

MODIFICATION TO CBD AND SOUTH EAST LIGHT RAIL PROJECT
STATE SIGNIFICANT INFRASTRUCTURE APPROVAL (SSI-6042)

COMMENTS ON ENVIRONMENTAL IMPACT (EIS) STATEMENT CURRENTLY ON
PUBLIC EXHIBITION

CLAIRE PAMENTER

Thank you for the opportunity to respond. I appreciated speaking to Ms Ingrid Ilias prior to making this submission, whose advice was most helpful.

As a longstanding City of Sydney resident and worker and frequent visitor to Randwick, I object to the modifications contained in the EIS on the following grounds:

1. The timing and brief period for public exhibition and comment should be extended from 17 December 2014. The period of consultation is inadequate both in duration alone but also because it coincides with the busy end of year. Ms Ilias explained that late submissions would be considered; I acknowledge her written advice to this effect and if the period of public exhibition is not extended, I request as I did to Ms Ilias, that this advice be published prominently on the EIS public exhibition website;
2. Ms Ilias explained that, like the public, the Minister for Transport has not provided the project business case to the Department of Planning and Infrastructure (DP&I). These decisions undermine public confidence in the project review process and reinforce the widely held view that there is no empirical justification for the project as currently defined;
3. The decisions in 2 above thereby render public consultations such as this one pointless as the information is based on unsubstantiated premises;
4. The summary table S.1 is biased and does not accurately describe the impact of proposed changes and is therefore quite misleading, describing all summarized changes as improvements;
5. It is impossible to properly analyse several aspects of the modifications in the time allowed, particularly for example the noise levels noted;
6. Loss of the right hand turn from Alison Rd into Darley Rd would force large numbers of vehicles to detour up to 2.5km through local roads to access Centennial Park;
7. Moving the stop from in front of Randwick Racecourse where it is convenient and safe for race goers, to occupy park land on the opposite side of Alison Road creates enormous safety issues and increases traffic delays on Alison Rd due to need for race-goers to stream across the six lane roadway. As a frequent user of this section of road I have been grateful for the steel barriers in the middle of Alison Road to prevent merry race-goers ambling out into the traffic and am puzzled why the Government would want to exacerbate this situation;
8. Additional loss of public amenity by reason of 7 above requiring the removal of many trees and walking paths along the Alison Road boundary of Centennial Park opposite the racecourse;

9. The location of the light rail along narrow and hilly Devonshire makes no sense and TfNSW has repeatedly ignored expert advice concerning better alternative routes. That said, if the Government insists on retaining this route, as the substation proposed for Wimbo Park adjacent to the Olivia Gardens site has been relocated, at least meet community requests to either (1) move the stop proposed for Ward Park to Wimbo Park or (2) locate an additional stop at Wimbo Park. This would provide access to the light rail for the many residents of that area and give some meaning to the oft-repeated TfNSW claims that the light rail will support the Surry Hills community. Government explanations that there would be insufficient users to justify this and that the train would not be able to pick up sufficient speed to cross into Moore Park are quite spurious and unsubstantiated;
10. Most claims made in the Modifications Report are unsubstantiated;
11. There are no detailed geological and engineering surveys in the Report justifying the proposed changes to the flood levy banks. These changes would increase the risk of severe inundation throughout Kensington especially with the vibration impact of 120+ tonne LRVs with metal wheels on metal tracks travelling at speed within one or two metres of the levy – a fact discounted in the report;
12. No modeling on safety, capacity, intersection and journey times is provided to justify the significant increase in the proposed length of the trains from 45 to 66m, an increase of over 45%, a change that will significantly affect noise and loss of amenity in many neighborhoods;
13. As an example of 12 above, how can one driver without station attendant or conductor equivalent observe all the door openings for the 66m train length when the normal operating model assumes 5 people standing per square metre, rendering direct line of sight impossible;
14. In 13 above, if the driver is forced to use cameras to check every exit/entry before closing the doors then journey times will blow out and community safety will be put at risk;
15. Lack of information to satisfy the community that coupling two separate trains together will satisfy 'crashworthiness' or 'buff strength requirements' and on the consequent implications for speed and safety;
16. The proposed change to the entry/exit of the trains onto Anzac Parade heading to Kingsford destroys more trees and creates an adverse impact on the surrounding intersection operation;
17. Requiring the many students from Sydney Boys and Sydney Girls High Schools to cross the light rail rails poses a safety risk, as does the platform, which is too small to accommodate this number of students safely.
18. Third rail wire-free infrastructure in CBD; it is explained that this APS system means that when two parts of the tram cover the recharge points at ground level that are 20 metres apart, the trams will recharge. Evidence of this claim is unsubstantiated.

Claire Pamenter
17 December 2014