

10 December 2013

Mr Tom Hu  
Development Manager  
Kapau Holdings Pty Ltd  
Level 6, 285 George Street  
Sydney, NSW 2000

Re: EIS Submission- Objection to proposed use of private land at 66a Doncaster Avenue for light rail depot and stabling sidings

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Dear Sir,

The proposed use of the privately owned land at 66a Doncaster Avenue, in conjunction with other adjacent land in the north western corner of the Royal Randwick Racecourse is unsuitable and incompatible with the amenity of adjoining residential properties for a number of reasons. More suitable locations for the proposed main carriage stabling facility for the CBD and South East (CSELR) light rail route are also available either on the racecourse land along the eastern side, which is below the level of Wansey Road, or at Rozelle in the former Rozelle Goods Yard.

These alternative locations are more suitable for the proposed carriage stabling facility for the reasons outlined below, with further details provided in the following summary text and table of this letter.

1. A similar stabling facility to accommodate up to 30 light rail vehicles could be provided on land which is below the level of Wansey Road along the eastern side of the Royal Randwick Racecourse. This stabling facility should probably be located generally closer to the Alison Road end of Wansey Road, in comparison to the Wansey Road site which was actually investigated in the comparison of stabling sites in the EIS (Figure 4.3). This alternative (Wansey Road) stabling site would have generally fewer environmental impacts for surrounding residential properties, would be more suitable for peak raceday operations and would also be a much cheaper site to develop than the proposed 66a Doncaster Avenue location as the relevant racecourse land is already in public ownership.
2. The preliminary analysis of carriage stabling sites in the Randwick/Kensington area which was undertaken by the original GHD feasibility study report for the project for Randwick Council in September 2011 (Randwick Light Rail Pre-Feasibility Study, Final Report, Randwick City Council, 26 September 2011) recommended that the land at the western side of the Royal Randwick Racecourse (eg including the 66a Doncaster Avenue land) was not appropriate for a light rail stabling depot given its proximity to residential areas. This site would effectively require a high noise wall to be constructed to mitigate the noise impacts for the adjoining residential properties, which would then create significant adverse visual and overshadowing impacts for the rear garden areas of these properties along the eastern side of Doncaster Avenue.
3. Stabling for the entire vehicle fleet of approximately 30+ light rail vehicles needed to operate the CSELR route, is specifically required to be accommodated in the Randwick/Kensington area. A significant part of the overall vehicle fleet could also be stabled in the former Rozelle Goods Yard. The Rozelle site is identified in the EIS as a suitable location for a combined vehicle stabling and maintenance facility for the CSELR route, in addition to fulfilling a similar role for the Inner West & Dulwich Hill Light Rail route.

A direct comparison of the suitability of the two alternative Randwick carriage stabling sites (Wansey Road which is wholly on publicly owned racecourse land) and the combination of privately owned land at 66a Doncaster Avenue site with land in the north western corner of the racecourse, for stabling approximately 30- 40 vehicles for the proposed CSELR light rail route, is provided in the following table.

**Table 1 Comparison of suitability of Light Rail Stabling Sites at Randwick**

Criteria	Land west of Wansey Road	66a Doncaster Avenue	Comparison
Size and capacity of the proposed facility	The site has sufficient generally level land suitable for a light rail depot with sidings for up to 30-40 light rail vehicles potentially	The site has sufficient generally level land suitable for a light rail depot with sidings for up to 30-40 light rail vehicles potentially	Both sites are equally suitable
Site level changes and flood liability	The land slopes up in places towards Wansey Road and may require some levelling within the general area to assist with the construction of a suitable facility	There are significant differences in levels between the 66a Doncaster Avenue section of the site and the racecourse portion of the land (which is effectively in a floodway) which cannot be resolved without adversely affecting the flooding liability of other adjacent land in the area	Wansey Road is more suitable
Potential noise impacts for nearby residents	The site is located generally below natural ground level which will provide good natural mitigation of noise impacts for nearby residential properties. Background noise levels would also be higher in this area due to the operation of traffic and future light rail vehicles along Wansey Road and the Alison Road frontage of the racecourse.	There could be significant night time noise and amenity impacts for the existing Doncaster Avenue residences which back on to the 66a Doncaster Avenue land. If mitigated by a noise wall, the noise wall itself would then have significant visual and overshadowing impacts	Wansey Road is more suitable
Potential visual impacts for nearby residents	The site is located generally below natural ground level which will provide good natural screening of potential visual impacts	There could be significant visual amenity impacts for the existing Doncaster Avenue residences which back on to the 66a Doncaster Avenue land	Wansey Road is more suitable
Internal configuration of the proposed stabling sidings	The sidings can all be located on a parallel alignment to Wansey Road, with good operational reliability.	The proposed siding design incorporates a 180 degree U-bend which all vehicles will need to negotiate in order to access the stabling sidings. This U-bend will adversely affect the sites operational reliability and also be a source of "wheel squeal" type rail noise	Wansey Road is more suitable
Operational suitability for early morning starts	The site is suitably located to accommodate the bulk of the proposed Sydney CBD – Randwick Light Rail vehicle fleet. Some additional local stabling of light rail vehicles within the Randwick area is also required for peak sporting events usage at the Royal Randwick racecourse and the SCG sporting precinct	The site is suitably located to accommodate the bulk of the proposed Sydney CBD – Randwick Light Rail vehicle fleet. In the EIS comparison of sites Wansey Road was considered less optimal in relation to the distance from the Sydney CBD and Kingsford. It is however more suitably located from the viewpoint of peak raceday tram operations at the Royal Randwick racecourse	Both sites are equally suitable It is also noted that some additional overnight stabling of tram vehicles could also occur either at Rozelle or at the Kingsford end of the Anzac Parade route to facilitate early morning starts from a number of locations along the CSELR route.

The respective distances of the two proposed light rail stabling sites at Randwick (Wansey Road and Doncaster Avenue) from the Sydney CBD is not considered to be a significant issue in terms their suitability for inbound early morning tram operations as light rail vehicles stabled at either location would probably collect passengers during their first inbound run towards the Sydney CBD in the morning, so in neither case would trams be operating empty over significant distances.

The likely orientation of the light rail stabling sidings on the 66a Doncaster Avenue/Randwick racecourse land at the western side, would not be generally suitable for the peak racecourse use as vehicles waiting in the sidings would either have to come out of the sidings in reverse, to pick up passengers from the racecourse station or the driver would have to change their location in the vehicle before departing towards the city. These tram driver change over or tram reversing movements would unnecessarily complicate the peak race day light rail vehicle operations in this area, which is also known to be an area of high pedestrian activity and congestion, during the periods immediately after race meetings.

In comparison for peak race day operations, trams stabled at a location parallel to Wansey Road, close to the northern end of Wansey Road, near Alison Road, would be able to simply drive in one direction towards the racecourse station, collect passengers travelling towards the city and then depart with no additional delays, from either driver changeovers or tram reversing being required. It is understood that the racecourse managers are keen to have a tram stabling site which is suitable for use for peak raceday operations and Wansey Road is clearly more suitable for this purpose than the 66a Doncaster Avenue land.

Also, the natural terrain of the land along the eastern side of the racecourse, along Wansey Road, is located sufficiently below the level of surrounding residential properties of Wansey Road, which is much more suitable for providing good natural noise and visual buffering opportunities to nearby residential properties, than if the future tram stabling operations were to be located near Doncaster Avenue.

A further consideration which is also highly relevant, is that the consideration of alternative stabling location for light rail vehicles in the Randwick locality, which is presented in Chapter 4 and Chapter 5 of the EIS report, does not appear to have adequately considered that the privately owned land at 66a Doncaster Avenue has development approval, with other development application modifications pending, for a combined medium density housing and residential apartments development of at least 86 dwellings, with a potential market value of the order of \$135 million.

Nevertheless, for either the Wansey Road or the 66a Doncaster Avenue land stabling options at Randwick, additional tram stabling should also be provided at a combined stabling and maintenance depot facility for the route at Rozelle, which should also be capable of accommodating a significant proportion of the total vehicle fleet for the CSELR route.

Rozelle is a far superior stabling site for the stabling of a significant proportion of the CSELR vehicle fleet, with much greater capacity and significantly fewer likely environmental impacts for adjacent residential properties, than either of the two potential tram stabling facilities in the locality of the Royal Randwick Racecourse. The likely size of the Randwick stabling facility could be substantially scaled down if additional stabling capacity for the CSELR route were to be provided at Rozelle.

## **Conclusion**

There are two potential sites for a proposed light rail vehicle stabling facility in the Randwick area, for the stabling of a significant proportion of the light rail vehicle fleet for the CSELR light rail route. Vehicle stabling in the vicinity of the Royal Randwick racecourse is also required for the peak raceday operations at the racecourse.

An alternative Wansey Road stabling site, which would permit the light rail vehicles to be stabled in sidings generally parallel to Wansey Road, would be much more suitable than the currently proposed combination of using the 66a Doncaster Avenue land in combination with “flood liable” land in the north western corner of the Royal Randwick racecourse, for the following reasons:

- The Wansey Road site would have fewer noise and visual impacts for adjacent residential properties
- The Wansey Road site is more suitable for peak raceday operations
- The Wansey Road land will be less expensive for the NSW government to acquire
- The Wansey Road land is generally less flood liable
- The Wansey Road land would not require the stabling sidings to be accessed via a 180 degree U-bend, which will increase wheel squeal type rail noise and will potentially adversely affect the operational reliability of the sidings.

The combination of these reasons indicate, that at the earliest opportunity, to avoid further unnecessary delays to the CSELR project, the project design details in the Randwick locality should be revised to reflect the more suitable stabling option which is available at the alternative Wansey Road site, in comparison to the currently proposed combination of the 66a Doncaster Avenue land with the racecourse land in the north western corner.

Yours sincerely



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