

16 December 2013

Department of Planning 23-33 Bridge Street SYDNEY NSW 2000

Dear Sir/Madam

## RE: CBD and South East Light Rail Project

Thank you for the opportunity to provide comment on the CBD and South East Light Rail project (CSELR). The Sydney Business Chamber (the Chamber) is a division of the NSW Business Chamber and represents Sydney's leading organisations from the corporate, public and not-for-profit sectors. The Chamber advocates for Sydney to be a competitive and sustainable global city. The majority of Chamber members are based in the CBD; many headquartered in the area directly impacted by the proposal, and are all located within the Greater Sydney Basin.

The Sydney Business Chamber in principle gives support to the proposed route design and associated road and traffic changes of the CSELR as outlined in the Environmental Impact Statement (EIS). Light rail, as a high frequency and highly reliable public transport service, is part of the solution to address Sydney's transport needs, but it must be seen as more than that; it should be the catalyst for public domain and urban renewal along the route.

The reduction in buses accessing the CBD as a consequence of the SE light rail service will ease some of the congestion in the CBD attributable to buses both in service and not in peak hour that currently bank up along key routes in the CBD. CSELR will be a transformative agent for the CBD by providing a reliable public transport service along George Street and allowing the removal up to 200 buses from the CBD. Combined with the opening up of sections of George St to pedestrian-only zones, light rail will drive a makeover of the city's key boulevard, George Street, with the capacity to attract tourists, shoppers and improve the experience of residents and workers.

The two issues that have caused concern to SBC members relate to the construction phase and issues of access in the longer term.

The construction and operation of a public transport system of the proposed size and nature will naturally require adaptation from the local community, both during construction and during operation. We acknowledge that the EIS highlights an extensive list of potential impacts, as well as measures to mitigate these risks.

There is a general acknowledgement and understanding that the construction of the light rail system will cause a period of disruption in the CBD. What has not been clearly articulated is the long-term impacts in particular in relation to future demolition and construction of buildings along the route but in particular in the so called pedestrianised

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section. Access for heavy vehicles such as cranes and trucks must be guaranteed into the future. The capacity for city buildings to be renewed is a basic requirement of a city.

Recommendation 1: That TfNSW acknowledges that there will be a need into the future for building renewal and that despite the restriction on vehicle access in the pedestrian zone and along the route that cranes and other heavy vehicles be assured access to permit the demolition/construction of buildings adjacent to the CSELR.

Despite the assurances that have been given about access for vehicles for freight delivery, emergency services vehicles, refuse collection, local resident access and hotel guests the SBC is aware of general concern about the arrangements for the area deemed the pedestrianised area between Hunter and Bathurst Streets and in particular the impact of the changes in the Hunter to Market Street block including for the large residential block on the Market Street corner.

The SBC believes that it will not detract from the principle of "pedestrianising" the Hunter to Bathurst Street section to include a single traffic lane adjacent to the light rail track that is accessible for local residents with a designated access-sticker at all times, freight and taxis at certain times. Given the proposed width of the footpaths and other beautification of the area we do not believe that this will detract from the form or function of the area.

Recommendation 2: That a single dedicated traffic lane be included from Hunter to Bathurst Streets with restricted access limited to residents, freight delivery, refuse collection, emergency vehicles, and taxis in general between 10pm-6am, a taxi carrying a person with a disability access should be able to set down or pick-up at any time and taxis exiting the Hilton Hotel at any time.

Recommendation 3: TfNSW undertakes a period of consultation with all building owners to develop a consensus as to whether the hours that freight can be delivered can be restricted.

Outside of the CBD, the removal of on-street parking will have some impact on businesses in locations along the light-rail route. The removal of car spaces must be accompanied with local parking strategies to ensure alternative parking spaces are available near these areas of business.

Changes to parking also needs to be paired with a communications program to ensure customers through appropriate signage are aware of car parking spaces, so that the removal of parking from the route does not deter customers from accessing these businesses.

This issue should also be the subject of significant consultation with businesses, both during consultation but also for an extensive period after construction to properly evaluate how the changes are operating.

Recommendation 4: TfNSW undertakes a period of consultation with businesses in local areas where there is to be a significant loss of parking to identify new parking spaces to ensure that the impact on business is minimised.

In addition to these general recommendations the SBC is aware of very site specific requirements around many of the major commercial buildings along the route. We are aware that key building owners will be making submissions in relation to specific sites and will seek guarantees in relation to access during construction and long term assurances around car park access.

Without seeking to repeat their submissions we give support in general to the recommendations. Whilst the SBC has given strong support to the CSELR project we believe it should form part of what will make the CBD an attractive place to live, work and visit but should not be the dominant feature. In other words the needs of the project in the construction phase and the operational phase should not be seen as of greater importance than other projects. A major commercial building with a mixed-use such as retail has the capacity to be a major generator of employment and economic turnover. Ensuring appropriate access is arguably as important as the light rail project. The purpose of the CESLR is to facilitate ease of access, the development of an efficient transport network and the creation of a more liveable CBD. Its development should not come at the cost of other significant projects. We accept that a project of the size and scope of the CESLR requires some adjustment and compromise. Hanging onto the baby and the bathwater is a good start.

We appreciate the opportunity to comment on the EIS and the opportunity that has been afforded to the SBC to work with TfNSW on planning for this significant project. Should any clarification of the submission be required please contact me on 9350 8101 or via patricia.forsythe@thechamber.com.au.

Yours faithfully

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**Executive Director**