

## **Submission on the CBD and South East Light Rail project Environmental Impact Statement**

Thank you for providing the opportunity to comment on this exciting new transport proposal. Let me begin by saying that I am highly supportive of light rail and very much want to see this project succeed. Having served as a Councillor on City of Sydney Council for the last five years I am aware of how congested our roads are becoming and know that light rail forms an important part of an integrated solution to this issue. With these statements in mind, please see below my comments on the CBD and South East Light Rail project proposal as set out in the EIS.

### **Community Engagement**

I am concerned that the community, particularly residents of Surry Hills, have not been adequately engaged with the process that has led to the development of the proposal outlined in the EIS. While the majority of affected residents accept that all major infrastructure projects come with some negative impacts it is essential that, given the scale of some of these impacts (e.g. loss of people's homes) the reasons for these be clearly justified.

So far, Transport for NSW and the Department of Planning and Infrastructure have failed to publically provide this justification. While the technical reasons for choosing an alignment that runs up Devonshire St and requires the demolition of Olivia Gardens may be sound, residents are in the dark about whether this is indeed the case or whether the proposed alignment was chosen for political reasons. In particular, there is a belief that the Devonshire St alignment was chosen to favour the Sydney Cricket Grounds and Fox Studios, who demanded that the line travel to their premises from Central Station via the shortest possible route in exchange for making a significant contribution to the funding of the project.

For such a large document the EIS contains virtually no information on why the proposed route was chosen over alternative suggestions, such as Oxford St and Foveaux St, despite the fact that questions from residents in this regard have generally resulted in them being referred back to the EIS. It is also so big, and the consultation period so short, that it is very easy to get lost searching for answers that may or may not be present.

Furthermore, many residents (at least 500) living in the high density Northcott public housing estate on Devonshire St do not have access to the internet at home, making reading the EIS an even more daunting task than it already is. While I note that hardcopies are available for viewing in a number of locations

it is unrealistic to expect that someone can glean much in the way of useful information while skimming through a 3000 page document in a government office.

I would request that, in order to in some way address the above issues, the consultation period be extended for at least another month – as this will mostly cover the Christmas and New Year period, where many departmental staff will be on holidays, I imagine delays that this would cause to the project will be very minimal. I would also suggest that TfNSW produce some kind of succinct ‘cheat sheet’ outlining in brief, simple terms, why the preferred route was chosen and host at least one community meeting to explain it further.

Furthermore, a mechanism needs to be put in place to allow local residents to provide proactive input into the project. A lifetime of living in an area can give a person insight that is hard to access for even the most skilled planner or engineer and this should not be ignored. Allowing residents to proactively shape the nature of the project will also give them a sense of ownership and help secure acceptance from the community.

All these expanded means of community input would be of great comfort to the people of Surry Hills – many of them are being asked to give up their homes and their community, they need to know that they are doing so for the right reasons and are being listened to.

### **Route choice**

It is concerning that the EIS, whilst listing a number of possible alternative routes considered for the light rail line through Surry Hills, makes virtually no mention of alignments that travel through other suburbs. Particularly noticeable by its absence is discussion of a route along Oxford St.

While many locals in Surry Hills have raised objections to the line going through their suburb, many Oxford St locals (mostly business owners on what is primarily a retail, not residential, street) have welcomed the idea of the line passing through their neighbourhood. Oxford St is a popular tourist destination but has been struggling in recent years as increasing car and bus through traffic have significantly damaged its amenity.

Having light rail run down the street, accompanied by the range of calming and amenity improving measures proposed for George St, would be a massive help to businesses in this culturally significant area. The line could then continue on towards Randwick and Kingsford, much as with the current proposal.

While there may be valid reasons for not pursuing this route, as noted above, these reasons have not been made clear to the public. The impression many people have is that the choice to run the route through Surry Hills was purely political and this is harming the public’s acceptance of the entire project. If the Oxford St route has been investigated and found not to be feasible, then this should be outlined in the EIS and other more accessible documents. If it

hasn't been investigated thoroughly then it should be, before TfNSW becomes any more committed to building the route via Surry Hills.

If a line along Oxford St has been ruled out of the current CSELR project care should still be taken to ensure the possibility is not precluded in the future. Minister Berejiklian has spoken favourably about possible future routes to Bondi and other parts of the eastern suburbs and for reasons discussed above Oxford St would be an ideal alignment for such routes. The current project should be designed so that an Oxford St line is able to connect with the existing network at the corner of Eddy Ave and Chalmers St at some point in the future.

### **Property Acquisitions**

There have been reports that residents whose properties are compulsorily acquired to make way for the light rail line, particularly residents of Olivia Gardens, will be reimbursed at a rate that is 10-30% below market value. I would hope that these reports are not true and would urge TfNSW to reconsider if they are.

A home is the most valuable asset most people ever own and to provide someone with anything less than its full value when it is taken away by forces outside that person's control is entirely unfair, effectively ruining a lifetime's worth of saving and financial decision making. Given the investment of time and emotion that many people also make in their homes over potentially decades of living there, it would be far more just to compensate those whose homes will be lost at above market value.

Equity issues aside, failing to compensate fully for the loss of homes will almost certainly result in court action against the government, damaging to the government's finances and reputation whilst potentially financially crippling the individuals involved and exacting a significant emotional toll. I would urge TfNSW to avoid this possibility entirely by publically committing to compensation rates that are at market value as a bare minimum from the outset of this project.

### **Ward Park**

The EIS states that around 3200m<sup>2</sup> of Ward Park, Surry Hills, will be used as a construction zone. I would urge TfNSW to consider moving as much of this as possible to another location.

Ward Park is the main area of local open space for the Northcott Housing estate which is home to over 1000 people. More than 60% of the occupants are over 60 years of age and many have chronic health problems, meaning that they are limited in their ability to access more distant open space. It is also widely used by local parents and dog walkers.

For all these reasons I would urge TfNSW to relocate as much as possible of the construction zone planned for Ward Park to Moore Park. Unlike Ward Park Moore Park is not surrounded by residential development on all sides

and a much larger proportion of its users come from outside the area and thus have more capacity to go elsewhere – it is regional rather than local open space.

Surry Hills residents are being asked to sacrifice a lot for this project – asking them to give up Ward Park for five years is too much

For the same reasons, the development of the platform at Ward Park, and the subsequent changes made to the park as a result, must be sympathetic to the needs of elderly people and people with mobility limiting disabilities. Whilst I acknowledge that all stops are intended to be constructed based on principles of universal access it is of extra importance that the surrounds of this stop also comply with those principles.

### **Moore Park**

The decision to have the route traverse Moore Park via a tunnel instead of a viaduct is most welcome – a viaduct would result in significant irreversible damage to one of modern Australia's oldest and best loved parks.

While Moore Park is a preferable location to Ward Park for construction facilities while the project is being built TfNSW must make a commitment to return it to its current level of functioning once the construction phase is complete. Moore Park is part of the City's regional open space network and provides healthy outdoor recreational opportunities for people across inner Sydney.

Along with the benefits it provides to the human population of the City Moore Park also has significant value to urban wildlife, with the City's draft Urban Ecology Strategy listing it as a priority site. Two species of bats have been recorded there and nowhere else in the LGA, whilst it is also the only site to host epiphytic ferns with two different species found growing on mature fig trees (illustrating the benefits of retaining existing trees over removing and replacing them, as discussed further below).

It is essential that the construction and operation don't compromise the ecological values of this important urban oasis. To this end, construction works should be staged to avoid sensitive times, such as nesting periods for rare birds that may be found in the area.

Whilst restoring the site after the conclusion of the construction phase should be a top priority, it is important that interim measures are taken during the construction phase to ensure the transition from the park's current state to a restored future state is as seamless as possible. Actions such as setting up nest boxes straight away (prior to carrying out replacement planting) if large trees are removed are the kind of transition measures that will ensure both long and short term damage to the park is minimised as much as possible.

### **Trees**

The loss of 140 trees in Surry Hills as a result of the construction of this project is regrettable. While the loss of some trees will be inevitable I would urge TfNSW to do all it can to minimise the loss of existing trees – replacement trees are welcome but due to the practical limitations on the size of new trees, and the likelihood that not all new trees planted will survive – replacement of trees should be a last resort only when removal of a tree cannot be avoided.

I note that TfNSW have stated their intention to replace lost trees at a ratio of 8:1. While this is a generous ratio I am concerned that it is somewhat arbitrary and not based on research into the local area. The City of Sydney has an ongoing program to double canopy cover within the Local Government Area and the largest factor currently limiting the roll out of this program is finding available space in which new trees can be planted.

I hope that TfNSW is able to replace any lost trees at a ratio of 8:1 but I fear that this may not be possible. In the meantime, I am concerned that the promise of a generous replacement rate may make TfNSW less willing to find alternatives to tree removal than it otherwise would be, only to later find that the replacement rate cannot be achieved. I would thus urge TfNSW to undertake thorough research into possible locations for 1120 replacement trees before it begins removing any of the 140 trees slated for possible loss from Surry Hills.

### **Access to businesses**

All care must be taken to ensure that businesses along the route are able to operate throughout the construction period. Construction should be staged so that businesses are able to maintain access ways for customers and deliveries throughout the construction period and compensation should be paid for any periods where a business is unable to keep up this minimum requirement.

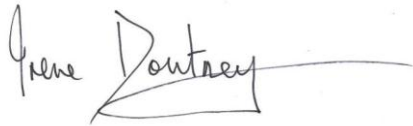
TfNSW and construction contractors should also take all practical actions to ensure that the community are aware that affected businesses remain open during the construction period. Measures such as allowing businesses to place signage on construction hoardings and providing information about business operations on the project website, both at no charge to the businesses themselves, are two possible ways TfNSW can assist businesses during construction. This is particularly important along the Surry Hills section of the line where many businesses are already struggling without the added burden of operating in a construction zone.

TfNSW must ensure that the project is designed in such a way to allow businesses to continue operating once construction has been completed. Roadways, particularly the pedestrianised section of George St, must be designed so that businesses are able to access deliveries without compromising pedestrian safety or the amenity of this section of the route. TfNSW should consider funding the construction of new delivery access routes if it is not possible for delivery vehicles to co-exist with the new streetscapes that will result from this project.

## Conclusion

Thank you for providing the opportunity to comment on the CSELR project. Whilst the short consultation period has precluded a more detailed analysis of the EIS I hope you will be able to take my comments here on board and I would once again urge that the period for accepting submissions be extended so that more community members can provide more detailed input on this important project.

Regards

A handwritten signature in black ink, appearing to read 'Irene Doutney', with a long horizontal line extending to the right.

Councillor Irene Doutney  
City of Sydney Council