

7 April 2014

The Hon Barry O'Farrell MP
Premier of New South Wales
GPO Box 5341
Sydney NSW 2001

Cc: Gladys Berejiklian, Minister for Transport
Cc: Brad Hazzard, Minister for Planning and Infrastructure
Cc: Duncan Gay, Minister for Roads and Ports

Dear Premier,

CBD and South-East Light Rail Project

The following responses apply to both Volumes 1 and 2 of the CBD and South-East Light Rail Project: EIS SUBMISSIONS REPORT dated March 2014.

The NSW Government should be applauded for this much needed strategic infrastructure project, in its entirety a highly positive investment in Sydney's transport network. However we believe several vital urban issues have been missed, or given lower priority than they deserve in formulating the concept and revision to the work. These include:

Light Rail Network Plan

- It is noted that the development of this proposal is, to the public's best knowledge, developed in isolation and not integrated as part of a wide-reaching light rail network. Should a potential network plan exist, we implore the NSW Government to release it for public comment and build on momentum generated by the Dulwich Hill extension and the SE Light Rail Project. Reference is made to "Sydney's Light Rail Future", December 2012. This report contains scant detail, making light mention of the Parramatta Road, Victoria Road, Anzac Parade to Malabar and Western Sydney light rail network. Parramatta Council has also released a very credible strategy. It is essential these elements are all drawn and then drawn together, along with all potential corridors.
- Should a preferred network plan not exist, we stress the importance of projects being developed not in isolation, but as part of a long term 50+ year integrated vision. This vision should therefore integrate as part of the NSW Government's larger transport and land-use plans, establishing a clear hierarchy of modes - with Public Mass Transit at the top of the list. Such a plan should also set out hierarchies and strategies for a range of transport modes, from heavy rail, to metros, light rail and buses.
- We suggest the above be prepared and include not only the above mentioned routes but also include as a priority Green Square, North Bondi via Oxford Street, Coogee Beach, Balmain, and including alternative routes through the City centre including but not limited to Elizabeth Street and Hickson Road/Sussex Street, as well as Castlereagh Street.

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- We also make reference to the proposals contained in the Glazebrook Plan, 2010, containing many sound strategies complementary to the this proposal.
- It is essential that the light rail network is premised on a consistent and legible, and preferably part of an integrated transport strategy for sYdney and beyond.

Capacity

- Capacity of the new line(s) - The merging of both the Randwick and Kingsford Branch at Alison Road and Anzac Parade creates a cap on both passenger capacity and frequency of services, precluding much needed future extensions to La Perouse or Coogee, along with much needed urban renewal along the Anzac Parade corridor, and eastern suburbs more generally.
- We suggest interrogation of supplementary corridors such as running the Randwick line across Anzac Parade to approach the City via Green Square and Elizabeth Street. Alternatively the Anzac Parade line could have half its services deviate along Todman Avenue to Green Square and beyond. Light Rail corridors in Elizabeth Street to the east and Sussex Street / Hickson Road to the west could pair with George Street, providing long term capacity for George Street to remain a primary spine.

Design Quality

- Design Quality of the integration and stations as the project becomes further from the city - it appears evident that the elements of the project outside the City of Sydney LGA have received far less design interrogation and integration. It is essential that the quality of the whole line, of the whole experience is developed as best urban practice giving priority to the LRT and an associated suite of improvements to surrounding public domain.
- It appears that outside of the City of Sydney LGA that business-as-usual traffic engineering practices have limited the potential for the Light Rail to transform this corridor. Private vehicle traffic appears to be weighted to the detriment of the LRT, which we believe is unacceptable (yet avoidable) - and limits the reach and effect of this project from it's outset.
- The effects on significant landscapes along the route (Anzac parade at Moore Park, The Racecourse frontages to Alison and Wansey Roads, the UNSW Anzac Parade frontage and High Cross Park, for example) seem unnecessarily heavy handed and urgently need to be revised. Further, the ability to plant new street trees seems to be curtailed, when the experience of many overseas examples shows that new planting along the corridor is one of the key linkages possible with best practice light rail projects.

The experience of the final project will make or break the image of Light Rail for Sydney. This project must be world class and far-reaching.

Cities are built for people, and not for cars. Drivers adapt, and so should it be required, private vehicles should be displaced to provide the best public transport experience.

Specific Responses

The following responses are made reference to Section 6. - Preferred Infrastructure Report:

- **Figure 6.1** - General Route Options are supported.
- **Figure 6.2a** - General alignments and stop locations supported. The collaboration with the City of Sydney at this location is noted.
- **Figure 6.2b** - General alignments and stop locations supported. Full movement options with Hay Street crossing are to Dulwich Hill line are fully supported.

It is noted that capacity constraints merging the Randwick and Kingsford branches may allow little opportunity to run vehicles from the Dulwich Hill Line to Circular Quay.

We advocate the exploration of running the Randwick branch via Green Square and Elizabeth Street, or extending the Dulwich Hill Line from Hay Street along Castlereigh Street to meet the George Street spine at Circular Quay.

We also note the changes to Chalmers Street, and stress the need to improve the crossing conditions at nearby Elizabeth Street. Currently footpath widths are narrow, and sequencing does not prioritise pedestrian movement - we believe posing significant safety risk. The extension of footpath space must be balanced with the need for Elizabeth Street to take a greater traffic role at this location (a role it had for 30+ years prior to the Eastern Suburbs Rail line opening in 1979).

- **Figure 6.2c** - We note and support the general alignments

It should be noted that one stop between Central Station and Moore Park grossly under-provides for Surry Hills. We strongly advocate a second stop associated with the reconfiguration of Wimbo park/Bourke Street.

We support the option of a tunnel under Moore Park West, and stress the need to repair the whole western edge at the time of the LRT construction. Currently there are clumsy multiple moundings along this edge which are inappropriate design elements, and should be smoothed to provide a consistent, safe edge and open identity to South Dowling Street.

- **Figure 6.2d** - We Oppose the alignments in this location for the following reasons:

The point at which the tunnel crosses Anzac Parade appears to be set on an angle which unnecessarily eliminates a significant number of mature figs. The alignment should be tested and configured to have minimal impact on these trees. A more perpendicular crossing to the north of this location would be a better solution.

We do not support the addition of the LRT route to the East of the existing bus-way. We strongly support the dual use of the bus-way for Express buses and LRT.

If separation of these elements is necessary - we advocate the moving of buses to Anzac Parade, with a reduction in private vehicle priority, and an increase in bus priority.

The addition of a foot-bridge should be undertaken as a last resort. These elements are detrimental to streets, and will be particularly damaging to the setting, view corridor and status of Anzac Parade as a memorial Avenue and primary urban boulevard. We strongly advocate the removal of the footbridge and integration of a safe and controlled crossing method at grade - as happens all over Sydney, and has currently in this location for well over a century.

The extents of ramping into Moore Park from a raised bridge is disastrous - and should be immediately deleted from any plans, noting figure 6.9.

- **Figure 6.2e** - We note and support the general alignments, with the exception of the following:

The transition from the Moore Park Precinct to the Kensington Precinct through the Dacey Avenue intersection is poor. The light rail should make an immediate entry to the median and maintain a rational and consistent alignment through the Carlton Street stop and on to Kensington and Kingsford. This is a first order issue.

Similarly, the transition through the Doncaster and Alison Road intersection must be developed as the current geometries are detrimental to several urban alignments. It is not evident if any footpath or tree zone is left at this location. This must be re-addressed.

- **Figure 6.2f** - We oppose the alignments in this location for the following reasons:

The risk to the character of Alison Road and its mature trees is a first order issue. Integration of the light rail and the possibly loss of a traffic lane should be further explored to ensure this edge is preserved and enhanced as a critical vista and interface of Randwick.

The location of Wansey Road alignment is least desirable, and should be returned to within the street reservation itself. The loss of Fig trees along the racecourse edge at this location in such numbers is highly inappropriate - given the street can accommodate LRT. It appears that a vocal minority has allowed this section of the project to become compromised. It is highly inappropriate that the integration of this significant state infrastructure project be diverted by private interest of a few houses in perceived loss of property prices and minor access privileges.

We note the omission of a stop adjacent to Prince of Wales Hospital - and consider the requirement for patients and families using the Light Rail to walk from High Cross Park to be a serious under-provision.

- **Figure 6.2g** - We make note to the above 6.2e comments and reiterate:

The consistency of the line running in the median with stops integrated to provide seamless and integrated alignment is a first order issue.

LRT and pedestrians should be given priority, with private vehicles subordinate. A high quality and generous public domain must be preserved along the length of Anzac Parade.

- **Figure 6.2h** - We note and support the general alignments, in particular:

We applaud the NSW Government for returning the UNSW station to the median, consistent with the general system and common best-practice. We take notice of unfortunate additions to adjacent bus stops, and detailed comments for this element follows below.

- **Figure 6.3** - We note the priority provided to pedestrians and LRT in Chalmers Street adjacent to Central Station and note the following first-order issues:

That the Chalmers Street North entrance to Central Station be upgraded and integrated with this proposal. Current conditions are substandard and underwhelming.

That the intersection with Foveaux and Elizabeth Street be upgraded and movements to Eddy Avenue be rationalised to allow greater footpath space for the large numbers of pedestrians currently crossing at this location. Shorter phasing sequences should also be explored to lessen the dangerous crowding currently being experienced at this location, anticipated to increase with the completion of this project.

We suggest that Foveaux Street and Eddy Avenue geometries should be refined to consider them each a separate intersection with Elizabeth street, with additional crossing points across Elizabeth Street to the north side of Eddy Avenue.

We note that 3 turning lanes are provided from Randle Street into Elizabeth Street north-bound, where only 2 lanes are shown in total.

- **Figure 6.4**

The number of Plane trees removed is substantial, but the nature of the work required in this location may justify such removal. We advocate the replanting of a character species integrated with any developed designs for this interchange to provide amenity and canopy shade / relief to the significant hard surfaces and resultant heat-island effects.

We note the potential for the Central Station (north) entry to be upgraded and the status of this important place to be heightened through the proposed plan.

- **Figure 6.5** - We support the general alignments, and note the following:

We congratulate the government for assuming the Olivia Gardens property and pursuing the on-grade solution down Devonshire Street and across South Dowling Street.

The reworking of Wimbo Park leaves huge potential to integrate a station at the western (Bourke Street) end of the block. Huge benefits for Surry Hills residents, businesses, Bourke Street Primary School and Moore Park West users should be considered, and a station added. The current distance between the Surry Hills (Ward Park) stop and Moore Park is much greater than advised for built up urban areas - and should be supplemented with a second Surry Hills Stop at this location.

A stop in Wimbo Park is highly encouraged.

- **Figures 6.6 and 6.7** - Further to the above, we reiterate the following comments:

Alignments of the proposed tunnel under Moore Park West and Anzac Parade turning south can and should be tightened to provide a minimal disturbance to the existing trees on this Pre-eminent avenue.

Any station at this location should be integrated with an on-grade solution, as happens currently and is best suited to this street-based transport mode. Grade separated crossings, stairs and ramps should be avoided.

The existing bus-way and new light rail alignment should be integrated to allow express bus and LRT vehicle use. If not possible, buses should be returned to Anzac Parade. The intrusion of the LRT into the edge of Moore Park is inappropriate, and should be carefully managed and minimised.

- **Figure 6.8** - As above, the alignment east of the existing bus way is not supported:

The loss of existing established succession planting by not co-locating the LRT and Bus corridor will significantly alter Anzac Parade's long term character. The significant investment in cost and upkeep of the eastern, younger row of figs should not be sacrificed for lack of appropriate infrastructure alignment and integration with the park edge.

- **Figure 6.9** - This solution is not supported on any grounds.

A grade-separated bridge, ramp and stairs will greatly add to cost as well as diminish the accessibility, character and amenity of both Moore Park and the Historically Important Anzac Parade vista. This element should be removed from the concept in it's entirety, and replaced with an integrated at grade solution. Should pedestrian and general traffic risks be deemed significant, we propose lowering of the speed limit either at event times - similar to the current school zone. These strategies should be employed and tested before the investment in an unnecessary, clutter-some piece of engineering. We

note that no new significant plantings are shown on the plan.

- **Figure 6.10** - This alignment is not supported:

The alignment of LRT on the southern edge of Alison Road appears to greatly diminish the pedestrian environment along the length of the street edge. The alignment to the north within the bus corridor/park edge should be extended to a point of transition at Darley Road. This would allow a generous station to be integrated to Centennial Park, as well as providing surveillance and activity to this much forgotten corner of the park.

Alternatively, we believe the light rail should maintain a median alignment, as generally with the system, along the length of Alison Road where it cannot be extended along the park edge as suggested above.

- **Figure 6.11** - This solution is not supported on any grounds:

The proposed alignment of the Wansey Road section of the route has greatly diminished the role and accessibility of the LRT system. As a street based system, the LRT should be integrated as part of the street, within the reserve, and without the loss of significant trees to the Racecourse edge.

The loss of substantial trees at this location is unnecessary, and should be avoided. We note that no new significant plantings are shown on the plan or section.

We note the dismissal of an option to run the line through the racecourse, due to the removal of stables. It is noted that this land is due for redevelopment. As such, the LRT should be located to adequately service this high density renewal site as well as preserve the Wansey Road figs and street character, should integration with Wansey Street not be feasible. The stop therefore in this location should be able to better serve the anticipated uplift in residents.

The compromise of the LRT system at Wansey Road is inappropriate, and appears to be a result of a vocal few, who will significantly add cost and a reduced outcome for the project and the tens of thousands of patrons who will use the new service. The alignment and quality of the LRT must be put above these issues as a first order issue.

- **Figure 6.12** - This alignment and station location is not supported:

Reference is made to the above points, and we advocate the redesign and integration of the Wansey Street stop to suit a more superior alignment. We note that no new significant plantings are shown on the plan.

- **Figure 6.13** - We support the general alignments, and note the following:

The transition east of the High Street Platform occurs too close to the intersection. We believe a superior integration of the public domain and intersection at Botany Street can occur should the platform length be kept efficient and the merging of the lines occurs so that the southern footpath may be extended for a greater length. The current arrangement which promotes walking from the Botany St Intersection for more than 60m to reach the platform to the west is inappropriate, and an additional crossing should be added to allow efficient movement from each end of the platform across High Street.

- **Figures 6.14a and 6.14b** - issues already noted.

- **Figures 6.15** - We support the general alignments, and note the following:

The design of bus stops, kerb alignments and subsequent pedestrian amenity appears to be only lightly considered. We note particular relationships to the western sides of High Cross Park along Cuthill and

Avoca streets appear substandard, and investigation should be made to maximise the park area with efficient and well integrated crossing movements.

- **Figure 6.17** - We support the general alignments, and note the following:

The reinstatement of the general median alignment at this location is applauded.

The subsequent cut-in of bus stops is though detrimental, and partly replaces the errors removed by returning the LRT to the median.

Whilst the current car-park on the western side of Anzac parade implies a generosity of space, the eventual development of this block will see substandard footpath space, potentially dangerous to the large numbers of pedestrians in this location.

The introduction of a bus cut-in south of the University mall is highly inappropriate. We advocate the removal of the right-hand turn lane to Day Street in order to preserve the alignment and provision of the kerb in a consistent manner.

We highly support the suggested mid-block crossing indicated on this plan.

We note that no new significant plantings are shown on the plan.

- **Figure 6.18** - We support the general alignments, and note the following:

A great opportunity exists to rework the public domain alignments, material qualities and street tree plantings for the length of the corridor. Whilst a number of trees are noted removed on figure 6.18, we stress the importance for a strong and identifiable public domain plan including new street trees, furniture and other essential items.

- **Figures 6.19, 6.20 and 6.21** - We support the general new locations of substations, and note the following:

Where possible the substations should be integrated into a basement or underground chamber, not visible in the public domain.

Where integration into a building is not possible (i.e) Wimbo Park, integration with Park amenities - kiosk, toilets should occur.

Site lines and identification of place should not be diminished with the placement, finishes and operation of a substation.

We submit these comments in the expectation that the design and operation of these critically important light routes can be further improved. Light Rail has a crucial role to play in Sydney's future - it is critical that it is designed and implemented to the highest possible standards.

Should you wish to discuss any of the above please call either myself or Benjamin Driver on the details below.

Sincerely,



Philip Thalys
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