KENSINGTON & WEST KINGSFORD PRECINCT
A resident advisory group of Randwick City Council

31 December 2013

Major Projects
NSW Department of Planning
SYDNEY

Dear Sir

Re: CSELR EIS submission @
http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=6042

The Transport NSW light rail special projects team delivered a one hour presentation to local residents at the KWKP meeting, 9 December 2013. The presentation did nothing to allay residents' serious concerns. After the presentation:

A A majority of KWK Precinct residents expressed concern about the ongoing detrimental impacts from the construction and ongoing operation of the light rail on the Kensington local community of residents, Kensington & Randwick localities and environment and the inevitable destruction of local small businesses.

B A majority of residents do not favour light rail as a public transport system replacing buses in Anzac Parade Kensington & Kingsford. Randwick Local Government area is the DENSEST LGA in Australia WITHOUT HEAVY RAIL.

There is no possibility of ever increasing the LR capacity above 9,000 passengers per hour once it is built (2012 NSW Government Industry briefing 09 April 2013) that is, above a 2-minute frequency from Circular Quay to the Alison & Anzac Parade intersection. This means MAX frequency in peak hours is one tram every four minutes, (due to split in services) to either Kingsford or Randwick.

C A majority of residents questioned why the EIS failed to canvass the alternative option of heavy rail. Heavy rail public transport is better suited to mass transit, reliability and unobtrusive underground construction. Underground tunneling techniques are vastly improved in modern times and are comparatively inexpensive as demonstrated by the rapid construction of heavy rail in China as well as the recently commenced London underground crossrail expansion of 21 kilometres constructing twin bore tunnels to deliver high frequency services linking 38 stations and expecting to carry 200 million people each year.

D A majority of residents are strongly opposed to the NSW government's "urban renewal" or **Urban Activation Precinct** rezoning plans. We note that *"urban renewal opportunities*" is an intrinsic and oft-repeated mantra in the EIS. We refer to three of many references, in volume 1C 9-35 and; the CSELR Industry briefing 09 April 2013, slide 13. Volume 2 Sec 3.1.2.5 headnoted "Randwick UAP announced in March 2013", claims:

> "The UAP program seeks to improve the delivery of infill development through a structured approach to housing release & infrastructure development. Anzac Parade South and Randwick itself are two of the first eight precincts defined for inclusion in the UAP program."

It has most recently been brought to out attention that Randwick CC is a "partner" along with 5 others, the UNSW, the ATC, RMS and Centennial Park Trust, in the NSW Government's $103m Pre-feasibility study.

Unfortunately RCC did not inform us upon acquiring the document in September 2011. Nor was the document made available publicly until August 2013. In view of this serious omission, any public acclaim gained from the RCC Light Rail website, supporting the CSELR project has been obtained by fundamentally flawed means.

Randwick LGA is densely populated and with the gazettal (Feb 2103) of its recent Standard Instrument LEP 2012, residents believe that they have "done their bit for urban renewal". The public consultation in respect of the standard Instrument LEP 2012, was conducted directly under the scrutiny of the NSW Department of Planning. Indeed, an officer of the Department of Planning was seconded to Randwick Council for the duration of consultation. We residents have therefore complied with all "directions and instructions" from the Minister and his right-hand, the Director-General of Planning.

We understand that the "population targets" imposed in the Randwick LEP Standard Instrument were garnered directly from the projected population growth targets and serious qualitative research of the "demography unit" within the NSW Department of Planning.

Consequently, we reject the CSELR's proposed new targets disclosed on the ground of lack of credibility. Projected population growth targets and Sydney's planning are a serious matter of public importance and public interest, and ought not to be subject of the CSELR's private consultant's creativity.

We caution that any attempts to impose high-rise rezoning will be opposed firmly. In addition, we allege the Minister of Planning's proposed rezoning for 65m high-rise residential flat buildings at various LR stops in Anzac parade, represent a pedestrian and traffic hazard. Further Kensington has a huge "underground water" problem. The Botany Aquifer is of 47m

depths in some localities, and specialist engineers have referred to "the underground "cliff edge".

Second, neither Randwick Council nor the NSW government has ever mapped the Botany aquifer (the statutory requirement for detailed land studies), lying immediately below Kensington and Randwick recourse, we question whether Kensington is an area suitable for high-rise development. In other words, we raise directly and appropriately a *section 79C issue* under the *Environmental Planning & Assessment Act 1979* "matter of consideration". We question "suitability of the site" and we raise future issues of liability for both the NSW government and Randwick City Council and their insurers.

Finally, to conclude this topic, we express concern about the impact of the operation of the LRVs, chiefly vibration, on existing Kensington residences, many of which date from federation or shortly after. The destructive effect of vibration is magnified by the track location, lying immediately above underground water. We predict that cracks in local buildings as well as road damage is likely to be costly for local residents as well as the NSW taxpayer.

E We express concern that the NSW government has opted for LR the most expensive option of public transport when compared to buses. We refer to the 2012 MR Cagney study "*Inner city transport strategy*" weblink below - http://www.infrastructure.nsw.gov.au/media/16736/mrcagney_inner_sydney_transport_strategy.pdf

The study at page 9, doubts the strategy of doubling LR capacity by doubling LRVs to 2 x 45m since passenger platform lengths would need to be doubled. The study refers to the Toronto Transport commissions findings that LR 2.5 minute operational frequencies with headways of 4 minutes is the most practical, if "bunching or uneven service" is to be avoided. This, it says, would lead to congested city streets even if signal priority and prepaid ticketing is utilized.

The study suggests, 250 passengers per LRV or 3750 passengers / hour would be the UPPER LIMIT of a RELIABLE LR service.

The study cautions any higher capacity must include completely segregated right of way – an impossibility in Anzac Parade, Kensington and Kingsford.

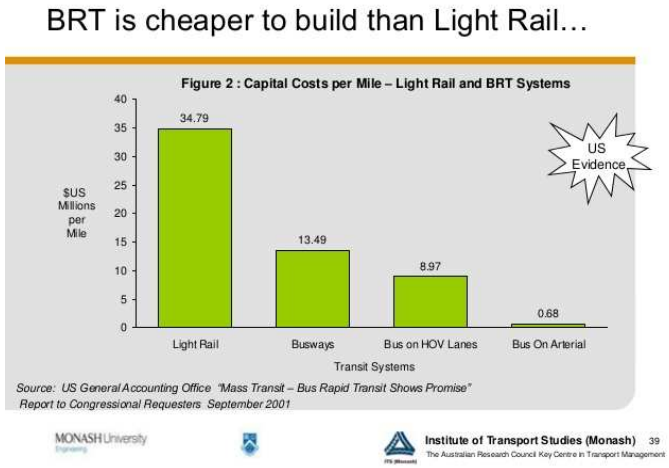
At page 18, the study suggests the "layover" of buses at Circular Quay leads to the perception that "buses" are the major part of city congestion, which is not the case.

The study @ page 10, suggests a LR operational cost of $400 per hour including the capital cost of LRV purchase, however the cost was revised

down, “at the request of the client” to $235 per hour (excludes LRV purchase cost). We note the NSW Government recently purchased

In comparison, high-capacity, low floor, 3-door buses cost $120 / hour to operate including capital cost of purchase.

Professor Currie, International Transport Studies, Monash University exhibited this slide at his Aug 2013 presentation in Sydney, although the US data is in excess of 10 years old, concurrent evidence from the other countries indicate construction and operation of LR compares poorly with buses, with Rouen, France replacing its LR with bus transit in recent times.



F Kensington residents express great dismay at the CSELR’s proposal to remove all kerbside parking in Anzac Parade out of peak travel times that is outside 6 to 10am and 3 to 7pm. The narrowing of the 6-lanes in Anzac parade, to 4 lanes to accommodate the LR tracks, and “no stopping” zones, results in the loss of 400 car parking spaces from Anzac Parade/ Kensington and Kingsford, and thus the ongoing viability of local businesses and on this ground alone, the CSELR ought to be refused. We are dismayed that the light rail team’s approach expressed in clear words, was *“let the market sort that out”* (presentation at our KWK Precinct meeting of 09 Dec 2013).

Quite simply the proposal fails to protect the trading and viability interests of local business and will cause major hardship issues not just in construction phase but ongoing during LR operation. Anzac Parade Kensington has been considerably narrowed incrementally by development over the past 10 years, at times encroaching on public footpaths, on both sides of the road and around the pedestrian crossing at the massive Doncaster development.

We residents express concern that the NSW state government proposes to engage in cavalier treatment of small business. Small business is a huge local employer. Additionally, their presence keeps our localities safe.

The loss of kerbside parking represents the loss of passing trade. The loss in business would be irretrievable. The frail aged, disabled and mothers with prams and small children cannot be expected to park their cars some distance away and walk to shops such as the local pharmacy or flower shop or small retail restaurants. It is self-evident to us that the huge shopping centres at Pagewood would stand to benefit materially from the demise of local businesses, since the frail aged can simply drive up to the door and shop comfortably.

We residents in Kensington have been badgered by Council about improving capacity for "local businesses and Town Centres" in local plan consultations over the past 10 years, the slogan has been "walk to work and employment and reduce car dependence". As a result, we accept Council's suggestions and support the continuity of our local businesses.

The EIS Volume 2 published survey result, of kerbside car parking spaces, is incorrect. We believe the number of available spaces, in respect of **supply** and **occupancy**, is incorrect. The survey inflates the number of spaces under "supply" while deflating the spaces "occupied".

The facts are that we residents attending our local Precinct meetings have raised the lack of, and gradual erosion of on-street parking availability with Randwick Council for years. Council has promised, "to work with local residents to improve parking". Now we have a major project such as LR removing not just residential parking but also local business parking. We cannot agree that a public transport system is so necessary that it must erode people's livelihoods, particularly, when other options have not been explored. And more so, that the CSELR maps indicate that the single greatest component of arterial traffic on Anzac parade in BOTH directions, is the private motor car.

Further, other CSELR maps indicate that the same is true of the City congestion – the single greatest cause is the "private motor car." Why then is there no policy to remove private motor cars?

The EIS lists 3 "needs" and justifications. We believe all 3 are flawed:

1. *EIS claim: "Customers experiencing unreliable journey times made worse by unreliable bus network. LR would improve the reliability of travel and provide efficient connection between city and SE suburbs".*

The EIS does *not* reveal *underlying assumptions* used to create estimated journey times nor does it justify why its overly *optimistic travel times* have been *reduced* since the publication of the April 2013 LR brochure.

Melbourne has the largest light rail system in the world. Its light rail services are generally unreliable. There are many reasons for delays such as traffic obstructions, passengers – disabled, frail aged and mothers with prams, embarking and disembarking, and most of all shared roadways – the streetcar system.

While the CSELR proposal is for "part segregated" tracks, ie. roadways are shared at traffic intersections, cross-over points with vehicular traffic, along the route, all of which are bound to result in delays.

Apart from traffic jams, by far the greatest delay to service reliability are the numbers of boarding and alighting passengers at particular destinations, such as students at the second busiest stop, the UNSW or when embarking at the busiest stop, at Central. We are aware that LR has the ability to gain priority by electronic manipulation of traffic signals, however, the physical obstructions remain – turning motor vehicles.

Buses on the other hand have the ability to overtake if one service is delayed. Not so for LR – if one service is delayed – so are all the rest – due to the limitations of the track system. If there is a "bunching" of bus services then the "bunching" of LR services can be far worse.

We do not accept the EIS stated bus travel times. A bus trip from Kensington to Central currently takes 20 minutes in peak periods and less than 15 minutes off-peak.

It is unlikely the light rail can beat these travel time. Buses are comfortable with many stops in proximity to passengers' points of origin and destinations.

The bus network servicing Anzac Parade Kensington and Kingsford, within the past two years, has been vastly improved and is a immense network, in terms of frequency, comfort and off-peak service. In particular many residents find the Metro-10 and 50 services most pleasing.

The LR services off-peak are expected to operate at 6-minute intervals to Kensington / Kingsford which is a greatly reduced frequency when compared to the current bus frequency.

The technical papers inform us that a majority of the SE bus services are to be removed. We consider this most detrimental.

In the event of LR breakdown, our transport service would come to grinding halt as evidenced by the Inner west light-rail breakdown for 3 weeks from 12 October 2013, during the International Fleet review. If the CSESLR shuts down totally in the event of a serious injury or fatal accident, it means NO PUBLIC TRANSPORT for Anzac Parade, Kensington, Kingsford & UNSW.

The buses have provision for using alternate routes in the event of a route is obstructed. A bus breakdown, the vehicle can be towed away quickly. Towing away LR is far more complicated. It requires use of a following LR vehicle to shunt the broken down one into a siding. All of this means that the tracks will be blocked and public transport service comes to a grinding halt resulting in passenger delays.

We could not find any figures or details for accidents and breakdowns for comparable LR facilities, in the EIS. How would these problems be addressed?

Distance between LR stops is far greater than buses, no doubt to improve travel time. But passengers have long hikes between stops, in heavy traffic. No attention has been given to the frail aged, disabled and mothers with prams in terms of walking, safety and using LR.

Professor Currie's August 2013 presentation *"Tradeoffs between LR and Bus Rapid Transit"* to the NSW Transport infrastructure summit, indicated that rapid bus transit could have similar mode specific factors to LR ie:

- Quality stops
- Simple networks
- Good ride quality
- High reliability
- (Bus) Priority over traffic
- High speed

We question why improvement of bus services was not canvassed as an alternative?

2. *EIS claim: Congestion is reducing Sydney's productivity and urban amenity. The CSELR will free up road capacity transferring trips from buses and private vehicles into LR …leading to 220 fewer bus trips in morning peak periods and sustainable transport.*

We question the accuracy and reliability of this dubious claim. Evidence published in the EIS is contradictory.

If indeed buses were the leading cause of city congestion by buses parked at Circular Quay, then by far the cheapest **alternative** would be to terminate buses outside the city such as Eddy Avenue or Rawson Place or Broadway. That way, Circular Quay would not experience any traffic obstructions from parked buses.

The EIS graphs indicate that the **highest component 67% of AM & PM PEAK traffic volumes are in fact, light motor vehicles.** Further LR track system and overhead cables mess up streets.

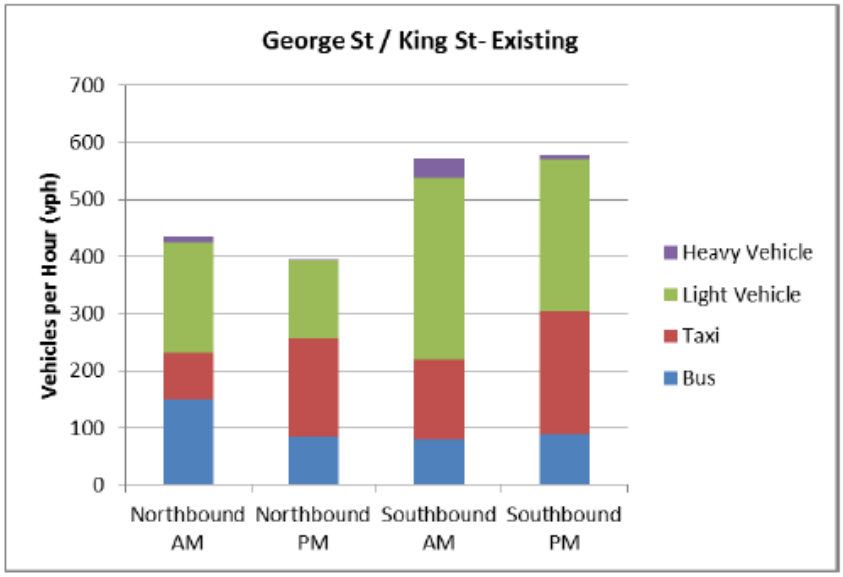
In terms of congestion - Volume 2 page 51 – clearly indicates that **buses comprise the LEAST component** of total traffic composition in the city AM Peak.

Volume 2 @ p51, Fig 2-8 (extracted below, next page) discloses that **greatest component causing vehicular city congestion are taxis, light vehicles (motor cars) and other heavy vehicles.** The graphs show:

- AM Peak, Northbound, buses comprise one-third or 150 of 450 vehicles per hour; and
- AM Peak, Southbound, buses comprise 80 of 570 vehicles per hour

The EIS does not indicate and therefore it would appear that the NSW government has no policy position, ie. NO ACTION is to be taken in regard to city congestion caused by cars other than some vague steps to coerce cars into the cross-city tunnel. We note, the cross-city tunnel has been a dismal failure in attracting usage, and we also note there is no published policy indicating how private motor vehicle usage of cross-city tunnel is to be improved.

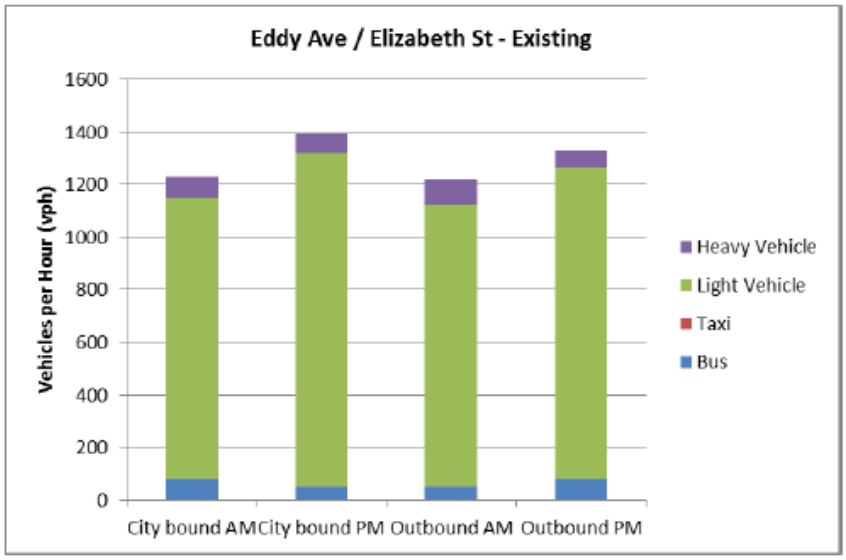
Figure 2-8: CBD precinct existing traffic composition



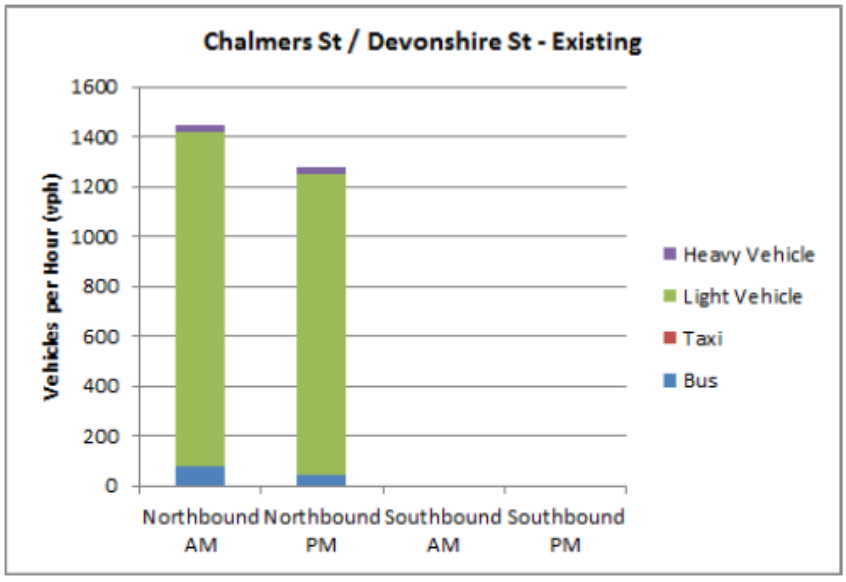
And further volume 2 page 52 – provides evidence that buses comprise the lowest component of total traffic volumes.

- The buses are described as Eddy ave/ Elizabeth st – Existing; and
- Chalmers st/ Devonshire st existing

It is abundantly clear that the greatest component of traffic volumes is comprised of motor vehicles.



** No surveyed taxi volumes available*



** No surveyed taxi volumes available*

We express serious concern about the proposed **massive cut in public transport carrying capacity with removal of 220 buses in AM peak periods.**

2.1 These 220 buses are to be eliminated from Central to Circular Quay in peak hours with buses halted at Rawson Place with passenger transfer to the LR for city journeys. City bound passengers will be attempting to embark on LRVs already carrying Randwick/Kingsford passengers. The removal of 220 standard buses (61 passengers) means the removal of capacity of well over 13,000 passengers/hour by our calculations.

Our calculations:

In 2013, current 'standard' buses carry either 56, 61 or 72 passengers.

Articulated "bendy" buses carry 52 seated and 63 standing or 115 passengers.

In peak periods between 1 in 5 are articulated "bendy" buses.

The proposed LR will have 'CRUSH' capacity of 100 seated to 200 standing (300 total passengers) with 20 services per hour = 6000 passengers.

If for this calculation, we have during 2013 AM peak periods, 1 in 5 articulated buses or 20% per hour. The other 80% are standard buses or 4 out of 5 buses. We use an average standard bus capacity of 64 passengers (ie. 56 +72/2) = 64 passengers.

So 80% x 64 + 20% x 115 = 74 average passengers per bus.

The removal of 220 buses at 74 passengers per bus = 16,280 passengers

When comparing maximum passenger capacity -
220 buses deleted = 16,280 passengers

IN ANYONE'S LANGUAGE THAT IS A MASSIVE CUT IN PUBLIC TRANSPORT CAPACITY.

The question has to be – can the LR accommodate these passengers?

The maximum LR capacity proposed is (300 x 20 services) = 6,000 per hour. Note: the 6000 per hour relates to maximum capacity of 20 services from Rawson Pl to Circular Quay "CQ".

The LR service from CQ then SPLITS into 2 services:

- Randwick (via Alison Road, Wansey Street and High Street) – 10 services per hour or 3000 passengers capacity
- Kingsford (via Anzac Parade) – 10 services per hour or 3000 passengers capacity

The existing bus services TODAY can carry 45% more than the 'crush' capacity of the Light Rail.

The EIS Volume 2 @p 40 – table 2-2 indicates that the total number of passengers on SE buses in 2010 was 8300 passengers in the AM peak with express bus services featuring strong patronage, which is expected to continue.

Clearly, when LR commences in 2019, its limited service availability and carrying capacity, is already outstripped by bus carrying capacity.

The CSELR EIS PASSENGER NUMBER figures DO NOT ADD UP. There is a huge shortfall of carrying capacity.

An alternate calculation suggested by Transport NSW is this:

The State governments Transport NSW website explaining "myths" says this:

> "If we could replace four of the buses heading down George St at peak hour with one tram, there would instantly be less traffic congestion."
>
> So Transport NSW has 1 LR service = 4 buses.
>
> Thus 220 buses = 220 ÷ 4 = about 55 LR services.
> But 55 LR services per hour is a figure the LR experts suggest is unworkable.

2.2 We express concern that there is no LR carrying capacity to meet the needs of growing Sydney. There is no capacity to transport the 1000's expected from the State Government's proposed two 'Urban Activation Precincts' to be imposed into the already over-crowded Randwick local government area.

There is no LR carrying capacity to meet the needs of UNSW targeted growth to 90 000.

2.3 Transferring passengers at Rawson Pl must embark on LR with max capacity of 6,000 per hourly AM PEAK

This represents another ground for service delay. The minimum "transition time," taken by disembarking passengers at Rawson Place, to embark on city LR service is 19 minutes according to Prof Currie in his August 2013 NSW Transport infrastructure summit, "*Tradeoffs between LR and Bus Rapid Transit*" (slide 30). Prof Currie calls this a "transfer penalty." His research indicates that passengers do not like transferring journey modes, ie. changing over from bus to LR.

Another example, is when the M2 was opened in the mid-1990s, Westbus assumed most passengers would want to use bus services on the new road to travel to Epping railway station, from where they would catch a train. Within six months nearly all services had been rescheduled direct to the city because passengers overwhelmingly preferred a seamless trip to work.

2.4 When calculating journey times, the EIS fails to take into account he transition penalty for those passengers transitioning from buses to LR at Rawson Place.

2.5 We find no basis for the EIS claim *"Light rail's improved reliability provides better frequencies when compared with the existing bus solution. Despite high timetabled frequencies for buses, their interaction with road congestion often results in "bunching" of services. This does not align favourably with customer needs. By contrast, light rail offers a true "turn up and go" service with reliable service spacing".*

On the contrary we believe the travelling public will experience longer wait times.

3. EIS claim: The current system does not have capacity to support population and economic growth. The CSELR would support future transport capacity, quality and reliability.

The Anzac Parade corridor was declared running at above 100% of bus carrying capacity' by the STA in 2010, so that 'no additional

peak hour services (am or pm, Circular Quay or Central) could be added to any route using Anzac Parade.

Articulated or "bendy" buses were introduced to replace standard buses, with consequences.

EIS claims 9,000 max passenger capacity but states 20 LR /hour max frequency on p 28, Volume 5 technical paper 10 section 1.5.5.3.

But 20 LRVs mean a maximum of 20 x 300 passengers = 6000 passengers per hour.

Frequency can never be increased due to adverse impact on major intersections (South Dowling, Lang & Anzac, Elizabeth St, Crown St & Devonshire etc).

Obviously, if LR frequency is increased, then it will lead to slower travel times.

Yet the bus capacity being cut is up to 3 times the capacity of the LR service capacity.

Light rail ONLY cuts traffic congestion GROWTH by 1% compared to no light rail

Other issues

4. **Loss of over 1,000 parking places** along the entire LR route to be signposted "No stopping" 24 hours a day.

   In Kensington and Kingsford the EIS calculates 400 kerbside spaces will be lost when the 6-lane Anzac Parade is reduced to 4 lanes. It is unclear whether there will be further narrowing "pinch-points" at LR stops to accommodate central passenger platforms. The loss of kerbside parking represents a significant loss of passing trade for small businesses and therefore their viability.

   In Volume 2, at 2.8.2 Parking and kerbside access, the EIS maps the Kingsford Precinct split into two sections:

   - Anzac Parade **North** – from intersection Alison Road/Dacey Ave to High street
   - Anzac Parade **South** – from intersection of Anzac Pde & High st to Anzac Pde/ 9 ways

The EIS graph exhibited in Volume 2 -Table 2-36 Anzac Pde North parking supply @ p87
Note: These kerbside parking spaces are to be lost

Table 2-36: Anzac Parade North special kerbside uses and parking supply

Anzac Parade North Kerbside Restriction	Special Kerbside Uses and Parking Supply by Time Period		
	Pre AM Peak	Inter Peak	Post PM Peak
Car Share, Hospital, Mail Zone	1	1	1
Disability Parking	0	0	0
Loading Zone	0	0	0
Taxi Zone	0	0	0
Total – Special Kerbside Uses	**1**	**1**	**1**
Short Stay Parking (≤1P)	4	52	31
Long Stay Parking (Restricted)	7	7	0
Long Stay Parking (Unrestricted)	73	94	119
Total – General Parking	**84**	**153**	**150**

Volume 2 - Table 2-37 Anzac Pde South parking supply @ p89

Note: All these kerbside parking spaces are to be lost due to "No stopping restrictions" following narrowing of Anzac Parade from 6-lanes to 4-lanes.

Table 2-37: Anzac Parade South special kerbside uses and parking supply

Anzac Parade South Kerbside Restriction	Special Kerbside Uses and Parking Supply by Time Period		
	Pre AM Peak	Inter Peak	Post PM Peak
Car Share, Hospital, Mail Zone	0	0	0
Disability Parking	0	0	0
Loading Zone	4	4	2
Taxi Zone	2	2	2
Total – Special Kerbside Uses	**6**	**6**	**4**
Short Stay Parking (≤1P)	32	68	25
Long Stay Parking (Restricted)	20	20	4
Long Stay Parking (Unrestricted)	173	173	232
Total – General Parking	**225**	**261**	**261**

Parking survey results: Volume 2 Section 6 - 6.3.4.2 Kensington Precinct

The EIS at Volume 2 page 257 maps out survey results indicating occupancies

- Pre-AM peak
- Interpeak and
- Post PM Peak

It was NOTICEABLE that the survey results were **incorrect**, the results indicated an over-generous supply of kerbside parking spaces – when this is not the case.

For example:

- Pre-AM peak and Interpeak periods, Addison street, Kensington was surveyed as 70-80% occupied – **this is untrue – Addison street is parked at FULL or almost 100% capacity 24 hours/ 7 days/ week**
- Pre-AM peak Villiers street and Interpeak periods, Kensington was surveyed as 70-80% occupied – **this is untrue –Villiers street is parked at FULL capacity or near to 100% 24 hours/ 7 days/ week**

We conclude that the parking table for Kensington streets Vol 2, Section 6.11 @ 260- Demand, Supply & Occupancy **is therefore incorrect**

Table 6-11: Kensington – Demand, Supply and Occupancy by Zone

	Pre-AM Peak			Interpeak			Post-PM Peak			Daily
	Demand	Supply	Occupancy	Demand	Supply	Occupancy	Demand	Supply	Occupancy	% High Turnover
Zone 1	501	654	77%	570	706	81%	510	703	73%	35%
Zone 2	538	702	77%	647	755	86%	594	732	81%	33%
Precinct Total	1,039	1,356	77%	1,217	1,461	83%	1,104	1,435	77%	34%

Similar inaccurate car parking survey results for Kingsford were presented in Volume 2 p 265.

Table 6-12: Kingsford – Demand, Supply and Occupancy by Zone

	Pre-AM Peak			Interpeak			Post-PM Peak			Daily
	Demand	Supply	Occupancy	Demand	Supply	Occupancy	Demand	Supply	Occupancy	% High Turnover
Zone 1	822	1,275	64%	1,113	1,335	83%	961	1,335	72%	40%
Zone 2	154	423	36%	230	436	53%	210	439	48%	45%
Zone 3	472	890	53%	732	888	82%	635	888	72%	32%
Precinct Total	1,448	2,588	56%	2,075	2,659	78%	1,806	2,662	68%	38%

Other issues

5. Kensington & Kingsford issues

5.1 We express concern about the stated alternative of re-routing traffic around local streets. We already experience significant problems with the expanded use of local roads and engaged in extensive consultation with Randwick Council repeatedly. The RCC promised us in two separate detailed consultations their "Local Area Traffic Management" surveys to institute certain "measures" addressing cross-regional traffic to rat-runs through local streets in Kingsford & Kensington however, implementing the LATM results was put "on hold" with the emergence of the LR proposal.

Now we are told that the CSELR proposes to eliminate over 70% of right turns from Anzac Parade. We object to the reduction of uses proposed for Anzac Parade.

The CSELR maps and graphs indicate that the greatest component of traffic in Kensington is through-traffic from outside of Kensington and Kingsford, namely USNW daily student traffic. Clearly these students travel from origins at great distance from public transport which means that improving transport at UNSW will make no difference to them.

We express concern that the CSELR will result in degraded traffic conditions on our local and on Anzac Parade, a major arterial state road, with a ripple effect throughout the region reaching as far as Sutherland or even Wollongong.

5.2 We express concern about the r**educed safety for local school children**, from local schools, young children from Our Lady of the Rosary, Primary Catholic school; and high school children from Our Lady of the Sacred Heart College. These schools have been excluded from the EIS – what is the reason for this?

We understand that the EIS consultation only included Sydney Boys and Girls High Schools.

5.3 The EIS contains many conflicting and misleading statements, such as location of cycleway in Wansey Rd said to be on west side in multiple sections and on the east side in other sections.

With this amount of obfuscation, we question are there going to be cycleways at all? How, when all LR roads are to be narrowed considerably?

5.4 We do not accept that the CSELR will reduce student parking and traffic.

The CSELR facts and figures do not accommodate current student capacity. Indeed, the CSELR facts and figures **UNDERQUOTES** current student numbers, which is a matter of concern to us.

We believe there will just as many or possibly even more students attempting to motor around and park in park in our local streets.

The forecast numbers for UNSW (some used for capacity modeling) claimed current student attendance around 37,000 and future target growth to 50,000 (Vol 2 – Section 3.1.2.3 @ p111). Yet actual current students number around 50,000 and targeted growth is to 90,000 - acknowledged in other sections of the EIS.

We express concern that the CSELR is based on flawed assumptions.

5.5 We express serious misgivings about the deletion of UNSW express services in AM Peak this amounts to 48 services per hour. We have observed that Sydney Buses provide this transport service with precision. For example, the express AM PEAD bus services around 8am is16 minutes precisely from Central to UNSW High street.

We doubt that the CSELR can improve on this travel time performance.

In addition, we express concern that all express bus services to Sydney Boys and Girls High school are to be deleted.

5.6 We express concern about the deletion of 135 “all stops” AM PEAK bus services.

5.7 We express concern about the loss of parking space in the vicinity of South Sydney Juniors, Kingsford. We believe the stated loss of 173 car spaces is an underestimate by 80.

We deplore the factual errors in the EIS.

5.8 We express concern that the EIS does not clearly state all road closures, right hand turn closures, road direction changes nor additional traffic light signalisation nor changes to traffic signal durations - in any one of the Technical Papers. **How can the community possibly understand implications, if vital information is missing**.

6.1 Loss of Trees

It is a matter of deep regret to us residents that the LR construction means the loss of many ancient irreplaceable trees. We do not think that such destruction ought to be undertaken when other options of public transport have not been explored. And particularly so, that we believe the LR project will not be meet the needs of a growing city.

We list below some of our concerns in relation to the loss of local trees.

The EIS allocates **"regional sensitivity"** to the majority of Randwick LGA trees, lamenting EIS changes would result in considerable reduction to the quality of the landscape. ie. high landscpe adverse impact during operation (never mind construction) - refer EIS Trees Vol 5 @ p148 EIS

- **Centennial Park**, Port Jacksons & Moreton Bay figs @ RR Racecourse
- Residential **private rear gardens** in Doncaster Ave, Kensington (the future LR depot),
- **High Cross Park,** High street / Avoca street Randwick - a community gathering space. An important cross road with mature culturally important Cook Pines significant trees listed on RCC tree register, visual landmark area. The EIS notes park's visual connection to Captain Cook statue and war memorial - predominantly owning to Cook Pines

Despite the wailing lament - 85 trees are to be removed along Alison rd (from Doncaster Ave to Wansey rd) and approximately (does this mean possibly more??) *30 mature fig trees with overhanging branches to be removed from Wansey Rd and within George Dan reserve, to accommodate LR. These trees "define the character and feel of this residential area, the built form of which is predominantly distinguished by federation and interwar dwellings that have a racecourse outlook":* p143.

The EIS considers that there would be **"considerable reduction in landscape quality** of this avenue of trees (Wansey road), **a regionally sensitive landscape feature,** resulting in **high adverse landscape impact."**

What all this means is that these trees are not just irreplaceable, the EIS makes clear there are **no intentions to ever replace them with any trees** - a fire hazard to overhead electricity wires...V5 @151:**"**.

High Cross Park – foreshadows removal of 16 trees, including significant figs and Cook Pines with the park to be enclosed in mesh wire.

The changes are to result in considerable reduction of landscape features ie. **high landscape impact**.....during operation (means its ongoing and forever!)

Light spill at night @ 164 from 24 hour use during construction – lighting would be brighter than current traffic and street lighting in High Cross Park.

Local Doncaster avenue residents' rear gardens ie. 66A Doncaster LRV depot: "considerable change in amenity of these gardens of neighbourhood sensitivity" - minor impact during construction - during operation - overshadowing to adjacent properties from long noise attenuating walls, blocking morning sun, not likely to impact living spaces of homes; but reduction in solar access will change landscape character. Operationally, considerable change to amenity of residential rear gardens!!!

There's more - along **Doncaster Ave, Kensington**.v5 @ 158...High adverse Visual impact persists forever - or as it says "during operation" Instead of views of peaceful trees we are to have views of trundling meta red rolling stock and low frequency painful sounds and vibrations berating our eardrums.

6.2 Views & Trees – Loss of character

We express concern about the loss of views, loss of local character and general loss of our neighbourhood amenity.

Daytime views south on Alison road V5 @ 159– RRRacecourse – Removal of "ornamental landscaping at RRR – generally of good quality with consistent pattern of trees and shrubs, strong visual landscape connection, softening views of iconic racecourse building. This change results in considerable reduction of visual amenity & high adverse impact.

The removal of trees and shrubs will be visually prominent with limited screening, resulting in the creation of a "**large barren opening with limited opportunities for landscape treatments"**. The combination of LR infrastructure and stabling yards, will introduce **additional visual clutter at street level"**. Operations assessment: Considerable reduction in this view of regional sensitivity – resulting in **high adverse impact during operations** (ie. forever).

Daytime views NW on Alison road @ RRRacecourse Vol 5 @ 160 – RRR has landmark status. Racecourse is visually prominent with canopy of mature Port Jackson and Moreton Bay figs, following Alison rd boundary. This avenue of trees is *particularly* important in setting the character o the Racecourse providing a visual edge to the site contributing to the streetscape. Figs are to be removed to accommodate construction works. View focused on worksite. *Works change character of this view substantially- changes are not visually consistent with the existing character of RRR landscape.*

Construction Assessment: High adverse impact during all stages. Alison Road reduced from 6 lanes to 4. Row of fig trees are NOT to be replaced. Instead, but would accommodate light rail corridor permanently. Views would be of visually prominent (length + scale) 45m LRVs moving through. Project would introduce *visual clutter* at street level.

Operations assessment: Changes constitute considerable reduction in visual amenity – result *high adverse impact* – ie. it's permanent.

Wansey Road vol 5@ 164 – *Night light spill* – removal of tree cover would allow existing lighting to be seen widely. Construction traffic would be visually prominent at night. During construction there would be considerable reduction in the amenity of adjacent areas. **During operation** – night light spill into George Dan reserve – lighting at LRV stops. Largely due to the potential for direct headlight intrusion into private sites, it would create a "noticeable reduction in the amenity of the area of high district brightness," but result in negligible visual impact @ 165.

Kensington - Tay Reserve vol 5 @ 184 – direct impacts during construction, a number of trees are to be removed. Its function as open space would be degraded. During operation trees would be replaced, they would be of "smaller size and maturity". The SIZE of the park would be reduced overall and the amenity it provides to the area diminished – Noticeable reduction in quality of landscape feature of local sensitivity.

Kensington – Anzac parade street trees from Alison Rd to Kingsford vol 5 @ 185 – Considerable direct impacts 120 trees of varying species, age & quality to be permanently removed. Kensington in particular, & UNSW would experience the greatest change in character due to this loss. During construction: considerable reduction in landscape quality of regional visual sensitivity, resulting in **high adverse landscape impact**.

Kingsford landscape impacts vol 5 @ 189 – 9 ways roundabout to be demolished during construction and temporary intersection to be established. Two work sites located utilizing centre of Anzac Pde at Sturt street and the second, between Anzac Pde and Rainbow st. Removal of vegetation at these sites including mature figs and eucalyptus. Replacement trees would be of smaller size and maturity resulting in noticeable and considerable change in landscape quality.

During construction: a noticeable reduction in landscape quality. “Footpaths would be improved and Kingsford bus interchange would be connected to main street by more direct pedestrian routes”. Operations: noticeable reduction in landscape quality but changes are somewhat compatible with surrounding urban landscape.

Daytime views beyond Kingsford 9 ways to Maroubra @194 Central Car parking to be removed, mature trees characterizing the area to be removed. **Reconstructed** signalised intersection is prominent. Worksites are not consistent with area character. **Operationally**: considerable reduction in view amenity.

Kensington/ Kingsford - @ 191 - Daytime visual impacts – removal of street trees on central median strip to accommodate site works. Changes are not visually consistent with the uniform view. During construction – **considerable reduction in visual amenity and high adverse visual impact.** Existing street trees would be removed and replace by some trees where space permits. **Operations –** @ 192 - planted median strip to be replace with LRV & tracks – noticeable reduction in view amenity.

7 Conclusion

This CSELR EIS presumes that the residents of Sydney’s SE suburbs focus their lives on the City of Sydney. It speculates that the introduction of a corridor transport system, the LR would eventually encourage people to relinquish their private motor cars. Randwick council speculates in similar fashion. It would appear that “giving up the private motor car” is an unrequited dream of transport and residential town planners.

Nothing could be further from the truth. The federal government provides a subsidy of about $2500 per car. People utilize cars for leisure, shopping, taking their children to school, holiday, weekends, family trips and sheer convenience.

A previous Director General of Transport NSW (and organizer of the Sydney 2000 Olympics public transport miracle) wrote a concise and fact based piece on light rail versus buses, published by the Sydney Morning Herald in 2006. None of his points can be refuted and remain relevant today.

> “The benefit of buses is they cost very little to run and are flexible to operate. Neither is true of light rail, which is comparatively expensive to run and delivers a corridor, not a network, of flexible services. If a road is closed, a bus can take another route. If patronage changes, the route can be altered. Light rail can't respond in this way.

http://www.smh.com.au/news/opinion/time-to-get-off-the-light-rail-bandwagon/2006/01/16/1137260000769.html