

**INQUIRY INTO SYDENHAM-BANKSTOWN LINE  
CONVERSION**

**Name:** Name suppressed

**Date Received:** 13 October 2019

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Partially  
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Portfolio Committee No.6 Transport and Customer Service  
Sydenham-Bankstown Line Conversion Inquiry  
Parliament House  
Maquarie Street  
Sydney, NSW 2000

Dear Portfolio Committee No.6 – Transport and Customer Service

I wish to oppose the construction of the Sydenham to Bankstown Metro and conversion of T3 heavy duty, well functioning rail line to a driverless South West Metro. I request that your committee investigate it carefully as it appears that the conversion does not provide good value for scarce public resources and as according to experts it will not reduce congestion of the rail network or improve capacity of the Sydney Rail Network as claimed but it will reduce flexibility and reliability of the wider Sydney network.

Residents along the line do not think that the pain of the project is worth the gain to the community. Of the 549 submissions to the 2017 EIS only 17 – 3% were supportive of the project. (P6, Part B Submissions Report 2018)

My opposition is based on the following concerns

**A) The adequacy of the business case and viability of the Metro**

- The summary of the business case released in 2016 is a seriously flawed document and should be the subject of a detailed investigation by your inquiry.
- The full business case has not been released and the redacted numbers make it difficult to determine how benefits have been calculated.
- The business case appears to have grossly over-inflated benefits and under-estimated costs. E.g., prediction that 100% of Operation Costs will be covered by fare revenue when this doesn't happen in North America or UK, currently 27% in Sydney., making business assumption unrealistic.
- The Productivity Commission 2017 Five Yearly Review identified that major infrastructure projects have an average 26% cost blow out. If a likely cost of \$15b (Conservative) is used for the Metro then the cost benefit ratio becomes negative.
- Business case claims \$1,863m in benefits to time travel savings, however this is incorrect as loss of direct access to city circle destinations will involve several time consuming interchanges
- Impacts of rail line shutdown, disruption for commuters calculated to be just \$14m or 36cents per trip! If delays of 30 minutes, costed at half an hourly rate of \$38.30, then more realistic impact figure is \$735m. If 15 minutes cost of disruption \$367million.

**B) The consideration of alternatives for improving capacity and reducing congestion**

- The concept of removing the Bankstown line to build rapid transport metro was first floated in paper "Sydney's Rail Future" released by the Transport minister Gladys Berejiklian in 2012
- No justification for why the Bankstown line chosen and State Infrastructure Strategy 2012 questioned decision because "The Bankstown Line only carried 6,600 passengers in the peak hour, whilst the heaviest traffic flows occur between Strathfield and Central."
- 2015 Former Rail executive write letter saying that money would be better spent upgrading double deck system by improving the signaling, & providing track amplification at critical pinch points. They warned it would not improve capacity or relieve congestion.
- They warned that the "takeover" of the existing Bankstown line will remove the relief valve for the network and leave "no escape route" for South, Western and SouthWestern lines at times of major disruption." and this would reduce the flexibility and reliability of the City network.
- SMH March 13 Howard Collins (Sydney Trains Chief) stated that Sydney's stretched rail network could carry up to 40% more passengers if the signaling system was modernized to allow more services –trains turning up every 2 ½ minutes
- At a cost of \$3b digital upgrade of the signaling system enables trains to travel closer together and would provide much better value for money and better service across the Sydney network .Please

investigate why isn't this option being considered as it would provide much better value for scarce state funds and better outcomes for all Sydney commuters.

**C) The factors taken into account when comparing the alternatives and the robustness of the evidence used in decision making.**

- The Sydenham to Bankstown Alliance has always said that the answer lies in building new railway lines to suburbs that don't currently have them, rather than converting existing lines to suburbs that already have them.
- T3 line has one of lowest overcrowding rates (7<sup>th</sup> out of 11 lines) so there is no need for a rapid transit Metro
- The Northern, Inner West and Western and Illawarra lines have far worse overcrowding and there is a "strong market" for rapid transport through the Inner West.
- During 2019 election campaign both major parties supported the Sydney Metro West and made it top priority.
- Concern that greater density needed to make The Metro viable. Sydenham/Bankstown Urban Renewal Strategy was closely linked to conversion and the connection between up-zoning development potential along the rail corridors is the modus operandi of Hong Kong based MTR Corporation, the company with operating rights for The Northwest Metro.
- In August 2019 plans for the second stage of The Paramatta Light Rail were put "on the back burner" due to shortage of funds.
- The City Metro could stop at Sydenham and it would be perfectly legitimate for the government's priorities to change regarding the Sydenham to Bankstown line.
- If the major requirement for improving Sydney's rail network is to provide greater service to Parramatta, via the inner West then the best way to do it is to build the line there.

**D) Whether the Metro is a suitable means of transport over long distances**

- Simple answer is No when considering long distances to be travelled whilst standing.
- "Metro trains are best suited to highly populated, densely trafficked areas over short journey times, NOT to long park and ride journeys" Former Rail Executives July 2015)
- Existing double-decker eight car Waratah trains have 896 seats and the Metro single storeyed train will have 378 seats (60% reduction)
- Currently 70% of commuters are seated with 30% standing however this will be reversed.
- Government's own business case acknowledges "Customers travelling on Metro services are expected to experience some crowding dis-benefit as trains will be configured to accommodate a higher ratio of standing to seated passengers"

**E) The Consultation process undertaken with and the adequacy of information given to community, experts and other stakeholders**

- Consultation process undertaken for the 2017 original EIS for the Southwest Metro Project and for the Preferred Infrastructure Project PIP) (2018) were flawed and lacking in adequate time for proper community consultation.
- Documents weighed in excess of 25kgm in hard copy format. PIP in 3 volumes, 11cms thick & weighing 7kgms with an exhibition time of only one month.
- Little or No consultation with key stakeholders, business operators, directly affected residents, commuters, schools, community groups or councils along the line.
- Community information sessions such as those in Town Halls, community festivals and the Royal Easter Show are not consultation & measuring success by numbers of encounters flawed.
- These sessions provided glossy marketing rather than substance and have been inadequate.
- Visitors to these sessions were presented with pre-defined options and there is no sharing of ideas. Questions and concerns have been dismissed and consequently community sessions poorly attended

- It appears that many issues raised by interested parties who made submissions to EOS (2015) and Preferred Infrastructure Report (2018) have remained unanswered or been given scant/dismissive or little explanation post exhibition.
- There needed to be much more consultation with State planning, local councils, experienced transport experts and communities.

**F) The impact on the environment and heritage conservation.**

- The biodiversity assessment of the Metro Southwest corridor appears to be inconsistent and contains gaps and lacks the granularity necessary to capture the type and quality of native vegetation.
- Potential 13.8 hectares of vegetation, including mature trees will be removed along the banks and rail lines to be replaced by security fence up to 2.4 metres in height for the full length of the line. Loss of biodiversity will result.
- This includes reduced number of trees (exact number not known) from 893 to 503 trees (native & exotic) that will create a great loss of urban canopy & impact on wildlife sustainability.
- It is unfortunate that replacement trees will be planted outside the corridor and opportunity lost to establish a biodiversity corridor.
- Project needs to appropriately manage impacts of Climate Change and severe weather events on construction and project infrastructure functioning.
- Climate variables identified in EIS included annual rainfall, extreme rainfall, extreme temperature, extreme wind, storms (cyclones, hail, dust and lightning) sea level rise and fire danger. All of the above have the potential to impact in the form of increased costs and need greater investigation and inclusion in costs for construction and running.
- All flooding strategies in EIS were removed in Preferred Infrastructure Plan despite warnings from Marrickville Council and Sydney Water that Project needed to address in detail the existing flood risk and anticipated flood management system requirements.
- Preferred Plan response was that the Preferred Project would be operated within the current hydrological environment and that no further modeling or assessment is proposed as part of the detailed design.
- Can the committee investigate why this irresponsible decision was made considering the potential impacts it may have on social & economic costs to the community as a consequence of flooding along the line particularly at Canterbury, Dulwich Hill, Marrickville and Sydenham.
- Operation and maintenance would result in increased emissions of Co2 as a result of increased use and sustainable initiatives must be reviewed & updated & relevant initiatives implemented including the use of renewable energy to minimise greenhouse gas emissions.
- The EIS claim that the “Project has the potential to reduce greenhouse emissions by providing a comfortable & efficient alternative to private car travel”, however this cannot be assumed as a definite outcome considering factors such as fare increases, discomfort of standing long distances in very close proximity to other commuters may encourage greater car use.
- Any further development in the Cooks River valley will make an already polluted Cook’s River much worse than it already is.
- Although Heritage impacts were revised and somewhat reduced impacts of Metro construction on Heritage will be significant in a historic rail corridor that is rich with built and cultural heritage.
- The original project as described in the EIS 2017 failed to apply best practice to heritage assessments in the corridor or planned treatment of railway heritage in the project area. Minimal Heritage studies were undertaken and conclusions were not consistent with community expectations and values.
- Preferred Project lacked detail about what heritage elements would be retained and how they would be treated, It states “Items of fabric (are) proposed for removal” and that “the historical character of the line would be altered by the contemporary Metro infrastructure, especially the glass door barriers”
- Metro Project was aligned with the unpopular “Urban Renewal Strategy” which involved drawing 800 metre circles around the stations to rezone land for medium and high density development. This meant mass destruction of built heritage and the historical character of suburbs along the line.

- Planning has been given back to local councils however the corridor is still identified in the Eastern District Plan for “transit orientated development”.
- The Northwest and City Metro projects have sought to value capture with tall towers at Metro Stations e.g. planned 1900 units at Castle Hill Showground, 11,000 at Tallarong, 42 storeyed tower at Victoria Cross, 29 & 39 storeyed towers at Martin Place and controversial yet to be determined heights at Waterloo.
- While ever the Metro strategy exists there will be speculative development pressure on the corridor and such development is highly unsuited to the established, character filled railway precincts along the corridor
- The Metro Project is inherently flawed, has been incorrectly attributed to a heritage/character rich already dense corridor, that has a well functioning historic heavy rail line: it lacks the social license to proceed and is not in the public interest.

**G) Any lobbying, political donations or other influence of the public or private sector in relation to making that decision**

- It appears that lobby groups such as Committee for Sydney, Urban Taskforce, Property Council of NSW and Planning Institute of Australia all actively lobbied for the Southwest Metro as a means to act as a catalyst for development within 800 metres of each Railway Station in the corridor.
- From perusal of submissions made to the Department of Planning and NSW Transport from 2015 that these various organisations extolled the virtues of a Metro linked to high rise development and “urban renewal” which involves “clear felling” of historic houses and streetscapes that would not be tolerated in other Sydney suburbs.
- From submissions made for the Metro Project in 2017 the premise for support for the Metro clearly falls within the property development opportunities and recreating the business model of MTR Hong Kong where towers are built around Metro Stations (Mascot Towers come to mind) creating the patronage for a successful business model and making the Metro viable.
- Lobbying and Political donations need further investigation by your committee.

**H) The tender process for appointing private operations.**

- There is little information available to the general public and this process needs rigorous committee investigation.

**I) The contractual arrangements entered into in respect of the project**

- The Northwest Metro was awarded as a single package for construction and design whereas the Southwest Metro is being awarded in multiple contracts over a period of time. Why?
- Funding arrangements are clouded in secrecy and contractual arrangements for each of the tenders awarded confidential.
- The tender dollar amount for some of the contracts awarded for Southwest Metro have also been withheld. Attempts to gain information through GIPA have been deemed “invalid”.
- Why the government will not release the actual cost remains a serious concern in terms of public accountability and transparency and requires rigorous investigation by your committee.

**J) The adequacy of temporary transport arrangements during the conversion process, including for people with a disability**

- There are significant concerns over the way that the Government has handled the release of information about how commuters will be serviced during rail shutdowns required for the conversion of the line.
- Plans were promised for “several years beforehand” however despite several GIPA attempts a Temporary Transport Plan (TPP) was only released on September 6, 2019.
- This only covers the T3 & T4 lines in late 2019 and early 2020, not the entire construction period. Transport has deemed entire document to be “Cabinet in Confidence” to prevent access to the full document. This needs further investigated by your committee
- No public consultation has taken place & no communication with local councils and that is unacceptable

- Problem areas include: loss of direct services between Liverpool and Bankstown: the lack of replacement bus service at Bankstown station: why is T4 Illawarra line also being closed down and what will happen to Country trains to Southern NSW, Canberra & Melbourne: lack of information regarding stations between Birrong and Liverpool on T3 line; problem that replacement buses do not stop at Redfern; concern that New year's Eve & Boxing Day Sales demand will create long delays; increased traffic congestion on already busy roads; increased travel times: concerns regarding overcrowding , especially on stops from Campsie to Sydenham but most seriously the fact that not all buses will be accessible as the brand new "StationLink" buses were for the Northwest Shutdown.
- Problem of inaccessible buses will make travel very difficult or impossible for wheelchair commuters and parents with prams.

#### **K) The impact on the stations west of Bankstown**

- Express train to City will be removed from timetable. Increasing journey times.
- 19,000 + current commuters will lose direct access to the city circle trains by removing the direct train line to the city from 9 stations including Berala, Regents Park, Sefton, Chester Hill, Leightonfield, Villawood, Carramar, Birrong and Yagoona.
- Travel times will be increased for these commuters as trains will need to be changed at Bankstown, Sydenham and or Central if city circle stations needed. Walking 800 metres from Martin Place to Circular Quay may be a difficult option.
- Current design of Bankstown Station as an interchange will have commuters walking 450 metres between stations making it harder for the elderly, parents with young children and less mobile and adding to journey times.
- Services on the Illawarra line will be required to stop at St Peters and Erskineville, resulting in increased journey times and reduced capacity of the Illawarra line.
- Students travelling to Redfern will lose access to station and will need to change at Sydenham. Standing on trains will limit ability to read or use computers.

#### **L)Any other matters**

- Customer service concerns
- Upgrade of stations with lifts for accessibility could be done without the expense of Metro upgrade.
- Reduced capacity from 896 seats to 378 with 70% of passengers standing
- Claim that Metro is "customer focused" is not accepted considering disregard for aging population, extended families travelling with young children and passengers forced to stand over long distances- possibly 66kms.
- Capacity levels quoted would be extremely uncomfortable based on "crush capacity" in Tokyo with pushers to get people onto trains.
- Claim that Metro will provide better access to Education facilities is not correct as there will be no stop at Redfern and younger children travelling to school will be faced with several interchanges.
- Travel time reductions are not believable, due to interchanges.
- Security and Safety Concerns over lack of driver or guard on long distances underground to assist with incidents, breakdowns, assisting passengers off carriages in case of fire.
- Carriages describes as "death traps" as limited egress in tunnels and all passengers would need to leave by from to rear of train where 100 kph train would be approaching within minutes
- Problems for Senior groups, Extended families and school groups boarding and alighting together in 20 second dwell times.
- Safety and concern of increased platform incidents with use of mechanical platforms along the line as all 11 stations are curved.
- Would ask that the committee recommend that the T3 Sydenham to Bankstown Metro not proceed due to multiple negative impacts, including waste of scarce public funds, lack of

transparency and poor governance, poor consultation with stakeholders, focus on development rather than improving public transport, unsuitability of Metro for long commuting journeys, loss of flexibility & reliability of Sydney network, loss of heritage, character and five year disruption impacts on communities along the corridor.