SUBMISSION TO EIS CBD South East LIGHT RAIL

FROM:

Religious Society of Friends (Quakers), 119-123 Devonshire Street, Surry Hills

16 December 2013

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OVERVIEW

Thank you for the opportunity to comment on the EIS for this project.

We were pleased to be able to benefit from the community process provided by Transport for NSW, and the scheduling of an additional consultation at Surry Hills Library on 2 December. Previously, we responded to the Transport for NSW Business Survey for preparation of this EIS, and relevantly to the City of Sydney's draft Neighbourhood Parking Policy.

We broadly support the CBD & SE Light Rail ('Project') in its objectives particularly in its capacity to serve as a sustainable transport in the CBD and places to the south east – and urge that this transport be part of the **public transport network and affordable**. We have some reservations about the **route selection**; a priority would appear to be a light rail service from Redfern Station to Waterloo, underserved by other public transport, and to Green Square – a major residential development, almost a dormitory suburb for the UNSW & Randwick Hospitals Complex – for which the east-west public transport accessibility is very poor.

For the CBDSELR/Project's proposed **alignment options** (4.3), we much prefer the tunnel option, not the viaduct option and consider this better meets the objective concerning amenity of public space (objective 5).

However, the assessment of noise is incomplete, as recognised by the EIS. We recommend approval only be granted with conditions for proper assessment, verification, options and budget for noise mitigation for consultation with affected premises ('sensitive receptors').

This Submission relates principally to the Quaker Meeting House located in Devonshire Street. The main adverse impact of the Project is noise and vibration. Our submission also comments upon

- Traffic; Travel Demand Management and Parking demand Management
- Light Rail Stop at the hospitals
- Trees
- Jobs.

We have commented on some assessments and proposed mitigation, as well as made some suggestions for improvements. We highlight that the EIS refers to the possibility of further assessment, such as noise in Devonshire Street, and conclude that it would be warranted.

Given the direct impact on Quaker Meeting House and its uses, we welcome an ongoing consultative process during further design, construction, and operation of the new light rail line.

EIS –LOCAL IMPACTS SURRY HILLS PRECINCT: Volume 1A: Section13

Section 13 is a useful summary of the effects and opportunities on this precinct.

This Section (13.2) identifies community concerns for adverse impacts of the proposal, including the noise impacts on Devonshire Street affecting residential properties and other sensitive receivers. The Meeting House is a 'sensitive receiver' owing to its many functions, including residential.

Parking receives a lot of attention; however, we could find no mention of the impact of removing 'disability parking' as a facility of special need.

Traffic hazards ancillary to light rail – Section 13.3's review of traffic hazards did not pick up the existing problems:

- The signalised pedestrian crossing of Chalmers Street is highly congested, and a long-standing hazard for vulnerable pedestrians.

- For cyclist interactions. The EIS did not pick up some significant operational impacts on cyclists (page 13-14 para 2). Motor vehicles turn off Elizabeth Street (and currently from Devonshire St) west down Rutland Street to Chalmers Street. This flow appears to be increasing. This flow creates a difficulty and safety hazard for cyclists trying to cross from the eastern side of Chalmers Street (at Randle Street) to enter the off-road cycleway in Prince Alfred Park. To the immediate north, the western footway is highly congested and cluttered with significant functions: a major bus stop, vehicular exit of RailCorp and Central station Devonshire St exit, a coffee cart and flower sellers. For Chalmers Street, the community has previously recommended that road space be reallocated to the western footway for safety, and better amenity of this public space.

  We would welcome more clarity and a safe, positive proposal for cyclists crossing Chalmers Street to enter/exit this Park.

EIS – NOISE & VIBRATION

Responding to the Director-General's Requirements (DGRs):

On noise and vibration, the Director-General's Requirements include:

- *"a relevant item is, the nature, sensitivity and impact to potentially affected receivers and structures (including heritage items)"* ;
- associated with mitigation measures;
- construction – assessment; impacts to affected receivers & structures; strategy
- Operations – specific consideration of impacts on sensitive receivers ("such as educational facilities and hospitals"; use of PA [bells; on-board announcements]; compliance with guidelines, incl. blasting.

Key questions about noise & vibration exposure and mitigation for the Quaker Meeting House:

Q1. What is the structure and uses of the Meeting House for classifying its status as a sensitive receiver?

Q2. What level of noise and vibration from the light rail will affect the Meeting House (external and internal)?

Q3. what opportunities are available to reduce noise and vibration from current levels, during construction and operation of the light rail including the ancillary changes to motor traffic circulation and pedestrian (event) traffic?

Application to the Quaker Meeting House: "*42 CSLER EIS Technical Paper A – Noise and Vibration Assessment"*

The Quaker Meeting House, 119-123 Devonshire Street, is identified on the map of Land Use and Sensitive Receptors (*EIS Part B, Appendix C Report 610.12515R1 Drawing 4-4*).

Description of existing environment (Technical Paper section 4)

Sensitive Receptors for Noise and Vibration for the Surry Hills precinct (NCA 02.1) includes the Quaker Meeting House under the category 'place of worship' (Table 3).

Like some other Sensitive Receptors, this building has **multiple current uses**: residential, education and 'commercial'/office, as indicated in the response to the 2013 Business Survey (2.5.8) conducted by Transport for NSW earlier in the year. Such uses are relevant for interpreting Tables 7, 8 and 9 on 'airborne light rail noise triggers'. This range of uses - and spread of time of use - are likely to be relevant to possible mitigation and certainly to environmental management.

Significantly, for noise assessment and mitigation, the Quaker Meeting House is a **heritage-listed** building.

The Quaker form of worship is characterised by people gathering together and sitting in silence or stillness, a meditative kind of worship. For this actual use, therefore, the **internal noise goals** would be more appropriate to be at lower levels. A more appropriate level would be equivalent to a classification as a 'drama' theatre as shown in Table 9 (p.32) for recommendations in conformity with the Australian Standard (AS2107)[1].

The Assessment report has noted that to achieve the "recommended 'satisfactory' internal noise levels", by containing the exposure from airborne noise, it has made the assumption that:

> *"These receptors are typically well insulated from external noise break-in. For the purpose of this assessment, an outside-to-inside* ***attenuation of 25 dB has been assumed****."*
> (Note 2 to Table 9, page 32, Technical paper 11: Noise & vibration assessment, EIS Volume 6 Technical Papers)

The Quaker Meeting House, in fact, has traditional doors and windows: openable windows for natural ventilation; windows and doors, particularly the front door facing Devonshire Street are not well sealed. Therefore, this building is vulnerable to transmission of airborne noise into the building. We expect that other buildings, such as Haymarket Library may be in a similar situation: where the assumption is not appropriate.

The Meeting House is closest to BG03 Noise logging location (Figure 2, page 19) where measured noise levels (Table 5), as expected, are midway between CBD and the eastern end of Surry Hills (BG04). Noise monitoring results are described in terms of noise sources but they do not distinguish between types of motor vehicle noise Table 6 (p 27-28).

On Sunday mornings, we notice that that the most intrusive noise is coming from motor traffic accelerating uphill – southbound on Elizabeth Street or eastbound on Devonshire Street. The most acute noise intrusion is from motor cycles, particularly accelerating at speed on either street. Could the Project approval conditions include the management of motorcycle/excessive noise emissions in the Noise Catchment Areas? More broadly, could the government look at ways of reducing the maximum noise permitted from motorcycles to improve amenity and health?

The Technical Paper also reports on ***Operational Noise Modelling, Section 5.4.2 (p.33)*** stating that above 30kph "*noise emissions are dominated by rolling noise from the wheels and rails and rolling noise is proportional to speed."* Although the expected maximum speed of LRV outside Meeting House is about 40kph, the

[1] AS/NZS 2107:2000
Acoustics - Recommended design sound levels and reverberation times for building interiors

predicted noise levels at the Quaker Meeting House exceed the adopted external trigger levels, shown in Table 14 described in 5.5.4 (p.46).

We are concerned that external noise trigger levels have been "adopted" in this EIS having made the assumption that a 25dB attenuation outside-to-inside is applicable to the sensitive receptors, listed in Table 14, without confirmation that that assumption is valid.

Changes in Operational Road Traffic Noise, section 11(p.85 ff) concludes Devonshire Street will experience reduced traffic noise exposure. This conclusion is based on the Applicant's expectations of reduced volumes of traffic along the road (p.85) with the reduction of motor traffic lanes (motor traffic will be restricted to eastbound travel).

However, the Applicant proposes that Devonshire Street be subject to other changes that could increase both the volume and speed of motor traffic:

- closures of connecting streets (e.g. Holt, Clisdell, Waterloo etc)
- consolidation of traffic flows only from Elizabeth and Crown Street

(section 5.4.2.1, p.154 Traffic Operations Assessment (Vol 2 Tech Paper 1)).

No noise assessment of the proposed traffic changes appears to have been made.

Fortunately, the Noise Assessment Section 11.5 offers

> "*If required, the likely changes in existing road traffic noise along Devonshire Street will be determined at a later stage of the project*" (p.89).

We **recommend** that these offers of determining of road traffic noise be made conditions of any approval because of the unknown effect of several changes described above.

We r**ecommend** the Applicant be required to assess noise and report on the actual changes later in the project, to **inform mitigation strategies for operational noise.**

Construction Noise and mitigation (sub-sections 12-14 & Technical Paper 3 section 5.4.2)

Because the EIS has shown noise will be excessive along Devonshire Street, we support compensation for technical treatments to buildings to reduce the penetration of external noise. The Applicant could assist identify and document affected 'sensitive receptors'.

With reference to measures for construction noise mitigation measures (12.6.3), we **recommend** that "additional noise mitigation measures" are relevant to the appropriate noise goals for the Quaker Meeting House, as discussed above.

We **also recommend** that feasible noise mitigation options and measures be **developed in consultation** with the Quaker Meeting House, as a receptor, as raised in section 13.6.4.

Disruption during construction is described in Technical Paper 3 – Social Impact Assessment, 5.4.2 Impact Matrix for Surry Hills precinct.

Under Social sustainability and community function, there is an acknowledgment that

"*community function may be impaired temporarily due to construction*"

and that this may be mitigated by

"Staging of works to minimise disruption, ensuring that community activities and functions can still take place."

We request that there be no construction work on a Sunday morning between 9.30am and 12.30pm – so that our Meetings for Worship, based on silence, will not be disrupted.

During the years ahead, we anticipate periods when disruption by construction, whether noise and/or physical disruption, would grossly interfere with access to activities held at the Quaker Meeting House. For example in 2014, as part of NSW History Week 6-14 September, we plan to stage a series of events.

Comment on Summary of Impacts and Mitigation (sub-section 16)
Applying this Summary to the Quaker Meeting House, we draw attention to:

- noise trigger levels are exceeded for the sensitive receptor of the Quaker Meeting House; noise levels require further investigation to include road traffic noise for all the ancillary changes proposed: single lane running; intersection closures and consolidation
- noise impacts of special events (before & after) are likely to include pedestrians on Devonshire Street to the showground and may themselves be a noisy crowd; it may be beneficial to retain Foveaux Street as the nominated walking route (currently sign posted by the RTA)
- the proposal to verify predicted noise and vibration levels in this assessment, overcome the current omissions, and investigate and consult on mitigation measures during the design phase has our support
- the availability of measures that can be used to attenuate ground-borne operational noise (16.2), and we recommend that investigation of these measures by applied to Devonshire Street

- Our request to be kept informed and consulted on feasible and reasonable noise mitigation measures; and request some consultation during the preparation of the proposed "Construction Noise and Vibration Management Plan" (16.6) as well as disruption to access to Devonshire Street.

TRAFFIC MANAGEMENT AND ACCESS

The Main Volume Chapter lists principles one of which concerns signalised crossings (5.4.11 p. 5-84).

We suggest consideration of cost-effective bicycle signage for shared crossings (as recommended by BikeEast) in place of expensive bicycle lanterns – to be trialled here, or installed here, if not already in use elsewhere in Sydney metropolitan area.

Technical Paper 1, Part B lists 'functional changes' to accommodate light rail on Devonshire Street but it doesn't mention the upgrading of signalling at the intersection of Devonshire and Elizabeth Street, nor mention permitting bicycle crossing together with pedestrian crossings (page 154). An upgrade is desirable because currently the signalised intersection of Devonshire and Elizabeth Street is only on the northern and western sides.

We also note the risk of not fully integrating cycling into the proposal. For example, the Surry Hills stop (Figure 5.23) presents a profile of the space and users, with the omission of people riding or walking with bicycles. We note that this stop is at the Devonshire junction with Riley Street which is a recognised on-road cycleway, and very close to Bourke Street's separated cycleway.

Pedestrian lights and phasing times to be more pedestrian/bicycle-friendly

For pedestrian/bicycle crossings of Elizabeth Street at Devonshire Street, we consider the CSLER project should be given a commitment from RMS for:

- good service levels to trams by a combination of short signal phasing, shorter than current phasing, down from 100/90 to 60'
- better service levels for pedestrians and bicycle crossing than currently provided.

While the problem of removing on-street parking space has gained a lot of attention, the EIS has given little attention to reducing parking demand or to how to achieve Travel Demand Management (reduced mode share by private car) in the catchments of the CSLER. Practical strategies for reducing parking demand could give priority to disability parking, as well as parking space for car share vehicles

and space for taxi pick-up, drop-off and visiting tradespeople. A potential strategy would be to facilitate membership of car sharing organisations among people working and living in areas where on-street car parking space is to be reduced.

Management of Parking

Chapter 13.3.2 Impacts during Operation discusses the significant “loss of parking" on Devonshire Street and other streets, including the “loss” of 5 disability parking spaces. Two of the disability parking spaces are located in Devonshire Street close to the Quaker Meeting House.

From a sustainable transport perspective, we suggest recognising the merit of progressively reallocating road space from car parking (storage) to other more vital uses, such as better facilities for walking, cycling and using public transport, and street gardens and appealing public spaces.

Chapter 6.10.10 On-street parking suggests that

“Parking capacity would be managed through:

- *Extension of parking permit schemes, particularly in predominately residential precincts surrounding the project corridor (These would be designed to afford priority to local residents to park in the vicinity of their home with an allowance for short-term parking for visitors and for vehicle access to commercial land uses and other short stay trip generators.)*
- *Providing priority on streets immediately adjacent to the CSELR corridor where commercial land uses are present for loading and short-term parking.”*

We **recommend t**hat these arrangements for parking will include:

1. provision for disability parking
2. eligibility for short-term visitor parking permits to be open to both current holders of resident parking permits and persons eligible, but not holders of permits on account of being ‘car-free’.

Local Traffic

‘13.3.2 Impacts during Operation’ mentions that:

“The closure treatments [of side streets running into Devonshire Street] have been designed to include appropriate turnaround facilities or service road access to adjacent streets.”

As more traffic will likely use these side streets to access properties such as the Quaker Meeting House, we indeed hope that these turnaround facilities will be adequate.

Taxis

Chapter 13.3.3 Impacts during Construction and mentions the loss of taxi zones along Devonshire Street and indicates that taxis will be consolidated into one location adjacent to Central Railway Station in Chalmers Street, south of Devonshire Street. However we are concerned about the future difficulties with respect to taxi pick-up or drop-off of visitors to the Quaker Meeting House, especially visitors with luggage (commonplace) or shopping. With the loss of parking in Devonshire Street, the closure of Holt Street between Gladstone Street and Devonshire Street, and limited ability for pick-up and drop-off on Elizabeth Street, we fear that visitors (who sometimes have mobility issues and/or heavy bags) will be forced to walk some distance to/from the Meeting House (and uphill from Chalmers Street)

Parking Demand Management and Travel Demand Management

Both types of management deserve support by the Applicant. The use of 'active travel' (walking, cycling and in combination with public transport) can be effectively promoted by trip generators. Trip generators, in association with transport providers, can use Transport Access Guides and aim to reduce car use. Transport for NSW in cooperation with the City of Sydney could promote the use of car sharing by residents and businesses. And in areas of greatest "loss" of car parking residents and businesses could be offered a transitional subsidy to join a car sharing club on surrender of a parking permit.

Jobs

Provision would need to be made to assist the employment transition of staff affected by the partial replacement of bus services by the light rail (NB contemporary publicised concerns about ticketing staff and the introduction of Opal).

Trees

Chapter 13.6.2 discusses the necessity to remove trees because of encroachment into the tree protection zone, encroachment into the structural root zone or due to tree canopy height.

About 7-8 years ago some of the old Cottonwood trees were removed in the Devonshire Street block between Elizabeth Street and Clisdell Street and replaced with Liriodendron tulipifera.

We are unclear about whether the relatively young trees on the south side of Devonshire Street, including the one outside the Quaker Meeting House, will need to be removed. If so, we certainly hope that they will be replaced and note the proposal in 13.6.3 Mitigation measures to replace trees at a ratio of between 2:1

and 8:1. We would like Devonshire Street to continue to have a green aspect, preferably with native plants (as habitat).

Trees also have broader benefits for sustainability in terms of the volume of biomass and reducing the heat caused by the heat island effect.

Stop at UNSW and Randwick Hospitals Complex

We suggest that a stop located on High Street, near the intersection with Botany Street, could serve the top campus and be within a short walk of the hospitals' entrances on High Street. We also note that some express bus services to UNSW travel from Anzac Parade up High Street with 2 stops (Gate 2 and Gate 8) before reaching the Botany Road intersection – a distance of just over 1km. These stops provide access to residential accommodation and to dense buildings on the campus, including an outpatient optometry clinic that serves some people who are visually impaired. It may be desirable to retain some express bus services to UNSW particularly during peaks because it offers a service that may be more physically accessible and faster than planned for light rail.

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