

CBD and South East Light Rail Project

Submission on Environmental Impact Statement - November 2013

The NSW Small Business Commissioner acknowledges that the CBD and South East Light Rail (CSELR) Project is integral to securing the future of Sydney as a global city and that the communities and businesses located within the precincts along the CSELR route will derive significant long term benefits from the project.

Whilst the end result will bring a range of benefits to small businesses along the CSELR route and surrounding precincts there will undoubtedly be significant disruptions experienced by these businesses during the construction phase.

From a small business perspective the success of the project will be contingent upon the following:

- Simple, consistent and personalised communication to small businesses about the project and it's progress;
- A single 24 hour channel through which small businesses can seek information, ask questions and raise issues;
- The ongoing identification of potential risks, clear communication about possible impacts from these risks and timely development and implementation of solutions to mitigate these.

Of businesses surveyed about the CSELR Project, I note that 38% indicated they were "undecided/unsure" about whether or not they supported the project. This is a substantial proportion of businesses who potentially will be affected by the project and I would therefore strongly recommend that further consultation be undertaken prior to the construction phase to engage with these businesses and to provide information which:

- Gives them a clearer understanding of how the longer term gains will potentially offset the relatively short term costs;
- Empowers them to make informed decisions which will prepare them for the challenges their businesses will face during the construction phase;
- Provides them with a clearer understanding of the mitigation strategies which will be put in place to offset the potential risks which may be experienced by small businesses during the construction phase;
- Clearly articulates the nature and frequency of communication they can expect during the construction phase and the types of assistance that will be made available to support them through this phase; and
- Links them to government and non-government services within the broader community to whom they can go for general business advice and support including the Small Biz Connect program which is run by the Office of the NSW Small Business Commissioner (OSBC).

I would strongly recommend that Transport for NSW consult regularly with the OSBC during the project and leverage off the Small Biz Connect program so that proactive engagement with small businesses can take place which will assist them in positioning themselves to take advantage of the potential business opportunities that will result during both the construction and operation phase of the project.

Below are comments from the NSW Small Business Commissioner (OSBC) in relation to the CSELR - Environmental Impact Statement (EIS) documents circulated in November 2013:

Key Issue	Key potential impacts	Recommendations
Traffic and access		
<i>During Construction</i>		
Parking Network changes Pedestrians & cyclists Special event access	<ul style="list-style-type: none"> It is essential that there is early identification of changes to on-street parking and loading zones along the alignment to ensure that there is sufficient consultation with local businesses prior to commencement of the construction. I agree that parking for the construction workforce should not be provided on nearby streets as this would further exacerbate the impact upon local businesses. I have concerns that loading zones which are designed to service local businesses will become all day parking spots for construction workers given that anyone with a station wagon or four-wheel drive vehicle can park in these spots. I support the intention to use dedicated shuttle bus services from the main construction sites as this would provide an incentive for workers not to use their private vehicles and thus minimise the dependency on local parking spaces and loading zones located near businesses. Whilst I understand there are times when pedestrians, buses and private vehicles will be diverted to accommodate the safe construction of CSELR it is essential that such diversions are communicated in a clear and timely manner so that local businesses can prepare for these disruptions in trade and can identify possible business strategies to mitigate against potential losses. 	<ul style="list-style-type: none"> That small businesses are consulted in relation to potential changes to on-street parking and loading zones well in advance of the construction phase commencing and that they are made aware of any alternative arrangements that are to be put in place. That small businesses are given adequate notice of changes in pedestrian, bus and private vehicle access and when diversions are put in place so that those businesses which rely on passing trade such as retail and hospitality businesses can be prepared for potential loss of trade and can develop strategies to mitigate against such loss. That consultation with small businesses should include a range of channels including visits to business premises, flyers, newspaper notices and online. From the OSBC's experience small business owners access information in a range of formats and there is no one channel through which to reach all small businesses. That engagement with OSBC take place well in advance of the construction phase so that the Office is aware of the issues and proposed solutions and can assist in readying small businesses for the potential interruptions and provide them with timely information. That engagement with the Police and other emergency services takes place in advance of the construction phase, as from our experience it is often these services that are approached by businesses and residents for information when there are disruptions to normal daily activities. By keeping these services informed they can

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		<p>become an important local resource and assist in allaying people's fears and uncertainty.</p> <ul style="list-style-type: none"> • That Transport for NSW ensure small businesses are consulted with, and involved in, the development of the Construction Environmental Management Plans (CEMP), Access Management Plans and Business Landowner and Engagement Management Plans so that their concerns are considered and strategies developed to address these. By involving small businesses in the development of solutions/strategies they will feel greater ownership of these and greater commitment to ensuring they work. • That Transport for NSW ensures the Construction Environmental Management Plans (CEMP) Access Management Plans and Business Landowner and Engagement Management Plans are: <ul style="list-style-type: none"> - Simple and easy to implement; - Small business friendly; - Flexible and responsive; and, - Include a simple and timely complaint management mechanism. • That Transport for NSW liaise with OSBC prior to the construction phase to determine if OSBC can make available a Small Biz Bus to be parked at identified locations when there is significant disruption to the local business community. The Bus provides high-quality mobile business assistance and where appropriate will link businesses in to their local Small Biz Connect provider for more ongoing business support.
<i>During Operation</i>		
Parking	<ul style="list-style-type: none"> • Small businesses will be impacted upon by the removal of some on-street parking to 	<ul style="list-style-type: none"> • That Transport for NSW clarify where funding for alternative parking arrangements will be sourced and if

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<p>Network changes</p> <p>Pedestrians & cyclists</p> <p>Special event access</p>	<p>accommodate the dedicated light rail corridor and assist traffic flow.</p> <ul style="list-style-type: none"> • I note that Transport NSW and local councils will work closely together to manage local parking impacts, however I note that inconsistencies may exist in the quality and extent of strategies developed across local government boundaries depending on the willingness, priorities and available resources of the relevant local council. • It is important to note that even the most simple of parking strategies such as providing short term parking or loading zones on adjacent streets or extending parking permit schemes requires funding and resources. And often responsibility falls on local councils to enact these changes and they may not see these as priorities even though the impact upon local businesses can be significant. • I strongly support managing parking capacity with strategies that assist local businesses such as extending parking permit schemes to cater for short-term commercial parking and access requirements and providing short-term parking and loading zones on adjacent streets to the alignment and local businesses. This would enable access for deliveries and minimise the need for businesses to utilise metered and timed parking spaces and/or hiring nearby parking spaces. 	<p>local councils will be required to contribute funding to these projects.</p> <ul style="list-style-type: none"> • That consultation with the relevant local councils and businesses be undertaken well in advance of the construction phase commencing so that there is time to work through the issues and develop parking strategies appropriate to each local council area. • That Transport for NSW liaise with NSW Roads & Maritime Services who are currently working with local councils on developing parking strategies as part of the <i>Sydney Clearways Strategy</i>. The development and implementation of a single model for assessing and funding alternative parking strategies across NSW Government would create consistency and clarity for local councils given some may have involvement in both projects. In addition, a single model could have applicability for both current and future infrastructure projects across the state. • That Transport for NSW adopt strategies for managing parking capacity which accommodate the needs of small businesses within a local precinct and which enable business owners and their customers to have a range of free and/or low cost parking options.

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Noise and vibration		
<i>During Construction</i>		
Noise and vibration	<ul style="list-style-type: none"> It is essential that there is early identification of potential disturbances caused by noise and vibration to ensure that there is sufficient consultation with local businesses prior to commencement of the construction. 	<ul style="list-style-type: none"> That small businesses are consulted in relation to potential disturbances caused by noise and vibration and are given accurate timeframes for the length of the disturbance so that they can try to mitigate the impact where possible. That consultation with small businesses should include a range of channels including visits to business premises, flyers, newspaper notices and online. From the OSBC's experience small business owners access information in a range of formats and there is no one channel through which to reach all small businesses. That engagement with OSBC take place well in advance of the construction phase so that the Office is aware of the issues that may arise for businesses and can assist in readying them for the potential interruptions and provide them with timely information. That Transport for NSW ensures small businesses are consulted with, and involved in, the development of the Construction Environmental Management Plans (CEMP) which will include a Noise and Vibration Management Plan so that their concerns are considered and strategies developed to address these. By involving small businesses in the development of solutions/strategies they will feel greater ownership of these and greater commitment to ensuring they work.

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Planted trees and landscape		
<i>During Operation</i>		
Visual and public domain benefits	<ul style="list-style-type: none"> I note that Transport for NSW will prepare detailed urban design strategies and plans for improvements to the public domain spaces created as part of the CSELR and recommend these are developed in consultation with local communities, businesses and councils. 	<ul style="list-style-type: none"> That Transport for NSW consult with local communities, businesses and local councils as part of the process for developing urban design strategies and plans for improvements to public domain spaces. The input of local businesses, communities and councils is integral to this process and will ensure that each precinct maintains its local identity and character.
Socio-economic		
<i>During Construction</i>		
<p>Local socio-economic impacts</p> <p>Local economic impacts</p>	<ul style="list-style-type: none"> The Stakeholder Managers within Transport for NSW need to actively identify those businesses which are already economically vulnerable and refer them to services where they can get business support and assistance prior to the construction phase. Once construction begins it will become even more difficult for these businesses to survive given the level of disruption their business may experience. These businesses will need to begin identifying how they can put in place strategies to mitigate the potential risks to their business during the construction phase. Given the CSELR route will impact significantly on major and local retail strips within Sydney, it is important to acknowledge that this project comes at a time when the Australian retail sector is 	<ul style="list-style-type: none"> That Stakeholder Managers within Transport for NSW within each precinct play an active role in identifying those businesses which are financially vulnerable and refer them to services providing business support and assistance such as the Small Biz Connect program run through the OSBC. That Stakeholder Managers within Transport for NSW, where appropriate, refer retail businesses to the Small Biz Connect program offered through the OSBC. The Small Biz Connect advisors across NSW have completed specialist retail skills training in partnership with the Australian Retailers Association (ARA). As part of this initiative, the ARA Retail Institute is conducting skills workshops for retailers throughout NSW. Once retailers have completed the workshop they will receive tailored business support and ongoing mentoring from our Small Biz Connect advisers. Finally, a retail specific diagnostic

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	<p>experiencing significant structural adjustment, including the growth of online retail, the historically high valued Australian dollar, the entry of international fashion labels into the local market, smartphone and tablet technologies and the emergence of the services industry as a major retail tenant. These changing dynamics within the retail sector in combination with the potential impacts from the CSELR will place significant pressures on businesses within the retail sector.</p> <ul style="list-style-type: none"> • It is important to clearly convey to businesses that by being responsive and adapting their offering during the construction phase they will hopefully be able to successfully mitigate the potential risks to their business. 	<p>tool has been developed in partnership with the ARA which will enable Small Biz Connect advisors to provide retail businesses with practical guidance and support. These programs would be of particular benefit to those retailers experience significant disruptions to their business as a result of the CSELR and who wish to identify tailored ways in which to mitigate the risks and take advantage of potential opportunities.</p> <ul style="list-style-type: none"> • That Transport for NSW consult with local businesses as early as possible to provide information about how changes to pedestrian flow and transport routes might impact upon their business including the estimated number of workers that might be accessing local businesses, how changes to traffic routes might increase or decrease traffic flows in particular precincts at various times, and what will be peak trading times and periods based upon the movements of the construction workforce. This will equip businesses with information to assist them in adapting their offering and hours to suit a new customer base. • That Stakeholder Managers within Transport for NSW, where appropriate, refer local businesses to business advisory and support programs, such as the Small Biz Connect program offered through the OSBC and business precinct services within local councils so that they can access information and advice to assist them in positioning themselves to take advantage of potential opportunities that may result from the CSELR, such as greater pedestrian traffic due to the construction workforce.

Key Issue	Key potential impacts	Recommendations
<i>During Operation</i>		
<p>Social benefits and impacts</p> <p>Local economic benefits</p> <p>Local economic impacts</p>	<ul style="list-style-type: none"> In order for small businesses to make the most of the improved social and economic environment that will potentially result from the CSELR, it is important that they start readying themselves in advance of the completion date for these changes, including improved access and greater pedestrian numbers. 	<ul style="list-style-type: none"> That Stakeholder Managers within Transport for NSW, where appropriate, refer local businesses to business advisory and support programs, such as the Small Biz Connect program offered through the OSBC so that they can access information and advice to assist them in positioning themselves in advance of the completion date to take advantage of improved business conditions.