Bolted Pty Ltd & Actium Properties Pty Ltd
c/- Built NSW Pty Ltd
Level 7, 343 George St
Sydney NSW 2000
Att: Oliver Johnstone

16 December 2013

Mr Sam Haddad
Director-General
NSW Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Sir,

CBD & SOUTH EAST LIGHT RAIL PROJECT (SSI 6042)

Thank you for the opportunity to make a submission on the CBD and South East Light Rail Project. This submission is made by Bolted Pty Ltd & Actium Properties Pty Ltd which owns the land at 4-12 Doncaster Avenue, Kensington which adjoins the western edge of the Royal Randwick Racecourse and the proposed location of the Randwick stabling facility. We are responding on behalf and have the support of the adjacent properties of 14-26 Doncaster Avenue who are equally affected.

Attached is a submission prepared by JBA Planning (JBA) which highlights:

- the inappropriateness of locating a stabling facility adjacent to a residential area;
- the adverse impacts that will result from the proposal on current and future residents of Doncaster Avenue and the Racecourse Heritage Conservation Area; and
- the various deficiencies in the Environment Impact Statement and supporting documentation.

In addition to the technical matters raised by JBA, we are concerned about the inevitable reduction in property values that will result from the proposed stabling facility. Instead of looking out to substantial and picturesque trees that have exceptional aesthetic and historical value, Doncaster Avenue residents will have as their primary view an ugly, industrial tram stabling facility and overhead wires and a facility that impacts upon their amenity. Due to these issues the current and potential future value of the land will be impacted. An article in the Sydney Morning Herald on 30 November 2013 noted that recent residential land sales in Wansey Road may have been devalued by the plan to run the light rail line down that street. The situation will be even worse for Doncaster Avenue residents whose amenity will be heavily impacted.

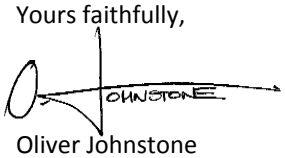
If the stabling facility goes ahead in the proposed location, compensation via appropriate height and FSR uplifts is necessary to offset likely impacts and the consequential reduction in property values. This should be done via the forthcoming Randwick Urban Activation Precinct (UAP) process. The preliminary maps for the Randwick UAP indicate that the maximum height and FSR will be increased but only by a marginal amount. To allow the Doncaster Avenue residents to plan for these changes in conjunction with the implementation of the light rail system, we request that the height limit for 4-12 Doncaster Road be changed to 25m and the FSR be changed to 3:1.

There needs to be better co-ordination between the light rail project and the Randwick UAP to ensure an integrated and holistic planning process. Bolted Pty Ltd & Actium Properties Pty Ltd will be making further submissions on the Randwick UAP at the appropriate time.

Given the significant issues raised by the proposed stabling facility and the direct impacts on 4-12 Doncaster Avenue, we are concerned by the lack of prior consultation with us by Transport for NSW and we believe a meeting is necessary to discuss our concerns.

Please contact Oliver Johnstone to discuss the issues raised in this submission on 0411 144 467.

Yours faithfully,



Oliver Johnstone

13592
16 December 2013

Mr Sam Haddad
Director-General
NSW Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Sir

CBD & SOUTH EAST LIGHT RAIL PROJECT (SSI 6042)
SUBMISSION ON BEHALF OF BOLTED PTY LTD & ACTIUM PROPERTIES PTY LTD

Thank you for the opportunity to make a submission on the CBD and South East Light Rail Project (the **CSELR Project**). This submission has been prepared on behalf of Bolted Pty Ltd and Actium Properties Pty Ltd (the **Owners**) which own the land at 4-12 Doncaster Avenue, Kensington. The land adjoins the western edge of the Royal Randwick Racecourse and the proposed location of the Randwick stabling facility. It is located in the 'Randwick precinct' for the purposes of the CSELR Project.

The Owners support the CSELR Project in principle. Their land is located in the inner South-East suburbs of Sydney which have a number of key destinations that generate high levels of transport demand. In addition, the Randwick Urban Activation Precinct is proposed to provide for future population growth in Randwick, Kensington and Kingsford. The existing transport system does not have the capacity to support future growth.

However, the Owners do not support the proposal for the Randwick stabling facility which will operate with regular activity on a 24-hour basis immediately adjacent to existing residences. The stabling facility will be used for:

- Temporary overnight stabling with capacity for 41 light rail vehicles (**LRVs**);
- Interior LRV cleaning (mopping, sweeping, vacuuming of LRVs) including wash plant;
- Light maintenance and repair work, including vehicle sanding;
- Staff facilities, including the operational control centre and light rail operator facilities;
- A traction substation; and
- Unloading and storage area.

EXECUTIVE SUMMARY

In summary, the Owners' concerns relate to the following issues:

- **Noise impacts:** The stabling facility will have adverse noise impacts on current and future residents of 4-12 Doncaster Avenue and the Environmental Impact Statement (**EIS**) does not provide any certainty about whether mitigation measures will be implemented.
- **Vibration impacts:** The EIS provides an assessment of vibration and ground-borne noise from LRVs in operation along the light rail alignment, but does not provide such an assessment from the stabling yard on Doncaster Avenue residential properties. Transport for NSW should

demonstrate that the potential vibration and ground-borne noise impacts from the stabling yard on adjoining residential properties are acceptable.

- **Visual impacts and urban design:** The EIS acknowledges that the stabling facility will have "high adverse visual impact" when viewed from the Doncaster Avenue properties, resulting from the removal of existing substantial trees of exceptional and high aesthetic and historic significance, light rail stabling, provision of catenary structures and overhead wiring, a noise attenuating wall along the western boundary creating long shadows (if implemented), glare and reflection off metallic surfaces, and night time impacts associated with light spill from overhead lighting. Despite these significant impacts, no mitigation measures are proposed other than glare and light spill minimisation. In addition, it is now standard practice for significant developments to demonstrate design excellence. A proposal to develop an open and unsightly light rail stabling facility immediately adjacent to residential properties with no regard to urban design is inconsistent with this standard practice.
- **Heritage impacts:** Neither the EIS nor the Heritage Impact Statement includes any heritage impact assessment of the proposed stabling facility on the heritage items adjoining the site at 10-12 Doncaster Avenue. In addition, the Heritage Impact Statement concludes that the proposal will have a "major adverse impact" on the heritage significance of the Racecourse precinct heritage conservation area. This stark finding has evidently been completely disregarded in the decision to provide the stabling facility in this location.
- **Flooding impacts:** The stabling yard site is known to flood and is the location of an existing overland flow path during flood events. In order to protect the stabling facility the EIS indicates that levels at the facility could be raised. However, this would lead to a reduction in the current flowpath as well as loss of significant storage for local or regional flood events. The impact on flood events from filling has not been assessed in the EIS. Transport for NSW should provide details of the proposed solution to flood protect the stabling facility, and demonstrate that it will not cause exacerbated flood impacts on surrounding properties. At this stage it is not clear whether compliance with the NSW Floodplain Development Manual can be achieved.
- **Safety and security:** Transport for NSW proposes to include a 4.5 metre buffer between the stabling facility and adjoining residential properties. LRVs will be stabled adjacent to this buffer zone overnight, blocking the buffer zone from view from most of the stabling facility site. This raises obvious safety and security issues for staff of the stabling facility as well as the residents of Doncaster Avenue. Neither the EIS nor the Social Impact Assessment (SIA) assesses the safety and security impacts associated with the buffer zone. A full CPTED assessment should be undertaken prior to determination of the application and the community should be given an opportunity to comment on it.
- **Vehicle access:** There are inconsistencies within the EIS as to whether the vehicle accesses to the stabling facility from Doncaster Avenue will be entry only, exit only or both. The impacts of the proposed vehicle access arrangements on the Doncaster Avenue properties cannot be properly assessed.

This submission first outlines the relationship between 4-12 Doncaster Avenue and the proposed stabling facility site, and then sets out the Owners' concerns.

1.0 4-12 DONCASTER AVENUE

4-12 Doncaster Avenue is located on the western edge of the Randwick Racecourse (see **Figure 1**). The site is made up of a number of allotments, with a total area of approximately 3,080m^2 and a total frontage to Doncaster Avenue of approximately 77 metres. Existing on the site at 4-8 Doncaster Avenue is a single-storey dwelling. A pair of heritage listed two-storey terraces is located at 10-12 Doncaster Avenue.

Figure 1 – 4-12 Doncaster Avenue, Kensington

The surrounding locality is characterised by predominantly low to medium scale residential development. Doncaster Avenue includes a number of 3-4 storey residential flat buildings and there is a 12-storey residential flat building in Abbotford Street, only 150m from Doncaster Avenue. Randwick Racecourse is located to the east of the site and Centennial Parklands is located to the north.

The land adjoins the western edge of the proposed location of the Randwick stabling facility (see **Figure 2**).

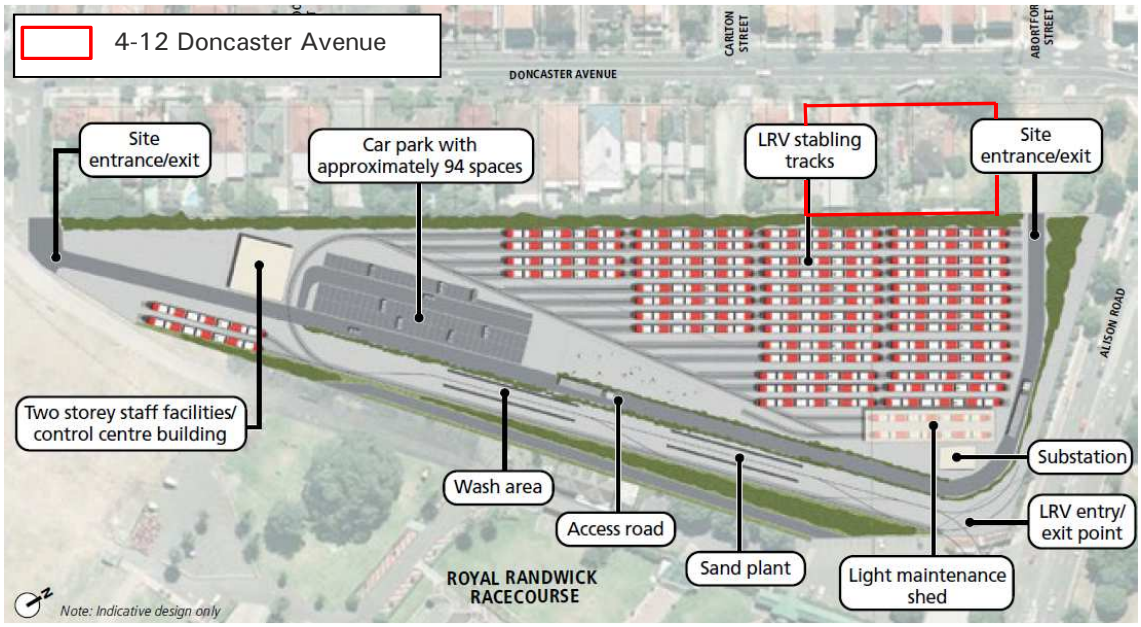


Figure 2 – 4-12 Doncaster Avenue in relation to the proposed Randwick stabling facility (source: EIS page 5-70)

Under the *Randwick Local Environmental Plan 2012*, the site is zoned R3 Medium Density Residential in which residential flat buildings (amongst other land uses) are permissible with consent. A maximum floor space ratio (FSR) of 0.9:1 and a maximum height of 12 metres applies to the site. The NSW Department of Planning and Infrastructure proposes to amend the controls for the site and surrounding area as part of the Randwick Urban Activation Precinct (**UAP**). Preliminary documentation available online suggests that the current zoning will be maintained, that the maximum FSR will be increased to 1.5:1 and that the maximum building height will also be increased.

2.0 OWNERS' SUBMISSION

The Owners support the proposal for a light rail stop in the vicinity of the Royal Randwick Racecourse. The stop will be located only a 3 minute walk from 4-12 Doncaster Avenue and this will support better transport solutions for events at the Royal Randwick Racecourse as well as increased density in this location, consistent with the intentions of the Randwick UAP.

However, the Owners have a number of concerns with the proposed stabling facility adjacent to 4-12 Doncaster Avenue. The indicative layout of the stabling facility provides only a 4.5 metre buffer between the stabling yard and adjoining residential properties. This has obvious consequences in terms of noise and visual impacts unless those impacts are adequately mitigated.

In addition, the EIS provides no certainty that the impacts associated with the stabling facility operations will be mitigated and/or managed.

In any event, it is not appropriate to locate a stabling facility in a relatively high density, inner city residential area, particularly one that is set to undergo further growth under the Randwick UAP. It is too difficult to implement effective noise attenuating measures that will also have acceptable visual impacts. Because of this tension, the site is considered to be unsuitable for the proposed facility.

The stabling facility should instead be located at the alternative location adjacent to Wansey Road which was considered in the EIS options analysis. The EIS (section 4.5.1) describes this alternative location as providing a "key benefit" over the Doncaster Avenue site as it is generally situated below the surface of Wansey Road residents, providing some screening for noise and visual

impacts of stabling facilities. However, this alternative option was disregarded because of the additional time it would take to get to Kingsford and Circular Quay stops and the "likely" additional costs associated with land acquisition and relocating horses.

These reasons are inadequate considering the significant impacts that will result from the stabling facility on the Doncaster Avenue residents. The additional travel time to the Kingsford and Circular Quay stops would be minor relative to the total time it would take to get to Kingsford and Circular Quay. In relation to cost, the reference to "likely" additional costs suggests that these costs were not investigated or quantified. Given the current and approved uses at the location of the proposed stabling facility it is difficult to understand how this option would involve savings in terms of land acquisition costs.

Details of the Owners' concerns are set out below.

2.1 Noise impacts

Noise impacts associated with the LRV stabling operations will include noise from power converters, air-conditioning and track brake tests, as well as on-site vehicle movements. Further, it is unclear whether bell tests will also be carried out at the Randwick stabling facility. On the one hand, the EIS (section 15.5.2, page 15-53) states that bell tests will be carried out, whereas the Noise Technical Paper (section 8.4.1) states that warning bells will not be tested in the stabling yard. This inconsistency should be resolved and if bell tests will be carried out, they should be included in the noise modelling.

Noise modelling has confirmed that without any noise mitigation, a large number of residential properties in the vicinity of the stabling facility would experience noise levels in exceedance of the applicable noise goals under the NSW Industrial Noise Policy.

The Noise Technical Paper does not provide noise impacts for 4-12 Doncaster Avenue. However, due to the location of 4-12 Doncaster Avenue it is expected to be reflective of the 'most affected receptor'. As such daytime noise (unmitigated) from the stabling facility is expected to exceed the 'Operational Noise Goal' LAeq (15-min) by 8-11 dBA, with evening exceedences of 7-10 dBA and night-time exceedences of 14-17 dBA. Maximum noise (LA_1) is expected to exceed the noise goal by 3-11 dBA. These impacts are clearly unacceptable.

The EIS states that a six metre high noise barrier alone would not be sufficient to adequately mitigate night-time noise impacts (on all floors) or daytime and evening noise impacts on upper floors (i.e. above ground and first floors). With the ability to build to four storeys under the Randwick LEP currently, and presumably higher under the Randwick UAP, this means a six metre high noise barrier would not adequately protect existing or future residential development at 4-12 Doncaster Avenue.

A partially enclosed acoustic shed was also modelled, to be enclosed on the western façade and roof, with the northern, eastern and southern facades completely open. With the inclusion of an acoustic shed compliance with the noise criteria could be achieved at all receptors during the daytime or evening periods, but would be exceeded at up to five receptors during the night-time period. These five receptors are located in two buildings adjacent to the site exit, which is expected to include 4-8 Doncaster Avenue (although this is not clear). Staff cars leaving the site would be the primary source of the predicted noise. The EIS states that Alison Road noise would mask this noise, however traffic noise from Alison Road is already accounted for in setting the noise criteria so it is unclear whether 'masking' of noise in this way is an appropriate consideration.

The EIS does not commit to any form of impact mitigation. The EIS states (page 15-60):

> *"Construction of an acoustic shed at the site… represents one possible method for meeting the INP criteria at this site. Construction of a shed across the full extent of the site has implications for cost, visual impact and potentially overshadowing of adjacent residences. … During the*

detailed design stage, alternative noise mitigation options would be investigated for feasibility before determining the final solution to meet the INP noise criteria."

This provides no certainty for residents that the impacts of the stabling facility will be mitigated and what form this mitigation might take. Certainty is critical for surrounding land owners and a core objective of the INP. If INP noise objectives cannot be met then further consultation with impacted neighbours should be carried out in accordance with Chapters 7 and 8 of the INP. The stabling facility site is located in a relatively high density area which will be undergoing even further growth with the implementation of the Randwick UAP. Further, this is not a Staged SSI, therefore no further applications or approvals will be granted. It is critical that mitigation measures are resolved now.

In these circumstances the noise mitigation could be expected to result in flow-on impacts for visual amenity and urban design outcomes. As such, before the Owners could support an acoustic shed Transport for NSW would need to provide a detailed assessment of visual impacts when viewed from 4-12 Doncaster Avenue, including overshadowing, view impacts and urban design outcomes.

2.2 Vibration impacts

The EIS provides an assessment of vibration and ground-borne noise from light rail vehicles in operation along the light rail alignment, but does not provide such an assessment from the stabling yard on Doncaster Avenue residential properties. Transport for NSW should demonstrate that the potential vibration and ground-borne noise impacts from the stabling yard on adjoining residential properties are acceptable.

2.3 Visual impacts and urban design

The EIS and Visual and Landscape Assessment identify visual impacts associated with the Randwick stabling facility, including the potential use of noise attenuating measures along the western boundary. The Landscape Assessment acknowledges that there are a number of private rear gardens at Doncaster Avenue that are located adjacent to the proposal. These properties are private residences and are therefore considered to be of neighbourhood sensitivity.

Visual impacts associated with the proposed stabling facility include:

- Removal of existing substantial trees from the stabling facility land, which can currently be seen from the backyards of 4-12 Doncaster Avenue and provide a picturesque outlook from those properties;
- Outlook from upper levels of Doncaster Avenue properties to an unsightly, industrial stabling yard, including LRVs, catenary structures and overhead wiring;
- A 6 metre noise attenuating wall along the western boundary creating long shadows (if implemented); and
- Glare and light spill impacts associated with night time operations (noting again that the facility will operate on a 24 hour basis).

Figures 3 to 5 are photographs of the existing substantial trees that are proposed to be removed from the stabling facility land. Replacing these trees with an industrial stabling yard is a highly negative outcome for current and future residents of 4-12 Doncaster Avenue. Examples of stabling facilities are provided in Figures 4 and 5. Figure 4, while a train stabling yard, provides an indication of the view that will likely be imposed upon current and future residents. Figure 5, a light rail stabling yard, shows an extensive network of overhead wiring which will be prominent in the view.

Figure 3 – Substantial trees visible from Doncaster Avenue properties

Figure 4 – Sight lines to substantial trees from Gate 19 on Doncaster Avenue

Figure 5 – Row of substantial trees proposed to be removed, viewed from the Racecourse land

Figure 6 – Example of a train stabling facility viewed from above (source: http://railgallery.wongm.com/connex/190_9052.jpg.html)

Figure 7 – Example of a tram stabling facility with overhead wires (source: http://tdu.to/126766.msg)

The Visual and Landscape Assessment concludes that the proposed stabling facility is likely to have a **"high adverse visual impact"** when viewed from Doncaster Avenue looking east. Relevant extracts of the view impact assessment are summarised in **Table 1**.

Table 1 – Impact of stabling facility on 4-12 Doncaster Avenue

Timeframe	Impact assessment	Proposed mitigation
Daytime	Views from the residential properties immediately adjacent to the racecourse on Doncaster Avenue would be impacted. These changes are not visually consistent with the existing character of the surrounding Racecourse landscape and residual area. The stabling facility may be largely screened by the potential acoustic shed or noise attenuation wall (if considered to be the preferred mitigation measure). The removal of trees would however open up views into the site and the access	None

	road and catenary structure and overhead wiring would be prominent in this view, resulting in a considerable adverse change to the amenity of these views. It is expected the proposal will have **high adverse visual impact** during operation. The EIS also identifies that the development of the stabling yard would involve the removal of a number of trees, many of which have been identified as having exceptional and high significance, and which contribute to the character and amenity of the area due to their size and layout. The loss of vegetation is expected to result in the loss of the visual connection to the landscape of the racecourse, and a considerable reduction in the quality of a landscape feature of regional sensitivity. The EIS therefore concludes that there is expected to be a high adverse landscape impact during construction and operation. In addition, a noise attenuating wall along the western boundary will create long shadows, which would block morning sun to rear gardens on Doncaster Avenue. This overshadowing is not likely to directly impact on the living spaces of these homes; however, the reduction in solar access would change the landscape character and landscape function of these back gardens.	
Night time	The stabling yards would create a new source of light at this part of the former racecourse grounds. It would introduce lit LRVs, with moving headlights at regular intervals. These would be similar to the size, breadth and brightness of standard car headlights. The maintenance and stabling facility, which would be predominately used at night, would require brightly lit working areas and security lighting. These elements would be seen in the context of surrounding lit roads and partially screened by the proposed wall and existing vegetation.	Cut off and directed light fittings (or similar techniques) should be used to minimise glare and light spill onto private property. However, it is not clear whether these proposed measures will apply to the stabling facility lighting only, the LRV headlights only, or both.

Despite the conclusion that the stabling facility will have a "high adverse visual impact", no design measures are proposed to mitigate this impact. This is not acceptable considering the close proximity of the stabling facility to residential development, as well as the potential for future development at 4-12 Doncaster Avenue to build to 15 metres (5 storeys) under the preliminary Randwick UAP provisions. Future apartments on the site will have as their prime view an unsightly industrial stabling facility.

It is now standard practice for the private sector to demonstrate design excellence in significant and larger scale developments. A proposal to develop an open and light rail stabling facility immediately adjacent to residential properties with no regard to urban design is inconsistent with this standard practice.

The EIS does not provide any certainty as to the extent of overshadowing impact. Shadow diagrams should be prepared to establish the extent of overshadowing impacts on directly adjoining back gardens.

It is unclear what level of impact the night-time lighting would have on adjoining living areas and bedrooms. Transport for NSW should carry out a light spill assessment to determine what level of lighting is acceptable, especially in relation to second and third storey bedrooms/living spaces which would overlook the possible noise barrier.

Further, it is unclear whether the proposed mitigation measures relating to lighting will apply to the stabling facility lighting only, the LRV headlights only, or both. Transport for NSW needs to ensure that adequate measures are implemented to cover all aspects of the proposed operation.

Transport for NSW should engage architects and urban designers to consider how the design of the stabling facility can achieve a positive urban design outcome. Options that should be considered include (but are not limited to):

- Providing a covered stabling facility, subject to:
  - maintaining adequate levels of solar access to the private open space and living areas at 4-12 Doncaster Avenue. Overshadowing should be modelled throughout the day during mid-winter; and
  - consideration of urban design treatments, which may include (for example) green roofs.
- Providing underground power lines rather than overhead lines.

2.4 Heritage impacts

Neither the EIS nor the Heritage Impact Statement contains any heritage impact assessment of the proposed stabling facility on the heritage items directly adjacent to the stabling facility site at 10-12 Doncaster Avenue. It is standard practice for a consent authority to consider the impacts of a proposed development on adjoining heritage items. The assessment of the proposed stabling facility in section 5.7.3 of the Heritage Impact Statement relates to the Racecourse Heritage Conservation Area (C13) within which 10-12 Doncaster Avenue is located, but there has been no consideration of the heritage item itself. To ensure a comprehensive assessment of the proposed facility is undertaken, the Heritage Impact Assessment should be amended accordingly.

Significant adverse heritage impacts would also result from the demolition of significant elements from the stabling facility land. The Heritage Impact Statement (page 332) states that:

- Removal of the trees along Alison Road and in the north-western area of the racecourse would result in the loss of plantings of "exceptional and high significance" that contribute to the aesthetic and historic significance of the racecourse. This would be a "major adverse impact" on the conservation area;
- The stabling facility would result in the loss of elements that have an "important functional role" in the racecourse since the 1920s; and
- Overall, the proposed CSELR works would have a "major adverse impact" on the heritage significance of the Racecourse precinct heritage conservation area.

The proposal to demolish these elements despite these stark findings demonstrates a disregard for the heritage significance of the Racecourse Heritage Conservation Area within which 4-12 Doncaster Avenue is located. It is inappropriate for a public authority such as Transport for NSW to demonstrate such a disregard for heritage items of important social and historic significance, particularly given the number of negative impacts – aside from heritage – that the stabling facility will have on adjoining residential properties.

2.5 Flooding impacts

The stabling yard site is known to flood and is the location of an existing overland flow path during flood events. In order to protect the stabling facility the EIS indicates that levels at the facility could be raised. However, this would lead to a reduction in the current flowpath as well as loss of significant storage for local or regional flood events. The impact on flood events from filling has not been assessed in the EIS.

Transport for NSW should provide details of the proposed solution to flood protect the stabling facility, and demonstrate that it will not cause exacerbated flood impacts on surrounding properties. At this stage it is not clear whether compliance with the NSW Floodplain Development Manual can be achieved.

2.6 Safety and security

Transport for NSW proposes to include a 4.5 metre buffer between the stabling zone and adjoining residential properties. LRVs will be stabled adjacent to this buffer zone overnight, blocking the buffer zone from view from most of the stabling facility site. Figure 5.52 of the EIS also indicates that the buffer zone would be located to the west of the proposed noise barrier meaning it may not

be visible at any time. This raises obvious safety and security issues for staff of the stabling facility as well as the residents of Doncaster Avenue, particularly at night.

Neither the EIS nor the Social Impact Assessment (**SIA**) assesses the safety and security impacts associated with the buffer zone. The SIA rates the safety and security impacts during stabling facility operations both with and without mitigation measures being put in place (page 109). The rating before mitigation is 'Neutral' and the SIA states:

> *There are no obvious safety and security concerns to the general public from the stabling yard. Increased activity in what is now a quiet residential area may create a sense of unease amongst residents.*

The safety and security rating after mitigation is also 'Neutral', described as follows:

> *Access to the stabling yard to be restricted to authorised personnel. CCTV monitoring to be provided. Adjustment to new surroundings would occur over time.*

In our view the safety and security impact of the buffer zone will be worse than 'neutral'. The design of the stabling facility does not satisfy the Crime Prevention Through Environmental Design (CPTED) principle of natural surveillance in that the buffer zone will be largely screened from view making it easy for this area to be misused and vandalised. This also raises security issues for the Doncaster Avenue residents in terms of unauthorised access to their properties. CCTV monitoring may not be an effective deterrent and is unlikely to give the residents comfort that property and personal safety will be protected.

The SIA states that detailed design will incorporate CPTED principles. However, this is not a Staged SSI application, which means there will be no legislative and formal opportunities for further consultation with the Doncaster Avenue residents. A full CPTED assessment should be undertaken prior to determination of the application and the community should be given an opportunity to comment on it.

2.7 Parking and vehicle access

The EIS contains conflicting information about the proposed number of parking spaces on the stabling facility site and the vehicle entry/exit arrangements.

In relation to vehicle access, the indicative layout of the stabling facility on page 5-70 of the EIS (as reproduced in Figure 2 above) indicates that the two Doncaster Avenue vehicle accesses will both be entry/exit. However, section 15.3.2 of the EIS (page 15-18) and the Traffic Operations Report (section 5.4.5.1) state that the entry and exit points will be separated, with the entry point located opposite Ascot Street and the exit point located close to Alison Road.

In relation to parking, the indicative layout of the stabling facility indicates a car park with 94 spaces, whereas section 15.3.2 of the EIS (page 15-17) and the Traffic Operations Report (section 5.4.5.1) state that 100-120 spaces will be provided.

These two discrepancies should be rectified to ensure that the impacts of the facility are fully understood and to give the community comfort that the application is being rigorously assessed. The vehicle access issue in particular should be resolved as the two scenarios could have different implications for traffic flow, queuing and safety in this location.

3.0 CONCLUSION

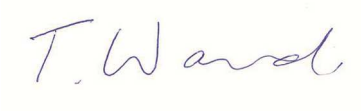
This submission relates to the proposed CSELR Project, in particular the impacts of the proposed Randwick stabling facility adjoining 4-12 Doncaster Avenue, Kensington. The main issues that need to be resolved are urban design, noise, visual and safety/security impacts. The EIS provides no certainty about what (if any) mitigation measures will be implemented to reduce these impacts.

In addition, the EIS should be amended to resolve discrepancies and omissions in relation to parking/traffic and heritage, respectively.

Considering the proximity of the stabling facility to residential properties and the growth that is planned for this area under the Randwick UAP, both the Minister and the community should have certainty as to what the impacts of the proposal will be.

The Owners would welcome the opportunity to discuss the proposal with the NSW Department of Planning and Infrastructure. Should you wish to speak with us or should you have any queries about this matter, please do not hesitate to contact me on 9956-6962 or tward@jbaurban.com.au.

Yours faithfully



Tim Ward
Associate