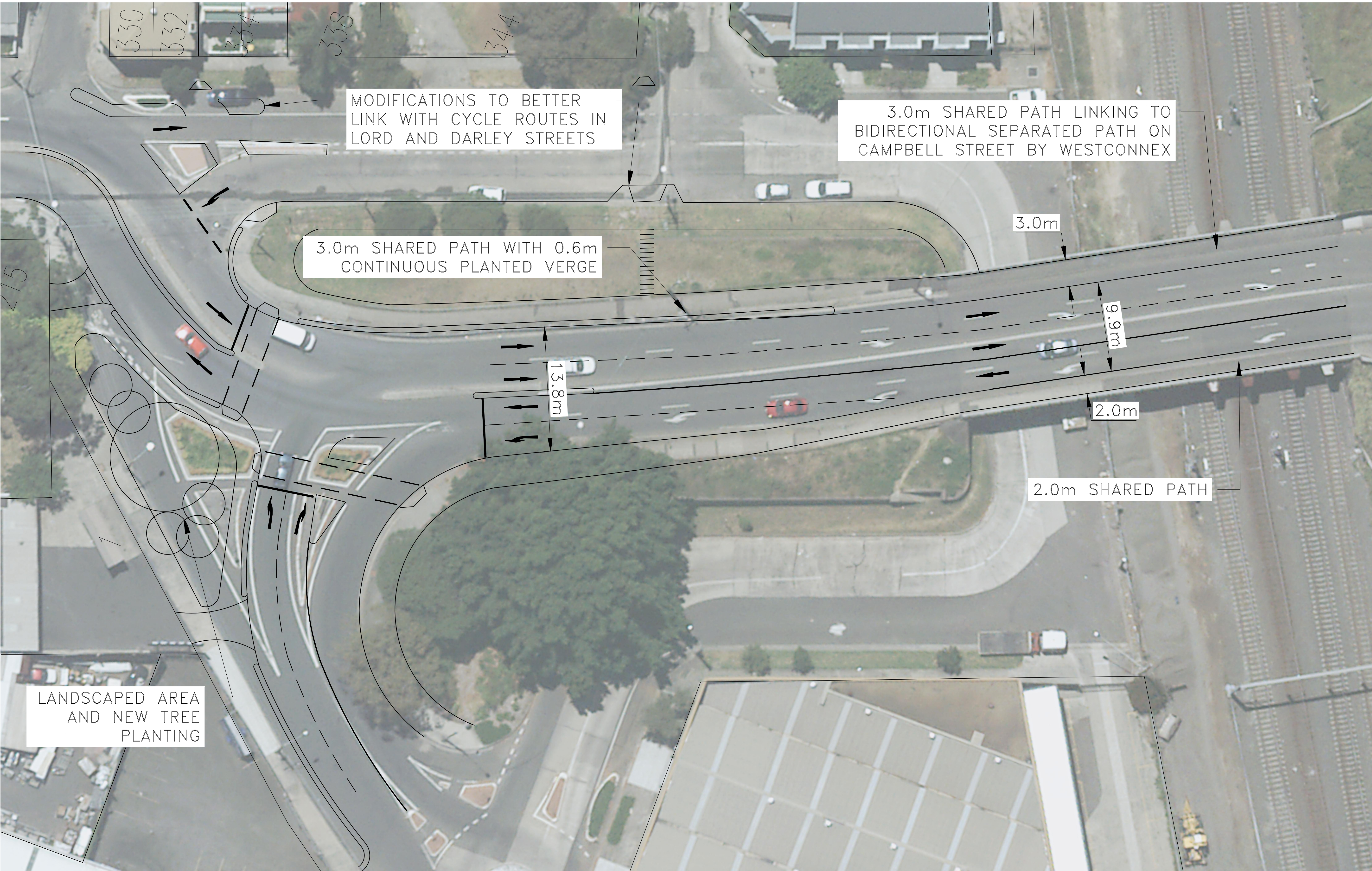
Depending on construction timeframes, construction traffic should utilise a widened Campbell Street/Road rather than May Street to enter and exit the construction site.

Traffic Management Plan with TCPs should be prepared for both long term and short term events.

Swept path assessments should be undertaken to ensure that the largest construction vehicles are able to access and negotiate required local roads and intersections, without causing damage to kerbs or impacting significantly on other road users.

Temporary pedestrian crossings should be designed to the same level of safety and protection as permanent marked pedestrian crossings. Temporary ramps should be provided along any alternative pathway where ever necessary.





CHECKED & APPROVED	SURVEYED & DRAFTED	QUANTITIES	SERVICES AFFECTED	S.R.A. / SURV. GEN.		SERVICES		DATUM		INNER WEST COUNCIL	FILE NO.	SHEET NO.
	-			R.T.A.	TELECOM/OPTUS	—T—T—T—T—	A. H. D.					
	-			A.G.L. / SHELL PIPELINES	GAS	—G—G—G—G—						
	DESIGNED			SYDNEY WATER	SEWER	—S—S—S—S—						
APPROVED FOR CONSTRUCTION	-	TELSTRA / OPTUS	WATER	—W—W—W—W—		SCALES (ORIGINAL A1)		PLAN FOR SYDNEY METRO EIS	PLAN NO.			
	-	SYDNEY ELECTRICITY	RAILWAY	—R—R—R—R—			EDINBURGH ROAD AND BEDWIN ROAD					
		NOTICE OF ENTRY	ELEC. CABLES	—E—E—E—E—			INTERSECTION UPGRADE					
	DRAWN	KERB & GUTTER	OIL PIPELINES	—P—P—P—P—				CAD FILE				
	RH JUN 2016	NOTICES	DATE	STORM WATER	—SW—SW—SW—		AMEND	DATE	DESCRIPTION	APPROV.		