

## **CBD and South East Light Rail EIS submission 9 December 2013**

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### **A better way for the Surry Hills environment**

My concerns about the Environmental Impact Statement for the CBD and South East Light Rail project as exhibited in November/December 2013 include the route proposed through Surry Hills and across Moore Park West, and the **extraordinarily large size of the Light Rail Vehicles (LRVs) proposed.**

#### **1. The Problems**

The surface route from Eddy Ave., along Chalmers St., Devonshire St., across South Dowling St and the Eastern Distributor (by bridge) and across Moore Park West by tunnel is inappropriate because:

- It will incur massive dislocation to the existing large, diverse and vibrant residential (in excess of 1,000 units on Devonshire St alone) and business community, both in the construction phase, but more importantly, during the whole operational life of the Light Rail. **The part of the route, between Central and the Moore Park Precinct, will be the most used section of the whole Light Rail,** with peak LRV traffic estimated to be at least every two minutes each way. Services will operate every day for at least 20 hours, from 5 a.m. until 1 a.m. ( with LRVs also passing during the other four hours, between 1 a.m. and 5 a.m. for operational positioning purposes).
- According to TfNSW, noise level heard by residents with houses on the street could be as high as 80 dBA , which is totally unacceptable .At the same time, they also would be subjected to vibration. A single pass- by event of two LRVs could last 8 seconds for 45m vehicles travelling at 40 kph.
- **Such a high speed (40 kph) on a street the width and residential density of Devonshire St. is totally unacceptable.** (Compare Campbell St in the CBD, with approximately similar width, but no residential population, where the existing speed limit for the Inner West light rail - with more than 30% smaller LRVs - **is 20 kph.** )
- LRVs, 45 m. long, will be more than 50% longer than the LRVs on the existing Inner West route ( those trams, 29 m. long) and two and a half times longer than the existing red bendy buses now operating in Sydney. **They will be by far the largest trams ever to operate in Australia.** They are proposed to move large numbers during peaks, but are only appropriate on dedicated rights of way, not on residential streets. TfNSW is even proposing “double trams” -,two, joined together (ie 90 m. long) - to move large crowds to and from events at the Moore Park events precinct. **This is totally unacceptable on an inner city residential street of the width of Devonshire St..**

- Residential, visitor and through north-south traffic ( and vice versa) by car, bicycle walking will be greatly disrupted by LRVs passing intersections, especially at Elizabeth, Crown and Bourke streets, particularly at peaks.. Tram priority is assumed because of the high priority placed on the speed of service according to TfNSW requirements(which include placement of traffic lights at intersections on Devonshire St. to assure priority ) Passage of these large trams across an intersection could take up to 30 seconds.( allowing for slowing down and safety requirements). Disruption will be exacerbated, as housing development to the south (particularly multi-storey apartment blocks) will increase greatly in southern areas of the City of Sydney and through to Botany LGA over the next 10 years.
- **The above becomes a major planning co-ordination issue, particularly as it appears that TfNSW has not consulted adequately with the Departments of Roads, or Planning. Need to consider the total implications.**
- Tunnelling in Moore Park will be disruptive to the many users of the park for recreation and sports. If it goes ahead, it should be completed as quickly as possible. After completion, great care will be needed to minimise intrusion on park users and adequate safety measures to protect users need to be put in place in the most sensitive way possible.
- The proposed bridge from Surry Hills to Moore Park West, across South Dowling St. and the Eastern Distributor will be an unsightly eyesore.
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## **2. An alternative to solve these problems**

Originally, the City of Sydney proposed that the route through Surry Hills be underground, as the best option for all concerned. This was rejected by the Government for “cost reasons”.

However, costs should be considered , not only as construction costs, but also in the context of long term operational benefits of the Light Rail, with the benefits and costs of the best route, from the point of view of not achieving the stated objectives of speedy service, maximum capacity and convenience for passengers along the whole route, but also minimum impact on the community, minimum traffic dislocation, maximum opportunity for future growth, maximum safety, fastest service and maximum capacity between Central and the Moore Park sports and events precinct and least impact on the streetscape, commercial activity, car , bicycle and pedestrian traffic, parking, trees and parkland amenity.

Surry Hills engineer, Robin Bean has proposed a less costly alternative route, directly from Eddy Avenue, sub-surface up Foveaux and Fitzroy Streets, across South Dowling Street, over the Eastern Distributor at the intersection of Anzac Parade and Moore Park Road, to enter the Anzac Parade busway to the proposed Light Rail stop at Moore Park, outside the Sydney Cricket Ground, using the latest “cut and cover” technology on most of the route (Consultation with Robin Bean necessary on details and to work on feasibility).

In costing this route, the costs of the Devonshire Street route proposal will need to be deducted, including the construction costs of resumption of Olivia Gardens, apartments, the bridge across South Dowling street and the Eastern Distributor, and the tunnel under Moore Park West,,

While there are technical difficulties associated with the proposed Foveaux street sub-surface route, they are not insurmountable, using modern technology. Direct construction costs may be greater, but the ongoing benefits identified above, far outweigh these, and will benefit the whole route to Moore Park and Randwick long into the future.

Trams travelling sub-surface in Surry Hills will be able to operate between Central and Moore Park up to three-times faster on that segment, which is essential for the whole service.

A proposed stop, with entrances/exits in a building at the busy corner of Foveaux and Crown Streets, will draw from a much larger passenger catchment than the currently proposed surface stop at the corner of Riley and Devonshire Streets, and the stop in Foveaux could create commercial income generating assets for both the building owner and the Light Rail operator, whereas the Devonshire stop would generate none of these, and the noise factor at the surface stop at all hours will be a constant irritant.

The proposed surface route, using Devonshire Street is totally unsuitable using the largest trams ever proposed for Australia at speeds up to 40 kph on a narrow, densely populated and commercially busy inner city street. It will create unacceptable dangers for other street users, and unacceptable noise and other pollution impacts for residents and businesses there.

### **3. Summary**

The alternative sub-surface route under Foveaux and Fitzroy streets, will be more direct (no awkward; noisy turns into Chalmers and then Devonshire Streets, with consequent traffic bottlenecks); no traffic disruption on intersecting north-south roads into and out of the City; no high noise impacts on residents 24 hours a day; no significant loss of parking or trees; no impact on the visual environment (thus retaining the existing heritage of the historic Surry Hills streetscape and community amenity, thus retaining the strong existing tourism appeal of the village)..

It will avoid the necessity for resuming 69 apartments at Olivia Gardens; noise impacts, not only on Devonshire street and streets running off it; but also Parkham and Nobbs streets; the loss of many trees on Devonshire Street; and disturbance of Moore Park West.

In positive terms, it will enable faster and safer unimpeded Light Rail services; greater tram capacity (with the possibility of three lines between Central and the Moore Park precinct); and no disturbance of Moore Park West

**Recommended** that TfNSW take into account the positives and negatives identified and seriously consider the alternative route through Surry Hills to ensure the Light Rail meets its objectives for users and the community alike.

Further consultation with the Surry Hills community will help a better outcome for all in the short and long term.

**Don Beresford**

**12 December, 2013**