

Submission  
No 29

## INQUIRY INTO SYDENHAM-BANKSTOWN LINE CONVERSION

**Organisation:** National Trust of Australia (New South Wales)

**Date Received:** 24 September 2019

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19 September 2019

Ms Abigail Boyd MLC  
Committee Chair  
Inquiry into the Sydenham-Bankstown Line Conversion  
Parliament House  
Macquarie Street  
SYDNEY NSW 2000

Dear Ms Boyd,

### **Legislative Council Inquiry into the Sydenham-Bankstown Line Conversion**

#### **Background**

The National Trust of Australia (NSW) was formed in 1945 as a community heritage conservation organization (the first National Trust in Australia) to identify and promote the conservation of places and items of heritage significance within the State. Since 1946, the Trust has maintained and continues to update its National Trust Register for these purposes.

In an 18 August, 2017 submission on the Sydenham to Bankstown Urban Renewal Corridor Strategy to NSW Planning & Environment, the National Trust noted that the corridor crossed three former local government areas – Marrickville, Canterbury and Bankstown.

Deep community concern had been expressed to the National Trust on the impacts of proposed rezonings on heritage in some of these Station Precincts. The Trust is also aware that many residents of these areas were unaware of the likely impact of the rezonings on their heritage and their locality's sense of place and of the very limited time that was available to comment and influence that process.

With some Station Precincts there appeared to be major impacts on a number of Urban Conservation Areas which had been identified and listed on the National Trust's Register in 1998/1999.

These listings in 1998 were the consequence of a major study "*Housing in NSW - Between the Wars – A Study of Housing and Housing Estates constructed and developed in NSW between World War I and World War II*".

This study was prepared in February 1996 for the National Trust of Australia (NSW) by Robertson & Hindmarsh Pty Ltd, Architects. The study was funded in two stages under the National Estates Grants program, at that time administered in NSW by the Heritage Branch of the NSW Department of Environment & Planning.

The study examined interwar period housing in twenty Sydney local councils and two NSW country local government areas. The two Sydney local government areas with the highest number of identified precincts were Ku-ring-gai (23 precincts) and Canterbury (24 precincts).

Eighteen Urban Conservation Areas in the Canterbury Local Government Area were listed on the National Trust Register in 1998 and 1999. The three precincts identified in the 1996 Housing Study in the former Bankstown Local Government Area were also listed on the National Trust Register in 1998 and 1999.



There appeared to be major differences in the way that the Councils along the railway route recognised and protected their heritage.

The *Marrickville Local Environmental Plan 2011* had 36 Heritage Conservation Areas listed on Schedule 5 – (Environmental Heritage), of its Plan.

By contrast, the *Canterbury Local Environmental Plan 2012* Schedule 5 (Environmental Heritage) had only one Heritage Conservation Area and the *Bankstown Local Environmental Plan 2015* had no Heritage Conservation Areas listed on its Environmental Heritage Schedule.

### **The Revised Plans for the Sydney Metro City & Southwest Sydenham to Bankstown Upgrade**

In July 2018, the National Trust of Australia (NSW) welcomed the revised plans for the “Sydney Metro City & Southwest Sydenham to Bankstown Upgrade” Planning Infrastructure Report (PIR) exhibition.

The Trust was relieved that the PIR considerably reduced likely heritage impacts on the historic built fabric of affected railway stations. However, the Trust continued to object to the proposed privatisation of publicly owned rail infrastructure and the proposed rezoning of large tracts of historic suburbia along this corridor.

In 2017, an Environmental Impact Statement (EIS) regarding the proposed replacement of the publicly-owned, heavy rail line between Sydenham and Bankstown with a privately owned Metro line was exhibited for public comment. Over 500 submissions were received, most expressing objections to the plans. A revised plan was developed in response to the many issues raised during this public consultation process and was placed on exhibition as the “Preferred Infrastructure Report”(PIR).

The section of the PIR which addressed built heritage issues most directly was the “Memo . . . [on] Non-Aboriginal Heritage Assessment,” Appendix F (the Memo). The Memo was 102 pages in length and consisted of a heritage impact analysis of the PIR as it affected statutory heritage listed places between and including the ten railway stations between Bankstown and Sydenham, which are all listed on statutory heritage registers. It included consideration of five State Heritage Register listed items, 32 locally listed items and two heritage conservation areas (HCA). The information was grouped in ten sections, each focused around a railway station.

The emphasis of the Memo was on design changes made in response to public submissions which were received during the exhibition of the Environmental Impact Statement in 2017, as they affected built heritage. Each major element of each heritage place was discussed, comparing the original, Environmental Impact Statement proposal and the revised, preferred project proposal. The Memo also noted prominently in its introduction that the preferred project excluded the use of “rock-breakers” and thus effectively removed all the vibration problems for heritage places associated with them. It proposed instead to make limited use of “ballast tamper” equipment which was already in use along the line without ill effects (p2). The Memo’s conclusion summarised the likely heritage impacts of the PIR:

- Would not result in “major direct or visual impacts to any stations” although there would be “moderate direct and visual impacts to ten stations.”
- Nonetheless all stations would retain enough significance to keep their current levels of heritage listing, be it state or local.
- Many of the historic buildings would be adaptively re-used and all would contribute to the functioning of the Metro.
- New additions would be built but would be distinguishable from historic fabric.
- It is admitted that some “items or fabric [are] proposed for removal . . . More generally, the historic character of the line, a late nineteenth-century to early twentieth century railway line with layers of inter-war development, would be altered by the contemporary Metro infrastructure” (p93).
- There was a table detailing mitigation measures to help conserve heritage significance of the line and its elements (pp93-97). For example, each State Heritage Register listed station (Marrickville, Canterbury and



Belmore) would have a conservation management plan (CMP) commissioned, while the others would have a (smaller, briefer) conservation management strategy (CMS) (pp87-88).

A major problem with this Memo was that it did not address all the core heritage issues. It discussed only places which were listed on statutory heritage lists: the State Heritage Register and Local Environmental Plans, and some Section 170 listings. It did not discuss places not yet heritage listed, nor did it note or mention the existence of non-statutory lists such as our own, National Trust Register, let alone the former Register of the National Estate. It did not mention or note draft heritage listings such as the heritage conservation areas (HCAs) proposed for Hurlstone Park. A better heritage analysis would have recognised all these community-backed heritage listings and also insisted on undertaking an independent heritage assessment of the entire affected property, on the (unquestionable) assumption that these statutory heritage registers were not complete.

Furthermore, the Memo did not mention nor attempt to analyse the heritage impacts of the proposed rezoning of a large swathe of land around the rail corridor, whose sale and redevelopment is said to be essential to fund the project. This would involve demolition of a considerable quantity of historic suburban fabric and the heritage impacts were not addressed.

Another potential heritage issue not even noted is the change of use of the railway line from public to privately owned transport. Such a change of use could impact on the heritage significance of the railway line and deserves detailed analysis, but again is not mentioned.

The National Trust appreciates that the Preferred Infrastructure Report has pulled back from previous plans to demolish large sections of these heritage listed railway stations and the Preferred Infrastructure Report proposes to keep most of the heritage fabric of these historic places.

The Trust looks forward to the Committee identifying the need for Canterbury Bankstown Council to urgently consider the listing of appropriate Heritage Conservation Areas as required by Objective 13 of the Greater Sydney Region Plan 2018 *Objective 13 – Environmental heritage is identified, conserved and enhanced*.

Yours sincerely,

Graham Quint  
Director, Conservation