

16 December 2013

Mr S Haddad  
Director-General  
NSW Department of Planning and Infrastructure

*Submitted online*

Dear Mr Haddad,

**RE: Public Submission – CBD and South East Light Rail Project (SSI 6042)**

This submission relates to the State Significant Infrastructure application for the CBD and South East Light Rail (CSELR) Project (reference number: SS1 6042), submitted by Transport for NSW.

We express in-principle support for light rail in south-eastern Sydney and the remodelling of the road and pedestrian networks in the Sydney CBD to ease congestion during peak periods. However, the proposal in its current form has the potential to negatively impact travel efficiency and level of public transport access in areas outside of the immediately catchment of the light rail proposal in south-eastern Sydney, namely Coogee, Maroubra, Matraville, Eastgardens, Malabar, Little Bay and La Perouse.

Our specific issues and concerns relating to the proposal and the level of information provided in the Environmental Impact Statement (EIS) prepared by Parsons Brinkerhoff and accompanying the application are set out below.

**1. Capability of proposed light rail to support existing population and projected urban growth in South-Eastern Sydney**

While we support the introduction, or rather the reinstatement, of light rail to the area, the proposal in its current form will not equally provide for greater public transport capacity and access across the wider subregion of south-eastern Sydney given the network will terminate at Kingsford and Randwick. Enhancing the capacity and frequency of public transport in the area is paramount given current and future growth in housing and employment brought about by the following:

- introduction of two urban activation precincts in the Randwick local government area;
- part redevelopment of the British American Tabaco Australia site adjacent to Westfield Eastgardens; and
- the completion of the redevelopment of the Prince Henry Hospital site in Little Bay.

The presently proposed CSELR that will terminate at Kingsford and Randwick is perceived as primarily catering for the sporting and entertainment precincts in Moore Park, the specialised health and education precinct in Randwick and Kensington, and inevitable growth in housing and employment generated by the Randwick Urban Activation Precinct initiative. The CSELR will expectantly fall short in supporting existing

population and the projected growth in housing and employment for south-eastern suburbs outside of the immediate catchment area of the CSELR.

Metropolitan strategies (current and draft), transport master plans and other strategic plans released by the NSW Government have identified long-term investigations of extending light rail to Maroubra Junction and Malabar. Given the expected changes to current zoning and building height and floor space ratio development standards in the Anzac Parade South Urban Activation Precinct (UAP), Transport for NSW should commit in the short-term to extend the light rail network to Malabar and beyond to La Perouse. Extending the light rail network beyond Kingsford would be the key ingredient in driving urban renewal within the Anzac Parade South UAP. If the NSW Government is adamant in increasing population densities along Anzac Parade then the extension of light rail to La Perouse should form part of the infrastructure improvements associated with renewal strategies for the Anzac Parade South UAP.

Further to the Anzac Parade UAP, the recently rezoned surplus parcel of the British American Tobacco Australia site, adjacent to Westfield Eastgardens, will have the potential to accommodate potential to accommodate up to 1,600 dwellings and 35,000 m<sup>2</sup> of retail and commercial floor space. The growth in housing and employment for the site will obviously generate demand for public transport capacity and access within the area as well as on the existing road network. Transport for NSW should consider an offshoot line from Maroubra Junction via Maroubra Road or Kingsford via Bunnerong Road to Westfield Eastgardens to cater for the projected housing and employment growth in this emerging centre.

## **2. Integration of light rail with existing bus network in South-Eastern Sydney**

The CSELR proposal has generated great uncertainty on the longevity of direct bus services connecting south-eastern Sydney suburbs to the CBD. The EIS has not provided a detailed impact assessment of the CSELR on existing bus network post construction and during operation in relation to its integration with bus services outside of the catchment area, including suburbs like Maroubra, La Perouse, Eastgardens, Matraville, Malabar and Coogee. Further, the EIS does not comprehensively address the proposal's impact on public transport access in and out of the catchment area. We note these matters were raised in the Director General's Requirements issued for this application.

The EIS has provided detailed design specifications of the interchanges at Randwick and Kingsford, suggesting that city-bound services will inevitably terminate at Kingsford and Randwick to transfer passengers onto the light rail network. From the discussion in the EIS, areas south of Kingsford would be affected the most in terms of public transport efficiency and access. Terminating bus services at Kingsford and shifting bus commuters onto the light rail network would be distributive given associated waiting time changing from one mode to another as well as the availability and capacity of light rail carriages to accommodate the expected 1,400 bus passenger transfer per hour rate for the Kingsford interchange in 2021 (Parsons Brinkerhoff 2013, p.5-81). This rate would equate to 14 and 15 buses per hour. Currently there are at least 20 or 25 city bus services that pass Kingsford per hour during morning and afternoon peak periods.

Several sections of the EIS have implicitly stated that the introduction of the CSELR would significantly reduce the need to retain direct bus services to the CBD, particularly express services operating during peak periods along Anzac Parade such as X94, X96, X97 and X99. As a commuter to the city from Maroubra Beach during morning peak hour, most express buses are almost full past Maroubra Junction. The cessation of these services would significantly reduce the efficiency of public transport access to key business and employment centres, such as Sydney CBD, in peak periods for city-bound commuters outside of the direct service catchment of the CSELR. Further, reducing direct and continuous bus services would also impact on public transport access for aged and less-mobile commuters. Some of these commuters would find it difficult or inconvenient to shift from one mode to another for a journey that currently involves one mode of transport.

In order to maintain seamless and efficient public transport access to the CBD during peak periods, we suggest Transport for NSW consider operating express city-bound bus services along the M1 from the Wentworth Avenue entrance to Southern Cross Drive, commencing from areas south of Kingsford, such as La Perouse, Little Bay, Maroubra Beach, South Maroubra and Maroubra Junction. This arrangement was temporarily in place during the World Youth Day event in July 2008 and was extremely efficient as a bus from Maroubra Beach to the city took approximately 15 minutes. Utilising the M1 for express bus services during peak hour would be a desirable solution as in interim diversion arrangement during the construction of the CSELR and as a long term solution to integrate with the light rail network if it is only to terminate at Kingsford.

We acknowledge that Transport for NSW will ultimately decide on the restructure of the existing bus service network in light of the CSELR. In this regard, the flow-on effects of the CSELR on the existing bus network should be comprehensively considered in the planning phase of this project as opposed to during the construction or commencement of the light rail network. A comparison of travel times between the existing bus services and the proposed light rail services would greatly assist in addressing this concern as we note this is absent in the EIS. Further, Transport for NSW should clarify whether current express bus services operating along Anzac Parade to the CBD will be maintained following the commencement of the CSELR.

### **3. Easing congestion in Sydney CBD**

We welcome that Transport for NSW is seeking to improve the efficiency of the CBD road, pedestrian and public transport networks during peak periods. It is frustrating that a bus trip can take over 25 minutes along Philip, Elizabeth and Liverpool Streets from Circular Quay to Oxford Street during afternoon/evening peak hour.

We note in NSW Government key strategy documents, namely in the City Centre Access Strategy, the emphasis in reducing of bus services operating in the CBD during peak hour as the primary means of easing congestion. Reducing the frequency of buses in the CBD should not be the only means of easing congestion. A congestion tax for private vehicles during peak hour should be part of this overall action in easing traffic congestion. Congestion tax systems are successfully implemented in comparable international cities and would effectively work for Sydney in reducing unnecessary private vehicular trips in the CBD during peak hour.

## **Conclusion**

We do not object to the overall intent of the CSELR proposal. Our concerns centre on the current form of the proposal, which we believe will struggle to deliver a reliable, efficient and convenient public transport network to serve the current and projected populations of the wider south-eastern Sydney area. We urge Transport for NSW to reconsider the current proposal and commit to extending the light rail network to service existing and emerging centres from Kingsford to La Perouse. This is particularly vital given inevitable urban growth in these centres that will be expedited by the State-led Anzac Parade South Urban Activation Precinct initiative. The light rail network could also be extended to Coogee Beach, from the currently proposed Randwick terminus, and also to Maroubra Beach to achieve a consistently accessible light rail network in south-eastern Sydney.

We request that Transport for NSW clarify the future of the existing bus network in south-eastern Sydney in light of the introduction of the CSELR. Many commuters in south-eastern Sydney, particularly elderly and less-mobile commuters, rely on the existing bus network for continuous and direct public transport access to the CBD and beyond. It would be greatly disappointing if the CSELR compromises existing bus services directly connecting areas outside of the direct catchment of the CSELR to the CBD.