



NRMA Motoring & Services

Sydney CBD and South East Light Rail

SUBMISSION TO THE ENVIRONMENTAL IMPACT STATEMENT

December 2013

About NRMA Motoring & Services

NRMA Motoring and Services (NRMA) comprises almost 2.4 million members in NSW and the ACT. For more than 90 years, NRMA has represented the interests of its Members in relation to traffic congestion, road safety and other relevant public policy issues.

NRMA began in 1920 when there were 20,000 motor vehicles on the road. One of the first services NRMA offered was car minding in the centre of Sydney in 1924, when it was against the law to leave a motor vehicle unattended.

Today NRMA has grown and in addition to providing roadside assistance, it has diversified to offer a range of motoring, travel, lifestyle and advocacy services. However NRMA remains a Membership organisation with its key focus being on Member benefits.

NRMA's Members use all our transport networks including roads, public transport and walking and cycling networks and that's why we fight for both better roads and better public transport facilities. Our advocacy for improved public transport was recently highlighted through our Seeing Red on Rail campaign which attracted over 11,000 respondents.

Comments and Queries

Comments and queries on this document may be directed to:
Government Relations & Public Policy
NRMA Motoring & Services
PO Box 1026, Strathfield NSW 2135
T: +612 8741 6000
E: Public.Policy@mynrma.com.au

Contents

- About NRMA Motoring & Services-----2
- Comments and Queries -----2
- Contents -----3
- NRMA Submission -----4
 - Sydney CBD -----4
 - South East-----5
 - Alignment Options -----6
 - Road configuration changes -----7
 - Parking -----7
- Attachments-----9

NRMA Submission

NRMA welcomes the opportunity to provide comment on the Environmental Impact Statement (EIS) for the CBD and South East Light Rail (CSELR) project.

The CSELR project will involve a number of major changes to the city's road network and it is expected the expansion of light rail will come at a cost to motorists.

While the proportion of all journeys to the Sydney CBD taken by car is set to remain static over the long term, growth in the overall transport task means that there will inevitably be more cars travelling into the CBD than current levels. The removal of road space and introduction of light rail will adversely impact road congestion and the experience of motorists in the City.

It remains unclear how the CBD road network will be reconfigured to accommodate light rail, in particular how displaced traffic will be absorbed after the partial closure of George Street to general traffic. With light rail services running at two minute frequencies in each direction, traffic flow on priority east/west corridors will inevitably be affected.

The removal of on-street parking along the CSELR corridor will also impact negatively on residents, workers and visitors to the City and South Eastern suburbs. The EIS details the amount and type of parking spaces that will be lost, however the likely negative impact on parking supply in adjacent areas is not discussed.

The introduction of several at-grade crossings to the road network is a further concern and is likely to result in traffic delays beyond the area directly adjacent to the project corridor.

Many of the issues raised in this submission are also detailed in NRMA's recent submission to the Sydney City Centre Access Strategy. This document is attached.

Sydney CBD

1. Displaced traffic

It is important to note that although the proportion of peak private vehicle trips to the city is set to remain relatively static in the long term, growth in overall transport demand means that there will be more, not less cars travelling to the CBD in the future.

Our primary concern with both the EIS and Sydney City Centre Access Strategy is that there remains little detail on how the proposed changes will impact on private and commercial motorists, or details of how these impacts will be managed.

The EIS deals with intersections along the proposed project corridor, however we believe the flow on impacts in surrounding streets will be considerable. We expect there will be many people right across Sydney who will be unaware of the full extent of the TfNSW proposals to significantly reduce the number of traffic lanes, and increase the number of turn bans at intersections.

We strongly recommend that TfNSW publish for public consultation an easy to read diagram showing **both the existing and proposed changes** for all intersections and mid-block locations where changes are proposed. The diagrams should highlight any changes in both the number and types of lanes, and also any changes to turn restrictions.

2. Relative travel times

NRMA believes more clarity is needed on estimated trip times for light rail and buses, given that bus services will be moved to already congested Elizabeth Street and are likely to slow significantly as they travel north from Central Station.

Based on current information, the nominal trip time on CSELR between Central and Circular Quay of 15 minutes is likely to deter commuters travelling from the South East to the CBD's north from choosing light rail, when compared to the relative trip times on buses. For example, in around 16 minutes, a Randwick commuter can take a peak express bus from Belmore Road to Circular Quay.

It is assumed that a significant number of commuters will interchange to heavy rail services to reach Wynyard, Barangaroo, Circular Quay and St James, as this provides the fastest travel time – approximately 8-9 minutes between Central and Circular Quay. However, interchange journeys (forced or otherwise encouraged) typically will deter a proportion of commuters from travelling by public transport in the first place.

Uncompetitive travel times for many commuters on CSELR may be counterproductive in achieving the assumed mode shift to light rail outlined in the EIS.

South East

1. Randwick LGA accessibility

The Randwick LGA (which encompasses the entire south east section of CSELR) currently has a high level of car use, considering its proximity to the high density Sydney CBD. On average, households own 1.3 cars and 60 per cent of daily journeys are made as a vehicle driver or passenger.¹

Major employment destinations are the Randwick Health precinct and the University of NSW (UNSW). While CSELR is likely to significantly increase public transport trips to UNSW, many hospital workers, patients and visitors will still require private vehicle access and parking.

Through the removal of parking and restriction of east-west movement and right-turns along the project corridor, NRMA believes the CSELR will adversely impact all motorists who live, work and visit the Randwick LGA.

2. Accessing the CBD

Approximately 30 per cent of commuters from the Randwick LGA work in “Global Sydney” requiring them to travel to or via the CBD in the morning and afternoon peak.²

These workers currently commute predominantly by bus, and there are concerns that CSELR will not offer travel times that are competitive with current express and limited stops buses servicing areas such as Coogee (approximately 37 minutes) and Maroubra (35 to 42 minutes). A bus/light rail journey for these commuters will make their journey around 44 minutes and 49 minutes respectively, without an implied interchange time penalty of up to 2 minutes.

NRMA believes that expectations for these commuters to interchange to light rail from a bus are overstated.

¹ NSW Bureau of Transport Statistics: 2011-12 Household Travel Survey

² NSW Bureau of Transport Statistics: 2011 Journey to Work Data

Alignment Options

The CSELR corridor will require a significant reallocation of road space, with kerb-side parking and traffic lanes being reduced. NRMA supports corridor options that minimise the impact of the project on motorists.

1. Wansey Road

Noting the additional acquisition costs involved, NRMA supports alignment Option 4 for Wansey Road, which uses the adjacent land owned by Randwick Racecourse. Option 4 is the most preferable in terms of retaining local and regional traffic functionality, accessibility and on-street parking.

The preferred Option 1 involves the removal of all on-street parking, which will negatively impact on local residents, workers and visitors to the nearby Prince of Wales Hospital and UNSW.

2. Moore Park precinct

NRMA supports the tunnel option through Moore Park, noting that this will minimise the impact on traffic travelling along Anzac Parade, and preserve the existing amenity of the public parkland.

3. Light rail & bus operations within Moore Park and Centennial Park

The section of the proposed route between the Moore Park stop and Doncaster Avenue, where the alignment runs within Moore Park and Centennial Park, is unique in that the light rail would be segregated from the public road network (with the exception of where it crosses Lang Road).

NRMA supports the preferred option between the Moore Park stop and Robertson Road for a dedicated light rail track running adjacent to the busway on the eastern side (Option 2). This option is more preferable from driver's perspective compared to Option 3 as Option 2 would avoid increased traffic congestion on Alison Road resulting from displaced buses.

4. South Dowling Street crossing

The at-grade crossing of South Dowling Street will exacerbate current levels of traffic congestion. NRMA believes the impact on through traffic of seven seconds provided in the EIS may not take into account the cumulative impact of traffic slowing to stop at the signalised level crossing.

Given light rail will be operating at up to two minute frequencies, we believe traffic queues on both sides of South Dowling Street are likely to slow traffic significantly, which will have flow on impacts to the nearby major choke points at the Cleveland Street intersection, and further South at the Lachlan Street/Dacey Avenue intersection.

The problems associated with at-grade crossings on major arterial roads are well known. NRMA questions the wisdom of reintroducing level crossings to Sydney's road network given past experience and the inefficiency of existing heavy rail level crossings across the state, and would support further examination of grade separation at South Dowling Street to maximise the efficiency of both the light rail and road networks.

5. Kingsford interchange alignment

NRMA supports Option 1 for the Kingsford stop location, as it provides optimal design for bus-light rail interchange and minimal conflict points between private and public transport vehicles.

There is much emphasis on buses from the south and south east interchanging with the

light rail at this terminus. However, it is unclear how the terminating buses would turn around. This is important, given the proposed conversion of the nine ways roundabout to a signalised intersection.

The redesign of the nine ways intersection is likely to have a significant impact on traffic flow in all directions around the precinct, including the major corridors of Bunnerong Road and Gardeners Road. NRMA believes more clarity is required on how this complex traffic junction will be reconfigured to accommodate the light rail and bus interchange with minimal impact on motorists.

As with South Dowling Street, NRMA encourages the government to examine options to grade separate this intersection to segregate private and public transport and minimise congestion at and around the Nine Ways.

Road configuration changes

The light rail project will require a number of significant changes to the operation of the existing road network.

These are detailed for the intersections along the proposed project corridor, however NRMA is concerned by the lack of detail provided on the likely impact on surrounding streets and intersections of displaced traffic and increased competition for on-street parking.

In the CBD, there remains no substantial information on the volume of traffic that will be displaced from the closure of George Street between Town Hall and Hunter Street and onto the priority traffic corridors.

NRMA has reservations around the future operation of critical east/west links such as Hunter, Margaret and Bridge Streets where LRVs will receive higher signal priority than general traffic. The proposed removal of lanes from these streets is likely to further exacerbate congestion.

NRMA's concerns relating to the future configuration and operation of the Sydney CBD road network are detailed in its submission to the Sydney City Centre Access Strategy.

Parking

The majority of on-street parking will be removed to accommodate the dedicated light rail corridor. While this may mitigate some of the negative impacts on traffic, it will have a flow-on impact on parking availability and traffic volumes in surrounding neighbourhoods.

1. Loss of on-street parking

CSELR will remove approximately 900 parking spaces from streets along the project corridor in the CBD, Surry Hills, Randwick, Kensington and Kingsford. The EIS indicates that parking occupancy in the inter-peak and post-peak periods for most corridor precincts is at least 75 per cent, and often above 90 per cent. The removal of these parking spaces will increase competition for parking on adjacent streets.

NRMA questions the need to retain bus lanes parallel to the light rail corridor and in areas such as Surry Hills, where demand for on-street parking will be further constrained by CSELR. Options to reduce bus priority and preserve some on road parking on Anzac Parade at Kensington and Kingsford should also be considered.

2. Park and Ride

NRMA encourages the government to consider working with the private sector to

establish park and ride facilities in areas where adjacent land can be utilised to encourage more car/light rail interchange journeys.

The EIS states that the intent of the CSLER is to “contribute to the delivery of a high quality public transport system, with good local pedestrian access”, and so it is not anticipated that there would be a significant need to provide private vehicle access at stops. NRMA disagrees with this assessment, and believes private vehicle access will play an important role in patronising light rail services, particularly in the off peak and on weekends.

NRMA believes there is an opportunity for park and ride journeys in the inter-peak and off-peak. The proximity of the Moore Park Entertainment Quarter to the Eastern Distributor would make it an ideal location for visitors to Sydney to park their car and access attractions in the CBD by light rail. Similarly, Randwick Racecourse and South Sydney Juniors should be considered as sites to establish park and ride facilities.

Attachments

1. NRMA Submission to the Sydney City Centre Access Strategy