

16 December 2013

Development Assessments Systems and Approvals
Department of Planning and Infrastructure
CBD and South East Light Rail project
GPO Box 39
Sydney NSW 2000
Attention: Director, Infrastructure Projects Branch

Re: CSELR - response to Environmental Impact Statement

I wish to voice my opposition for the proposed design of the CBD and South East Light Rail project (CSELR) as described in the Environmental Impact Statement (EIS) dated November 2013. Specifically, I do not agree with the proposal for a surface route along Devonshire Street as stated in the EIS document.

The Private Clinic Woollahra Pty Ltd is a reproductive healthcare facility which has been in operation for over 30 years. Our premises at 120 Devonshire Street Surry Hills were designed and built to perform minor surgical procedures under intravenous sedation. We employ medical practitioners, nurses and administrative staff. Our patients attend the clinic to undergo minor surgical procedures under IV sedation, or for other medical consultations.

While we are supportive of any improvement to Sydney's public transport network, the proposed surface route along Devonshire Street will have major detrimental effects on the many businesses and residents situated on Devonshire Street and throughout the whole of Surry Hills both during construction and particularly when the CSELR is in operation.

Some of the benefits of the CSELR stated in the EIS include "more reliable journeys", "reduced congestion", "economic benefits", pedestrian improvements" and "reduced noise". While these benefits may be realised in areas of the route who's existing roadways are wide enough to accommodate light rail and where the added burden of light rail will be offset by the loss of commuter buses, none of these benefits will be realised in Surry Hills along the proposed Devonshire Street route. For the businesses and residents in Devonshire Street, along with a large part of the neighbouring Surry Hills community, a surface route along Devonshire Street will be nothing short of a complete disaster.

Despite the Government's media releases stating that they have consulted with businesses along the route, we have not had any meaningful contact from any CSELR representatives other than a single two minute visit from a PR representative without prior notice.

We request that the planned route along the surface of Devonshire Street be reconsidered and replaced with a sub-surface option which will have far less impact on the businesses and residents of Surry Hills. A "cut-and-cover" option beneath Foveaux Street has been identified as a feasible and cost effective and more direct alternative by a local engineer. Alternatively, if the government insists that the Devonshire Street route is to proceed, then a sub-surface "cut-and-cover" option should be implemented.

To date, the government has maintained that “cut-and-cover” or tunnel options through Surry Hills are impractical due to significant cost and for technical difficulties. However the Transport Minister has recently announced that the CSELR route through Moore Park playing fields will be amended to a sub-surface option. While this decision is to be applauded, if the government is prepared to implement a sub-surface route across Moore Park, then the government has not been open and transparent as to the reasons why a “cut-and-cover” sub-surface option along the more direct Foveaux Street path can not be implemented through Surry Hills.

In order to maintain transparency, the government should release details of all cost-benefit analysis and all technical reports which it has relied upon to determine the chosen route through Surry Hills. We believe that a surface route along Devonshire Street, owing to its narrow width and the resultant local traffic congestion, will be a major limiting factor for any future expansion of the CSELR. These limitations would not exist if a sub-surface route was implemented.

Our specific concerns and objections to a surface route along Devonshire Street and the proposed closure of the intersection of Devonshire and Holt Streets are as follows;

1. Loss of loading zone for goods deliveries on Devonshire Street

Reasonable access for the delivery of goods and services to our business is an essential, fundamental requirement of all businesses operating along Devonshire Street.

- a. The kerbside parking spaces immediately outside our premises at 120 Devonshire Street are currently designated “Loading Zone. Monday - Friday 6am - 5pm”. This loading zone is heavily utilised and will be lost if the surface route along Devonshire Street is implemented.
- b. The total and complete removal of all parking and loading zones on Devonshire Street, along with the proposed closure of the intersection of Devonshire Street and Holt Street, and the creation of a pedestrian boulevard will deprive our business of reasonable access to loading/unloading areas for bulky deliveries.
- c. At present, deliveries to the Private Clinic are received 4 to 6 times each day. Designated Loading zones in the vicinity of our clinic are already extremely limited and demand for these spaces from other businesses in Devonshire Street and Holt Street is extremely high. Delivery vehicles are currently causing severe congestion in the surrounding neighbourhood which highlights the already severe shortage of loading zones and access to short term parking. It is unreasonable to deprive long established businesses of adequate goods loading areas within reasonably close proximity.

Request

- Implement a sub-surface Foveaux Street alternative through Surry Hills in place of the surface option along Devonshire Street
- Survey all local businesses to establish the need for sufficient loading zones during business hours in the vicinity of Devonshire Street.
- Replace unlimited or long term parking areas (eg. Clisdell Street) with metered parking.
- Do not close the intersection of Devonshire & Holt Streets.
- Do not close Holt Street to traffic and parking because Holt Street is already of critical importance to providing access for the deliveries of goods and services.
- Implement a parking strategy to encourage a higher turnover of all remaining short-term parking.

2. **Loss of parking for clients on Devonshire Street, including immediate drop-off or pick-up, and short term parking to collect patients.**

Over 90% of all patients who attend the Private Clinic are driven to the clinic by a partner, friend or relative.

- a. If a surface routed option along Devonshire Street is implemented, all parking and stopping zones will be lost. The impact on our business will be severe. It will impact upon the safety of our patients, some who will be recovering from IV anaesthetic and may be required to walk a far greater distance to a waiting car or taxi.
- b. Patients are not permitted to drive themselves home from the clinic following a procedure under sedation. Patients must depend on their partner or support person to be driven to and from the clinic. Some support people remain at the clinic for up to two hours. Some drive the patient to the clinic and then return later to collect the patient. This requires reasonable access to short term parking in the nearby vicinity.
- c. Some patients book a taxi to collect them from the clinic. This requires kerbside street access outside the clinic to permit taxi's to stop while the patient is notified inside the clinic and collected from the clinic by the driver. The anticipated introduction of NO STOPPING zones on both sides of Devonshire Street will prevent TAXI's from stopping outside the clinic to pick-up or drop-off patients who have booked a taxi.
- d. The vast majority of our patients would not benefit from the CSELR as an improved means travelling to the clinic, since very few choose to use public transport as a means of travelling to & from the clinic.

Request

- Implement a sub-surface Foveaux Street alternative through Surry Hills in place of the surface option along Devonshire Street
- Replace unlimited or long term parking areas (eg. Clisdell Street) with metered parking.
- Encourage a higher turnover of all remaining short-term parking.
- Provide a TAXI rank in the vicinity of the Private Clinic at 120 Devonshire Street.
- Review all street parking throughout Surry Hills with the aim of better utilising the few remaining parking spaces.

3. **Ambulance access may be compromised in the event of a medical emergency, potentially requiring stoppage of all traffic on Devonshire Street.**

While medical emergencies are a rare event, all healthcare facilities face the reality that medical emergencies can and do occur which necessitates the immediate transfer of a patient to hospital via ambulance. It is essential in these situations that ambulance services have unhindered street access to the clinic with sufficient space to stop outside the clinic while a patient is assessed, stabilised and transferred.

Request

- Implement a sub-surface Foveaux Street alternative through Surry Hills in place of the surface option along Devonshire Street
- Anticipate and plan for the impact of forced stoppage of the all traffic on Devonshire Street in the event of a medical emergency requiring temporary ambulance access via Devonshire Street.

4. Loss of access to our connection to the sewer main on the opposite side of Devonshire Street.

The Private Clinic’s connection to the sewer main lies beneath Devonshire Street on the opposite (Southern) side of the road. Any future maintenance or repair of this connection or of the house line requires the excavation of the road surface on Devonshire Street which would be impossible once rail lines are installed .

On two occasions since 2003, this sewer line has required servicing. On the first occasion, the road surface required excavation to repair damage caused by a Sydney Water contractor. On the most recent occasion, the house connection was re-lined, however this will not be an option for any future repairs.

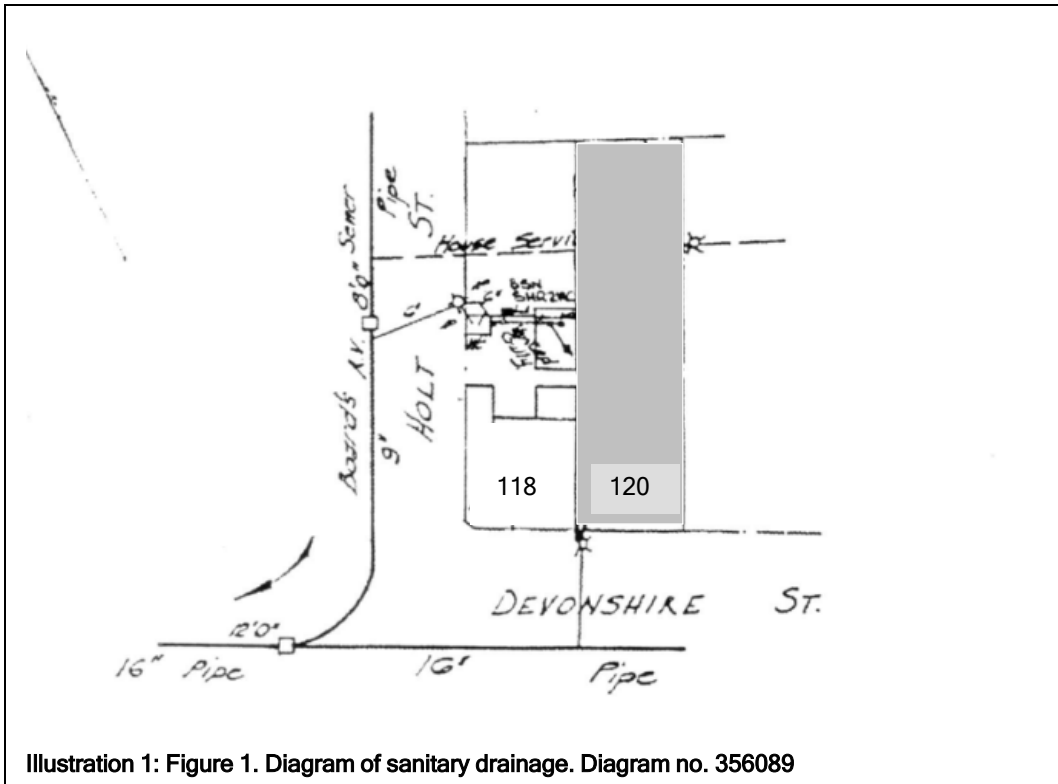


Illustration 1: Figure 1. Diagram of sanitary drainage. Diagram no. 356089

Request

- If the surface route along Devonshire Street proceeds, re-route our sewer connection to an alternate connection point on the sewer in Holt Street.

5. Traffic congestion will increase and traffic flow through Surry Hills will be severely restricted

Within the area bounded by Foveaux Street, Cleveland Street, Elizabeth Street and Eastern Distributor, Devonshire Street is the only alternate East-to-West pathway for local traffic. Changing Devonshire Street to a one-way street in an Easterly direction will severely compromise traffic flow for all local Surry Hills traffic.

Elizabeth and Crown Streets, which intersect with Devonshire Street, both suffer from traffic congestion during the morning and afternoon peak periods and throughout business hours. A light rail line along Devonshire Street would presumably require that priority at these intersections now be given to the light rail on Devonshire Street. Given that it is proposed that each light rail vehicle is 45m long and will pass every 2 - 3 minutes, Crown Street and Elizabeth Streets will suffer from significantly increased congestion.

This will have a major effect on our ability to receive deliveries and for visitors to travel to and from our clinic by private car or taxi.

Request

- Implement a sub-surface Foveaux Street alternative through Surry Hills in place of the surface option along Devonshire Street
- Limit the length of light rail vehicles to less than 45m
- Reduce the frequency of light rail movements along Devonshire Street if a surface option proceeds.

6. A light rail passenger stop at Ward Park will add to the congestion and disruption of traffic and will not provide any benefit to local residents or clients of our business.

As Ward Park is only a few hundred metres from Central Station, the need for a passenger stop in this location is marginal and will only result in the unnecessary loss of valuable public parkland in Surry Hills.

Request

- Reconsider plans to locate a passenger stop at Ward Park because it serves only a modest benefit (being so close to Central Station) but at the high cost of losing valuable parkland.

7. Loss of amenity and loss of significant trees on Devonshire Street.

Devonshire Street currently has a very attractive street-scape, owing to its rows of beautiful mature trees which provide welcome shade in Summer and the collection of neatly maintained terrace houses, restaurants, pubs, churches and businesses. The visually unappealing Northcote Towers are largely hidden from view at street level by the extensive tree canopy however the proposed removal of all mature trees along Devonshire Street and their replacement with overhead power lines will see Devonshire Street become bleak and featureless.

Request

- Place CSELR power lines underground to reduce visual impact.
- Remove existing power poles and place all power and communication lines beneath the surface. This would go some way to improve the street-scape on Devonshire Street following the loss of trees and the introduction of light rail tracks up this narrow street.
- Any mature trees which are deemed to be dangerous and to be removed should be replaced with suitable, fast growing trees.

8. Financial costs to our business

1. The value of the property will be devalued owing to the degradation of the visual appeal of Devonshire Street, significantly restricted vehicular access, increased noise and increased traffic congestion.
2. We will incur additional costs as a result of sound-proofing solutions which will be essential.
3. Loss of business as a result of disruptions and loss of parking.

Request

- Provide financial compensation for any costs directly incurred or attributed to the implementation and operation of the CSELR.

- Reimburse the costs of sound proofing solutions to all businesses and residential premises along Devonshire Street.
- Provide high-priority, immediate support to local businesses in the event of any incident or business interruption, during and after construction.

Summary

The proposed surface route through Surry Hills along Devonshire Street will be devastating for the business and residential community of Surry Hills. Displacing residents, causing loss of trade for businesses in the vicinity of Devonshire Street, with some businesses unlikely to survive. Despite these obvious adverse impacts and contrary to many of the stated benefits of the CSELR, the government has failed to publicly release any cost-benefit analysis or technical reports demonstrating how the Devonshire Street route has been selected and what alternative and potentially superior sub-surface options were considered.

I request that the CSELR project abandon the Devonshire Street surface route and implement a more direct route via a "cut-and-cover" sub-surface option beneath Foveaux Street. If this option were not feasible owing to any justifiable technical reason, then either a "cut-and-cover" solution along Devonshire Street, or a tunnel beneath Surry Hills would be suitable alternate options which would not cause the same degree of irreversible damage to the Surry Hills neighbourhood.

Yours sincerely,

(name withheld)

The Private Clinic