



Submission for the Sydney CBD and South East Light Rail Project Modification 4 -UNSW Stop

Kenvale College, 38 High Street is a Registered Training Organisation that delivers courses in Hospitality, Cookery and Events ranging from Certificate II to Advanced Diploma. Most of our students come to classes three days a week and work in industry the rest of the week. Our premises has a capacity of 300 students operating 8.30am to 5.30pm, five days a week. At any given moment the maximum number of students we can have on campus is 130 students.

This submission will present three approaches. The first is to object to the modifications for the changes of the UNSW Stop and outline our reasons why. This first section is the stance we want to take and that our voice of objection be heard. The second and third approaches adopt a more cynical view, in that the modifications will proceed despite community consultation and thus we want to put forward suggestions to NSW Transport on the current proposal and express our expectations going forward. The second approach provides additional changes to the Modification 4 Proposal. The third approach outlines our suggestions and expectations of NSW Transport going forward.

1. Objection to the Modification of the UNSW Light Rail Stop to the North of High Street

The two main justifications for the the reconfiguration of the UNSW High Street stop arrangement are safety for passengers catching and alighting from the light rail carriages especially during peak times and to reduce the potential impact on sensitive equipment in UNSW research facilities close to High Street. If NSW Transport is really concerned about the safety of passengers and they see the best solution is to have two separate platforms then **the reconfiguration should move to the south of High Street not the North as proposed.**

If there is an absolute need, which we do not see as adequately justified in the proposal, for NSW Transport to reconfigure the platform from one to two separate platforms then the most logical solution is the south side of High Street so that **the large volume of UNSW staff and students will not have to cross traffic/road.** The smaller number of Kenvale College staff and students will need to cross the road but this will be less disruptive to the movement of traffic and vehicles. This suggestion aligns with the Light Rail coming along Wansey Road adjacent to Randwick Racecourse.

We acknowledge that the solution we are suggesting, although better from a town planning perspective will have potential impacts on sensitive UNSW equipment. We believe it is **NSW Transport's responsibility to ascertain the real impacts on the sensitive equipment, as at the moment the proposal only states hypothetical potential EMI on sensitive equipment** and NSW Transport should **compensate UNSW to mitigate the impact by reinforcing the local environment of the equipment.** The Lowy building is a very modern building and it is highly likely that once NSW Transport has adequately investigated the real EMI it could be quite insignificant. UNSW as a major proponent of Light Rail for South Eastern Sydney and could have foreseen this EMI impact and if they did not foresee it they

have a large campus to relocate the sensitive equipment. **It will be cheaper for NSW Transport to compensate UNSW to mitigate the EMI on sensitive equipment than to compensate the five properties for impacts of the proposed reconfiguration on the north side of High Street by denying them vehicle access to High Street.**

The approved Light Rail plan gave us one way street access. The proposed plan takes this away from us and gives us **shared driveway access** from Arthur Street with four other properties. In our opinion this is **not equitable**. Our property's sole driveway access is being denied us for a poor town planning solution. Our physical address is 38 High Street but the proposed plan is asking suppliers, couriers, visitors, prospective students, High School teachers, short course students, prospective new staff, industry people, sales representative etc. to find us and access us through Arthur Street. Kenvale College's first point of contact for all new parties (customers, suppliers, government agencies etc.) is the administration building fronting High Street. It is also our experience that when people visit the College for the first time they tend to drive to our premises and many, such as couriers, suppliers and sales people only drive. The proposal of **losing High Street driveway access is going to have a commercial impact on our business.**

An educational institution such as us **does not want to share road access with a significant number of private property owners or rental tenants.** We are also convinced that private home dwellers do not want to share road access with a commercial educational entity like Kenvale College. We have a large volume of people entering our premises Monday to Friday and very often during evenings and on the weekends since we have many other activities that will also impact them.

Privacy and security is also going to be affected by this proposal. Our premises are enclosed with the only access being High Street which is currently gated and we can monitor traffic and people coming in and out. The proposed modification is going to expose our buildings and our people to the residential units next door; many, many people on the platform in front of us; and exposure from Arthur Street. **We are going to lose our privacy and we are going to need to significant investment in more security for the premises.**

We are seriously concerned about the **impact on the working environment of our staff and on our student experience while at College** of having the light rail constructed and operating so close to our premises. There will be noise and vibration impacts, during both construction and operation on the offices immediately adjacent to High Street. We have classrooms in the front administration building and our learning environment will be impacted. Our Academic building at the back of the property and the delivery of classes will be impacted during the proposed road construction of the Arthur Street access lane. During both the construction of the proposed Arthur Street access road and the construction of platforms and rail tracks so close to our building on High Street we foresee both buildings being impacted by dust and dirt leading to an uncomfortable working and learning environment.

One of the main reasons for the proposed reconfiguration of the platform is the significant volume of people using this stop. However we do not think we should **have this significant volume of people alighting in such close proximity to our business and interfering with our commercial operations** when the destination of most passengers will be UNSW.

The proposal provides access to the carpark from Arthur Street. Kenvale College is the primary user of this shared carpark not Creston College. We estimate that we will **lose at least five carparks** with the two vehicle access points into this carpark as outlined in the plans. One of these carparks is the front parking bay on High Street. This carpark will become redundant as it will be very difficult to turn around given the proximity of the Light Rail platform and thus a driver's only recourse will be to reverse down the long driveway either on entering or leaving the carpark. The Light Rail will be very beneficial for most of our students, however most of our staff are part time and are currently working in the industry and they have other commitments on the day they teach at Kenvale. **We have been able to attract and retain very good lecturing staff because we have carpark facilities.** Some of our teaching and administrative staff live locally, are part-time and have young children and have chosen to work at Kenvale because of the convenience of driving to work since we provide a carpark. The loss of carparks is going to have human resource implications and most likely commercial operational impacts.

We are also **very concerned about the loss of street parking** as a consequence of this proposal and the impact on our business. We have many activities such as open days, hospitality high school teachers in-service training, industry events, restaurant service both with lunch time and evening dining services, short courses etc. that attract participants from a wide geographical area, including regional NSW. Some people have access to public transport but many don't. The loss of street parking is going to impact our business but clientele attending these activities will also add to the negative impact on the local area of the proposed street parking loss.

A major concern for us after analysing Appendix B Traffic, Transport and Access Impact Assessment are the significant and extensive problems identified in this report that NSW Transport has not addressed, especially for Arthur Street, but all streets in the area. **The proposal is taking away our driveway access and asking us to use Arthur Street but Arthur Street is going to be so congested and this is going to adversely affect our business.** The proposal does not make town planning sense.

Signage is also going to be a problem for us both on High Street and Arthur Street. This proposal is going to make it harder for people to find Kenvale College and we are concerned about the commercial implications. We believe **it is going to be hard for people to find us in the middle of a Light Rail platform.** The lane way in Arthur Street is quite narrow and there are properties adjacent to the lane way. **We cannot see where we are going to legally put our signage up on Arthur Street so people can find our business.**

We have been **consulted** but **very late** in the process. We were first approached in late October 2015. We believe we should have been in discussions very early on and provided with more evidence on the processes and decisions made over the nine months. We also believe there has been a **lack of due process** due to the short consultation period given the significant changes proposed to the UNSW stop.

2. Suggested Changes to the Proposed Modifications



NSW Transport in considering alternative options did not really **consider a two platform configuration on the South side of High Street**. We would like to suggest they consider this option immediately and seek community consultation. If the current proposed modification consultation is anything to go by, NSW Transport only needs two weeks for community consultation. Two platforms on the south side of High Street do not need to delay Light Rail construction.

We would also like to suggest to NSW Transport to consider **moving the two platforms 40 meters east** so the actual platform is not in front of our commercial educational premises. We acknowledge we will not have driveway access with this proposal but at least we will retain our building street frontage with less interference from a Light Rail platform.

3. Expectations if the Department of Planning approves the Proposed Modifications

The proposal indicates that the Arthur Street lane way will be 6 meters wide. We have commercial teaching kitchen with daily food deliveries, deliveries for an operational teaching bar, trades people on the premises nearly daily, commercial cleaners early in the morning and many other service vehicles frequenting our premises. We expect NSW Transport to **ensure that two trucks can drive on this lane simultaneously**. Currently we have one lane access but we have a parking bay and we control entry and access of vehicles. We lose this control with driveway access on Arthur Street.

In our consultation meetings with NSW Transport it was mentioned that Randwick City Council will not drive into the Arthur Street lane to collect the rubbish of 36, 38, 40, 42, 44 High Street. **We suggest that NSW Transport demands that the garbage trucks come to the hammer head as indicated in the proposal**. We suggest that both NSW Transport and Randwick City Council take a drive along High Street early on a Monday morning and count the number of garbage bins from these properties. They will soon see that it will be physically impossible to put all those garbage bins on Arthur Street near the lane way.

We want to be **closely consulted on the construction phase** to minimise the impact on our business. We expect to receive detailed reports on noise and vibration impacts so that we can study with NSW Transport how these can be mitigated so they do not impact the working and learning environment of our business.

We expect to be closely consulted in the detailed design phase of this project if we have the misfortune of the proposed modification being approved by the Department of Planning.

Yours sincerely,

Dr Anne Zahra
Managing Director