



16 December 2013

Our ref: DHB/13-212

Director General
Department of Planning and Infrastructure
22 Bridge Street
Sydney NSW 2000

Dear Sir,

re: Submission to Exhibition of the Environmental Impact Statement for CBD and South East Light Rail Project

We write in relation to the exhibited CBD and South East Light Rail Project Environmental Impact Statement (the EIS) on behalf of Colonial First State Global Asset Management, the managers of the Entertainment Quarter at Moore Park (EQ).

EQ contains the former showground and a range of entertainment related uses including sixteen cinemas, shops, eateries and other recreation options such as bowling alleys and laser tag. The

EQ is one of a number of major uses within the Moore Park Precinct with others including:

- Fox Studios, Australia's largest film and television studio and the centre of the Australia's film industry including 14,400 square metres of stages and studios and support facilities such as art and costume departments, workshops offices and supporting businesses;
- Playbill Venue Management operates the Hordern Pavilion and the Royal Hall of Industries catering for a range of events including concerts and family entertainment, exhibitions and trade shows, large gala dinners and events and dance parties
- The Sydney Football Stadium (Allianz Stadium);
- Sydney Cricket Ground (SCG).

Close by are other major attractors and trip generators including Centennial Park, Sydney Boys High School, Moore Park, Parklands Sports Centre, tennis courts and Moore Park Golf Club.

The owners and managers of EQ support the proposed CSELR. However, the following matters should be taken into consideration in the further design of the CSELR.

1. Moore Park Stop

It is understood that three stop designs were investigated for the proposed Moore Park Stop. However, these stop location options were all generally within the same location.

It is submitted that the location of the CSELR stop for the Moore Park Precinct should be located further south than currently proposed to a location adjacent to Macarthur Avenue. This location is seen as having a number of advantages:

- Minimises impacts on the AFL training fields.
- This will improve equity of access between patrons who attend events at the Allianz Stadium and Sydney Cricket Ground venues (referred to in the EIA as more bump in and bump out facilities) and employees who work at the Entertainment Quarter and Fox Studios on a daily basis and visitors to these facilities and the major venues of Hordern Pavilion and Royal Hall of Industries.
- Provides improved access to Sydney Boys High School.
- Provides improved access to the Parkland Sports Centre, Moore Park Golf Club and other recreational opportunities in the Moore Park Precinct;
- Provides improved access to Centennial Park via Lang Road.

It is appreciated that the frequency of service to the Moore Park stop is high associated with 232 trips each way between Circular Quay and Moore Park each day on opening. This is facilitated by the switching tracks immediately to the south of the Moore Park stop enabling return journeys from Moore Park back to the city centre. It is understood that a stop adjacent to Macarthur Avenue provides sufficient space for this track switching arrangements. This is considered a critical feature of the Moore Park stop in that it assists in integrating facilities and services and employment opportunities within the Moore Park Precinct with the CBD.

Therefore, further consultation and evaluation of an alternative stop further south of the current proposed Moore Park site should be undertaken.

2. Design of the Stop

Careful consideration needs to be given to the design of the station. The proposed double-decker station structure has the potential to be an eyesore. Careful consideration needs to be given to the architectural design of any structure to ensure it fits in to the character of the Moore Park landscape.

3. Intersection performance of Anzac Parade/Lang Road

The Traffic Operations Report (Technical Paper 1) states that there will be a small reduction in operational efficiency at the Anzac Parade/Lang Road intersection due to an increased footprint as a result of the CSELR. This is of significant concern as any reduction in operational efficiency will have a detrimental impact on vehicular access to the Entertainment Quarter which is accessed from Lang Road. The EIS notes that the intersection of Anzac Parade and Lang Road has a low level of performance with average delays greater than 70 seconds and poor LoS during both the morning and afternoon peak hours. This poor performance is also experienced at weekends and evenings with special events.

Further investigation into the performance of this intersection is requested to ensure that appropriate action is taken to included works to ensure that there is no reduction in operational efficiency now and in the future as a result of the light rail. These could include intersection modifications, traffic signal changes and traffic management measures. These measures should be investigated and agreed prior to approval being given to the project as they are fundamental to the successful implementation of the project and impact mitigation.

In this regard it is submitted that consideration could also be given to lifting the ban on left turn movement from Errol Flynn Boulevard to Lang Road.

4. Pedestrian Access to Driver Avenue

Currently the quality of lighting and pedestrian amenity and safety from Driver Avenue to the bus stop via Gregory Avenue or Macarthur Avenue is poor and requires upgrading. It is important that the quality of lighting and paving is improved. This will maximise use of the light rail by workers within the precinct, particularly Fox Studios (2,500 workers) and EQ which have a significant permanent workforce 7 days a week.

Full safety audits should be undertaken of the pedestrian connections and appropriate action taken to improve lighting and personal safety along these pedestrian links.

It is also recommended that weather protection be provided between the stop and Driver Avenue.

5. Impacts During Construction

It is understood that the proposed Lang Road crossing would be undertaken over approximately two weeks of night time works which would require closure of the Anzac Parade/Lang Road intersection with traffic directed to the alternate access point of Driver Avenue and Moore Park Road. This is likely to have significant impact on EQ operations unless the road closure for night time work occurs after all venues at EQ have ceased operation. Although this closure is for a 2 week period, this closure has the potential for major impact.

EQ requests that vehicular access to the EQ be maintained at all times during the construction phase of the Lang Road crossing.

It is important that there is on-going discussion and co-operation between the construction company and the precinct occupants. This could include participation in the MEOG (Moore Park Events and Operations Group) as well as regularly communication and liaison with user groups.

The proponent is requested to ensure that all construction sites are maintained in a clean and well-presented manner with control over dust and noise emissions to as to minimise impacts on businesses at EQ.

6. Timing and implementation of Construction Environmental Management Plan

It is understood that the detailed management plans, relating to construction, traffic and the like, will be developed by the contractor. EQ requests the opportunity to be engaged in relation to the detail of the management plans in relation to the Moore Park Precinct.



7. Place Managers

The Social Impact Assessment (Technical Paper 3) recommends the appointment of place managers who would provide a single point of contact for affected businesses and communities along the CSELR corridor would allow for the development of locally appropriate mitigation.

EQ requests a condition requiring the appointment of Place Managers throughout the construction phase as recommended in the Social Impact Assessment accompanying the EIS.

The Minister is requested to give consideration to this submission in determining this application.

We thank you for the opportunity to submit on the exhibition of the EIS and invite you to contact the undersigned on 9211 4099 if any clarification is required.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Dan Brindle', is written over a faint, light blue circular stamp. The signature is fluid and cursive, with a small dot at the end.

Yours faithfully
BBC Consulting Planners

Dan Brindle
Director

Email dan.brindle@bbcplanners.com.au