

MP 10_0111



193

Ms Diane Fajmon
Department of Planning
diane.fajmon@planning.nsw.gov.au

Dear Ms Fajmon

Thank you for your letter dated 12th October, 2010 providing notification and an invitation to provide a submission regarding the exhibition of the environmental assessment for the Inner West extension of the Sydney Light Rail.

The following matters should be noted:

- *Section 10.4.3 of Volume 1 - Main Report* refers to Figures 10.2a to 10.2g. There is no Figure 10.2g in the document. It is assumed this is a typo instead of a missing figure in the report.
- *Table 3.12 of Technical paper 1* indicates that Brown Street, Hathern Street and Cook Street are Local Roads. Brown Street and Hathern Street are State Roads as is the section of Cook Street between Brown Street and Old Canterbury Road. Tebbutt Street is also a State Road between Brown Street and Parramatta Road.

It is request that the following matters be considered in the proposed Ministerial Conditions of Approval for the proposal:

1. A construction work method for raising the existing rail bridge over Parramatta Road will need to be established that maintains two-way traffic flows along Parramatta Road at all times.
2. Roads and Traffic Authority and Transport Management Centre approvals will be required for any road or lane closures proposed on State Roads or Regional Roads and also Local Roads where a closure is required within 100m of a State Road or Regional Road intersection or within 100m of a signalised intersection.
3. From a traffic flow, functionality and road safety perspective, it is preferred that the Greenway path design across Marion Street be achieved via a grade-separated facility. If the grade-separation is not possible, the preference for an at-grade signalised crossing is that it be incorporated into a signalised intersection at the intersection of Marion Street and Hawthorne Parade (north) instead of a signalised mid-block crossing, subject to Ashfield Council's concurrence and suitable design, operational, traffic modelling and local traffic management assessment being undertaken.

Roads and Traffic Authority ABN 64 480 155 255

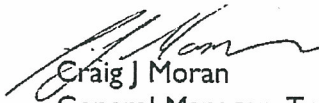
101 Miller Street North Sydney NSW 2060
Locked Bag 928 North Sydney NSW 2059 DX10516
www.rta.nsw.gov.au | 13 17 82

2.

4. The pedestrian facilities proposed at the intersection of Darley Road and Francis Street will require a suitable design, operational, demand, road safety and local traffic management assessment to be undertaken and submitted to the Roads and Traffic Authority for approval to ensure that the design satisfies road safety, demand and network impact considerations.
5. The left in/left out site compound access proposed from the City West Link will need to have a suitable geometric and safety assessment undertaken for the design to ensure that it caters for heavy vehicles decelerating into and accelerating out of the compound access point.
6. Access to inspect and maintain RTA structures adjacent to the proposed works must be established and maintained at all times during and after the completion of the project construction.

Should you require any further information relating to the RTA's submission, please contact Shane Schneider on 8588 5614 or shane_schneider@rta.nsw.gov.au

Yours sincerely

 17/11/2010.
Craig J Moran
General Manager, Traffic Management

OUR REF: 6000-01
YOUR REF: Application reference No. MP 10_0111

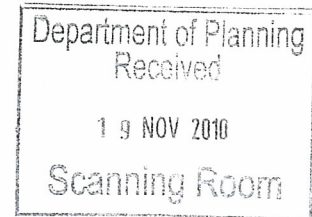


PCU016875

194

15 November 2010

Diane Fajmon
Major Projects Assessment
Department of Planning
GPO Box 39
Sydney NSW 2001



Dear Ms Fajmon

**ENVIRONMENTAL ASSESSMENT FOR
INNER WEST LIGHT RAIL EXTENSION & GREENWAY**

Council considered an officer's report entitled *Environmental Assessment for the Inner West Light Rail Extension* at its meeting on 9 November 2010 and resolved to:

- "(1) Receive and note this report;
- (2) Make a submission to the Department of Planning on the Environmental Assessment for the Inner West Light Rail Extension before the close of exhibition, that discusses the issues identified in the Discussion section of this report and any new issues that may arise;
- (3) Council submits that the Greenway cycle path will not proceed up Weston Street;
- (4) With regard to the pathway:
- Council reiterates its position that the pedestrian/cycleway should be contained within the existing corridor; and
 - The option in figure 6.33 is the preferred option.
- (5) With regard to the Dulwich Hill interchange:
- Transport connectivity should be the primary concern; and
 - Pedestrian access through Jack Shannahan Reserve should be included in any design."

The above resolution should be read in conjunction with the enclosed Council submission, which has been made in accordance with Council's second resolution above. For further enquiries please contact Kendall Banfield, Council's Transport Planner, on 9335 2179.

Yours sincerely

Marcus Rowan
Manager, Planning Services

Encl.

ENGLISH

IMPORTANT

This letter contains important information. If you do not understand it, please ask a relative or friend to translate it or come to Council and discuss the letter with Council's staff using the Telephone Interpreter Service.

GREEK

ΣΗΜΑΝΤΙΚΟ

Αυτή η επιστολή περιέχει σημαντικές πληροφορίες. Αν δεν τις καταλαβαίνετε, παρακαλείστε να ζητήσετε από ένα συγγενή ή φίλο να σας τις μεταφράσει ή να έλθετε στα γραφεία της Δημαρχίας και να συζητήσετε την επιστολή με προσωπικό της Δημαρχίας χρησιμοποιώντας την Τηλεφωνική Υπηρεσία Διερμηνέων.

PORTUGUESE

IMPORTANTE

Este carta contém informação importante. Se não o compreender peça a uma pessoa de família ou a um/a amigo/a para o traduzir ou venha até à Câmara Municipal (Council) para discutir o assunto através do Serviço de Intérpretes pelo Telefone (Telephone Interpreter Service).

ARABIC

هامة
تحتوي هذه الرسالة معلومات هامة. فإذا لم تستوعبها يرجى أن تطلبوا من أحد أقربائكم أو أصدقائكم شرحها لكم، أو تفضلوا إلى البلدية واجلبوا الرسالة معكم لكي تناقشوها مع أحد موظفي البلدية من خلال الإستعانة بخدمة الترجمة الهاتفية.

VIETNAMESE

THÔNG TIN QUAN TRỌNG

Nội dung thư này gồm có các thông tin quan trọng. Nếu đọc không hiểu, xin quý vị nhờ thân nhân hay bạn bè dịch giúp hoặc đem đến Hội đồng Thành phố để thảo luận với nhân viên qua trung gian Dịch vụ Thông dịch qua Điện thoại.

MANDARIN

重要资料

本信写有重要资料。如果不明白，请亲友为您翻译，或到市政府来，通过电话传译服务，与市政府工作人员讨论此信。

**SUBMISSION BY MARRICKVILLE COUNCIL
TO THE DEPARTMENT OF PLANNING
ON THE ENVIRONMENTAL ASSESSMENT FOR THE
INNER WEST LIGHT RAIL EXTENSION & GREENWAY**

15 November 2010

This submission responds to the public exhibition, from 13 October to 15 November 2010, by the Department of Planning of the Environmental Assessment (EA) for the Inner West Light Rail Extension and GreenWay. It expands on the 12 issues listed in the Discussion section of an officer's report to Council's 10 August 2010 Land, Assets and Corporate Committee meeting. The submission focuses on issues within the Marrickville LGA, although some consideration has been given to relevant 'cross-border' issues.

Following are the 12 issues as listed in the abovementioned Council officer's report, shown in italics, with further discussion following:

Issue 1: Council continues to support this project overall and appreciates the thorough assessment and consultation process undertaken to date by the Transport NSW project team;

For around a decade, Marrickville Council, and neighbouring Councils Leichhardt, Ashfield and Canterbury, have advocated the extension of the Inner West Light Extension and the development of the GreenWay. Over this period, the councils have supported community initiatives for bush regeneration within and around the corridor and have developed ideas for the future of the corridor. These ideas have always included light rail, a walking/cycling pathway and bush/habitat restoration. In late 2009, the councils endorsed a *Co-ordination Strategy and Masterplan* for the corridor that includes many of these ideas. Most of these initiatives have had funding support by the NSW Government through the Metropolitan Greenspace Program and Environmental Trust. It follows that the councils have been very supportive of the NSW Government's decision earlier in 2010 to build the light rail extension and GreenWay.

Marrickville Council is pleased with the planning process that has been undertaken by Transport NSW to date. All three planning stages undertaken, i.e. the Feasibility Study, Preliminary Environmental Assessment (PEA) and current Environmental Assessment (EA), have been very thorough and have taken into account the range of issues that have been raised by the community, council and other stakeholders. Council appreciates the Transport NSW project team's participation in discussions with the councils and community at all of these planning stages and through the Light Rail Steering Committee. Recent discussions of the EA within the Marrickville LGA have occurred at community sessions in October 2010, the 21 October 2010 meeting of Council's Transport Committee and the 9 November 2010 Council meeting. Reports and associated minutes of the two Council meetings are available on Council's website.

Issue 2: Council's assessment indicates that there have been no substantial changes to the design of the project within the Marrickville LGA between the PEA and EA stages. All five stations within the Marrickville LGA have been retained. The location of all stations and the alignment of the GreenWay path are also the same in the EA as were shown in the PEA.

One of the key planning issues for this project is the number and locations of light rail stops. As is indicated above, it would appear there are no changes to stop locations between the PEA and EA stages. At the PEA stage, Council expressed its general support for the location of the five stops, and this position has not altered. However, as is indicated below, Council believes further assessment is needed to determine the precise locations of the Lewisham West and Dulwich Hill Interchange stops. For the former stop, further consideration is needed of the Ecotransit idea for

a direct link between the stop and Lewisham Railway Station, and how the station will relate to the proposed Lewisham Estate and Allied Mills redevelopments. For the latter stop, further consideration is needed of the Ecotransit idea for an elongated station at Bedford Crescent and walk/cycle crossing into Jack Shanahan Park. Consideration of any further ideas raised by residents in the vicinity of Bedford Crescent is also warranted.

Council continues to advocate that stops, and access routes to stops, be carefully designed so as to minimise impacts on residents living very close to these stops. For example, the visual impact of the Waratah Mills and Dulwich Interchange stops can and should be minimised through sensitive design and landscaped screening. A resident of Bedford Crescent has recently raised a concern about the removal of part of the existing cutting to create the new Dulwich Interchange stop. This could potentially expose residents of Bedford Crescent to increased noise from the operation of the Port Botany Freight Line, which runs parallel to the Bankstown Line past Dulwich Hill Station.

Issue 3: Council agrees with findings of the EA overall, and with the environmental impact mitigation measures proposed;

In general terms, Council agrees with all of the conclusions within the EA and the associated technical reports and has not raised any serious concerns about unacceptable environmental impacts at any stage in the construction and operation of the project. Whilst some negative environmental impacts are inevitable, all are within acceptable limits and many of these will be felt at the construction stage, so will be temporary. It would appear that all post-construction or operational impacts are within acceptable limits, are localised in nature, and can be partially or wholly mitigated through careful management and design. All negative impacts should be balanced against the significant positive long-term impacts of this proposal in reducing traffic and facilitating urban renewal.

Issue 4: Council would like to see further consideration of the option of constructing the GreenWay walk/cycle path within the corridor between Waratah Mills Station and Old Canterbury Road instead of along Weston Street – as has been previously advocated by Council and Weston Street residents;

When Council considered the PEA at its 10 August 2010 meeting, it resolved to make a submission on the PEA and added a resolution that: “the submission state that Council’s preferred option is that the GreenWay remain in the existing corridor.” Whilst Council does recognise the issues involved, i.e. narrow corridor width, flooding, privacy impact, construction feasibility and construction cost, its position remains on this matter. Weston Street residents have attended recent meetings at Council in relation to the EA to discuss this matter directly with Council and the Transport NSW project team. It is apparent that most Weston Street residents continue to support the ‘within corridor’ option. At one of the meetings, residents raised the prospect of the NSW Government acquiring sections of residents’ back yards to enable the path to be constructed. If all residents were in agreement, this could be undertaken through an agreed sale rather than a forced acquisition, and it could be assumed that the modest cost of this narrow strip of land would not add significantly to the overall cost of the project.

Issue 5: Council would like to see further consideration of the Ecotransit proposal for a direct pathway link between Lewisham West light rail station and Lewisham Station (in addition to a secondary link via Hudson Street) involving a pedestrian bridge over the Longport Street and Old Canterbury Road intersection and the creation of a new entrance at the western end of Lewisham Station;

This issue has been raised in Council’s submission on the PEA and at Light Rail Steering Committee meetings. Earlier in 2010, Ecotransit submitted to Transport NSW (copy to Council) an alternative proposal for a short, direct walking link between Lewisham West stop and Dulwich Hill Station. The proposal meant that the light rail stop would be located just to the south of Longport Street so as to minimise the interchange distance between light and heavy rail. The Ecotransit proposal would connect the light rail stop to a newly created western entrance to Lewisham Station via a set of ramps. Whilst Council considers this proposal has merit, it appears that Transport NSW has decided to retain the location of Lewisham West stop further to the south, close to the location

that was originally advocated by Council in its McGill Street Precinct Masterplan. It would be ideal to create two links to Lewisham Station – a short link as proposed by Ecotransit and a longer link, via Hudson and Hunter Streets, as originally proposed by Council. It is acknowledged that the Ecotransit proposal may be difficult to achieve due to the need to create a new entrance into the western end of Lewisham Station. However, it has considerable merit as such a link would be very short and direct compared to the walking route along Railway Terrace. The Railway Terrace route is also unpleasant due to heavy traffic and a narrow footway.

Development of this direct route would not preclude the development of the secondary walking route via Hudson Street, across Old Canterbury Road into Henry Street and Victoria Street to the existing entrance to Lewisham Station. This secondary route is outlined in Council's Masterplan for the McGill Street precinct, which is intended to guide the Lewisham Estate development and future development in the vicinity. The effective functioning of this route however relies on the creation of a new signalised pedestrian crossing where Hudson and Henry streets intersect with Old Canterbury Road.

Issue 6: Council reiterates the need for careful co-ordination between Transport NSW, the Department of Planning, Marrickville and Ashfield Councils and the developers of the Lewisham Estate and Allied Mills sites in relation to Lewisham West Station to ensure this station maximises opportunities created by those developments and vice-versa. Such consideration will involve development of Voluntary Planning Agreements and/or Development Contributions to assist with funding of interchange infrastructure;

Planning staff from Marrickville and Ashfield councils recently met to discuss issues and opportunities around the two major 'cross-border' development proposals that both focus on the Lewisham West light rail stop and GreenWay corridor, i.e. the Lewisham Estate development, within the Marrickville LGA, and the Allied Mills development, within the Ashfield LGA. At the meeting it was agreed that the Ecotransit proposal for a short, direct link between the Lewisham West stop and Lewisham Station had merit. Such a link could be partially or wholly funded by development contributions and/or a voluntary planning agreement for these sites, as could secondary walking/cycling links to this stop.

The Department of Planning, as consent authority for both developments, should ensure that these large and important developments take full advantage of the light rail, GreenWay and interchange between heavy and light rail - and vice-versa. The Department's consideration should take account all plans for these sites, including Council's 2009 Masterplan for the McGill Street precinct and GreenWay development principles developed in 2010 by the GreenWay Steering Committee.

Issue 7: Council would like to see further consideration of the location of Dulwich Hill Interchange Station in light of comments from local residents and the Ecotransit proposal for an elongated station design on Bedford Crescent. The Ecotransit design has the potential to achieve maximum interchange efficiency (minimum interchange distance), maximum catchment through provision of a walk/cycle crossing into Jack Shanahan Park, whilst minimising impacts on residents of Bedford Street and other surrounding streets;

Earlier in 2010, EcoTransit submitted to Transport NSW (with copy to Council) an alternative design for the Dulwich Hill interchange stop which, in Council's view, has merit and is worthy of further consideration. Instead of a double-width arrangement, it proposes a double-length arrangement that would allow this terminal station to function effectively with a minimum interchange distance, whilst reducing the extent of the cutting that is required to accommodate the station. This would enable all the existing 90-degree angle parking to be retained on Bedford Crescent and would mean the station would not be so close to dwellings on Bedford Street. A walk/cycle crossing of the light rail tracks could also be provided near the station. Sight distances are sufficient and light rail vehicle speeds would be low enough at that point to allow such a crossing to operate safely. Such a crossing would also benefit the light rail service by increasing the walking catchment to this station, whilst generally benefiting residents by improving access to Jack Shanahan Park. With permission from Ecotransit, Council has forwarded a copy of the Ecotransit proposal to residents in the vicinity of Bedford Crescent for their consideration. These residents continue to raise design options and issues that are worthy of consideration.

Issue 8: Council would like Transport NSW, RailCorp and other stakeholders involved in the implementation of this project to continue to adhere to the project objective of minimising impacts on existing bush regeneration areas at both the construction and post-construction stages;

For over a decade, Marrickville Council has been supporting the Inner West Environment Group (IWEG) and the general community to create and maintain existing bushcare sites within the corridor. Council has for the same length of time also advocated the bushcare sites be expanded along the full length of the corridor and be integrated with light rail and walking/cycling pathways as part of the broad GreenWay concept. It follows that Council supports the general intent of the EA to minimise impacts on existing sites, and to expand/improve sites and create new sites.

Council has previously accepted, and continues to accept, that implementation of the light rail and pathway elements will have some detrimental impacts on existing bushcare sites, e.g. constructing the walk/cycle path through the established bushcare site adjacent to the Waratah Mills apartment development. Although Council accepts this situation, the EA should acknowledge this impact. As is also mentioned below, the potential for this project to improve biodiversity through improved management and treatment of stormwater deserves greater emphasis in the EA.

Issue 9: Council would like to see further consideration of all issues raised by the GreenWay Steering Committee, upon which Council is represented, including the need in the immediate term for a suitable low-cost walk/cycle crossing at the Wardell Road bridge over the Cooks River. This crossing is necessary to provide a suitable link between the GreenWay path and the Cooks River Cycleway;

Council has supported previous submissions made by the GreenWay Steering Committee and is aware that the Committee will lodge a submission on the EA. Council would like to again express its support for the views of this Committee and reiterate the need to include within the scope of works for this project walk/cycle improvements to the Wardell Road bridge over the Cooks River. Such works, which would apply to the approaches to the bridge as well as the bridge itself, could be undertaken at low cost in the immediate term. These works are necessary to allow the GreenWay path to fully link the Iron Cove BayRun to the Cooks River Cycleway.

It may be worth developing an alternative (additional) GreenWay crossing of the Cooks River via Ness Avenue, Garnet Street, Tennent Parade and the existing footbridge over the Cooks River to Lang Rd, crossing Wardell Rd and connecting to Cooks River Cycleway.

Issue 10: Council would like to ensure that all components of the 'access chain' for people with mobility difficulties to and from light rail stations and light rail vehicles have been identified and suitably designed;

In general terms, the Inner West Light Rail Extension will bring large benefits to travellers that currently experience mobility difficulties on other public transport modes. Such travellers include older people, people with mobility difficulties and family groups. This provides an added imperative to ensure access issues are thoroughly identified and addressed.

In particular, all links in the access chain should be identified and addressed, particularly the non-car or active links. In this regard, Council is keen to work with Transport NSW to ensure that all key walking and cycling connections to light rail stops are identified and improved to an accessible and high quality standard. A good starting point is to identify and improve linkages from Council's existing Accessible Footpath Network and from nearby commercial centres (such as Dulwich Hill commercial centre), and other large trip generators (such as schools) to light rail stops. Council notes the EA's commitment to comply with disability access standards, such as the Disability Standards for Accessible Public Transport. Implementation may present some challenges due to lack of experience in NSW of access issues in relation to light rail. A significant access issue will be the distance and height between carriages and platforms. A significant issue for the future is the need for Easy Access upgrades of Dulwich Hill and Lewisham Railway Stations to ensure these key interchanges are fully accessible. Council is aware that recent light rail developments in London represent good practice in terms of access.

Issue 11: Council would like to ensure that the findings of the Tennyson Street subcatchment stormwater management project are adopted to promote best practice stormwater management;

Implementation of Water Sensitive Urban Design (WSUD) principles has the potential to bring a range of benefits to this project and the surrounding area. Council notes that the EA gives a commitment to good practice stormwater management. Council has previously requested that Transport NSW adopt relevant practices from its 2009 Tennyson Street Subcatchment Management Plan, which contains a collaboratively-created community vision and action plan in relation to stormwater management. The Plan proposes stormwater treatment works in and around the corridor which were developed with, and are known and supported by, local residents. An important component of the GreenWay vision is good practice stormwater management and water pollution reduction, and the Plan will make a valuable contribution to this end - particularly in the southern part of the corridor where the Plan directly applies.

Issue 12: Council would like to inform Transport NSW that relevant sections of the EA have been forwarded to specialist Marrickville Council staff and no significant issues have been raised at this stage. (All comments from specialist staff will be included in Council's submission to Transport NSW).

Comments from Council's Traffic Engineer, Community Worker Disability Services and Biodiversity Co-ordinator have been integrated into the above discussion. Council's Heritage Advisor has assessed the heritage section of the EA report and has acknowledged the stated direct impacts on two State Significant heritage and one Local Heritage Item within the Marrickville LGA. Because there are no construction details available, it is difficult to determine the precise extent of impact. However, the EA's Heritage Impact Assessment by Australian Museum Business Services is considered by Council's Heritage Advisor to be thorough, and all recommendations listed in the EA are supported.

Following are new issues that have been raised since the drafting of the issues list above:

Issue 1: Ticketing for the whole light rail system should be fully integrated with the MyZone ticketing and fare structure.

A subsidy should be paid to the light rail operator to allow the fares to be reduced so that full integration with MyZone can be achieved. Council believes such a subsidy can be justified on the basis of the broader environmental, traffic reduction and transport benefits that will flow from the project. It will also make the access service more equitable and will bring economic benefits to the light rail operation by increasing patronage.

Issue 2: Consideration should be given to future extensions to the light rail network.

Although strictly beyond the scope of the EA, it is worth identifying at this stage possible future light connections to the Inner West service. Preliminary investigation is warranted, and at the very least, the current proposal should be designed in a way that future extension options are not precluded.

In particular, extending Light Rail to CityRail stations at Ashfield and Sydenham could increase patronage significantly. Interchanges with light rail at these stations would provide anchors at significant commercial and industrial trip attractors, as well as providing interchanges for middle and outer suburb CityRail passengers. The route distance to these stations from the proposed LRT route is less than three kilometres. Capital costs are likely to be quite modest for the potential patronage and revenue.

An extension from Dulwich Hill to Sydenham could utilise roadways that previously served trams or could utilise the existing rail corridor. An interchange at Sydenham station would connect with CityRail services to/from several LGAs including Sutherland, Hurstville, Kogarah, Rockdale, Bankstown south (via East Hills) and Campbelltown, involving a catchment population exceeding 600,000. An interchange at Sydenham station would provide for cross regional travel to/from the Inner West - trips which are currently predominately car dependent. In addition, a Light Rail

Interchange at Sydenham could help to reduce the high levels of interchanging at the overcrowded Central and Town Hall stations during the peak period.

Council encourages Transport NSW to identify remaining/existing tram routes/infrastructure and other corridor opportunities for possible future light rail extensions. Council has recently placed a draft Local Environmental Plan (LEP) on public exhibition, and there is an opportunity to investigate corridor options for future light rail extensions through this process.

Issue 3: Council supports the general aims and proposed actions of the EA Parking Strategy.

Earlier in 2010, Council staff discussed parking issues with the author of the EA Parking Strategy report, and it appears that Council staff's views on this matter have been accurately recorded and developed further in the Strategy. In particular, Council agrees that kiss and ride, mobility parking and bicycle parking should be provided, but not general park and ride. With regard to bicycle parking, it is suggested that a simple design be adopted (i.e. racks in preference to lockers) in a convenient location with good surveillance and weather protection. Council is keen to work with Transport NSW on more detailed parking management measures as the project progresses.

Diane Fajmon - Sydney Light Rail Extension submission

From: "Jordana Goodman" <jordana.goodman@pdcnsw.org.au>
To: <diane.fajmon@planning.nsw.gov.au>
Date: 22/11/2010 12:14 AM
Subject: Sydney Light Rail Extension submission
Attachments: SLRE Stage 1- submission.doc

Morning Diane,

Thank you for agreeing to except a late submission from the Physical Disability Council of NSW. I had IT problems at work on Friday, so subsequently I have sent it to you from my home computer. Please find submission attached.

Regards Jordana

NSW Department of Planning
23- 33 Bridge St,
Sydney NSW 2000

Re: Sydney Light Rail Extension (SLRE) – Stage 1

The Physical Disability Council of NSW (PDCN) welcomes the opportunity to make a submission to the NSW Department of Planning as part of the planning process for the Sydney Light Rail Extension- Stage 1. The purpose of this submission is to outline six key issues necessary for the provision of accessible public transport.

In short PDCN advocates for safe, convenient access to accessible public transport that enable community participation.

1. *Disability Discrimination Act 1992*

The Environmental Assessment Plan (EAP) for stage 1 of the SLRE recognises the importance of compliance with the Disability Standards for Accessible Public Transport (2002) and the Disability Discrimination Act (1992) for transport conveyances, infrastructure and premises.¹ The EAP contains basic plans for each of the 9 stops, but at this stage of the planning process, without detailed design plans, PDCN is unable to provide specific comment regarding the accessibility of each stop.

2. *Easy Access to CityRail train stations*

The SLRE identifies the following nine stops as part of stage 1:

- Leichhardt North stop
- Hawthorne stop
- Marion stop
- Traverners Hill stop
- Lewisham West stop
- Waratah Mills stop
- Arlington stop
- Dulwich Grove stop
- Dulwich Hill Interchange stop

As part of the NSW Accessible Transport Action Plan,² the NSW government needs to provide access to all CityRail stations by 2022 as part of the Disability Standards for Accessible Public Transport (2002). The following two CityRail train stations have been identified as part of the SLRE:

- Lewisham West stop (Inner West Line)
- Dulwich Hill Interchange stop (Bankstown Line)

Currently the number of train stations along both the Inner West and Bankstown Lines that provide Easy access is very limited. Due to the close proximity of the Dulwich Hill Interchange stop to the existing Dulwich Hill train station, PDCN is concerned that this may jeopardise future plans in providing access to the Dulwich Hill train station.

3. Greenway shared pedestrian and cycle path

Whilst PDCN sees the benefits of providing dual purposes along the disused Rozelle goods line with light rail facilities and a pedestrian and cycle path, PDCN is concerned about how the safety of users of the SLRE will be ensured when crossing Greenway shared path, and who would be responsible if there was a collision. At the following stops users of the SLRE need to cross Greenway shared paths:

- Hawthorne stop
- Lewisham West stop
- Arlington stop
- Dulwich Grove stop

4. Operational considerations

To ensure safety to all passengers of the SLRE it is understood that NSW Transport will continue providing the following:

1. The vehicles would be operated by a driver with provision for an on-board attendant with customer service duties
2. Line of site driving for on street running sections and
3. In the event of a breakdown or an emergency in a tunnel, evacuation would be in line with the existing tunnel evacuation strategy.

² NSW Transport- NSW Accessible Transport Action Plan Last updated 2007

5. Track crossing

At the stops where lift or ramped access is only provided on one side of the stop, passengers using the SLRE will need to cross from one side of the stop when either boarding or departing the light rail stop. PDCN is concerned that there is a potential risk for passengers with poor mobility or poor sight who could trip in the groove between the tracks when walking over the track crossing.

6. Seating

As part of the anticipated demographic changes expected over the next twenty years, age friendly environments need to be created with infrastructure that supports and enhances their health and wellbeing. Subsequently as part of the Greenway shared path initiative, PDCN would support the inclusion of seating along the path at regular intervals.



Memorandum

To Diane Fajmon, Senior Environmental Planning Officer, Infrastructure Projects

cc.

From Vince Sicari
Manager- Heritage Branch
Phone: (02) 9873 8559 Fax: (02) 9873 8599 Email: vince.sicari@planning.nsw.gov.au

Date 19/11/2010 **File no** 10/16200 **File** B201862

Subject: Sydney Light Rail Extension – Stage 1 – Inner West Extension (MP 10_0111) Request for Comments on Environmental Assessment (Public Exhibition Version)

Background

The Director, Heritage Branch was invited to make a submission commenting on the public exhibition EA for the Sydney Light Rail Extension Project. The Heritage Branch comments are informed by a review of the EA and the Heritage Impact Assessment Technical Study.

Heritage Branch Comments

The EA provides a broad assessment of potential impacts to listed heritage items from construction works rather than providing detailed heritage impact assessments for the items where “potential for adverse impacts” is identified in the EA. Given the Part 3A framework, this kind of detailed assessment can only occur prior to the construction works. While not ideal, it is imperative that detailed heritage impact assessment occurs prior to the finalisation of detailed design for the proposed works to ensure that impacts are known and managed appropriately.

It is considered that additional to the preparation of a Heritage Management Plan (HMP) and an Interpretation Strategy, some form of detailed heritage impact assessment should be undertaken to inform any final design outcomes for the affected heritage items. This is the case for items identified as requiring mitigation due to potential adverse impacts in Table 12.2 of the EA. With regards to items identified as being ‘unlikely’ to be impacted, the requirement for detailed heritage assessment should also be undertaken for such items where it is found that they will be impacted during the course of the project.

Such detailed heritage assessment should be undertaken by a suitably qualified heritage consultant and should inform the final design options.

This is also the case for mitigation of potential adverse impacts to non-indigenous/European archaeological resources. It is considered appropriate that a baseline archaeology assessment be completed prior to the commencement of excavation works to provide sensitivity mapping of areas which may contain significant Non-Indigenous archaeological deposits. A suitably qualified non-indigenous archaeologist with State-significant site experience should be on hand to identify any potential archaeological relics found in such locations.

Table 12.2 should be amended to add:

Item Name	Item Description	Proposed Works	Potential Impacts	Mitigation Required
Potential Non-Indigenous Archaeological Relics	Relics as described in Heritage Act 1977*	Excavations	Disturbance or destruction of relics	Yes

**relic means any deposit, artefact, object or material evidence that: (a) relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement, and (b) is of State or local heritage significance.*

Consequently the Statement of Commitments should be amended Table 19.1 Draft Statement of Commitments to add the above mentioned items and to include guidance that documents prepared will be submitted for the approval of the DG.

Amended Table 19.1

Outcome	Ref	Commitment/Mitigation Measures	Timing
New: Protection of Heritage Assets	16	Detailed Statements of Heritage Impact will inform final design principles for all affected heritage items. Such assessments will be undertaken by suitably qualified heritage consultants and will draw on existing Heritage Assessments and Conservation Management Plans available and NSW Heritage Council guidelines.	Prior to construction
New: Protection of Non-indigenous Archaeological Heritage	17	A baseline archaeological assessment will be prepared prior to excavation works to identify any areas of potential archaeological significance.	Prior to Excavation
New: Protection of Non-indigenous Archaeological Heritage	18	Any affected historical non-indigenous archaeological sites of Local and State significance found in areas identified as having potential archaeological significance in a baseline archaeological assessment are to be subject to professional archaeological excavation and/or recording before construction works commence.	During works
Protection of Heritage Assets	19	[Amend the provision as follows] The HMP would assess the heritage impact mitigation and management requirements in relation to <u>all affected heritage items</u> and will be informed by the detailed heritage assessments undertaken prior to the construction of works. [add the following to HMP condition] The HMP will be submitted to the DoP(Heritage Branch) for comment and for approval by the DG.	Design and Construction
Protection of Heritage Assets	20	[add the following to the Interpretation Strategy condition] The Interpretation Strategy will be submitted to the DoP(Heritage Branch) for comment and for approval by the DG.	Design

It is considered appropriate that a Statement of Commitments be included in relation to Indigenous archaeological heritage. The working for this SoC should be discussed with the DECCW's Environment Protection and Regulation Group (EPRG) who administer the relevant legislation.


The Heritage Branch provides draft Conditions of Consent at Attachment A for your consideration.

Please note that the Heritage Branch is available to assist the DoP as follows:

- Review any responses in relation to heritage issues raised during the exhibition period which require technical expertise to formulate a response.
- Provide advice to the DoP on the Heritage Management Plan and Interpretation Strategy prepared by the applicant.
- Confirm the State-significant experience status of heritage and archaeology consultants

Should you require further information, please do not hesitate to contact Alejandra Rojas on the above contact details.

Regards,

A handwritten signature in black ink, appearing to read 'V. Sicari'.

23/11/2010

Vincent Sicari

Manager

Heritage Branch

Department of Planning

Attachment A: Draft Conditions of Consent

The following conditions should be included as "Prior to the Commencement of Works":

Heritage Item Management Conditions

1. The Proponent shall prepare a Non-Indigenous Heritage Management Plan for the approval of the consent authority as part of the Construction Environmental Management Framework. That document shall include details of all procedures to be implemented during the works to manage impacts to non-Indigenous heritage items and non-indigenous archaeology. This document will be submitted for approval by the DG.
2. A specialist heritage manager or heritage consultant shall be nominated for the works. The consultant shall have appropriate qualifications and experience commensurate with the scope of the Major Project works. The name and experience of this consultant shall be submitted to the consent authority and DoP (Heritage Branch) for approval prior to commencement of works. The heritage consultant shall advise on the detail design resolution of new works, undertake on site heritage inductions, and shall inspect new works, design and installation of services (to minimise impacts on significant fabric and views) and manage the implementation of the conditions of approval for the Project.
3. All construction contractors, subcontractors and personnel are to be inducted and informed by the nominated heritage consultant prior to commencing work on site as to their obligations and requirements in relation to historical archaeological sites and 'relics' in accordance with guidelines issued by the Heritage Council of NSW.
4. All buildings, structures, landscape elements area areas identified as having moderate, high or exceptional significance to be retained are to be adequately protected during the works from potential damage. Protection systems must ensure historic fabric is not damaged or removed.
5. More detailed research and other investigations [i.e. Statements of Heritage Impact] are to be undertaken for each identified heritage item which will be negatively affected (by the proposal to address specific impacts arising from more detailed design development and to provide mitigation and management measures for those impacts. Mitigation and management measures for those impacts will be included in the HMP prepared by the applicant.
6. Photographic and archival recording of all buildings, structures, landscape elements area areas identified as having moderate, high or exceptional significance, as identified in the specialist reports prepared as part of the Environmental Assessments for the project, is to be undertaken prior to the commencement of any construction activity. Recording is to be completed in accordance with the Guidelines issued by the Heritage Council of NSW. Copies of these photographic recordings should be made available to the Heritage Office, Department of Planning, and also to the Local Studies Library and to relevant Local Councils.
7. A report by the nominated heritage consultant/s (illustrated by works' photographs) shall be submitted to the DG for approval within 6 months of the completion of the works which describes the work, any impacts/damage and corrective works carried out.

Non-Indigenous Archaeological Heritage Management Conditions

8. A baseline archaeological assessment will be prepared prior to excavation works to identify any areas of potential archaeological significance. The assessment will be undertaken by a suitably qualified archaeologist with expertise in State-significant and local heritage sites. This assessment will be submitted to the DG for approval.
9. Any affected historical archaeological sites of Local and State significance found are to be subject to professional archaeological excavation and/or recording before construction works commence. A Research Design including an Archaeological Excavation Methodology must be prepared in accordance with Heritage Council guidelines prior to excavation and submitted to the DG for approval.
10. After any archaeological works are undertaken, a copy of a final excavation report(s) shall be prepared and lodged with the Heritage Council of NSW, the Local Studies Library and relevant Local Councils. The proponent shall also be required to nominate a repository for the relics salvaged from any historical archaeological excavations. The information within the final excavation report shall be required to include the following:

- An executive summary of the archaeological programme;
- Due credit to the client paying for the excavation, on the title page;
- An accurate site location and site plan (with scale and north arrow);
- Historical research, references, and bibliography;
- Detailed information on the excavation including the aim, the context for the excavation, procedures, treatment of artefacts (cleaning, conserving, sorting, cataloguing, labelling, scale photographs and/or drawings, location of repository) and analysis of the information retrieved;
- Nominated repository for the items;
- Detailed response to research questions (at minimum those stated in the Department of Planning approved Research Design);
- Conclusions from the archaeological programme. This information must include a reassessment of the site's heritage significance, statement(s) on how archaeological investigations at this site have contributed to the community's understanding of the Site and other Comparative Site Types and recommendations for the future management of the site;
- Details of how this information about the excavations have been publicly disseminated (for example, include copies of press releases, public brochures and information signs produced to explain the archaeological significance of the sites).

Interpretation Strategy

11. An Interpretation Strategy will be prepared in accordance with Heritage Council guidelines prior to the commencement of works for approval by the consent authority. In particular this will outline how heritage significance to be lost will be interpreted within the site. This document should be prepared for the approval by the DG



City of Sydney

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24 November 2010

Our Ref: 2010/305029
File No: S053518

Major Projects Assessment
Department of Planning
GPO Box 39
Sydney NSW 2001

Dear Sir/Madam,

Sydney Light Rail Extension - Stage 1 Inner West Extension

I enclose a copy of the City of Sydney's submission to the Sydney Light Rail Extension – Stage 1 Inner West Extension.

Should you wish to speak with a Council officer about this submission, please contact Terry Lee-Williams, Manager Transport Strategy by telephone on 9265 9333 (call centre number) or by email at tleeewilliams@cityofsydney.nsw.gov.au.

Yours sincerely

A handwritten signature in blue ink, appearing to be "Garry Harding", written over a blue circular stamp.

Garry Harding
Acting Chief Executive Officer

Encl.

city of villages



Submission on:

**Sydney Light Rail Extension
Stage 1 – Inner West Extension**

Introduction

This is a submission from the City of Sydney to the Department of Planning regarding the 'Sydney Light Rail Extension.' The focus of this submission is primarily on the Greenway element which the City strongly supports and also requests a focus on maintaining biodiversity in the area.

The City supports the Greenway because of its potential to act as a key feeder route bringing riders from other parts of Sydney onto the City of Sydney's new cycle network. The City is committed to making Sydney a *Cycling City* and is investing \$76 million over four years in a 200km cycle network including 55km of separated cycleways. The aim of this investment is to "increase the number of all trips by residents by bicycle from 2% in 2004 to 5% by 2011, and to 10% by 2016" (Cycle Strategy and Action Plan 2007 – 2017).

The economic benefits of building inner Sydney cycleways are detailed in the study by AECOM

(http://www.cityofsydney.nsw.gov.au/AboutSydney/documents/ParkingAndTransport/Cycling/MediaReleases/AECOM_ReportApril2010.pdf)

Having reviewed the exhibited documentation, the City would like to raise the following issues.

1) The need for a quality piece of infrastructure

The proposed Greenway will be an important piece of permanent cycling infrastructure and will potentially serve a wide range of bicycle riders for decades to come. Accordingly, efforts at this stage must concentrate on ensuring that the final product will result in high quality infrastructure.

To achieve a quality finish, the City is of the opinion that the Greenway must be constructed at the same grade as the light rail tracks for the entirety of the route. This will provide the best outcome for bike riders (as well as for pedestrians with mobility impairments) in terms of amenity, ease of movement, and road safety.

The City is of the opinion that if all opportunities for an at-grade cycle route are not taken, the effectiveness of the entire route will be diminished and any return on investment will be significantly reduced. Engineering options for achieving an at-grade cycle route at the City West Tunnel need to be further explored.

This project is an opportunity to achieve a long term, high quality cycling facility with a high return on the whole investment.

2) Connectivity to the city centre

Bike commuters from outside the city are an important contribution to the City's target of ten per cent modal split for cycling. To facilitate this modal split, high quality cycle infrastructure connecting to the City's network must be constructed in neighbouring council areas. The Greenway provides an excellent opportunity to do this. However, the City is concerned with parts of the current route alignment.

The main concern lies with the northern alignment of the Greenway and its divergence away from the light rail corridor. After Marion Street, the rail line gently curves in a north-easterly direction to serve the stops at Hawthorne, Leichhardt North, Lilyfield and on towards the city. The Greenway however continues in a northern direction along the Hawthorne Canal to Iron Cove and bike riders wishing to access the city must transfer from here to Lilyfield Road. This makes the route incoherent, inefficient and is likely to discourage riders from using it. Furthermore, the gradient on Lilyfield Road is very steep and does not contribute to a pleasant cycling environment.

The City strongly encourages an alternative Greenway route be identified in this section – one which is more closely aligned with the light rail corridor and which offers the benefits of directness, efficiency, coherence and a favourable gradient.

3) Greenway width

The proposed Greenway will be a 'shared path' accommodating pedestrians as well as bike riders. In order to reduce conflict between the two groups, the City proposes the width of the path be maximised as much as possible, even if it results in varying widths along the route.

4) Bicycle parking

The City welcomes the intention to install bike parking at each light rail stop. The City suggest that parking be maximised, which will increase the catchment of stops and hence patronage.

5) Forecasting

The City notes that the documentation does not contain any detail on cycle patronage or forecasts into the future. This is an obvious omission and the City maintains that forecasts and targets should be established so that traffic impacts (e.g. reduced car use) can be quantified.

In the absence of forecasts, the City proposes that the City of Sydney 'Cycle Strategy and Action Plan 2007 – 2017' target of ten percent of all trips be adopted for planning purposes.

6) Biodiversity

The Greenway also provides an opportunity for biodiversity conservation and restoration with linkages to connecting green corridors within the area. It is understood that there are areas of dense, weedy and remnant vegetation along the rail corridor which provide excellent habitat particularly for native fauna such as small birds. Conservation of this existing biodiversity in the area needs to be considered as new infrastructure is built.