

Save Dully submission to the Sydenham to Bankstown Metro environmental impact statement

November 2017



About us

The Save Dully Action Group was formed in mid-2015 in response to the Sydenham to Bankstown corridor urban renewal investigation. We have in the order of 300 members across the suburb of Dulwich Hill. Our website is www.savedully.com

Introduction

Save Dully objects to the proposal to upgrade the Bankstown Line from Sydenham to Bankstown to Metro standards because the project is unnecessary and will have incredibly destructive impacts on Dulwich Hill during the long five-year construction phase, and also in its operational phase. These include noise, vibration, heritage, traffic and parking impacts.

The improvements brought as a result of the Metro line – such as increased service regularity, disabled access to Dulwich Hill station and an improved interchange with the light rail line – can be delivered by upgrades to the existing Sydney Trains network.

In addition, once operational, our community will suffer reduced transport services because we will no longer have access to the City Circle and will also lose direct access to stations west of Bankstown, along with losing access to trains with extensive seating.

The only real benefit of the Metro line is a benefit to every other part of Sydney by removing the Bankstown line from the City Circle, and therefore improving capacity in the City Circle. But that doesn't mean the Metro line is a good thing for Dulwich Hill or Bankstown line commuters.

In addition, a major concern to us is the fact the Metro is being used as an excuse by the NSW Government to force brutal and unwanted overdevelopment on our historic suburb.

Alarming, this development is proposed to happen at the worst possible time – when our railway line is to be shutdown and rebuilt – without any consideration of the cumulative impacts of private and public construction occurring simultaneously.

When it comes to the Metro, simply put, the extensive pain is not worth the limited gain. This application should not be approved.

Our recommendations

We oppose the Metro and asked that it is refused. If it does happen to be approved, we ask that the following recommendations be implemented:

General construction management

- A detailed assessment of the cumulative impacts of private construction due to the Sydenham to Bankstown Urban Renewal Strategy and public infrastructure construction for the Metro rail line be undertaken and exhibited, before any approval is given for the Metro line, given that this assessment is not included in the EIS
- A corridor-specific Construction Noise and Vibration Strategy is prepared is exhibited before any approval is given for this project.

Noise relief

- No works are undertaken after 10pm or before 7am or after hours on weekends, given the extended and ongoing nature of these works over a five-year period
- Any future Out of Hours Strategy be exhibited for public comment, before any approval is given for the project, because of the sensitive and high-impact nature of Out of Hours works.
- Noise attenuation works (such as the works which was offered to homes under the flight path) are offered free of charge to properties set to suffer severe noise exceedances during construction
- Alternative accommodation in Dulwich Hill or adjoining suburbs is provided to any resident who requests it, or alternatively the criteria for alternative accommodation is dramatically reduced from the currently proposed 30 decibels above the relevant noise criteria

Vibration management

- The proponent be required to undertake pre-construction dilapidation surveys of all properties potentially affected by vibration, to allow a full understanding of the state of the properties before works begin. If the works are affected by vibration, we also ask that the proponent be required to provide compensation to affected homeowners.

Rail shutdown traffic and commuting impacts

- Before approval, the Temporary Transport Strategy be re-exhibited to provide information about the likely commuting delays to be caused by the proposed extended shutdowns of the Bankstown Line from 2019 to 2024.
- Any approval requires individual Temporary Transport Plans to be exhibited for public comment and separately approved, given the significant potential impacts of these plans on local residents and commuters

Parking management

- Inner West Council is provided funds to hire additional rangers to monitor illegal construction worker parking, or parking which impacts existing residents, and to set up residential parking schemes

Albermarle St Bridge analysis

- An adequate analysis is undertaken of the impacts of the proposed closure of the Albermarle St Bridge, given that the EIS has no such analysis

Station design

- Metro stations are designed so they do not need to refer to a centralised urban design guideline and instead each station is designed to reflect local character and community views.
- Separate development applications are required to be lodged for station designs, before any construction is undertaken, to allow a fuller appreciation of what is being proposed.

Impact analysis

Summary of impacts

The five-year construction process, from 2019 to 2024, will be enormously disruptive to the residents of Dulwich Hill.

This is largely because of the extraordinary complications of trying to build a new railway line in place of an existing operational line. This will require intensive and noisy works to take place at night and weekends (in other words the most sensitive time for the community) during unwanted and highly inconvenient line shutdown periods.

We will suffer from delays getting to our workplaces and other destinations when we are forced to catch buses during these shutdown periods.

Given the construction period is so long, we believe that existing NSW Government noise guidelines¹ which assume that construction impacts are relatively short-term should not be relied upon. Instead, if the government is determined to press ahead with the project, a new approach should be undertaken which involves far more robust solutions to protect the amenity of nearby residents.

It is arguable such a project (building a new railway line in place of an existing railway line) has never before been attempted in the history of NSW – and for good reason. It simply doesn't make sense to rip up our existing railway line to build a new one.

We are particularly disappointed by your Construction Noise and Vibration Strategy, which appears to be the same document used for the North-West and City & South-West elements of this project, despite the Sydenham to Bankstown leg of the project being significantly different to these other project elements.

For instance, the Strategy makes reference to tunnelling, which is not required between Sydenham to Bankstown.

Given that the Sydenham to Bankstown part of the project is the only part of the project which involves the replacement of an at-grade rail line, and the resultant additional impacts this brings on nearby properties, we would have expected a corridor-specific strategy. We therefore ask that such a strategy is exhibited before any approval is given.

We would now like to more closely analyse the project's impacts and the inadequate response in the EIS to these impacts.

Night-time noise

Dulwich Hill will be suburb worst affected by construction noise along the Sydenham to Bankstown Corridor. This is because of the high number of residential receivers living alongside the railway line and the fact you will need to compress highly intensive 24/7 works into a short space of time during rail shutdown periods.

We are particularly concerned by the sleep disturbance impacts of your project.

According to your EIS, a total of 1,221 Dulwich Hill properties will be exposed to noise at a level which breaches the potential for sleep disturbance criteria (background noise level plus 15 decibels from 10pm to 7am) during the construction period from 2019 to 2024.

¹ Such as the Interim Construction Noise Guidelines

This includes 783 properties which would experience noise from earthworks which exceeds the criteria for 30 weeks during the construction period.

Your Construction Noise and Vibration Strategy provides only limited mitigation measures for this very concerning and widespread impact.

For instance, it states that alternative accommodation will only be provided when noise impacts are 30 decibels above the relevant background noise level. However, your criteria for potential sleep disturbance impacts is 15 decibels above the background noise level.

It is not explained in the EIS why alternative accommodation will only be offered for residents with a 30 decibel exceedance. There is no reference in the EIS to the relevant NSW Government guideline on which this number is based.

We also note conflicting claims in your material as to whether noisy machinery will be used at night. The Metro EIS summary brochure handed out to the community says “use of highly noise-intensive equipment for rock breaking and ballast tamping will be limited to between 7:00am and 10:00pm to minimise these impacts.”

Chapter 12 of the EIS tells a different story. It says:

“Activities involving the use of hydraulic breakers and ballast tampers would not be scheduled during the night-time period (10pm to 7am), unless constraints exist such as **works requiring a rail shut down or due to the requirements of road authorities, emergency services or Sydney Coordination Office.**”

In other words, we are going to face the use of heavy machinery during our sleep time during shutdown periods, which will span up to 46 weeks from 2019 to 2024.

Given the lack of mitigation measures for sleep disturbance, we argue that no works should be undertaken from 10pm to 7am – whether with noisy machinery or otherwise.

We are also concerned by the fact that the EIS does not include an adequate Out of Hours Strategy and Plan, as is required by the Secretary’s Environmental Assessment Requirements. These requirements state: “The EIS must include a framework for both an Out of Hours Works Strategy and the development of an Out of Hours Works Plan which incorporates community consultation.”

However, no such Out of Hours Strategy or Plan is included in the EIS. In fact, a separate section of the EIS² states: “An Out Of Hours Work Strategy would be developed to guide the assessment, management, and approval of works outside the recommended standard hours. The strategy would be developed to ensure that out of hours works are managed effectively during construction, and to avoid incidents and impacts to the community as a result of out of hours works. The strategy would be prepared in consultation with key stakeholders (including the EPA).”

Any Out of Hours Work Strategy or Plan should be subject to community consultation (not just State agency) consultation and no approval for the project should be given until this is the case.

Day-time noise

Our community will also suffer very severe day-time noise impacts.

² See page 12.106 of the EIS

The EIS states that Dulwich Hill will have the highest number of ‘highly affected’ noise receivers in the corridor.³ These properties will be impacted by noise 75 decibels or higher. Bridge works (presumably works on the Wardell Rd bridge) will create 106 highly affected noise receivers alone.

We would argue that, given the severe impacts on Dulwich Hill and the very long construction period, a program should be established to offer residents noise insulation.

This would be in line with the noise insulation offered to residents when the third runway for Sydney Airport opened⁴, although a different set of criteria would need to be developed compared to the airport insulation program which was based on Airport Noise Exposure Forecast contours.

Vibration

Some 74 properties, including 24 heritage properties in streets such as Wilga, Keys and Challis Avenues, would be put at risk of damage from “worse than cosmetic” excessive vibration levels caused by the use of intensive construction equipment. Again, Dulwich Hill have the highest number of heritage properties impacted by vibration along the corridor.

Despite these significant impacts, your Construction Noise and Vibration Strategy offers only to seek to install monitoring when these vibration levels are exceeded. No offer of pre-construction surveys or compensation has been placed on the table.

We are concerned that you are setting a less stringent criteria for what is considered excessive vibration, because the proponent claims applying the criteria in the NSW Government’s Interim Construction Noise Guideline will cause “unnecessary constraints” as your project as a construction project will proceed for a “shorter time period”.⁵

However, this argument is simply false because the construction period is very long – some five years in fact.

As a further insult, pre-construction dilapidation surveys are being offered to owners of public buildings⁶, but not residential buildings. It is not clear why owners of private buildings are being discriminated against.

As such, we ask that the proponent be required to undertake pre-construction dilapidation surveys of all potentially affected properties, to allow a full understanding of the state of the properties before works begin. If the works are affected by vibration, we also ask that the proponent be required to provide compensation to affected homeowners.

Parking impacts

There will be severe parking impacts as a result of this project.

The EIS reports that a total of 27 commuter parking spots would be lost from the carpark to the south of the station during rail shutdown periods, and nine out of the 17 parking spots in Bedford Crescent removed during the entire construction period.

In addition, up to 130 construction workers will want to park in local streets during rail shutdown periods, and up to 60 at other times, also during the construction period.

³ See page 12.25 of Chapter 12 of the EIS – Construction Noise

⁴ See <https://infrastructure.gov.au/aviation/environmental/insulation/index.aspx>

⁵ See page 17 of the Construction Noise and Vibration Strategy

⁶ See page 13 of the Construction Noise and Vibration Strategy

These changes will undoubtedly have an impact on parking currently enjoyed by local residents.

The EIS states that there are 1,260 unrestricted parking spaces within a 400m radius of the station, which are 73 per cent occupied – in other words 340 unoccupied spaces.

The combined loss of commuter parking and construction worker impacts are expected to cause increased competition for on-street parking currently enjoyed by residents.

Given there will be up to 130 construction workers and commuters will be locked out of up to 27 previously available commuter parking spots, we can presume around half of these 340 spaces will now become occupied, leaving less available spaces for residents, including on weekends. This will obviously be a problem in particular for areas closest to the station which are not covered by residential parking controls.

The evidence from other construction projects in the area is that construction workers have no or little regard for local residents and are willing to park across driveways or in illegal locations if it means they can park close to where they are working. They will abuse local residents who challenge them.

As such, we request that funding is provided to Inner West Council to manage parking impacts, including to investigate and establish resident parking schemes (if supported by nearby residents) and to hire additional rangers to undertake parking patrols.

Traffic impacts

The traffic impacts on our suburb will be significant, particularly during rail shutdown periods.

We note the EIS social impact assessment says, in regard to traffic impacts that “during construction, traffic congestion, travel delays, diversions, access and parking restrictions and alternative public transport arrangements may discourage some people from making some trips or access certain areas, cause increased stress levels in some people, and limit access to some areas.

“This could also affect people’s ability to carry out their usual networking and social activities, impacting on community cohesion. These impacts would be particularly experienced by vulnerable groups (e.g. the elderly, people with disabilities and those from culturally and linguistically diverse backgrounds).”

Rail shutdown period impacts

Commuter buses and construction traffic will flood our suburb during the shutdown periods. In particular:

- Marrickville Rd between Darley and Wardell Rd will be packed with anywhere between 600 and 1,020 replacement commuter buses a day (for eight weeks a year from 2019 to 2024 plus on an unspecified number of weekends).
- Other residential streets with significant bus impacts include Bayley St (up to 570 buses), Beauchamp St (up to 570 buses), Ewart St (up to 570 buses).
- This, along with construction traffic, will cause the average vehicle delay for the intersection of Wardell Rd and Ewart St to increase from 32 seconds to 55 seconds, even after mitigation measures. This will particularly impact parents seeking to access St Maroun’s School, which is located on Wardell Rd.

We think these impacts on their own are excessive and will undermine the fundamental character and orderly operation of roads in our suburb and therefore strongly warrant refusal of the project.

To this end, it is concerning that the EIS is unable to say with any certainty what the impacts will actually be, because the exact nature of the temporary transport configuration will only be determined in individual Temporary Transport Plans for each shutdown period.

For instance, the potential impact on Bayley St ranges from 40 buses a day to 570 a day.⁷ In addition, the impact on Wardell Rd could be anywhere from zero additional buses to 230 additional buses a day, depending on what model is adopted.

This makes it impossible to comment on the EIS and also provides an inadequate level of information to residents as to how their street will be impacted.

Given this, we think the approval should state that individual Temporary Transport Plans should be exhibited for public comment, before being allowed to be implemented.

Bridge impacts

Dulwich Hill will experience:

- Partial closures on weekends and nights for the Terrace Rd underbridge and Wardell Rd overbridge for six months.
- Full closure of the Albermarle St overbridge at Marrickville for one month and partial and full closures during weekends and nights for seven months.

These bridge closures will have a further destructive impact on our community, which warrant refusal of the project.

We are disappointed in particular in the approach for the Albermarle St bridge, a bridge which serves local residents. Unlike every other bridge, the EIS fails to even count traffic on the bridge and states, without evidence, that closures “are not expected to have a significant impact on the surrounding local road network as the bridge services a small residential catchment. These works would be covered by a detailed traffic management plan.”

We ask that a proper analysis of the impacts of closing this bridge are undertaken.

Construction haulage routes

We note that quiet residential streets such as Wilga, Keys, Challis Avenues and Albermarle, Beauchamp and Ewart Sts will be used as construction haulage routes.

There appears to be insufficient justification for the use of these streets as heavy vehicle traffic haulage routes, nor information as to how many vehicle movements they will experience. We ask that the proponent be required to produce this information in its response to submissions report.

Heritage and urban design impacts

The Metro’s introduction will have significant heritage and urban designs impacts, mostly on our railway station but also within our heritage conservation areas.

⁷ See page 211 of the Sydney Metro City & Southwest Sydenham to Bankstown upgrade – Technical Paper 1 - Traffic, Transport and Access

We acknowledge the station will bring some benefits, particularly disabled access to the platform and trains and an improved interchange the light rail stop, but this will come at a significant and unnecessary heritage cost.

Station overhead booking office demolition

We note with disappointment that the 1935 weatherboard overhead booking office is to be removed. We note that the building was ranked in second position in the State for significance in an analysis undertaken by the Australian Museum in 2014 and recommended for retention.⁸

This wooden building is an eye-pleasing and contributory element of the Dulwich Hill station group, which is effectively the 'face' of the suburb to visitors and residents. The EIS itself states: "The removal of the overhead booking office would remove an element of high significance in the station. The new concourse would add considerable bulk to the station."

We would like more information as to why the booking office must be removed. None of the diagrams make clear how the platform straightening process imperils it. Given that the EIS states that the Dulwich Hill platform will be left as a curved platform, and not straightened like the other platforms⁹, we remain confused as to why it needs to be demolished.

A process which involves the building being relocated to another community facility would appear to be a wholly second-rate option which removes the building from its important context and reason for being. We would like to pursue every option to retain the building at its current location, such as for a café or community hall.

Platform building

In addition, we also note that the 1935 platform building will be retained but will now be overwhelmed by a modern, generic and large station design.

To this end, we note that the EIS says: "Overall, the proposed ribbon canopies, covered concourse, and station infrastructure would have a major impact on the character and setting of the Dulwich Hill Railway Station Group. The materials likely to be used and the contemporary nature of the proposed new concourse, canopies, and station buildings, would provide a distinctive design **easily differentiated** from the heritage components of the item.

The additional platform screen doors would result in a moderate visual impact.

When considering cumulative impacts overall, the assessment concluded that the project would result in a major visual impact on the Dulwich Hill Railway Station Group."

The above statement leads us to the view that there has been no real attempt to adequately blend the old and the new (see further discussion below on station design).

Overall station design

We object to the proposed approach to have a "consistent line-wide identity" to station design.

While your Sydenham to Bankstown Design Guidelines makes some comments about ensuring local character is included in station design, there is no evidence this will be put into practice apart from the possibility of some local art.

⁸ EIS page 14.25

⁹ EIS page 6:11

Indeed, the Guidelines make repeat reference to “consistent line-wide identity” as the overwhelming design imperative.

For instance, the Guidelines state “entrances to stations including canopies and concourses are to provide a consistent line-wide identity for Sydney Metro and are to be clearly visible from the immediate area.”

It also states “Canopies, roofs and soffits are key elements that should share common materiality and form across all stations to provide a common line-wide identity.”

Overall, we would like to see a new approach to design where the character of the surrounding community is reflected in the station design, rather than a corridor-length generic ‘Metro-design’ approach. We believe the generic approach merely reinforces the perception – and indeed the reality – that the Metro is an ‘invader’ in our community which doesn’t respect our community and the station is the ‘invaders’ new palace’.

We fundamentally object to this approach and request that these words so that they read along the lines of “each of the Metro stations will have a very different design and style, depending on local context and character, and will seek to be as unobtrusive as possible”.

Response to local feedback

At a consultation session held between Metro designers and a small number of Save Dully group members in June 2017, members broadly requested that the station design should seek to be as low-scale and unobtrusive as possible and also reflect the heritage, low-scale character of the surrounding community.

We note that Chapter 7 of the EIS states that the following measures were undertaken in response to this meeting:

- Redesign of shops on concourse and positioning of stairs and lifts.
- Use of natural materials and retention of natural rock face where possible.
- Minimising the scale of the concourse and canopies where possible, having regard to customer requirements.

It is difficult for us to visualise these changes, given we were not able to take copies of the initial station design, and seek to discuss these changes further with the proponent before an approval is given.

Impacts on heritage conservation areas

As outlined above, there will be significant vibration and noise impacts on heritage conservation areas.

Commuting impacts

We consider that the EIS inadequately explores the impacts on commuters during the rail shutdown periods.

The Temporary Transport Strategy indicates a range of different options are being explored and will be refined in individual plans for each shutdown period.

While the EIS has a close examination of potential impacts at individual intersections, it does not provide any overall examination of the extended and increased commuting trip time that commuters will face during shutdowns. Given that up to 1,500 buses will be required on some roads, we expect these increased times will be substantial.

We do not think this is appropriate that this information is not included in the EIS – given it is a fundamental impact of the project which needs to be assessed - and ask that the EIS be re-exhibited with this information, before any approval is given.

Cumulative impacts

It is quite frankly unbelievable that the EIS does not include a cumulative impact assessment of the construction impacts of both the urban renewal strategy and the construction of the railway line.

The EIS states in Chapter 19 that: “The draft Sydenham to Bankstown Urban Renewal Corridor Strategy is relevant to the study area in which the project is located. The draft strategy proposes 35,400 new homes and 8,700 jobs over the next 20 years and associated infrastructure between Sydenham and Bankstown.

“However, due to the draft and strategic nature of this plan, there are no definitive works proposed, and it is not considered as part of the cumulative impact assessment.”

This statement is made despite a separate section of the EIS stating that an intrinsic part of the Metro project is the delivery of urban renewal. Indeed, page 9 of Chapter 6 says the Sydenham to Bankstown project was chosen because it “supports growth”. This indicates that the government believes the urban renewal and Metro construction should go hand-in-hand and therefore the impacts of the two should be assessed together. It is disappointing this has not occurred.

We have analysed the precinct plan dwelling forecasts in the revised Sydenham to Bankstown Urban Renewal Strategy (these dwelling forecasts included the predicted number of new dwellings in five-year timeframes).

Our analysis shows at least 10,000 new dwellings (containing up to 30,000 residents) will be built along the Bankstown line between next year and 2024 while the Metro is under construction. This will include some 810 homes in Dulwich Hill.

This early construction of dwellings has been facilitated by the decision to change the Statewide rules for developer-initiated rezonings in August 2016. This rule change allows developers to use the revised strategy to support their rezoning proposals – even when this strategy is on public exhibition. Developer Mirvac has used this new provision to lodge a major planning proposal for the Carrington Rd estate near Marrickville.

This level of construction in itself will create a huge amount of construction traffic, along with additional demand for rail services when services will be at their weakest.

To us it makes no sense at all to be bringing this number of additional people into the corridor, at the same that the railway line is being shutdown and when construction impacts from the new Metro will be at their highest.

It is even more bewildering to us that this issue is not even examined by the EIS, particularly given from June to September 2017 the urban renewal strategy was subject to a revised and second exhibition (which indicates a strong level of government commitment to the project).

We ask that no approval is given for the Sydenham to Bankstown section of the Metro until a cumulative impact assessment is prepared and exhibited for a further round of consultation. We ask that this assessment look at:

- The traffic, noise, vibration and other relevant impacts of private housing and public rail infrastructure construction at the same time;

- The commuting impacts of new residents placing additional pressure on the Bankstown line, at a time when the line will be at its weakest due to repeated line shutdowns to build the Metro line.

Community consultation

Our concern is that community consultation has been inadequate and information biased and misleading. We have already pointed out that the EIS and the summary brochure say different things on the use of heavy machinery at night.

The brochures and EIS do little to explain the negative impacts of the EIS such as the huge disruption for commuters. We have pointed out above the EIS does not appear to provide information on delays to commuters during the shutdown periods. We also note that the extend of noise, traffic and vibration impacts as graphically outlined in the Social Impact Assessment are not covered in the summary brochure.

The EIS is largely inaccessible to the public due to its length, complexity and the short time allowed to make a consultation, only two months. We note that in the online presentation of the EIS links to many chapters are not adequately presented to the public (ie: a reference is made to "Appendix A" but not a link description as to what area Appendix A covers).

The EIS exhibition has also overlapped with our work liaising with Inner West Council on its submission on the urban renewal strategy, meaning we have had reduced resourcing to concentrate on this huge EIS (estimated to be in the order of 5,000 pages).

Overall, the difficult nature of the community consultation process has meant we reserve the right to raise additional concerns about the Metro at a future time.

Conclusion

In conclusion we can state we are opposed to this project.

We believe that any benefits from this project can be delivered by alternate means and are significantly outweighed by the brutal nature of the construction process.

Despite our over-arching objection, we have suggested major required changes if the Sydenham to Bankstown Metro does proceed under this government.