

16 Dec 2014

NSW Government
Department of Planning and Environment

By email / web submission

Dear Sir / Madam,

CBD and South East Light Rail Project (SSI 6042) – Comments on Modification No 1

We refer to the exhibition of the proposed modifications to the CBD and South East Light Rail Project.

As was the case with the submissions report for the original application, Centennial and Moore Park Trust's (CPMPT) general comments in relation to the modifications report are to be read in the context of the following overall position of CPMPT:-

1. Any visual impact, impact on the environment or ecology of the park, reduction in amenity or reduction in actual parkland area must be kept to the absolute minimum required for the construction and subsequent operation of the light rail, and in a manner so as to cause the minimum disruption for the community and other stakeholders who use the parklands.
2. The ongoing operations and maintenance of the parklands is undertaken on a self-funded basis through revenue obtained from various activities or existing commercial agreements in place. Anything that impacts on the revenue stream to CPMPT must be replaced under the same terms as a minimum in order to maintain the ongoing operations.
3. Any impact on the parklands either on a temporary basis during construction or permanently, must be reinstated or replaced on at least a like for like basis in a manner and location as nominated or agreed by CPMPT.

As the Modifications Report makes reference to various areas of the Moore Park and Centennial Park precinct, rather than attempting to be specific about page numbers and sections which may result in a section being overlooked, we have simply commented on matters as they arise along the proposed route.

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1.0 Relocation of the Surry Hills substation

The proposed relocation of the Surry Hills substation to the western portal of the Moore Park tunnel is noted. In order to minimize the impact on the parklands we request that the substation is placed entirely underground with access and ventilation being provided from within the tunnel portal so it will not be visible from the park and would have no other impact on park amenity.

2.0 Stairs from bridge over Eastern Distributor into Moore Park West

Though not shown in the Modification Report, at a meeting between CPMPT and TfNSW representatives on Monday, 15 December 2014, TfNSW presented images that include steps leading up into Moore Park West from the new Light Rail bridge crossing the Eastern Distributor. As these steps appear to be on CPMPT land and are a potential risk and maintenance liability, CPMPT requests that they be designed to the highest standards to ensure they are safe, robust, in keeping with the parklands, and with sufficient capacity to comfortably accommodate peak crowds moving through the area during major events. CPMPT wish to be consulted on the final design of these stairs.

3.0 “Throw” screen on the bridge over Eastern Distributor into Moore Park West

Although outside the Parklands, the appearance of the new bridge across the Eastern Distributor is important to CPMPT because of its potential visual impact on the Park. Particular attention should be paid to the detailed design of the pedestrian throw screens on the bridge as a visually dominant element on the structure. CPMPT therefore requests that for consistency and to minimize visual impact, a similar approach to that of the RMS bridge over Anzac Parade be adopted where the throw screen design referenced colors and forms typical of the Moore Park landscape. CPMPT wish to be consulted on the final design.

4.0 Construction of the tunnel under Anzac Parade

The proposed change in the construction methodology of the tunnel under Anzac Parade is noted as potentially having a major impact on significant trees as a result of the temporary diversions required on both sides of the roadway to maintain 3 lanes in each direction during the construction work.

As has been reinforced in previous discussions and submissions to TfNSW, the majestic avenue of predominantly Moreton Bay Figs along Anzac Parade is one of Sydney's best

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examples of a planted boulevard. It is a distinctive landscape element in the precinct of enormous visual and heritage significance. This has already been compromised through the loss of trees in the approved design. The proposed change, which will result in the removal of an additional four significant trees and potentially adverse impacts on the root zones of five others, is a major concern and in our view should be reconsidered.

5.0 Visual impact of the Moore Park Stop

CPMPT had previously registered its concern about the significant visual impact of the stop in the approved design with its elevated concourse and 90 metre long platform. We acknowledge that the removal of the upper level and reduction in platform length in the proposed modification will reduce the height and volume of the structure and its overall visual envelope. However, the beneficial visual impacts of these improvements are offset to some extent by the addition of the stairs and ramps on the eastern side of Anzac Parade associated with the bridge connecting with the high school and the inclusion of what appears to be an amenities block for tram operators at the southern end of the stop (which whilst not specified in the Modification Report, we have been advised is proposed).

CPMPT requests that the visual impact of the stop on the surrounding parkland be further reduced by:

- ensuring the detailed design minimises the visual 'presence' of the proposed stairs and ramps; and,
- deleting the proposed driver / operator amenities block above ground and instead, locating it underground as part of the subways or relocating it to an alternative site.

6.0 Moore Park Stop subway access

CPMPT agrees that the proposed pedestrian subways provide a safer arrangement for access to the light rail platform. It is noted, however, that they will only be operational during event mode and will be closed at all other times. CPMPT is concerned that for the majority of time when they are not in use by the general public, the stairs leading down could become a haven for graffiti and other anti-social behavior, and a potential refuge for the homeless. Security monitoring of this area should be considered in the detailed design.

7.0 Catenary support poles

Though not specified in the Modification Report, at a meeting between CPMPT and TfNSW representatives on Monday, 15 December 2014, TfNSW proposed the

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placement of up to 3 poles on the west side of the bus roadway just south of the Moore Park Stop to support the catenary cabling for the light rail. The location of the poles in amongst the canopy of the trees along Anzac Parade may require pruning of these trees. This would be undesirable because of the trees' visual and heritage significance (see 4 above). The final location of the poles should be discussed and agreed with CPMPT so as to minimize any impact on the trees.

8.0 Realignment at Anzac Parade near Robertson Road

The realignment of the Kensington branch line from the main light rail trunk line at the end of Robertson Road (rather than at the Alison Road / Dacey Avenue intersection in the approved design) is of concern to the CPMPT because of the additional land take and impact on trees in this location. The loss of additional significant trees on Anzac Parade is undesirable for the reasons outlined in 4 above. Final design of the alignment should be done so as to minimize the loss of trees and loss of park land.

9.0 Loss of trees at end of Martin Avenue / Robertson Rd

Though not as significant as those along Anzac Parade, the trees along the edge of the end of Robertson Road / Martin Avenue provide an important visual barrier between the Anzac Parade roadway and the adjacent parkland and residential area. Their removal will have a significant and adverse visual impact on the landscape in this location and the amenity of the adjoining land. We request that the light rail alignment in this location be amended to retain these trees.

10.0 Realignment along Alison Road at the Doncaster Avenue intersection

The alignment of the light rail in Alison Road where it splits from the bus roadway at the Doncaster Avenue intersection and runs close to the edge of Kensington Pond has several significant impacts on the parklands, particularly in light of the approved Centennial Park master plan which has previously been on public exhibition and has now been adopted. The below impacts are highlighted for consideration:-

(a) The impact on the proposed entry to Centennial Park at this location, where there is a footbridge that crosses Kensington Pond

This entry to the Park is critical, providing the most logical and practical access from the Doncaster Avenue residential precinct. With the increasing residential densities planned for this area, access into the Parklands from here will become increasingly important. CPMPT has planned for this in its recently completed Centennial Park Master Plan which recommends a substantial upgrade to this Park entry and the

footbridge and the provision of new pathways in the vicinity which provide improved pedestrian and cycle connections through the Park.

The proximity of the alignment to the pond impacts on the plans to upgrade the entry, the bridge and the related pathway and access improvements. CPMPT requests that TFNSW provide funding and resources as required to undertake a revised master plan and to provide a replacement entrance to the parklands.

(b) The impact on the amenity and the character of the Park at this location

The more natural, wild and secluded character of the Park in this location will clearly be diminished by the proximity of the light rail to the edge of the pond. TFNSW will need to consider this and work closely with CPMPT to ensure that this quality is maintained.

(c) The removal of trees at this location

The importance of the line of paperbark trees along the western edge of the Kensington Ponds, known as "Maidens Row" is described below in 12. It appears that at least two of these trees will need to be removed with the proposed new alignment. For the reasons outlined below the loss of any of these trees is undesirable, and TFNSW is requested to consider this in the detail design of the light rail track alignment.

(d) The impact on the outer perimeter trail

The importance of this feature to the Parklands was strongly reinforced during the public consultation process undertaken for the 2013 Centennial Park Master Plan. It is much loved by park users as a "special" jogging and walking track and is highly valued in this location in particular because of its proximity to the pond and the wilder character of the Park in this area.

Because of the 'pinch point' between the pond and the proposed new alignment at this location, the outer trail will be significantly impacted – it is not clear how it would continue past this point.

While CPMPT understands the rationale for the alignment at this location (provision of queuing space for buses on the bus roadway) it needs to be carefully considered so as to preserve the space between the track alignment and the pond and to minimise the impacts outlined above.

CPMPT requests that TFNSW fund the following works which are a direct result of the proposed modifications:

- possible modification to the bridge location and form; and,

- the creation of space between the edge of the pond and the track alignment which could be through some land reclamation or a cantilevered boardwalk over the edge of the pond.

11.0 Flood mitigation

The proposed raising of the embankment along the western edge of the Kensington Ponds is noted. The corollary of this modification, however, is that during the major flood events for which it is designed, it will increase inundation levels in the southwest corner of the Park. The impact of this is of concern to CPMPT, particularly in relation to specific improvements currently being implemented in this area such as a new café and bike hire facility near the Childrens Learners Cycleway.

CPMPT requests that further environmental and flood modelling must be undertaken to better demonstrate the need for this work and to more clearly define impacts on the park lands and park facilities.

12.0 Loss of trees along Alison Road and the south west corner of Centennial Park

The removal of the trees along the edge of Alison Road will have a significant impact not only on views to the Park but views out of the Park, particularly from Ash Paddock in the very southwest corner with the result that the amenity of this space will be substantially diminished. Although on Randwick Council land, these trees currently define the edge of the Park and provide a strong sense of enclosure which contributes to the quiet secluded character of the southwest corner.

The loss of these trees would be compounded by the removal of the line of paperbark trees along the western edge of the Kensington Ponds, known as "Maidens Row" from Doncaster Avenue to Darley Road. We now understand that their proposed removal indicated in the Modification Report is an error and, at a meeting between CPMPT and TfNSW representatives on Monday, 15 December 2014 it was confirmed that removal of the trees was not required. We accept this but, for the record, register our strong objection if this was reconsidered.

Maidens Row, though of relatively recent planting (mid 1990s), has symbolic significance, referencing the significant contribution of Joseph Maiden, an early Director of the Park who was responsible for much of the parks landscape design. With the loss of the Council trees along the Alison Road edge, the retention of Maidens Row is essential to maintaining some screening of the southwest corner of the Park.

Of equal importance is the possible loss of two mature Fig trees on CPMPT land at the end of the heritage perimeter fence on the corner of Alison and Darley Roads. At the meeting between CPMPT and TfNSW representatives on Monday, 15 December 2014 it was indicated that removal of these trees may not be required. We record our strong objection to the removal of these 2 trees, and can see no valid need for their removal, given their distance from the light rail tracks at this point.

13.0 Visual impact of retaining wall

The partial excavation of the embankment and the construction of a retaining wall along the edge of the new alignment will have a major impact on views to the Park from Alison Road. CPMPT request that the final aesthetic design of the retaining structure is discussed and agreed with CPMPT to incorporate such features as a 'greening' of the vertical face of the wall with planting.

CPMPT also requests that the light rail tracks be given a similar treatment and turfed to green and soften their visual impact on the landscape. This practice is common in Europe and we would like to understand why it could not be replicated in this location.

14.0 Impact on separated pedestrian path and cycleway along Alison Road

The recent construction of separated bi-directional pedestrian and cycle pathways along the Alison Road edge between Doncaster Avenue and Darley Road by Randwick Council has been a welcome and successful initiative. It appears to be lost in the modified design with only a pedestrian path maintained near the Alison Road edge and bicycles relegated to a proposed shared path on top of the embankment.

CPMPT requests that the design be reworked to enable the accommodation of separated pedestrian and cycle pathways (or at least a shared pathway) adjacent to Alison Road. And further, that consideration be given to extending such a facility north along the Alison Road edge to the Dacey Avenue / Anzac Parade intersection. We believe that this provides a more logical and practical option for pedestrians and cyclists moving between Dacey Avenue and Darley Road.

15.0 Traffic impacts for access to Centennial Park

The proposed removal of the right turn lanes from Alison into Darley Road is of concern. This is the dominant means of vehicular access to the Park from the southeast, using the Randwick Gate. The loss of this option for these vehicles will require them to undertake a far more circuitous route to access the Park, either by filtering through the

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North Randwick residential area to Darley Road and back to the Randwick Gate or, by continuing along Alison Road, then Anzac Parade to Lang Road and into the Park through the Robertson Road Gate.

At peak park visitation times on the weekends, the loss of the Alison Road right turn capability seems unnecessary and more onerous for vehicles arriving from the southeast. We request therefore that further modelling of the performance of the Alison Road / Darley Road intersection under the modified design be undertaken to better understand the broader impact on traffic patterns around the park, and to confirm the need (or not) for this change.

16.0 Construction impacts on Park

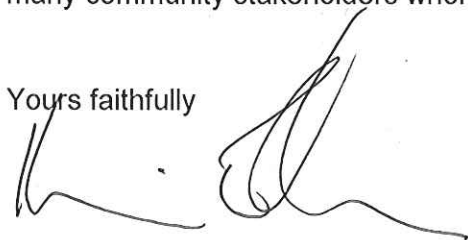
There is little detail in the modifications report of what construction areas will be required for the proposed Alison Road realignment. CPMPT is concerned that sections of the southwest corner of the Park (particularly Ash Paddock) will be required for this purpose which would have a significant impact on the use of this area. We are also concerned about potential environmental impacts of construction activities on the sensitive landscape and ecology of the Kensington Ponds area.

More detail is required about how construction activities in this area will be managed and, in particular, how any potential environmental impacts will be mitigated.

Timing and extent of any works areas are to be agreed with CPMPT, however we note that at this stage TfNSW have advised that no additional construction work zones will be required beyond what was agreed for the original planning proposal.

We look forward to the Department of Planning and Environment, and TfNSW reviewing our above comments, and responding with a view to finding mutually acceptable solutions for the many community stakeholders whom CPMPT as landowner represents.

Yours faithfully



Kim Ellis
Executive Director

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