

11 December 2013

Sam Haddad
Director General & Chair
Department of Planning and Infrastructure
22-33 Bridge Street
Sydney NSW 2000

RECEIVED
13 DEC 2013
Director-General

Dear Mr Haddad 

Re: CBD and South East Light Rail Environmental Impact Assessment Public Exhibition

The Tourism & Transport Forum (TTF) welcomes the opportunity to provide a submission on the CBD and South East Light Rail Environmental Impact Statement (EIS). TTF is the national peak advocacy body for the transport, tourism and aviation sectors. It is a CEO forum representing the interests of 200 leading institutions in the private and public sectors.

TTF commented in detail on this proposal in its submission on the Sydney City Centre Access Strategy and a copy is attached. TTF would like the issues raised in that submission considered by the Department of Planning and Infrastructure (the Department) in its consideration of the EIS.

The NSW government is to be commended for committing to the \$1.6 billion CBD and South East Light Rail project. The CBD and inner Sydney public transport network is under pressure and will need to be expanded if public transport mode share targets are to be met and congestion reduced.

In assessing the CBD and South East Light Rail EIS, it is important to recognise the improved customer experience and operational benefits to the transport network that light rail will deliver. In addition, TTF encourages the Department to consider the wider benefits of light rail. These wider benefits include but are not limited to:

- Enhanced amenity for daily users of the CBD (workers, residents and visitors alike);
- Improved access to key tourist destinations (e.g. Circular Quay and the mid-town precinct);
- Improved access to major events (within the CBD but also at the Moore Park precinct and Royal Randwick Racecourse);
- New urban renewal and densification opportunities in eastern Sydney (Kingsford, Maroubra); and
- Improved access to key services (education and hospital precincts).

The purpose of this letter is to highlight TTF members' support for the project and identify a number of opportunities and challenges that need to be assessed by the Department.

The role of light rail in responding to future transport demand

The proposed CBD and South East Light Rail project has the potential to unlock constraints currently capping the capacity, reliability and attractiveness of the inner Sydney public transport network. As the economic, social and cultural heart of Sydney, it is critical that transport links to and within the CBD can meet existing and future demand. Around 630,000 passenger trips are made into the CBD each weekday and demand is expected to grow steadily, in line with employment and residential growth forecasts. In addition, the rising cost of congestion, expected to grow from \$5 billion to \$8 billion by 2020, is a further rationale to increase public transport mode shares. Transport for NSW analysis indicates that, without light rail, a 30 per cent increase in buses would be required to cope with the additional demand, worsening existing bus congestion and reliability. More buses will not solve Sydney's transport challenges. While a wide range of measures is required to achieve a significant shift to public transport, the introduction of light rail is one of the key enablers to reshape and enhance public transport services to, from and within Sydney CBD.

Transport for NSW has recently released its Sydney City Centre Access Strategy, which includes a much needed redesign of the bus network. Existing bus congestion is a direct consequence of the radial nature of Sydney's bus network. The majority of bus services converge on the CBD, resulting in regular congestion on the CBD's north-south corridors, especially George Street. The principles outlined in the strategy are consistent with international best practice. The through-routing of buses and the termination of services at the edge of the city, with passengers transferring from one service to another, will help reduce bus congestion and increase the capacity and legibility of the network. However, a frequent and reliable service with enough capacity to take on passengers alighting from terminating buses at key interchanges is required.

Light rail provides this opportunity. With a capacity of up to 9000 people per hour in each direction, light rail can accommodate as many passengers as five standard buses.

It is critical to understand that the proposed light rail route is not just an additional service between the CBD and the south east. The proposal is the enabler to redesign the entire bus network, build extra capacity and improve public transport services for the whole of the inner Sydney area.

Although the light rail project is a good first step, TTF would like to highlight the need for a medium and long-term vision of the on-street public transport network, including both light rail and bus services.

With the introduction of light rail, Elizabeth Street will be the only major north-south bus corridor in the CBD. Bus volumes on this corridor will grow in line with the substantial employment and residential growth forecast for the CBD and inner Sydney. As bus patronage grows, the pressure on Elizabeth Street will increase. TTF notes that the completion of the North West Rail Link and, in the medium to longer term, the second harbour rail crossing will allow additional bus services currently entering the CBD to be removed. However, the Sydney City Centre Access Strategy does not provide information on the ability of buses to deliver enough capacity before the completion of longer-term public transport infrastructure projects, especially the second harbour rail crossing. The light rail project and CBD bus plan are inter-dependent. The Department should consider this issue and

request evidence from Transport for NSW that the bus network will be able to cope with growth until the completion of major rail network upgrades.

Unlocking the potential of the CBD as a key visitor destination

In addition to commuter benefits, the proposed light rail will dramatically improve the visitor experience. Tourism forms an important part of Sydney's economy. On any one night there are around 27,500 visitors staying in the City of Sydney Local Government Area (LGA) and annual guest nights are just over 10 million. It is estimated these visitors delivered a direct spend into the City of Sydney LGA of over \$5 billion per annum.

Light rail will provide legible, frequent and reliable journeys between the two main visitor gateways to the city centre, Circular Quay and Central Station. The current bus network in the CBD can be challenging to understand for occasional users while the underground rail services are not ideal for visitors wishing to explore the city. Light rail offers the best of both modes, a highly legible and comfortable surface service with frequent stops providing access to Sydney's most iconic buildings.

The pedestrianisation of George Street will also provide the opportunity to create a retail boulevard destination worthy of a global city. Existing bus and traffic congestion is constraining the potential of George Street as a key visitor destination. The tourism, retail and property industries are supportive of the project and TTF encourages the Department to consider the economic benefits resulting from George Street's uplift.

Circular Quay transformation

Circular Quay is one of the most important precincts in Australia. As the centre of the cultural ribbon that stretches from Walsh Bay to the Royal Botanic Gardens via the Rocks and the Sydney Opera House, Circular Quay is heavily frequented by both visitors and locals. The existing public transport infrastructure, including the train station, ferry wharves and bus stops, make it a major gateway to the CBD for both commuters and visitors. Unfortunately, the EIS provides limited information about changes that will occur in the precinct, despite its role as a public transport hub and a gateway to Sydney, and the significant property developments planned in the area. The EIS largely focuses on the traffic impacts of the proposal but does not discuss how the project will affect the functions and amenity of Circular Quay.

Light rail infrastructure at Circular Quay must be carefully designed to minimise its impact on pedestrian movements. It should provide a seamless interchange between light rail, heavy rail and ferry services. Light rail tracks, platforms and stationary vehicles at what will be the northern terminus could obstruct desired lines of pedestrian movements if not planned carefully. The design of the light rail terminus should balance the needs of efficient interchange, pedestrian permeability and preservation of the precinct's aesthetic values

In addition to the precinct amenity and public transport functions, TTF recommends the Department investigate the impacts of the project on taxi and coach operations. Circular Quay is a strategic location for taxi and coach operators servicing the thousands of visitors accessing the precinct. While the EIS and the Sydney City Centre Access Strategy discuss the relocation of taxi zones and the

development of a taxi strategy, it seems little has been done in terms of coach management in the CBD and especially at Circular Quay.

Maintaining property access

As with all major transport infrastructure projects, the proposed light rail line will affect a wide range of users, residents and businesses during both construction and operation stages. These concerns must be assessed carefully and balanced with the overall benefits of the project. The vehicular and pedestrian access to a number of commercial buildings will be affected by the introduction of light rail and the pedestrianisation of George Street, both during construction and operational stages. The Department must ensure Transport for NSW has appropriately consulted business operators, property owners, and property developers in order to minimise impediments to their assets.

In some cases, the long-term viability of valuable businesses along the light rail corridor may be threatened. This is particularly relevant to the tourism accommodation sector where servicing and customer access to a property may be impeded.

Some key providers of the tourism accommodation sector are located along the light rail corridor. These include the Four Seasons, the Hilton, QT Hotel and YHA Central. All three are affected to varying degrees, although YHA Central is probably the most adversely affected by the light rail project.

The current proposal includes the closure of Rawson Place to traffic to make way for the main bus/light rail interchange at the southern end of the CBD. The closure of Rawson Place involves the removal of the existing kerbside lane currently used as a pick-up/drop-off area for the numerous coaches and taxis servicing the 556-bed youth hostel. If no alternative is available, viable mitigation measures must be developed to overcome this impediment to YHA Central's daily operations. Unfortunately, the EIS lacks details about what can be done to maintain reasonable access to existing businesses on Rawson Place. Potential measures could include the implementation of additional coach and taxi bays in convenient locations, wayfinding for Rawson Place businesses, and decluttering of footpaths to facilitate movements of customers with luggage. TTF recommends the Department request that Transport for NSW provide evidence that alternative options have been investigated and develop viable mitigation measures with existing businesses affected by the closure of Rawson Place.

Construction period

Transport for NSW is expecting to launch the CBD and South East Light Rail services in 2019-2020. With early works starting in 2014, five to six years of work are being scheduled on the street network. The construction stage of the project will without doubt be the most challenging. Vehicular and pedestrian access will be most impeded during that phase due to compound sites and extra lanes of traffic being closed for construction site access. Traffic and public transport services will also be delayed due to George Street being inaccessible for buses and no alternatives to replace these services. Reducing the construction period to a minimum will be critical to keep the city moving and minimise the risk for businesses to shut down.

TTF supports Transport for NSW's approach to start track construction only once a substantial part of the alignment has been established (i.e. underground facilities replaced or relocated). This will minimise the risk of delays due to unexpected or mis-mapped underground infrastructure. TTF encourages the Department and Transport for NSW to explore ways to both further reduce the risk of delays and accelerate the delivery of the project.

TTF notes that while the construction stages of the light rail project will have a significant impact on traffic congestion, traffic modelling forecasts a decrease in congestion and delays at most intersections in the CBD once the light rail is operational (compared to a scenario in which the proposal is not implemented). Short-term negative impacts should not prevent the completion of a project delivering substantial medium and long-term benefits.

If you wish to further discuss any of the above, please contact Trent Zimmerman, Deputy Chief Executive Officer and Director, Transport Policy on 9240 2047 or email (tzimmerman@ttf.org.au).

Yours sincerely

A handwritten signature in black ink, consisting of a large, stylized 'K' followed by a horizontal line that tapers off to the right.

Ken Morrison
Chief Executive Officer