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Mr [REDACTED]
[REDACTED]
Transport Assessments
NSW Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Sent by e-mail to: [REDACTED]

Dear [REDACTED]

RE: SSI 17_8256 – Sydney Metro - City & Southwest Project (Sydenham to Bankstown, T3 line upgrade) – Exhibition of EIS

Reference is made to your letter dated 12 September 2017 which contained links to the documents for the above project available on the Department of Planning and Environment's website. The Sydney Metro City and Southwest was declared to be critical State significant infrastructure in December 2015. The Environmental Impact Statement addresses the environmental assessment requirements of the Secretary of the Department of Planning and Environment, dated 23 March 2017.

The Sydenham to Bankstown project, the subject of the Environmental Impact Statement, involves:

- upgrading approximately 13.0 kilometres of the Sydney Trains T3 Bankstown Line (Marrickville to Bankstown inclusive) - 10 existing stations from west of Sydenham to west of Bankstown;
- station upgrades to metropolitan standards;
- meeting legislative requirements for disability access, and
- provision of pedestrian, cyclist, and transport interchange facilities.

There will be additional works within the rail corridor, for example upgrading of existing bridges and underpasses across the rail corridor.

The following reports lodged with the application have been reviewed:

- *SYDENHAM TO BANKSTOWN ENVIRONMENTAL IMPACT STATEMENT - Volume 1A – Parts A & B, Main Volume, Sydney Metro and TfNSW - Main Report (n.d)*
- *Appendices Volume 1C, Sydney Metro and TfNSW:*
 - *Appendix C – Sydenham to Bankstown Design Guidelines, June 2017*
 - *Appendix D – Construction Environmental Management Framework, August 2017*
 - *Appendix H – Urban Design and Place Making Paper, AECOM Australia, June 2017*
- *Volume 4 – Technical Paper 3 – Non-Aboriginal heritage impact assessment, Artefact Heritage, August 2017*

It is noted that other components of the EIS also deal with management of potential impacts on heritage items such as Chapter 12 (Construction noise and vibration) and Chapter 13 (Operational noise and vibration) with respect to management of potential vibration impacts (Technical Paper 2 – Noise and vibration assessment). Heritage buildings would be considered on a case by case basis, with detailed inspections and condition assessments of potentially affected heritage structures undertaken.

The EIS for the project advises that the design process for the project has involved development of Options that were assessed against a range of criteria, including customer focus, constructability, operation, environmental impacts, accessibility, heritage and place-making considerations, risk and cost effectiveness. Options were considered for station designs, constructability, track alignment, temporary transport arrangements, and construction programming. The station design process involved consideration of a range of options, in consultation with heritage stakeholders, to minimise the potential impacts on heritage values. This included refinements to the design to allow the retention of heritage elements where practicable. The design process also involved recognising the important place-making role of the stations, and consideration of a range of options for the design of key elements at each station, to respond to local place, the surrounding urban context, the functioning of local town centres and input from the community. The EIS also advises that Transport for NSW will continue to develop the project to a greater level of detail in conjunction with the appointed design contractor.

Heritage Issues (Non-Aboriginal heritage)

The project area has heritage significance arising from the historical development of the T3 Bankstown Line, and its role in facilitating surrounding land development.

All 10 stations in the project area are heritage listed. Three stations are listed on the State Heritage Register (SHR) - Marrickville (SHR 1186) Canterbury (SHR 1109) and Belmore (SHR 1081) - all listed as Railway Station Groups. The other stations are subject to local heritage listings on local environmental plans and/or a State Agency section 170 heritage register.

The EIS advises (Volume 1, p xvii) that the approach to the design has been to retain as many significant heritage items and/or elements as possible, with particular focus given to items listed on the SHR. Potential adaptive reuse for the retained items would be determined during detailed design. The design process for the project involved significant work to minimise direct impacts to heritage items as far as possible. However, in some instances, to meet accessibility standards and Sydney Metro operational requirements, there has been no alternative to the changes proposed. For example, platforms need to be reconstructed along the alignment to provide safer and easier access to trains.

The main potential for physical impacts to non-Aboriginal heritage would occur during the construction phase. In addition, the project would result in the removal of one or more heritage elements at each station. This is described in the heritage paper as 'a major direct impact' to five stations, including one listed on the State Heritage Register. Impacts include:

- At Marrickville Station, existing platforms would be straightened and extended to the east and heritage station buildings on platforms 1 and 2 would be retained. The major impact involves the replacement of the existing Illawarra Road overbridge which is an item in the SHR Group.
- The heritage assessment describes a 'moderate impact' to Canterbury and Belmore railway station groups (both listed on the SHR). For Canterbury, this may be an under-assessment given that the heritage listed footbridge and overhead booking office would be removed and the brick platforms would be rebuilt and extended. It is noted that the footbridge was modified in the 1940s and the booking office was rebuilt in the 1980s. The heritage assessment argues that the most significant buildings within the Listed Group – the Platform buildings - would be

retained and would be more visible. At Belmore, there would be rebuilding and straightening of the brick island platform.

- There would be major impacts to four locally listed heritage items (Dulwich Hill, Hurlstone Park, Wiley Park, and Punchbowl railway station groups) resulting from the removal of heritage elements associated with these items. Wiley Park and Punchbowl Station would be removed and redeveloped. The heritage report concludes that changes at Wiley Park and Punchbowl railway station groups would be such that in future these stations would no longer meet the threshold for local significance and it would be likely they are removed from heritage schedules.
- Impacts to three locally listed heritage items (Campsie, Lakemba, and Bankstown railway station groups) result from the removal of some heritage elements associated with these items. Much of Campsie Station is removed.
- Changes to Landscape character and visual impacts would include loss of mature street trees providing screening and amenity in the vicinity of stations and introduction of new structures in the visual landscape, including upgraded stations with elevated station concourses and buildings.

The Heritage Assessment (Technical Paper No.3) has concluded that, despite the cumulative impacts from the Metro project mentioned above that 'All SHR stations would continue to meet the threshold for State significance'. It is noted by that such an assessment would need to be made and determined by the State Heritage Register Committee and/or the Heritage Council of NSW.

Overall the project area has a nil to low potential to contain significant archaeological remains, although there may be some remains at Marrickville, Canterbury, Lakemba, and Belmore stations.

Mitigation Measures and Future Management

Environmental mitigation and management measures that would be implemented prior to and during construction and operation are outlined in Chapter 28 of the EIS with key potential adverse impacts requiring mitigation and management summarised in Table 28.3 and Table 28.4. These include implementation of the:

- Sydenham to Bankstown Design Guidelines (Appendix C)
- Construction Environmental Management Framework (Appendix D)

The CEM Framework outlines the approach to environmental management and monitoring during construction. It aims to link the planning approval documentation and the construction environmental management documentation (including the Construction Environmental Management Plan), which would be developed by the construction contractors. The framework details the environmental, stakeholder, and community management systems and processes that would be applied during construction. Specifically, it details the requirements in relation to the Construction Environmental Management Plan, sub-plans, and other supporting documentation for each specific environmental aspect.

Specific Non-Aboriginal heritage mitigation measures are outlined in Table 28.5 as NAH1 to NAH17. These include measures during design and pre-Construction and during Construction of the project. There would be archival recording of directly impacted heritage items (NAH11). Other management and mitigation measures identified to minimise direct and indirect impacts to heritage items include further consideration of detailed design including avoidance (NAH1&2). Where direct impacts are unavoidable, this would include opportunities for the retention, conservation and/or reuse of original and significant heritage fabric (NAH4). Landscape treatments,

architectural design and heritage interpretation would also be incorporated into the detailed design. It is also noted that there would be independent periodic review from the existing Design Review Panel established for the Sydney City Metro & Southwest project (NAH3). Appropriate heritage interpretation would be incorporated into the design in accordance with Heritage Council Guidelines (NAH6). A moveable heritage item strategy would be prepared and a significant fabric strategy (NAH7 & NAH8).

As there would be impacts to significant elements at all listed stations along the line, conservation management plans (CMPs) for SHR listed stations and Conservation Management Strategies (CMS) for s.170 items of local significance would be prepared by the Metro operator (NAH12 & NAH13). These documents would address any changes to the item including updated assessment of significance of elements and recommendations on curtilage changes, for example a possible reduction in curtilage at Marrickville Station resulting from impacts to the Illawarra Road overbridge. The CMP would also provide suggested site-specific exemptions or management policies as relevant for future Metro operations.

An archaeological research design would be prepared and implemented to identify the need for archaeological testing or monitoring across the project. To be supervised by an appropriately qualified Excavation Director (NAH10).

Design Guidelines

The Sydenham to Bankstown Design Guidelines (provided in Appendix C) outline how Transport for NSW proposes to achieve a quality design for the project, which is integrated with the surrounding environment and town centres. The guidelines establish the design approach by guiding the design of the interface between stations and their surrounding locality, including: station entries; transport interchange facilities (bicycle facilities, bus stops, kiss and ride, taxi ranks and connections to existing rail and light rail infrastructure); landscaping and other public domain elements; rail corridor works (cuttings and embankments); station and service buildings.

The guidelines consider the design drivers for the Metro project (efficient and easy travelling experience as part of an integrated transport system with comfort, amenity, safety, accessibility) and the context, landscape and urban character at each station. Section 3.2.3 (p.71) discusses Heritage and Archaeology under the following Principle:

Ensure elements and items of heritage significance are appropriately managed and respected. Identify opportunities for heritage conservation to contribute to the celebration of local identity in station design.

The Guidelines note that Where Sydney Metro intervenes in or interfaces with heritage places (such as platform buildings and overhead booking office buildings), design excellence is to be sought to support inventive, interpretive and contemporary responses to the heritage values of that place; that options for adaptation would be considered where appropriate; that Interpretation should respond to the sites cultural significance and that consideration is to be given to integrating heritage interpretation including public art.

These initiatives are supported by the Heritage Council of NSW. It is considered that new design should respect and celebrate the heritage and sense of place. There should be local character reflected in the differences between individual stations with consideration being given to form, fabric and materiality. Whilst it is positive that heritage items are to be retained, it is important that all opportunities for adaptive reuse of station buildings are pursued as part of this project, rather than the creation of further redundant station buildings. Canterbury signal box is a particularly significant item for which an adaptive reuse should be found.

Conclusion

Overall, it is considered that the proposed mitigation measures identified for the project are appropriate and it is recommended to the Department of Planning and Environment if the project is approved that the Conditions of Approval should ensure the proposed mitigation and management measures outlined in Technical Paper 3: Non-Aboriginal Heritage Impact Assessment, must be implemented. It is considered that for the proposed works to be acceptable, the degree of direct impacts both physical and visual to these items should be mitigated as much as possible.

It is recommended that the CoA should include:

- Significant fabric of the platforms and station buildings that are to be demolished must be carefully dismantled and stored safely in accordance with fabric and salvage strategies for future reassembly and potential reuse in interpretation.
- All works to station groups of heritage significance must be undertaken by skilled tradespeople with experience working on heritage sites, under the supervision of heritage specialists.
- Appropriately detailed site specific archaeological assessment, methodology and research design should be prepared to guide works at station groups with archaeological potential.
- Interpretation should be implemented across all areas of construction (during and after works) where heritage has been removed or impacted assist the public in understanding the heritage impacted by this project.
- Relevant local councils should be invited to comment where local heritage items are affected.

The Heritage Council would like to reiterate the importance and value of involving them as the design for the project advances, to understand and ensure that design options considered will have the least heritage impact. The Heritage Council notes that there is a significant level of work required to mitigate the heritage impacts of the project, and believes that there may still be scope for changes and improvements in the detailed design of the Sydney Metro - City & Southwest Project (Sydenham to Bankstown, T3 line upgrade) to achieve this. Further reducing the scale of the new structures, for example the platform canopies, is recommended, and it is desirable that all design solutions be explored that would minimise the impact on significant fabric, setting and views within the current SHR curtilages for the listed Railway Station Groups.

If you have any questions arising from this letter, please contact Dr Siobhan Lavelle OAM, Senior Team Leader, Archaeological Heritage at the Heritage Division, Office of Environment and Heritage on telephone 02 9873 8546 or by e-mail: siobhan.lavelle@environment.nsw.gov.au.

Yours sincerely



Rochelle Johnston
Manager, Conservation
Heritage Division
Office of Environment & Heritage
As Delegate of the Heritage Council of NSW
11 October 2017