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Dear Ingrid

### **City of Sydney response to the Submissions Report (SSI 6042) for the CSELR**

Thank you for the opportunity to comment on the CBD and South East Light Rail Project Submissions Report (incorporating the Preferred Infrastructure Report (PIR)) for the CSELR project.

The City supports the proposed CSELR project, with the key outstanding issues of most concern to the City detailed below. In general these concerns relate to design aspects of the project and compliance with the Development Agreement between TfNSW and the City. Specifically, the two major issues of concern to the City are:

- the ability to meet and work with the contractor's design teams on critical City urban domain design, and
- the design resolution for a separated cycleway in Chalmers Street.

The majority of issues raised by the City's resident community relate to the route through Surry Hills and the range of perceived adverse impacts on the area; addressing these apprehensions in the Conditions of Consent will assist in alleviating the community's concerns.

### **Proposed design changes in the PIR**

Since the exhibition of the EIS, a total of thirteen design changes have been made to the proposal, nine of which affect the City:

No.	Design change	City's response
1	Change in the extent of the original proposal for wire-free operation by removing the wire-free running between	The wire-free zone will be in accordance with the City's requirement from Town Hall to Wynyard; the pedestrianised zone of George

	Circular Quay and Wynyard.	Street.
2	Change in the Chinatown stop from a side platform arrangement to a central platform to avoid the potential for overcrowding during morning peak hours.	The change in the Chinatown Stop arrangement to a central platform does not contravene any requirements in the City's Development Agreement with TfNSW.
3	Amendments to the layout of the Chalmers Street stop, including provision of a shared zone to allow for cyclists, pedestrians and restricted delivery vehicles. General traffic is to be re-routed to Randle Street and Elizabeth Street.	<p>The removal of the existing traffic lanes and special event track and platform is supported. However, the City's Development Agreement with TfNSW requires a design for a future <u>dedicated</u> cycleway connecting the northern end of Prince Alfred Park with the southern end of Castlereagh Street.</p> <p>Accordingly, the City does <u>not</u> support the amended proposal, and would prefer a two-way, dedicated cycleway, and a service and property access lane (which could be a shared zone).</p> <p>The City has not seen a final drawing of the proposal as described above, nor been able to interrogate the traffic modelling associated with this proposal.</p>
4	Change to the Surry Hills (Ward Park) stop from an island platform to side platforms.	This change accords with the City's request for a better connection to Ward Park.
5	Addition of replacement parking for the Langton Clinic along the northern boundary of the new Olivia Gardens park.	The City has discussed this with the TfNSW light rail design group and the design will be further reviewed to improve the quality of the park.
6	Change to the alignment in Moore Park by moving the stop about 250 metres south to reduce the impact on the AFL training ground and improve access to Sydney Boys and Sydney Girls High Schools.	Relocation of the Moore Park stop as described is acceptable to the City.
7	Addition of a pedestrian bridge over Anzac Parade at the Moore Park stop in response to requests from the two high schools for safe access for the students.	The City supports the concept of bridge access to the two high schools.
8	Changes to the proposed locations of substations at Parker Lane, Haymarket, Chalmers Street and Surry Hills. The Haymarket substation is proposed to be located in a carpark adjacent to the lane instead of in the lane itself; the Chalmers Street substation will be located in State Rail land behind the Ibero American Plaza, and the Surry Hills substation will be located in the Olivia Gardens area, instead of Ward Park.	The City's Development Agreement with TfNSW requires that the traction power substations installed or constructed for the project in the City road ways or on land owned or controlled by the City, will be underground (ie in Olivia Gardens).
9	Changes to the locations and extent of construction compounds, including new compounds at Bond and Barrack Streets and revised compounds at Ward Park (reduced) and Moore Park, (expanded).	These changes are supported.

In addition, the City requests the provision of an additional light rail stop in Surry Hills, to the east of Bourke Street in Wimbo Park. The densely populated, and growing, areas to the south of Devonshire Street are currently not adequately served by quality public transport.

Residential development along South Dowling Street has been progressing for several years and the Danks Street precinct now generates a population approaching 7,000 people. The adjoining Lachlan precinct is planned to deliver a further 3,400 dwellings with a population in excess of 6,000 people. The current bus service through this area of Sydney is not adequate to cater for the existing demand and this situation will only worsen over the next few years. The City considers that an additional light rail stop in Surry Hills will help to address this long term public transport problem.

### **General Comment**

The detailed response provided by TfNSW (Appendix C Table C.1 of the Submissions Report) states that many of the issues raised in the City's EIS response have been addressed in the Development Agreement; however the City's EIS response raised matters that were not covered in the Development Agreement.

The remaining outstanding issues are as follows; note that the numbers refer to the Item No. in Appendix C, Table C.1, of the Submissions Report.

### **Greater level of collaboration required with City**

The City is not satisfied with the response to this issue and would like to have a greater level of consultation enshrined in the Conditions of Consent.

<b>5.1 Consultation with the City</b> <b>5.4.2 Stops</b> <b>5.6.2 Design and location of new trees</b>	The response that the City will be offered a position on the Urban Domain Reference Group is <u>not</u> satisfactory. The City will expect direct consultation with the relevant design experts on all matters pertaining to urban design, in-ground services, traffic management, sustainability and construction staging and methodology.
<b>5.2 Moore Park Tunnel</b>	The City is concerned about the design of the Moore Park tunnel portals and will expect detailed consultation on the level of intrusion into the park and the physical appearance and safety aspects of the portals.
<b>5.4.1 Light Rail Architecture</b> <b>6.2 Heritage Impact</b>	Resolution of the Rawson Place and Chalmers Street interchanges is noted as a priority; however the comment concerning membership of the Urban Domain Reference Group is <u>not</u> satisfactory. As above, the City will expect direct consultation with the relevant design teams.

### **City requires certainty**

This includes issues of detail not known at the time of preparation of the Development Agreement where the City requires certainty as to the outcome:

<b>1.2.1.1 Olivia gardens Alignment</b>	Resolution of the alignment is critical to determining the final design of the park. The local community will be consulted for their views on the park and this will require the involvement of
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	the PPP contractor's design team. As stated, the City will complete construction of the agreed design on completion of the light rail works.
<b>1.2.3 George Street pedestrianised area</b>	Vehicular access in the pedestrian zone when the light rail is operational will be restricted to essential services, including deliveries and residents. It is not proposed that pedestrians be required to mix with taxis and hire cars; the level of risk is unacceptable. The City would like to see this principle enshrined in the Conditions of Consent.
<b>4.4.1 Light Rail capacity</b>	The future-proofing proposal to provide for longer light rail vehicles and stops has not been discussed with, or agreed to by, the City. A further round of discussion is required to assess the impact of this proposal on the public domain.
<b>4.4.1 Light Rail capacity – second stop</b>	Regardless of the response, the City requests that the Operator, when appointed, be asked to review this proposal and consider the commercial and operational aspects before making a final decision.
<b>5.3.2b Barrier walls</b>	It is essential to achieve free north/south pedestrian flows across Devonshire St without the use of barrier walls. If safety requirements dictate pedestrian restrictions, the solution will be resolved in consultation with the City.
<b>5.6.5 &amp; 5.6.7 Stormwater Drainage</b>	The City requires access to the drainage design analysis and documentation in order to determine any downstream impacts and potential flooding issues. This may result in the need for repair or upgrading of existing infrastructure.
<b>5.9.1 &amp; 5.9.3 Noise Criteria</b>	The City restates our position that the EPA Rail Infrastructure Noise Guidelines (RING) be mandated for the project as a whole and that <u>all</u> of Devonshire Street be designated as "Sensitive Land Use".

### Issues not covered in Development Agreement

While the project agreement between the City and TfNSW has established a significant number of working arrangements and design issues, several matters have arisen since the agreement was finalised.

<b>5.5 Parks overview</b>	The level of detail of the condition assessment of the parks has not been established in the Development Agreement.
<b>5.6.3 Pavement Sub-bases</b>	The level of detail of geotechnical assessments for pavement bases and sub-base has not been clearly articulated in the Development Agreement.
<b>7.2 Underground Structures</b>	Determining the level of detail for the condition assessment of underground structures (ie, shopping arcades and access tunnels) is critical to ensure public safety.

	The City prefers that this be established in the Conditions of Consent and not left to “best practice”.
<b>7.4.4/5 Tree protection in construction compounds</b>	The City would prefer that specific recommendations for Belmore Park and Martin Place compounds be enshrined in the Conditions of Consent.

If you have any questions regarding the above please do not hesitate to contact Jennifer Faddy on 9288 5901 or [jfaddy@cityofsydney.nsw.gov.au](mailto:jfaddy@cityofsydney.nsw.gov.au)

Yours sincerely



**Terry Daly**

Executive Manager, City Transformation