

## **INQUIRY INTO SYDENHAM-BANKSTOWN LINE CONVERSION**

**Organisation:** KOAS (Keep Our Area Suburban)

**Date Received:** 14 October 2019

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KOAS

12 October 2019

C/O PO Box 92  
Belmore NSW 2192

The Secretary  
Sydenham to Bankstown Line Conversion  
Inquiry  
Upper House Portfolio Committee No 6- Transport  
and Customer Service  
Parliament House  
Macquarie Street  
Sydney NSW 2000.

Dear Secretary

***Re Sydenham to Bankstown Line Conversion Inquiry***

We refer to the abovementioned.

Please find attached submissions on behalf of KOAS ( Keep Our Area Suburban) for the Inquiry.

Yours faithfully ✓

The purpose of this paper is to debunk the assertion that the conversion of the heavy rail T3 Bankstown line (with a conductor and train driver) to a Metro (SW Metro) consisting of single deck with no train driver and or conductor is an upgrade of the line with improved journey times and travel conditions for commuters. The T3 Line does not cause any bottleneck for the CBD line and no empirical evidence has been placed in the public arena to justify this assertion. The conversion of the line is merely the trigger for the overdevelopment in the Sydenham to Bankstown corridor to fit into the property and metro equation formula which is at the forefront of the MTR ( a company listed on the Hong Kong Stock Exchange and majority owned by the Communist Chinese Party) operator which is expected to run the converted line. The T3 line is undercapacity in terms of patronage and crush statistics and does not warrant the conversion of the line. The Innerwest and Western line together with the Southern T4 and Illawarra lines increased in patronage from 2014 to date on a far greater scale than the T3 line which had only very modest growth in patronage.

The announcement of the Sydenham to Bankstown Line from heavy rail to Metro was announced with much fanfare on 14 October 2015 at the same time of the Sydenham to Bankstown Urban Renewal Strategy ( *the Strategy*) on the front page of the Sydney Morning Herald. The Preferred Infrastructure Report ( for the SW Metro) for the project was released in June 2018 and was preceded by the Environmental Impact Statement for the project in 2017. The project was classified as Critical State Infrastructure status in December 2015 and approved in December 2018 by the Minister for Planning.

In essence the conversion of the T3 Line is an attempt to recreate the Hong Kong style high rise fortress towers ( with the assistance of the now abandoned Sydenham to Bankstown Urban Renewal Strategy being repackaged into Local Strategic Planning Statements by the Corridor Councils ) in sleepy low rise suburbs ranging from Marrickville, Dulwich Hill, Canterbury, Campsie, Belmore Lakemba Wiley Park and Punchbowl. The conversion of the line has no environmental, economic or social merit despite the glossy brochures and so called community engagement sessions (which have only paid lip service to the general public) undertaken by Sydney Metro over a period of 4 years.

Of further concern is the non release of the single line costing for the SW Metro in the NSW State Budgets for the past 3 years including the cost as part of the City Metro with no break down. This is creating a genuine concern that the line will be sold to a private consortium similar to Westconnex facilitated through the corporatization of Sydney Metro by the NSW Government in May/June 2018. It is the writer's opinion that the bureaucracy has undertaken a highly flawed and secretive assessment and consultation process of the Critical State Infrastructure Project – being the SW Metro. The writer believes that the statutory provisions in the making of the Critical State Infrastructure Project was highly flawed and there is no evidence that all the regulatory and statutory requirements have been met.

This has been reflected in the non release of technical reports and an apparent abuse of the GIPAA process for private citizens wishing to have information released for this project. It is also the writer's view that various lobbyists groups have dictated the direction and implementation of the Metro in the State of New South Wales favoring property developer and consultants members. Of ultimate concern is the involvement of the former disgraced dismissed Canterbury Council (subject to the Operation Dasha Inquiry) which oversaw the initial stages of the SW Metro and Strategy in 2015 and up to the dismissal of the Council in



May 2016. The involvement of the Council which has been documented has tainted the entire process and as such the process cannot be relied as being transparent and in the public interest

It is the writer's opinion that until the report for ICAC Operation Dasha has been brought down and recommendations implemented for prosecution etcetera are made, the SW Metro and controversial corridor strategy (now repackaged in the form of Local Character Area Statements by corridor Councils) should be halted and handed to an independent judicial panel for investigation. This is due to involvement of various former Council officers and Councillors of the former Canterbury Council who are the main witnesses in the Operation Dasha Inquiry.

### **Heritage Suburbs, The Strategy and Role of Canterbury Bankstown Council**

It is clear from the SW Metro analysis that the project is heavily reliant on the densification of the suburbs in the corridor to create the patronage. This is a Densification Proposal unlike anything ever seen in the history of the state of NSW or in other part of the world whereby whole suburbs have been slated for total demolition.

Many of these suburbs – particularly Lakemba Belmore Campsie and Canterbury were subdivided in the late 1800's and early 1900's and consist of low rise Californian Bungalow post war federation homes.

The Draft Strategy was originally announced on 14 October 2015 together with material which was published on the Department of Planning web page. The period of consultation was initially set for 22 November 2015 and was extended on a further two (2) occasions being 6 December 2015 and then finally until 31 January 2016.

### **The extensions were granted due to community and local council pressure.**

What is of further concern is the fact that the technical reports that the Strategy was predicated on were not released until mid December 2015 leaving the community with very little time to peruse the material.

It is worth noting that the traffic report prepared by ARUP, the economic land study by AEC, an assessment of property market by Hill PDA and the planning report by JBA Planners were suppressed by the Department of Planning.

The revised strategy was re released for public consultation commencing in early July 2017 and finishing on 3 September 2017.

We understand that further reports were prepared for the revised strategy being the following :

Heritage Review ( for some selected suburbs only), Dwelling Take Up Analysis, Social Infrastructure Study, Employment Analysis, and Fine Grain Analysis and Open Space Study reports.



JBA Planning highlighted on its webpage it's involvement with the Strategy however this report has never been made public.

We note that the Hill PDA report is dated 12 August 2015 and is in draft form. The writer is unaware of any earlier report for Hill PDA.

### **The Strategy**

The strategy proposal involved turning these quiet suburban streets consisting of mainly single storey dwellings into towering apartment blocks of more than 75 metres in height for the suburbs of Lakemba, Belmore Campsie and Canterbury.

We note that the suburb of Belmore together with Lakemba, Campsie and Canterbury had been highlighted for 6 storey plus unit development.

The suburb of Belmore is a garden suburb consisting of low rise single storey homes many of which are post war federation Californian bungalows which have been restored. Belmore is also an area whereby the first war services home was built in Australia at 32 Kennedy Ave Belmore with a foundation stone unveiled on 21 July 1919.

The following are excerpts from an article written by Lesley Muir and Brian Madden, in 2009 on the history of Belmore :-

*The area is part of the traditional land of the Bediagal people. From 1880 speculators began to buy farmland in the area south of Cooks river.*

*As the first stage of the railway to Liverpool, the line from Marrickville to Burwood Road opened on 1 February 1895. The railway station at Burwood Road was named Belmore. The railway was extended to Bankstown in 1909.*

*Early suburban houses in Belmore were built on Blossom Farm, just north-west of the railway station, subdivided as the Terminus Estate in 1895 and on estates around Canterbury Road near the St George Hotel, opened in 1893. The choice of location for schools and churches at Belmore North and Belmore South reflected this early settlement pattern.*

*The vacant paddock of St Clair Farm north of the railway was briefly used as a coursing ground after the railway was opened.*

*In the centre of Belmore, Redman's estates and Collins' Clear, immediately north east and south of the station were not subdivided until 1911; the shortage of subdivision land near the railway meant that Campsie Shopping Centre was established much earlier than Belmore...*

*Around World War 1 Federation style houses were built on the large suburban blocks at Redmans Estate for professional men and senior public servants.*

*After the war many returned service men settled in Belmore. The first home to be financed by the War Services Homes Commission was built for Private Frederick Baxter and his English wife Nellie at 32 Kennedy Avenue Belmore in 1919. Many more War Services Homes were built between 1920 and 1925 especially in the Towers Estate and at Belmore North and Belfield, where the men found work in the new railway yards at Enfield opened in 1916.*



The following are excerpts from A Pictorial History of Canterbury Bankstown by Joan Lawrence Lesley Muir, Brian Madden 1999.

*The War Services Homes Scheme was introduced as an important part of the repatriation measures. Between 1919 and 1920 the War Services Homes Commission acquired large areas of land including estates at Belmore, Belfield Lakemba and Bankstown to construct houses utilising its own staff.*

*The plans were often of distinctive design, planned by architects to create a comfortable atmosphere in which the returned serviceman could bring up his family.*

*The war service home estates represented some of the earliest and most successful urban design projects in Sydney creating neighbourhoods where each of the houses blended in to form a pleasant streetscape reminiscent of an English village.*

*Belmore retains much of its early twentieth century Federation and interwar California Bungalow housing stock and four large areas, including Redman's Estate, The Towers Estate and Belmore Shopping Centre were classified by the National Trust in 1999 as Urban Conservation Areas.*

It is these very areas that were ( and now are being proposed with the Canterbury Bankstown Draft Local Strategic Planning Statement ) proposed to be demolished and replaced with high rise development for the Metro to create the patronage.

Records from the Department of the Valuer General, NSW obtained by KOAS reveal that streets such as Cleary Avenue, Belmore Avenue, Redman Parade, Peel Street had the War Services Commission listed as the owners of the homes.

Many of these streets are within the 400 metre radius and earmarked for demolition. Many of the homes remain intact are in excellent condition and fully renovated and restored.

The homes in Acacia and Myall Streets are also in excellent condition and fully restored by their owners – the homes being excellent examples of post war Federation Californian bungalow homes.

We also note that at Burwood Road Belmore is a Department of Housing building with a plaque with the Honourable Clive Evatt KC dated 15 November 1947- Minister for Housing which was constructed to provide 32 dwellings for war services veterans. This is also earmarked for demolition being within the 400 metre radius of the railway line. This building remains intact.

There has been no analysis of the historical nature of the suburbs of Lakemba, Campsie, Canterbury but believe that the areas earmarked are worthy of retention and preservation.

We understand that Canterbury Bankstown Council has pursued the making of Hurlstone Park as a conservation area and a similar strategy should be pursued for the suburbs of Lakemba Belmore Campsie and Canterbury.

We encourage the Department of Planning to support the making of such conservation areas.



We note with interest on page 93 of “*A Plan For Growing Sydney*” dated December 2014 and endorsed by the previous Minister for Planning & Environment that :

*The Government will :-*

*.assess the heritage significance of urban renewal sites and incorporate appropriate heritage protection into the precinct’s planning controls and encourage re – use of heritage.  
.assess the potential for additional housing to be located in heritage conservation areas in Sydney, without compromising the protection of heritage significance; and  
.apply the best practice guidelines in the ICOMOS Burra Charter and the NSW Heritage Manual, which require detailed research of the history and development of an area to establish heritage significance, balanced against an assessment of where growth should go and how this should impact on heritage significant buildings.*

We would be pleased to be advised as to how the Department has complied with this Charter in the development of the Urban Renewal Strategy for Sydenham to Bankstown.

### **National Trust Conservation Areas and Department of Planning and Heritage**

The architectural firm – Robertson and Hindmarsh prepared a study in February 1996 for the National Trust examining interwar housing in 20 Sydney Local Government Areas and in 2 NSW country local Government areas.

**The funding for the study was allocated in 2 stages pursuant to the National Estates Grants Program and was administered in NSW by the Heritage branch of the NSW Department of Environment and Planning.**

The study concluded that Ku ring gai and Canterbury had the highest number of identified precincts being 23 and 24. The National Trust listed eighteen Urban Conservation Areas in the former local government area of Canterbury in 1998 and 1999.

It is now these very areas ( in the suburbs identified within the 400 and 800 metre radius in the former local government area of Canterbury) that are earmarked for massive upzoning of between 4 to 25 storeys and ultimate demolition.

The community has received mixed feedback from the Government in relation to the Strategy and it is the writer’s view that the so called abandonment by the Government of the strategy in 2018 has been replaced with an onus now being placed on the Innerwest and Canterbury Bankstown Councils to implement such a plan through its Local Strategic Planning Statement and the making of the consolidated Local Environmental Plan of which it is currently seeking Gateway Approval for. **That is, to create the patronage for the Metro as on current figures the patronage does not exist.**

**Attached and marked as Annexure A is a copy of article by Matthew Hounsell titled**

**“Which lines are priorities for Sydney Metro conversion ? Hint: It’s not Bankstown**



**Attached and marked as Annexure B** is copy of a map extract from the Hill PDA report prepared for Canterbury Bankstown Council outlining the route of the SW Metro together with the suggested unit numbers being the same as what was proposed in the original Strategy announcement in 2015 for these suburbs.

In essence the Hill PDA report prepared for Canterbury Bankstown Council endorses the shelved controversial Sydenham to Bankstown Urban Renewal Strategy to create tens of thousands of units in the suburbs of Canterbury, Campsie, Belmore, Lakemba, Wiley Park and Punchbowl.

#### **Incorrect Maps for Priority Precincts**

We note that the rezoning maps as first published for the Strategy had continuously changed over a period of 2 years. At the date of announcement the figure of 35,000 units was advocated for the corridor for both local government areas of former Marrickville, Canterbury and Bankstown Councils.

Our analysis calculated 88,000 units just for the 4 suburbs in the former Canterbury Local Government Area.

We note that the figures for unit construction differed widely with our independent analysis undertaken and the figures as provided by the Department in the exhibited documents as follows:

<b>Department Unit Figures</b>		<b>Our Analysis for Unit</b>
Canterbury	4000	18000
Campsie	6000	40,000
Belmore	3000	12,000 (excl Yellow low rise)
Lakemba	3000	18000
<b>TOTAL UNITS</b>	<b>16,000</b>	<b>88,000</b>

We note that the Canterbury Local Environmental Plan had upzoned for 44,000 units in the highly flawed and contentious Canterbury Local Environmental Plan gazetted on 1 January 2013. Added to this was the Strategy unit numbers of 88,000 which differed widely to the exhibited

**Of concern is the independent analysis of the 4 priority precincts total of 88,000 units being added to the flawed CLEP 2012 dwelling figure of 44,000 equating to 132,000 units –**

It is to be noted that the Council has also been actively supporting further rezonings for Canterbury Road for further B5 zones to allow for shop top housing with the commissioning of the Canterbury Road Review

The Strategy will equate to in excess of 264,000 persons being housed in the former Canterbury Local Government area plus over 100,000 vehicles all with no infrastructure details and planning. There are no details as to what ( if any ) improvements will be made to Canterbury Hospital as the population increases due to unit development. We envisage that the Hospital will certainly have to double in size to cater for the extra population.



There are no plans for schools, emergency services, childcare centres and libraries to cater for the extra 160,000 persons and the extra 50,000 unit

### **Launch of Directions for A Greater Sydney and the flawed business case for SW Metro**

We understand that a paper titled “ Responses to a new growth paradigm in Sydney” was presented by Patrick Fensham at an event on 22 August 2017 .

This event was under the auspices of the **Planning Institute Australia’s ( PIA) Planning Reform Series** ( of which the one of the former Deputy Secretary of Department of Planning was also the President of the Board of Directors of the Planning Institute Australia)

**Of particular interest is the use of the Sydney to Bankstown Infill example in the paper.**

**We draw your attention to pages 5 and 6 under the heading *Not business as usual...***

- **High rates of infill required ( at 75% approx.. 25,000 per year)**
- **Strategies support development near public transport**
- **We’re used to greenfield planning but we’ve done this before ( eg Syd to Bankstown reference to social infrastructure, p30**
- **The liveability of our cities is being challenged**
- **Concerns are not just NIMBYISM; communities are mobilising**

**We also point out page 9 of this rather informative paper under the heading *Mapping can assist visualisation...Access to Open Space and Recreation* where one can clearly see the low score for the Bankstown line for open space and recreation.**

Of further interest is the following ( page 7) from the paper titled “ *Ensuring a liveability dividend from growth: A new Urban Renewal Community Compact* “dated June 2017 by Patrick Fensham as follows:

*...the intention to apply a value capture funding mechanism .... has to be signalled early. If land values rise in anticipation of future additional redevelopment potential without such a signal, then it will be more difficult to fund public benefit works anticipated by and committed through any Urban Renewal Community Compact.*

*Sydney and Melbourne are growing at unprecedented rates, including significant development in established areas. ...conventional structure planning of established areas with historical subdivision patterns and existing communities, followed up by ‘catch up’ infrastructure provision, will not be sufficient to ensure that quality of life standards are maintained let alone enhanced.*

### **Community Consultation**

We express concern at the fact that the Amended Infrastructure and Submissions Report was released on 20 June 2018 and the first public consultation session had already been organised



and advertised to occur as early as Saturday 23 June 2018 from 10am to 2pm at the Bankstown Arts Centre.

What is more alarming is the exhibition time of 4 weeks to conclude on 18 July 2018 did not allowed for sufficient time to analyse and digest the 3 volume ( in hard copy format) report ( being 11 cms in thickness and weighing approximately over 7 kilograms in weight!) released and prepared by Department of Transport for New South Wales.

**This was at a cost of \$5 million plus paid to the consultant who prepared the original EIS and then the Preferred Infrastructure Report for the Government.**

The process was highly flawed ( as was the EIS process conducted in 2017) in that the key stakeholders being shopkeepers, the directly affected commuters and directly affected residents within a 300 metre radius of each of the railway stations between Sydenham to Bankstown appear to have not been liaised with at all and or have been given scant information as to the true affects of the construction effects during conversion and also the after affects of utilising a single deck metro train with 35% seating capacity and 65% standing room and the loss of their direct route to the city circle link.

This is in addition to the loss of direct links to St Peters, Erskineville and most importantly Redfern particularly for the Sydney University students from the corridor.

Furthermore it is the writer's opinion that it appears that many of the issues raised by interested parties who made submissions to the EIS have remained unanswered and or have been given scant/dismissive and or little explanation in the documents placed now before the public for perusal.

The changes that have been to the current preferred project have been sarcastically dubbed the *Metro Light* however the overall effects of the project remain of serious concern.

We outline our specific concerns as follows:

**New Preferred Project Requiring New EIS Process, Consultation and Revised Business Case.**

We are of the view that this is a totally new project and as such required a new exhibition process to be undertaken and not be subjected to the current process of exhibition.

We are also concerned that the Business Case which for the most part has never been released in full (due to major redactions) cannot be applicable to what appears to be a scaled down version of the Metro to the Metro Light. We would request details as to what information (if any) has been provided to NSW Treasury in relation to this scaled down project and what impacts has this had on the original Business Case as was used to justify the level of taxpayer funds to be expended.



Even though the Department of Transport appears to have repackaged the Metro into the *Metro Light* for political and community acceptance by the non demolition of heritage platforms, reduced removal of valuable vegetation, retaining existing entries to most railway stations and what is an apparent artificial and misleading reduction in the shutdown period for conversion, the effects on the travelling commuter and the residents and shopkeepers nearby remain very real and problematic.

We bring to your attention that 21 million users tap on and off the T3 line between Sydenham to Bankstown each year together with 100,000 commuters in peak hour each day. The economic and social upheaval and cost to the local community of converting the line and in the process suspending the line for any period of time during week days has been completely underemphasised and underestimated in terms of dollar value by the Government. The writer believes that the cost is in the range of \$500 million due to the dislocation of the services and construction interference with local businesses along the route.

Attached and marked as Annexure C is correspondence dated 15 August 2018 signed by Mr Tim Parker – Project Director – City and Southwest Sydney Metro confirming the commuter patronage for the line.

Of further concern is the fact that the government is ignoring the signalling upgrade for the T3 Line as a method of improving services and capacity in favour of ripping the line up to convert it to Metro ( at a cost of \$1billion to convert the line) .

Attached and marked as Annexure D is copy of article titled "*Quickest and cheapest way to boost Sydney's train services*" dated 13 March 2019

### Lack of Proper Consultation with Key Stakeholders

The corridor the subject of the EIS and Metro proposal has been described by NSW Department of Planning as part of their documentation on the Sydenham to Bankstown Urban Renewal Strategy as follows:

*"The corridor is highly urbanised and extends through one of Sydney's most densely populated and ethnically diverse regions"*

It is due to the above description that extra care should have been taken by the NSW Department of Transport in explaining to the residents, the shopkeepers and the commuters the real impacts of the project rather than provide them with glossy brochures full of spin and promotion.

What is of particular concern is the reference to the small business package in the EIS which appears to have had no consultation with the shopkeepers and or landowners who will be directly impacted by the effects of construction of the conversion of the T3 line from heavy rail to Metro. The NSW Department of Transport has failed to adequately compensate and



inform shopkeepers and landowners of the effects of the Light Rail. It seems that history appears to be about to be repeated with this project.

### **Non Publication of Bankstown Station in Preferred Infrastructure Report Overview June 2018 and Interchange effects-“ Impractical and Unsafe”**

We raise concerns due to the fact that the Bankstown Station has been omitted from this report. Furthermore what is disturbing is that there appears to be no analysis or comment about the fact that the Bankstown Station will be totally dislocated and unsafe with the current proposal to build a Metro Station ( in addition to the existing heavy rail station) to the East which will lead to a walkway of at least **400 metres in length** . There has been no analysis of the fact that 19,000 commuters will use Bankstown as an interchange (changing from the Western section from the stations of Carramar, Villawood, Chester Hill Yagoona, Berala, Birrong, Yagoona ) to Bankstown.

The former administrator for the Canterbury Bankstown Council summed up the concerns in the SMH on 29 May 2017 as follows:

*The plans are impractical and unsafe. There is no integration with the town centre or an attempt to make the station a visual feature of our city.*

Further on in the article the following is stated:

Mr Colley said the plans instead featured a “*convoluted ramp system*” with only two access points and a new metro entrance tacked onto the existing station which would create a long walk for commuters and act as a barrier between the north and south ends of Bankstown Centre.

The published analysis of commuter time savings( due to Metro change) will be totally debunked if the real analysis of loss of time for commuters due to the impractical and unsafe convoluted ramp system was made of the proposed **Bankstown twin stations interchange**.

### **Gridlocked and Unworkable – Dire warning from former top executives of NSW Transport.**

Former rail executives Messers Brew, Christie, O’Loughlin, and Day in a critical assessment of the Metro Project( **dated 3 July 2015 and 3 months prior to the announcement to convert the Sydenham to Bankstown line from heavy rail to Metro**) made damning comments which appear to be completely lost on senior personnel in charge of the South West Metro.

These former rail heavyweights warned that the Sydney Metro Plan ( including the removal of the Bankstown T3 line) will result in “*degradation of the robustness and reliability*” of



Sydney's existing heavy rail network and *ultimately lead to the total network becoming gridlocked and unworkable*"

The submission also makes the following comments:

*Metro trains are best suited to highly populated, densely trafficked commuter areas over short journey times and NOT long, park and ride journeys..*

*Removal of the heavy rail on the Bankstown line will cause:*

*Major disruption to the efficient operation of the network resulting in*

*Reduction in network flexibility and reliability*

*19,000 commuters will have to change trains for the first time since the network was built.*

*Resulting in longer journey times for commuters from the Southern stations between*

*Liverpool/Lidcombe turn back and in between stations from Carramar, Villawood,*

*Leightonfield, Chesterhill, Sefton(11,000) and Berala, Birrong, Yagoona( 8000) to*

*Bankstown*

*Following the takeover of the Bankstown line by the Metro train the relief valve for the network is gone and will result in the network having no escape route.*

It is of concern that none of the above appears to have been referred to in any of the material produced in relation to the South West Metro EIS consultation process.

The fact that 19,000 commuters have been left out of the time savings analysis for conversion of the line is very concerning.

As a community group we would welcome the Minister for Transport's response to the submission made by Messers Brew, Christie, O'Loughlin, and Day (dated 3 July 2015) as a matter of urgency in order to restore public confidence in this process.

### **Heritage Analysis and effects on heritage buildings and places**

We note that the kiss and ride kerbside facilities are proposed to the Tobruk Avenue Belmore corner despite our submission of 1 December 2017 stating that a sign exists at this corner explaining in great detail the significance of the approach walkway from Belmore to Campsie being in dedication to the heroic efforts of the Australian troops in defending the town of Tobruk Libya during 1941.

This is a place of historical significance and we respectfully suggest that this proposal be removed and relocated elsewhere and that the NSW Department of Transport respect the military history of our suburb.

We are concerned that there is now a proposal to re level the platforms of the stations. What is of concern to what is now being dubbed "*burying the platforms of our heritage train stations like Pompei*" is that there appears to be no peer review of the architects that have



been engaged by the Sydney Metro to undergo this work. The same architects have been retained to do the revised project work for the South West Metro.

The preferred project heritage report fails to take into account the existence of non statutory lists such as the National Trust Register or the former register for the National Estate. It fails to mention or take note of the draft heritage listings such as the heritage conservation proposed for Hurlstone Park.

### **Station Train Closures, Traffic Analysis, and Temporary Transport Plan.**

We note with concern that the revised Preferred Project now proposes to **close up to 3 stations for up to 2 months** for station construction. Any relief given in reducing the number of weeks originally proposed for possession during the school holidays (from 2 weeks July and 6 weeks during Christmas holidays) have been dissipated now due to the additional 8 weekend possession periods added plus night time week day possessions together with the proposed closure of up to 3 stations for up to 2 months. No information exists if this closure of the stations is to occur on a yearly event or one off.

This is a worse situation for the commuters and nearby residents alike from the original EIS as exhibited.

We note that the Traffic Transport and Access Assessment prepared for the revised project is highly flawed. Page 6 of Appendix D states the following:

*"To determine a suitable factor the traffic volumes in the project area were determined"*

However of the 6 locations chosen to determine traffic trends **none** were not in the metro project area. It is stated that they were chosen on the basis of proximity to the project area. The suburbs are not listed however they are the following: Wolli Creek, Clempton Park, Roselands, Lakemba, Narwee and Bankstown. The suburbs of Sydenham, Marrickville, Dulwich Hill and Hurlstone Park are not close to these chosen locations.

We also note that the Temporary Transport Plan (TTP) has now been amended to take passengers by bus to the T2 Innerwest and Leppington Line together with the original EIS proposal of taking passengers to the T8 Airport and South Lines. The traffic assessment does not appear to analyse the TTP or the amended TTP despite this being a major change.

No information exists as to what the views of the Georges River Council, the Innerwest Councils and the local Members of Parliament for Oatley and East Hills in relation to the burden of the temporary transport plan on their constituents and the amenity of their area. **It is critical to obtain proper traffic analysis due to the fact that up to 100,000 commuters from the Bankstown Line will be placed on buses each day during the conversion process.** This is 5 times the number of commuters that were affected by the shutdown of the Chatswood to Epping line on 30 September this year ( noting that the Chatswood to Epping line was fairly new compared to the 122 year plus T3 line)



### **Footprint of Metro**

The footprint of the South West Metro remains unchanged which leaves an inference to be made that the original project as exhibited with the EIS in 2017 may be renewed at some time in the future.

### **Council and other property concerns**

Concern still exists that no details have been given as to which land and commuter carparking areas belonging to or being managed by Councils will be utilised as part of the project. Concern that valuable open space parkland (belonging to the former Canterbury Council and now Canterbury Bankstown Council) continues to be included as part of the footprint for the project area such as Warren Reserve in Punchbowl.

### **Over Station Development**

We reiterate our concerns in relation to over station development and we point out to the Fine Grain Analysis' for Lakemba, Belmore and Campsie produced by the Office of the NSW Government Architect in documents released in 2017. These documents clearly show an intent to develop highrise towers within the corridor. For example in the Lakemba Fine Grain analysis document drawings detail a tower on the northern verge (within the corridor) labelled TFNSW development land on page 35 and the following is stated on page 25:

*A significant development opportunity is located eastern side of Haldon Street, utilising the land either side of the rail line and the air space over the rail line. It is recommended that this could accommodate a significant tower structure becoming a marker building within the context akin to the Forum development at St Leonards*

We note the following from the Submissions Report page 5.26

**Transport for NSW is not proposing to deliver any residential developments or overstation development as part of this project. Any future development would be subject to a separate assessment and planning approval process.**

We note that Sydney Metro was privatised in May this year in the NSW Parliament via the *Transport Administration Amendment Bill (SYDNEY METRO) BILL 2018* giving it unprecedented development powers in relation to acquisition of and development of residential, shopping centres within the Metro Corridor.

It remains of tremendous concern that Sydney Metro may be sold to a company such as MTR Corporation which is 79% owned by the Hong Kong Government (AKA Chinese Government) who in turn will develop within the corridor and not be subject to public or parliamentary scrutiny.



MTR we understand will run the SW Metro and concern continues as to why it is that a public heavy rail line is to be converted to a Metro and effectively privatised with little or public discussion in relation to this aspect.

We further note the comments made by former Mayor of North Sydney Council, Genia McCafferey on 12 July 2018 in the SMH article in relation to Council's opposition to the proposed 42 storey tower on top of the Victoria Crossing Metro station at North Sydney :

*The job of Sydney Metro is to build a metro, not to be a private developer*

We also refer to recent comments by the former head of the Hong Kong Housing – Mr Anthony Cheung appealing to the Hong Kong government not to give exclusive property rights to MTR corporation at the new Metro stations.

There is no information or assurance as to exactly what will be MTR Corporation's role in the SW Metro corridor if and when it begins the operation of SW Metro.

We note that the Premier met with MTR Corporation LTD representatives on 13 March 2017 “to discuss MTR business activities in NSW.” We would be pleased to be advised as to the exact nature of these business activities that were discussed and whether overstation development and or the involvement of MTR Corporation was an option.

### **Conclusion**

In conclusion we feel that the revised project has not addressed the primary concerns in relation to the privatisation of a perfectly functioning heavy rail line that has been in existence for more than 122 years. We feel that the environmental and social impacts of such a conversion do not warrant the Parliament supporting this project. It is simply a catalyst for high rise development along the corridor and appears to be based on the Hong Kong model of the Metro – high frequency in high densely populated areas built around towers to feed the patronage thirst of the Metro operator. MTR Corporation we feel may become the property arm of the NSW Government in developing and selling development in the Sydenham to Bankstown Corridor. It appears that the expert warnings of the former chiefs of the NSW Transport in a submission dated 3 July 2015 have not been addressed and more importantly heeded. The public are entitled to a full explanation as to why this project was announced with much fanfare in October 2015 when the submission of Messers Brew, Christie, O'Loughlin, and Day dated 3 July 2015 would have been in circulation within the NSW Department of Transport. This submission and their concerns as outlined above have not been addressed at all and this in itself leads to a total lack of public confidence in the project. We urge the Upper House Committer for Transport and Customer Service to not support this project as it is against the public interest.