

Department and Planning and Infrastructure
CBD and South East Light Rail Project – SSI 6042
23-33 Bridge Street
Sydney NSW 2000

We refer to the Environmental Impact Statement in respect of the Sydney CBD and South East Light Rail Project submitted by Transport for NSW.

The Devonshire Street Route

We oppose the Devonshire Street route through Surry Hills proposed by Transport for NSW. The proposed route will significantly alter the character of a substantially residential area.

There are a number of existing roads that traverse Surry Hills (in particular Foveaux Street and Albion Street) that are wider and more suitable for the proposed development. Those streets are presently used by the buses that are to be replaced by Light Rail.

We appreciate that those routes have potential challenges, in particular due to the existing gradient. However, those challenges appear to be less significant than the challenges (and associated costs) posed by the proposed Devonshire St route, including:

- the need to compulsorily acquire and demolish a substantial residential apartment building (Olivia Gardens);
- the need to construct a tunnel under Moore Park;
- the need to construct a tunnel under Anzac Parade; and
- the need to permanently close the westbound lane of a significant stretch of Devonshire St.

Having regard to those challenges and the impact on residents of running the Light Rail along what is currently a quiet, narrow residential street rather than wider roads that are already used for public transport, it is difficult to understand how Transport for NSW has reached the conclusion that the Devonshire Street route is to be preferred. No real guidance is provided in the Environmental Impact Statement or in any other material published by Transport for NSW.

The only real commentary on the issue in the EIS is in Chapter 13.2, which states:

“Community concerns about the Foveaux Street alternative related to necessarily displacing people from their homes when alternative routes with less perceived impacts were available.”

This statement is so absurd that it is presumably an error. It could not possibly be suggested that the Devonshire Street route, with the forced displacement of an entire apartment block of residents, would involve “less perceived impacts” in terms of displacement than the Foveaux Street alternative, which would not need to involve any displacement of residents.

Transport for NSW claims to have a report that supports its decision to adopt the Devonshire Street route. However, it has refused to make that report public. There could not possibly be any commercial in confidence reason or privacy reason for refusing to make such a report public or overriding public interest against the disclosure of such a document. One is therefore left with the suspicion that, if such a report does exist, it does not in fact make a compelling case for the Devonshire Street route.

We are not unreasonable people. We support Light Rail and accept that, whatever route is adopted, there will be adverse impacts on some residents of Surry Hills. However, we

believe we are at least entitled to be satisfied that all options have been considered in detail and that there are good reasons (not immediately apparent) why the Devonshire Street route is to be preferred. If a report meeting that description were made available, then we would accept Transport for NSW's decision. In the absence of such a report, one can only conclude that it is bureaucratic inertia, rather than reasoned decision making, that is supporting Transport for NSW's adherence to the Devonshire Street route.

Given Transport for NSW refuses to make such a report available, ***we submit that DPI should make it a condition of approval that Transport for NSW obtain and make public an independent report providing a detailed assessment of the various options for crossing Surry Hills.*** If that report does not support the Devonshire Street route, then Transport for NSW should be required to amend the proposal to adopt a different route.

If an independent report does conclude that Devonshire Street is the best route, then we make the following submissions in relation to the detailed design of that route.

The Wimbo Park / Olivia Gardens precinct

The demolition of Olivia Gardens will create a substantial open space that, potentially, could be developed for the benefit of local residents. However, that potential is severely circumscribed by the proposal that the Light Rail pass through the middle of that area.

Therefore, ***we submit that it should be a condition of approval that the Light Rail be placed as far to the north or south of the Wimbo Park / Olivia Gardens precinct as possible, within the constraints imposed by the existing buildings at the South Dowling Street end of the area.***

Whatever the ultimate alignment of the Light Rail, there is a very real risk that demolition of Olivia Gardens will create a corridor that will be unusable by residents and, almost inevitably, attract anti-social behaviour. So far, it appears that little thought has been given to this issue. For example, while the EIS suggests that "there would be the potential to create a new park or open space area within the site of the current Olivia Gardens apartment complex following completion of construction", it is difficult to see how the area could safely be used as a park when large Light Rail Vehicles will be passing through the area every few minutes.

Therefore, careful thought needs to be given to developing the area in such a way that it will be attractive to and useable by residents. In particular, ***we submit that:***

- ***the Wimbo Park / Olivia Gardens precinct should have no overhead wires*** – the absence of poles and wires will make the space significantly more attractive and, given how short this stretch of track will be compared to the stretches between stops along George Street in the CBD, there is no reason why this could not be a condition of approval;
- ***the Light Rail Vehicles should be limited to a maximum speed of 20 kilometres per hour through the Wimbo Park / Olivia Gardens precinct*** – this would make the area more usable as open space (even if not as a park for children) and, given the lack of visibility as the Light Rail Vehicles approach South Dowling Street and Bourke Street that would necessitate those intersections being approached slowly in any event, this is not an unreasonable condition;
- ***Transport for NSW should be required, as a condition of approval, to develop a plan for the Wimbo Park / Olivia Gardens precinct in consultation with the City of Sydney Council and local residents.***

Local traffic access in and around Parkham Street

There is no explanation anywhere in the EIS of how access will be achieved from properties on Parkham street or the section of Bourke Street that access their properties

via Parkham Street (580-588 Bourke Street). Presently these properties exit via Parkham Place onto Nobbs Street, which it would appear from the EIS (although it is not clear) will not be retained (the only reference is at 4.3.3 of Technical Paper 2, which says "*the light rail alignment precludes access to existing Langton Centre off street parking at Parkham Place.*")

We have been informed at Transport for NSW information sessions, prior and subsequent to the release of the EIS that Parkham Lane, which currently ends at Olivia Lane, will be extended to Bourke Street to allow access to those properties. However, this would mean that in order to travel north or west (or to the City), a resident would have to travel east along Parkham Street, west down Parkham Lane, south along Bourke Street back past Parkham Street, east again along Cleveland or Ridge Street, north along South Dowling Street and finally west again along Foveaux Street.

If the two-way part of Bourke Street were extended to Parkham Lane (only some 5 metres), to allow traffic exiting Parkham lane to turn right onto Bourke Street (and thereby continue north along Bourke Street) this would avoid the need to effectively circle the block twice.

Therefore, ***we submit that it should be a condition of approval that traffic be allowed to turn right from Parkham Lane into Bourke Street, assuming Parkham Lane is extended to Bourke Street.***

Alternatively if it is not proposed to extend Parkham Lane to Bourke Street then further consultation should occur with effected residents about traffic re-routing for those properties that currently exit via Parkham Place. In this regard we note that on three separate occasions (early 2013 at an information stand at the Entertainment Quarter, at our house in or around September 2013 and at a Transport for NSW information session at the Adina on Crown Street prior to the release of the EIS) we have been assured by Transport for NSW that none of the routes being considered for the light rail would require acquisition/demolition of our property. However, at least two of the routes documented in, and considered by, the EIS pass straight through our property and would necessarily require its demolition.

Therefore, ***we submit that should Parkham Lane not be extended to Bourke Street and allow for a right hand turn then it should be a condition of approval that further consultation be had with effected residents in relation to traffic access from Parkham Street (and 580-588 Bourke Street).***

The EIS also suggests that access to the Olivia Gardens site will initially be via Bourke Street but as soon as possible via South Dowling Street. This will cause significant congestion around Parkham Place, which although presently two-way is a very narrow lane. Accordingly, ***we submit that the traffic re-routing for Parkham Street via Parkham lane should be put in place prior to construction vehicles beginning to access the Olivia Gardens site via Parkham Place.***

Construction in and around Olivia Gardens

Demolition of Olivia Gardens is clearly a significant task. However, the area around Olivia Gardens is entirely residential (save for the bakery that operates during normal business hours). Accordingly, ***we submit that construction in and around Olivia Gardens should only take place during the usual approved City of Sydney construction hours that residents are required to adhere to (i.e. from 7:30am on weekdays and 8am on Saturday) and not after 6pm on weekdays or 1pm on Saturdays and not on Sundays at all.***

Any requested variation to those normal construction hours should be required to be subject to further consultation with effected residents so that appropriate conditions and/or compensation can be agreed.

Summary of submissions

1. That DPI should make it a condition of approval that Transport for NSW obtain and make public an independent report providing a detailed assessment of the various options for crossing Surry Hills.
2. That DPI should make it a condition of approval that the Light Rail be placed as far to the north or south of the Wimbo Park / Olivia Gardens precinct as possible, within the constraints imposed by the existing buildings at the South Dowling Street end of the area.
3. That DPI should make it a condition of approval that the Wimbo Park / Olivia Gardens precinct should have no overhead wires.
4. That DPI should make it a condition of approval that Light Rail Vehicles should be limited to a maximum speed of 20 kilometres per hour through the Wimbo Park / Olivia Gardens precinct.
5. That Transport for NSW be required, as a condition of approval, to develop a plan for the Wimbo Park / Olivia Gardens precinct now in consultation with the City of Sydney Council and local residents, not merely leave it to the City of Sydney at some point in the future.
6. That DPI should make it a condition of approval that traffic be allowed to turn right from Parkham Lane into Bourke Street, assuming Parkham Lane is extended to Bourke Street.
7. That DPI should make it a condition of approval that the traffic re-routing for Parkham Street via Parkham lane should be put in place prior to construction vehicles beginning to access the Olivia Gardens site via Parkham Place.
8. If 6 above is not imposed, DPI should make it a condition of approval that further consultation be had with effected residents in relation to traffic access from Parkham Street (and 580-588 Bourke Street).
9. That DPI should make it a condition of approval that construction in and around Olivia Gardens should only take place during the usual approved City of Sydney construction hours that residents are required to adhere to (i.e. from 7:30am on weekdays and 8am on Saturday) and not after 6pm on weekdays or 1pm on Saturdays and not on Sundays at all and any variation to those hours be the subject of consultation with residents.

Please contact us if you have any questions in relation to this submission.

Yours faithfully

Bridget Thomson

Cameron Hanson