

Diane Fajmon - Environmental Assessment for the Inner West Light Rail Extension - Submission.

(126)

From: "Geoff Pollard" <logelida2@aanet.com.au>
To: <plan_comment@planning.nsw.gov.au>
Date: 14/11/2010 3:49 PM
Subject: Environmental Assessment for the Inner West Light Rail Extension - Submission.
Attachments: Environmental Assessment Submission.doc

Application reference number: MP 10_0111

Attention: Diane Fajmon

Please find my submission attached.

Thank you for this opportunity to express my opinion.

Kind regards,

Geoff Pollard

Environmental Assessment Submission

Contact Details.

Name: Geoff Pollard

Address: 22 Keith Street, Dulwich Hill

Phone: 02 9559 4348

Mobile: 0412 574 392

Comments/Concerns

After studying the many pages of the report these are my key points I would like to identify. Some of these may be answered elsewhere in the many pages but I was unable to locate the detail.

- 1. Bedford Crescent Traffic Plan** – In chapter 6, page 105 it states that, “the traffic configuration shown for Bedford Crescent is indicative only and is subject to detail design” and on page 108, “The project would include modifications to the existing street parking at Bedford Crescent, Dulwich Hill which would reduce the number of parking spaces available on the street (see Section 10.5.4 for further details). The project would not result in a loss of any other car parking facilities. On-street commuter car parking is predicted to be low, but it is recognised as a potential concern for nearby residents”. I am concerned that the issue of traffic will become “someone else’s” responsibility. Parking issues during the working day already exist in Keith Street and the station car park is normally full. At the same time spaces in Bedford Crescent will be lost. I would like to see the station car park on the southern side of the line extended and restrictions placed on street parking. In addition Wardell Lane is currently used by many pedestrians walking to the station; increased activity could impact their safety. I would like to see a panel established that brings together local residents, Marrickville Council, Transport New South Wales and whoever is responsible for extending the current station car park.
- 2. Keith Lane Station Option** – I do not support this option as I believe it would have disadvantages with traffic, especially increased flow in the narrow Keith Lane.
- 3. Cycle Path at Wardell Road Bridge** (far south end of Greenway Path – Chapter 6, page 113 – I am a regular and competent cyclist but I avoid cycling across the Cooks River Bridge. If I ride on the road, which is narrow, then overtaking cars give me next to no room. Trucks are even more of a problem. If I use the narrow footpath, which is illegal, I risk confronting pedestrians and, as there is no barrier, I risk falling onto the road with disastrous consequences. This major safety issue is not address and I quote “From this point the on-street bicycle path would turn left onto Ewart Street, right onto Riverside Crescent and then right onto Wardell Road leading to the Cooks River”. A separate bridge is required. In addition, an off-road Wardell Road crossing is required that loops under the road at the Cooks River bridge. We will have two fantastic cycle ways; along the Greenway and the Cooks River Cycleway, let us ensure both effectively and safely connect.

4. **Combining Waratah Mills and Arlington Stations at Terry Street** –Chapter 10, page 20, table 10.1 states that the 2016 expected weekday total passenger numbers for Waratah Mills will be 225 and Arlington 185; a total of 410, which is around the number of movements for the most other stations. Why not replace these two stations by having one at Terry Street? Not only would this have financial benefits it would also reduce the impact on Bush Care sites.
5. **Bush Care Management**
 - a. **Bush Care consultation with IWEG** - page 438 – It is critical that ongoing, open collaboration between NSW Transport, contractors and IWEG occurs throughout the length of the project, not only at the design phase.
 - b. **4 to 1 Bush Care replacement** - page 296 – There will be loss to vegetation on most bush care sites. We need to ensure that the practice of replacing this at a rate of 4 to 1 is undertaken. The compensation sites must be created with reference to the GreenWay Revegetation & Bushcare Plan and only after confirmation by the plan owners.
 - c. **Seed Collection and Provenance** - Forward planning of replacement plants will be essential to ensure appropriate and adequate seed collection.
 - d. **Transplanting of plants facing destruction** – Were possible existing plants should be transplanted. These transplants will need adequate care during their re-establishment.
 - e. **Access to maintain the current bush care sites must be guaranteed.** As a volunteer who spends time maintaining sites each week the current restrictions are having major adverse impacts. In the future restrictions need to be flexible and workable. Whilst safety is accepted as paramount a ‘no access’ policy is unrealistic.
 - f. **Remnant local species** – These small pockets e.g., north of Canterbury Road, must be protected from damage.
6. **Fauna**
 - a. **Feral animals** – Actions need to be undertaken forthwith to reduce the population of foxes and cats. Foxes have been recently been sighted in the middle of the day within the corridor. The construction processes will further expose native animals and these know risk factors need to be addressed now.
 - b. **Impact of lighting** – page 290 - Lighting levels must as stated in the report, be as minimal as possible to ensure fauna impacts are prevented.
7. **Electronic Ticketing** – On 13 July, 2010, in a press release, the Minister for Transport, John Robertson stated, “the NSW Government expects light rail to be part of Sydney’s electronic ticketing network, along with trains, government buses and ferries, and private buses.” For patronage levels to approach those expected, this will need to be a reality. As a senior citizen I will not be able to justify utilizing the light rail until this is in place.

Thank you for the opportunity to highlight these matters.

Diane Fajmon - Online Submission from [REDACTED] of n/a (object)

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From: [REDACTED]
To: Diane Fajmon <diane.fajmon@planning.nsw.gov.au>
Date: 15/11/2010 7:49 AM
Subject: Online Submission from [REDACTED] of n/a (object)
CC: <assessments@planning.nsw.gov.au>

Attention: Diane Fajmon,

Thankyou for the opportunity to make a submission. I would like to lodge an objection to the proposed Detour of the Greenway up Weston Street. The Detour is an extremely dangerous option, for both users of the Greenway, and residents. My preference is for the Greenway to be fully enclosed within the Light Rail corridor. The engineers I have spoken to have said ?it can be done?, but it comes down to cost, and dealing with Sydney Water, plus the path would need to narrow at a couple of pinchpoints or give way points.

These Give Way points are a small price to pay versus the Detour option where users would have to navigate reversing cars for half a kilometre.

It will ruin the whole project to have a large 1/2km Detour at the halfway mark of the Greenway.

The EA completely fails to do a patronage assessment on the Greenway. This is despite the proposed Greenway having such a high profile in that it even now has it?s own yearly Greenway Festival launched a few weeks ago. But I think we can be safe to assume that it will have quite high patronage, similar to say the Bay Run, or Cooks River Run, both of which the Greenway physically links in to at either end.

The EA completely fails to understand & properly assess the issue of the Weston Street Detour it is proposing, and has failed to assess a number of major environmental factors.

There are two main stretches of Weston Street, one off from Old Canterbury Rd, which is 12mtrs width across, and has a wider footpath, and the main stretch where I live, which is only 9mtrs wide, and has a thin boutique footpath that is only 231cm wide. (The EA itself has many errors in it for example on page 24 of the EA Volume 2 Tech Paper 1, it states that Weston Street is 18 metres wide!)

The only danger the EA mentions is ?car doors?. (opening into the path of cyclists) It fails to understand or address the problem of reversing cars coming out of driveways. Reversing across the whole Greenway into the path of not only cyclists, but walkers, joggers, roller bladders, roller skaters, prams and scooters, who are all charging down the street at different speeds. The main stretch of Weston Street is only 9mtrs wide, and the footpath (including path and nature strip in total) is only 231 cm wide, from house boundary to gutter. It is like a tiny thin boutique footpath, definitely nowhere near the normal width. The actual house dwellings are quite close to the house boundaries too- my lounge room is just 239cm from that thin footpath, that herds of Greenway traffic will be travelling through at all unregulated hours of the day and night.

The EA fails to address the issue of noise pollution from the Greenway. It?s hours of operation & noise levels will be totally unregulated! This is made even worse by Weston Street having an extremely low ambient noise level. Any noise on the street itself echoes across into homes even with all the windows & doors shut. That?s the low-ambient effect.

An ?on-street? Greenway Detour means that privacy or noise screens can never be put up. Yet, if the Greenway is enclosed in the rail corridor, screens can be put up now, and added to in the future if required. The noise issue will be horrific if the Detour goes ahead.

For the EA to totally ignore the Greenway noise after they stated Weston St has the lowest ambient noise of the entire project is a real failure in the EA process.

With such a thin footpath, on Bin Night there is very little room for the bins, let alone a Greenway! It would create quite an obstacle course for the Greenway pedestrian traffic. The next day when the bins are emptied, they lie

scattered everywhere, many on their sides blocking the path completely, for the whole half a kilometre of Weston St.

So, for two days & nights a week, the Greenway will be an obstacle course!! There is no room to widen the footpath, as the street itself is thin at 9mtrs across & considering it has cars parked on both sides, two way traffic, and two way proposed cyclists (trying not to get hit by reversing cars coming out of driveways.)

Also, many of the driveways have gates that open outwards that will ?shut? the Greenway each time they are opened, or left open, as they stretch right out across the whole thin boutique footpath almost to the gutter!

The EA report falsely states that Marrickville Council agree Weston St is ?a good choice of route for an on-street cycleway?. This is incorrect- it flies in the face of repeated Marrickville Council motions to petition Transport NSW to ensure the Greenway is within the dedicated Light Rail corridor. Marrickville Council were made aware of this error in the EA, and moved a new motion at council meeting 9/11/10 to re-iterate the same point, to clear up any confusion created by the inaccurate EA report.

Due to all these critical errors, failures and oversights in the EA, I would encourage someone from the Dept of Planning to actually come down to meet myself & the other residents of Weston Street, for us to show & explain the dangers we have identified that will affect all Greenway users. We know the street well & are acutely aware that for the sake of all users, the Greenway must be enclosed within the Light Rail corridor.

The safety of all users is our most urgent and pressing issue. And also to ensure that a totally unnecessary detour not be taken that will detract from the quality of the whole project. Secondary to that, we can convey the horrific destruction of our street?s extremely quiet character that the invasion of having something as big as the noisy and vibrant Bay Run going up it so close to houses on a street with extreme low ambient noise.

Please feel free to make contact any time by phone, or in person, to help clarify any of the points, especially in light of the mistakes, failures, and oversights of the EA report.

My only other point, is I find it strange that the proposed Waratah Mills station is not at the actual Waratah Mills! Instead the proposed station is in fact on Weston Street. I think the Waratah Station should be moved 20metres or so up further so it is actually at the Waratah Mills site. There would be easy access from the Mills complex on one side, and from Hoskins Park / Pigott St on the other side.

Thankyou,

[REDACTED]

You can publish all of my submission, but I would prefer not to publish my name, address or phone number.

Name: [REDACTED]

Organisation: n/a

Address:

[REDACTED]

[REDACTED]

Submission for Job: #4097 Project Application

https://majorprojects.onhive.com/index.pl?action=view_job&id=4097

Site: #2291 Sydney Light Rail Inner West Extension

https://majorprojects.onhive.com/index.pl?action=view_site&id=2291

Diane Fajmon - Online Submission from Robert Wiggins (support)

From: Robert Wiggins <robert@ussie.com>
To: Diane Fajmon <diane.fajmon@planning.nsw.gov.au>
Date: 15/11/2010 3:04 AM
Subject: Online Submission from Robert Wiggins (support)
CC: <assessments@planning.nsw.gov.au>

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I think that this is an unbelievable opportunity for further revitalization of the inner west
To have Tram stops along with bike and walking paths will assist in the gentrification of these areas that has been occurring over the past few years
We own a couple of investment properties in these areas and fully support this project

Name: Robert Wiggins

Address:
27 Montague Rd
Cremorne

IP Address: 124-169-1-149.dyn.iinet.net.au - 124.169.1.149

Submission for Job: #4097 Project Application
https://majorprojects.onhiive.com/index.pl?action=view_job&id=4097

Site: #2291 Sydney Light Rail Inner West Extension
https://majorprojects.onhiive.com/index.pl?action=view_site&id=2291

Diane Fajmon

Senior Planner - Roads and Rail

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From: Julian Hall <julianhall2@bigpond.com>
To: <plan_comment@planning.nsw.gov.au>
Date: 13/11/2010 8:30 am
Subject: Attention: Diane Fajmon: Re: application reference number: MP10_0111

Ms Fajmon,

As long time residents of Weston Street, Dulwich Hill, we want the extra money spent on ensuring the Greenway is safely enclosed within the Light Rail Corridor and not a detour up Weston Street.

As parent's of two young children the mix of walkers, joggers , bikes, prams etc causes with cars reversing out of driveways and street parking, causes us great concern for the safety of not only our children, but those forced to use the corridor diversion on our street.

The benefits of having the Greenway inside the Rail Corridor is that everyone is safe on a dedicated track.

We have chosen this part of Dulwich Hill because of it's quietness and safety for our children. By having the greenway corridor down our street, creates unregulated noise pollution at the front of our houses - which cannot be screened, removal of our trees, flouro painted bike tracks etc and again a huge safety issue which is completely unacceptable.

This proposal to provide a detour is not world class. This is a cost cutting exercise that will expose our children to the dangers of all what we have mentioned above.

Kim & Julian
16 Weston Street
Dulwich Hill

0439 416 938

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From: Craig Bailey <bails996@me.com>
To: <plan_comment@planning.nsw.gov.au>
Date: 13/11/2010 1:00 pm
Subject: REF: MP 10_0111 - Western st Greenway

Hello Diane,

REF: MP 10_0111

I am apposed to the greenway detour up Western Street and would rather see the money spent on continuing the greenway through the rail corridor.

I stand to possibly lose my cul-de-sac parking and the privacy of my front lane if the detour goes ahead.

It will also impact on the safety of my children if bicycles are riding past my front gate.

Regards
Craig Bailey
119 Old Canterbury Road
Dulwich Hill

Diane Fajmon - Application Reference number MP 10_0111 Attention Diane Fajmon

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From: "John Mur" <johnf.murphy@bigpond.com>
To: <plan_comment@planning.nsw.gov.au>
Date: 13/11/2010 1:14 PM
Subject: Application Reference number MP 10_0111 Attention Diane Fajmon

Major Projects Assessment
Department of Planning

Attention Diane Fajmon.

Dear Ms Fajmon,

Per our letterbox today we received a notice urging us oppose the proposed stops for the future light rail of Arlington and Waratah Mills.

Our family and all the neighbours I have spoken to vehemently support retention of the two stops and oppose the concept of amalgamating the two into one.

The proposition that walking an extra 200 metres to the stop would have "a negligible impact on stop walk catchments" is simply incorrect, especially in the case of people who are invalid or aged. It would make a significant difference to residents in our area as we would have to cross Old Canterbury Rd to access the Lewisham West stop.

The leaflet exhorts us to protest against "the extensive, unnecessary and ultimately costly overlap of catchments". This statement is not backed up by any documentation. My feeling is that it is an exaggerated statement and designed to prosper the case of some residents of Weston St who are opposed to bikes being ridden on their quiet street.

I exhort you to ignore this group of activists and consider the good of all the residents, especially the aged, invalids, mothers with small children etc. I suspect the activists have confused the role of light rail with heavy rail. The success of light rail rests with its accessibility by walking.

Thanks for your consideration,

Warm Regards,
John Francis Murphy
28 Windsor Rd
Dulwich Hill NSW 2203
02 9560 5421

Diane Fajmon - Re: Application reference number: MP 10_0111

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From: Daniel Cutbertson <daniel_a_cuthbertson@yahoo.com.au>
To: <plan_comment@planning.nsw.gov.au>
Date: 13/11/2010 2:23 PM
Subject: Re: Application reference number: MP 10_0111

Dear Diane Fajmon

My wife and I are residents of Dulwich Hill. Our address is 44 Weston Street.

Our preference for the proposed Greenway is that additional money is spent to ensure it is enclosed within the Light Rail corridor and not detoured onto Weston St.

We feel that a Greenway on the street is a less safe option as additional foot and cycle traffic will make it difficult for cars pulling out of driveways. In addition we have a 7 month old baby for which we would like to walk with our stroller. We feel that having a Greenway competing with cars reversing out of driveways is a dangerous idea.

Our street is a quiet pleasant tree line street. Removing trees to widen the access will reduce the aesthetic appeal of the street. Unregulated additional noise on our doorstep will inter-fear with our baby's sleeping patterns.

The street is already hard pressed to find parking, additional pressure on this will cause a lot of congestion and inconvenience.

We request that you ensure the Greenway is enclosed within the Light Rail corridor.

Regards

Daniel and Sonia Cuthbertson
(Registered voters and council rate payers)

Diane Fajmon - Re: Application Reference Number: MP 10_0111

From: "Evelyne" <eludwig@bigpond.com>
To: <plan_comment@planning.nsw.gov.au>
Date: 13/11/2010 4:44 PM
Subject: Re: Application Reference Number: MP 10_0111

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Attention: Ms Diane Fajmon

Good Afternoon Diane

Re: Application Reference Number: MP 10_0111

My preference is that the extra money be spent to ensure the Greenway is safely enclosed within the Light Rail Corridor, and **not detour up Weston Street.**

Downsides to having a Detour up Weston Street include:-

- . A 1/2 km detour at the halfway mark of the Greenway ruins it, and is not world class.
- . Ugly Flouro painted bike tracks (the EA now mentions the use of colour - see page 24).
- . Bikes mixing with cars on the road, and issues when cars reversing out of driveways.
- . Walkers, joggers, prams, and roller bladers having issues with cars reversing out of driveways, issues with open driveway gates blocking their path, and issues having their path blocked for 1/2 km on bin night and the next day as a virtual obstacle course.
- . Tree removal to upgrade and widen pedestrian/jogging path on the eastern side.
- . Unregulated noise pollution at the front of houses that cannot be screened at all (at least at the back of houses, screens can be erected along back fences).

Benefits of having the Greenway at the back of houses, inside the Rail Corridor:-

- . Everyone is safe in a dedicated Greenway track.
- . Privacy screens can be erected now, and in the future as required.

Thank you for taking my comments into consideration.

Yours sincerely,

Evelyne Ludwig
Resident of Weston Street.
02 9568 3177.

Diane Fajmon - Submission re turner Av. Haberfield bridge

From: "Nick Vasta" <vasta@sydney.net>
To: <plan_comment@planning.nsw.gov.au>
Date: 13/11/2010 5:49 PM
Subject: Submission re turner Av. Haberfield bridge
CC: "Kelly Brazier" <kellybrazier1234@hotmail.com>



Submission re turner Av. Haberfield bridge
one area of concern is the proximity of turner av to waratah st. there is a lot of traffic that comes down waratah st turns right into Hawthorne pde and then onto Marion st. if a bridge was placed at turner ,then there would be too much traffic at the focal point of the turnaround at waratah ...as soon as traffic comes through the roundabout it would be immediately faced with traffic and parking vehicles at or near turner. There needs to be a distance between the roundabout at waratah and Barker. The logical alternative would be to have the bridge further down Hawthorne parade where there is little or no traffic ,there is simply not enough space between waratah and turner

"We live in Turner Avenue Haberfield and write to object to the proposed pedestrian bridge for light rail near Turner Avenue. We are very concerned that the bridge will bring significant traffic and parking problems to our street, and give direct access to Cafe Bones and the off leash dog park on the other side of the canal which will add to those problems. The children's playground at the bottom of Turner Avenue is already located there and has a lot of associated parking and cars coming and going on weekends.

We request that there be no bridge at this location, and if there must be a bridge other than where the existing bridge is already located, that any new bridge be relocated away from giving direct access to Cafe Bones and the dog park, and away from the playground, so that our street is not unduly affected by all of these issues.

We are also very concerned about the impact of parking for light rail in our streets generally and ways to discourage light rail commuters from driving to stops, must be considered. The stop at Hawthorne, near Turner Avenue on the Haberfield side, will otherwise be a very attractive stop for commuters to drive to and park, from all around Haberfield, Five Dock Russell Lea and surrounds, as we are in a quiet accessible area unlike stops such as Marion and Norton Street which are affected by traffic congestion and lack of street parking. "

vasta 12 turner av Haberfield 97984600

Nicholas

Diane Fajmon - Light rail extension, Lilyfield to Dulwich Hill - cycle and pedestrian access

(135)

From: Clare McNally <clare.mcnally@optusnet.com.au>
To: <plan_comment@planning.nsw.gov.au>
Date: 13/11/2010 6:27 PM
Subject: Light rail extension, Lilyfield to Dulwich Hill - cycle and pedestrian access

I understand that the current proposal for this development requires pedestrians and cyclists to cross the road at Marion Street, Leichhardt. This has serious safety ramifications particularly regarding children riding bicycles. An alternative would be to build a bridge over Marion St that is attached to the side of the rail bridge. The bridge alternative will also provide safer access to the light rail stop immediately north of Marion St for light rail passengers. Marion St already has a lot of motor cars and buses using it. Increased pedestrian and bicycle activity will cause Marion St to become even more congested. The pedestrian cycleway feature is one of the great pluses and an exciting feature of this development. Let's take the steps to make it safer NOW rather than decide in the future that a crossing is required after deaths and injuries occur, and when significant traffic issues occur. In the long term this will save money, lives and motorist's frustration.

Yours sincerely,
Clare McNally
36 Orpington St
Ashfield NSW 2131

**Diane Fajmon - Application reference number: MP 10_0111; Attention: Diane Fajmon ;
Light Rail Extension Submission**

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From: "kerrylack1" <kerrylack1@optusnet.com.au>
To: <plan_comment@planning.nsw.gov.au>
Date: 13/11/2010 6:36 PM
Subject: Application reference number: MP 10_0111; Attention: Diane Fajmon ; Light Rail Extension Submission

**Application reference number: MP 10_0111
Attention: Diane Fajmon**

LIGHT RAIL SUBMISSION – NOISE AND VISUAL IMPACTS

The Environmental Assessment for the Light Rail extension to the Inner West shows operational noise exceedences at seven properties. These properties are all located within a short distance from each other (around 400 metres). Four of the seven properties are within 100 metres of each other. This indicates that noise issues would likely apply to houses within this area rather than just the isolated properties mentioned in the report.

I live in Victoria Street, Dulwich Hill between four properties shown to have clear operational rail noise problems (Short St, 108 Victoria Street and 29 Eltham Street). This section of the proposed rail extension differs from other parts of the Sydney light rail network in that it is very close to residential properties. My property and surrounding properties are all very close to the proposed light rail extension. Given the elevation of the light rail track these properties would also have no visual privacy from high frequency trains operating on the track.

The report while recognising noise problems only recommends considering mitigation measures some time after operation of the train line begins. This is despite the report noting it would be more cost effective to undertake mitigation measures such as corridor noise barriers at the construction phase of the project. The planning phase of the light rail extension project should proactively mitigate known noise problems rather than consider some isolated actions for some affected properties sometime after operation of the train line commences.

A more economic and community responsible approach would be to undertake noise mitigation actions prior to operation of the train line that would be applicable to the noise impacted area. Noise mitigation options canvassed in the report such as rail dampers and noise barriers are effective and economic. It would also be sensible to link strategies to reduce visual and noise impacts of the project given that proximity to the rail line is the key criteria for both issues.

There has been numerous noise issues associated with the operation of light rail services near residential properties in the United States. This resulted in significant community backlash and required retrofitting of sound absorption panels. The planning process for the Sydney light rail project should be informed by this overseas experience.

Regards

Mr K Lack

102 Victoria Street
Dulwich Hill 2203

Diane Fajmon - Inner West Light Rail Extension - Submission in Response to Environmental Assessment

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From: "Andrew Silk" <asilk@martinbell.com>
To: <plan_comment@planning.nsw.gov.au>
Date: 15/11/2010 9:16 AM
Subject: Inner West Light Rail Extension - Submission in Response to Environmental Assessment
Attachments: Bedford Cres-EA Submission 15 11 10.pdf

Application reference number: MP 10_0111
Attention: Diane Fajmon

Dear Madam,

Please find submission attached.

Andrew Silk

Diane Fajmon - Inner West Light Rail Extension - Submission in Response to Environmental Assessment

From: "Andrew Silk" <asilk@martinbell.com>
To: <plan_comment@planning.nsw.gov.au>
Date: 15/11/2010 9:30 AM
Subject: Inner West Light Rail Extension - Submission in Response to Environmental Assessment

Application reference number: MP 10_0111
Attention: Diane Fajmon

Dear Madam,

I sent an email with submission attached a few minutes ago and received an email acknowledging receipt. However, I have realised that I did not give my contact details which are now shown below.

Regards

Andrew Silk
Associate

Martin Bell & Co
102/370 Pitt Street,
SYDNEY NSW 2000
Telephone: (612) 92838411
Facsimile: (612) 92838511
Mob: 0408102623

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Response to the Submission to the Sydney Light Rail Extension - Stage One - Inner West Extension Environmental Assessment

We are residents of Bedford Crescent and wish to respond to the Environmental Assessment (EA) in relation to the location of the Dulwich Hill Interchange.

The EA proposes that the interchange be located immediately adjacent to the Dulwich Hill heavy rail station (EA proposal). The EA also identifies two alternative locations a little further back along the light rail track near Jack Shanahan Park (Shanahan Park Alternatives).

We object to the EA Proposal and support the Shanahan Park Alternatives.

The EA Proposal is stated to have one advantage; proximity to Dulwich Hill railway station. We feel that the advantage the EA proposal has over the two Shanahan Park alternatives is overstated and is outweighed by the advantages of the alternate locations.

Locating the interchange at either of the Shanahan Park Alternatives will not deter potential users of the light rail who wish to connect with the heavy rail or bus service; or vice versa, from doing so as the distance is not great.

The distance between Dulwich Hill heavy rail station and the Shanahan Park Alternatives is less than the 400 metre walk-up catchment radius for the light rail stop. It is also less than the distance between stops and connecting services at other stops on the line, for example the distance between Lewisham light rail and heavy rail stations. The Shanahan Park Alternatives allow for easy access to the train station via Bedford Crescent and perfectly adequate connectivity.

The EA Proposal has a number of major drawbacks, such as:

- permanently bisecting the community;
- significant loss of parking in Bedford Crescent;
- increased noise and vibration in Bedford Crescent and district from existing heavy rail and freight lines due to cliff excavation;
- environmentally intrusive excavation of Bedford Crescent sandstone cliff face;
- loss of native tree planting in Bedford Crescent and attendant loss of local fauna;
- increased light pollution in Bedford Crescent and district;
- visual impact from the trams and infrastructure such as power poles and cables close to houses.

Opening up the district

One of the major benefits of the light rail extension project for all neighbouring suburbs is that each station, doubles as a crossing point. Residents, on either side of the line, who were previously unable to connect with each other except by one of the few pre-existing rail bridges and tunnels will now have increased access across the line. This improved access is a wonderful associated benefit for the community above and beyond the immediate advantages brought by the improved transport infrastructure.

Currently parts of the district at the southern end of the light rail line are cut off from one another by the light rail line as well as by the existing heavy rail and freight rail lines. There is no proposed crossing point between Dulwich Grove and the EA proposal in the EA.

People on the west of the light rail line currently have to travel via Ewart St and Wardell Rd if they wish to access the Dulwich Hill station, connecting bus routes and shops. This problem is duplicated for residents east of the line who have to travel the reverse route to access Jack Shanahan Park, Cooks River recreational areas, local bus routes (Routes 406, 418) and the proposed Greenway. This restriction will remain if EA proposal is implemented.

The Shanahan Park alternatives on the other hand provide excellent community access between both sides of the line, shops, bus and rail routes, Shanahan Park, Cooks river recreational areas and the proposed Greenway as well as increasing the catchment to the heavy rail station by providing more direct access.

With the building of the light rail there is a once-in-a-lifetime opportunity to open up the district.

Shanahan Park is an under-utilised destination for the community as a whole primarily as it has only one entrance. The Shanahan Park alternatives open up access to the park creating additional entrances to this park for light rail users and the broader community.

All of these potentially significant benefits for our community will be lost if the EA Proposal goes ahead. This runs counter to one of the key Project Objectives of enhancing livability by improving local accessibility and amenity along the corridor (EA Vol 1: Part A page 3).

Reduction of Parking

The EA Proposal will also result in a drastic loss of parking in Bedford Crescent. Bedford Crescent presently has approximately 30 rear-to-kerb parking spaces on its southern side and about 12 parallel spaces on the northern side totaling about 42 spaces in the street.

It is currently difficult to find a parking space in Bedford Crescent as demand for these spaces by commuters, residents and visitors to the adjacent shops in Wardell Road is heavy.

Demand for residential parking in Bedford Crescent is higher than in other streets as a number of residents do not have parking in front of their houses

because the street narrows to a laneway at its western end. This increases competition amongst residents for the limited number of spaces available, to say nothing of the competition that occurs daily for these spaces with rail commuters.

Under the EA Proposal, all the rear-to-kerb parking will be lost and the only parking that will be retained is a small amount of parallel parking (approximately 6-8 spaces) on the south side. This is a net loss of 36 places. The EA Proposal suggests that increased road traffic to the light rail terminus will result in a requirement for an additional 14 parking spaces. The 36 lost spaces together with the additional 14 spaces will result in a net shortfall of between 48-50 spaces.

Page 213 of the EA states that the EA proposal will result in the removal 10 parking spaces in Bedford Crescent. This is plainly wrong.

The Shanahan Alternatives have no negative impacts for parking.

There is presently an application before Marrickville Council for the north side of Bedford Crescent to be restricted to residents only.

Traffic management

The EA Proposal suggests a turning bay in front of 7 Bedford Crescent, extending as far as 15 Bedford Crescent. A turning bay at this point in Bedford Crescent is unrealistic, particularly as it tapers toward its western end, becoming a narrow walkway from number 13, connecting to the southern end of Macarthur Parade. As presently drawn, it seems that the turning bay roadway will take over the entire footpath from numbers 9 to 11 Bedford Crescent, right up to the boundary of those properties with total loss of footpath.

Environmentally Intrusive Excavation

We are very concerned that the EA Proposal underestimates the amount of excavation of the Bedford Crescent sandstone cliff face that will be required. The EA Proposal is for two light rail tracks separated by a 4 metre wide platform plus a lift well space to the north of the tracks. We are concerned that, in reality, construction would actually require far greater excavation of Bedford Crescent than the present sketch envisages. This would result in even greater narrowing of Bedford Crescent and even greater loss of parking and access along Bedford Crescent than is presently proposed.

We are also concerned that, in order to fit the double track plus platform and lift well space into the proposed location at Wardell Road, a much tighter turn in the tracks at the signal box at the southwest of Shanahan Park will be required than is envisaged in the EA Proposal. This would increase costs; noise, vibration and light impacts, reduce visual amenity in the district and exacerbate the parking and traffic problems referred to above.

Noise

The EA includes a comprehensive noise assessment report provided by Heggies. They have measured current ambient noise levels at various points

along the track and estimated the noise that will be generated by the operation of the light rail. They have not estimated the potential increase in noise in Bedford Crescent that will occur when a section of the cliff face is removed.

Bedford Crescent runs along the north side of the Bankstown Cityrail line and the Port Botany / Enfield freight line. Freight trains run 24 hours a day, 7 days a week. This creates noise problems through the night, disrupting sleep. Traffic on the freight line is set to increase by 250% in the next few years as Port Botany is developed and freight is increasingly moved by train.

If the cliff face is excavated as required by the EA Proposal, there will be an increase of rail noise from existing freight and heavy rail lines in Bedford Crescent and the surrounding district. This is because the cliff face presently acts as a buffer or guard and deflects sound.

Implementing the Shanahan Park Alternatives would avoid this.

Native Tree Loss, Lighting Impacts and Visual Impacts

The EA proposal requires the removal of existing native street tree planting which will result in loss of screening of light sources from Dulwich Hill railway station and shops in Wardell Road. It will mean an increase in light impacts to Bedford Crescent and a loss of habitat for native bird life.

The construction of infrastructure to support the light rail will result in unsightly visual impacts from light and power poles and cables and will lower the amenity of Bedford Crescent. This impact would be significantly reduced by locating the interchange at one of the Shanahan Park Alternatives.

The Alternative Proposals

As far as the two Shanahan Park Alternatives are concerned, the second of those, closer to the entrance to Keith Lane is preferred. Of the two, it is closer to being at grade and will require less infrastructure, for instance, it does not require a lift.

Andrew Silk, Melissa Silk, Jane King, Glinda Major, Don Francis, Kathy Gollan, Stephanie Mancell, Ian, Anthea Windsor,

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FAX TO : (02) 9228 6455

From: Jeffrey Herron <jeffherron@unwired.com.au>
Subject: **LightRail/Greenway**
Date: 14 November 2010 6:59:04 PM
To: plan-comment@planning.nsw.gov.au

Attention: Diane Fajmon

Having just walked sections of the proposed Greenway including Weston St., as an independent observer, it does seem preferable to look for innovative solutions that would keep the Greenway within the rail/canal corridor (part beside /below/above?) rather than divert via Weston St. Hopefully where there's a will there's a way.

Thank you for the opportunity to comment.
Jeff Herron, 55 Victoria st, Lewisham.

The above email "failed" so will try
fax number.

Diane Fajmon - Online Submission from Colin Jones (object)

139

From: Colin Jones <Colin.N.Jones@GMail.com>
To: Diane Fajmon <diane.fajmon@planning.nsw.gov.au>
Date: 15/11/2010 2:06 PM
Subject: Online Submission from Colin Jones (object)
CC: <assessments@planning.nsw.gov.au>

Given the frequency of service proposed for the light rail, the opportunities provided my modern signalling and civil construction and excavation I object to the failure of the proponents to provide short sections of rail as would permit some single track light rail and adjacent cycle path so as to provide a continuous cycleway within the current goods rail formation from the Rozelle Goods Yards (and by extentions to Glebe and Anzac Bridge) to Dulwich Hill.

The availability of the goods rail corridor provides an excellent opportunity to provide a first rate cycleway from the inner west to the city and with other existing and proposed cycleways to the southwest , west and northwest of the metropolitan area. This will have the effect of getting cyclists out of cars and other powered vehicles and reducing both congestive and environmental effects on the city as well as providing healthy lifestyles and improving health outcomes.

In particular a cycleway in the cutting in the corridor between Haberfield and Rozelle could provide a replacement to a number of existing on road cycleways including the very steep and dissuasive cycleway along Lilyfield Rd between Haberfield and Rozelle. Either a single rail operation could be adopted in this section or the cutting could be widened by rock cutting or made more perpendicular.

On the quoted operating rates of the light rail, timing will be impacted much more passenger loading unloading times than by timetabled journeys down a single track section.

In addition it is important that the cycleway follows the goods rail corridor closely to take advantage of the level nature of the rail corridor and proximity to crossings proposed and that it take the most direct route to the city as possible. In addition alignment in environmentally sensitive areas of the greenway should be available at all costs.

The engineering to provide provide single track work is relatively easy and the railtrack along Northern Zealand in denmark and in other areas is instructive of this type of opertion.

Name: Colin Jones

Address:
PO Box 298
SUMMER HILL

IP Address: cpe-124-189-80-14.azsz1.cht.bigpond.net.au - 124.189.80.14

Submission for Job: #4097 Project Application
https://majorprojects.onhiive.com/index.pl?action=view_job&id=4097

Site: #2291 Sydney Light Rail Inner West Extension
https://majorprojects.onhiive.com/index.pl?action=view_site&id=2291

Diane Fajmon - Online Submission from Kate Hoffman (support)

140

From: Kate Hoffman <kate.tarah@gmail.com>
To: Diane Fajmon <diane.fajmon@planning.nsw.gov.au>
Date: 15/11/2010 12:42 PM
Subject: Online Submission from Kate Hoffman (support)
CC: <assessments@planning.nsw.gov.au>

This is a great project and good to have a station at Davis St. The walking and cycling track will be an asset for me and my grandchildren. I am concerned that the bush that has been planted by volunteers will be wrecked and I hope that compensatory sites will be developed and funded by the government in the meantime. We dont want the volunteers locked out of the corridor so the weeds take over while the project is being built.

Name: Kate Hoffman

Address:
2/6 Nelson St
Dulwich Hill

IP Address: 60-241-7-31.static.tpgi.com.au - 60.241.7.31

Submission for Job: #4097 Project Application
https://majorprojects.onhiive.com/index.pl?action=view_job&id=4097

Site: #2291 Sydney Light Rail Inner West Extension
https://majorprojects.onhiive.com/index.pl?action=view_site&id=2291

Diane Fajmon
Senior Planner - Roads and Rail

P: 02 9228 6370
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E: diane.fajmon@planning.nsw.gov.au

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Diane Fajmon - Online Submission from [REDACTED] of Resident (object)

(141)

From: [REDACTED]
To: Diane Fajmon <diane.fajmon@planning.nsw.gov.au>
Date: 15/11/2010 12:17 PM
Subject: Online Submission from [REDACTED] of Resident (object)
CC: <assessments@planning.nsw.gov.au>
Attachments: EA Submission_FINAL.pdf

Attention: Diane Fajmon
Reference no: MP 10_0111

Name: [REDACTED]
Organisation: Resident

Address:

[REDACTED]

Submission for Job: #4097 Project Application
https://majorprojects.onhiive.com/index.pl?action=view_job&id=4097

Site: #2291 Sydney Light Rail Inner West Extension
https://majorprojects.onhiive.com/index.pl?action=view_site&id=2291

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Attention: Diane Fajmon

Reference no: MP 10_0111

Dear Ms Fajmon,

The following pages detail the concerns of the residents of Davis, Weston and Windsor Roads, as represented by the BetterLightRail (BLR) resident group.

We strongly object to the following aspects of the Environmental Assessment for the extension of the Sydney Light Rail and construction of the GreenWay on three matters:

1. We object to the detour of the GreenWay from the light rail corridor into Weston Street.
2. We object to the location of the proposed Waratah Mills stop.
3. We object to the EA's analysis of the impacts of this project and feel it is lacking in critical areas.

We have prepared a submission on these matters because we are uniquely affected by the proposed project to an extent far exceeding that of other sections of the community.

This is because it is only at Weston St that the GreenWay deviates from the light rail corridor to detour down Weston Street. In addition to this, the Waratah Mills light rail stop will be accessed from Weston and Davis Streets, with the operation of the light rail running along the back of the eastern side of Weston Street. Essentially, this project envelops Weston Street – the GreenWay detour at the front and the light rail at the rear of homes on Weston Street.

We believe that the Environment Analysis (EA) by Transport NSW (TNSW) fails to address areas that are of key concern to Weston Street residents; specifically privacy, safety and sustainability. We seek some assurance that these areas will be addressed, given their overall impact on the amenity of our residences.

Further, we propose two alternatives that would better meet the outcomes of the project itself, as stipulated by TNSW, and rectify the mistakes identified.

This submission will be divided into four parts.

Part 1 will critique the relevant sections of the EA, as they relate to Weston Street, Davis Street and Windsor Road residents and highlight where we consider it has not in fact

met the Director General's Requirements (DRGs) and needs further assurance or investigation.

Part 2 will provide an alternative approach to the proposed GreenWay detour that we would like to have investigated more fully and reported on (the EA mentions this alternative, but does not provide much detail).

Part 3 will provide an alternative approach to the location of two light rail stops that we would like to have fully investigated and given proper consideration.

Part 4 will briefly address a pamphlet which was produced and distributed by EcoTransit on 1 November 2010 misrepresenting the position of this submission.

Please note that while we are happy for our contact details to be made available to the Proponent, we do not want them published on the Department's website or by any other means. We particularly are concerned about EcoTransit obtaining our private contact details given their actions to date (see Part 4 for more details).

We seek a revised EA be submitted under Section 75H. However, should TNSW support any of our suggestions then we look forward to commenting on the preferred project report.

Part 1: Critique of the Environmental Assessment as per the Director General's Requirements

Part 1 of our submission will critique the sections of the EA as they pertain to the residential areas mentioned, highlighting inaccuracies or inadequacies as they relate to the DGRs.

In summary, our key findings are that:

1. The EA does not adequately address the proposed GreenWay detour down Weston St;
2. The EA should address this detour separately, given the landscape changes materially, and the impact alters significantly;
3. The EA fails to properly and comprehensively account for the impact of the light rail and proposed light rail stop (Waratah Mills); and
4. Above all, the EA fails to examine the *cumulative* impact of imposing a GreenWay detour, light rail and light rail stop within one small area — a significant impact on an area identified as the quietest on the entire proposed light rail extension.

The main body of the EA notes that one of the objectives of this project is to “enhance livability by improving local accessibility and amenity along the corridor” (p. xxi). This is a noble objective, but apparently not one required to be applied equitably. A critique of each pertinent section of the EA soon demonstrates that whilst this may be the case for surrounding areas further away from the corridor, it has in fact the opposite effect for those living near it.

Yet the main body of the report states that the purpose of the EA is to assess the potentially adverse impacts and detail the required management strategies to avoid and minimize these adverse impacts (p. xxviii). This is why we can only surmise that the neglect of several key impacts or the provision of mitigation strategies for impacts identified can only be attributed to the haste with which the report has been prepared. However, these areas will need to be addressed, if only because the impacts are so material. Each impact is discussed below in the context of each EA chapter.

Chapter 7 – Construction of the project

This chapter provides an overview of the proposed construction works that are required to implement the Project, including an indicative timeframe for each component (i.e. the 'construction plan'). However, the construction plan does not mention the proposed Weston Street detour as a separate construction work. The chapter either considers the construction of the detour as part of its discussion on the GreenWay, or not at all.

Given the unique nature of the Weston Street detour (i.e. it is unlikely that the construction required for the GreenWay will be the same as that required for the GreenWay detour) it is strongly recommended that this component of the Project be identified and discussed as a separate work.

Consequently, the study does not respond to DGRs that are considered to be key issues for detour residents. A list of the relevant DGRs are below.

Notwithstanding the omission above, the proposed Weston Street detour is identified within this chapter as being part of the construction footprint in Figure 7.1e. It is also mentioned in the chapter in terms of construction of upgraded footpaths near stops. These works are identified under 'Other works' as 'Urban design works'.

Specific sections lacking sufficient discussion

It is considered that the following areas of the study require discussion on the construction of detour works, or clarification that the works identified as part of the GreenWay will also be required for Weston St:

- 7.3.4 – section titled *GreenWay shared path construction* - for example, depending on the nature of the improvements proposed, it is possible that Weston Street upgrades would require temporary closure of the street to traffic.
- 7.3.4 - section titled *Finishing works* – discusses works required in GreenWay (eg. Line markings, lighting) – question whether this will occur in a similar manner to the finishing works required for the detour in Weston Street.
- 7.4 *Materials* – it is unlikely that the materials for the GreenWay proposed within the existing corridor will be the same as that required within the detour/s.
- 7.10 *Erosion and sedimentation management* – identifies that construction compounds and work sites will be required for GreenWay – clarification required as to whether this includes Weston Street.

- As for 7.10, assuming any construction for the GreenWay will differ in nature from construction within the detour, the above clarification is required wherever the GreenWay is discussed generally throughout the chapter.

Response to DGRs

Where appropriate, the EA's response to the DGRs should cover the GreenWay detours.

The following DGRs are key issues for detour residents that are not addressed in this study:

- Assessment of key issues – specifically 1) the potential impacts of the project at ... construction stage; and 2) description of measures to be implemented to minimise etc impacts of the Project; and
- General construction impacts – the management framework for the detours as a separate entity to the GreenWay is not addressed.

Chapter 8 - Sustainable development

The chapter, as prepared by Parsons Brinckerhoff, identifies the potential sustainability impact of the project. Sustainability is generally defined as development that meets the needs of the present without compromising the needs of future generations.

The sustainability principle relevant to the GreenWay and detour residents is community benefit. Table 8.1 identifies initiatives for the implementation of this principle, the key objectives being:

- improving visual amenity;
- providing for community safety (crime prevention);
- community engagement; and
- provision of good connections for pedestrians and cyclists

This chapter is brief and offers very few specific details on the GreenWay proposal (detour or otherwise). The suggested sustainability initiatives that respond to the above key objectives are high level statements.

This chapter does not respond to DGRs that are considered to be key issues for detour residents. However, we have addressed these issues in detail elsewhere.

Chapter 9 — Land use integration

This chapter, as prepared by Parsons Brinckerhoff, looks at land use and property impacts associated with construction and operation of the project.

A single site visit was undertaken to identify adjacent land uses.

As with other sections, there are internal inconsistencies in this report. On page 191, under 'residential and other sensitive land uses adjacent to the project' it acknowledges that residents will be 'potentially affected' if living adjacent to corridor and where the GreenWay is located outside the corridor i.e. where it detours.

However, it does not explain what temporary land take is required during construction of the detour (as per p.192), other than explain it will happen.

The EA maintains that it meets the DGR relating to this area within section 9.3. It initially attempts to do so on page 194, under 'amenity', where it acknowledges the visual intrusion from the new stops and the GreenWay, and refers us to Chapter 14 for more discussion. However, further reading of Chapter 14 reveals that there is no further discussion as regards to residents visually affected by the GreenWay detour, nor are any mitigation strategies recommended. It is simply left there.

Further, whilst section 9.3 acknowledges the impact of visual intrusion on residents from the light rail stops, it does not address the visual intrusion from light rail operations. Many Weston St residents have low back fences, and as the light rail slows down in particular, passengers will be afforded views into backyards. No mitigation strategies are outlined for this, and we request that some are provided for all eastern side Weston St residents. Requests of the light rail team to establish if this will happen have resulted in extremely inconsistent responses (the full gamut of 'oh yes' to 'only if the Department of Planning make us'). This is clearly of concern to those of us sacrificing privacy.

Note that section 9.3 once again repeats the misguided belief that light rail noise should be considered lower than previous freight rail noise (p.194). This would be an appropriate comparison if the freight line had been in regular use. However, it had not been used regularly for many, many years and not at all since early 2009, hence using it as a base case benchmark is entirely inappropriate, if not downright specious. The correct base case is zero — the line was not used, and all noise created by the light rail and GreenWay is an increase from zero, and thus a much larger proportionate impact.

Response to DGRs

We consider this chapter as having failed to appropriately meet the land use DGR, specifically the requirement to examine:

“The integration of light rail stops and the GreenWay with surrounding land uses and transport infrastructure and networks including:

- urban connectivity, stop accessibility and impacts on adjoining land use access ...”

Whilst it says it is addressed within section 9.3, the analysis above proves this is not the case.

Chapter 10 — Traffic and transport

This chapter, again prepared by Parsons Brinkerhoff, outlines the potential traffic and transport impacts associated with the project, including during the project’s construction and operation phases. It also sets out mitigation and management measures to minimise impacts during construction and operation.

We find this chapter particularly problematic because while it contains details of an anticipated patronage assessment for light rail users, it does not do so for the GreenWay. It does not explain why this is so. We consider this to be unacceptable — this aspect of the project consists of 20% of overall budget, yet nothing has been done to assess who may use it or how.

Failing to undertake this assessment means that it is well nigh impossible for any analysis of the full impact of the traffic or transport implications of the project.

Curiously however, TNSW did ask for feedback from the community on how they will use the GreenWay. See the extract below from a feedback form distributed at the six community sessions used to date:

Figure 1.1: Extract from TNSW survey, provided 04/09/2010 at Dulwich Hill Community Consultation

4. GreenWay, shared path corridor:

Are you supportive of the inclusion of a GreenWay - shared pedestrian and cycle path and bushcare sites in the project?

Yes No Neutral

Do you think you will use the GreenWay path for active transport, recreation etc?

Yes No Maybe

If Yes, what would you use the GreenWay for? (please tick as many boxes as apply)

Walk Cycle Become involved in bushcare

Other (please specify) _____

Do you have any other additional comments? _____

Given TNSW is obviously interested to know, we find it curious that nothing more material was undertaken.

We also believe that the RTA commissioned a patronage assessment from Bruce Ashley and question why this information was not used? Is it considered inadequate? If so, then why was not any alternative assessment undertaken?

Furthermore, the EA's assessment of the interaction of traffic and GreenWay users along the Weston St corridor is incomplete. For example, the report states on page 24 that "road safety issues include: conflict between cyclists & cars at intersections, and car doors". However, this ignores the potential for conflict between cyclists & cars *along* Weston Street.

Whilst it acknowledges risks from 'car doors' opening, it does not address the many residents who reverse their cars out over the footpath, and often down a sloping driveway. It also ignores the issue of outward-opening driveway gates that would impede footpath access and force pedestrians onto the road with cyclists and cars. If this was a typical local road with typical traffic it would not be a problem, but if the GreenWay proves popular, the risks increase exponentially.

Note that this page also records Weston Street as being 18mtrs wide, when in fact it is actually only 9 metres for its main stretch, and 12mtrs at the initial Old Canterbury Road end. This mistake appears pervasive when then used to justify the commitment to "create a buffer lane between parked cars and cycle path to prevent conflict between cyclists and car doors." We do not believe this room exists without removing parking, which TNSW is on the record as saying will not happen.

On page 26 'Parking Issues—Roads at Stops where Traffic Generation is forecast to occur', the report states that "demand for parking in this street is low". This is untrue. After 5pm weekdays, and all weekend — i.e. the leisure time we would expect the GreenWay would be most in demand, current arrangements see almost no parking available, and many park on Windsor Road or Channel St instead. Any further traffic will have a knock-on effect to these streets.

A more concerning error occurs on page 30. The report falsely states that Marrickville Council agrees Weston St is a good choice for on-street cycleway. This is incorrect — in fact, Marrickville Council has made repeated representations and submissions to Transport NSW regarding keeping the GreenWay within the dedicated Light Rail corridor. See Marrickville Council's own submission regarding the EA for further proof.

A further potential error is contained on pp 36 and 43. The report states that "... the GreenWay is not expected to generate any vehicle trips in it's own right, and so has been excluded from the analysis". However, this ignores an increasing trend in which cycle groups now 'park and ride/cycle' themselves when using popular dedicated cycleways. They will drive from all over Sydney to ride as a group to a specified location, park and then cycle. Given the GreenWay links two very popular, high-demand cycle paths, it stands to reason that different points along it may be selected as 'park and cycle' destinations, having a substantial impact on traffic in local streets.

Another concern is that the report states on page 48 of Technical Paper 1 that "... the Arlington stop was identified as a location where parking demand is high at weekends because of events at Arlington Recreation Park, and Johnson Park ...there is likely to be less demand for commuter parking at other stops on weekends, so there may be opportunities for some of the people going to the parks close to Arlington Stop to use the light rail and park their cars close to other stops". In other words, it seems there is an assumption that Arlington station commuters can be diverted to the next closest station

at Weston Street (Waratah Mills). This impact, however, is not factored into the parking demand forecasts for Weston Street, and ignores the reality outlined above of how high demand is for parking in Weston Street at present.

On page 68 'Cycle Network Improvements' in Technical Paper 1, the report requests Marrickville Council "investigate intersection treatment for on-road cycle path at Old Canterbury Rd and Weston St", and "provide a high quality road surface to clearly demarcate on-road cycle path"

This intersection is quite dangerous as it is on a blind corner and a rise. We are deeply concerned about eastbound traffic turning right into Weston Street, and northbound cyclists turning right back into the shared corridor — this simply will not see each other until it is almost too late. Late afternoon sun further exacerbates this. This is highly dangerous and has not been anticipated. We request that a strategy for managing this risk be developed if the GreenWay is not enclosed in the corridor. See Figure 1.1 below, a photograph of this intersection:

Figure 1.2: Old Canterbury Road/Weston Street intersection



Old Canterbury Road (RH turn) →

Chapter 11 — Noise and vibration assessment

This section of the EA, prepared by Heggies (as engaged by Parsons Brinkerhoff) focuses primarily on noise and vibration impacts from construction activity and operational use, but bases its assumptions on the GreenWay path being included within the light rail corridor for its duration. It does not examine the impact of having it detour to split noise between the front and back of houses, thus enveloping them.

The study states “There is no requirement to assess operational noise impacts from users of the GreenWay shared path”. We question why this was the case, when in fact the DGR relating to this section states that the analysis should be ‘including, but not limited to’ (emphasis ours) the light rail construction and operation. Arguably, given its materiality within the project, it should have been measured as an impact, as it will cause noise. This noise is further exacerbated for Weston Street residents, as it then splits into two aspects — it becomes background and foreground noise for all residents, and has particular impact for eastern side residents, as literally front and back of houses will be enveloped in new sources of noise.

Ambient noise surveys

In section 11.2, Ambient Noise Surveys, it appears that the monitoring locations chosen did include known noise locations along Weston St, such as the rail bend midway along the length of Weston St where increased friction noise between wheel and track occurs. This was apparent during the operation of the freight line, and we question why this was not re-assessed, particularly after the recent track work.

There is no recommendation addressing suppression of or minimization of wheel friction noise specifically in this location.

Yet Table 11.2 demonstrates that Weston St consistently had the lowest RBL.

Residential areas are defined as sensitive receivers. Thus, the introduction of the shared path & on-street cycle way traffic detour along Weston St would drastically alter the expected noise levels, increasing the RBL along an area classified as having sensitive receivers. Thus it could be argued that any noise will have a disproportionately large impact on Weston Street, given it will be around 60 decibels for the light rail operations alone — plus a station plus a detour.

The report states “Operational Noise Impacts of the Greenway Shared Path or on-street cycleway are not expected to be significant” yet provides no reference to determine this claim.

This statement appears erroneous as the report does not anticipate an on-street cycleway along Weston St, and therefore could only refer to other sections at the Cooks

River and Hawthorn Canal ends, areas which have consistently higher recorded RBLs and may be subject to a wider variety of road traffic and aircraft noise impacts.

Public Perception and Patronage concerns

The study also states “No noise and vibration impacts are anticipated from the operation of the GreenWay shared path” This conclusion appears to have been illogically arrived at, and does not correlate with recent precedent.

Observed usage of the Bay Run and Cooks River run demonstrate that patronage of the shared path can be expected to be high from the early morning hours and into the evening.

As was recently determined by Mosman Council, the collective sounds of early morning fitness activities have been considered an excessive noise impact in residential areas. The human voice carries, especially at that time of day when other background noise is generally not present.

A stated Social Environmental and Economic Benefit of the Greenway plan is to “provide infrastructure to promote active transport (walking and cycling)”

It also envisions “increased recreational activity infrastructure through the provision of a dedicated pedestrian and cycle shared path between Cooks River and Iron Cove. This would encourage healthier lifestyles”

These statements indicate that the NSW State Government and Local Government Areas (LGA) anticipate a growing population within the Light Rail catchment area and encourage a community benefit through patronage of the new shared pedestrian and cycle path.

Increased urban density is anticipated either side of Weston St in the near future, with multiple new residential developments proposed at both the Mungo Scott site and the Hill St site.

This indicates that this increased activity will be permanently funneled along Weston St.

As identified in the analysis of the traffic section, no forecast of expected usage or patronage has been provided.

No estimate of increased noise impact related to higher patronage has been explored.

On these matters, the report cannot comply with the DGRs.

We also note that the policies on measuring light rail were devised for the current system, which does not travel as so close to as many sensitive receivers. Arguably, this

policy was not comprehensive enough, given it could not account for the new, unique conditions under which this is being built. .

Cumulative noise impacts

DGR general requirement 3 requires the assessment of direct, indirect and cumulative impacts of the project. We are concerned that the cumulative impacts of different aspects of this project have not been assessed — instead, the report merely addresses the cumulative impact of construction of this project with other major infrastructure projects elsewhere. Nowhere within the DGR does it specify this is the only analysis it should take.

This incomplete analysis is particularly pertinent for Weston Street residents, as it is only at this part of the project that its impact significantly alters from the rest of the project as its design alters. In doing so, it generates a discrete cumulative impact. For example, at Weston Street the project forks, with the light rail continuing along the shared corridor, yet the GreenWay detours along a residential street. The project proposes that this street also contain a light rail station. The composite effect of all of this is to effectively ‘envelop’ the street within the project — it swallows it whole. Thus it is concerning that the project does not look at the unique conditions it will impose on this section alone — i.e. the noise will occur to the already-identified sensitive receivers at both the front **and** rear of their properties. We question why an analysis of what impact this will have has not been undertaken, as the fact that it will have a different kind of impact to the rest of the project is obvious to even the most unpracticed eye.

Note DGR general requirement 3 also infers the EA should look at privacy, yet it does not. See the analysis of Chapter 14 below for more details but again, given the residences noted as sensitive receivers will be within 20m proximity of this double-whammy of development, as this is within best practice guidelines for development, we question why the analysis has not taken place.

That said, adopting Proposal 1 as advocated in Part 2 of this submission will ameliorate this impact to a point, as any identifiable cumulative noise impacts on these residents can be more efficiently minimized through provision of adequate and appropriate privacy screening at the rear of these properties.

Construction impacts

With regard to construction noise, the report states that “At the Waratah Mills stop site residences and commercial receivers would generally be on grade with the stop. The NMLs are predicted to be exceeded by up to 32 dBA and 28 dBA for residences to the west and east respectively. These would be significant exceedances, as a direct result of the closeness of receivers and relatively lower ambient noise levels in the area. At commercial receivers the NML would be exceeded by up to 18 dBA”.

The report also states that “At the Davis Street bridge underpass excavation site, residences and commercial receivers are generally on grade with the works. The NMLs are predicted to be exceeded by up to 38 dBA and 34 dBA for residences to the north-east and north-west respectively. These would be significant exceedances, as a direct result of the closeness of receivers and relatively lower ambient noise levels in the area. Night-time piling works would exceed the NMLs by up to 42 dBA and 37 dBA for residential receivers to the north-east and north-west respectively.”

These observations firstly acknowledge the low ambient noise levels occurring in the areas, and secondly highlight the additional load these residents will bear throughout the construction phase, given their proximity — a proximity that is unprecedented in current light rail operations in Sydney. The prior project was not constructed so closely to as many residences.

As it highlights “the closeness of receivers and relatively lower ambient noise levels in the area”, it would therefore be reasonable to assume that operational noise from the light rail on one side of a property combined with operational noise from a shared pedestrian/cycle path at the front would have a cumulative effect on the residents.

This is of great concern to us. We also seek more details on the construction noise management plan, given it will clearly be extremely disruptive to a street that is dominated by young families.

Chapter 12 — historic heritage

We have no feedback on these items, as the project as currently outlined is not anticipated to affect historic items within our vicinity. However, we note the canal may be affected by our proposal in Part 2, but will address issues within that section.

Chapter 13 and Technical Paper 4 (Vol 2) — Ecological assessment

The ecological assessment of the GreenWay is that it provides important linkages in the landscape for flora and fauna to move around. However, what is not made clear is how this will operate with a detour at the halfway mark, as the EA does not address the detour.

Our concern is that habitat will be removed at several regenerated bush care sites in order to build the GreenWay and light rail within the corridor, e.g. the Waratah Mills stop will mean the removal of regenerated sites at Davis St, outside the Waratah Mills apartment complex itself, and near the Arlington Stop. Thus the links are already broken under this proposal.

Many residents have noted that bandicoots have visited their backyards in past years, and reported this to TNSW. We question the study's treatment of the impact of the

lightrail on this endangered species. It classes it in the significance of impacts section (13.5) as not being a major issue, yet the fauna study used is dated 2007, and site inspections occurred over 3 days on 18, 24 August and 2 September 2010 by three people. This would appear cursory, given the extent of the 5.6km extension. As an endangered species, we believe it should be given far more consideration, and the risk assessment made is inappropriate given the cursory examination of the area.

Further, we are concerned that the limitations of the survey state that the rail corridor was an active rail line at the time of the assessment which prevented night-time surveys – we note that the rail corridor was not active for goods line and only work was restricted to day work for Railcorp’s advance preparation of the site. This is contradicted by Section 4.1.1 which notes that the goods rail line is now disused.

The management of impacts section (13.4) contains a discussion of a proposed flora and fauna management plan after construction but no detail as to how this would be implemented e.g. weed control – what would be utilised and how would it be implemented? This is of concern as chemicals would have a direct impact on residences and residents, especially given the storm channel — will the chemicals be bioactive?

Overall, this inconsistency brings into question the accuracy and efficacy of the study undertaken, and we believe it requires correction to be considered reliable.

Ch 14 and Technical Paper 5 — Visual impact

This section of the report provides an overview of the anticipated visual impacts of the light rail and GreenWay during construction and operation.

Page 2 of Technical Paper 5 states that ‘...appropriate safety fencing or separation of shared path and light rail operations’ should be provided. The safety of cyclists seems to be paramount where the GreenWay forms part of the light rail corridor. However, no assessment has been done to assess the safety of cyclists or pedestrians once they are diverted onto Weston Street. This is a material gap in the analysis, as the detour is onto a working local road. Further, the location of the proposed Waratah Mills light rail stop will introduce further traffic into the area, yet no additional safety fencing, or the impact thereof, is discussed.

The report states ‘The objective of visual impact assessment is to identify scenic resources that should be protected because of their value to the community, including privacy to local residents’. However, we question whether it is possible to screen the homes along Weston Street from the visual impact of the GreenWay diversion. As discussed earlier, there has been no assessment of the numbers of likely users or the impact of this noise and traffic on residents. However, residents have been identified in the Director-General’s Requirements as relevant stakeholders, thus our concerns should

be addressed within the EA. The EA does not look beyond privacy screening along the light rail corridor — it does not analyse the visual impact of the Detour whatsoever.

We acknowledge the physical visual impact of the GreenWay detour itself down Weston Street will be minimal. However, this does not take into account its *users* i.e. people. This impact is substantial, because many homes on Weston Street have front/entry doors and living areas within close proximity to the street. There will be an exponential increase in the foot and cycle traffic passing by our doors, which materially alters the privacy and amenity of our private residences.

The report defines a “high visual effect” as one that “... would result if the development is a major element and contrasts strongly with the existing landscape. In such a situation there is little or no natural screening or integration, such as could be provided by vegetation or topography. In situations where the existing environment is heavily modified by the proposed development, for example through the large-scale removal of vegetation, a high visual effect would also result” (page 5, Technical Paper 5).

We submit that the GreenWay diversion down Weston Street meets this criterion of having a high visual effect, as topography and minimal natural screening will offer little privacy. Further, the EA does not discuss any plans to provide screening for residents. We consider that there is limited opportunity for increasing natural screening due to narrow nature strips along much of the street. It would be more effective to thus contain the GreenWay within the existing rail corridor so the planned light rail screening would also protect residents from the GreenWay (see Part 2 for more details of this).

The Visual Assessment Methodology detailed in sub-section 2.6 suggests the study should examine ‘number of viewers that will be affected by changes in their views’. However, to date the impact on residents’ views has not been undertaken. The lack of patronage forecasts for the GreenWay make it difficult to anticipate how material the impact will be; we consider this lack of forecasting to be a material weakness in the EA. Using the frequency criteria outlined in 2.6.1_Frequency, Weston Street has a ‘High Frequency’ rating. Yet the EA does not examine any mitigation strategies. We would like the project team to re-consider this.

Note that the EA also does not examine the cumulative impact of having a GreenWay detour at the front of Weston street houses and the light rail and light rail stop behind them or near them — again, this is a material flaw in the study. Arguably, Weston Street suffers the single largest impact on its visual amenity in the entire section, yet this is not addressed at all.

We base this assessment on the definition of ‘distance’ outlined in section 2.6.3_Distance. The definition of Foreground zone is that of “areas within 0-300 metres of the viewer. Within this range the observer experiences maximum discernment of landscape details, such as shape, colour and contrast”. Viewer locations that fall within

the foreground zone are considered to be in the zone of highest visual impact because the proposed development would be part of their ground views. The detour falls exactly within this range for the majority of Weston St residents.

Further, Section 3 Existing Visual Character deals specifically with what it calls the 'Weston Street on street cycle path'. It acknowledges that:

“Views from Viewpoint Views from the viewpoint are experienced by ... residents of the residential housing looking towards Weston Street. Existing vegetation provides minimal screening of views; pedestrians and motorists on Weston Street.”

So while the report acknowledges these impacts, it does not address any mitigation strategies. Inexplicably, however, in section 3.5.11, it addresses the visual impact on residents of the Waratah Mills development, and in section 5 recommends a mitigation strategy be developed for these residents. However, these residents are overwhelmingly 'raised' above the GreenWay shared corridor and GreenWay users will have little direct visual access, unlike Weston Street residents who will be at street level with the detour. Even allowing for a smaller impact on those raised above the shared path, the report still does not explain why it does not offer likewise a mitigation strategy for residents in a similar situation on Weston Street (e.g. those similarly raised or having their privacy compromised for the second story of their house as well).

We find it unacceptable that that there is no mention in the paper of any mitigation strategies for the Weston Street GreenWay. It is unjustly assumed that Weston Street residents should simply be exposed to the GreenWay/cycleway (and its users). Weston Street residents will have the highest direct impact, yet ironically there is no consideration for 'mitigation' of the impact from the GreenWay for Weston Street residents. We consider this to be the weakest section of the EA for this reason.

To date, we have received mixed messages from the project team regarding screening in particular, with the latest information provided that they will only do "what the Planning Department makes us". We therefore seek the Planning Department's assistance in specifying that these areas be addressed.

Response to DGRs

We consider this chapter as having failed to appropriately meet the visual impact DGRs, specifically the requirement to examine:

- Stop design and corridor landscaping, relationship to surrounding land uses and built form and the visual impacts of the project from surrounding areas
- Safety and security of passengers, GreenWay users and the wider community

- Privacy and amenity impacts from stops, the light rail corridor and the GreenWay.

Additionally, the EA must demonstrate that an appropriate and justified level of consultation with relevant stakeholders occurred during the preparation of the EA, including (but not limited to): the public, including adjoining and affected landowners and businesses. Again, this criterion has not been satisfied.

Ch 17-18 and Technical Paper 6 — Non-key issues — socio-economic impact

This study, prepared by Hill PDA, generally assesses the social and economic impact of the proposed light rail extension on the study area, and rates each impact on a seven point scale from significantly negative to significantly positive.

However, yet again, very little of the study focuses on area-specific assessment of impacts (for example, road congestion will be reduced across the study area as a result of the project — however, it does not look at specific streets with new stops proposed for them).

The study also does not acknowledge any proposal for GreenWay detours and as such does not assess impacts for this component of the Project. This is a critical failing, as it is this section that examines the concept of impact on amenity, and this is a critical consideration for residents.

Interestingly, the study manages to avoid making any mention of ‘people’ whatsoever, which is quite an achievement, given it purports to examine the impact on residents of the project.

Consequently, the study does not respond to DGRs that are considered to be key issues for detour residents and end-users. A list of the relevant DGRs is below.

What the study examined

In terms of impacts relating to the GreenWay, it appears that the consultants reviewed the GreenWay Masterplan 5.1 only.

The Master Plan does not propose GreenWay detours and assumes that it will be fully contained within the existing rail corridor (and even offers solutions for narrow/constrained parts of the corridor).

Prima facie, the consultants were not cognisant of the proposed GreenWay detours at the time of this study’s preparation. This means the study is incomplete.

Public perception and concerns (7.1)

The study identifies a number of 'key social matters' raised during initial community consultation.

The general inclusion of a cycleway is identified as a concern; however, the proposed detour of the GreenWay is notably absent from the list.

This is surprising given the level of representation from detour residents. It is possible that this consultation occurred prior to the proposed alignment of the GreenWay, and its detours, being made publicly available. This would not appear in line with the process of consultation and report preparation published by TNSW on its website.

Sensitive receivers (3.3)

'Sensitive receivers' are defined as social or business groups located in the study area that have the potential to be impacted upon in some way by the project, either during construction or operation.

Impacts are measured against these 'sensitive receivers' throughout the study.

Local residents are identified as a sensitive receiver; however, this is limited to residents adjacent to the proposed corridor.

As local residents living within the GreenWay corridor ('detour residents') are not recognised as a category of sensitive receivers, the impacts of the project on this category are not assessed within the study. Again, we consider this as evidence the EA is incomplete.

Specific sections lacking impact assessment

The study focuses on impacts on properties adjacent to the rail corridor (as encompassing the GreenWay). It is considered that the following areas of the study require discussion on the impact on detour residents and end-users of the GreenWay:

- 6.2 Economic impact on property values
- 7.2 Social impact to local amenity – the impact of noise, air quality and overlooking/privacy impacts on residents adjoining the corridor. NB - Also missing from this section is a discussion on road congestion and its impact on residents during the operational phase of the project. This issue is only discussed as an economic impact on businesses.
- 7.4 Visual amenity – specifically relates to stops and their proposed integration with the surrounding areas

- 7.7 Safety and security – this is considered to be a key area that requires discussion on the impact of the detour, *inter alia*, the safety of residents, pedestrians and cyclists within an area shared by motorists.

Significance of impacts (8)

The significance of impacts is rated on a seven-point scale from significant negative (serious long term irreversible impact) to significant positive (substantial long term improvements).

Table 7 rates each impact discussed within the study – there is no item relating to the impact of the GreenWay detour.

It is considered that, given the potentially long-term impact of the GreenWay detour on residents, the rating for this component of the Project would be moderate (fixed by management actions) to significant (require major re-scope of concept, design, location etc) negative. However, further work is required to ascertain the significance of the impacts of the detour.

Response to DGRs

Where appropriate, the EA's response to the DGRs should cover the GreenWay detours.

The following DGRs are key issues for detour residents and users that are not addressed in this study:

- An assessment of key issues, in particular:
 - Potential impacts of the project at both construction and operational stages
 - Description of measures to be implemented
 - Any residual impacts
- General construction impacts
- Design, sustainability and amenity, in particular:
 - Safety and security of ... GreenWay users
 - Privacy and amenity impacts from ... the GreenWay

Chapter 18 — Environmental Risk Analysis

We note in this section that there is a reference to the safety of the shared path as being a 'B' level of risk (p. 428), yet there are no mitigation strategies required.

Further, under the socio-economic section (p.429), it mentions the visually intrusive aspects of the light rail and GreenWay, but considers them a 'C' level after mitigation (down from a 'B') — despite the fact that the report does not at any point address any visual intrusion mitigation for the Weston Street detour. We question how this can be considered effective mitigation, and argue the risk remains at a higher level as a result.

Again, it seems that the GreenWay detour has not been treated on its unique impacts relative to the rest of the GreenWay, and this has resulted in an incomplete analysis.

We consider that this therefore does not meet the DRG relating to this area that:

“Notwithstanding the above key assessment requirements, the EA must include an environmental risk analysis to identify potential environmental impacts associated with the project (construction and operation), proposed mitigation measures and potentially significant residual environmental impacts after the application of proposed mitigation measures. Where additional key environmental impacts are identified through this environmental risk analysis, an appropriately detailed impact assessment of this additional environmental impact must be included in the EA.”

Chapter 19 — Statement of Commitments

We have several comments to make on this section.

Reference 4 refers to a community/stakeholder forum — we seek to have a representative of our residents appointed to this forum, given our unique status as the only street 'enveloped' in the proposal, and the only residential street with a GreenWay detour, light rail stop and light rail operations all impacting upon it.

Reference 7 refers to traffic — we believe, as stated above, that the RTA assessment of GreenWay patronage should be used when assessing impacts so more informed decisions can be made regarding impact mitigation. At the very least, Weston Street residents would like to know what they're up for. If this report is considered inadequate, then alternative research must be undertaken.

Reference 24 speaks only of the Greenway shared path, not the detour, when it mentions “where the GreenWay shared path is located close to residential dwellings, provisions for the creation or retention of privacy for those residents” — what about the residents affected by the detour?

Finally, there is no reference to security measures for GreenWay detour residents during operation.

Response to DGRs

Overall, we believe this means this section inadequately addresses the pertinent DGR, namely that:

A draft statement of commitments incorporating or otherwise capturing measures to avoid, minimise, manage, mitigate, offset and/or monitor impacts identified in the impact assessment sections of the EA. The statement of commitments must clearly articulate the desired environmental outcome of the commitment. The statement of commitments must be achievable, measurable (with respect to compliance), and time-specific, where relevant.

Part 2: Inclusion the GreenWay within the light rail corridor at Weston Street

At present, TNSW proposes to divert the GreenWay out of the light rail corridor between Old Canterbury Road and Davis Street. The diversion involves diverting pedestrians and cyclists along the entire length of Weston Street, and occurs at the approximate half way mark of the GreenWay.

As shown in Part 1 of this submission, the EA fails to:

1. Predict usage of the GreenWay;
2. Examine alternatives to the Weston Street diversion;
3. Address safety concerns that arise from the failure by TNSW to provide GreenWay users with a dedicated, safe, continuous path that is not shared by motor vehicles;
4. Address the noise, privacy and visual amenity impacts of the GreenWay on residents both on and adjacent to the GreenWay corridor, in particular where the GreenWay is diverted along suburban streets;
5. Examine the impact of the GreenWay on resident on-street parking.

Each of these failings has been discussed in the preceding section (Part 1) and will not be repeated here.

However, we consider the most critical omission of the EA is that it does not assess the cumulative impact of operation of the light rail, the Waratah Mills light rail stop, and the detour of the GreenWay along Weston Street. It is hard to quantify this impact, given the EA has not provided any data on GreenWay usage and anticipated noise, privacy and security impacts.

What we do know is that the Waratah Mills light rail stop will introduce a significant increase in the number of pedestrians, cyclists and motorists using the cul-de-sac portion of Weston Street in order to access the light rail stop. TNSW has projected the use of the stop to be in excess of 200 commuters per weekday (TNSW Environmental Assessment, page 201). At the present time, this portion of Weston Street is exposed to very little pedestrian, cyclist or motorist traffic.

We also know the noise from the light rail operation itself will average around 60 decibels.

Further, the detour of the GreenWay into Weston Street will introduce an additional significant increase in the number of pedestrians and cyclists using the cul-de-sac portion of Weston Street.

These three aspects combine to create a concentrated area of activity in the cul-de-sac portion of Weston Street – pedestrian, cycling, vehicular – thereby rendering the area unsafe for commuters, GreenWay users and local residents. These safety issues **have not been addressed** by TNSW in their Environmental Assessment.

However, this cumulative impact can be ameliorated by:

1. Not detouring the GreenWay down the length of Weston Street but instead keeping the GreenWay shared path within the light rail corridor (discussed in this section);
2. Consolidating the Waratah Mills and Arlington light rail stops as discussed in Part 3 following, or redesigning the Waratah Mills light rail stop.

One of the key issues of the Director General's Requirements (DGR) is that TNSW provide a 'project justification' as follows:

“Project Justification – identify alternatives to the preferred project considered, and justify the project taking into consideration the objects of the *Environmental Planning and Assessment Act 1979*”.

We note that including the GreenWay within the light rail corridor at Weston Street has been identified by TNSW as an alternative, and is under investigation (Chapter 6, p. 121). To date, we have been advised by the project team of five key areas that could prevent it happening. These are:

1. Impact on private property bordering the shared corridor
2. Impact on habitat and fauna
3. Impact on Hawthorne Canal
4. The path would need to narrow at certain sections because of space constraints
5. Steep topography

As these are the only five issues we are aware of, we will address these in this section. We will also compare the impact of including the GreenWay within the corridor against the impact of detouring it, to identify which is more effective in addressing overall impacts of either approach.

Proposal 1 (preferred)

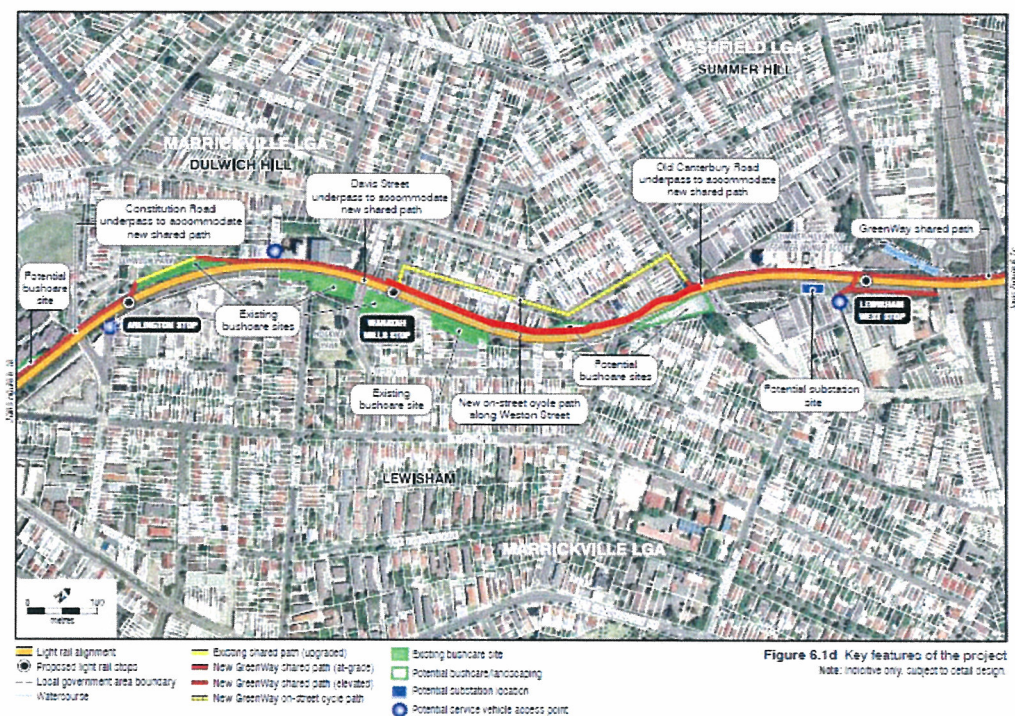
Proposal 1 is that the GreenWay be included within the light rail corridor for the length of Weston Street, rather than being detoured along it.

We propose this because we believe it will significantly increase local resident, pedestrian and cyclist safety in Weston Street by minimising congestion, particularly in the cul-de-sac portion of Weston Street at the northern end and the cul-de-sac portion of Old Canterbury Road at the southern end (entry and exit of the detour).

Location

Looking at the map below, the GreenWay would continue as it currently is until Weston Street (i.e. red unbroken line), instead of detouring as presently recommended (yellow unbroken line).

Figure 2.1: Keeping the GreenWay within the shared corridor



Access

Access to this section could still occur from Weston Street as shown above. However, we think Davis Street cul de sac should not have access, as there will be too much damage to the bush care regeneration site. Note that this is predicated on the assumption that the Waratah Mills and Arlington stops are merged, as per Part 3 of this submission.

As this would be a continuation of the existing light rail corridor, all other access points would remain.

Impact on private property

We note that TNSW has spoken of ‘many residents’ being concerned about the impact on privacy as a result of having the GreenWay in the light rail corridor (our records indicate there are only two). One resident was informed that “people would be able to see into [her] backyard” and she opposed the light rail corridor approach for this reason.

Given the sightlines displayed in the diagram below, we question why it was not mentioned that the light rail operation has a similar impact. Further, it seems clear that this can be easily rectified, yet this advice was not provided either.

Figure 2.2: GreenWay cross-section showing Alternative 1

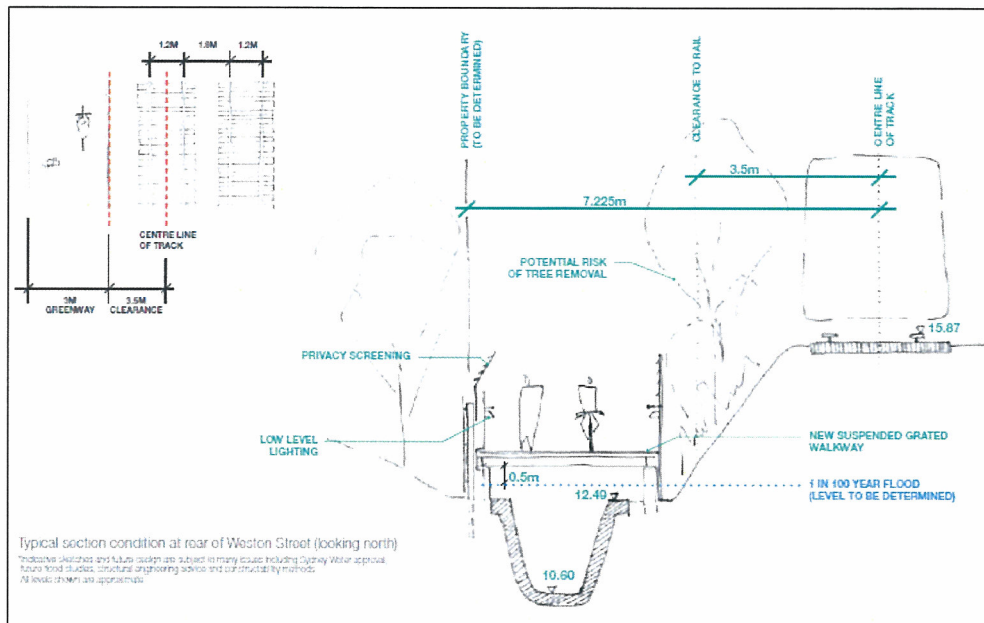


Figure 6.33 Indicative section of Greenway shared path at rear of Weston Street (alternative scheme 1)
Note: Indicative only, subject to detail design.

(Source: Chapter 6 of EA, TNSW)

We also note that having the GreenWay detour down Weston Street has a stronger impact on even more residents, yet this impact is not addressed even once in the EA.

Further, we believe that the impact of having it in the light rail corridor is far more easily ameliorated than having it detour down the front of those same houses. Screening vegetation, in addition to the safety screen built on the GreenWay, should be able to protect residents and provide a level of safety/security as well (which was the other resident’s concern). TNSW would also be able to raise the fences of residents affected

to provide further security and privacy impact mitigation. It has not offered to do this (and probably cannot) if the GreenWay is detoured down Weston Street.

TNSW has also advised some residents at 'pinch points' along the light rail corridor (where it narrows) that they (TNSW) may need to access some of their land in order to pour the foundations required to build the shared GreenWay path within the light rail corridor.

We note that the residents who are members of BLR have fully agreed to allow this access, and some have even offered to sell any land required to TNSW if it assists this construction. They feel sufficiently strongly that it is the lesser evil than having the GreenWay detour at the front of their homes.

Impact on habitat and fauna

TNSW has advised residents that building the GreenWay within the light rail corridor would have an impact on habitat and fauna. TNSW has not quantified this impact.

We acknowledge the potential for an impact, but believe it would be best mitigated by adopting the proposal set out in Part 3 of this submission. By merging the two nearest light rail stops, in fact the overall loss to bush care sites and thus habitat would be decreased. As this report details, the diagrams provided by TNSW to date underestimate the amount of bush care that would be lost by building the Arlington stop.

Most of the vegetation along Weston Street is exotic, and we note that the GreenWay Steering Group has recommended its gradual replacement. Given this is occurring anyway, we question why it could not be included within any plan to build the GreenWay within the light rail corridor.

Further, Weston Street residents who plan to build tree or shrub-based privacy screening are keen to do so with the assistance of bush care experts who could provide advice on how plantings could assist native fauna.

Note also that there are no bush care sites along Weston Street at present that would be affected by including the GreenWay in the light rail corridor.

We note that lighting along the rest of the shared corridor is assessed as having minimal impact on fauna by the EA and anticipate this will continue for this section.

Finally, we note that the EA mentions an upgrade of the pedestrian footpath on Weston Street, but does not mention if this would require the removal of extensive native plantings many residents have undertaken on nature strips. Should these be removed, this would contribute to the overall loss of flora.

Impact on Hawthorne Canal

TNSW has advised that geotechnical studies would need to be carried out to establish whether the Hawthorne Canal structure would be able to withstand the construction of a mesh path across it.

We note that extensive geotech investigations are being done in any event (p. 382, non-key issues) and consider this not to be a material consideration. We also note that the Canal was built from 1890, some 26 years before the freight line was built. It withstood this construction, which was far more invasive — it would then follow logically that it can probably cope with having a relatively lightweight mesh path built over it.

We also note that TNSW has stated that Sydney Water have concerns regarding the construction, and would need access. We consider that this could be resolved through design issues. We note TNSW has only met with Sydney Water once to date (24 August) and would expect further meetings could resolve any outstanding concerns.

We acknowledge that the GreenWay would need to narrow at certain points because of space constraints. However, we consider this to still be an advantage over the detour, because whereas the detour will be regularly impeded by day-to-day street activity (garbage bins, driveway gates, general garbage, delivery trucks, etc.), a GreenWay within the light rail corridor will not. Even at its narrowest point, the GreenWay will at least be predictable and users can plan accordingly for that narrowing, unlike a street-based detour.

Further, we note that young or novice cyclists are likely to use the footpath in Weston Street — even at its broadest, we note it is unlikely to be any wider than the narrowest section of the GreenWay.

Steep topography

This rationale was only provided recently in an article in the Inner West Courier on 4/11/10 entitled 'Detour 'ruins' GreenWay'. This is the first we have been advised of this consideration. However, this appears to contradict the assessment of Chapter 6 of the EA, which says that 'the topography of the site is generally flat' (p. 95). We would require further details of this claim.

Other advantages of enclosing the GreenWay within the light rail corridor can be summarised as follows:

- Less wear and tear on streetscape.
- Given no patronage forecasts have been made, and once it's built it's hard to change, it is better to more thoroughly investigate our Proposal 1 up front.

- The Project team themselves have said that keeping the GreenWay enclosed within the light rail corridor is feasible.
- Residents are willing to cooperate.

Summary

We can compare the two approaches by looking at the considerations raised in Parts 1 and 2 of this report.

Impact	Detour	Alternative 1 (in shared corridor)
Impact on private property bordering the shared corridor	High	Medium
Impact on habitat and fauna	Medium	Medium
Impact on Hawthorne Canal	Nil	Low
The path would need to narrow at certain sections because of space constraints	High	Medium
Steep topography	Nil	Nil
Impact on privacy	High	Low (can be mitigated)
Impact on noise enveloping effect	High	Low (can be mitigated)
Impact on safety of GreenWay users and residents	High	Low

Impact on amenity of residents	High	Medium
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Proposal 2

Another solution could be found via a 'noise-sharing arrangement', whereby the existing Victoria St cyclepath was upgraded. While this would mean the GreenWay would deviate from the western side of the corridor for a section, it would require much less construction.

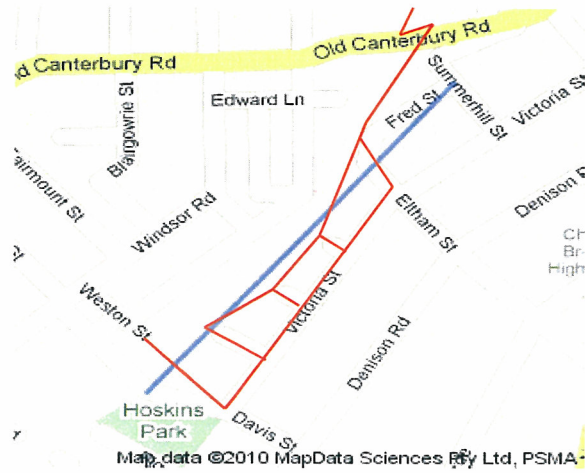
The purpose of this noise-sharing arrangement would mean that Weston Street residents are no longer 'enveloped' in the project, but rather have some of the unknown total levels of noise arising from the project ameliorated by diffusing it to another road. Basically, we would not longer bear the brunt.

There is the potential to divert the Greenway over the Old Canterbury Rd rail bridge on the northern side, then loop back under Old Canterbury Rd through a tunnel. From here there are many options on the eastern side of the light rail corridor – there are exit points for the GreenWay to link onto Victoria St at Fred St, Short St, Little St, Nelson St. Victoria Street links to Davis Street where the GreenWay would rejoin with the proposed path by crossing over the existing bridge. These exit points have been identified as we are unsure where the 'pinch-points' are that are stopping the GreenWay from fitting into the existing light rail corridor as this alternative current detour was not examined thoroughly in the EA.

All these exit points would lead to the GreenWay being diverted down a shorter distance of residential streets decreasing the impact on residents and increasing safety. Victoria Street is equally as wide as Weston Street and is already a designated cycleway, which supports its credentials as an alternative. Davis Street overpass is also an existing cycleway, which gives further weight to the argument that this must be considered as a viable alternative. Victoria Street also has existing 'safety humps' in place to increase safety by slowing traffic.

With this alternative there are no GreenWay road crossings and no GreenWay crossings at the rail level making this a safe and viable alternative. Furthermore, fewer Victoria Street residents back directly onto the rail corridor than in Weston Street, so they will only be affected by the Greenway and not by the visual and noise implications from the light rail.

Figure 2.3: Proposal 2 access routes



Red lines show multiple Greenway alternative routes

Figure 2.4 and 2.5: Victoria St/Davis St overbridge cycle way



Existing Victoria St Cycleway



Existing Davis St Cycleway

Part 3: The number and location of light rail stops

The Sydney Light Rail Inner West Extension as proposed by Transport NSW (TNSW) has a dense concentration of light rail stops between Lewisham West and Dulwich Hill Interchange.

This results in a significant and extensive overlap between the walk up catchment areas of the following stops:

- Lewisham West
- Waratah Mills
- Arlington
- Dulwich Grove
- Dulwich Hill Interchange.

This is clear when examining Figure 3.1 below (*Source: TNSW Product Definition Report, July 2010, p. 43*).

One of the key issues of the Director General's Requirements (DGR) is that TNSW provide a 'project justification' as follows:

"Project Justification – identify alternatives to the preferred project considered, and justify the project taking into consideration the objects of the *Environmental Planning and Assessment Act 1979*".

This alternative was presented to Marrickville Council at a 'Land Use, Assets and Corporate Committee Meeting' on 10 August 2010 (TNSW representatives Tim Parker and Deborah Palmer were present at this meeting) and to TNSW via email on 17 August 2010.

However, this alternative has not been pursued, and this lack of investigation has been attributed to "lack of resident feedback", although none was formally sought. We believe that TNSW has therefore failed to satisfy this DRG by not properly considering or assessing the alternative light rail stop proposed by the BLR.

Proposal 1: Merging Waratah and Arlington stops (preferred)

We propose that the Waratah Mills and Arlington stops are consolidated into one light rail stop. For ease of understanding, we will refer to this stop as 'Arlington B', as the stop will perform a role and function similar to the Arlington stop presently proposed by TNSW.

Location of the proposed stop, Arlington B

Arlington B would be located approximately 150m south of the current Waratah Mills stop, locating it between Terry Road and Hill Street in Dulwich Hill.

At present, the Arlington and Waratah Mills stops are 350m apart, therefore, Arlington B would be located approximately 200m north of the Arlington stop.

Figure 3.2: Proposed location of Arlington B



Name of the proposed stop

We propose retaining the Arlington name due to its strategic location. However, alternatives could include:

- Johnson Park
- Grove Street (or whatever the Grove Street redevelopment may be named – though the next stop south has been named Dulwich Grove so to avoid confusion it may be preferable to not have the word ‘Grove’ in two adjacent stops).

Access to the proposed stop

Arlington B would provide up to four (4) at-grade pedestrian and cycle access points as follows:

On the western side

1) Terry Road

- this access point would service commuters from the north and north-west
- commuters could also access Terry Road through the Waratah Mills residential development, which, owing to its design, would not disturb any residents within the development

2) Johnson Park

- this access point would service commuters from the south and south-west

On the eastern side

3) Hill Street

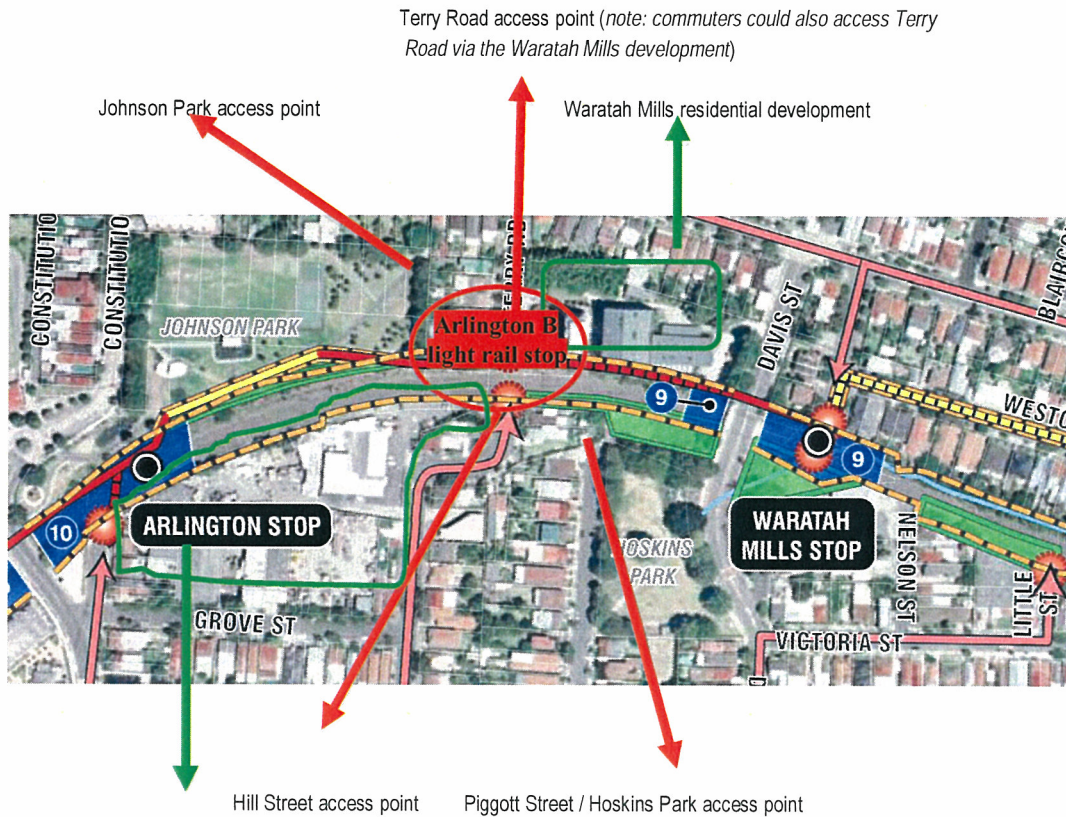
- this access point would service commuters from the south and south-east
- the Hill Street access point could be closed once the Grove Street redevelopment is completed, thereby minimising the impact of the stop on Hill Street residents. Commuters could then be led to the Arlington B stop through the Grove Street redevelopment (mix of commercial and residential development), which could incorporate access to Arlington B into its design. This could facilitate access to Arlington B by providing a more direct walking/cycling route for commuters
- if necessary, the Grove Street redevelopment could also potentially provide an opportunity for the incorporation of commuter parking into its design.

4) Piggott Street / Hoskins Park

- this access point would service commuters from the north and north-east
- it is acknowledged that in order to access Arlington B a walkway will need to be erected within an existing bush care site (Hoskins Park bush care site). However, TNSW is proposing a similar walkway be erected in any event within the existing Davis Street bush care site so that commuters can access TNSW's proposed Waratah Mills light rail stop via Davis Street (TNSW Environmental Assessment, p. 95). We do not prefer this access point, given the net loss, but note it would be more direct than the Davis St site (i.e. less bush care loss overall, although this is small).

Each of these access points is shown on the diagram below, together with the location of the current Arlington and Waratah Mills stops as proposed by TNSW. The red oval indicates the location of Arlington B, consolidating the Waratah Mills and Arlington stops.

Figure 3.3: Access points for Arlington B



Additionally, GreenWay access points could be strategically placed along the route to facilitate access to Arlington B. For example, a GreenWay access point could be placed at Weston Street to provide direct access to the stop for residents nearby.

Background information on the Grove Street Development

In 2007, Marrickville Council adopted the *Marrickville Urban Strategy* ('the Urban Strategy') (available at: <http://www.marrickville.nsw.gov.au/council/plans/marrickvilleurbanstrategy.htm>). The Urban Strategy was developed to provide the planning context for future development across the Marrickville local government area. It establishes a vision and co-ordinated directions addressing a range of planning, community and environmental issues, to guide short, medium and long term strategic planning policies.

In summary, the Urban Strategy suggests (at page 21) that Marrickville Council should plan for 3,830 dwellings over 25 years, through a mix of renewal approaches, to provide:

- rezoning and development controls to provide for 2,530 dwellings in the first 10 years;

- an additional 1,300 dwellings in 10 to 25 years; and
- 80 percent of new dwellings being located in or near centres, in walking distance to shops and services close to public transport.

One of the renewal approaches is (at page 18) to “rezone selected industrial sites to cater for residential housing demand, address local amenity and provide space for community facilities.” Example of such sites given in the Urban Strategy include McGill Street (site of the Lewisham West light rail stop) and Grove Street (site of the Arlington B light rail stop).

The BLR believes that Arlington B’s stop location will more appropriately service these future needs by maximising patronage in the future at a reduced cost today, due to the significant savings which would be realised as a result of consolidating two stops into one.

The *Marrickville Village Centres Urban Design Study* (available at: <http://www.marrickville.nsw.gov.au/planninganddevelopment/planningreview.htm>) shows that the proposed Grove Street development will encompass all of the area between Grove Street, Hill Street and the light rail corridor (as per the aerial photographs below). This area will be used for both residential and commercial purposes.

Figure 3.4: Arlington B light rail stop viz. Grove St masterplan

Location of Arlington B light rail stop



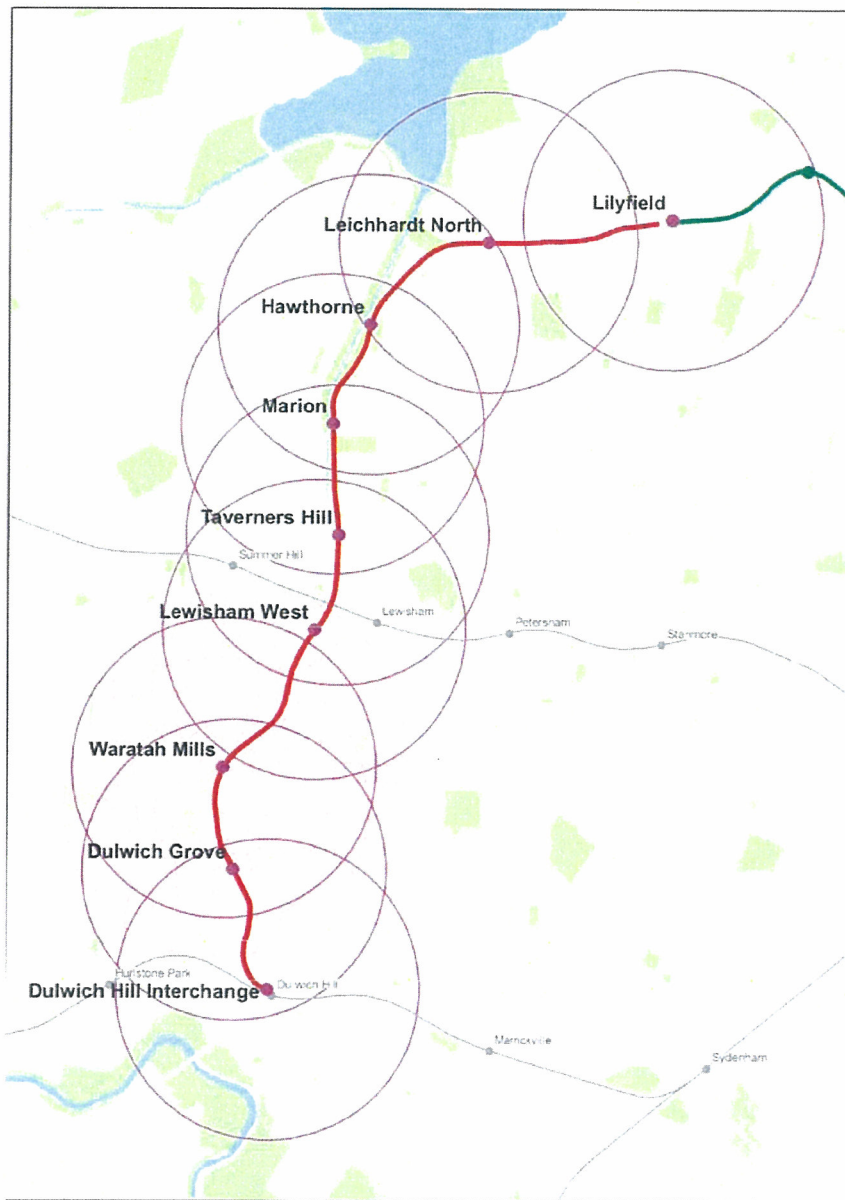
Location of Arlington light rail stop

up catchment for these two stops is shown in the pink circular shaded areas.

The diagram below demonstrates that consolidating the Arlington and Waratah Mills stops into one Arlington B stop will have a negligible impact on walk-up catchment.

Further, we would suggest that TNSW consider buying back the easement access that allows Williams Pde residents to easily access the Dulwich Grove stop, rather than having to 'go around' to access Arlington. We understand this was only recently sold to a developer for privacy purposes, but buying it back would make life a great deal easier for these residents.

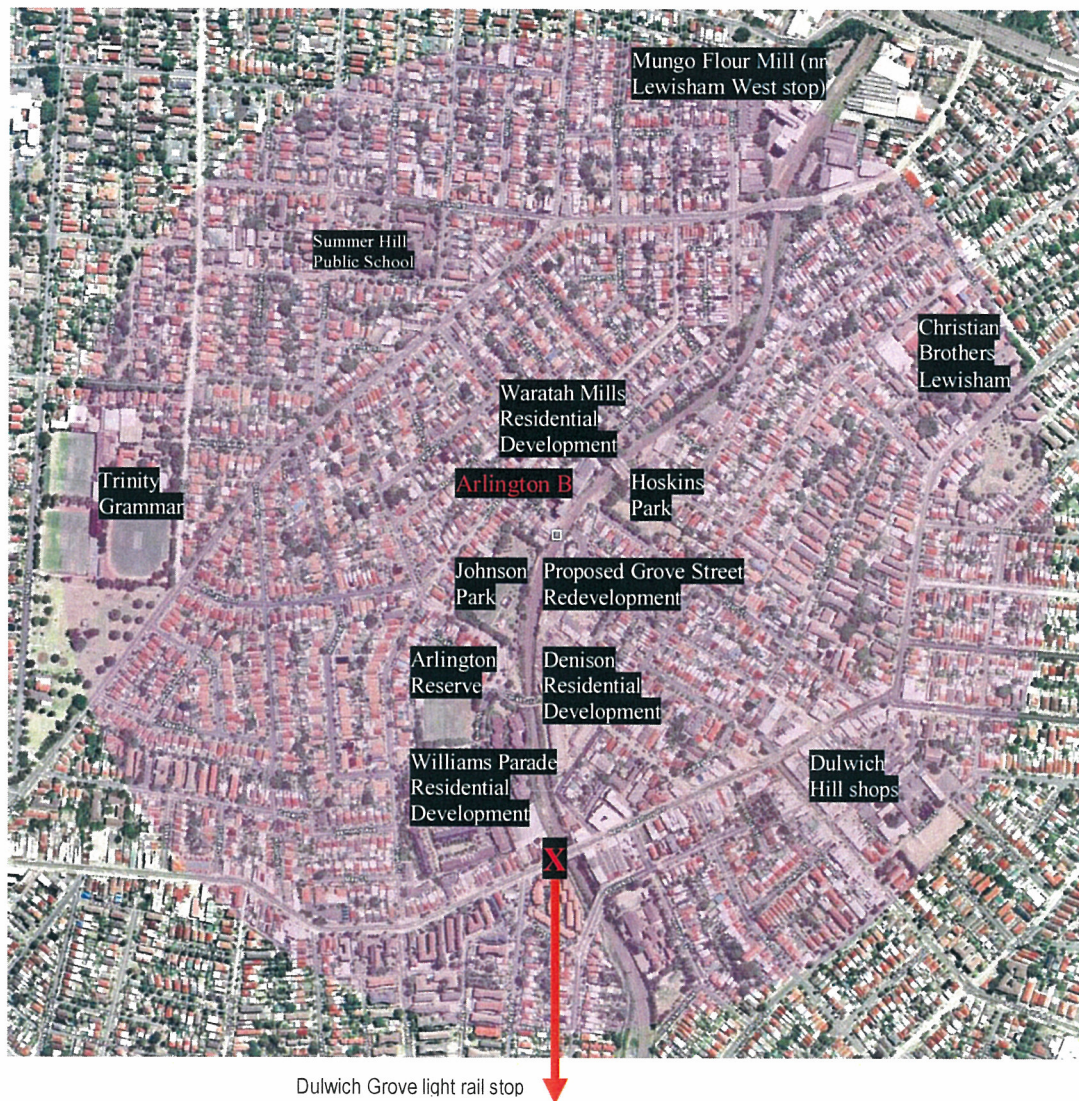
Figure 3.6: Light rail catchment areas with Arlington B only



The aerial photograph below shows places of interest and sources of patronage that will remain within the light rail catchment as well as the location and, therefore the proximity, of the Dulwich Grove and Lewisham West light rail stops, which will be respectively south and north of Arlington B.

In summary, Arlington B will continue to provide excellent commuter access whilst simultaneously improving overall light rail operating speeds and efficiency.

Figure 3.7: Arlington B patronage sources



Comparison of stop criteria

The TNSW *Environmental Assessment* lists a number of criteria which it states were considered in the determination of stop locations.

Page 52 of the *Environmental Assessment* states:

“Each of these locations was assessed against a set of criteria (GHD 2010b), which included the following:

- stop locations relative to stops identified in the *Metropolitan Transport Plan* (proximity, relative benefits, etc.)
- potential role and function of the stop (origin, destination)
- potential walk-up catchment of the stop
- ease of access to the stop location by mode (pedestrians, cars — such as kiss-and-ride or park-and-ride — bus, train, cyclists, etc.)
- access to modal interchange/transfers (such as to/from bus or heavy rail services)
- compatibility and potential for integration with the GreenWay shared path
- environmental constraints
- constructability (time to construct, potential cost, requirements for earthworks, etc.)
- potential for local urban renewal opportunities and land use changes (such as the Summer Hill Mills site (former Mungo Scott Mills))
- the distance between potential stop locations
- potential patronage in relation to existing and projected population and employment localities (such as Parramatta Road, which is identified in the draft Inner West Sub-regional strategy).”

These criteria are examined below.

1) *Stop locations relative to stops identified in the Metropolitan Transport Plan (proximity, relative benefits, etc.)*

The NSW Metropolitan Transport Plan 2010 lists ‘Waratah’ and ‘Constitution Road’ as potential “new stations” in an “indicative light rail extension proposal” (p. 32-33). The Metropolitan Transport Plan 2010 provides **no details** about where the stops will be located, their proximity, their relative benefits or any other relevant information, therefore does not dictate where those locations must be.

2) *Potential role and function of the stop (origin, destination)*

The Waratah Mills stop as proposed by TNSW serves no unique function as an origin or destination.

As an origin, the only high density housing within vicinity of the proposed Waratah Mills stop is the Waratah Mills residential development, which will in any event be better served by Arlington B. The vast majority of residences within vicinity of the Waratah Mills stop are low-density single dwellings. Thus fewer residents are served by it.

As a destination, the closest recreational facility is Hoskins Park, which is also better served by the Arlington B light rail stop.

All other recreational facilities including Arlington Reserve and Johnson Park are better accessed by TNSW's proposed Arlington stop than the proposed Waratah Mills stop, so the Arlington stop would be preferred by catchment commuters. Likewise, Dulwich Hill shops, Trinity Grammar, the Williams Parade residential development, the Denison residential development and the proposed Grove Street redevelopment are better accessed by Arlington than Waratah Mills.

The Arlington B light rail stop, due to its four access points, is within an easy walk of Arlington Reserve, Johnson Park, Hoskins Park, Waratah Mills residential development, Denison residential development, Williams Parade residential development, the proposed Grove Street residential development, Sideways Cafe, Dulwich Hill shops and Trinity Grammar School.

Therefore, in terms of role and function Arlington B is far superior to the Waratah Mills stop proposed by TNSW, whilst still performing all of the same role and functions of TNSW's proposed Arlington stop.

3) *Potential walk-up catchment of the stop*

As already discussed above, the walk up catchments of the proposed Waratah Mills and Arlington stops heavily overlap each other and those of the walk-up catchments of the Lewisham West and Dulwich Grove light rail stops. This dense overlap is unnecessary and an inefficient use of resources and taxpayer funds.

The area surrounding the Waratah Mills stop is predominantly low-density private residences, with a small amount of medium density housing.

The area surrounding the Arlington stop is more heavily populated with medium- to high-density housing, with more planned in the Grove Street re-development.

The area surrounding the Arlington B stop is populated by both medium- to high-density housing (predominantly to the south) and by lower density housing (predominantly to the north).

Again, as already discussed above, the consolidation of the Arlington and Waratah Mills stops into one Arlington B stop has a negligible impact on stop walk-up catchment.

- 4) *Ease of access to the stop location by mode (pedestrians, cars — such as kiss-and-ride or park-and-ride — bus, train, cyclists, etc.)*

The three stops (Waratah Mills, Arlington and Arlington B) are well accessible by pedestrians, cars and cyclists; however, Arlington B offers superior and multi-directional pedestrian and cycling access.

Note that by dint of its location effectively at the end of Johnson Park, it retains its attractiveness to Abergeldie Estae residents, i.e. they can still access it via the GreenWay shared path through Johnson Park — it is merely a matter of their walking an additional 200m. This is a reasonable compromise.

- 5) *Access to modal interchange/transfers (such as to/from bus or heavy rail services)*

None of the three stops (Waratah Mills, Arlington and Arlington B) offer an easy or convenient link with other modes of public transport (bus, heavy rail).

- 6) *Compatibility and potential for integration with the GreenWay shared path*

Arlington and Arlington B are equally compatible with the GreenWay shared path and have the same potential for integration with the GreenWay shared path.

In relation to Waratah Mills, TNSW proposes to detour the GreenWay shared path out of the light rail corridor and into Weston Street at the Waratah Mills light rail stop. BLR believes that this proposal renders the GreenWay **incompatible** with the location of the Waratah Mills stop, **significantly reducing** the potential to integrate light rail with the GreenWay shared path.

Figure 3.8: Incompatibility with Greenway

Area of concern



The area located within the red circle in the diagram above poses significant safety concerns. A similar concern arises at the other end of Weston Street near Old Canterbury Road.

The introduction of both a light rail stop (Waratah Mills) and the detour of the GreenWay outside of the light rail corridor as proposed by TNSW will render this area, in the cul-de-sac portion of Weston Street, unsafe. These safety issues arise as a result of the following:

- the Waratah Mills light rail stop will introduce a significant increase in the number of pedestrians, cyclists and motorists using this cul-de-sac portion of Weston Street in order to access the light rail stop. TNSW has projected the patronage of the stop to be in excess of 200 commuters per weekday (TNSW Environmental Assessment, page 201). At the present time, this portion of Weston Street is exposed to very little pedestrian, cyclist or motorist traffic.
- the detour of the GreenWay into Weston Street will introduce a further significant increase in the number of pedestrians and cyclists using this cul-de-sac portion of Weston Street.

These two combine to create a concentrated area of activity in the cul-de-sac portion of Weston Street – pedestrian, cycling, vehicular – thereby rendering the area unsafe. These safety issues **have not been addressed** by TNSW in its Environmental Assessment.

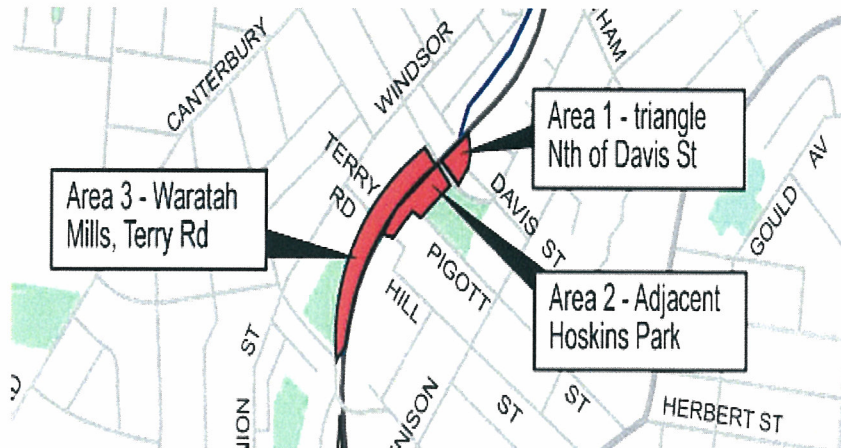
Therefore, the Waratah Mills light rail stop and the GreenWay detour are incompatible and do not serve to integrate the light rail with the GreenWay.

7) *Environmental constraints*

There are three existing bush care sites in the area in question, as follows:

1. Davis Street bush care (Area 1)
2. Hoskins Park bush care (Area 2)
3. Waratah Mills bush care (Area 3)

Figure 3.9: existing bush care sites



(Source: http://www.iweg.org.au/Resources/Maps%26Videos/IWEGWorkSites_ALL.jpg)

The Waratah Mills light rail stop as proposed by TNSW will affect the Davis Street bush care site.

The Arlington light rail stop as proposed by TNSW will affect the Waratah Mills bush care site.

The Arlington B light rail stop as proposed by BRL will affect the Waratah Mills and (potentially) Hoskins Park bush care sites.

Either way, it is unfortunate that two bush care sites will be affected, given the time, resources and commitment devoted to them by the Inner West Environmental Group (IWEG).

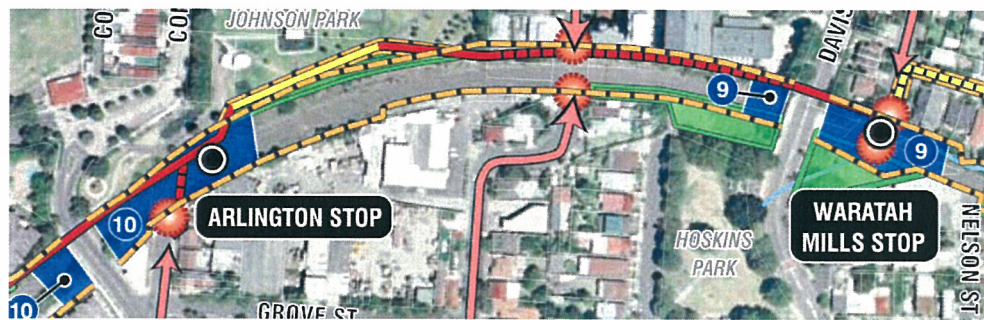
The Arlington B option, however, will have the LEAST impact on established bush care in that it will reduce the amount that will need to be destroyed due to the introduction of the Sydney Light Rail Inner West Extension. This is discussed in more detail below in our discussion of bush care.

The site map found in the TNSW *Environmental Assessment* is misleading in terms of the extent of bushcare which will be impacted by the light rail and GreenWay. The map below has been reproduced from page 207 of the *Environmental Assessment*.

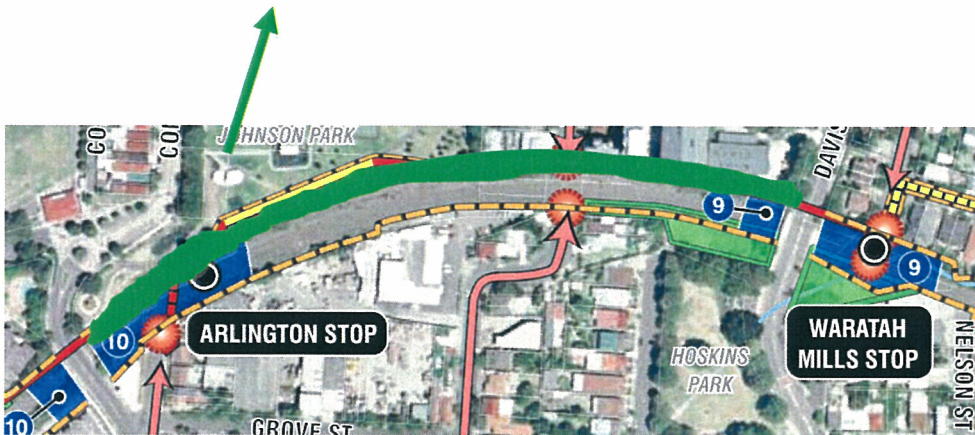
The map fails to show, however, that the Waratah Mills bush care site actually extends along the entire western border of the rail corridor between Constitution Road and Davis Street. Thus the impact of the Arlington stop on bush care is under-reported.

Figure 3.10: Arlington bush care loss

Existing bushcare site Site map as shown on page 207 of the Environmental Assessment:



Actual extent of the Waratah Mills bushcare site (green area below)



8) *Constructability (time to construct, potential cost, requirements for earthworks, etc.)*

Arlington B has ample at-grade access and requires minimal earthworks, thereby minimising construction costs and construction time, and maximising constructability. Likewise Waratah Mills.

The construction of the Arlington stop, however, is more complex and costly. Page 98 of the TNSW Environmental Assessment reveals the following about the construction of the Arlington light rail stop:

- a) widening of the existing cutting would be required. This would likely require rock-bolting or soil-nailing and stabilisation; and
- b) access to the Arlington stop would be provided via a new set of stairs and a lift.

These two aspects combine to increase the construction time and cost of the Arlington stop.

9) *Potential for local urban renewal opportunities and land use changes (such as the Summer Hill Mills site (former Mungo Scott Mills))*

The Grove Street redevelopment could result in a significant increase in light rail patronage if a light rail stop is positioned appropriately. Arlington B also has an advantage in its potential to be incorporated into the design of the Grove Street development, thereby minimising its impact on residents.

Marrickville Council does not have any plans to redevelop any sites in the immediate vicinity of the Waratah Mills stop proposed by TNSW.

10) *The distance between potential stop locations*

Central → Capital Theatre	600m
Capital Theatre → Paddys Markets	200m
Paddy's Markets → Exhibition	700m
Exhibition → Convention	300m
Convention → Pyrmont Bay	400m
Pyrmont Bay → Star City	300m

Star City → John Street Square	300m
John Street Square → Fish Market	500m
Fish Market → Wentworth Park	500m
Wentworth Park → Glebe	700m
Glebe → Jubilee Park	800m
Jubilee Park → Rozelle Bay	700m
Rozelle Bay → Lilyfield	800m
Lilyfield → Leichhardt North	980m
Leichhardt North → Hawthorne	830m
Hawthorne → Marion	600m
Marion → Taverners Hill	610m
Taverners Hill → Lewisham West	620m
Lewisham West → Arlington B	800m
Arlington B → Dulwich Grove	500m
Dulwich Grove → Dulwich Hill Interchange	660m

Average distance between stops = 590m

The table above demonstrates that a stop distance between Lewisham West and Arlington B of 800m is not excessive, but rather is comparable to the distance between other light rail stops such as Glebe to Jubilee Park, Rozelle Bay to Lilyfield, and Leichhardt North to Hawthorne.

The table shows that the light rail stops in the CBD and its immediate fringes are generally spaced closest together, and light rail stops in suburban and, therefore, primarily residential areas are generally spaced further apart.

The current proposal by TNSW is to include a Waratah Mills stop and an Arlington stop. The stop distances would be:

Lewisham West → Waratah Mills	650m
Waratah Mills → Arlington	350m
Arlington → Dulwich Grove	350m
Dulwich Grove → Dulwich Hill Interchange	660m

The TNSW Environmental Assessment, on page 95, states “The Waratah Mills stop would generally serve the north-western part of Dulwich Hill and southern part of Summer Hill, an area not currently served by public transport”. This statement is grossly incorrect.

In fact, the north-western part of Dulwich Hill and the southern part of Summer Hill are **extremely well served by public transport**. Lewisham heavy rail station is an approximate 10 minute walk, Summer Hill heavy rail station is an approximate 12 minute walk, the 413 bus is an approximate 3 minute walk, and the 445, 426 and 428 buses are an approximate 5 minute walk from the proposed Waratah Mills light rail stop.

Given the proximity to faster modes of public transport (as compared to light rail), the area does not require three light rail stops within 700m (Waratah Mills, Arlington and Dulwich Grove). A distance of 800m between the Lewisham West and Arlington B stops is both acceptable and appropriate.

11) Potential patronage in relation to existing and projected population and employment localities (such as Parramatta Road, which is identified in the draft Inner West Sub-regional strategy)”

As already stated above, the proposed redevelopment of Grove Street offers the potential for an increase in patronage of the Arlington B stop, as opposed to the current Waratah Mills stop where there is limited or no redevelopment potential and, therefore, limited potential for increased patronage.

Summary

The BLR believes the Arlington B light rail stop satisfies TNSW’s stop criteria far better than the existing proposed Waratah Mills stop (which satisfies very few of TNSW’s stop criteria), and is comparable, if not superior, to the Arlington stop.

Overall, the Arlington B stop will retain all the positives of the Arlington stop without

being encumbered by the negatives of the Waratah Mills stop.

TNSW Criteria	Waratah Mills	Arlington	Arlington B
Stop locations relative to stops	X	X	X
Potential role and function of the stop	X	√	√
Potential walk-up catchment of the	√	√	√
Ease of access to the stop location	√	√	√√
Access to modal	X	X	X
Compatibility and potential for			
Environmental constraints	X	X	X
Constructability	√	X	√
Potential for local urban renewal	X	√	√
The distance between potential stop	X	X	√
Potential patronage in relation to			

Bush care

BLR understands there are bush care implications and acknowledges the time spent by the Inner West Environment Group (IWEG) in developing and caring for the bush care sites.

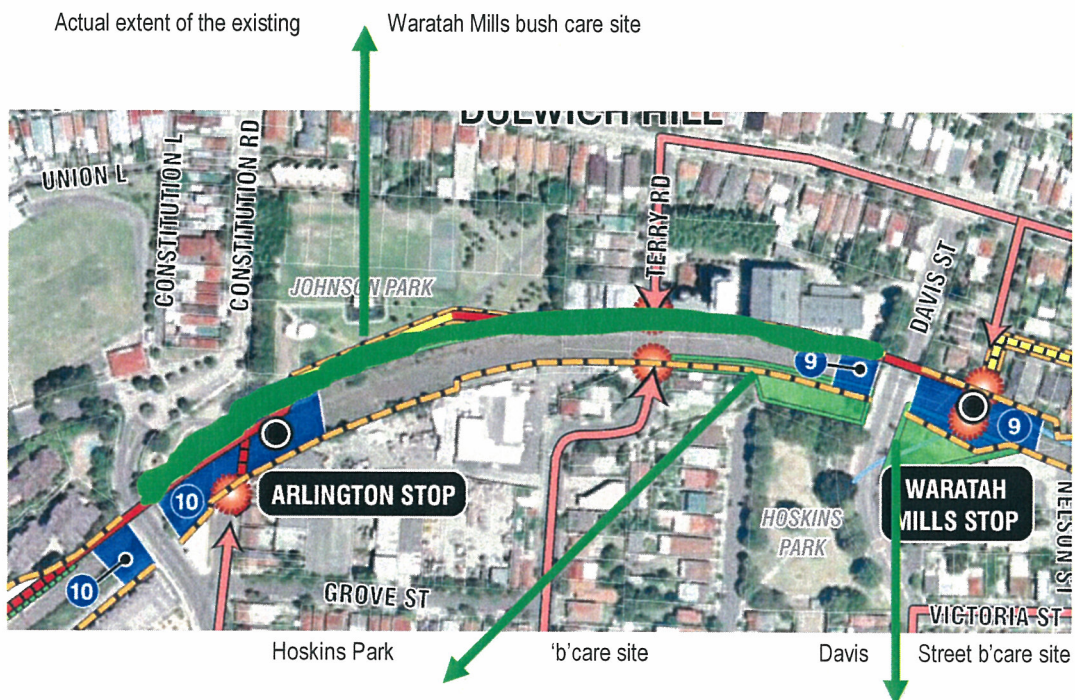
BLR also strongly supports the allocation and development of new bush care sites and the expansion of existing bush care areas sites within the GreenWay corridor.

The BLR proposal of consolidating the Waratah Mills and Arlington B stops will overall, minimise the amount of bush care that will need to be destroyed due to the introduction of the Sydney Light Rail Inner West Extension as follows:

	Waratah Mills	Davis Street	Hoskins Park
<i>TNSW proposal</i>	- Arlington stop to be	- Path to be built	- Not affected
<i>BLR proposal</i>	- Arlington B stop to	- Not affected	- Path to be built

The significant advantage of the Arlington B site is that service vehicle access to the light rail track could be achieved via the cul-de-sac portions of Weston Street and Constitution Road, which are not bush care sites. Also, Terry Road is already being used by the construction teams to access the light rail track. This area of bush care has, therefore, already been destroyed. The Arlington B stop could be constructed over this already destroyed area of bush care which will, overall, minimise further bush care destruction.

Figure 3.11: Waratah bush care loss



Noise

We note also in the Noise section of the EA that 5 and 10 Terry Road, under the present stop locations, will frequently exceed noise limits as the light rail will be travelling at top speeds. Placing the station here instead will remove that problem. That said, care will need to be taken to investigate where it may be displaced to, lest it be somewhere else even less suitable. We do not wish to simply displace problems into someone else's backyard.

Conclusion

Minimising the number of light rail stops without compromising walk-up catchment will facilitate efficient light rail operations.

The BLR believes the Arlington B stop will have the following advantages for stakeholders:

1. *NSW State Government* – Arlington B will obviate the need for both the Waratah Mills and Arlington stops, thereby saving both time and money. The Arlington B stop is also better aligned with the state government's stop criteria and will ultimately deliver the government more "bang for its buck".
2. *Marrickville Council* – Arlington B will better satisfy and service Council's long-term growth and planning objectives for the Marrickville local government area.
3. *Light rail commuters* – commuters will benefit by way of improved efficiency, time, speed, and the potential to construct commuter parking at the Grove St redevelopment (if deemed necessary), all of which may further increase patronage.
4. *Population of NSW* – will benefit through a better allocation of taxpayer funds and minimisation of wastage.
5. *Inner West Environment Group* – the Arlington B stop will minimise the overall destruction of bush care.

Note that this proposal has been endorsed by the Inner West Environment Group and the Friends of the Greenway because of its emphasis on the reduction of bush care.

Proposal 2: Re-design of the Waratah Mills stop

Should TNSW proceed with Waratah Mills in its current location (not BLR's preferred option), then some easy re-designing can at least minimise its impact more effectively than the current strategies. This redesign will be discussed below.

The design of the Waratah Mills light rail stop proposed by TNSW is detailed on page 95 of the *Environmental Assessment*. In brief, TNSW propose that the stop be accessible from the east via the cul-de-sac portion of Davis Street and from the west via the cul-de-sac portion of Weston Street. The access to/from Weston Street is proposed to be via the GreenWay shared path.

As already discussed above, this will result in a concentration of activity (pedestrian, cycling and vehicular) in the cul-de-sac portion of Weston Street. Pedestrian and cycling activity would arise as a result of local residents, commuters and GreenWay users, and vehicular activity would arise as a result of local residents, commuters adopting park-and-ride or kiss-and-ride, and potentially GreenWay users adopting park-and-cycle / park-and-walk.

Rather than concentrate activity by funneling commuters and GreenWay users into a residential area, TNSW should instead be seeking to **filter commuters away** from residential areas. This can be easily done through a redesign of the Waratah Mills light rail stop (if building of the stop proceeds).

Proposed redesign of the Waratah Mills light rail stop

Key to this proposal is that access to the Waratah Mills light rail stop must be limited to the Davis Street overbridge only (i.e. the section of Davis Street that overpasses the light rail corridor) and access to the Waratah Mills stop via the cul-de-sac portions of Davis Street and Weston Street must be abolished. This in turn will obviate the need to construct a pedestrian/cyclist pathway through the Davis Street bush care site, thereby eliminating any impact on this established bush care site.

It is also imperative that appropriate screening (for example, through planting) be used around the Davis and Weston Street cul-de-sacs to further minimise the intrusion of the Waratah Mills light rail stop on local residents.

The access redesign can be achieved by installing stairs for able-bodied persons and a lift for persons with limited mobility/parents with prams, etc. from the Davis Street overbridge down onto the Waratah Mills stop platforms. In essence, BLR proposes that access to the Waratah Mills stop should be identical to the access currently in place at the existing Lilyfield light rail stop.

The overbridge section of Davis Street is wider than Weston Street and as a throughfare

is accustomed to more vehicular, cycling and pedestrian traffic than the cul-de-sac portions of Weston Street and Davis Street. It also does not have any residences facing onto it in its immediate vicinity.

Figure 3.12: Proposed sole access to Waratah Mills light rail stop (Davis St, facing west)



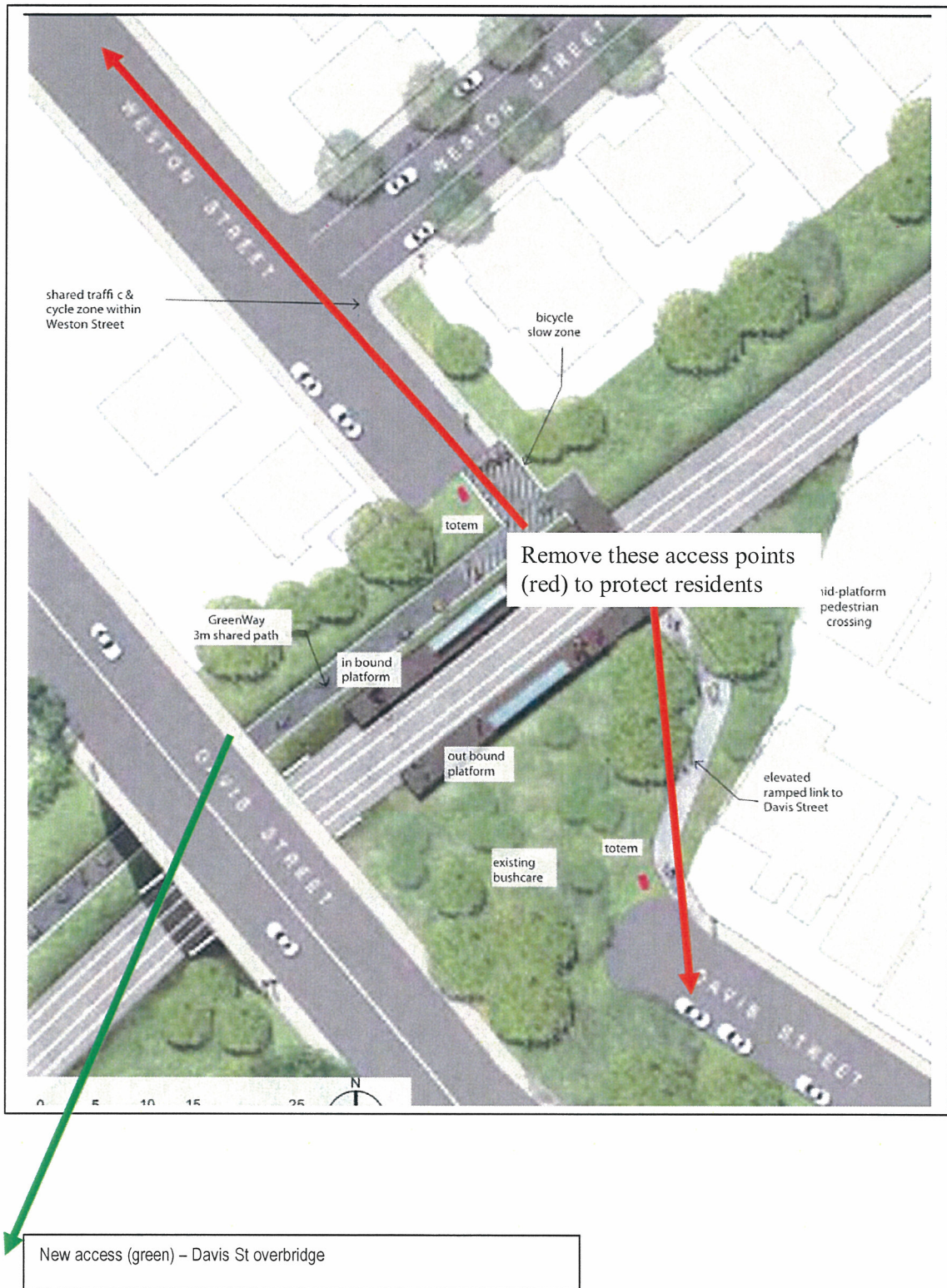
Figure 3.13: Proposed sole access to Waratah Mills (facing east)



Note that there are **no** homes facing onto either aspect of Davis Street.

We suggest moving the Weston and Davis Street cul-de-dac access points and introduce screening planting to minimize the intrusion to residents (aka 'sensitive receivers'). See figure 3.14 below for details.

Figure 3.14: removal of TNSW-proposed access points, introduction of alternative



Benefits to local residents

Homes in and around Weston Street and the cul-de-sac portion of Davis Street typically have little set-back from the road. Therefore, filtering commuters **away** from private residences will significantly benefit local residents by:

- i. reducing noise levels arising from increased pedestrian, vehicular and cycling traffic outside homes as commuters access the Waratah Mills light rail stop. Instead, commuters will be directed to the throughfare of Davis Street overbridge;
- ii. increasing the security and privacy of local residents as rather than loitering outside private residences, commuters will instead be directed to the Davis Street overbridge to wait for their friends/relatives/lift home etc;
- iii. reducing the loss of amenities to local residents such as on-street parking (discussed below);
- iv. increasing the safety of local residents due to reduced pedestrian, vehicular and cycling traffic outside their homes and reduced conflict (and potential for conflict) between residents, commuters and GreenWay users; and
- v. reducing the visual impact to local residents as their homes will no longer face (directly or indirectly) onto the entrance to the Waratah Mills light rail stop.

Benefits to commuters and GreenWay users

As already mentioned, the Davis Street overbridge has few homes facing onto it. As a result, the entrance to the Waratah Mills light rail stop (via the Davis Street overbridge) could be more brightly lit which would improve commuter safety. This could occur with minimal impact on both native fauna that currently inhabits the Davis Street bush care site and local residents.

Also, as already discussed, directing commuters to the Davis Street overbridge will minimise conflict between local residents, commuters and GreenWay users, as they will no longer be forced to compete for on-street parking, road space, footpath space, driveway access.

Parking impacts

Residential on-street parking is vital in the cul-de-sac portions of Davis Street and Weston Street due to limited residential off-street parking in and around these streets, as discussed in Part 1 of this submission. Measures should be implemented by TNSW to minimise the impact of the Waratah Mills light rail stop and the GreenWay on residential

on-street parking.

There is ample space for time-unlimited parking on Davis Street in the vicinity of the overbridge. This parking is not required by local residents. With appropriate signage, commuters who choose to park-and-ride can be encouraged to park on the Davis Street overbridge rather than taking up local resident parking.

A designated kiss-and-ride (drop off) point to increase commuter safety and a disability space can also be established on the Davis Street overbridge without sacrificing any resident parking.

TNSW's Environmental Assessment predicts that only five commuters a day will chose to park-and-ride at the Waratah Mills light rail station. BLR's view is that this figure is a gross underestimation.

TNSW's stance to ignore parking issues and underestimate the adoption of park-and-ride strategies by commuters is negligent. It demonstrates and reinforces TNSW's a lack of planning and awareness.

Conclusion

Limiting stop access to the Waratah Mill light rail stop to one point on the Davis Street overbridge will have the following advantages:

- it obviates the need to install a pedestrian pathway through the Davis Street bush care site, thereby minimising the impact of the Inner West Light Rail Extension on already established bush care sites;
- it filters commuters away from private residences, thereby reducing the noise, privacy, security, safety, loss of amenity and visual impacts on local residents within the immediate vicinity of the cul-de-sac portions of Davis Street and Weston Street;
- it will encourage commuters who choose to park-and-ride or kiss-and-ride to do so on the overbridge portion of Davis Street (which is more suited to a higher level of vehicular traffic than the cul-de-sac portions of Weston Street or Davis Street);
- it will minimise the impact of commuter parking on Weston Street and Davis Street cul-de-sac residents as there is ample parking for commuters on the overbridge section of Davis Street. This parking is not required by local residents and no private residences face onto the overbridge portion of Davis Street.

Part 4: Misinformation distributed by EcoTransit

We are aware that EcoTransit letterboxed a great deal of local residents, providing them with a diagram that purported to show that over 1200 residences would be disenfranchised should the proposal to merge Waratah and Arlington stops take place. This diagram is clearly false, as it does not demonstrate, as TNSW themselves have shown, that all of these streets would remain within the catchment areas of other stations such as Lewisham West and Dulwich Grove — see Figure 3.6 on page 41 of this report for proof of that. In fact, those stations were probably always closer to begin with.

This brochure then urges residents to make a submission based on these purported 'facts' — this is a total misrepresentation of the reality. We are deeply concerned that the amount of for/against submissions received will essentially be 'skewed' by this.

We request that this metric of for/against not be applied in this case as a decision-making tool when determining materiality; but rather the more qualitative metric of assessing the merit and substance of each submission, and whether there is veracity in the content.

Please see following a copy of this pamphlet as proof of the misrepresentation.

Light rail stop locations

An issue that affects you

This leaflet is to alert you to an important issue, of which you may not be aware, relating to the light rail extension project.

The Environmental Assessment (EA) for the project, currently on display, shows stops located just north of Constitution Road ('Arlington') and immediately north of the Davis Street bridge ('Waratah'). These planned stops are well-located and will enhance transport options for the local area.

It has come to EcoTransit's attention that a small group of residents of Weston St are lobbying to have these two stops replaced by a single stop located between Hill Street and Terry Road (see map overleaf). While this option is not explicitly canvassed in the EA, it would be open to Transport NSW to adopt it if they receive a significant number of submissions in its favour.

If the 'Arlington' and 'Waratah' stops, as shown in the EA, are adopted, the homes shown on the map overleaf will be within a convenient 400 metre walk of a light rail stop.

But if a Hill St/Terry Rd location were adopted instead, the residents in the areas indicated on the map will have much further to walk. At least 1200 residents will be disadvantaged in this way.

We believe, therefore, that residents in these areas should take the precaution of making a submission to the EA *supporting* the 'Arlington' and 'Waratah' stops as shown in the EA. You should specifically *oppose* the Hill St/Terry Rd option that is being advocated. You can do this online or by mail at the addresses shown in the box. **Submissions close on 15 November.**

The basis of the objection to the 'Waratah' stop immediately north of the Davis Street Bridge is apparently that cars dropping people off at the stop will drive down a short section of Weston Street off Windsor Road. This objection lacks credibility. The vast majority of residents using this stop will walk or cycle to it. In any case, it is entirely possible for a 'kiss-&-ride' point to be located on Davis Street with access to the light rail stop via steps from the Davis Street bridge or the short pedestrian lane from Davis Street to Weston Street. Such a solution is being investigated by Transport NSW's light rail project team.

We would also advise that you make your concerns known to your local MPs.

If you live *west* of the light rail line, contact:

The Hon. Linda Burney MP
Phone: 9718 1234
Fax: 9787 1999
linda.burney@parliament.nsw.gov.au
Level 2, Suite 201 & 202, 308-312 Beamish Street, CAMPSIE NSW 2194

If you live *east* of the line contact:

The Hon. Carmel Tebbutt, MP
Phone: 9558 9000
Fax: 9558 3653
marrickville@parliament.nsw.gov.au
244 Illawarra Road, MARRICKVILLE NSW 2204

EcoTransit Sydney is a not-for-profit public transport advocacy group. We have campaigned to have the light rail service extended to Dulwich Hill since May 2008. You can find out about us at: <http://www.ecotransit.org.au/ets/>. We can be contacted at: contact@ecotransit.org.au.

A message from



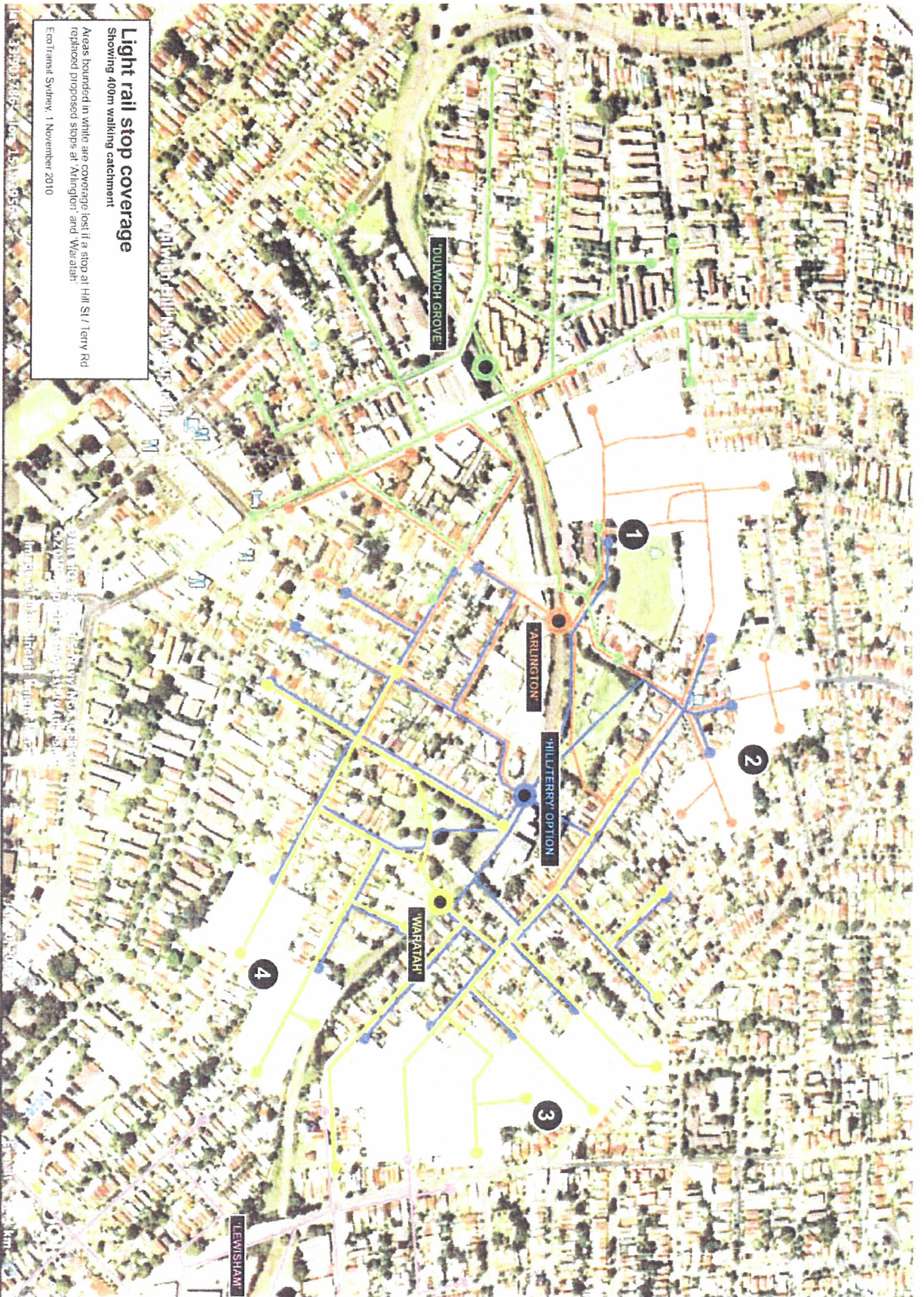
How to make a submission

The Environmental Assessment for the Sydney Light Rail Inner West Extension and the associated GreenWay project is currently on exhibition and submissions close on 15 November

The EA can be downloaded from http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=4097

Submissions can be made online (at this address) or by mail

Exhibition locations: Department of Planning, Information Centre, 23-33 Bridge Street Sydney; Nature Conservation Council, Level 2, 5 Wilson Street, Newtown; Leichhardt Council, 7-15 Wetherill Street, Leichhardt; Ashfield Council, 260 Liverpool Road, Ashfield; and Marrickville Council, 2-14 Fisher Street, Petersham



Light rail stop coverage

Showing 400m walking catchment

Areas bounded in white are coverage lost if a stop at Hill St / Terry Rd replaced proposed stops at Arlington and Waratah

Ecotransit Sydney, 1 November 2010

Submitted by:

This submission has been prepared by the following Dulwich Hill residents:

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	

The following Dulwich Hill residents also sign this submission as a true reflection of their concerns:

[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]

