

10 August 2017

Transport Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Lisa

**SYDENHAM STATION AND SYDNEY METRO TRAINS FACILITY SOUTH MODIFICATION
REPORT**

Please find attached Inner West Council's submission on the Sydenham Station and Sydney Metro Trains Facility South Modification Report.

Council requests that it continue to be engaged regarding any further proposed modifications to this project.

Should you have any further enquiries please contact Simon Lowe on 9335 2245.

Yours sincerely



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Inner West Council Submission on Sydenham Station and Sydney Metro Trains Facility South Modification Report

Whilst Council supports investment in public transport in principal, there are concerns regarding numerous elements of the project outlined in the Modification Report; 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 Modification, numerous issues within the exhibited material remain unresolved.

Land Use

- Council is concerned over the significant loss of employment, industrial and in particular creative uses in this precinct that have been forced to relocate as a result of the Marrickville Dive Site/ Sydney Metro Trains Facility South. It is noted that the modification report states that “the design of the Sydney Metro Trains Facility South allows for future rail corridor development above and around the facility and the future development potential would allow for the Sydenham Station Creative Hub vision to be realised”. To enable this to be realised, provision for development over the Sydney Metro Trains Facility South that is already committed to should be furthered, with Sydney Metro providing space that will harbour creative industries and enable their return to Sydenham.
- In addition, the area adjacent to the Sydney Metro Trains Facility South is host to one of Sydney’s longest-standing curated graffiti walls. Consideration should be given to how this wall might survive post-construction, but moreover how graffiti as an intrinsic element of the local neighbourhood will be addressed moving forward.

Transport/Traffic

- Council recommends that further consideration be given to traffic arrangements around Sydenham Station, with the primary aim of improving access to/from and around the station for pedestrians and cyclists. Realignment of the one-way system via Railway Parade and Buckley Street should be examined in the interests of improving road and pedestrian safety and enhancing local amenity. This would potentially enable northbound and southbound bus stops to be located on the western side of the station, adjacent to the new station entry/plaza. In turn this would improve transition for all interchange passengers whilst simultaneously reducing conflict between heavy goods vehicles and pedestrians on Burrows Avenue.
- Additionally, the proposed pedestrian crossing on Railway Parade should be designed so as to achieve optimal pedestrian connectivity and ease of interchange between bus and rail whilst ensuring accessibility for all.
- The report includes commentary that there is “potential for cycle routes along Railway Parade and Gleeson Avenue to be provided by Inner West Council”. P52 of the report identifies that there are poor connections to the station at present and P112 outlines that the modification has been designed to enhance the pedestrian and cycle accessibility of the station. Thus the opportunity must be seized for Sydney Metro to commit to delivering improved pedestrian and cycle routes to/from and around the station as part of this modification, working with Inner West Council to implement effectively.
- There appears to be some contradiction with regard to any impact to on-street parking around the Sydney Metro Trains Facility South during construction periods; this is referred to as ‘no impact’ but also as ‘resulting in additional demand’ in various sections of the modification report. Sydney Metro is to ensure a higher proportion of its workers access the site during construction and operation periods via train (or other sustainable modes) in order that demand for on-street parking from construction workers is negligible.
- The need for a permanent bus layover facility at 117 Railway Road is questionable; should any such changes take place, this portion of Railway Road/Burrows Avenue should be remodelled to accommodate existing parking whilst capitalising on the removed bus stop area on Burrows Avenue in the interests of creating an improved landscaped environment.

- The modification designs should be amended to include a superior active transport corridor route via Frazer Park and the land to the south of Frazer Park, which will provide the desired level of connectivity outlined in the Sydenham to Bankstown Urban Renewal Strategy (unlike the currently suggested route via Marrickville Road/Meeks Road)
- New cycle and pedestrian connectivity around the Sydney Metro Trains Facility South as identified in the Design Guidelines is welcome and should be designed as a whole-of-street approach with opportunities for tree avenue plantings and other relevant streetscape elements.
- Whilst it is noted that the signalisation of the Edinburgh/Bedwin/Edgware intersection was included in the approved project, the designs included in the modification report are not consistent with Council's preferred design outcomes, which would better meet the needs of pedestrians and cyclists at this location and tie in with work to be undertaken by RMS/WestConnex along Bedwin Road.
- There is meagre assessment within the report on cumulative impacts associated with the modification – in particular it should be noted that there will be additional construction traffic for both Sydenham Station and Sydney Metro Trains Facility South elements of the proposal, which have not been quantified in conjunction with other construction traffic impacts from developments such as WestConnex or Marrickville Metro.

Environment

- The proposed 2.5m vegetation buffer around the perimeter of the Sydney Metro Trains Facility South site is welcome; this must be provided in addition to the proposed 4m wide pedestrian and cycle path around the perimeter of the site.
- Environmental impact to the "Meeks Road Triangle" site must be kept to an absolute minimum.
- Areas surrounding the Sydney Metro Trains Facility South that are to experience a negative visual impact during construction should receive a noticeable improvement during operational times. Street designs around the perimeter of the site should be carried out in conjunction with Council and be designed for increased tree canopy, new pedestrian and cycle connectivity, improvements to road layouts and enhanced parking conditions where applicable.
- Visual amenity from Fraser Park toward the rail corridor is stated as being negatively impacted during construction due to the removal of trees from within the rail corridor; visual amenity from this location is stated as undergoing no perceived change during operation, which implies that trees have been replanted and thus views returned to their previous state. However the report also states that no trees from within the corridor are to be replanted, which appears incongruent with the above statement.

Flooding

- The modification report provides scant information regarding flooding, despite being a significant part of the modification. No details of proposed infrastructure are provided and unlike other areas such as noise and traffic, no technical appendix relating to flooding is provided. No afflux diagrams are shown with the exception of what is presumed to be the PMF event. In this context it is hard to comment on the suitability or otherwise of the proposed modifications to drainage and flood management in the area.
- Proposed flood mitigation should consider future plans for the Marrickville valley as set out in the Eastern Channel East Floodplain Risk Management Study and Plan (FRMSP) and Marrickville Valley Draft FRMSP. Specifically attention is drawn to:
 - Lord Street drainage upgrade (Eastern Channel East FRMSP option R1)
 - Murray Street drainage upgrade (Eastern Channel East FRMSP option R8)
 - Industrial area drainage upgrade (Marrickville Valley Draft FRMSP option FM15.10)
 - Bolton Street drainage upgrade (Marrickville Valley Draft FRMSP option FM14.1)

- The works set out in Council's existing plans seek to reduce flood risk rather than maintain it at current levels as per the proposed mitigation measures; enabling works by Sydney Metro should facilitate at least the same reductions as those proposed by these plans.
- The proposed flood mitigation should also consider likely outcomes of the WestConnex work around Campbell and May Street and the Camdenville Basin.
- The detention basin and pump out to Eastern Channel is the only means of draining the low lying areas of the Marrickville Industrial area and Eastern Channel East catchments. Given the 100+ year expected lifespan of the proposed works, consideration should be given to what the 'end state' of the catchment will be and that all proposed flood mitigation options can be accommodated without affecting other areas.
- Particular attention is drawn to the Carrington Road area which is earmarked for significant development (as included in the Sydenham to Bankstown Urban Renewal Strategy) and is susceptible to increased flooding should 'end state' flows exceed the capacity of the eastern channel resulting in and overtopping at this location. The Carrington Road proposal includes an option for diverting a part of the development site into Eastern Channel. It seems that there will be a conflict for the capacity of the lower segment of the Eastern Channel between Sydney Metro and the developer for the Carrington Road site. The drainage proposal from Sydney Metro does not consider such demands for the capacity from the development in the downstream catchment.
- It is noted on P229 of the report that "a proposed raised western channel bank near Tempe Station would keep flows within the Eastern Channel" however this area is not within the proposed modification area, which creates concerns about who would be responsible for this work and whether it would be completed as part of the Sydney Metro works. Imposing future works on Council and/or Sydney Water is not acceptable. It is suggested that the proposed modification area be modified accordingly to include the channel wall raising.
- Any proposed flood mitigation should seek to reduce flood risk in all events up to the 100 year event rather than maintaining them at their current levels as per the proposed mitigation measures. Consideration will need to be given to the segment of Eastern Channel between Sydenham Station and its outlet adjacent to Tempe Station. Further, consideration will also be required to be given to the proposed modification area in addition to the upper catchment with potential diversion options for flood flows following implementation of improvement works at the flood affected areas; consideration solely of the modification area would not address the current and emerging flooding issues in the upper catchment and would also limit opportunities to undertake flood mitigation works in the future.
- P250 includes commentary that "consultation would continue with the WestConnex Stage 2 delivery team in relation to the coordination of flooding and hydrology works in the vicinity of the proposed modification"; whilst this is essential, to date this has been lacking and it is vital that this occurs sooner rather than later.

Strategic Alternatives

- No detailed consideration is apparent within the report in relation to the complex land use responses that are likely to develop as a result of increased accessibility created by Sydney Metro. In particular this includes resultant greater residential densities at the expense of existing employment lands, increased demand for social and cultural infrastructure that would result from increased population and the ability of existing public transport feeder services to accommodate increased demand in order to reduce private car dependency and parking demand.
- With regard to the elimination of options for the new Sydney Metro Trains Facility South, it is noted that Sydenham appears to have been chosen predominantly due to operational efficiency and cost reasons. Council wishes to express concern with regard to the additional reason of Sydenham apparently having the 'ability to provide capacity beyond the requirements of project opening', should this imply future expansion of the site into industrial employment lands that are already under threat.

Urban Realm

- The design principles for Sydney Metro provide a sound basis to guide design of the stations, surrounding environment and other infrastructure required. The concept designs should be further evaluated against these design principles and Council and the public be consulted on these to ensure there is consistency with and appropriate application of these design principles. The planning and design of Sydenham Station and its surrounding environment should also take into consideration the public domain opportunities identified in the revised draft Sydenham to Bankstown Urban Renewal Corridor Strategy (which was released in July 2017 and thus has not as yet been considered in the modification report).
- The creation of entry forecourts/plazas on either side of Sydenham Station is strongly supported to improve the station entry legibility, pedestrian circulation and general improvement of public domain around the station, giving pedestrian prioritisation of space over vehicle space. The new entrances would be highly visible from views along Sydenham Road and George Street thus enhancing station entry legibility. Furthermore, Sydenham Station will finally become an accessible interchange station with the creation of new entrances at the northern end of the platforms. Circulation space at the north eastern entry, both inside and outside of the station boundary appears tight, which will need further consideration to ensure there is adequate circulation space for safety, accessibility and comfort.
- The provision of a pedestrian plaza created by the acquisition of 11 Sydenham Road, connecting through to Garden Street and the Sydenham Pit is strongly supported. This will further enable the Sydney Metro plans for a new pedestrian and cycle route around the perimeter of the Sydney Metro Trains Facility South connecting Sydenham Station with Bedwin Road/Edinburgh Road via Sydney Steel Road. It will also support opportunities for public domain enhancement, open space use and business activation near Sydenham Station and around the Sydenham Pit. The residual land from the acquisition of No. 11 Sydenham Road presents additional opportunity for activation of the newly created plaza areas; in addition, setting back any future development slightly from Sydenham Road could enable an enlarged public plaza fronting Sydenham Road.
- The Sydney Metro Trains Facility South proposals present an opportunity to achieve some of the public domain, connectivity, open space and business activation intentions identified in the Sydenham to Bankstown Fine Grain Study (2016), amongst other studies. There are further opportunities to enhance the edge around the Sydenham Pit to enable its use for passive recreation and to better enable the appreciation and utilisation of this unique piece of infrastructure, reflected in its State Heritage listing. It is identified in the modification report that the new aqueduct could enable public access on top and the redundant pump station could be utilised for a publicly accessible purpose. This is strongly supported, provided that a pathway also allows connection around the north-eastern side of the Sydenham Pit back to Sydney Steel Road, so it is not a terminating path. The design treatment of the aqueduct, new pump station, pit access and landscaping edge around the perimeter of the Stabling Facility is important, especially given the future pedestrian intensification occurring in the area and the intention for this to be developed as an active transport route, as noted previously.
- It is also important to consider the design of the northern end of the Sydney Metro Trains Facility South, which will be located opposite the southern entry to the expanded Marrickville Metro shopping centre.
- A high standard of design and consultation with Council and the public will be required for the concept design to ensure a good outcome is achieved and that impact on the State Heritage items are minimised.
- P52 and P112 of the report acknowledge that the new concourse would provide an important cross-corridor link between Sydenham Road and Sydenham Green, particularly avoiding the need to cross the railway line via Gleeson Avenue, which presents an accessibility barrier. However, plans indicate that this will be a paid concourse, which limits the public nature of the crossing. Provision of an unpaid concourse would be preferable in the interests of improving pedestrian connectivity in the local area for all.

Heritage

- Council is concerned with regard to the significant adverse impacts to heritage items within the modification, particularly the Sydenham Pit, and requests that Sydney Metro continue to work closely with Council on how such items are managed during construction.

Accessibility

- Concern remains with regard to how the DSAPT and DDA requirements are being interpreted and applied across a station that will continue to be operated under two separate systems; clarity is thus requested on how accessible interchange between Sydney Metro and Sydney Trains services at Sydenham Station will be achieved across the station.
- Consideration needs to be given to the issue of glare from glass platform barriers that may obstruct legibility for travellers with vision impairments.
- Additional consideration is needed with regard to tactile ground indicators proposed for use along the platform edges/at gate entry points. DSAPT controls will likely not have given due consideration to new technology such as this during their composition.
- Clarity is sought on service standards and relevant procedures should lifts become out of service.
- Consideration must be given as to how existing infrastructure on the corner approaches to the current station entry will be addressed.
- Any excessive platform cross fall should be corrected.
- Consideration should be given to the management and prioritisation of passenger movement, including lift use and boarding principles, during operational times.
- Additional mobility parking may be required in addition to improved taxi and drop-off locations in the interests of ensuring good accessibility.
- Consideration should be given to the most appropriate location for accessible toilets within the station.
- At present platform 1 at Sydenham Station provides connectivity to the only platforms at Redfern Station with lift access, thereby enabling access to agencies such as People with Disability Australia (PWDA). Removal of this connectivity requires address within the context of the wider network.
- Within section 3.5.3 of the report, please refrain from using the term 'the disabled'; please refer to the NSW Disability Inclusion Act (DIA) and UNCRPD for a clearer understanding of these terms and appropriate use.