

(address not for publication)

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

Attention: Director - infrastructure

Re: CBD and South East Light Rail

Modification Application (SS1 6042 MOD1)

Dear Sir / Madam

I object to the modification for the South East Light Rail.

The change to the Moore Park tunnetiing and the change of the Allson Road stop cause hugely undesirable impacts. There are further concerns on the Randwick line, and of course in relation to existing issues on the line to Kingsford. There is no environmental regard in this proposal, even though it is imposing so significantly on the Centennial Parklands. The engineering for the tunnel is one thing; the dreadful impacts proposed for Alison Road verge on vandalism, and are totally avoidable.

I also object to the rush with which this is being implemented, especially considering the serious impacts. Submissions close on December 17 (after only 2 weeks' notification of some significant changes). Mr Goodling stated that his timetable is to have the PPP contract completed before the end of 2014. The obvious question is whether this is all just a 'done deal'. Mr Goodling stated at the public meeting on 10th December that the International Consortium who are awarded the contract will do the final design process for this project.

The Centennial Parklands: the Centennial Parklands are loved and hugely valued.

This area of the project is within the Centennial Parklands. Your document allows for 'property acquisition' on p.86 (F1 and F2). More than 125 years ago far-seeing planners set aside this area as 'a park for the people'. Centennial Park was the site for the nation's Federation ceremony. The design of the Park was for a formal, Victorian centre opening out to less cultivated perimeters.

Already your work is clearly impacting in Moore Park, turning the paved walk of commemorative Federation Way into a car park as you proceed with unheralded tree removal and clearing of the grassed parkland. You are altering the terrain. At the edge of the Parkland you are removing the long-established barrier that has protected the fields to a large degree from the impacts of traffic on Anzac Parade, and even the westerly winds.

Now your modification for the stop in Alison Road proposes an even worse impact against Centennial Park. Given Mr Goodling's explanation, this will not be carried out in accordance with any detailed plan but according to the ideas of 'an International Consortium'. If the Government thinks that this parkland can just be taken so freely why would the Consortium have any respect for it? The Immediate and long term Impacts could be devastating. There is nothing in your document to give any confidence for the outcome here.

## Some specific modifications of concern:

### 1. Anzac Parade tunnelling.

Clearly the changed process to be used, because of the sandy soil, will result in even more tree removals. There will be direct removals, but also impacts on roots and canopies with the process of widening the road to procede with stabilisation will potentially lead to further tree loss. Commemorative tree-lined Anzac Parade

running through lovely parkland will become only a memory.

### 2. The Moore Park stop modification.

The height reduction would seem to be an improvement, however it is difficult to ascertain the full impact here. This must still be a significant structure in the park, but how would you know? It is not clear how far beyond the bus road the rail lines are in the park. The Information and diagrams too often seem only to be 'indicative'. (Figures 3.5 and 3.6 have no scale.)

It is very clear that the focus of this line and this stop is 'major events'. There may be a need for this at times. It always seemed that 'major' sporting events and UNSW are the designed beneficiaries of the light rail given the very few stops on this line. Against that a lot of parkland will be seriously affected, and public transport for residents of suburbs south of here will offer many fewer options than there are currently, along with longer journeys associated with more transport changes.

## 3. The new Alison Road stop.

You make it clear that this is primarily for the benefit of the racecourse.

When Mr Goodling spoke at the most recent public meeting he made it clear that a main reason for this change was so that the racecourse could retain buses on their side of the road, as well as having light rail.

#### The modification involves:

(a) removal of all trees along the side of Centennial Park, from Doncaster Avenue to Darley Road.

Figure 3.22 Indicates the appatiing extent of this devastation, extending right to the trees growing beside the pond.

Figure 3.21 must be misleading. There are no trees left there, and you will obviously not plant trees adjacent to the overhead wires. The rail track is shown at road level even though the embankment is to be raised. The proposed revegetation is a pathetic substitute for what exists at present.

- (b) a 3m retaining wall to the east of the light rail, with admitted visual impacts .
- (c) admitted increased flooding for Centennial Park.
- (d) traffic changes at Darley Road. There can currently be congestion and traffic delays here, even without the added complication of a very long light rail. (There is a significant entry to Centennial Park at Darley Road' which could be of more value to many people who prefer to spend weekend time in the Park, with family or friends, or just for their own enjoyment, than getting wasted at the races.)

### Effects of these changes:

- (i) These changes give this transport proposal dominating control over the visual and environmental quality of this south-west area of Centennial Park. Obviously with overhead wires there can never be a tree-lined embankment here again. For Centennial Park there can never be shaded walkways here again. There can be no softening of traffic noise. There can be no protection from westerly winds. There can be no visual barrier against the buildings of the racecourse and beyond.
- \*\*\* Note: Figure 3.19 shows a broken blue line beside the 2 rail tracks. Mr Goodling said that this indicates a 3rd rail track, for use if an extra 'train' is needed for a major event. Given that, how much further into Centennial Park is land taken? The proposed 3m retaining wall must be quite close to the ponds. This is just wrong.
- (II) Flooding. The plan to protect the rail line and the rail 'stabling' from flood risk falls on Centennial Park having to take the light rail's problem. There is no explanation of exactly what that means, other than it will be achieved by a raised levee bank. There must need to be changes to the

p2./d

existing water exit facility, with changes to the embankment and indeed with the rail lines running there. There is no environmental assessment of this impact within Centennial Park, for example of how long or to what extent the Park will have to retain water.

- Note: The statement that vegetation by the ponds requires periodic inundation suggests that noone has looked at what plants are actually there. You should also remember that there is an identified ESBS remnant beside the pond at the Doncaster Avenue area. That obviously does not require inundation. (3.7.1)
  - The fact that there is a migration of eels from Centennial Park via the waters that feed to Botany Bay must be taken into account in associated construction work and / or water infrastructure changes.
  - In 2003 the water outlet was reconstructed after the collapse of the embankment in Alison Road in unusual circumstances. This reconstructed outlet has been very efficient.

Surely the racecourse can conduct its events without causing so much (and potentially further) environmental damage to the Centennial Parkiands. Nowadays the actual horse racing seems to be secondary to other racecourse activities. While there must be a lot of money involved in the gambling and alcohol industries, surely our Government should have some ethical considerations to protect the environmental quality of parkiands of such cultural and heritage value.

This is not happening in this proposal. This is dreadful.

# 4. Allson Road to Wansey Road.

The proposal states that 25 trees will now be preserved at the racecourse, with the Racecourse stop now on the Centennial Park side of Alison Road. This is misleading. Clearly many, many trees will go along the entire route of the South East Light Rail line. There are many trees here that overhang the road. That obviously can't co-exist with the overhead wires of the light rail. The beautiful, shaded, tree-lined streets are also going to be trashed. (Similar impacts will also be seen for the entire length of Anzac Parade to Kingsford on that line).

Figures 3. 27 and 3.24 show exactly the same proposal at Moore Park, and even in the conservation area of Martin and Robertson Roads. There must be environmental impacts when the bus lane becomes shared with light rail. Mr Goodling also said at a previous public meeting that the removal of trees would be at the discretion of the contractors and their economies - it can be expensive to remove trees. This might determine that some trees are retained, he said. Nowhere is there any examination of the environmental impacts of this wholesale removal of trees. Nowhere is there a costing of the value of all these established and significant trees. The trees cannot be replaced like for like, nor can extensive stretches of this light rail route be replanted at all due to interference with the infrastructure.

It is misleading to suggest that the preservation of Tay Reserve is a great thing when the edge of Centennial Park, the streetscape of all roads of the route, and High Cross Park are all being devastated.

# 5. High Cross Park.

The modification document does not give details about the worsened impacts from the longer light rail vehicles and the necessarily longer platform at High Cross Park. At the 10th December public meeting Mr Goodling initially said that there would only ever be one vehicle in the Park at a time, but later said there could be two. Discussion suggested an understanding within the community that the lines will bite further into the Park. There is very widespread local concern about what is proposed for High Cross Park, and an absolutely widespread feeling that you just don't care.

## 6. Longer vehicles and signalled intersections.

Longer vehicles are proposed to match current passenger numbers provided by existing transport for residents in this area. Mr Goodling admitted that the 'ideal' number of light rail passengers in longer vehicles does not match the reality. There is no certainty that this very expensive project will match existing carrying capacity. It puzzled me to read in *The Sydney Morning Herald* that the proposed longer vehicles are used in very few places in the world, I think it said Casablanca and Tunis had long vehicles.

Clearly the light rail vehicles will need to have uninterrupted trips. (If it is too difficult to have more stops for passengers because they slow the journey, there can be no stopping for traffic.) The proposed longer vehicles and signalled intersections could have impacts on traffic flow. After all, in this area of Sydney there are just not alternative routes for traffic. Consider how important Avoca Street is as a route to many residential areas here. There is potential for ongoing and serious traffic congestion. People who live in suburbs around Anzac Parade are very concerned about the change of the Kingsford roundabout to a signalled intersection. Of course businesses who face the potential clearways along High Street and Anzac Parade have been given no comfort.

#### 7. Construction zones.

Current work in Moore Park is building a cyclist / pedestrian bridge to be ready for the 2015 World Cup Cricket event. Large areas of parkland have been taken for construction zones for that work. There are not indications in your Modification Proposal of just where your construction zones might be, with their own potentially destructive impacts.

### Conclusion:

It has always seemed that the major beneficiaries of the South East Light Rail are to be the football and cricket stadiums, the racecourse and UNSW. This Modification does give emphasis to the importance of 'Major Events'. (There is reference to an improvement for TAFE with the new Alison Road stop. There has been little reference to TAFE before. It reads just the same as saying that Tay Reserve will now not be impacted. These are not sufficient justifications for the destructive environmental impacts of what is proposed.)

It is not clear to residents that the expense of this light rail will result in improved public transport. As Director of this project Mr Goodling can only say that what happens with buses is not a part of his project. Nevertheless it has been made clear that ciry-bound bus services will end for residents of all these surrounding suburbs, with transfer to the light rail at High Cross Park being necessary. (Of course, Randwick ratepayers will have to bear the cost of providing parking at Kingsford with the loss of even everyday parking on such a large scale. It seems that always with this project someone else has to pick up the pieces and costs, unless you are one of the key beneficiaries.)

In this process totally unacceptable environmental impacts are inevitable. It does not seem that the project has any concern with this at all. You are dealing with Parklands that have great cultural and heritage value, and you don't seem to care at all about the devastation. I doubt that anyone who is familiar with the proposal has any confidence that there could be any successful remediation for what will be destroyed. This is obviously proved by this very Modification, with its change of the Alison Road stop in order to benefit the racecourse.

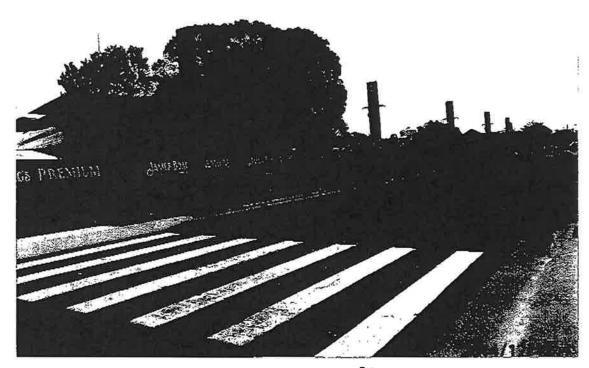
At the very least more time needs to be taken. More careful, accurate and truthful information is needed, along with genuine assessment of environmental impacts. Otherwise our precious parkland is simply being left to the mercy of contractors. This is not right. A very serious rethink is needed.

Yours sincerely

W. Ward

Vivien Ward

Centennial Park is the people's park! It is the lungs of the org.
Its trees about pollution



RANDWICK RACECOURSE AT ALISON ROAD.

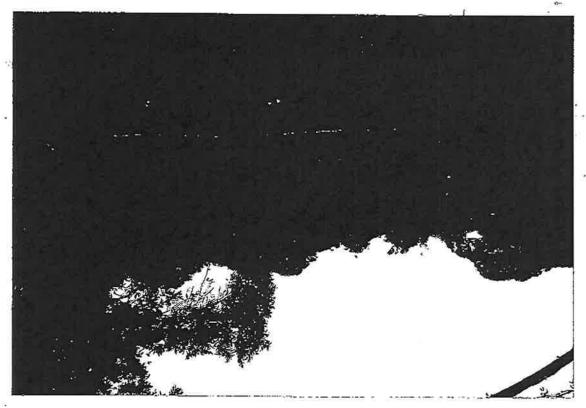
-RORD SUrface and alcohol promotion.

(There is some planting adjacent to the footpath.)



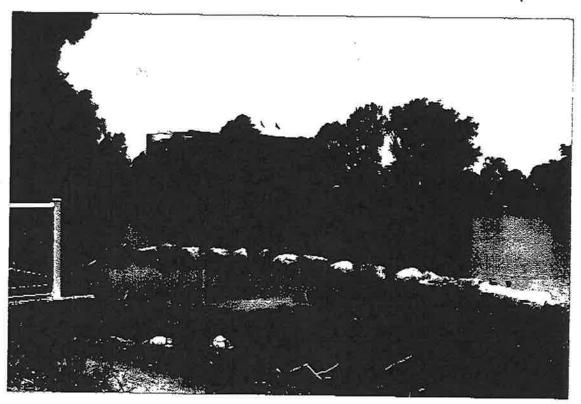
2. TREES EDGE CENTENIA PARK ON ALISON ROAD.

4. INSIDE CENTERNIAL PARK LOOKING TOWARDS THE RACECOURSE,
The trees provide a vicual, accounts and pollution barrior
for Centernial Park.





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5. KENSINGTON POND, CENTERNIAL PARK

Trees block traffic impacts and limit the visited impacts of buildings.

(The 2003 water out 'weir' and drainings system to the right)



6. KENSINGTON POND, CENTENNIAL PARK.

Agen, trees limit the impacts of what is beyond the park.

THIS IS HUGELY IMPORTANT.