



# Action for Public Transport (N.S.W.) Inc.

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Planning Services  
Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Attention: Karen Jones or Ingrid Ilias

## **CBD and SOUTH EAST LIGHT RAIL**

### **MODIFICATION ASSESSMENT REPORT SSI 6042 MOD 1**

A display advertisement in the Sydney press of 3 December 2014 announced the release of a Modification Assessment Report, SSI 6042 MOD 1, ("the Report") for the proposed CBD and South East Light Rail project, referred to as the "CSELR". Submissions were invited from the public, with a closing date of 17 December 2014.

We support the proposed modifications in general but have reservations about certain elements described in the Report.

We have made no reportable political donations in the previous two years.

The Report detailed a number of proposed changes to the CSELR which require the approval of the Minister for Planning before they may proceed. The Minister for Planning was also the Approval Authority for the original CSELR project proposal. We have concerns about the following items in the Report.

ITEM 1 – In general terms, we note that the cost of the project has increased, but the level of service to passengers appears to have decreased. More particularly,

ITEM 2 – The modifications to the Moore Park stop have not fully exploited the potential benefits for passengers (details below),

ITEM 3 - The nature and impact of the change in the length of the light rail vehicles (LRVs) is not fully explained (see below),

ITEM 4 – The relocation of the Racecourse stop is inadequately justified, as detailed below.

ITEM 5 – The adoption of the "wire-free" power supply is inconsistent on visual amenity terms with other aspects of the project (e.g. - advertising film on the LRV windows) and the justification for its adoption appears narrowly selective, especially when capital and running costs are considered – details below.

ITEM 6 – The policy of applying all-over advertising on the LRVs, including on the windows, should be changed. This item was not a topic in the Report. We are raising it independently.

We expand on the above list, as follows -

## ITEM 2 – MOORE PARK STOP

- a. We note the proposal to provide pedestrian underpasses at the Moore Park Stop. There appears to have been a change of heart regarding pedestrian tunnels at Transport for NSW (TfNSW) – a pedestrian underpass had been proposed as an alternative to the excessively expensive and intrusive “Tibby” Cotter Bridge currently being constructed over Anzac Parade in Moore Park, just 250 metres from the stop site. The proposal for a pedestrian subway was rejected at that time, on questionable grounds.
- b. The proposed pedestrian bridge can be dispensed with.

Consideration should be given to abandoning the proposed pedestrian bridge in favour of a western extension, under Anzac Parade, of the proposed pedestrian underpass at the northern end of the stop. Such an underpass would eliminate much stair climbing by students at the High Schools, as the general level of the school campus lies some four metres below the level of Anzac Parade. The extended subway would provide students with near-level access to and from the stop for their twice-daily commute. There are public health implications. Casual observation would confirm that many of the early-teen students carry significant loads in their backpacks. Reduced stair-climbing would be to their distinct advantage. The perceived negative public safety aspects of pedestrian subways could be ameliorated as there is usually teacher surveillance of departing students at the end of the school day.

The party or parties who are to bear the cost of security for such subways, should such security be found necessary, should just be a logical part of the design process and its associated cost-sharing contracts and agreements.

The schools (and the taxpayer) would benefit financially from an underpass by having a more convenient access to the entertainment quarter for their “major event” fee-paying parking patrons

The visual aesthetics of the Moore Park vista would be improved without the bridge. The bridge was described in the CSELR Preferred Infrastructure Report (p 6-41) as having a “high adverse impact overall during operation”. It is known that this is a matter of concern to nearby residents and other supporters of Moore Park.

- c. There may also be an opportunity, within the subway, for interpretive recognition of the World War 2 air raid shelters which were in the vicinity, and the remnants of the zoological park which previously occupied the school site.

## ITEM 3 – THE CHANGE IN THE LENGTH OF THE LRVs

Given the abandonment of 90m coupled LRVs, it appears the designers have accepted a much reduced line capacity between Central Station and the Entertainment Quarter for special events, using 67m long LRVs. This seems to represent an unjustified reduction in the level of service available to the public.

This disappointing modification could be somewhat future-proofed by ensuring that the track and stop layout at Moore Park are readily adaptable to the addition of a future off-line “loop” track, generally sited along Lang Road, Driver Avenue, and Macarthur Avenue, with an off-mainline platform in the vicinity of the Hordern Pavilion.

## ITEM 4 – RELOCATION OF THE RACECOURSE STOP

We are surprised that the preferred site for the racecourse stop has been moved to the north side of Alison Road. Given the potential for conflict between “event” crowds and road traffic on Alison Road, we would have thought a modification to the tracks entering the LRV storage facility, with a platform giving direct access to the racecourse grounds would have been fully justified, as it would provide valuable operational and pedestrian-safety benefits. There would be additional operational benefits in extending a track to the Kensington main line (via Ascot Street), thus avoiding the need for LRVs to change direction at the platform. It would also have separated “event” (racecourse) tram operations from normal service operations. We are forced to conclude that the design team has abandoned any serious effort to maximise the attractiveness of dedicated light rail services to the racecourse. This must have a negative impact on road traffic congestion in the vicinity on “race” days.

Should the modified site be adopted as planned, then the stop itself should be moved eastward, closer to Darley Road, for the benefit of every-day TAFE students and other tram patrons. It appears that this can be done while still retaining a turnback road for a 67m tram.

We assert that it would be in the public interest for the details of the land value transfers associated with the relocation of the stop, from racecourse property to Centennial Park or RMS property, to be made public.

## ITEM 5 – WIRE-FREE POWER SUPPLY

We note the intention to use Alstom's “Aesthetic Power Solution” (APS) continuous third-rail power supply to the LRVs at the north end of the Sydney CBD. The justification for this appears to us to be narrowly selective, over-riding the significant negative aspects of this form of power supply. For the record, we have been informed that this form of power supply can cost up to approximately \$38 Million per twin-track kilometre, and that is just the capital cost. We also understand that being a proprietary product, APS spare parts and maintenance equipment may only ever be available from a single supplier. This could incur significant cost penalties in the long term.

We request that the cost implications of this modification be thoroughly analysed by the Minister for Planning. In our view the modification should be rejected. Overhead wire should be used throughout.

## ITEM 6 – ALL-OVER ADVERTISING ON THE LRVs

Visual aesthetics have played a major role in the design decisions of the CSELR project. They appear to have led to the adoption of the wire-free power supply (Item 5, above). “Visual Quality” was the prime consideration of Conditions of Approval numbered B45 to B51 applied to the project by the Minister for Planning in her 4 June 2014 approval. Condition B46 prohibited third party advertising on structures, urban elements, and stops. Condition B50 requires the design and construction of the project to minimise opportunities for graffiti, requiring any graffiti to be removed within one week.

Unfortunately, nobody seems to have drawn attention to the irritation caused to LRV passengers caused by the use of perforated advertising film on the outside of LRV windows. How is such film different from graffiti? TfNSW has informed us that the policy regarding the use of this film on CSELR vehicles will be the same as that for the Inner West light rail line, where the film is in use.

The film spoils the view from the inside of the vehicle to the outside. We expect it would be particularly irritating to tourists. Wayfinding would be made more difficult as street names, for example, would be made difficult to read. It also renders pointless any attempt to take photographs from inside the vehicle. In wet weather, raindrops adhere to the film, turning everything outside the vehicle to a blur. This assertion can be easily confirmed by travelling on almost any Sydney bus, many of which have this perforated advertising film applied to the passenger windows.

In a letter to the Minister for Planning on 11 June 2014 we requested the Minister consider this problem with a view to adding an additional Condition of Approval to the CSELR project. We never received an acknowledgement.

We request that the Minister prohibit the use of any kind of film or other obstruction on the windows of the CSELR LRVs as a Condition of Approval of the modifications specified in this Report.

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