18 December 2015

Director Infrastructure
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Sir / Madam

CBD and South East Light Rail Project – Submission to the EIS

The University of NSW supports the Light Rail Project. UNSW's Kensington Campus is forecast to be the largest single customer destination with two light rail stops. UNSW's submission is supported by external traffic, safety, planning, design and utilities advice.

UNSW has two main areas of concern it would like to raise with NSW Planning in regard to the proposed planning modification from Transport for NSW:

1) Inconsistencies in the modification report and documentation:
    a. The High Street Stop southern side platform width is shown at both 6 metres and 4.1 metres in width in different parts of the document. The width should be consistent and should be 6 meters in width as this is critical for safety.
    b. The documentation refers to an agreement between UNSW and the child care operator. As previously advised to TfNSW, on several occasions, UNSW is the owner and operator of the childcare centre. Any reference to "an agreement" should be amended to a UNSW commitment regarding our childcare centre.

2) Lack of consultation and process:
    a. As the landowner UNSW, was unaware of the extent of the land take for the hammerhead in the Arthur Street laneway until receiving the modification report. The hammerhead is not required because garbage trucks do not access private properties in the Randwick City Council area. This was advised to TfNSW at a meeting with UNSW and Randwick City Council.
    b. No process or consultation has occurred to date on the stop safety audits, EMI criteria and limits, required before construction commences.
    c. Two weeks is insufficient time to review and respond to the planning modification. As a key partner and landowner UNSW was not sent any Planning Modification information in advance.

These issues make it much harder for UNSW to engage meaningfully in the modification process. UNSW requests the revised approval must include better defined and more meaningful consultation requirements on the part of TfNSW be included to remedy this.

Our proposal is that TfNSW be required to provide evidence that the actual documentation has been provided to landowners and affected parties. Further that there is evidence that sufficient engagement to allow for explanation, review and feedback of the documentation, including due consideration to any points raised.

Yours sincerely

Jason Coombs
Director of Strategy
Office of the Vice-Chancellor, UNSW

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1. Introduction

This submission has been prepared by University of NSW (UNSW).

UNSW strongly supports the Project and the public benefits it will bring to the community, the Precinct and to the University.

The proposed CBD and South East Light Rail (CSELR) project (the Project) provides a once-in-a-generation opportunity to provide central and south-eastern Sydney with a world class light rail system. As a key partner in the Randwick Education & Health Specialised Precinct (Precinct) and the CSELR delivery process, UNSW is committed to working with Transport for NSW (TfNSW) in the delivery of this important infrastructure project.

UNSW shares the same objectives and stated likely public benefits as TfNSW. UNSW has also identified its own key Project objectives since its involvement as a lead partner and key stakeholder in the process. These key objectives are:

- Staff and student safety;
- Improved urban amenity;
- A fully integrated transport solution;
- Environmental sustainability;
- Business continuity; and
- Capacity and capability for the future.

Whilst these objectives were broadly met by the scheme approved on 4 June 2014 (as modified). UNSW has focussed its attention on its fundamental concern, staff and student safety, to ensure a consistent, but superior outcome may result, not only for its community, but also the wider community. Concerns remain and have been further identified following the review of the exhibited material of the State Significant Infrastructure Approval (SSI-6042), Modifications Report (MOD 4, dated November 2015).

This submission addresses the concerns arising from the Modifications Report with specific regard to the impacts associated with the revised UNSW High Street Stop, as well as a range of remaining construction and operational concerns.

The key aspects from the Modifications Report are:

- Potential impacts to pedestrian and motorist safety
- The risk of noise, vibration, electromagnetic interference (EMI) and radio frequency interference (RFI) impacts upon sensitive teaching, research and other University environments during construction and operation of the light rail as a result of the proposed amendments
- Lack of consultation with UNSW
- Impact to traffic on surrounding street, particularly along High Street as a result of the proposed modification; and
- Impact of the proposed stop design on UNSW properties

Other issues include the impacts upon general UNSW operations including construction and post-construction impacts and maintaining ‘business-as-usual’ in terms of traffic and access, and bus services.

It is essential that UNSW ensure its typical daily operations can continue as unaffected as possible in recognition of the importance the University plays in the Precinct and to the economy in general. Significant detrimental effects have the potential to introduce wider-ranging and longer-term impacts upon the Precinct’s and University’s viability, amenity, character and reputation.

1.1 UNSW Properties and Ownership

UNSW owns a majority of properties in the block to the north of the campus bounded by Arthur Street, Botany Street, High Street and Wansey Road. The ownership within the block is shown below in Figure 1 (with UNSW owned lots marked in RED).

Importantly, UNSW owns a number of lots fronting High Street (on the northern side of the proposed stop) that will be affected by the proposed modification of the High Street Stop. Additionally, Creston College and Kenvale College, whilst not being owned by UNSW, are closely affiliated with the University, and will be affected by the proposed stop design.

UNSW also owns and operates the Childcare Centre on Botany Street known as Tiggers Honeypot at 22-24 Botany Street, Randwick (marked N in Figure 1 below).

The area to the rear of Tiggers Honeypot being affected by the proposed works does not form part of the formal licensed area of the childcare facility and is presently an informal use area of surplus UNSW land. Therefore there is no loss of the formal childcare space as a result of the current Modification 4 proposal.

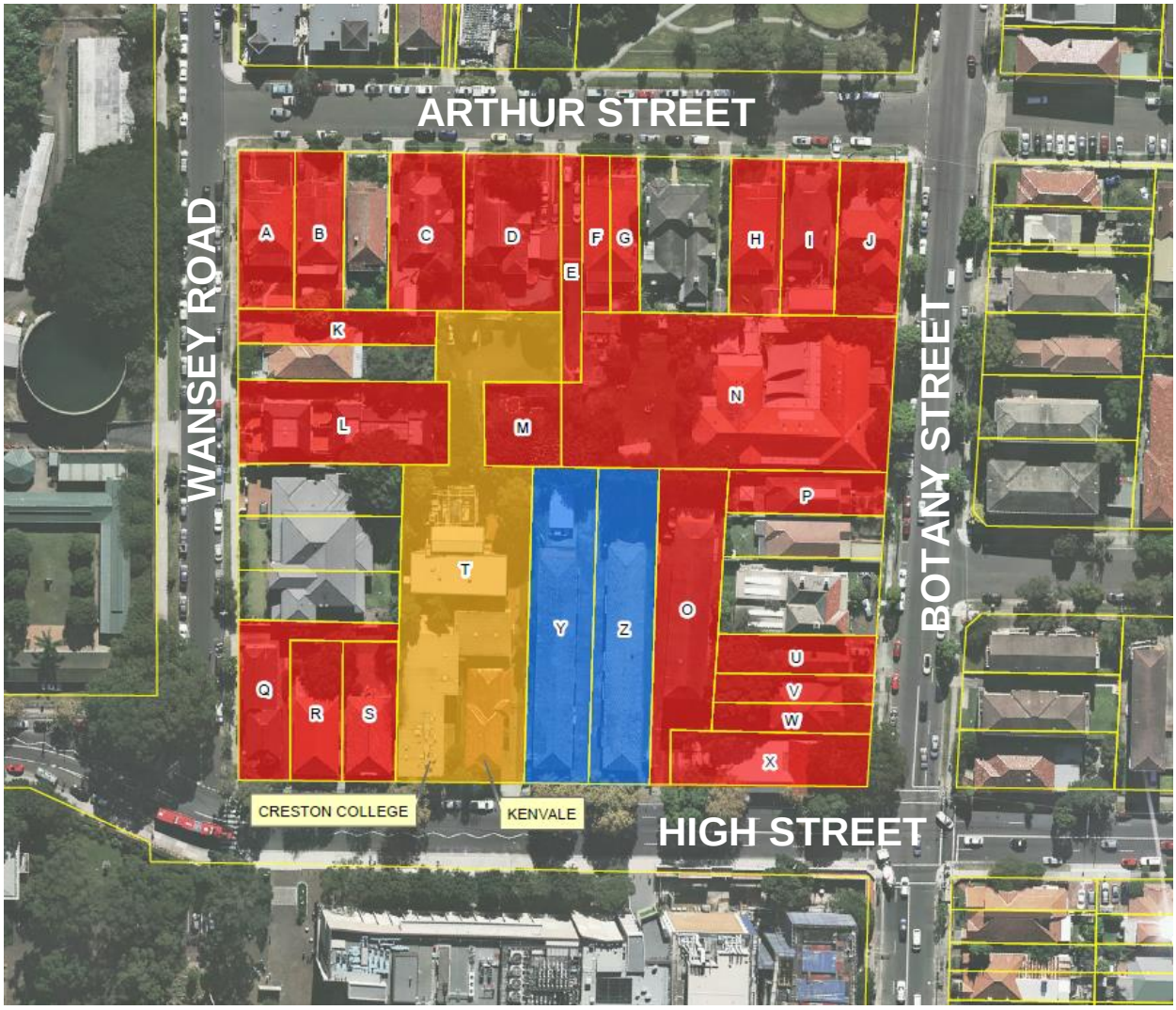

Figure 1 – UNSW Land Ownership (UNSW owned properties in RED) [*Source: UNSW/TfNSW*]

2 UNSW Supports the Project

As a key partner in this once-in-a-generation project, UNSW strongly supports the Project and its broader objectives and wide-ranging benefits it will bring to the CBD and the south-eastern suburbs, for the following reasons:

- The opportunity to improve pedestrian and passenger safety, in particular for UNSW students and staff within the network;
- Improved reliability, efficiency, amenity, capacity and quality of the public transport network;
- The provision of a fully integrated transport solution with access to major destinations in the south east including Moore Park, UNSW, Royal Randwick Racecourse and the Randwick Education & Health Specialised Precinct (Precinct);
- Opportunities to improve the overall amenity of public spaces and the public domain;
- The increased use of sustainable transport modes and improved environmental sustainability;
- Meeting long-term travel demand between the CBD and suburbs to the south east and leaving a lasting legacy; and
- Facilitating orderly and efficient growth of urban development and economic activity along the corridors and particularly within the Precinct.

Reflecting this support and partnership approach UNSW continues to provide resources to the Project.

3 Key Issues Arising from the Modifications Report

3.1 Risk to Pedestrian Safety

3.1.1 Platform Width

UNSW fully supports the intention to revise the design from a centralised platform to a split platform design with north and south platforms and a centralised rail alignment. However, in reviewing the application documentation, inconsistencies have been identified in the proposed platform width.

Section 3.2.2 (page 16) of the Traffic Report (Appendix B to Modification 4) indicates that the southern platform will be designed to a width of 6m. However, Figure 6.3 (of Appendix B) indicates a southern platform width of 4.1m. Concern is raised regarding the consistency of these figures, and more importantly to potential impact the area of land required to be dedicated to TfNSW by UNSW.

Based on information presented in Altrac's Pedestrian Modelling Design report from June 2015 provided to UNSW, Traffix have undertaken stop capacity calculations.

Using the same methodology (shown below), it is considered that:

- Southbound stop (toward Randwick Terminus) – proposed 3.2m + 1.5m footpath is adequate for BOARDING passengers (design capacity of 500 per hour) to achieve Level of Service (LOS C).
- Southbound stop (toward Randwick Terminus) – proposed 3.2m + 1.5m footpath is NOT adequate for ALIGHTING passengers (design capacity of 3,000 per hour) to achieve LOS C, but achieves LOS D which is considered appropriate for short amount of time when large numbers of alighting passengers get off LRV.
- Northbound stop (toward CBD) – proposed 4.1m side platform is NOT adequate for BOARDING passengers (design capacity of 3,000 per hour) to achieve LOS C, but achieves LOS D. Based on the calculations, a stop of 6.0m width would be required to achieve LOS C. NB: The Altrac report considered a 4.65m wide central island stop was adequate.
- Northbound stop (toward CBD) – proposed 4.1m side platform is adequate for ALIGHTING passengers (design capacity of 500 per hour) to achieve LOS C.

In consideration of the above it is requested that TfNSW appropriately confirm the platform capacities and set out of the proposed stop layout cross section to the Department of Planning and Environment (DPE) and UNSW prior to the finalisation of the assessment.

The UNSW Preferred Scheme to fully pedestrianise High Street between Botany Street and Wansey Road as outlined in Section 4.4 of this submission and Attachment B) indicates how platform widths can be readily expanded and pedestrian safety can be significantly improved by removing the west bound vehicle lane on the southern side of High Street

3.1.2 Stop and Road Safety Audits

Whilst the split platform option is deemed to be safer, the outcomes of any Stop and Road safety audits have yet to be provided as required under SSI Approval Condition B27.

These audits should be provided to UNSW as soon as possible to identify any safety issues and so that these can be appropriately addressed and integrated into the design in a timely manner rather than being retrofitted on or post completion.

3.1.3 Cycle Path Design and Safety

Concern is raised over the proposed cycle route interface at the intersection of Wansey Road and High Street. Given the design of intersection the Wansey Street southbound and northbound cyclists will move through corner across the curved tracks (as shown in Figure 2), increasing the likelihood of accidents to cyclists and affecting the safety of cyclists, pedestrians and motorists.

The Traffic Report accompanying the modification (Appendix B Section 4.5.5) notes that further investigation is recommended during the detailed design stage to allow for a more efficient bicycle connection along Arthur Street, in consideration of increased traffic flows (and in accordance with SSI

Approval Condition B33). However, as part of the Modification 4 Traffic Report and Main Report, the cyclist interaction and safety at the corner of High Street and Wansey Road is not considered.

Given the likelihood of accidents to cyclists and impact to the safety of cyclists, pedestrians and motorists at this intersection it is recommended that mitigation measures be utilised at this intersection to ensure safety is maintained in the area, without impacting the amenity and flow of traffic or Light Rail Vehicle (LRV).

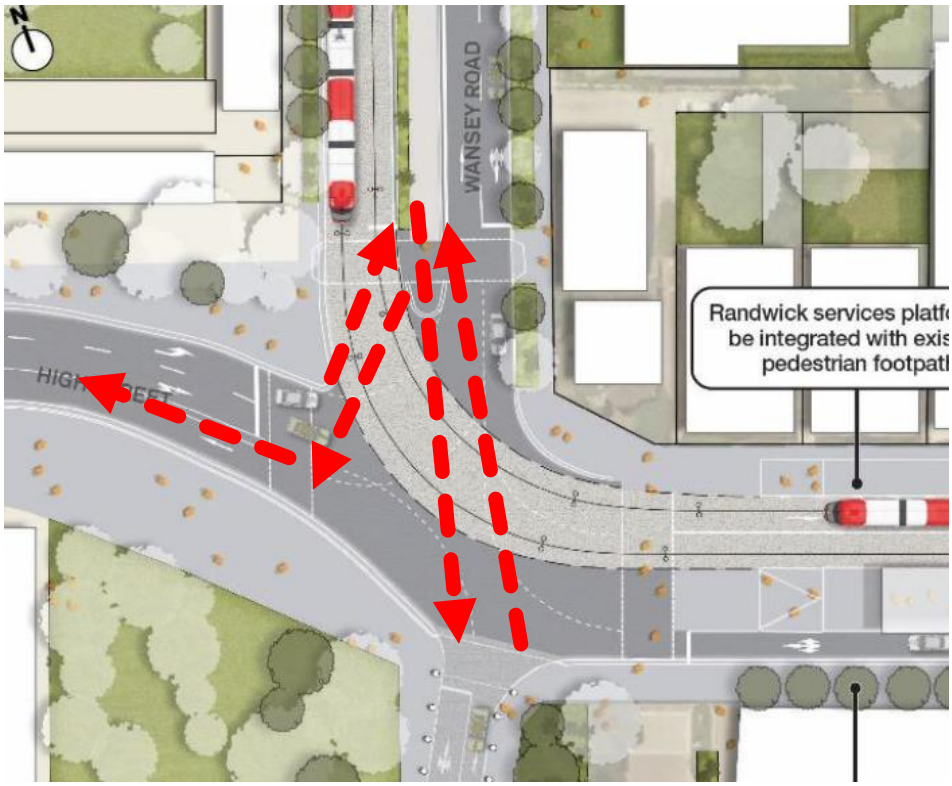

Figure 2 – Likely unsafe cyclist manoeuvres [*Source: TfNSW and UNSW*]

The UNSW proposal to fully pedestrianise High Street between Botany Street and Wansey Road is shown in **Figure 3** and indicates how pedestrian and cycle safety can be significantly improved by removing the west bound vehicle lane on the southern side of High Street.

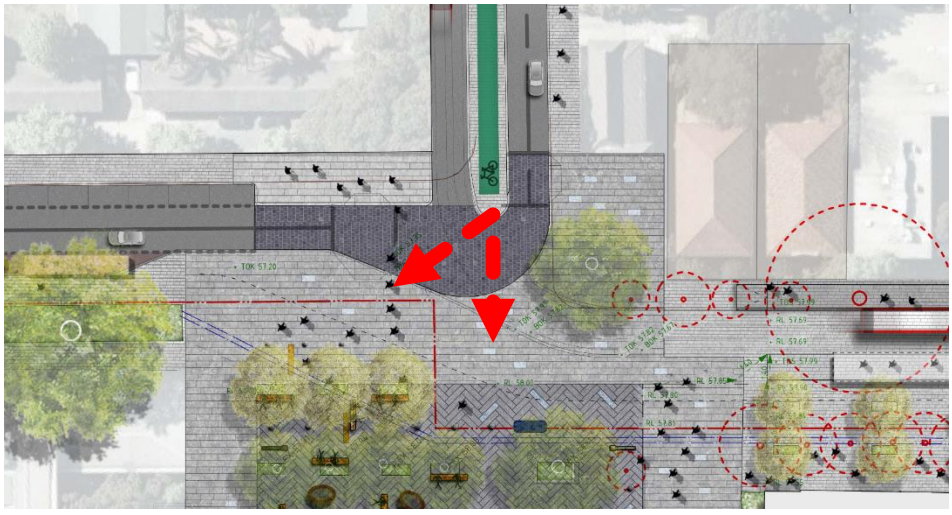

Figure 3 – Reduced risk cyclist manoeuvres at the corner of High Street and Wansey Road [*Source: UNSW*]

Additionally, Figure 2.8 of the Traffic Report identifies Botany Street as a key cycle route, but does not indicate any proposed connections between Botany Street and Wansey Road, nor where the shared path is to be constructed on Arthur Street.

UNSW requests that TfNSW and Randwick City Council (RCC) develop a clear connection between Wansey Road and Botany Street so that Cyclists do not use High Street lanes or the rail alignment, to access the campus or when intending to travel further west of the High Street Stop.

3.1.4 Signalised Intersections

UNSW supports the signalisation of intersections and pedestrians crossing locations surrounding the High Street stop, particular across High Street itself. However, as identified in Section 4.4.1 of the Traffic Report (Stop Accessibility), there is no detail provided regarding the signal phasing lengths.

The arrangement phasing and length of each crossing is an important aspect in the maintenance of pedestrian safety, reliability and frequency of LRV service and potential impacts to traffic and bus services operating along High Street. It is noted that given the proposed stop design, all passengers of LRV (alighting or boarding) will be required to cross the westbound lane of traffic. It is requested that the details of the signal phasing and lengths be provided to the DPE and UNSW by TfNSW.

As part of the proposed modification it is also noted that there will be an increase in the average delay time at the Wansey Road / High Street intersection. Again, raising the concern of the reliability and on-time running of LRVs to and from the High Street stop, as has been previous raised by UNSW.

The UNSW Gate 9 entrance vehicular crossing indicated Modification 4 documentation on High Street opposite the Wansey Road intersection as part of the is not preferred by UNSW. UNSW are exploring the opportunity to restrict traffic / vehicles further here at Gate 9 and potentially have an informal non-signalised entry into the campus. This should assist with reducing the phasing of the intersection and improving the reliability of LRV service.

As discussed in Section 4.4 of this submission, the UNSW proposal to fully pedestrianise High Street between Botany Street and Wansey Road indicates how pedestrian safety and on time running of LVRs can be significantly improved by removing the west bound vehicle lane on the southern side of High Street. The impact the traffic as a result of this scheme has also been considered by Traffix (**Attachment C**).

3.1.5 Arthur Street/Botany Street

Section 3.4.3 and Figure 3.7 of the Traffic Report (Appendix B) identifies that traffic signals are to be proposed generally at the intersection of Arthur Street and Botany Street. However, no detail is provided as to the arrangement or sequencing of this arrangement. As this is likely to be used by cyclists as a connection to Wansey Road, it is important that this information is provided as part of the consideration of the proposed Modification.

3.2 Risk of Noise, Vibration, EMI and RFI Impacts

3.2.1 Sensitive Environments on the Campus

Sensitive environments at UNSW include but are not limited to:

- Current and future research spaces, such as the Lowy Cancer Research Centre ($106m) and Wallace Wurth Building ($146m) (which front High Street), the Tyree Energy ($125m);
- Technologies Building which fronts Anzac Parade, the Mark Wainwright;
- Analytical Centre, the Newton Building and Old Main Building and research development sites such as the Materials Science and Engineering Building
- Stages 1 and 2 and the Biosciences Renewal Project Stages 1 and 2;
- Teaching and performance spaces in vicinity of the proposed stops and construction compound;
- Student accommodation along both Anzac Parade and High Street;
- Teaching and performance spaces at NIDA at Anzac Parade (and adjacent to the proposed construction compound location); and
- Other UNSW environments in the vicinity of the proposed stops.

The location of these sensitive receivers is shown below in Figure 4.

Additionally, some environments at the Kensington campus also have sensitive periods, such as exam, enrolment and census periods. Exams are typically held during the whole of June and whole of November and from 9am to 5pm throughout the day, enrolment periods are typically from mid-February to mid - March and mid-July to mid-August and census periods are generally from the beginning of April to mid-April and the beginning of September to mid-September.

Summer exams also occur in early to mid-February, typically from 9am to 4pm. Further, student vacation periods' acting as study time precedes each of the exam periods and are also considered sensitive periods. UNSW exams are also held at Randwick Racecourse which provides significant space during these periods.

To ensure normal business continuation for UNSW and its ability to provide teaching and research consistent with its obligations to its students and its charter, particularly in relation to exam conditions, careful consideration needs to be made to prevent construction impacts during these periods and to preserve consistent amenity.

We note any disruption to published and timetabled bus services during construction will also affect students' ability to arrive at the campus for classes and at exam locations.

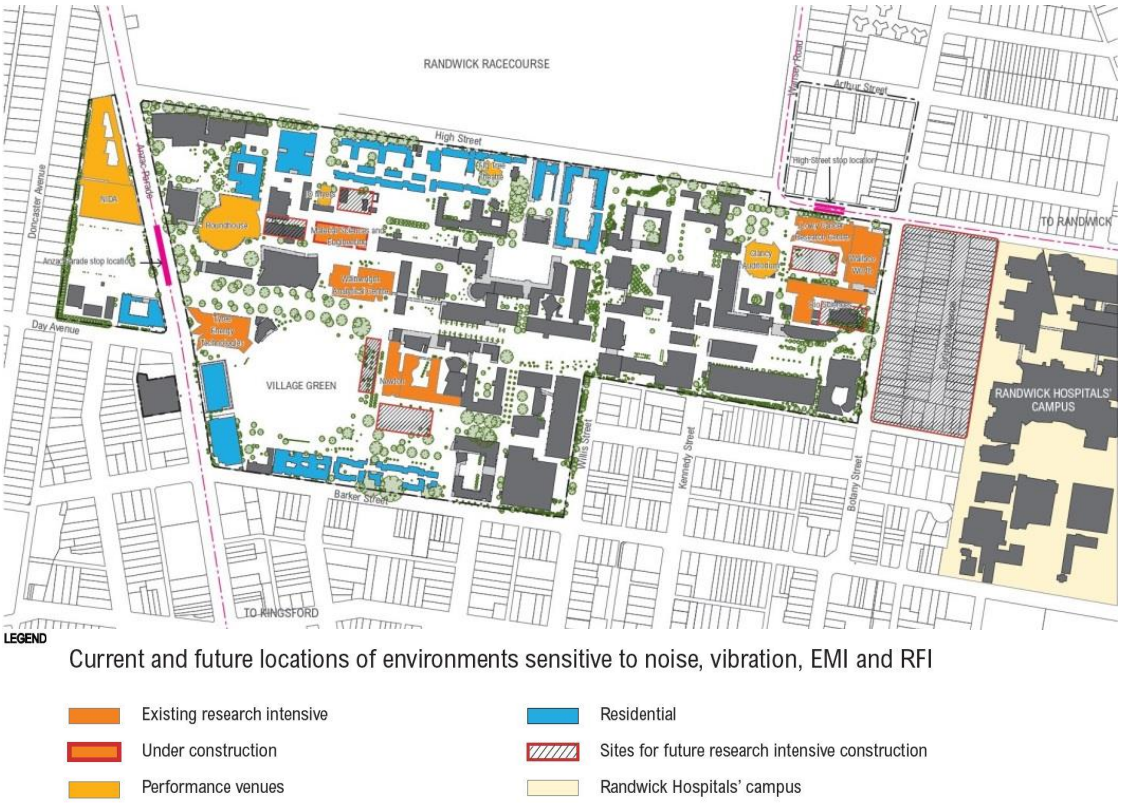

Figure 4 Current and future sensitive environments within the Campus *[Source: UNSW]*

3.2.2 Electromagnetic Interference (EMI) and Radio Frequency Interference (RFI)

Background to the University's Concerns

Electromagnetic interference (EMI) is disturbance that affects an electrical circuit due to either electromagnetic induction or electromagnetic radiation emitted from an external source. In this case, there is a known risk of EMI associated with Light Rail Vehicle operations manifesting as a time-varying DC magnetic field adjacent to the Light Rail alignment either caused by DC magnetic field emissions from the Light Rail Vehicle propulsion power system and/or by temporary shifts in the earth's static DC magnetic field caused by movement of LRVs.

As noted in previous submissions, there are specific examples where such EMI has caused negative impacts to the operation of advanced scientific and medical research equipment, affecting the ability to fulfil research missions at specialist university research facilities.

For UNSW one of the most relevant research facilities on campus is the recently constructed, purpose built Lowy Cancer Research Centre located immediately opposite, and within 25m of the proposed light rail stop on High Street.

Effect of the Proposed Modification

Whilst the repositioning of the High Street Stop away from UNSW sensitive receivers to reduce the risk of EMI impact and address requirements of SSI Approval Condition B18 are acknowledged, it is requested that the associated impacts of the modification need to be included in the Environment Assessment section of the Modifications Report, so that the impacts can be fully understood and assessed by UNSW.

Without certainty around these issues UNSW is subject to a significant level of risk in terms of its ability to ensure business continuance or fulfil research missions.

For example the Lowy Cancer Research Centre is provided in the short, medium and long term with a building at which the Centre can proceed with its research mission. If the research mission of the Lowy Cancer Research Centre is jeopardised, then it would have no alternative than to find an alternative location, resulting in UNSW having to relocate the entire Research Centre or losing the Research Centre entirely to another university.

Notwithstanding this, UNSW is an active supporter of the Project and is supportive of revised light rail stop design located on High Street. However, given the significance of these impacts it is suggested by UNSW that a precautionary approach to managing the issues from design through to operations would be prudent.

3.2.3 Noise and Vibration Impacts

UNSW reiterates the importance of SSI Approval Condition B17 and B18 included as part of the SSI approval. SSI Approval Condition B17 (and subsequently B18) requires that pre-operation monitoring is to be undertaken in consultation with UNSW. It is noted that these conditions have not yet been satisfied, nor information been provided to UNSW. Critically, the Noise and Vibration Report submitted with the Modification (Modification 4) does not make reference to or address SSI Approval Condition B17 or B18.

Resonate Acoustics has reviewed the proposed modification and have provided detailed comments at Attachment D of this submission. The key features relevant to the UNSW in this modification (from a vibration, noise and EMI perspective) are:

- Relocation of tracks further north than the approved location (further away from the Lowy Building)
- Likely reduction of noise, vibration and EMI from the proposed Light Rail

Whilst UNSW agrees with the comments in the main report (Page 24 of the main report) that the proposed modification (being the relocation of the stop and tracks) include, “potentially reduced conflict between the light rail and sensitive equipment utilised by the UNSW, in particular the Lowy Cancer Research Centre”, no further analysis of evidence has been carried out as part of the modification to support this assumption.

While the Lowy Building is stated in the reporting for Modification 4 as being a sensitive use, the Wallace Wurth Building is also sensitive (as identified in Figure 4) and consideration should be given to sensitive equipment such as Electron Microscopes and/or Animal Research Facilities, and the associated impact of the proposed on these.

3.3 Lack of Consultation with UNSW

As a key partner in the Project, UNSW seeks to maintain positive and meaningful engagement on the project in ensuring its objectives can be achieved.

UNSW has sought to work collaboratively in achieving optimal outcomes for the University and the wider community. Its strong desire is to assist in detailed design outcomes as put forward in this submission, particularly for light rail stops at its perimeter and those along the route that affect the daily operations of the campus.

Section 4.1 of the Modification 4 Main Report refers to consultation undertaken with relevant stakeholders. The issues raised in previous submissions and correspondence still have not been fully addressed. Many have still not been addressed as part of the Main Report as they relate to the UNSW, including:

- Safety and capacity;
- Platform crowding;
- High Street pedestrianisation; and
- Protection of underground utilities.

Despite UNSW covering these issues in detail in its previous EIS submissions and raising these issues at the meeting with TfNSW this still has not been fully addressed by TfNSW in Modification 4.

To achieve suitable and meaningful input into the detailed design phase, UNSW still seeks the preparation and implementation of a stakeholder liaison protocol and sign-off mechanism to address early works and main construction works to assist with input, feedback (and critically) notification of when certain works may be carried out. Particularly as UNSW owns and operates its own critical utilities, to date there has been no consideration or consultation with UNSW in respect these.

As noted, UNSW has numerous sensitive uses and critical functions for which significant disruptions (programmed or otherwise) may pose significant issues to those uses and the University in general. Accordingly, the potential staging of works, ensuring continuance of UNSW utilities and services during the works will be an important consideration and has a significant impact upon UNSW.

UNSW acknowledges that the detailed design process for the Project will continue after the EIS process has completed. UNSW proposes the following principles for the High Street (and Lower campus) stop designs and for the corridors on Anzac Parade (between High Street and Barker Street) and on High Street (between Wansey Road and Botany Street) as well as any services changes, utilities upgrades or relocations, bus stop relocations and other impacts on the Kensington campus;

- Notice period of 13 business days for comment on any design changes;
- A clear rationale for any design changes with reference to UNSW's priorities, the social impact objectives of the project and previous design drawings and concepts; and
- Engagement of an independent certifier should there be a dispute between TfNSW and UNSW on a design solution.

Lastly, UNSW are still seeking to be party to a Development Agreement as part of the Project and, as relevant, this will seek to address management and issues mitigation procedures and a range of development and construction matters in that agreement. However the Development Agreement is not progressing and the Project is progressing rapidly to an extent that UNSW still do not have certainty on key issues going forward.

3.4 High Street Traffic

As previously stated, UNSW supports the full closure (to vehicles) of east bound traffic lane on High Street between Wansey and Botany Streets.

Traffix have indicated that the predicted westbound traffic volumes are similar to those in the eastbound direction and therefore, the proposed removal of the High Street westbound lane between Botany Street and Wansey Road is feasible and should be considered further.

UNSW request TfNSW model the closure of the westbound traffic lane on High Street between Botany Street and Wansey Road to assess the potential impacts and look to pedestrianise the entire section.

Under the current proposal, UNSW recommends consideration be given to establishing a maximum speed limit 30 km/h for the westbound lane of traffic along High Street between Botany Street and Wansey Road. This will improve pedestrian safety for the pedestrian locations identified across High Street.

The UNSW Preferred Scheme (Attachment B) to fully remove the west bound vehicle lane on the southern side of High Street will improve pedestrian safety even further.

3.5 Utility Impact

UNSW notes that as part of Modification 4, and the delivery of the modified High Street stop, the existing Ausgrid substation kiosk currently located on High Street at the north east corner of the Campus is required to be relocated.

The new location of this substation may affect sensitive receivers or other sensitive uses in the area equipment due to the new proximity of the new substation and high voltage cables.

The Ausgrid substation should be relocated away from the UNSW campus perimeter on the other street frontages to minimise the risk to sensitive receivers, whilst still providing appropriate power supply to the proposal infrastructure.

4 Impacts to UNSW

4.1 High Street Stop Design

UNSW forms part of the University and Hospitals' Precinct, which is an important economic, education, health and social strategic asset for Sydney. Contextually it also plays a significant role in building and shaping communities, both locally and further afield and as such the campus should be welcoming and connected urban outcome which enhances amenity, functionality and identity within the public domain.

The proposed High Street stop design facilitates public domain upgrades and provides a cohesive urban interface between the Campus and Light Rail to enhance the streetscape and campus precinct to provide pedestrians with high-quality and safe urban environment appropriate for this world class education and health Precinct.

The proposed split platform design indicated in this modification is a superior design solution to the currently approved central platform design and the new proposal should be adopted and enhanced further. UNSW also believe the split platform option is more conducive and appropriate to the future pedestrianisation of High Street as required under SSI Approval Condition B43.

The proposed UNSW High Street stop design:

- locates the two light rail tracks as far north as possible away from the sensitive UNSW facilities such as the Lowy Cancer Research Centre to reduce the potential vibration and EMI impacts;
- allows for additional capacity at the rear of the platforms where they join with the adjacent footpaths, reducing the risk of passengers queueing on to the tracks;
- is also more compatible with the future pedestrianisation of High Street to create a layout similar to those proposed in the CBD; and allows for the best urban design outcome with the integration of the stops in to the surrounding areas;
- creates a larger construction zone clear of the UNSW property boundary, avoids the existing large and fragile water main other in-ground services located along the south side of High Street ,and maintains many existing mature trees within the Campus;
- removes direct access to/from High Street for the UNSW properties along the north side of High Street between Wansey Road and Botany Street; and
- reinstates property access via a new access lane on UNSW properties from Arthur Street to the rear of the High Street properties.

UNSW believe that this proposal can be collaboratively designed to deliver a well-considered and safe urban environment between the Project and UNSW properties. UNSW have prepared an enhanced version of the proposed scheme to depict how the proposed split platform design can be effectively integrated with the stop precinct.

A summary of these key design enhancements and safety principles are outlined below and attached a copy of the Enhanced Scheme at Attachment A.

This Preferred Scheme is further expanded in Section 4.4 'UNSW Preferred Scheme', demonstrating our preferred scheme for the full pedestrianisation of High Street between Botany Street and Wansey Road.

4.1.1 Proposed Platform Capacities

UNSW have previously raised serious concerns around the safety implications of the approved central platform design. The currently approved platform width of only some 6.0m in total has limited ability to improve safety by increasing the width and capacity in the future.

The proposed split platform design increases the total platform width to at least some 7.3m in total over two platforms. This proposal also has the benefit of utilising the adjoining footpath at the rear of the

northern platform for any capacity peaks or overflow, something that the central platform could never achieve. However, the exact widths of platforms and design details need further consideration. Traffix Stop capacity calculations have been undertaken based on information presented in Altrac's Pedestrian Modelling Design report from June 2015 provided to UNSW.

Using the same methodology (shown below), it is considered that:

- Southbound stop (toward Randwick Terminus) – proposed 3.2m + 1.5m footpath is adequate for BOARDING passengers (design capacity of 500 per hour) to achieve Level of Service (LOS C).
- Southbound stop (toward Randwick Terminus) – proposed 3.2m + 1.5m footpath is NOT adequate for ALIGHTING passengers (design capacity of 3,000 per hour) to achieve LOS C, but achieves LOS D which is considered appropriate for short amount of time when large numbers of alighting passengers get off LRV.
- Northbound stop (toward CBD) – proposed 4.1m side platform is NOT adequate for BOARDING passengers (design capacity of 3,000 per hour) to achieve LOS C, but achieves LOS D. Based on the calculations, a stop of 6.0m width would be required to achieve LOS C. NB: The Altrac report considered a 4.65m wide central island stop was adequate.
- Northbound stop (toward CBD) – proposed 4.1m side platform is adequate for ALIGHTING passengers (design capacity of 500 per hour) to achieve LOS C.

In consideration of the above it is requested that TfNSW appropriately confirm the platform capacities and set out of the proposed stop layout cross section to the DPE and UNSW prior to the finalisation of the assessment.

4.1.2 UNSW Gate 9 Entrance

The signalised UNSW Gate 9 entrance with a roadway vehicular crossing into campus shown on High Street opposite Wansey Road intersection as indicated in Modification 4 is not preferred. As shown in the Enhanced Scheme (**Attachment A**), UNSW proposes a less formal crossing as part of our proposed campus urban design solution at the Project interface. UNSW are exploring the opportunity to restrict traffic / vehicles further at Gate 9 and potentially have a non-signalised entry into the campus.

It is expected that this should assist with reducing the phasing of the intersection and improving the reliability of service. This crossing design and location should be coordinated and finalised with UNSW.

4.1.3 Footpath Materials selection

Paving materials on the High Street stop platform and around the High Street stop between Botany Street and Wansey Road should be a high-quality pedestrian-grade granite paving, to reflect the urban significance as a gateway to the learning and employment hub of the University and Hospitals Precinct.

The UNSW Enhanced Scheme (**Attachment A**) proposes high-quality pedestrian-grade granite to the RCC domain as well as the Gate 9 forecourt creating a unique urban identity and a consistent public expression throughout the precinct

4.1.4 Treatment at UNSW Campus boundary

The UNSW Enhanced Scheme (**Attachment A**) proposes the removal of the existing boundary fencing and plantings as part of the footpath extension works at the south western edge of the High Street Stop (northern boundary of the Campus). The new interface with the Campus is to be seamless and permeable with a blurred boundary edge. Elements provided by the Project such as bus stops, bicycle racks, bins, railings, signage etc are to be rationalised and considered in conjunction with existing and future UNSW infrastructure proposals.

The zone between the boundary and UNSW buildings and forecourts is to be paved in similar materials as the platform and footpath to achieve a well-integrated urban design outcome. Therefore to achieve this in a timely cost effective manner the Project should immediately introduce the use of agreed high-quality pedestrian-grade granite to these areas as part of the current program.

4.1.5 Northern platform interface with existing High Street Properties

The private land between the northern High Street Stop platform / footpath edge and the private properties immediately to the north should be fully considered and neatly integrated to create quality urban design outcomes, with appropriate levels for access, and falls for stormwater. Details of the final design interface in this area should be provided to UNSW and DPE.

4.1.6 Southern platform infrastructure design

The proposed southern platform will have a significant number of passengers waiting for long periods on a daily basis. Presently, Modification 4 indicates that only a single sided canopy with supporting posts will be provided.

However, UNSW needs to ensure that full weather protection is adequately addressed, particularly given the geographic location of the UNSW Kensington Campus on the east coast of Sydney. Any proposed canopy should cover the entire length of the platform and the current Modification documentation does not indicate this.

The weather protection solution envisaged by UNSW in this location is a glazed vertical / full height screen between the canopy posts that covers the entire length of the platform.

The glazed weather protection screen can also act as an effective safety barrier between the platform and the proposed west bound vehicle lane. Well-considered integration of weather protection and safety barriers within the stop design is key to delivering a world class urban domain outcome.

The safety railings that run beyond the platforms also need to be well integrated into the overall safety and stop design considerations to avoid retrofitting of safety elements post completion and delivering poor urban outcomes.

4.2 Tree retention

UNSW supports the retention of trees wherever possible as part of the construction and delivery of the CSLER.

The retention of trees, particularly along the southern side of High Street (in-front of the Lowy Cancer Research Facility) is considered to be of high priority and are not required to be removed in order to deliver the revised High Street stop design. The trees along this boundary are identified within the Randwick Comprehensive Development Control Plan 2013 as being High Retention Priority as shown below in **Figure 5**. As such, it is considered important that these are retained.

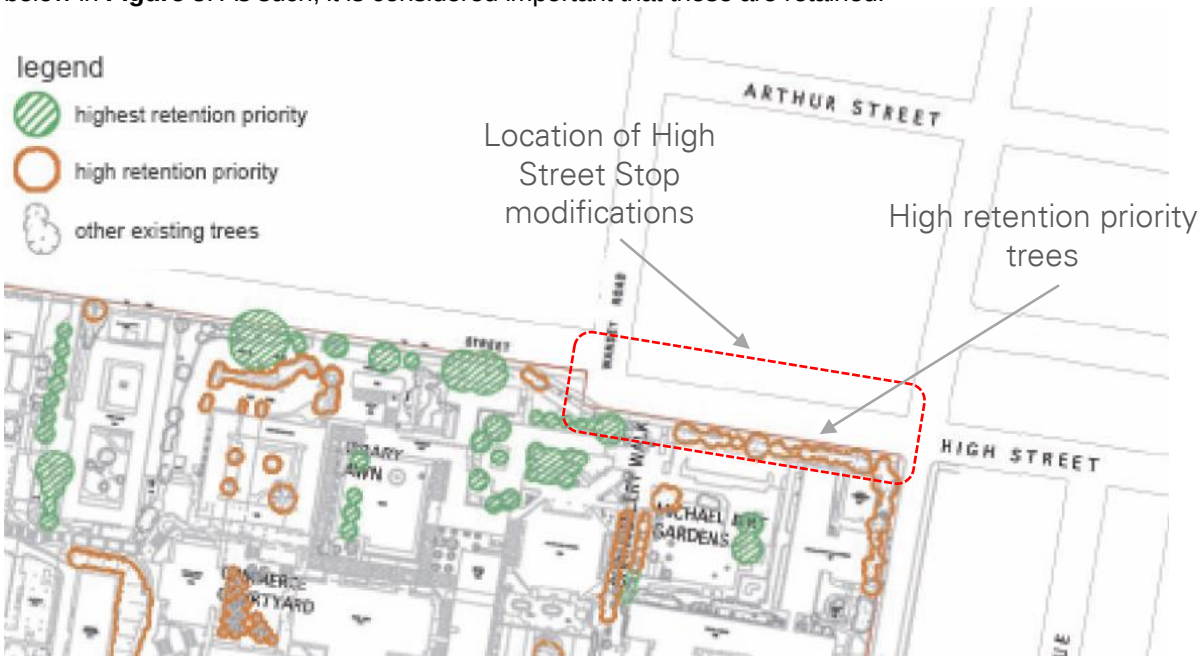

Figure 5 – Randwick Comprehensive Development Control Plan 2012 – Section E2 - Figure 5.6a [*Source: RCC*]

4.2.1 New bus stop

The existing UNSW bus stop currently located on the southern side of High Street on UNSW land (adjacent the Lowy Cancer Research Building) will need to be relocated as part of the proposed delivery of the High Street Stop (as shown on the Enhanced Scheme (Attachment A). The proposed location for this stop is on the southern side of High Street, adjacent to the Chancellery Building near Gate 8 (approximately 150m west of the current location).

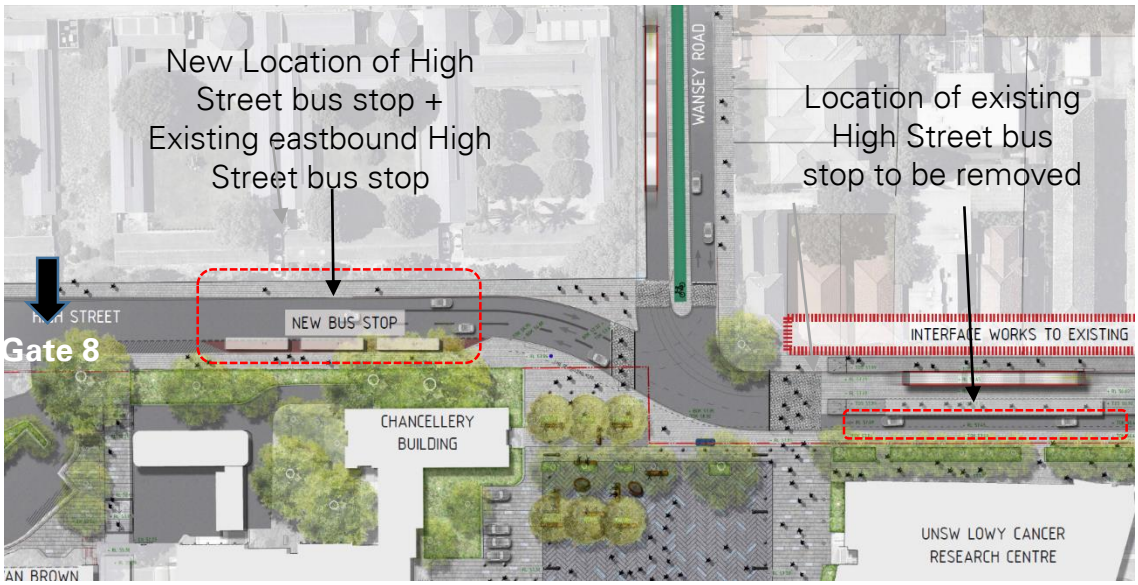

Figure 6 – Existing and proposed bus stop locations [*Source: UNSW*]

UNSW own the existing bus shelters and they are located on UNSW land. The new bus stop shelters also need to remain under UNSW ownership and be constructed on UNSW land. The bus stops are to be appropriately illuminated at night for safety to UNSW requirements and connected into the UNSW lighting system. It is noted that this design is separate to any RCC street lighting requirements.

The proposed new bus stop, location, shelter design, size, and lighting needs to be developed in further detail with careful consideration of the existing Gate 8 bus stop on the opposite (northern) side of High Street. Consideration also needs to extend to the existing pedestrian crossing and Gate 8 entry pedestrians/vehicle entry to the Campus.

The final bus stop and shelter design must be submitted for UNSW approval well before the existing bus stops are removed or relocated.

4.3 Utility Impact

UNSW notes that as part of this modification, and the delivery of the High Street stop, the existing Ausgrid substation kiosk currently located on High Street at the north east corner of the Campus is required to be relocated.

The new location of this substation may affect sensitive receivers or other sensitive uses in the area equipment due to the new proximity of the new substation and High Voltage Cables.

The most appropriate location for this Ausgrid substation is well away from the UNSW campus on the other street frontages to minimise the risk to sensitive receivers.

4.4 Preferred Scheme - Fully Pedestrianised Stop Design

As outlined earlier, the proposed split platform option, as proposed in this modification, is more conducive to the full pedestrianisation of High Street between Botany Street and Wansey Road as required under SSI Approval Condition B43. This design arrangement is preferred and supported by UNSW.

The attached UNSW Preferred Scheme (Attachment B) indicates how a fully pedestrianised stop can readily be achieved through the removal the west bound vehicle lane on the southern side of High Street, therefore delivering a safe and welcoming public domain for all users, this initiative should be implemented now rather than later.

The review of modifications report provided by Traffix (Attachment C) indicates that the nature of Arthur Street will change as part of the Modified Project (Modification 4), with additional predicted westbound traffic volumes similar to those expected in the eastbound direction. As such, the proposed removal of the High Street westbound lane between Botany Street and Wansey Road is feasible and should be considered further by TfNSW

By adopting this Preferred Scheme UNSW will be a welcoming and connected urban destination that is enhanced by the pedestrian conducive public domain.

4.5 Other UNSW Properties

The UNSW owns a majority of the properties in the block bounded by High Street, Wansey Road, Arthur Street and Botany Street (north of High Street), including the UNSW owned and operated Tiggers Honeypot childcare centre and the vacant land in the middle of the block (see Figure 1) – known as 22-24 Botany Street.

It is noted that whilst the vacant land in behind the UNSW owned and operated childcare centre (22-24 Botany Street) is currently informally utilised by the existing childcare centre, however is outside of the licensed area. Critically, therefore, the proposed arrangement at the rear of these properties does not reduce any formal open green space of the child care centre.

UNSW support in principle the change in access to the affected High Street properties as a result of the modification, as well as the removal of any parking in front of our properties, however the design development of the new laneway and reinstatement of residual areas will be subject to UNSW consultation and approval.

Minimising the impact and land use of the new laneway is important, to ensure the amenity of the existing uses are retained as a result of the proposed modification.

Property Access Changes

UNSW supports the provision of alternative access to the properties affected by the modification by allowing the use of UNSW owned land to create the new access via Arthur Street.

The series of alternatives access scenarios assessed and referred to in the modification report were undertaken without full engagement of UNSW and the avlidity of the current proposal as shown is questioned. The proposal would benefit from further consideration of the following key principles:

<u>Confirmation of access and design vehicle assumptions</u>

- Ensure garbage collection occurs at existing street and road frontages only.
- Eliminates the need for garbage trucks to enter and reverse in the quieter residential areas.
- Restrict furniture removal vehicle size at Arthur street entry
- Reduce the access lane width as well as the need for the large hammerhead turning area, and hence reduce UNSW land take and interruption to existing infrastructure and prevailing environment.
- Gains support from RCC

Remove vehicle access requirement to UNSW property at 46 High Street

- Encourages the use of public transport for residents
- Residents are mostly students on short term leases and generally don't have cars
- Reduce the width of lane way that extends to the east providing pedestrian access only.
- Reduces the extent of excavation and retaining walls.
- Minimises the disruption the existing childcare centre during construction and on completion.

Consider the functionality of the informal open space adjacent to the Childcare

- Safety of children and staff who at times utilise the informal garden.

Reinstatement

The Project will need to reinstate and remediate the affected areas to UNSW approval, particularly the informal and formal open areas of the Childcare Centre (rear of 22-24 Botany Street). The scope of this work shall generally cover but not be limited to:

- replace existing structures, shading and other elements to create the new informal open space similar to existing;
- replace any lost trees with similar good sized mature trees;
- reinstate the garden areas similar to existing; and
- reinstate safe secure fencing similar to existing.

Utilities and Services

A full stormwater assessment and design will need to be undertaken not only for any proposed laneway for the Project but also to suit future UNSW master planning and development proposals. Future proofing and minimising development impost is critical to UNSW.

As UNSW own a majority of the properties on all sides of the proposed laneway it would be prudent to again future proof UNSW development opportunities by installing provisional service conduits under the laneway to UNSW approval.

Construction hours

The Project currently has approval under SSI Approval Condition B2 and B22 for construction hours being generally:

a) Weekdays 6am to 6pm
b) Saturdays 8am to 5pm
c) Sundays / Public Holidays, no work permitted
d) However where construction vehicle routes directly pass schools or childcare centres, the applicant shall restrict heavy vehicle movements where reasonable and feasible between 8am and 930am, and between 230pm and 4pm Monday to Friday, during the school term.

The approved construction hours corresponds almost exactly with the operating hours of the UNSW Childcare Centre, being 8:15am to 6:00pm on weekdays.

The restriction under SSI Approval Condition B22 is limiting only construction vehicle activity and is not appropriate or fully comprehensive for the proposal as there will be other environmental impacts on the UNSW Childcare Centre. Similar impacts as envisaged by SSI Approval Condition B7 need to be addressed here.

The current approved construction hours introduces WHS risks to staff and children at the UNSW Childcare Centre and given much of the day for children is spent outside in the immediate vicinity of the proposed construction zones, these hours need to be modified.

UNSW requests that an alternative construction hours be approved specifically for the proposed laneway works to reduce the environmental impacts of the Project.

UNSW recommend that construction hours within the Arthur Street laneway area be stipulated as being:

a) Weekdays 6am to 6pm
b) Saturdays 8am to 5pm
c) Sundays / Public Holidays, no work permitted
d) Restrictions currently under Condition B7 and B22 should be limited to only 8am to 5pm on Saturdays.

Subdivision and Title matters

UNSW requests that a draft plan of subdivision be prepared that full reflects the proposal (and that on the lower campus) so that we can appreciate what land is required to deliver the Project before all proposals are agreed, clarity on this is essential to the University.

5 Issues Remaining for UNSW (Outside of the Modifications Report)

5.1 Construction and Post Construction Impacts

This response is driven predominantly by UNSW's desire to see a safe and accessible environment at the campus for its students and staff and one which achieves and maintains a high level of amenity within and at the edges of the campus. To that end, these key concerns remain those tied to broadly meeting the project's objectives from a public benefit standpoint, but also the ability for UNSW to continue to be able to provide a learning, teaching, and research environment commensurate with its place as one of Australia's and the Asia-Pacific Region's premier universities, during both construction and operation.

It is essential that UNSW be able to operate as normally as possible during the Project construction works period. Maintaining traffic and transport access to the campus is fundamental to ongoing operations not being detrimentally affected, and in turn affecting the University's reputation and standing, particularly with student intake and its ability to maintain a competitive business edge and attract not only students but the best staff and key supporters of education, research, technology, and innovation.

5.2 Student and Staff Access

In addition to the 26,000 persons arriving by public transport, UNSW currently has approximately 7,000 staff and students arriving by private vehicle, 5,400 walking and more than 1,800 cycling to campus each day.

Majority of the arriving at UNSW travel from Central Station and the City, therefore any disruptive works along this route to and from UNSW has the potential to impact our business and operations.

In order to continue operations, sufficient access points and capacity for each of these modes needs to be managed and maintained throughout construction and beyond in a safe and efficient manner.

Any changes to arrangements need to be coordinated and communicated well in advance to avoid confusion and disruption to UNSW business and operations.

5.3 Operations and Delivery

Daily campus delivery requirements and campus specific construction traffic must also be considered and managed during construction and delivery phases of the Project.

Ongoing access for deliveries is essential for normal operations to continue. Access to the University is limited to a number of entry/exit points. All access points are likely to be affected by the construction works in one way or another, and especially so, dependent upon the size of the delivery vehicle.

Certain access points presently cannot cater for oversized vehicles, whereas other access points can. Should any one Gate be affected for an extended duration (including the route to that Gate) severe impacts to supplies of materials and other important deliveries is likely to result. Importantly, not all loading docks or parts of the campus are readily accessible from other parts of the campus.

Some research activities rely on specialised gas and other services for their operation. Due to the infrastructure involved, use of alternative gates and access points may not be possible. Regular access for these activities will need to be maintained throughout the construction process.

5.4 UNSW Construction Program

The UNSW Kensington Campus has a building replacement cost value of approximately $2.5bn. With ageing built infrastructure the university currently spends in the order of $200m a year on new and existing facilities.

At present there are two major projects underway on the Kensington Campus:

- Biological Sciences Project (completion in2017) - $165m and;
- Science Engineering Project (completion March 2015) - $204m.

There are firm plans to commence many other projects over the next few years, refer to the table below.

In December 2015 the University Council approved a borrowing strategy and capital program that will see the University continue to undertake a similar level of activity throughout the period of the construction of the Project. The capital works in the following table (Table 2) are funded from University reserves and the borrowing strategy.

Table 1 – UNSW Capital Development Program – Short term

Project	Budget	Construction Period	Construction Access
Biosciences Phase 1	$165m	2014 - 2017	Gate 11 Botany Street
Biosciences Phase 2	$120m	2017 - 2019	Gate 11 Botany Street
Materials Science Lab Fit Out	$38m	2016 - 2018	Gate 2 High Street
Chemical Sciences Refit	$63m	2016 - 2017	Gate 2 High Street
Electrical Engineering Refit	$100m	2016 - 2018	Gate 2 High Street
Science Engineering	$204m	2015 - 2019	Gate 2 High Street
Chemical Sciences Refit	$63m	2016 - 2017	Gate 2 High Street
Light Rail Interface	$28m	2016 - 2018	Gate 11 Botany St, Gate 2 High Street
Roundhouse Refurbishment	$25m	2015 - 2019	Gate 2 High Street
Squarehouse / Blockhouse	$48m	2017 - 2018	Gate 2 High Street

As with routine deliveries, only certain access points and Gates will be able to directly serve individual construction sites. Access to some of these gates are directly affected by the timing, duration and location of the Project.

To assist in resolving routine and construction access issues and likely impacts, UNSW seeks to work proactively with TfNSW to formulate a construction program that is mutually acceptable to both parties and considers the economic and business impacts of each project or entity.

5.5 Frequency of Service

UNSW has repeatedly raised the concerns of passenger and pedestrian safety at the UNSW stops in previous submissions. The previously approved increase in the capacity of the LRV, in conjunction with the reduction in service frequency, particularly during peak hours, is considered to be a significant enough reason to review the capacity, operation and passenger safety of each of the UNSW stops, particularly for the revised stop design of High Street.

UNSW continues to be concerned with the service frequency (and capacity of the LRV) on the stop operation, capacity and safety have not been adequately addressed. UNSW's estimated patronage (that includes only UNSW staff and students) using 2014 campus survey predicts light rail passenger volumes (by 2021) at the UNSW Stops (Anzac Parade and High Street) will be much higher than TfNSW's passenger volumes (for 2038 adopted by TfNSW in previous Modification 1 – December 2014.

A review of the TfNSW patronage data has been undertaken by Traffix Group, using the current UNSW 2014 Travel Survey and Campus Counts, which were not available the time of Planning Approval to the Project and relevant Modification 1 which has not since been revised (Attachment E).

UNSW's 2014 campus survey indicates that 26,000 (or 60.1%) staff and students currently use public transport to access the campus, this is a 10.6% increase since 2007. This, coupled with an increase in campus population of 41% during the same period, indicates the significant role that the light rail will

provide for access to the campus. Using 2014 figures, it is predicated that approximately 21,000 (or 49%) UNSW staff and students will use the light rail at opening (in 20121).

The UNSW 2014 Travel Survey was independently conducted over a three-week period in April 2014 and received a significant number of responses from approximately 2,500 staff and 7,700 students. The responses represented 19.6% of staff and students attending the campus.

In 2014, simultaneously with the Travel Survey, the University conducted a detailed survey count of movements around the entire campus perimeter during a typical semester's week (Campus Counts). The aim was to obtain more specific data of where and how many pedestrians, cars, bicycles, motorbikes and commercial vehicles arrived and departed from, the entire campus. All arrival and departure movements at strategic points on the campus perimeter were counted in 15 minute intervals over a 24 hours period for 7 days – Friday 4th April to Thursday 11th April.

This updated data has been used to predict expected usage of the UNSW High Street and Anzac Parade stops. The graphs below (Figures 7, 8 and 9) present the predicted boarding and alighting at the stops (for 2014). Key findings of 2014 figures are also provided in Table 2 below.

Table 2 – Expected usage of UNSW stops - 2014

2014	Type	Maximum 15 Min Volume	Maximum Hourly Volume	Daily Volume
Anzac Parade	Alighting	930	2,781	12,516
	boarding	1,013	2,719	14,607
High Street	Alighting	569	1,830	8,124
	boarding	238	584	3,792
Total (of both stops)	Alighting	1,437	4,611	20,640
	boarding	1,166	3,187	18,399

Adopting a conservative 2% p.a. growth rate for the campus population (which has grown at 5% p.a. since 2007) and retaining the existing proportion of public transport users (60%), light rail patronage for the campus stops will increase by 15% by 2021. Assuming a peak hour capacity (at opening in 2021) of 3,495 patrons per hour (7.5 LRVs per hour x 466 patrons per LRV) per line, UNSW passengers will utilise up to 90% (3,200 passengers) of the services on opening in 2021 on the Kingsford branch line and up to 76% of the capacity (5,300 passengers) on both lines that service UNSW.

Importantly, all the above figures are for UNSW staff and students only. Additional passengers already on each LRV will reduce their capacity to take on passengers at the UNSW stops or be used by UNSW passengers to get to the campus. Passengers from the surrounding areas using the UNSW stops will increase crowding on the stops and at the access points to the stops.

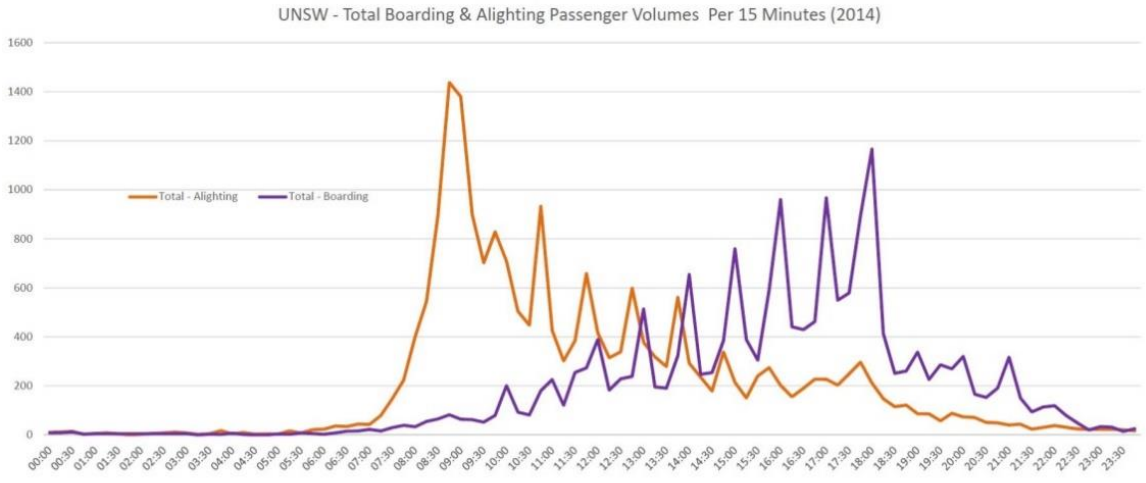

Figure 7 – Total boarding and alighting passenger volumes per 15 min (2014) [*Source: Traffix*]

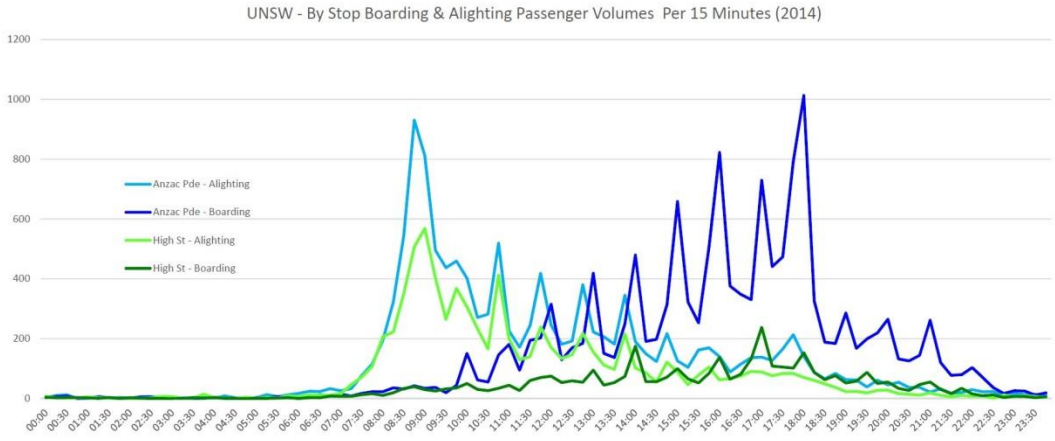

Figure 8 – By Stop boarding and alighting passengers per 15min (2014) [*Source: Traffix*]

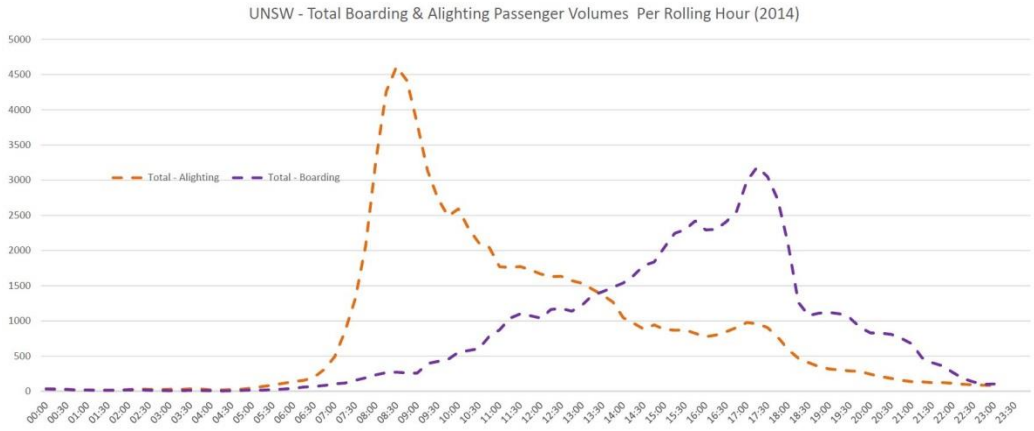

Figure 9 – Total boarding and alighting passengers per rolling hour (2014) *[Source: Traffix]*

UNSW is concerned that although additional services may be provided to cater for the additional growth in patronage over time, the size of the stops have not been designed to cater for this expected growth.

In preparing this submission, the discussions and consideration of UNSW in the revision of the High Street Stop design is noted, including:

- incorporating the morning peak disembarking platform into the northern pedestrian footpath, removing the need for large numbers of customers to wait on the island platform before crossing High Street to the UNSW campus
- providing segregated boarding and alighting allowing for flexibility to accommodate higher volumes of customers; and
- providing increased platform widths for afternoon peak.

UNSW agrees that the revised stop design will improve capacity and safety and the High Street stop, when compared to the current approved design. However, as noted earlier, an ongoing concern exists in relation to the capacity of the service. Without the final detail of the identified opportunities above, a determination on the appropriateness of the proposal is not possible.

The approved change in LRV capacity (from 300 to 466) and change in peak hour service frequency (from 10 vehicles per hour to less than 8vph at opening (2021)) (see Figure 10) will significantly affect the patronage of the UNSW stops at High Street (and Anzac Parade). Importantly, further consideration of the impacts of the proposed modification on the operation of the two stops (generally improvements), particularly with regard to platform capacity, level of service, and pedestrian safety.

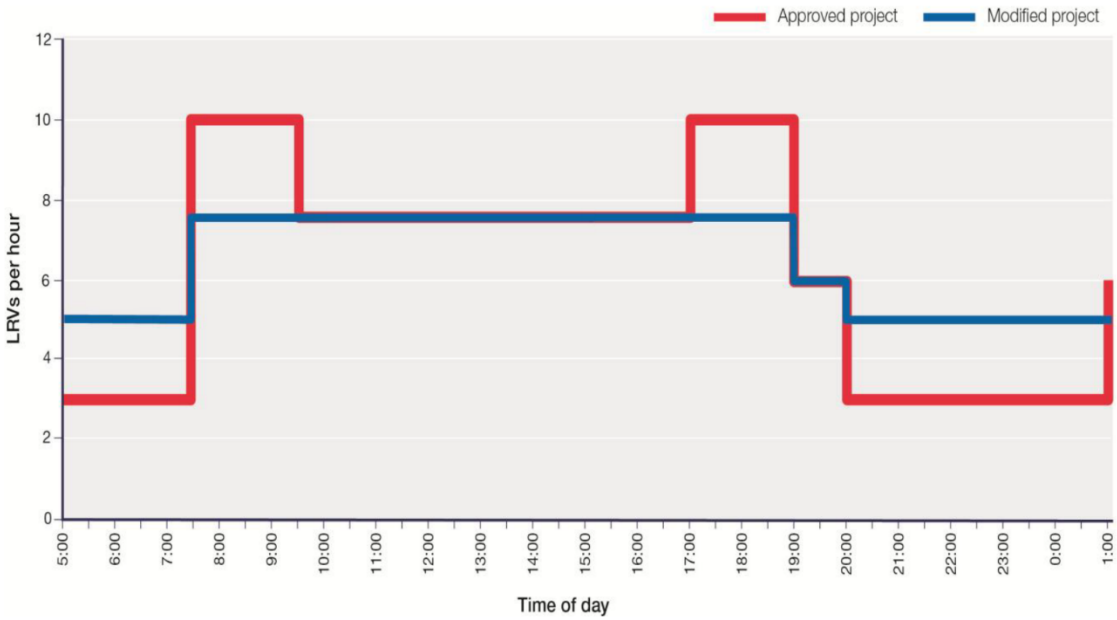

Figure 10 – Operating Frequency at opening year – Randwick and Kingsford Lines [*Source: TfNSW*]

Based on the detail provided by TfNSW, it is understood that the Project will commence operations in 2019, while the future service frequencies may not be implemented until 2029, ten years after opening if at all.

The TfNSW Additional Information Report (dated June 2014) provided a summary of predicted boardings and alightings at the UNSW stops. At the time, this information was analysed by Traffix Group and compared against the numbers provided within the recent 2014 Travel Survey. The analysis highlights that in the morning peak hour (8am – 9am (AM)):

- The proportion of passengers from other areas is between 21% and 91% of the total use of the UNSW stops. Therefore the UNSW analysis using only UNSW passengers is quite conservative;
- UNSW's predicted number of UNSW passengers in 2014 (between 8-9am) is significantly higher than TfNSW's predicted number of UNSW passengers in 2036 (AM) for the Anzac Parade Stop;
- UNSW's predicted number of UNSW passengers in 2021 (between 8-9am) is expected to be 15% higher than the current 2014 (8-9am) numbers; and
- The 15 years of growth from 2021 to 2036 has not been calculated by UNSW due to too many uncertainties, but it is considered that the passenger numbers will be significantly larger.

Based on the morning analysis, Traffix expects that for the afternoon (PM) peak there will be similar discrepancies.

6 Conclusion

UNSW is a significant contributor to the ongoing success of the Sydney public transport network and the success of the Project, bringing some 26,000 passengers to the Kensington campus on weekdays, including 17,000 alone on buses between Central and the campus. Additional to this are the visitors to campus for special events both during the week and at weekends.

To that end alone it is Sydney Buses biggest single customer destination. This is expected to continue to grow as UNSW itself grows. Indeed, UNSW provides "special event" status to the network on a twice daily basis. The original EIS has noted this in nominating the two proposed UNSW stops as the 4th and 5th busiest in the Project, and the two busiest on the south-eastern corridors. This UNSW daily passenger load clearly provides the single greatest driver of the benefit case for the light rail.

According to Transport for NSW's early analysis of Opal card data, four of the six busiest bus trips in Sydney are between Central and the University of NSW, with the busiest being between Eddy Avenue and UNSW in the morning peak

As a key partner in the Project UNSW will continue to liaise with TfNSW (and appointed contractor) to clarify and resolve any issues raised in this submission and to find appropriate outcomes that enhance the facilitation and delivery of the light rail network. UNSW has sought to work collaboratively with TfNSW in achieving optimal outcomes for the UNSW and the wider community.

This submission addresses remaining concerns arising from both the Infrastructure Approval and Modifications Report relating to the works proposed as part of Modification 4, including the redesign of the High Street stop, as well as a range of remaining construction and operational issues.

The key issues arising from the proposed modification are:

- potential impacts to pedestrian and motorist safety
- the risk of noise, vibration, electromagnetic interference (EMI) and radio frequency interference (RFI) impacts upon sensitive teaching, research and other University environments during construction and operation of the light rail as a result of the proposed amendments
- lack of consultation with UNSW
- impact to traffic on surrounding street, particularly along High Street as a result of the proposed modification; and
- impact of the proposed stop design on UNSW properties

It is essential that UNSW ensures its typical daily operations can continue as unaffected as possible in recognition of the importance the University plays in the Precinct and to the economy in general. Significant detrimental effects have the potential to introduce wider-ranging and longer-term impacts upon the Precinct's and University's viability, amenity, character, reputation, business continuity and capacity and capability for the future.

UNSW looks forward to the opportunity to provide further comment on any further amendments and welcomes the opportunity to meet with TfNSW and the Department of Planning and Environment to discuss anything contained within this submission.