Attachment 7

Randwick City Council’s Submission on the CSELR Submissions Report & Preferred Infrastructure Report

(March 2014)
CBD AND SOUTH EAST LIGHT RAIL PROJECT
SUBMISSIONS REPORT & PREFERRED INFRASTRUCTURE REPORT

Randwick City Council Response
28 March 2014
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1. Executive Summary

Randwick City Council has continued to work collaboratively with the TfNSW (TfNSW) in the development of the CBD and South East Light Rail (CSELR) project. This submission on the Submissions Report and accompanying Preferred Infrastructure Report (PIR) should be considered in this same spirit of collaboration and commitment to the delivery of a new high quality light rail service for Sydney. For these reasons, the Council is disappointed with the failure of discussions at the end of 2013 over the location of the CSELR Randwick terminus at High Street. A considerable amount of time and effort was contributed by both parties and a favourable outcome seemed possible, however the PIR has failed to capitalise on these endeavours. These outcomes were also strongly supported by Health Infrastructure and the University of New South Wales (UNSW).

Randwick City Council continues to express overall support for the project. However, Council would like to raise and in some cases reiterate issues and concerns with the CSELR project as outlined in the PIR. The following are the key major issues outlined in this submission:

- The High Cross Park Interchange
- The proposed Randwick Stabling Facility
- Undergrounding of power along Anzac Parade in line with the urban design objectives of the proposal
- Detailed design associated with the Alison Road corner Wansey Road Light Rail stop
- Location and design issues associated with the High Street Light Rail stop, near to the corner with Wansey Road and Council’s preferred option being the relocation of the stop further east closer to Botany Street as well as the pedestrianisation of High Street from Wansey Road to Botany Street
- Detailed design associated with the Anzac Parade stop adjacent to UNSW to ensure it is safe and caters for the demand
- Loss of trees
- Loss of parking
- Construction issues
- Reconfiguration of bus access arrangements to Randwick Racecourse

There still remains a large body of work to be carried out during the detailed design stage, with many critical elements such as the stabling facility remaining as conceptual in nature with little information available to enable the environmental impacts to be properly and thoroughly assessed. This information is essential to determine the likely impacts and then to appropriately consider the mitigation measures available and suitable for the setting. Council considers that it is well placed to assist in this process and requests that any approval granted set out clear roles for Randwick City Council in the design refinement and approval process. This submission also contains a set of draft recommended conditions of consent to assist Planning and Infrastructure in finalising the approval.

As part of the aforementioned spirit of collaboration, Randwick City Council has prepared a detailed set of Urban Design Guidelines for the CSELR project (Randwick City Council Light Rail Urban Design Guidelines) as it applies to the Randwick local government area. These guidelines are based on existing Council policies, material palettes, technical specifications and individually address each of the LR stops and also the various individual circumstances as it passes through Randwick City. It is requested that these Urban Design Guidelines form an integral part of any CSELR consent granted to ensure Council policies and
standards are implemented at the detailed design level and also to ensure consistent and quality of design throughout the project.

Randwick City Council has worked closely with the TfNSW and will continue to do so through the detailed design and implementation stages of the CSELR project. The Urban Design Guidelines and Council’s offer to be part of the design refinement and approval process is part of Council’s commitment.

2. Introduction

This submission outlines comments on the Submissions Report and accompanying PIR. Section 3 of this submission outlines comments on the Submissions Report and Section 4 provides comment and detail on the various design changes outlined in the PIR.

Areas where additional investigations have been carried out by Council and in circumstances where it is considered that substantial areas of additional work area are still required is outlined in Section 5 of this document. This submission also provides some comment on where additional investigations have been carried out since exhibition of the original EIS.

Comment is also provided on revised mitigation measures developed since the exhibition of the EIS. Randwick City Council acknowledges the additional work carried out in this regard. However, Council has further suggestions where better environmental and social outcomes can be achieved through improved mitigation measure and these are outlined in Section 6 of this submission.

Randwick City Council has compiled a comprehensive set of recommended conditions of approval to assist Planning and Infrastructure in the final assessment and reporting process. These draft conditions have been formatted to conform to Planning and Infrastructure consent requirements and are outlined in Section 7 of this document.

3. Comments on Submissions Report
(Appendix C – Response to Government Agency and Project Partner Submissions)

Issues:
A large number of significant issues have been identified in the Submissions Report that requires further design resolution and/or investigation during the detailed design stage. This is in response to Council’s submission to the EIS made in December 2013. These key issues are listed below. Relevant responses are also included in the proposed mitigation measures outlined in section 6 of this document.

Key Points and Major Issues
Item 2.9 Kingsford interchange design
Item 2.12 Mitigation of parking impacts
Item 2.14 Impacts on traffic flows (via Network Management Plan)
Item 2.16 Mitigation of noise and vibration impacts
Item 2.18 Resolution and mitigation of tree impacts/opportunities for retention of more trees
Item 2.18 Traffic modelling and intersection performance
Items 2.19 & 3.4 Flood modelling for the proposal, including the Randwick Stabling facility site
Item 2.19 Impacts on drainage, utilities and infrastructure
Item 2.19 Urban and landscape design in general (via Urban Domain Reference Group)
Item 2.19 Mitigation of impacts to businesses during construction
Item 2.19 Design of specific elements of the proposal (including structures, buildings, and stabling facility)
Item 2.19 Relevant management plans to ensure agreed and appropriate standards are applied

Major Location Based Issues
Item 3.14 Design of LRV stabling area, including flooding, noise mitigation, visual impact, landscape and amenity
Item 3.5.2 Modelling of the pedestrian network
Item 3.5 Confirmation of footpath widths
Item 3.6 Design and visual impacts of construction compounds
Item 3.7 Design and location of substations at High Cross Park and Kingsford

Traffic Flows
Item 4.2.3 Design of the dedicated left-turn taper lane for southbound motorists at intersection of Anzac Parade and Meeks Street
Item 4.3.3 Road safety audit (including pedestrians)
Item 4.3.5 Consideration of capacity requirements for interchanges and future capacity needs
Item 4.4.2 Possible conflict between the CSELR and pedestrian networks
Item 4.4.3 Design of pedestrian and cycle paths
Item 4.4.4 Adjustment of shared path on Alison Road to the south of the shared busway/ light rail alignment
Item 4.4.6 Pedestrian and cycle safety at/around kerbside travel lanes
Item 4.5.1 Design and provision for cycle crossings and impact on cycle network generally
Item 4.5.2 Consideration of a bike/pedestrian facility to cross Wansey Road to Arthur Street
Item 4.6.3 Construction staging and options to minimise local impacts

Design and Operational Issues
Item 5.1.2 Consideration of use of multi-function poles
Item 5.1.12 Design of hoardings, fences and barriers including public art provision and project information
Item 5.1.14 Footpath restoration throughout the light rail alignment
Item 5.2.4 Possible relocation of mature trees affected by the CSELR alignment
Item 5.2.5 Opportunities for additional planting (eg: at Tay Reserve)
Item 5.2.6 Design of Wilson Place to address its historical qualities and relocation of the historic artefacts
Item 5.2.11 Landscape design and species selection, including tree replacement strategy
Item 5.5.1 Involvement of heritage specialists
Item 5.5.2 Investigations on reducing impacts on significant heritage/landscape features (eg: at racecourse)
Item 5.8.1 Development of various management plans (CEMP, Access Management, business Landowner and engagement plan)
Item 5.9 Selection of vibration-isolating track form
Item 5.11.1 Utility reference group to be established to advise on utility concerns
The matters listed above request a significant body of outstanding work, which are often critical to the success of the project. Council understands TfNSW will be in consultation with Council on these issues during the detailed design phase. The following specific comments are provided reiterating Council’s preferred design outcomes in relation to the urban design issues and the Kingsford Interchange.

**Urban design and public domain**

To achieve the overall public domain objective and supporting principles of the CSELR proposal, Council requests that the following key urban design components be appropriately managed in accordance with Randwick City Council Light Rail Urban Design Guidelines during the detailed design phase.

It is critical to ensure the integrated design, planning and layout of urban elements, landscape and infrastructure and to be mindful of the need to minimise visual clutter. This can be achieved through the undergrounding of power lines and the use of multi-function poles for the support of catenary, lighting, banners and signage etc. The undergrounding of powerlines along Anzac Parade is critical given that the commercial/retail strips of Kensington and Kingsford along Anzac Parade is a mixed residential/commercial zone accommodating a large number of residents and businesses. Through integration of these various elements it will be possible to achieve significant street tree planting in most circumstances. These urban design elements are critical to achieve a successful outcome and it is requested that they be carefully considered and investigated, including incorporation of Council’s Light Rail Urban Design Guidelines.

Council requested in its EIS submission that the design of the CSELR proposal be better integrated with the cycling network via a more holistic approach. TfNSW through their response to submissions clarified that bicycles would be allowed to be carried on the light rail vehicles. This approach is supported. Other connectivity/integration issues, such as incorporation of cycle crossing signals, minimising impacts on the cycle network and provision of bicycle parking/storage facilities, are required to be carefully addressed during the detailed design phase of the project. A recent study from the USA regarding ‘cycle transit users’ indicates significant positive benefits, and a greatly increased passenger catchment size, by designing well for easy cycle access on-board light rail vehicles and cycle storage areas at stops.

Council recommends that the CSELR design be closely coordinated with the future Randwick Urban Activation Precinct (UAP) proposal, to ensure consistencies between the two proposals in terms of delivery of infrastructure and upgrades of footpaths, streetscapes and public spaces. The CSELR design must also consider the demands of future increased population/activity generated by the UAP process.

Council and UNSW are willing to negotiate with TfNSW for the general provision and improvement of footpaths and public domain.

**Recommendation**

Council seeks to have more meaningful involvement in the detailed design of these critical aspects and is committed to work closely with TfNSW to formulate solutions and achieve better design outcomes, which align with the published CSELR objective of “Improving the overall amenity of public spaces in the CBD and suburbs to the South East”. 


It is also requested that the above issues, where relevant, be addressed in the Director General’s Assessment Report and the recommended conditions of approval.

**Kingsford Interchange**

Introduction of the Kingsford Interchange will involve loss of existing car parking spaces within the Anzac Parade median between the intersection known as the 'Nine-Ways' Intersection and Sturt Street. To address this loss of parking, TfNSW is to provide a temporary car park at the southern end of the Kingsford Interchange to the south of the existing car park which currently exists to the south of Sturt Street as per the Randwick City Council Urban Design Guidelines Volume 1, Section 3 Study Area 16 Kingsford - Anzac Parade, Parking Area South of Interchange. See also Council’s recommended condition in this regard.

Given the historic qualities of the Wilson Place at the intersection of Bunnerong Road and Anzac Parade, Council requests that the horse trough supports and historic plaque be suitably preserved or relocated in close consultation with Council during the detailed design phase of the Nine-Ways intersection.

Council is still concerned about pedestrian safety at this location and questions how pedestrians can safely access the platforms from the either side of Anzac Parade. There are also safety concerns regarding the likely behaviour of pedestrians if they are delayed, by multiple phases, as they cross the full width of Anzac Parade. This needs to be further investigated as part of the review of the overall detailed design of the Kingsford Interchange.

Council maintains its position that separating the interchange from the complex Nine-Ways intersection would be a simpler arrangement for motorists and pedestrians, which involves less loss of parking opposite the South Juniors. Council would prefer the option of extending the light rail to Maroubra Junction, or as a minimum, relocating the interchange further to the south near Botany Street. It is requested that the Kingsford Interchange be appropriately designed to allow for potential future extension of the light rail system to Maroubra Junction.

### 4. Comments on PIR

#### 1. Amendment of the light rail alignment and stations around Alison Road and Wansey Road:

**Issues - Wansey Road Light rail alignment:**
This submission reiterates the Council’s endorsed position that the light rail alignment in this location should be located within the Randwick Racecourse boundary. At a minimum, Council requests the placement of the shared pedestrian/bicycle path along the boundary of the racecourse. This arrangement would have less impact to the existing significant trees, as the height clearance for the shared path is significantly lower than the height clearance above the light rail tracks. Also, this eliminates two crossings of the light rail alignment by people walking or riding along the full length of this busy shared path (as the path remains on the ‘inside’ of the light rail alignment along the whole 1600 metre frontage of the Royal Randwick racecourse property. This proposed arrangement is identified in Randwick City Council Light Rail Urban Design Guidelines, Volume 1, Part 3
Study area 5 – Randwick, Wansey Road Midblock. The retention of one lane of kerbside parking on the eastern side of Wansey Road is supported.

Council notes that the six significant Hills Weeping Fig trees on the eastern side of Wansey Road (south of Alison Road) are to be retained, however there are concerns that the proposed provision of a short length of two-way flow for trucks and other vehicles to access Randwick Racecourse (via a proposed access driveway) could require the removal of these significant trees unless an adequate road width of three lanes is provided along this short section of Wansey Road (note that a kerbside travel lane adjacent to the kerb is not possible due to the spread of these six significant trees).

Recommendations:
Further investigation and design development is recommended to review the shared path and light rail alignment adjacent to the racecourse boundary to provide for the retention of the significant trees within Randwick Racecourse, and provision of a safe pedestrian and cycle path that connects key desire lines from the City of Sydney to UNSW and Randwick Junction.

The light rail design must retain a kerbside parking lane adjacent to George Dan reserve, and provide two-way (truck) access between the corner of Wansey Road/Alison Road and the proposed driveway access point to the Racecourse on Wansey Road.

2. **Amendment of the light rail alignment and Relocation of LR stop to Alison Road:**

   *Issues – light rail stop relocation from Wansey Road to Alison Road*: The relocation of the LR stop and the light rail realignment on Alison Road to reduce tree impact on Randwick Racecourse boundary is supported. The amendments will result in an overall reduction in tree loss in the Randwick precinct. The location also is more accessible to the community and better addresses safety and passive surveillance issues and has less impact on Wansey Road residents. This relocation is supported in principle, however Council requires a reconfiguration of the horizontal alignment of the light rail alignment so that it stays within the existing road reserve in order to avoid major impacts on existing mature trees.

Concern is raised about the safety and design of the Prince Street/Alison Road intersection, especially with regard to pedestrian movements.

Recommendations:
The horizontal alignment of the relocated Alison Road/Wansey Road stop is to be reconfigured so that it stays, as best as possible, within the existing road reserve.

Ensure that pedestrian signal facilities are provided on all 4 sides of the new signalised intersection at Alison Road/Wansey Road/Prince Street. The proposed slip lane from Prince Street to Alison Road (southbound) should not be provided (motorists turning left from Prince Street to Alison Road can do so through the signalised intersection – thus improving pedestrian safety).
Ensure the light rail alignment design for this section is to be in accordance with the Randwick City Council Light Rail Urban Design Guidelines, Volume 1 Part 3, Study Area 6 – Alison Road at Wansey Road Intersection.

3. **Light rail stop relocation from Wansey Road to High Street:**

   **Issues**
   Council’s preferred location is that High Street, from Wansey Road to Botany Street be pedestrianised and, if this is achieved, that the stop be shifted further east away from Wansey Road closer to the Botany Street intersection and moved closer to the northern kerbline of High Street. This is also supported by UNSW. The main issues of concern are:
   - Public domain quality – pedestrianisation/improvements
   - Distance/access for residents
   - Intersection performance
   - EMF impact to the Lowy Cancer Research Institute
   - Capacity of the limited sized (mid road) platform to cater for the significant volumes of students, residents and workers.
   - Future development, proposed by UNSW, of the High/Wansey/Arthur/Botany Street block and the provision of a safe interconnected campus environment (i.e. future proofing the area).

   To address the issues raised above, Council would prefer pedestrianising this area and moving the light rail stop to the east, near to the junction with Botany Street. This will improve levels of accessibility for local residents and move the stop closer to the Children’s Hospital. It is also suggested that the light rail alignment and stop be located to the northern side of the street near to the junction with Botany Street. This will improve the separation distance between the stop and the Lowy Cancer Research Institute and potentially reduce the likely EMF effects upon UNSW facilities and improve pedestrian safety and the capacity of the stop.

   **Recommendations:**
   Pedestrianise High Street between Wansey Road and Botany Street and relocate the light rail stop to the east near to the corner with Botany Street and shift the alignment of the track and stop to the northern side of High Street in accordance with the Randwick City Council Light Rail Urban Design Guidelines, Volume 1 Part 3, Study Area 4.

4. **Amendments to High Cross Park interchange**

   **Issues**
   Council retains its position that the High Cross Park interchange will poorly service the hospital precinct while a terminus in High St will achieve better social and environmental outcomes.

   Council maintains that the significance of High Cross Park should be recognised. There are a number of significant trees, including Norfolk Island pine trees, with a height of some 35 metres, which are a local landmark to the area. The Cenotaph in the Park is dedicated to the memory of those who served and died in the Great War and many other wars. This is a civic park which offers a gathering place and a spatial focus
for the important surrounding buildings in Avoca Street, Cuthill Street and Belmore Road. As the only open space adjacent to the POW Hospital, the park also serves as a place of reflection and rest for patients, their families and visitors.

The illustration of the High Cross Park LR stop and terminus is diagrammatic and in plan view only. No information is provided about the impact or design of any associated structures or buildings including substations, amenities/driver facilities, cycle lockers, etc. For example, it is noted that the bicycle storage facilities will be located to the end of the Randwick stop, however it is unclear if bicycle lockers will be provided on site. No sections or detailed drawings are provided to allow for a comprehensive assessment. Volumes of commuters and management of buses that will terminate at this new interchange is unclear.

Council considers that the concept of a “park-like” environment for High Cross Park would not be suitable if this location is approved as the final location for the interchange. This space would be transformed to an urban transport plaza and turf as a finish surface material is not suitable for high pedestrian trafficable areas which also do not comply with accessibility requirements.

Although the illustration in the PIR provides for the retention of the grassed areas in part of the park, these are mostly within the pedestrian ‘desire lines’ as people move between buses and the light rail. The heavy pedestrian usage is unlikely to allow for the survival of the grassed areas. Council presents two options should the High Cross Park terminus solution proceed.

Three additional existing trees are expected to be retained, but the report is not clear on whether any of these are significant. Council’s internal analysis of the diagram on figure 6.14(b) suggests all 7 significant trees will still be lost. This is not a major improvement and still leaves concern about the reality of these trees being able to withstand impacts of the whole park being used as a construction compound for the duration of the project.

Council considers that it is better to have a good design that can take advantage of level changes etc to separate the spaces for people and spaces for movement, with new tree planting in locations appropriate to the overall design and use of the park. Illustration included in the PIR document does not represent a detailed and considered design response.

Recommendations
Council maintains its objection to the location of the interchange at High Cross Park and reiterates its position that the Randwick alignment should terminate in High Street, west of Avoca Street, incorporating a pedestrianised plaza.

Should the interchange be approved in High Cross Park the following recommendations apply in addition to those already covered in our previous submission/attachments:

At High Cross Park:
- Approval not be granted for any buildings or structures as inadequate information is provided about the design and associated environmental impact (eg: views, heritage, access/servicing,
form/character, bulk, safety etc). Council requests that it be provided with an opportunity to comment on the detailed design resolutions provided.

- Design and upgrades to High Cross Park should be implemented in accordance with the Randwick City Council Light Rail Urban Design Guidelines provided by Council, incorporating a functional design brief incorporating:
  - public art
  - lighting
  - high quality finishes
  - design excellence
  - capacity for people gathering at the location for events (e.g. Anzac Day etc.)
  - retention of the War Memorial
  - casual/quiet sitting space away from busy circulation zones
  - relationship to surrounding heritage buildings/items
  - recognition and reinforcement of the Avoca St ridge
  - ensure no fences/barriers to prevent crossing of the park.

- Provision of bicycle lockers as part of the overall layout design and these should be incorporated into the proposed amenity building where possible, given the large footprint of bicycle lockers generally.

Should the terminus be located at High Cross Park, the following matters need to be addressed to improve connection to the hospitals:

- An additional single sided platform is to be provided in on the southern side of High Street, close to the Prince of Wales Hospital to service the hospitals precinct. The concept design of this split platform to be based upon Option 1 - Sketch Plan ’Randwick Terminus –Split Platform’ as presented by TfNSW on 30 October 2013.

- Include public domain improvements to surrounding footpaths and access to the hospital and Randwick Junction, such as the proposed pedestrianised plaza at High Street between Belmore Road and Clara Street and provision of pedestrian crossing points.

- Consideration of EMF impacts in relation to the new cancer treatment and research centre currently under construction within the hospitals’ campus, fronting High Street.

- Existing levels of access for the hospital and users of the hospitals should be maintained and improved where possible. Consideration needs to be given to access for taxis, access to hospital emergency facilities and the needs of people with mobility or sensory impairments, including children and the elderly who use the hospital facilities. The 24 hour nature of activities on the hospital site needs to be carefully considered.

5. Amendments to the UNSW stop on Anzac Parade

Issues
Council supports the relocation of the stop from the eastern side of Anzac Parade to a central median position and the lengthening of the central island pedestrian walkway/platform outside UNSW, provided that a
secondary crossing is provided to the north of the stop. This will increase accessibility to the platform and improve user safety and capacity. The central location will also bring this stop in line with all other Anzac Parade stops which are centrally located in Randwick local government area.

Council supports the increased retention of significant trees on UNSW site. However concerns are raised about the significance of new trees to be lost to make room for bus bays on the eastern side of Anzac Parade and Council reiterates its concerns about overall tree loss and impacts on character and amenity.

Council supports the retention of the right hand turn from Anzac Parade into Day Avenue (southbound) and recommends this be addressed as a condition (see Council recommended condition in Section 7).

However, Council notes that the following issues have not been adequately addressed:

- Road widening on both sides – impacts of traffic lanes closer to tree canopy– should ensure no adverse impact
- The capacity and design of the platform must remove the need for any marshalling of students
- The safety of students because of the need for marshalling. The use of marshalling of students is a sub-optimal solution. The width and length of the platform must cater for current and future demand.
- Visual impact of additional fencing and barriers needed to separate pedestrians from light rail tracks in the central island – detailed design investigations should consider alternatives and have regard to the Randwick City Council Light Rail Urban Design Guidelines.

Recommendations

- Ensure the stop design responds to the boulevard nature of Anzac Parade and does not dominate the streetscape. Recommend maintaining sight lines and avoiding need for physical barriers. If physical barriers cannot be avoided, pedestrian guardrails are to be in accordance with Randwick City Council Urban Design Guidelines Volume 1. Section 5 Materials and Furniture Palette.
- Support second signalised mid-block pedestrian crossing to the north of the stop (in line with the new east to west secondary access mall identified in the UNSW masterplan) to increase access and the effective capacity and safety of the movement of passengers to and from the light rail platform.
- Consider alternative treatments across the road at pedestrian crossing points – this is a well established technique for light rail installations to assist in pedestrian safety and quality of the public domain without being obstacles etc, as well as providing a visual cue to motorists.
- Support the undergrounding of power lines in Anzac Parade so as to achieve published CSELR objective of “Improving the overall amenity of public spaces in the CBD and suburbs to the South East”. Council views the light rail proposal as an opportunity to achieve
this objective, and if this doesn’t occur, such an opportunity may not arise for a considerable time. It is requested that a condition of consent be inserted on any consent granted that provides for the undergrounding of power lines along the length of Anzac Parade and the introduction of multi-function poles.

6. **Randwick Stabling Facility**

*Issue*
Council maintains concerns over the proposed Randwick stabling facility located to the rear of the properties fronting Doncaster Avenue. This location is burdened by susceptibility to flooding and any mitigation measures proposed are likely to have a significant and negative impact on the adjoining properties fronting Doncaster Avenue.

The heritage significance of the Doncaster Avenue properties and the Tramway Turnstiles Building require detailed consideration and assessment. The requested heritage impact assessment on the latter building still has yet to be provided. Council maintains concerns expressed previously regarding the loss of the Swab Building.

It is also noted that to overcome the flooding issue, there is a requirement to raise the floor level of the stabling facility, however the ability for light rail vehicles to transition from the Alison Road level to this higher level is not currently understood. It is also further noted that to mitigate the potential noise impacts of this facility, there could be a need to enclose the area completely. The visual impact to surrounding residents and the public domain along Alison Road will be extremely compromised.

Clarification is also required as to what level of maintenance work is to be carried out at the stabling facility. It is understood that only ‘light maintenance’ is planned to occur at the site, however it is unclear as to what activities are included in the definition of ‘light maintenance’?

*Recommendations*
Council recommends that a detailed investigation be carried out on the potential impacts of the proposed stabling facility on the Doncaster Avenue properties prior to any consent being granted. In addition to the flooding and heritage impacts as outlined above, potential noise impacts need further assessment. Council would also need to ensure that a cycle path is incorporated into any detailed design. No detailed plans of the stabling facility have been provided to allow for any detailed assessment at this stage. It is requested that Council be given the opportunity to comment on any further design development provided by the proponent and that any further analysis on flooding and noise also be provided to Council for comment.

Council considers this location unsuitable due to the impacts outlined, and it is suggested the alternative location including another area of the Randwick racecourse land adjacent to Wansey Road corner High Street be explored.

7. **Construction Issues associated and changes to the extent and location of construction compounds on Anzac Parade and High Cross Park**

*Issues*
In relation to the relocation of UNSW construction compound from the lower campus to the western side of Anzac Parade, Council supports this design change in principle, given the new location will have less impact on significant trees. Council however recommends that the extent of the construction compound area be minimised and appropriately arranged through negotiation with UNSW (e.g. possibly reposition workers’ car parking into UNSW carparks accessed from High Street). Further, noise impacts of the relocated compound on properties at the rear needs to be properly assessed.

Recommendations
A noise assessment study is required for properties surrounding the new proposed construction compound.

In order to protect the operation and amenity of the hospital, no construction zones should be established on High Street frontage of the hospitals. Existing two way entry/exit points on High Street must be maintained.

The use of High Cross Park as a construction compound needs to be cognisant of the importance of the site as a community gathering point and its regular use for events such as Anzac Day, Remembrance Day and the White Ribbon Walk. The construction compound therefore should be kept to the eastern side of the park so as to maintain public access to the War Memorial at all times.

The extent of the Anzac Parade construction compound area is to be minimised and appropriately arranged through negotiation with UNSW.

8. **Introduction of a pedestrian bridge over Anzac Parade at Moore Park:**

Issue
While not in Randwick City Council area, this proposed pedestrian bridge is relevant to the overall visual character of Anzac Parade and its important and strong boulevard qualities. This is also relevant due to Council’s resolution on the previous EIS submission in support of a pedestrian and cycle tunnel under Anzac Parade.

The potential environmental impact of an overhead bridge is significant due to the generally uniform characteristics of the Anzac Parade boulevard and its important historic connections. For these reasons, it is recommended that should the bridge concept proposal be approved, a design excellence process be implemented for this unique component of the proposal and a design competition be pursued as outlined in City of Sydney competitive design policy.

It is also important to consider the design and visual impact of this bridge proposal along with the concurrent RMS proposal for a shared pedestrian/cycle bridge at Moore Park adjacent to Gregory Ave providing links to existing paths on both sides of Anzac Parade (Review of Environmental Factors of the RMS proposal is currently on exhibition until 13 April 2014).

Recommendation
Council supports a review of the pedestrian bridge proposal by the urban domain reference group. Should the pedestrian bridge proposal be
approved, a design excellence process including a design competition should be carried out to achieve the best possible design outcome.

9. **Reconfiguration of bus access arrangements to Randwick Racecourse:**

*Issue*
A slight reconfiguration is proposed as part of the PIR at the Alison Road and Darley Road intersection, to accommodate a new eastbound, bus-only slip lane from Alison Road onto King St. As outlined in the PIR, this design change aims to remove the need for buses using the Darley Road roundabout for U-turn manoeuvre and the need for special event bus staging in Darley Road during special events.

*Recommendations*
The proposed alteration to the Alison Road/King Street intersection for the manoeuvring of buses and coaches during special events/major race days is not supported as it will create pedestrian vs. bus/coach conflicts, will introduce new bus/coach traffic to a residential street and may invite illegal manoeuvres by other motorists on any day to ‘short cut’ into King Street.

5. **Comments on the Additional Investigations/Clarification Provided**

Council supports the additional investigations and further explanation on various matters, in particular, the supplementary parking assessment undertaken to refine the Project Parking Strategy developed as part of the EIS and clarification of certain inconsistencies between the EIS and the proposed design as well as numerous editorial errors.

*Parking*

Council supports the mitigation measure proposed for replacement of all impacted special kerbside uses (e.g. mobility parking and loading zones) on a ‘like for like’ basis along the CSELR corridor. The proponent should work closely with Council to provide the replacement parking.

Regarding the loss of all of the other parking spaces along the south eastern alignments, the Council commissioned GHD report (Randwick City Council Proposed Eastern Suburbs Light Rail Project On-Street Parking Appraisal) should be examined. TfNSW would need to fund the outcomes arising from the Council’s consideration of this report.

*Car Park South of Kingsford Interchange*
Introduction of the Kingsford Interchange will involve loss of existing car parking spaces within the Anzac Parade median between the Nine-Way Intersection and Sturt Street. TfNSW is to provide a temporary car park at the southern end of the Kingsford Interchange to the south of the existing car park which currently exists to the south of Sturt Street as per the Randwick City Council Urban Design Guidelines Volume 1, Section 3 Study Area 16 Kingsford - Anzac Parade, Parking Area South of Interchange. See also Council’s recommended condition in this regard. This facility is to provide for a minimum of 250 car parking spaces.
CSEL R capacity

Council has been advised by Planning and Infrastructure that the Randwick UAP is expected to be on exhibition in April 2014. The draft Randwick UAP proposal suggests an uplift of around 7,500 dwellings, representing approximately 13,500 additional residents in the area (if based on 1.8 people per dwellings). Employment growth is also anticipated to support the ongoing operation and growth of the Randwick Education and Health Specialised Centre (i.e. 6,000 as planned in the draft Metropolitan Strategy 2031). Throughout the discussions with TfNSW, Council has been advised that the UAPs were not considered in the preparation of this proposal. It is a matter of concern how the proposal would be able to cater for the additional future growth, particularly as it is envisioned (and is Council’s preference) that the Kingsford alignment be extended to, or beyond, Maroubra Junction.

It is therefore recommended that the principle of future proofing this infrastructure be seriously taken on board. Thus the calculation of the CSEL R capacity needs to take into consideration the additional transportation needs (i.e. additional residents and workers) to be generated by the Randwick Urban Activation Precinct (UAP) proposal and future growth of the Specialised Centre. This information is essential to planning an effective light rail service and may precipitate the introduction of a 60 metre light rail vehicle from the commencement of operations.

6. Comments on the Revised Mitigation Measures

Council notes that the environmental management measures have been revised to incorporate updates and additional mitigation measures in response to the issues raised in the submissions, design changes proposed and further investigations undertaken since the exhibition of the EIS.

Council generally supports the proposed additions, in particular:

Detailed design stage

- Review of the final design of the Belmore Road and Avoca Street intersection to further reduce the queuing on Belmore Road
- Determination of the location north of UNSW where express buses rejoin the general traffic lanes during detailed design
- Traffic signals/crossings along Anzac Parade between High St and UNSW Mall to be designed to ensure the light rail vehicle will not block traffic on the side streets (i.e. High Street and Day Avenue)
- Retention of the right turn bay into Day Ave from Anzac Parade
- Preparation of an Operational Noise and Vibration review to determine the final design of mitigation measures
- Further investigation of the relocated Wansey Road stop to reduce impacts on Wansey Cottage and significant trees in the racecourse and along Wansey Road
- Specific requirements proposed for monitoring EMF and EMI at the UNSW and the hospitals precinct prior to commencement of construction, during construction and also at commencement of CSEL R operations on ongoing during the life of the project
• Development of protocols for CSELR operation and passenger safety in the event of flooding
• Qualified arboricultural review/advice to be sought during design and construction stages to identify appropriate mitigation measures for impacts on planted trees
• Enhanced stakeholder engagement strategy, including the establishment of the Local Business/Community Reference Groups, an Urban Domain Reference Group, and a Utilities Reference Group

**Construction stage**

• Clarified stakeholder engagement approaches during construction, such as place managers as a single point of contact and one to one stakeholder briefings and community info sessions when necessary
• Impact of the project on retail centres in Randwick City needs to be assessed, particularly during construction phase. Collection of sound base data is important to enable the measurement of impacts. TfNSW must be responsible for the collection of base information so that it and Council can respond to community concerns regarding the impacts of the light rail project, particularly during construction. There is a need for the preparation of Business Continuity Plans in consultation with Council and the various Chambers of Commerce.
• Construction techniques to be employed where practicable to minimise impacts to tree root zones

**Operation stage**

• CSELR alignment to be designed to not preclude the opportunity for on-street parking within the kerbside lane of the road where sufficient road space is present
• Street lighting along the route to be designed to minimise potential light spill into residential properties
• Specific parking measures to be developed together with Randwick Council (i.e. local area resident parking schemes and short-term timed parking for businesses) for replacement nearby of all impacted on-street kerbside uses along the CSELR corridor

However, the following clarification/changes are requested for better clarity and improved environmental and social outcomes:

• C.2 – Note that central pole catenary system is not to be used along Anzac Parade, as the central pole arrangement would require additional space for the poles and commensurate clearance width to light rail vehicles each side, resulting in significant reduction of footpaths widths at certain locations. Council requests the catenary poles be located on both kerb sides of Anzac Parade (from Alison Road to and including Kingsford Interchange) and be incorporated with the multi function poles along with the requested undergrounding of power lines for minimised visual clutter.
• C.13 – Note that the Randwick stabling facility should be designed in accordance with RCC design excellence guidelines and the EPA noise and vibration standards and not to cause overland flow on adjacent properties
• D.12 – Note that the war memorial at High Cross Park is to be retained and this should be kept as a separate point under D.12.
• T.3 – Request that the replacement plantings be maintained by the operator for a period of two years (instead of “a period no greater than two years” as proposed).
• Y.23 – Consider that avoiding works during rainfall is warranted to minimise vehicle disturbance to the topsoil (e.g. on the High Cross Park site). Otherwise, explanation should be provided, if this mitigation measure is to be removed.
• AB.7 – Request retention of AB.7, given that “vegetation” and “trees” refer to two different scopes. AB.7 should be kept separately from T.1, under the heading of Biodiversity.
• AH.25 - Recommend that the shared bus and light rail running lane be provided on Anzac Parade between the Kingsford Interchange and Alison Road. This shared running should also operate for the same extent in the opposite direction and be designed to the minimum width allowance to reduce any impact on footpath widths.