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The Director-General  
NSW Department of Planning & Infrastructure  
GPO Box 39  
SYDNEY NSW 2001

Attention: Ingrid Ilias

## **CBD AND SOUTH EAST LIGHT RAIL PROJECT – SSI 6042**

This submission has been prepared in relation to the CBD and South East Light Rail (CSELR) Project, proposed by Transport for NSW. It has been prepared following a review of the Environmental Impact Statement submitted in relation to the proposal, and with the input of specialist consultants. This submission has been prepared by JBA on behalf of Anson City Developments 1 (Australia) Pty Ltd (Anson).

This submission specifically relates to the element of the project that proposes to locate the stabling facilities on a portion of land to the west of Randwick Racecourse. This portion of land includes a 1.73ha allotment owned by Anson and known as 66A Doncaster Avenue, Randwick.

No objection is raised to the proposal to connect Randwick (and Kingsford) to the CBD with light rail. Rather, this aspect of the proposal is supported by Anson Developments 1 Pty Ltd as it will improve travel to the CBD from 66A Doncaster Avenue and have positive urban development outcomes across the region.

However, serious concerns are raised with the proposed location of the stabling yards. These concerns primarily relate to acoustic amenity, hydraulic impacts, traffic impacts and land use compatibility given the immediately adjacent residential neighbourhood and residential development approved for 66A Doncaster Avenue. The EIS does not demonstrate that appropriate consideration has been given to these issues and the assessment of viable alternate locations for a stabling facility.

### **1.0 EXISTING SITE**

#### **Site History**

The history of the site can be summarised as follows. In 1859 the Australian Jockey Club transferred its activities from Homebush to Randwick. In 1880 the first tram services began to nearby Allison Road. After 1897, the east side of Doncaster Avenue was subdivided and in 1900 a new tram loop and station were built on the site.

Additional platforms and bridges were added in the first two decades of the twentieth century. Tram services ceased in the 1950s, and in 1960 the tram station was converted to a bus station. Bus operations ceased at the site in 1986 and in 1990 the dilapidated structures at the site were demolished. Only a brick ramp, the trees and bridge footings were retained.

The site was sold by the former State Transit Authority to Anson (a contract was exchanged in May 2003, with settlement occurring in August 2005). Since this time, the site has been vacant.

### Consent History

Section 15.4.1 of the EIS provides details of potential future land uses within the Randwick locality. It notes that a development application has been approved for residential development on the site of the proposed Randwick stabling facility. It does not provide a complete history of residential consents secured on the 66A Doncaster Avenue site, which is as follows:

- A Stage 1 DA for residential development on the site was lodged in relation to the site on 15 December 2006 (DA1097/2006). The DA sought concept approval for 52 three storey townhouses, a six storey apartment building containing 30 units, car parking and access. The proposal included the provision of landscaped public open space and its dedication to Council. Land was also to be dedicated for public roads and for a community centre (to be constructed at full cost to the applicant). The dedication of land and the community centre were subject to a Voluntary Planning Agreement (VPA). The DA was approved by Council's Planning Committee on 24 June 2008.
- The design was further revised and a new Stage 1 development application was submitted to Council for consideration. The land uses proposed in this application were fundamentally similar to DA 1097/2006, namely residential development comprising three storey townhouses and a six storey apartment building with associated roads, parking and open space. The application was approved by Council's Planning Committee on 14 April 2009.
- A Stage 2 Development Application (DA599/2010) was submitted to Council for residential development including the construction of 53 three storey town houses and a six storey building containing 29 dwellings, a community centre, public parks, associated site works, landscaping, utility services, car parking and vehicular access. This application was approved on 25 November 2010.
- A section 96 application to amend the Stage 1 DA (1097/2006) was lodged in July 2013 and is currently under assessment by Council. This application seeks to increase the number of dwellings on the site from 82 to 159

Providing residential development on this site is consistent with the relevant NSW Government policy documents, including the draft Metropolitan Strategy for Sydney, the Sydney Metropolitan Plan for Sydney 2036, and the draft East Subregional Strategy. In particular, the development will assist in meeting Randwick LGA's target of 8,400 new dwellings by 2031 as provided in the draft Subregional Strategy.

It should also be noted that the site is within the Randwick Urban Activation Precinct investigation area. The use of the site for residential purposes is consistent with the criteria identified in the NSW Urban Activation Precincts Guideline:

- it is consistent with State and regional strategies, particularly with regard to the provision of housing;
- it supports the use of existing and planned infrastructure;
- the site and future residential development will be environmentally, socially and economically sustainable and viable; and
- residential development of the site is financially viable and consistent with market demand.

In light of the above, the site is ideally positioned to provide for urban renewal and contribute to the relevant housing targets in NSW Government policy documents.

### Loss of Approved Community Facilities

As detailed above, development consent has been granted for the construction of and dedication to Council of a community centre. The design of the community centre was prepared in close consultation with Council. It has been designed to accommodate an art centre, and accordingly contains gallery spaces, a reception area and artist studios. The centre also includes a small studio apartment for an artist in residence.

In addition to the community centre, the consent (as approved) provides for the dedication and embellishment of a number of local parks within the site. These include the following:

- Fuse Box Park;
- Brush Box Park;
- Bridge Ramp Park; and
- Turnstile Park.

These parks would provide amenity for the proposed residential development and the wider Randwick residential community. The loss of the potential Bridge Ramp Park would be a significant loss for the area, as this is proposed as an interactive children's playground.

### Loss of Significant Trees

The technical reports prepared in relation to the residential development of the site identified that the arc of brush box trees, which indicate the alignment of the original tram lines on the site, have heritage significance as they demonstrate the principal historic entrance to Randwick Racecourse. The proposed stabling yard seeks to remove all these trees, with no replacements or interpretive elements provided.

## 2.0 IMPACTS ON SITE

### Acoustic

The EIS shows stabling tracks of the proposed stabling yard immediately adjacent to the rear boundaries of the existing residential properties addressing Doncaster Avenue.

An Acoustic Assessment of the proposed stabling yards has been undertaken by Soundmatters TTM (refer Attachment A). It notes that although light rail generate less noise than heavy rail when operating on the open system, the noise associated with stabling and maintenance for light and heavy rail is essentially the same.

Details of the types of noise generated by a light rail stabling yard are provided in the assessment, but can be summarised as:

- LRV stabling and preparation
  - Brake application
  - Compressor cycling
- Horns
- Cleaning
- Wheel squeal

Although all significant sources of noise, of these wheel squeal is perhaps the most annoying and difficult to control noise source in the stabling yard. It is produced by lateral slip of the wheel across the rail. This is most likely to occur at certain train speeds travelling through bends, particularly tight radius turns as provided in the yard.

Long term monitoring by Railcorp suggests that wheel squeal can significantly exceed 100 dB(A) at a distance of 15m. In addition to the high level of noise produced it is also high-pitched, which means it will stand out against the broad spectrum ambient noise environment dominated by traffic noise from Alison Road. It is particularly inappropriate in a residential environment and zone and is better located away from residential developments, ideally in an industrial zone.

Typical noise mitigation measures such as, an enclosure over the stabling yard or noise barrier will be either impractical or ineffective. Noise barriers regardless of height (within reason) can only achieve a practical maximum noise attenuation of approximately 20 dB(A). This may benefit single or two story houses, but will not benefit apartments at higher levels that will have direct line of sight into the stabling yard.

Furthermore, with sound power levels for horns and wheel squeal far in excess of 100 dB(A) a noise barrier will not provide the necessary attenuation to avoid loss of acoustic amenity and sleep disturbance. Residential dwellings sharing boundaries with the stabling yard are expected to have significant loss of acoustic amenity.

It is noted that the EIS provides that even if a six metre high acoustic barrier is constructed on the boundary and an acoustic shed is provided over the entire site, the noise criteria for five residential receptors will still be exceeded. There is simply no technical solution proposed within the EIS that will ensure the acoustic amenity of all the existing dwellings in the vicinity will be maintained. This is a clear indication that the proposed stabling facilities are inappropriate for the site.

#### Hydraulic

Worley Parsons has undertaken a review of the proposed stabling facility in terms of the hydraulic constraints of the site, based on various technical studies undertaken in relation to the potential of the site to flood (refer Attachment B). The conclusions of this review are unequivocal:

*If the site were to remain predominantly at existing surface levels, thereby limiting potential flood impacts on surrounding properties, it would likely experience nuisance flooding in relatively frequent events in the order of the 2 to 5 year ARI storm, and more damaging impacts during larger, but less frequent events.*

*The conclusions within the Climate Change Risk Assessment for the CSLER Project indicate that potential climate change scenarios, which include 15% increases in rainfall intensities, would lead to a significantly greater flood risk due to increased likelihood and consequence of flooding.*

*If the proposal is to involve raising of the landform to provide greater flood immunity, this would lead to unacceptable impacts on surrounding properties or require significant upgrades to existing drainage infrastructure to reduce potential flood impacts to acceptable levels.*

*Potential options for mitigating flood impacts include upgrading downstream drainage capacity or providing detention. However, both of these options would come at considerable cost that could well be greater than the cost of relocating the horse stabling facilities at Wansey Road.*

***Therefore, based on the assumed requirements for a light rail stabling facility (i.e., relatively flat land at similar levels to the adjoining road infrastructure), it is our opinion that for the reasons set out above, that the flood constraints at the site are likely to mean that the Doncaster Road Site is not an appropriate location for the proposed stabling facility. Further investigation into potential flood impacts and mitigation options at the Doncaster Avenue site is required to justify its selection.***

In summary, the currently proposed stabling yard site is within an existing floodway. If the landform of the site was raised to protect the operation of the stabling yard from flooding, this would result on significant unacceptable flooding impacts on surrounding properties.

## Traffic

The proposed stabling yards have been assessed in terms of traffic impact by EMM (refer Attachment C). This assessment provides a detailed rationale for alternative locations for the yards (discussed in Section 3.0 below), but also raises concern with the operational details of the proposed stabling yard.

The proposed stabling yard is not suitable for peak racecourse use as light rail vehicles (LRVs) would have to come out of the sidings and either reverse to pick up passengers from the racecourse station or the driver would have to change location in the vehicle before departing towards the city. These tram turn-around or reversing movements would unnecessarily complicate the light rail vehicle movements in the area, with trams moving across and within the Alison Road footpath which is an area of high pedestrian activity during race meetings.

## Other Issues

### Visual Impacts

The EIS considers (at section 15.7.5) that the visual impact of a six metre wall on the boundary and an acoustic shed constructed over the stabling yard would only have a minor adverse landscape impact when viewed from the rear gardens of the existing Doncaster Avenue residential properties. This assessment appears incorrect, as a six metre high wall constructed on a boundary would have a significant negative impact on the existing landscape character of the area. Photomontages of the proposed acoustic wall should be provided to assist with an assessment of the visual impact.

### Heritage

The approved residential development retains and celebrates the various items of heritage significance on the site, including the bridge ramp and arc of brush box trees. The proposed stabling yard makes no provision for the retention of these items.

## 3.0 ALTERNATIVE LOCATIONS

The EIS does not reasonably compare the various options in relation to the potential location of the stabling yard. It appears to suggest that five design options were considered, however three of these relate to the location of the maintenance yards. There are only two options considered for the location of the stabling yard, and both of these are in Randwick. No consideration appears to have been given to locating the stabling yard elsewhere.

The assessment undertaken by EMM (refer Attachment C) provides a comparison between the potential stabling sites adjacent to the racecourse (Doncaster Avenue and Wansey Road). In summary, both sites are equal in terms of size and capacity and operational suitability, but the Wansey Road site is superior in terms of potential noise and visual impacts to nearby residents.

As noted in the EIS:

*The stabling-only facility within racecourse land adjacent to Wansey Road would provide a key benefit over the Doncaster Avenue site as this site is generally situated below the surface of Wansey Road residences, providing some screening for noise and visual impacts of stabling facilities.*

*The key differentiator between the two stabling only sites in the western and south-eastern portions of the Royal Randwick racecourse is that, whilst both sites would require significant land acquisition, the site adjacent to Wansey Road is currently occupied by a number of horse stables, which would require relocation prior to accessing this site. This would likely entail additional cost and property acquisition, which reduces the cost effectiveness of this option.*

However, the consideration of the Wansey Road site refers to the cost of the relocating horse stables, however no mention is made of the cost six metre high wall and acoustic shed required on the Doncaster Avenue site (the construction of which, as previously detailed, still does not

preserve the acoustic amenity of the existing residences). It is also noted that the Wansey Road site is Crown land, given that it is owned by the Randwick Racecourse Trust<sup>1</sup>.

Crucially, the EIS does not contain any comparison regarding the cost of acquisition of the alternate sites. The acquisition costs for 66A Doncaster Avenue, which has development consent for residential development – would be very significant. It has the benefit of a development consent for 82 dwellings. If the section 96 notification is approved it will have development consent for 153 dwellings.

Furthermore, there is no reasoning provided as to why the preferable location for stabling the entire fleet is Randwick. No consideration appears to have been given to locating the stabling facilities at the former Rozelle Goods Yard, incorporated with the proposed maintenance facility. Furthermore, no consideration has been given to locating the facilities at the end of the line in Kingsford.

There is clearly sufficient vacant railway land available within the former Rozelle Goods Yard rail sidings, which can be utilised to provide the main light rail maintenance depot and stabling facilities, not just for the Inner West & Dulwich Hill Light Rail route, but for the entire network of potential Sydney Light Rail routes including the proposed CSLER route.

Rozelle is a far superior stabling site with much greater capacity and significantly fewer likely environmental impacts for adjacent residential properties than the proposed site. Further comparisons are provided in the assessment undertaken by EMM (refer Attachment C).

If additional tram stabling were required for some weekday early morning starts for a small number of light rail vehicles in the Randwick, Kensington or Kingsford areas, before trams starting from a main depot facility at Rozelle would have reached this section of the CSLER route, this could be achieved by an alternative tram stabling location within the eastern side of the racecourse, with the sidings oriented parallel to Wansey Road.

#### 4.0 CONCLUSION

Serious concern is raised as to whether the proposed stabling yards is located on a suitable site, given:

- Existing residential development is in extremely close proximity to the proposed facilities.
- Acoustic amenity targets for existing residential dwellings in the vicinity cannot be met, even with the implementation of significant mitigation measures.
- The mitigation measures would have a significant visual impact, given they include a six metre high acoustic wall constructed on the boundary.
- The flood constraints of the site render it unsuitable for the proposed facility.
- The location of the facility results in an awkward relationship with the planned Racecourse stop, which can expect very significant major event patronage.
- Providing the stabling yard in this location would prevent the construction of the approved residential development on the 66A Doncaster Avenue site, which would then be unable to provide the following benefits:
  - A community centre to be dedicated to Council;
  - A number of local parks, including an activity playground, also to be dedicated to Council; and
  - A significant contribution to the new housing targets for Randwick.

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<sup>1</sup> Under section 27A of the Australian Jockey and Sydney Turf Clubs Merger Act 2010, the Randwick Racecourse Trust is constituted as a corporation under the Act, and is, for the purposes of any Act, a NSW Government agency. Accordingly, the trust is a State-owned corporation and the land can be described as Crown land.

- Providing the stabling yard in this location would also preclude further integration of the site into the Randwick Urban Activation Precinct.
- Other alternative sites are available and warrant further investigation, including Wansey Road, at the end of the line at Kingsford, and the former Rozelle Goods Yard.

A proper consideration of alternative locations for the stabling yard must be undertaken and the results publically released to ensure that the selected location is suitable. The current preferred location will have significant acoustic and visual impacts on existing dwellings, is unsuitable in terms of flooding impacts and has not been costed.

Should you have any queries about this matter, please do not hesitate to contact me on 9956 6962 or [rstark@jbaplanning.com.au](mailto:rstark@jbaplanning.com.au).

Yours faithfully



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cc The General Manager, Randwick City Council