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The Department of Planning and Infrastructure GPO Box 39 Sydney NSW 2001

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CBD and South East Light Rail Project

I strongly support light rail as a public transport solution. There have been longstanding calls for a new service that links Circular Quay with Central Station, and Central Station with the Centennial Parklands, the sporting stadia, the University of NSW and Randwick Hospital and I support this.

Traffic congestion is a serious and growing problem. The central business district is choked. particularly with buses which halt to a standstill during peak hour, and this costs business around \$4 billion a year. By 2020 that cost is projected to more than double to \$8 billion if new transport options are not provided.

People leaving events at the sporting stadia and parklands by private vehicle regularly create major traffic gridlock extending across the city. Event organisers are unwilling to provide integrated ticketing because they say there is no real mass transport alternative to the private car. Patrons regularly park on the grasslands of Moore Park east, alienating much needed green open space from the local community.

Light rail is fast, reliable and can carry over three times as many people as buses. The proposed CBD and South East Light Rail (CSELR) project will provide a new transport option that will remove buses from the CBD and eastern suburbs, and transport large volumes of passengers efficiently.

However, a number of significant potential impacts need to be prevented before the project is approved to ensure it improves the public domain, protects amenity, maintains access to businesses and homes, does not displace pedestrians and cyclists, and minimises loss of parklands and trees.

My submission focuses on the parts of the route which fall within the Sydney State electoral boundary and requests that Transport for NSW address the concerns of residents and businesses. some of whom oppose the proposed project due to impacts.

Evidence other Options considered

A number of Surry Hills residents adjacent to the proposed light rail route have proposed alternative routes including Campbell Street, Oxford Street and Foveaux Street. The Foveaux Street underground proposal was devised by an engineer engaged by residents. A new option has also been proposed by the Save Our Sydney community group for light rail to go up Devonshire Street only and down Foveaux Street, preventing loss of trees and/or parking on Devonshire Street.

Transport for NSW should be required to demonstrate that these options were genuinely considered and provide comprehensive reasons as to why they were rejected.

Some people in the community say that light rail is not needed and not the most efficient option to respond to growing demand for transport. They say Transport for NSW should be required to provide a cost benefit analysis that compares light rail with other options such as more bus services.

I share my constituents' concern that all documents used to determine the final route proposed by Transport for NSW including why other options were excluded, should be made public as a part of any approval, pointing out community concern that requests for associated documents under the Government Information (Public Access) Act have been refused.

Some residents say that the proposed CSELR will reach capacity within a few years, precluding future expansions to other areas such as Maroubra and Botany. The final approved route must be able to expand services into the future.

Construction Noise and Disruption

Twenty four hour works are proposed for the CBD and outside of the CBD between 7.00 am and 11.00 pm, although standard hours will be considered where it is "reasonable and feasible".

Noise, dust and vibration from construction has the potential to significantly impact on the peaceful enjoyment of people's homes, particularly in Surry Hills but also in the CBD, and for businesses along the entire route. It is essential that Transport for NSW strikes the right balance between expediting works and providing residents and businesses with respite.

While some interruption to ease of access to properties will be expected at certain times, at no time should access be blocked and at all times access should be reasonable.

Restrictions on pedestrian activity should be minimised, with access provided across the entire construction zone.

Transport for NSW should establish a public communication process to keep businesses and residents informed about all upcoming works that will impact on them, and engage with them to develop the best measures to prevent and mitigate impacts, including determining when respite is needed. Transport for NSW should establish a community liaison group to work with local residents and businesses on an ongoing basis.

Students in relevant disciplines at UNSW, UTS and TAFE Sydney and Randwick should be used to assist with the communication process.

Hours of Operation – Surry Hills

A number of Surry Hills residents are concerned that the light rail service down Devonshire Street will operate after 10.30 pm up until 1.00 am. They point out that noise levels are predicted to exceed average and maximum noise trigger levels under the Rail Infrastructure Noise Guideline (RING) Environment Protection Authority and therefore services should cease late at night to protect amenity and the peaceful enjoyment of adjacent residents' homes.

While services will cease between 1.00 am and 5.00 am, the EIS indicates that light rail movements will continue during this time for maintenance, potentially with one movement every six minutes. I share constituents' concern that light rail maintenance activity outside of services in residential areas late at night and early in the morning should be restricted.

There is a small number of homes adjacent to the light rail tracks on Devonshire Street and some residents have suggested that these homes be provided with double glazing on windows. Given RING trigger levels will be exceeded I support this proposal. Transport for NSW should test ambient noise levels of each home before construction, then during construction followed by operation to determine which houses have been impacted and compensate those affected.

Many suggest that tracks should be enclosed with rubber to reduce noise with the base constructed to limit vibration. Transport for NSW should be required as a condition of consent to use best practice technology to reduce vibration and noise from tracks, with decisions based on protecting community from impacts not saving costs.

Speed of Light Rail Vehicles - Surry Hills

Light rail along Devonshire Street is proposed to travel at 40 km/h uphill and 45 km/h downhill. This is too fast for this inner city village hub and would create significant impacts.

The faster the vehicles, the greater the noise impacts and noise is expected to exceed RING triggers both in the day and at night through Surry Hills. If speeds were reduced, noise impacts on residents would be reduced.

There are real concerns among adjacent residents that light rail along Devonshire Street will split Surry Hills and remove its village feel. It is vital that light rail pedestrianises Devonshire Street, preventing it from becoming only a transport corridor. Slower speeds would prevent the need for barriers and enable pedestrians and cyclists to safely cross the tracks. The light rail speed proposed for George Street is 20 km/h and I support calls for this speed to also apply along Devonshire Street.

Tree Loss

The project proposes to remove approximately 760 trees. There is a great deal of concern in the community about the loss of heritage trees in Surry Hills and Moore Park. Transport for NSW has indicated that it will replace trees at a ratio of 2:1 and 8:1 depending on their size.

Trees provide shade, encourage bird life, filter pollution from the air and are visually attractive. The loss of such a large number of trees will have a serious impact on the amenity and beauty of the precincts adjacent to the light rail tracks. I share widespread community view that there should be a net gain in trees and tree canopy as a result of the project.

Where heritage trees are removed, Transport for NSW should be required to replace them with mature trees and should immediately procure trees upon project approval. In the CBD and Surry Hills, tree species should be consistent with City of Sydney Tree Management Policy.

Surry Hills Community Transport

The Northcott Housing Estate includes accessible homes currently occupied by tenants with mobility impairment who rely on community transport to get to the shops, medical appointments and community centres. I understand that their limited mobility prevents them from walking even short distances and that they would not be able to access the proposed crossings to get to the northern side of Devonshire Street or the proposed Ward Street light rail stop. If these tenants cannot access community transport, they will be unable to leave their homes and become socially isolated.

Community transport for these tenants is more than a charter bus service; staff collect tenants from their homes, walk their shopping bags back, and use the wheelchair loader with some passengers.

Tenants with mobility impairments are located in homes on the southern side of Devonshire Street adjacent to the street where community transport collects them. I understand South East Sydney Community Transport proposes a solution involving a turning curve and bay opposite 166 Devonshire Street with permanent parking on the footpath.

It is essential that Transport for NSW works with Housing NSW, South East Sydney Community Transport and tenants solve this serious problem and ensure mobility impaired tenants are able to access community transport services during both construction and operation.

Second Light Rail Stop - Surry Hills

The proposed light rail travels through Surry Hills along Devonshire Street, extending almost a kilometre between Chalmers Street and Bourke Street, yet only one stop is proposed. Surry Hills must not be a mere thoroughfare connecting other areas; the CSELR must adequately service Surry Hills and adjacent communities.

The distance between the proposed Ward Park stop and the Moore Park stop is extensive with large populations in between in Surry Hills and Moore Park, as well as populations in adjacent Redfern and Darlinghurst areas.

Transport for NSW should provide a second stop in Surry Hills between Ward Park and Moore Park, just east of Bourke Street in Wimbo Park. This may mean it is appropriate to move the Ward Park stop slightly west.

Permanent Loss of Moore Park Land

It is vital that loss of Moore Park land is minimised.

Moore Park is part of Governor Macquarie's 1811 Sydney Common bequest, which set aside 405 hectares of land for the outdoor recreational needs of present and future Sydney generations. Only one-third of this bequest remains open public land due to successive alienations including for the Eastern Distributor, the SupaCenta, event car parking, and the bus-way.

The parklands face increasing pressures due to significant residential growth in surrounding suburbs. The Green Square redevelopment alone will see 40,000 new residents adjacent to the parklands living in apartments with no private open space; older adjacent suburbs such as Paddington and Surry Hills have low ratios of open space. There are limited and diminishing opportunities to provide new space for passive recreation in the inner city and it is essential that what is left is preserved.

The proposed light rail project will result in loss of valuable green open space including at the:

- Entry portal in Moore Park west;
- Substation/compound in Moore Park west south of the entry portal;
- Entry portal in Moore Park east:
- Station in Moore Park east; and
- Light rail track along Moore Park east both north and south of Lang Road.

It is not clear from the Environmental Impact Statement how much land will be lost at these points and I share strong community concern that Transport NSW be required to work closely with the Centennial Park and Moore Park Trust to preserve land and minimise loss. The tunnel portal from the South Dowling Street/Eastern Distributor bridge should be designed to prevent loss of green open space. Fill from the excavation should be used to raise the level of the park edge to minimise the impact of the portal on the park edge. The new raised level should be re-turfed.

It is essential that substations and charging infrastructure on Moore Park are located underground and covered with grass. The size of the Moore Park station should be significantly reduced, to minimise alienation. The second storey is visually intrusive and unnecessary and should be removed to prevent blocking vistas and views.

There is a strong community view that the light rail should travel on the existing bus-way, given it will replace the number of bus services in the region allowing remaining services to be redirected onto Anzac Parade. Transport for NSW fails to support this community proposal stating that

keeping the bus-way will allow it to expand bus services in the future, use buses during events and because it would require significant pruning or removal of large adjacent fig trees.

Transport for NSW should be required to locate the light rail on the bus-way or prove why the existing bus-way is not a better option for the parklands, taking into account the views of the Centennial Park and Moore Park Trust.

When the Eastern Distributor carved off some 2.2 hectares of Moore Park removing the western edge forest, to compensate, the Government committed to removing car parking from Moore Park, which was supported by a plan of management. While cars remain on Moore Park east, they no longer park on Moore Park west and the State Government should be required to provide some form of compensation for loss of Moore Park land as a result of the CSELR. An example could be planting trees throughout the parklands.

The Environmental Impact Statement indicates that at least 77 trees will be permanently lost in the parklands.

Trees are essential to the parklands. They provide shade, attract native birds and increase urban biodiversity. The trees provide a carbon sink helping to mitigate climate change. Trees add to the amenity of the parklands and regular park users have strong emotional attachments to the trees.

Transport for NSW should be made to work with the Centennial Park and Moore Park Trust to avoid removal of any trees, particularly healthy, native old growth trees. I support the proposal to plant more trees than are removed to create a net gain in trees. Tree canopy must also be protected and mature trees should be planted to protect existing canopy. Species should be consistent with the Centennial Parklands Tree Master Plan.

Pedestrian and Bicycle Footbridge - Anzac Parade

The sheer number of people needing to cross Anzac Parade during events at Moore Park and the sporting stadia slows pedestrian journeys and can further exacerbate traffic disruptions. Anzac Parade urgently needs a pedestrian and cyclist overpass close to the sporting stadia and this should be a condition of consent for the proposed CSELR project to ensure a holistic response to event related traffic congestion.

Paving, Lighting, Street Furniture, Smartpoles and Stops

The proposed CSELR crosses the CBD, Surry Hills and Moore Park within my electorate. These areas have different characteristics that must be preserved and reflected in the built facilities and infrastructure for light rail.

Paving, lighting, street furniture, Smartpoles and light rail stops should be consistent with City of Sydney standards within the CBD and Surry Hills, with Transport for NSW required to work with the council. High quality concrete tile pavers consistent with the City of Sydney standards for village main streets must be used to upgrade footpaths on Devonshire Street.

Stops and shelters should be designed to maximise transparency and visibility with pedestrian barriers avoided where safe to do so. Clutter and signage should be kept to a minimum to reduce visual pollution.

With major road and footpath surface upgrades required, the CSELR provides a unique opportunity to improve the public domain through the undergrounding of existing overhead cables, particularly on Devonshire Street. Transport for NSW should work with energy and telecommunication providers to underground these services, which would remove clutter and reduce the visual impact of overhead wires introduced from the light rail.

Within Moore Park, Transport for NSW should work with the Centennial Park and Moore Park Trust to ensure that built facilities and infrastructure are consistent with parkland standards.

Pedestrianisation of George Street

I strongly support proposals to pedestrianise George Street between Hunter Street and Bathurst Street.

While the majority of the 1.27 million trips within the city centre each day are on foot, pedestrians have little space and are often pushed to inadequately sized and overcrowded footpaths making the experience of travelling across the city unpleasant and time consuming, discouraging street activity and creating a negative experience for visitors.

Sydney's CBD has long needed a boulevard that encourages walking and cycling. The CSELR project is a good opportunity to provide this.

The pedestrianisation of George Street can achieve a world class retail and business hub if it corresponds with high quality urban design based on City of Sydney standards including granite paving, upgraded lighting and public domain furniture.

It is essential that the design of the CSELR does not preclude future extension of the boulevard beyond Hunter and Bathurst streets given full pedestrianisation of George Street could become desirable in the future as the city grows.

I share opposition to proposals to allow some through-traffic such as taxis and hire cars in the pedestrian area, which could create safety risks. However when light rail services are not operating late at night, access could be provided to taxis if it is shown that risks are negligible.

Light Rail Extension to Barangaroo/Walsh Bay

The Barangaroo development is part of Sydney's future as a globally competitive and environmentally sustainable city. It is Sydney's largest redevelopment project this century and when complete is expected to attract more than 23,000 people to live and work and another 33,000 visitors each day.

While the option to extend light rail to Barangaroo is not proposed at present, the potential to service the site must be retained to ensure it remains sustainable into the future, particularly if other transport options reach capacity.

Walsh Bay is a rapidly expanding precinct, with about 400 residential units and 60 businesses and arts/cultural enterprises employing some 2,500 people and attracting thousands of visitors.

Residents, workers and visitors all require transport, but this precinct lacks public transport. The lack of bus services makes access difficult for workers, patrons and customers, encouraging people to drive and adding to parking and traffic congestion. Workers have little choice other than driving to Walsh Bay and competing to find parking spaces or paying for expensive private parking.

Light rail provides an opportunity to bring much needed mass transport to Walsh Bay and Barangaroo and the CSELR project should not preclude future expansions to the precinct.

Wire Free

Low speeds proposed within the pedestrianised parts of George Street allow the CSELR to exclude wires. This should be a condition of consent to ensure the success of the boulevard which requires design excellence and amenity protection.

I share community calls that the proposed light rail use wire free infrastructure along Devonshire Street and in Moore Park. Transport for NSW states that the topography on Devonshire Street and the required speeds along Moore Park prevent wire free services from being feasible.

Given there is strong community support for wire free and concern about visual pollution, Transport for NSW should be required to prove that technology for wire free at proposed speeds and topography is not available. It should also consider wire free in parts to protect existing trees.

Pocket Parks at Road Closures - Surry Hills

The EIS proposes to close Buckingham, Holt, Clisdell, Waterloo and High Holborn streets at Devonshire Street to through traffic.

These closures must provide high quality plazas and pocket parks at intersections to help green and pedestrianise the area and add to the village atmosphere.

Public Park at Olivia Gardens - Surry Hills

The light rail service is proposed to travel through Wimbo Park, a small Surry Hills park used by local residents and then through the Olivia Gardens apartment building.

The project should include a new park for Surry Hills on the current Olivia Gardens site as compensation for the loss of Wimbo Park. The park could be managed by the City of Sydney for the benefit of local residents and add needed open space for the Bourke Street Primary School. This would require track alignment through the centre of the Olivia Gardens site.

Minimise Above-Ground Infrastructure

The EIS states that some power supply infrastructure and substations will be located above, and others below, ground.

It is essential that above ground infrastructure be kept to an absolute minimum across the route. Conditions of consent should require the location of all substations and power supply infrastructure underground where possible, particularly at Moore Park, Ward Park and Martin Place where potential visual impact and pedestrian obstructions of above ground infrastructure would be detrimental to the public domain.

Eastern Distributor Bridge

The proposed light rail crosses South Dowling Street at level and then above the Eastern Distributor via a bridge structure.

Pedestrians and cyclists must also be able to safely cross at this point, including on the bridge structure.

Loss of On-Street Parking - Surry Hills

The EIS proposes to remove 128 car parking spaces in Surry Hills to provide space for light rail to travel in both directions. Local residents consistently tell me parking in Surry Hills is already difficult and that parking close to home is almost impossible.

Transport for NSW proposes to explore opportunities for new car parking spaces adjacent Devonshire Street. This will be a challenging task in this densely populated area and the

community retains serious concerns about loss of parking as a result of the project. It is vital that new spaces do not come at the expense of existing or proposed open space.

Bourke Street Primary School Impacts

The proposed CSELR project involves extensive construction adjacent to the Bourke Street primary school and I share concerns over how this project will impact on students' learning and health outcomes.

Demolition of the Olivia Gardens apartment block will create significant noise impacts over a long period of time. Other works include jackhammering to prepare for light rail tracks through the site.

It is absolutely essential that all possible noise mitigation measures are employed to protect students from impacts. Noise barriers should be erected around the site, the school should be offered window glazing, and Transport for NSW should work closely with the school to determine when the noisiest works occur and when respite is needed.

The school currently uses the Centennial Parklands for outdoor space and will need to continue using them as it grows. I share concerns that students will have to travel further along South Dowling Street to access a safe crossing to get to the parklands as a result of the proposed project.

There is also concern that a reduction in local parking spaces will prevent parents who drive their children to school being able to safely drop them off. Transport for NSW must work with the school when it considers new parking opportunities for the area.

Ward Park - Construction

Ward Park is the site of a primary construction compound which will include a built structure with office, toilets, first aid room, security and laydown. Ward Park is heavily used by local residents and workers, throughout the day. People exercise their dogs, eat their lunch, picnic with friends, sunbathe and spend time with families there making it an inappropriate site for a compound.

All or part of this compound could go on Malborough Street to reduce impacts and this should be a condition of consent.

Cyclist Impacts - Surry Hills

Devonshire Street is an existing bike route connecting cyclists to the eastern suburbs. It provides a direct channel with lights to help cross busy Crown Street.

The proposed CSELR on Devonshire Street will remove the bicycle lane and provide for east bound traffic only, and the EIS suggests road surface changes to discourage cyclists from using Devonshire Street so that cyclists use alternative routes, suggesting Randle, Cooper and Arthur streets.

I oppose surface changes to discourage bicycle use on Devonshire Street. Bicycles are a legitimate form of transport that help reduce greenhouse gas emissions, pollution, traffic congestion and lifestyle related health conditions like diabetes. Bicycles should not be prevented from using the easiest route available, particularly given the suggested route is difficult to navigate.

Randle, Cooper and Arthur streets do not provide a straight path for cyclists, with disconnections at the intersections of Randle Street and Cooper Street, Cooper Street and Arthur Street, and all intersections along Arthur Street. Cooper Street is significantly steeper than Devonshire Street and difficult to ride up heading east. Not only does the intersection of Arthur Street and Crown Street not line up, it is not signalised, making it difficult for cyclists to cross Crown Street.

Transport for NSW should be required to introduce road configurations in consultation with the City of Sydney to make cycling on Randle, Cooper and Arthur streets safer and easier.

I understand that City of Sydney is negotiating the construction of southern separated cycleway on Chalmers Street that would connect cyclists from southern areas to the planned Castlereagh Street separated cycleway. The configuration of Chalmers Street for the CSELR must be designed to allow the planned separated cycleway on Chalmers Street.

Light Rail Operations

The success of the proposed CSELR will require accessibility for all public transport users, transferability with other services, and real time information.

All stations and carriages should be accessible to people on wheelchairs and parents with prams. Cyclists should be able to travel on board with their bicycles. The School Transport Subsidy Scheme should apply to light rail so that students can travel. People should be able to travel throughout the network with companion animals so that they can visit friends, parks, the growing number of pet friendly workplaces and retail outlets, and get to the vet. Carriages must be fitted with technology to ensure real time data is available and patrons can access wifi on board. These should all form part of the conditions of consent.

Demolition of Olivia Gardens Homes

I understand that Transport for NSW is negotiating with owners and occupiers over the loss of their homes.

It is essential that payments cover all costs associated with moving home including purchase, tax, fees, fees for sellers agents, removalists, legal costs and travel to and from inspections. Compensation should be adequate to ensure owners and tenants can find a new home in their neighbourhood.

The Government must expedite this process so that Olivia Gardens residents can make decisions about their future.

Yours sincerely

Alex Greenwich

Member for Sydney

Copy: Minister for Planning and Infrastructure