

CSELR EIS SUBMISSION
Department of Planning and Infrastructure
Sydney NSW 2000

38/30 Nobbs Street
Surry Hills
NSW 2010

24 December 2013

Dear Sir/ Madam,

Re: CSELR – Response to Environmental Impact Statement

I do not agree with the proposed design of the CBD and South East Light Rail project (CSELR) as described in the Environmental Impact Statement (EIS) dated November 2013.

My concerns in relation to the CSELR project and the EIS, with particular interest with significant impacts caused by the proposed Surry Hills to Moore Park West route via Devonshire Street include:

1. Business Case – lack of transparency of information and data to support proposed CSELR
2. Poor Community Consultation
3. Light Rail Vehicles (LRV's) - size, noise impacts
4. Impact of Construction During /Post Project
5. Negative Impact on Surrounds – Land Use, Parklands and Visual Impact
6. Risk to Community Safety
7. Impact on Parking and Creation of Traffic Congestion
8. Compensation for Residents Impacted

1. BUSINESS CASE - LACK OF TRANSPARENCY OF INFORMATION AND DATA TO SUPPORT THE PROPOSED CSELR

The Government has failed to provide to the public a detailed business case for the project (although promised).

Freedom of Information requests for background modelling and the final business case including cost benefit analyses of light rail (vs. other forms of transport) and for various other routes have been ignored.

The CSELR EIS is based on a route via Devonshire Street. Business rationale with supporting modelling data for excluding other route options has not been made available.

As a taxpayer I also want to understand

- Why is Light Rail the most cost effective way of servicing existing and future commuters in the south east
- And most importantly, why has Devonshire Street chosen as the Government's preferred route over other alternatives.

I would also refer you to the CSELR EIS submission by transport specialist Mr Peter Egan. He has extensively modelled the passenger capacity of the proposed CSELR and estimates that the capacity is under 4,000 per hour in either direction.

The Government proposed Surry Hills route involves the demolition of 69 homes and negative impact on the area including significant increase in noise, financial impact on small businesses and on parklands and trees.

A local Engineer has identified an alternative cut and cover proposal along Fitzroy/Foveaux Streets. The Foveaux route delivers greater capacity (through a third line), avoids traffic issues with major intersections, has less residential impact, increased speed for LRV's that will decrease travel times, less visual impact on the local area and no long term noise impact for residents. It also provides for a station in the centre of Surry Hills, and within the area where many buses will be cancelled, rather than one that is a 5-minute walk from Central station (Ward Park).

I understand the Government has made different unsubstantiated public statements for rejecting the Foveaux sub-surface; in some cases technical, in others it is about it resulting in "substantially greater construction impacts on local communities and businesses". At a TfNSW Information session, I was advised the issues were cost as well as greater construction impacts (and impediments).

There are 1,000 online signatures supporting the Foveaux sub-surface route (and 4,000 written supporting an alternative to Devonshire Street).

I hereby request:

1. All business case studies for transport solutions for the South East Sydney to be made public
2. Cost benefit of all possible routes (surface, sub-surface and tunnels) as well as alternatives including bus rapid transit be made public
3. TfNSW to publicly respond to the capacity issues raised in Mr Peter Egan's EIS submission.
4. An independent timetabling expert review existing and projected demand (including special events) and submit a timetable that would be suitable for use. This expert will incorporate different phasings of traffic lights along the route to accommodate traffic and pedestrian movements. I request this document be made available to the public.
5. The subsurface routes (Foveaux or Devonshire) should be the default option for light rail transit through Surry Hills

2. POOR COMMUNITY CONSULTATION

The community have not been seen as stakeholders in relation to this project. This has not been true consultative process but rather one where the community is informed, and this is not acceptable.

At an Information session held in December (Sydney Boys High), I asked a representative of TfNSW what level of support was there for the project. He advised me there was around 80% community support for the Light Rail. Later at the same session, I questioned how this information was gathered and was shown the Technical Report Volume 1 C – Appendix E where it refers to the results of surveys distributed during the earlier consultation period. It was revealed that the '80%' was being drawn from taking the 'fully supportive and 'supportive' number of respondents which equated to 54% as well as including the respondents who indicated 'undecided' to get to the approximate 80%. This is not a correct representation of support.

A small sample set of what I believe to be just over 480 respondents and such misleading statement raises concerns over what may have been said to other members of the community, and the possible impact on subsequent individual and broader community responses.

I hereby request:

1. Genuine community consultation with the local community i.e. residents and business owners about the route through Surry Hills, its design, construction and integration.

3. LIGHT RAIL VEHICLES (LRV's) SIZE, NOISE IMPACTS

The proposed LRVs are 45 m. long, which is more than 50% longer than the LRVs used on the existing Inner West route (of which the majority of the LRV's used in the Inner West operate on a dedicated rail line). They will be by far the largest trams ever to operate in Australia.

Surry Hills is a quiet residential neighbourhood with occasional noise from traffic passing through, weekend visitors, and periodic groups passing by to attend events at the Stadiums. The increased noise from these occurrences is expected, manageable and acceptable in an inner city neighbourhood based near such sporting/entertainment facilities.

The light rail proposal will see light rail vehicles creating up to a maximum noise of 75-83dB every time a vehicle passes – in excess of the noise levels residents experience now. The excessive noise level and vibration will impact the lives of residents in this area – particularly those on the direct route of Devonshire Street.

According to the CSELR EIS, residents would be expected to deal with “daytime” noise levels up until 10:00PM. The light rail is proposed to run from 5AM until 1AM. This is unacceptable and creates a major difference to the current living conditions of residents. I also understand the light rail vehicles may move all night to return to the opposite end of the line or for repairs.

This is a dramatic change for Surry Hills residents who have invested in a semi-quiet lifestyle despite, being close to the city.

I was advised that the recording of noise levels that I listened to (Information session, December, Sydney Boys High), measured by TfNSW, were taken in Melbourne. I now understand from other community residents it was taken from outside a Hotel. This is not a fair representation of the usual environment for locals on the proposed Surry Hills to Moore Park West route via Devonshire Street.

I hereby request:

1. The Proponent is to be required to comply with the Environment Protection Authority (EPA) Rail Infrastructure Noise Guidelines and the EPA Interim Construction Noise Guideline, and that Devonshire Street, Surry Hills, be designated as being a sensitive land use.
2. The LRV's are no longer than 29m long if traveling through residential areas at the surface level. If the LRV's are longer than 29m, then they are only to travel along specifically tailored routes (such as a sub-surface or tunnel) and or dedicated rights of way (not on residential streets).
3. Speed to be limited to 20 km per hour between South Dowling and Elizabeth Streets
4. Operational times through Surry Hills limited to 05:30 to 23:30
5. No light rail movement between 23.30 and 5.30
6. Frequency limited to a minimum of 5 minutes gap between LRV's
7. Base construction to be engineered and materials used to reduce noise levels to under EPA guidelines between South Dowling and Elizabeth Streets
8. Continuous rail to reduce noise at expansion joints be used between South Dowling and Elizabeth Streets
9. Noise reduction screens to be installed in residential areas impacted – especially between South Dowling and Bourke Streets

10. Pre-construction dilapidation reports be undertaken at the expense of TfNSW by independent contractors for all residences in Devonshire, Parkham and Nobbs Streets. Post construction dilapidation reports to be completed at the expense of TfNSW on the first and third anniversary of the opening of the CSEL. TfNSW to compensate property owners in full for any permanent damage to properties in the above streets due to the construction and operation of the CSEL.

4. IMPACT OF CONSTRUCTION DURING AND POST PROJECT

I am concerned about the impact of construction – including noise and pollution for the proposed Surry Hills to Moore Park West route via Devonshire Street.

I hereby request:

1. It is essential that TfNSW and the construction contractor prepare a Construction Management Plan that addresses the following matters including, but not limited to:
 - a. Noise, dust and vibration arising from construction activities. Mitigation of noise and construction disruption to residences and businesses along the alignment, in particular in Devonshire and Chalmers Streets;
 - b. Access to properties for residents and businesses;
 - c. Pedestrian access on footpaths along the light rail route;
2. Construction work for the proposed Surry Hills to Moore Park West route via Devonshire Street is limited to 7am to 5pm Monday to Friday and 8am to midday Saturday. No work to take place on Sunday.
3. Demolition of Olivia Gardens – construction should be limited to same times and days of week described in Point 2.
4. Noise and dust mitigation to be of the highest standard
5. See above **3. LIGHT RAIL VEHICLES (LRV's) SIZE, NOISE IMPACTS** – bullet point 10 (pre-construction and post-construction dilapidation reports as well as compensation for damage to residential property)

5. NEGATIVE IMPACT ON SURROUNDS - LOSS OF TREES, PARKLAND AND VISUAL IMPACT

I am concerned with the volume of trees that will be removed along the route and in the parklands. There will also be a loss of parklands both during and following construction. Many people in the area either live in apartments or have very small yards. This loss of green space will hugely impact their living standards and wellbeing.

I hereby request:

1. Parkland and Trees
 - a. All parklands should be replaced 1:1 with improvements on facilities
 - b. The Government has suggested they will replace trees 1:7 – this should be enforced with at least 1:1 in the Surry Hills area.
2. Reduce the visual pollution by placing all light rail, electrical cables and electrical substations under ground
3. High design standards for the provision of paving, lighting, trees, Smartpoles, street furniture and light rail stops along the entire length of the alignment, consistent with the City's standards for Village main streets; including the upgrade of Devonshire Street through the reconstruction of footpaths and provision of trees and new lighting (adhering to EPA guidelines).

6. RISK TO COMMUNITY SAFETY

Safety is a consideration in this built up area. The proposed route through Surry Hills passes a methadone clinic, numerous licensed venues and cafes, child care centres and has a primary school adjacent to the lines on Bourke Street.

I hereby request:

1. The safety issues need to be fully reviewed by independent consultants and the full reports made available.
2. The speed must be restricted to a maximum of 20kmph through this section.
3. Frequency limited to a minimum of 5 minutes gap between both LRV's.
4. Ensure no 'shadow or black areas' are created causing safety and security concerns to residents using pedestrian pathways and surrounding areas during evenings.

7. IMPACT ON PARKING AND CREATION OF TRAFFIC CONGESTION

The light rail project suggests removal of 133 parking spots along Devonshire Street. Acknowledging efforts to reduce reliance on cars, many residents do need them for work and family life. The small businesses rely on their customers having easy access to their business through parking.

The Devonshire Street route crosses a number of major arterial roads. It is suggested that the light rail will have uninterrupted priority at all crossings. Indications are that at peak times, when roads are busiest, there will be a 45m train every 2-3min in each direction. A simple calculation means that a train will cross the arterial road approximately every 90 seconds.

The trains are stated to be double in length when there are events at the Sydney Cricket Ground and Sydney Football Stadium, thus reducing this interval. The number of vehicles that can cross junctions at South Dowling, Bourke, Crown, Elizabeth and Chalmers Streets, will be significantly reduced.

I hereby request:

1. Resident/Commercial Only spaces in selected areas and temporary parking permits for the occasional visitors of residents and also for tradespeople. This allows those that have a genuine need to park in the area - residents and businesses - greater access to dedicated parking.
2. The frequency of trains is limited to a minimum of 5 minutes to ensure a suitable gap to allow pedestrians, cyclists and vehicles to cross in safety.
3. TfNSW and RMS to make publicly available the streets where vehicles will have priority over the CSELR.

8. COMPENSATION FOR RESIDENTS IMPACTED

This proposed route will result in the loss of at least 69 homes with people unable to buy back into an area they have made their home. Other properties along the route will devalue as access will be reduced. There are a number of residences on Devonshire Street that will not have any vehicular access i.e. no parking on Devonshire Street and no rear lane access. Simple deliveries of goods like a fridge or services like meals on wheels or disabled taxis will be severely impacted.

I hereby request:

1. Those residents financially impacted by the development of the light rail should be compensated (representing buoyant market value); including acquisition and properties along the route affected.

Yours sincerely

Tanya March