

12 December 2013

**NSW Government
Department of Planning and Infrastructure**

By email / web submission

Dear Sir / Madam,

CBD and South East Light Rail Project - Comments on EIS exhibition

We refer to the EIS exhibition for the CBD and South East Light Rail Project.

Firstly, we wish to state that Centennial Park and Moore Park Trust (CPMPT) supports the concept of the CSELR project and recognizes it's potential to provide improvements to accessibility to the Moore Park precinct through an alternative sustainable form of transport, which will in turn drive economic activity, improved amenity, and improved connectivity between the CBD and the precinct.

Our review of the EIS is based primarily on the design proposed as exhibited, however we are aware of the significant changes to the proposal and have therefore also incorporated comments on the latest revised scheme that has been presented to us more recently.

CPMPT's comments relate to the following three overarching key principles:-

1. Any visual impact, impact on the environment or ecology of the park, reduction in amenity or reduction in actual parkland area must be kept to the absolute minimum required for the construction and subsequent operation of the light rail, and in a manner so as to cause the minimum disruption for the community and other stakeholders who use the parklands.
2. The ongoing operations and maintenance of the parklands is undertaken on a self-funded basis through revenue obtained from various activities or existing commercial agreements in place. Anything that impacts on the revenue stream to CPMPT must be replaced under the same terms as a minimum in order to maintain the ongoing operations.
3. Any impact on the parklands and its playing fields, either on a temporary basis during construction or permanently, must be reinstated or replaced on a like for like basis in a manner and location as nominated or agreed by CPMPT.

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As the EIS makes reference to various areas of the Moore Park precinct throughout the document, rather than attempting to be specific about page numbers and sections which may result in a section being overlooked, we have grouped our comments into the following main sections:-

- Moore Park West (MPW)
- Moore Park East (MPE)
- Moore Park station design, location and turn back (as revised)
- Moore Park South, Lang & Robertson Road (MPS)
- General

1.0 Moore Park West (MPW)

- 1.1 The option for a cut-and cover tunnel to cross Moore Park West rather than a viaduct is strongly supported, and conversely a viaduct option would not be supported in any way due to its impact on the visual and general amenity of the Park
- 1.2 The portal entry (MPW) and exit (MPE) designs, including the immediate surroundings, and extent of impact into MPW and MPE needs to be clarified and agreed with CPMPT.
- 1.3 The depth and quality of the tunnel covering (earth material) must be carefully considered and designed to enable the proper establishment, growth and maintenance of grass and other landscaping above the tunnel post-construction, with no visible difference compared to immediately adjacent areas.
- 1.4 Loss of the amenities block that services the fields is to be replaced temporarily during construction and reinstated upon completion of the project.
- 1.5 Safe access for the general public to all the available fields during construction must be maintained. It should be noted that the Sydney Boys High and Sydney Girls High students will continue to use the remaining fields throughout the construction of the project.
- 1.6 The loss of any MPW wickets/fields impacts on CPMPT ability to meet community demand during summer and winter, impacting on established long term relationships with many sporting clubs and the community who use the fields. Temporary facilities and / or replacement of revenue is required.
- 1.7 The proposed construction zone on wicket 16 and field 16 will result in a loss of the field and corresponding revenue during construction. Replacement of the revenue stream during construction and reinstatement of the field following completion is required.

1.8 There is a full irrigation system in place with its own stand-alone bore. This will need to be protected and / or reinstated as appropriate.

1.9 Note that the Korean War Memorial receives regular visits from dignitaries and therefore access and ongoing upkeep will need to be maintained.

2.0 Moore Park East (MPE)

2.1 The EIS shows significant impact on Kippax Lake Field which is unacceptable as the field is heavily used as an elite training facility for the Waratahs Super Rugby and Sydney Roosters Rugby League football teams. However, we understand that the current design has proposed moving Moore Park station further south and leaving the special event bus terminus in its existing location, resulting in no impact on Kippax Lake field. This proposal is supported by CPMPT.

2.2 Tramway Oval (elite training field)

2.2.1 The proposed tunnel and ascent onto the western side of Tramway Oval will have a direct impact on the elite training facility with the loss of approximately 14m in playing surface which is unacceptable.

It is suggested that to minimize any impact on the oval and parklands generally, the light rail route is wholly co-located within the existing bus way on Anzac parade. CPMPT would consider supporting the removal of some trees to accommodate this, provided an appropriate tree replacement program is agreed.

2.2.2 Any proposal to move Tramway Oval east to accommodate the Light Rail is subject to agreement by CPMPT and the Sydney Swans AFL Club. If agreed, movement of the field will impact on irrigation systems, drainage and lighting and general electrical supply to the area which must be maintained and reinstated to a standard specified by CPMPT for the periods during and post construction. The mains distribution board is located on the side of the tram shed and 24 hour access is required.

2.2.3 Moving the field east to regain lost area may also impact significantly on the current bus loop and associated infrastructure, and is not necessarily supported, pending the provision of further information by TfNSW.

2.2.4 Any significant loss of forecourt area to accommodate a possible relocation of Tramway Oval to the east would impact on crowd movement and safety via SCG Emergency evacuation procedures, and Driver Avenue traffic. Any impact should therefore be minimized and agreed with CPMPT.

2.2.5 AFL fields require a minimum 5m fall zone beyond the boundary and we are extremely concerned about the potential proximity of the light rail and its impact on safety of athletes using the field, and retrieving stray balls

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landing on the light rail track. This will need to be addressed to the satisfaction of CPMPT and the Sydney Swans AFL Club.

2.2.6 The proposed 24 hour use of the bus loop also creates significant safety concerns with regard to access and stray balls, which will need to be addressed to the satisfaction of CPMPT and the Sydney Swans AFL Club.

2.3 There is a proposed substation located near the corner of Lang Road and Anzac Parade. It is understood that the substation footprint is approximately 80m² with land requirements of approximately 250m². It is preferred that the Moore Park substation is designed as a below ground sub-station as shown in figure 5-49, rather than a stand-alone structure which is unacceptable as the size is too intrusive and will take up a substantial amount of land. Alternatively, it is suggested that the substation be relocated and designed to be integrated with the proposed new amenity building near the tennis centre.

2.4 Any disturbance of Showground Field may impact on the contamination containment measures currently in place. TfNSW would be responsible for any impact and reinstatement of the containment measures to the same standard as currently exists. Further, any loss of event car parking spaces in the Showground field area will have a direct financial impact on CPMPT which would eventually impact on the operation and maintenance of the parklands. The extent of any car park loss needs to be minimized as any loss of CPMPT revenue must be replaced either by reimbursement or alternative facilities being provided.

2.5 There is a heritage sign on the corner of Lang Road and Anzac Parade which will need to be protected (possibly by removal and reinstatement) by TfNSW.

3.0 Revised Moore Park Station Design, Location & Turn back

3.1 The park stop typology defined in section 4.1 is supported. However, the intent of minimising visual impact does not seem to be reflected in the initial designs presented for the Moore Park stop. The proposed design of the Moore Park stop as a two storey structure with vertical lift access has a significant impact on the visual amenity of the Park and is not supported. A single storey structure or minimal lightweight means of delivering passengers onto the central platform is to be considered. The stop requires appropriate design and construction in consultation with the Trust's heritage guidelines given its prominent location.

It is suggested that crowd control during events is managed in a manner that does not require a 2 –storey structure. It is noted that the Royal Randwick Racecourse stop which is also used for special events is designed as a single storey structure.

3.2 It is understood that the Moore Park stop is to be relocated further south toward Lang Road. This move is supported, and TfNSW is encouraged to position the stop as far south (close to the intersection of Lang Road) as possible so as to minimize

any disruption to the Tramway Oval. Final positioning of the stop should be agreed with CPMPT in relation to its impact on surrounding parklands.

3.3 A means of safely managing crowds from events to avoid congestion created by close proximity of the station and bus loop must be properly considered and integrated into the light rail design proposal.

3.4 The design and positioning of the turn back will impact on CPMPT's long term plans to redevelop Showground Field. CPMPT questions whether a turn back is required at this location at all, as there is one proposed at Randwick. It is suggested that consideration be given to either deleting the turn back altogether from this area, or relocating it south of the Lang road intersection, or integrated with the stabling yard area on Alison road at Randwick, which is only a further 2 minutes away.

4.0 Moore Park South, Lang & Robertson Roads (MPS)

4.1 Robertson Road Fields

- 4.1.1 The proposed construction site on wickets 13 and 14 will impact on use and revenue. Note that there is a direct impact on 18 major users including Last Man Stands, AFL NSW, SCEGGS, Sydney Morning Cricket Competition and Sydney Boys and Girls High Schools. TfNSW should try to minimize the loss of wickets as much as possible, and in this situation it is suggested that losing one whole wicket is better than losing half of 2 wickets.
- 4.1.2 Diamonds 8 & 9 are impacted; same comment on revenue and usage as above. This has a direct impact on 3 major users including South Sydney PSSA, St Mary's Cathedral College and Sydney Coastal PSSA.
- 4.1.3 The amenities block in Robertson Road appears to be affected and is to be replaced.
- 4.1.4 Confirmation of any impact and subsequent rectification measures on the existing underground irrigation system is to be discussed and agreed with CPMPT.
- 4.1.5 There is major electrical infrastructure located at Federation Way, and possibly a major sewer line. TfNSW to make their own enquiries and agreement regarding impact with the respective utility companies.

4.2 Parklands Tennis Centre

4.2.1 The proposed construction zone restricts vehicular entry to the Parklands Tennis Centre which will directly impact on the terms of the current commercial lease and potential loss of trade for the Lessee. The function of the existing building will also be significantly impacted by a remodeling of the building entrance. A suitable alternative arrangement is to be agreed with CPMPT.

4.2.2 It appears that there will be a loss of 29 metered car spaces and other permit spaces servicing the Tennis Centre and Lang Road courts. Alternative parking arrangements are to be provided to replace the loss of spaces. If patrons are required to walk from Robertson Road or the Entertainment Quarter (EQ) as part of a short term solution, safety and security concerns will need to be addressed, as these facilities have frequent night-time use.

4.3 Robertson Road kiosk/change room

4.3.1 The proposed construction zone will result in the demolition of the existing kiosk, office, storage facilities and change rooms at Robertson Road. The facility must be replaced in a location and specification to be agreed with CPMPT.

4.3.2 Loss of public toilet facilities and hirer storage at the southern end of the Fields will also need to be replaced in a location and specification to be agreed with CPMPT.

4.4 Federation Way access is a major thoroughfare for pedestrians, runners and cyclists into the CPMPT precinct from the CBD, and access must be maintained.

4.5 The location and design of bicycle parking facilities at the Moore Park stop are to be integrated with the existing and /or proposed Parklands bicycle parking facilities

4.6 The Centennial Park Master Plan (Land Use Vision) has located a major entry into the Park along Alison road, and it is requested that the location of pedestrian crossings in this vicinity (near the Royal Randwick Racecourse stop) are coordinated with the Centennial Park Master Plan.

5.0 General

5.1 Construction Impacts

- 5.1.1 Detail information on the extent of construction compounds is to be agreed with CPMPT to ensure the impact on playing fields and general amenity is minimized.
- 5.1.2 The proposed Moore Park site office location as indicated on page 6-17 is unacceptable as this is in an area that has a newly installed training field
- 5.1.3 It does not appear that any assessment has been undertaken of the impact on the Robertson Road access to Centennial Park. This is a major access point.
- 5.1.4 The temporary set downs for buses adjacent to Randwick Gates requires further consultation with CPMPT.
- 5.1.5 Traffic impacts on access for other key stakeholders in the area such as Entertainment Quarter, Royal hall of Industries, Horden pavilion, Fox Studios, CPEC, MPG needs to be minimized.
- 5.1.6 Noise, dust and vibration from construction could be an issue for park users and licensees of Trust premises in the vicinity. For example, the impact of noise and vibration on the Playbill venues (Horden Pavilion and Royal Hall of Industries), the Entertainment Quarter and Fox Studios and the impact of dust on users of nearby sports fields is a concern. TfNSW must require the Contractor to discuss and agree an appropriate program and methodology to suit the requirements of the licensees.
- 5.1.7 Environmental management of the land used for construction compounds shall be managed to ensure no long term impact on the environment and ecosystems.
- 5.1.8 Polluted water, sludge and other effluent from construction activities must be managed to ensure no adverse impact on the surrounding environment and in particular Kippax Lake in Moore Park East and the Kensington Ponds in Centennial Park further south.
- 5.1.9 Potential Damage to Trust assets as a result of Light Rail construction activities, such as road pavement and kerbing, trees and furniture, in addition to fields and other amenities as already described must be mitigated, repaired or replaced as appropriate.
- 5.1.10 With substantial heavy vehicle movement to and from the construction sites, damage to the adjoining roads is a major concern and particularly

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Driver Avenue which is maintained by CPMPT. The condition of this road must be maintained in safe condition for other traffic that will continue to use it and full restoration is to be undertaken by TfNSW at the completion of the project to the satisfaction of CPMPT.

5.1.11 With large parts of Moore Park taken up for construction, many access paths through the precinct, heavily utilized by pedestrians, will be affected. Temporary alternate pathways and adequate way-finding and lighting may be required and should be provided as part of the project.

5.1.12 Event management during construction

Major events at the SCSGT sports stadia, Entertainment Precinct and Centennial Park will continue throughout the construction period. It is imperative that TfNSW and the Contractor have adequate plans in place to ensure there is good coordination with event management to avoid potential problems. It is recommended that TfNSW and / or the Contractor attend or become members of the MEOG committee which oversees events in the precinct.

5.1.13 The proposed traffic changes to Anzac parade particularly around the Alison road intersection will impact on the Boronia street access to the ES Marks athletics field. An alternative access must be provided.

5.1.14 It is noted that one lane of the bus way will be closed during the 5 year construction period. It is suggested that this arrangement can continue once the project construction is completed, as presumably there will be less bus routes operating at that time.

5.1.15 The proposed temporary event bus set-downs on Darley road will impact on car parking provisions and access to the Centennial Park entry gates. This has not been discussed in detail with CPMPT and may not be acceptable unless alternative parking and access into the park are made available by TfNSW.

5.2 CPMPT owned and / or managed land affected by the light rail is to be defined in terms of area affected (sqm) and clearly shown in a survey to enable detail discussions between TfNSW and CPMPT.

It is noted that detail discussions are yet to be held with CPMPT regarding the following parcels of land which are owned and /or managed by CPMPT:-

- Land on Alison road to be used as the light rail stabling yard, currently leased by CPMPT to the ATC
- Tay Reserve at the intersection of Anzac road and Alison road, which will be substantially impacted by the light rail route
- Access to the ES Marks Athletics field from Anzac parade (Boronia Street)

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- Driver Avenue is currently shown as a bus route and a potential detour route for traffic during construction. Note that Driver Avenue is normally operationally closed during major events, and that access arrangements are to be discussed with MEOG and agreed with Fox studios in particular.

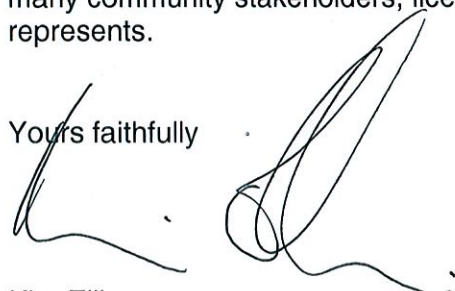
5.3 Landscaping and public domain works

- 5.3.1 The park alignment typology defined in Table 4.1 is supported. Similarly the undertaking to replace trees on an 8:1 ratio is strongly supported. It is unlikely that the proposed lower end of the range of 2:1 ratio would be supported, given the nature and age of the trees in the precinct. The species selection and placement of the replacement trees is to be agreed with CPMPT, and may require temporary location off-site to match the CPMPT planting program.
- 5.3.2 TfNSW should agree a process for managing the risk of potential future loss of trees as a consequence of the project construction, such as the de-watering process, construction disturbance and permanent infrastructure positioned in proximity to the previously established tree root systems. Some trees may not display any visible impact until some years following completion.
- 5.3.3 All landscaping and public domain works including public art on CPMPT land are to be undertaken in accordance with CPMPT requirements as well as the respective Sydney City and Randwick Councils as proposed.

5.4 Further details of positioning and design of catenary wiring poles are required, as these could have significant impact on the parklands. We request consideration of no overhead catenary as proposed for George Street.

We look forward to the Department of Infrastructure and Planning and TfNSW reviewing the above comments, and responding with a view to finding mutually acceptable solutions for the many community stakeholders, licensees and other parties whom CPMPT as landowner represents.

Yours faithfully



Kim Ellis
Chief Executive

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