Bus Priority Infrastructure Program
Kingsgrove Bus Depot
(routes 412, 422, 423, 426 and 428)
Submissions report
October 2017
Bus Priority Infrastructure Program
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(routes 412, 422, 423, 426 and 428)
Submissions report
October 2017

Prepared by Hills Environmental and Roads and Maritime Services

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## Approval and authorisation

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| Accepted on behalf of Roads and Maritime NSW by | Roopa Jogunoori  
Project Manager  
Busway Program | Easing Sydney's Congestion PMO | Sydney Division |
| Signed | [Signature] |
| Dated | 26 October 2017 |

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Executive summary

The proposal

Transport for NSW, in partnership with Roads and Maritime Services (Roads and Maritime), is proposing to improve the reliability of buses by implementing a range of measures including bus lanes, bus priority at traffic lights and more efficient bus stop placement. This includes making changes to bus stops at the following locations (the proposal):

- Western section of route 412, between Camperdown and Campsie
- Southern section of route 422, between Tempe and Kogarah
- Southern section of route 423, between Enmore and Kingsgrove
- Southern section of route 426, between Enmore and Dulwich Hill
- Western section of route 428, between Enmore and Canterbury.

The main features of the proposal are:

- Reducing the number of locations at which buses need to stop by combining, removing or relocating some bus stops
- Lengthening some bus stops to improve access for buses and assist passenger boarding and alighting
- Formalising some bus stops with signage and in some cases shelters
- Reducing delays for buses by moving bus stops to the departure side of traffic lights, allowing them to take advantage of the Public Transport Information and Priority System (PTIPS).

A summary of the main features of the proposal as presented in the Bus Priority Program Kingsgrove Bus Depot (routes 412, 422, 423, 426, and 428) Review of Environmental Factors prepared by Roads and Maritime in February 2017 (the REF) is provided in the Table 1 below.

Table 1: Main features of the proposal as presented in the REF

<table>
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<td>18</td>
<td>4 (into 2)†</td>
<td>5</td>
<td>1</td>
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<tr>
<td>422</td>
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<td>-</td>
<td>1</td>
<td>1</td>
</tr>
</tbody>
</table>

Display of the REF

Roads and Maritime prepared a REF to assess the environmental impacts of the proposal. The REF was publicly displayed for 29 days between 8 February 2017 and 8 March 2017. The REF was also placed on the Roads and Maritime project website and made available for download. The website link was advertised in the following publications:

- Inner West Courier
- Canterbury Bankstown Express
- St George and Sutherland Leader.

In addition to the above public display, a community update was letterbox-dropped to residents and businesses, and additional stakeholders were sent the community update with a covering

† Removal of four bus stops, establishment of two new bus stops (with new transit stop numbers) at a new location.
email/letter. During the public display period, project team staff visited potentially affected residents, businesses and other stakeholders near bus stops with significant changes.

Issues raised

A total of 215 submissions were received in response to the display of the REF. This included submissions from two government agencies (Bayside and Inner West Councils), submissions from three members of the NSW Parliament and 210 submissions from the community. One form letter and two petitions were also received.

Of the 215 submissions received:

- 9 (about four per cent) stated support for the proposal as a whole or to individual changes associated with the affected bus stop locations
- 60 (about 28 per cent) objected to the proposal as a whole
- 11 (about five per cent) suggested scope changes to the proposal as a whole
- 20 (about ten per cent) did not state a position for or against the proposal as a whole
- 115 (about 53 percent) objected individual changes associated with the affected bus stop locations (described in Table 2 below)

A number of submissions objected to proposed changes at particular locations (a total of 134 objections)\(^2\) as shown in Table 2 below.

<table>
<thead>
<tr>
<th>Community Update location #</th>
<th>Location description</th>
<th>Objections</th>
</tr>
</thead>
<tbody>
<tr>
<td>#7</td>
<td>Salisbury Road, Camperdown</td>
<td>8</td>
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<tr>
<td>#9, #10, #11, #12, #13, #14</td>
<td>Salisbury Road, Stanmore</td>
<td>5</td>
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<tr>
<td>#15, #16</td>
<td>Douglas Street, Stanmore</td>
<td>12</td>
</tr>
<tr>
<td>#17, #18</td>
<td>Trafalgar Street, Petersham</td>
<td>2</td>
</tr>
<tr>
<td>#21</td>
<td>Livingstone Road, Marrickville</td>
<td>3</td>
</tr>
<tr>
<td>#23</td>
<td>Beauchamp Street, Marrickville</td>
<td>9</td>
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<td>#24</td>
<td>Wardell Road, Marrickville</td>
<td>4</td>
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<td>#25, #26, #27, #28, #29, #30</td>
<td>Permanent Avenue, Earlwood</td>
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<td>#31, #32</td>
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<td>8</td>
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<td>#40, #41</td>
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<td>#45</td>
<td>Bexley Road, Earlwood</td>
<td>2</td>
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<tr>
<td>#49</td>
<td>Princes Highway, Wolli Creek</td>
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<tr>
<td>#50, #51</td>
<td>West Botany Street, Arncliffe</td>
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<td>#52, #53</td>
<td>Bryant Street, Rockdale</td>
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<td>#54, #55</td>
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</tr>
<tr>
<td>#57, #58</td>
<td>Princes Highway, Rockdale</td>
<td>3</td>
</tr>
<tr>
<td>#59, #60, #61, #62, #63</td>
<td>Victoria Road, Marrickville Road and Illawarra Road, Marrickville</td>
<td>0</td>
</tr>
<tr>
<td>#68</td>
<td>William Street, Earlwood</td>
<td>10</td>
</tr>
</tbody>
</table>

\(^2\) Note that some submissions contained more than one objection.
The proposed changes at each location have been reviewed in detail following a consideration of the issues and concerns raised by the community. While some changes are now proposed (refer below), the contribution of the changes to improved bus service reliability supports proceeding with the proposal at most locations. In deciding on the final proposal, consideration was given to a range of factors including safety, pairing of bus stops, spacing of bus stops, local conditions such as terrain and footpaths and the number and type of customers using each stop.

Further information regarding the justification for the proposal is provided in section 3.1.1 while sections 3.2 to 3.31 address issues raised in relation to individual bus stop locations.

Issues raised by councils

A submission was received from Inner West Council that raised concerns about proposed changes to some individual bus stops and provided support for others (on Routes 412, 423, 426 and 428). Key concerns raised by Inner West Council included:

- Impacts on the community due to increased distances between stops
- Impact on accessibility to community facilities
- Removal of highly used stops
- Removal of advertising at bus stops affecting existing revenue arrangements.

A submission was received from Bayside Council which encouraged changes along Route 422 to provide priority for buses and sustainable transport, including planning for bicycles.

Issues raised by Members of NSW Parliament

Members of the NSW Parliament who provided submissions were concerned that the removal of bus stops would adversely impact on elderly passengers, those with a disability and parents and carers with prams. It was pointed out that the bus services were in many cases vital to community members and their removal could be the difference between some people being able to access public transport or not.

Issues raised by the community

A key issue raised in the submissions by the community related to accessibility and increased walking distance for the public, particularly vulnerable members of the community including elderly, less mobile, disabled, young families and students. Concern was raised that the removal of stops would result in people no longer being able to access public transport to get to essential services including the Royal Prince Alfred Hospital and other community facilities.

Residents whose properties would be adjacent to proposed new bus stops raised concerns regarding safety and impacts from noise and air pollution. Safety concerns for pedestrians and
traffic were raised along with the issue of security for people having to walk longer distances at night. Several submissions suggested the proposal is not consistent with encouraging the use of public transport. Increasing development in the area and the resultant potential for increased demand for bus stops was also raised.

**Proposal changes**

**Route 422 – Bus stops 221648 (#57) and 2217137 (#58)**

The proposal included removal of Route 422 bus stops 221648 (#57) and 2217137 (#58) located on the Princes Highway, Rockdale and Kogarah. Following a review of the submissions for these bus stops, it was identified that they provide an essential service for supported employees of the Intellectual Disability Foundation of St. George, and that increasing the walking distance to the next stops would impact on those with restricted mobility. Removal of these bus stops is now no longer proposed.

**Route 426 – Bus stops 220480 (#79), 220487 (#80) and 220430 (#81)**

The proposal included relocation of Route 426 bus stop 220480 (#79) about 60 metres south-east to the departure side of the Livingstone Road intersection. The proposal also included removal of Route 426 bus stops 220487 (#80) and 220430 (#81) located on Marrickville Road, near Fletcher Street and Petersham Road respectively.

Following a review of the submissions for bus stops 220487 (#80) and 220430 (#81) on Marrickville Road near Fletcher Street and Petersham Road, Marrickville, it was recognised that these bus stops should be retained given their relatively high levels of usage compared to other adjacent stops along the route and proximity to active land uses associated with the Marrickville town centre.

Without the removal of bus stop 220430 (#81), the relocation of bus stop 220480 (#79) would have resulted in unsuitable spacing (about 100 metres) and is therefore no longer proposed.

Table 3 below provides a summary of the proposal as amended.

**Table 3 Summary of the proposal as amended**

<table>
<thead>
<tr>
<th>Route</th>
<th>Bus stop removals</th>
<th>Bus stop consolidation</th>
<th>Bus zone extensions or formalisation</th>
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<td>422</td>
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<td>428</td>
<td>6</td>
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**Next steps**

The submissions report will be considered by Transport for NSW / Roads and Maritime prior to making a final decision regarding the proposal. Further consultation with local councils will occur during the implementation of the proposal, if approved.

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<sup>3</sup> Removal of four bus stops, establishment of two new bus stops (with new transit stop numbers) at a new location.
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1 Introduction and background

1.1 The proposal

Transport for NSW, in partnership with Roads and Maritime Services (Roads and Maritime), is proposing to improve the reliability of buses by implementing a range of measures including bus lanes, bus priority at traffic lights and more efficient bus stop placement along particular bus corridors that currently experience lower service reliability.

Making adjustments to the number and location of bus stops along a bus corridor is one measure that can help reduce the risk of delays to passengers. It limits the need for buses to continually pull in and out of traffic from poorly located stops where customer demand may be considerably lower compared to other nearby stops along the route or where buses may miss green traffic lights or get caught in queues behind turning cars.

For the current proposal, changes to bus stops at the following locations are planned (the proposal):

- Western section of route 412, between Camperdown and Campsie
- Southern section of route 422, between Tempe and Kogarah
- Southern section of route 423, between Enmore and Kingsgrove
- Southern section of route 426, between Enmore and Dulwich Hill
- Western section of route 428, between Enmore and Canterbury.

The main features of the proposal are:

- Reducing the number of locations at which buses need to stop by combining, removing or relocating some bus stops
- Lengthening some bus stops to improve access for buses and assist passenger boarding and alighting
- Formalising some bus stops with signage and in some cases shelters
- Reducing delays for buses by moving bus stops to the departure side of traffic lights, allowing them to take advantage of the Public Transport Information and Priority System (PTIPS).

A summary of the main features of the proposal as presented in the Bus Priority Program Kingsgrove Bus Depot (routes 412, 422, 423, 426, and 428) Review of Environmental Factors prepared by Roads and Maritime in February 2017 (the REF) is provided in Table 1-1:

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<td>428</td>
<td>6</td>
<td>-</td>
<td>1</td>
<td>1</td>
</tr>
</tbody>
</table>

Figure 1-1 shows the regional context of the proposal. Figure 1-2 to Figure 1-4 provide an overview of the proposal as presented in the REF and its key features. A more detailed description of the proposal is found in the REF.

---

4 Removal of four bus stops, establishment of two new bus stops (with new transit stop numbers) at a new location.
Following a review of the submissions received, changes to the proposal have been made. These are discussed in Chapter 5 (Changes to the proposal) and a summary table of the revised proposal per location is provided in Tables 5-1 to 5-5.

### 1.2 REF display

Roads and Maritime prepared a REF to assess the environmental impacts of the proposal. The REF was publically displayed for 29 days between 8 February 2017 and 8 March 2017. The REF was also placed on the Roads and Maritime project website and made available for download. The website link was advertised in the following publications:

- Inner West Courier
- Canterbury Bankstown Express
- St George and Sutherland Leader.

In addition to the above public display, a community update was letterbox-dropped to residents and businesses, and additional stakeholders were sent the community update with a covering email/letter. During the public display period, project team staff visited potentially affected residents, businesses and other stakeholders near bus stops with significant changes.

### 1.3 Purpose of the report

This submissions report relates to the REF and should be read in conjunction with that document. The REF was placed on public display and submissions relating to the proposal and the REF were received by Roads and Maritime. Each submission was then reviewed and the issues raised were considered. This submissions report summarises the issues raised and provides responses to each issue (Chapter 3 Response to issues - community and Chapter 4 Response to issues - council). It also describes and assesses the environmental impact of changes to the proposal (Chapter 5 Changes to the proposal) and identifies new or revised environmental management measures (Chapter 6 Environmental management).
Figure 1-1 Regional context of proposal
Figure 1-2 Proposal overview map 1
Figure 1-3 Proposal overview map 2
Figure 1-4 Proposal overview map 3
2 Summary of Issues

Roads and Maritime received 215 submissions between 8 February 2017 and 3 April 2017. Appendix A lists the respondents and each respondent’s allocated submission number. Appendix A also indicates where the issues from each community submission have been addressed in Chapter 3 (Response to issues - community) and where issues from each council submission have been addressed in Chapter 4 (Response to issues - council) of this report.

2.1 Overview of issues raised

A total of 215 submissions were received in response to the display of the REF. This included submissions from two government agencies (Bayside and Inner West Councils), submissions from three members of the NSW Parliament and 210 submissions from the community. One form letter and two petitions were also received.

Each submission has been examined individually to understand the issues being raised. The issues raised in each submission have been extracted and collated, and corresponding responses to the issues have been provided. Where similar issues have been raised in different submissions, only one response has been provided. The issues raised and Roads and Maritime response to these issues forms the basis of this chapter.

Of the 215 submissions received:

- 9 (about four per cent) stated support for the proposal as a whole or to individual changes associated with the affected bus stop locations
- 60 (about 28 per cent) objected to the proposal as a whole
- 11 (about five per cent) suggested scope changes to the proposal as whole
- 20 (about ten per cent) did not state a position for or against to the proposal as whole
- 115 (about 53 percent) objected individual changes associated with the affected bus stop locations (described in Table 2-1 below).

A number of submissions objected to proposed changes at particular locations (a total of 134 objections) as shown in Table 2-1 below.

Table 2-1 Summary of objections at specific proposal locations

<table>
<thead>
<tr>
<th>Community Update location #</th>
<th>Location description</th>
<th>Objections</th>
</tr>
</thead>
<tbody>
<tr>
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Note that some submissions contained more than one objection.
The proposed changes at each location have been reviewed in detail following a consideration of the issues and concerns raised by the community. While some changes are now proposed (refer Chapter 5 (Changes to the proposal)), the contribution of the changes to improved bus service reliability supports proceeding with the proposal at most locations. In deciding on the final proposal, consideration was given to a range of factors including safety, pairing of bus stops, spacing of bus stops, local conditions such as terrain and footpaths and the number and type of customers using each stop.

Further information regarding the justification for the proposal is provided in section 3.1.1 while sections 3.2 to 3.31 address issues raised in relation to individual bus stop locations.

2.1.1 Issues raised by councils

A submission was received from Inner West Council that described concerns about proposed changes to some individual bus stops and support for others (on routes 412, 423, 426 and 428). Key concerns raised by Inner West Council included:

- Impacts on the community due to increased distances between stops
- Impact on accessibility to community facilities,
- Removal of highly used stops
- Removal of advertising at bus stops affecting existing revenue arrangements.

A submission was received from Bayside Council which encouraged changes along route 422 to provide priority for buses and sustainable transport, including planning for bicycles.

2.1.2 Issues raised by Members of NSW Parliament

Members of the NSW Parliament who provided submissions were concerned that the removal of bus stops would adversely impact on elderly passengers, those with a disability and parents and
carers with prams. It was pointed out that the bus services were in many cases vital to community members and their removal could be the difference between some people being able to access public transport or not.

2.1.3 Issues raised by community

A key issue raised in the submissions by the community related to accessibility and increased walking distance for the public, particularly to vulnerable members of the community including elderly, less mobile, disabled, young families and students. Concern was raised that the removal of stops would result in people no longer being able to access public transport to get to essential services including the Royal Prince Alfred Hospital and other community facilities.

Residents whose properties would be adjacent to proposed new bus stops raised concerns including safety and impacts from noise and air pollution. Safety concerns for pedestrians and traffic were raised along with the issue of security for people having to walk longer distances at night. Several submissions suggested the proposal is not consistent with encouraging the use of public transport. Increasing development in the area and the resultant potential for increased demand for bus stops was also raised.

2.1.4 Structure of responses to issues

The structure of Chapter 3 (Response to issues - community) and Chapter 4 (Response to issues - council) is outlined in Table 2-2. Note that the location reference numbers used in Table 2-2 and the remainder of this report differ from those used in the REF but correspond to those used in the following publicly displayed documents:

- Community Update February 2017 – Improving bus on-time running in Camperdown, Stanmore, Dulwich Hill and Marrickville
- Community Update February 2017 – Improving bus on-time running in Canterbury, Earlwood and Kingsgrove
- Community Update February 2017 – Improving bus on-time running in Arncliffe, Kogarah, Rockdale and Wolli Creek.

Issues raised in submissions and the associated responses by Roads and Maritime have been categorised by location (ie by bus stop) as a majority of the issues raised in the submissions primarily relate to specific bus stop locations. The issues have been further categorised based on the common points raised for each stop (such as pedestrian safety, increased walking distance or scope/justification). Proposal wide and out of scope submissions have been categorised with their own separate section. It is noted that some out of scope submissions have been categorised within the stop specific sections as relevant.

Table 2-2 Structure of Chapters 3 and 4

<table>
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**Chapter 4 (Response to issues - council)**

<p>| 4.1.1  | 412, 423, 426, 428 | All within Inner West local government area | Table 3-1, Table 3-3, Table 3-4, Table 3-5 | All within Inner West local government area |
| 4.1.2  | 412, 423, 426, 428 | All within Inner West local government area | Table 3-1, Table 3-3, Table 3-4, Table 3-5 | All within Inner West local government area |
| 4.1.3  | 412   | Salisbury Road, Camperdown | Table 2-1 (#1) | #7 |
| 4.1.4  | 412   | Salisbury Road, Stanmore | Table 3-1 (#2) | #9, #10, #11, #12, #13, #14 |
| 4.1.5  | 412   | Douglas Street, Stanmore | Table 3-1 (#3) | #15, #16 |
| 4.1.6  | 412   | Trafalgar Street, Petersham | Table 3-1 (#4) | #17, #18 |
| 4.1.7  | 412   | Livingstone Road, Marrickville | Table 3-1 (#5) | #21 |
| 4.1.8  | 412   | Beauchamp Street, Marrickville | Table 3-1 (#6) | #23 |
| 4.1.9  | 412   | Wardell Road, Marrickville | Table 3-1 (#7) | #24 |
| 4.1.10 | 423   | Victoria Road, Marrickville Road and Illawarra Road, Marrickville | Table 3-3 (#1, #4) | #59, #60, #61, #62 and #63 |
| 4.1.11 | 426   | Marrickville Road, Marrickville | Table 3-4 (#5) | #79 |</p>
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3 Response to issues - community

This chapter addresses issues raised by the community and three members of the NSW Parliament. A total of 213 submissions were received from the community and members of NSW Parliament. Of the 213 community submissions received, eight (about four per cent) stated support for the proposal as a whole or to individual changes, while 175 (about 82 per cent) objected. Most objections related to changes proposed at specific bus stop locations.

Section 3.1 of this chapter addresses proposal wide issues raised by the community and sections 3.2 to 3.31 address issues raised in relation to individual bus stop locations. Out of scope issues are primarily addressed in section 3.32, however are also mentioned within the individual bus stop sections in some instances.

3.1 Proposal wide issues

A total of 92 submissions were made in relation to the proposal as a whole. The main issues raised were:

- Need for and justification of the proposal
- Alternative approaches and suggestions
- Increased walking distances and the impact this would have on the elderly and less mobile
- Bus stop facilities including the need for shelters
- Standard of existing bus services
- Environmental impacts such as dust during construction
- Adequacy of the consultation process.

3.1.1 Justification of proposal

Submission number(s)

13, 18, 19, 21, 25, 26, 29, 30, 32, 33, 34, 36, 40, 42, 45, 51, 54, 55, 56, 59, 60, 70, 71, 72, 74, 77, 78, 87, 99, 100, 103, 107, 109, 111, 112, 117, 128, 130, 133, 134, 135, 137, 138, 140, 143, 144, 145, 147, 149, 150, 151, 152, 153, 160, 162, 174, 180, 181, 182, 185, 189, 190, 191, 192, 193, 199, 200, 213, 214

Issue description

The justification for the proposal was questioned by a number of submissions with the need for the proposal and its ability to improve bus reliability raised as key concerns. Some respondents questioned the proposal on the basis that, from the information provided, it is unclear how the proposal would improve bus priority and noted that further evidence and examples of where similar proposals have worked should be provided. Other respondents suggested that bus schedules need to be more realistic and account for congestion during peak periods.

Other key points made in relation to the justification for the proposal included:

- Issues with the reliability of bus services are due to traffic congestion and buses departing the depots later than scheduled
- The proposal is not needed as the buses currently run on time
- The proposal will discourage public transport use and contribute to traffic congestion
- There is potential for increased demand for some stops due to increasing residential development in the area and the temporary shutdown of the Bankstown train line
- There is the potential for overcrowding at retained stops
- Underutilised bus stops do not delay buses
- Parking should not be prioritised over buses.

A common theme in submissions was the impact the proposal would have on the elderly, people with a disability, young families, school students and those accessing childcare facilities and
hospitals. The emphasis on the bus reliability over the needs of these users was questioned as was the legality of the changes with regard to *Disability Discrimination Act 1992* (Commonwealth).

**Response**

**Strategic need, justification and options**

Transport for NSW and bus operators regularly receive thousands of complaints annually about slow and unreliable bus services. This can affect people’s perception of bus service quality compared to other travel choices and their ability to reliably access employment, education, medical and other services. A number of measures have been identified to address these issues targeting particular bus corridors that currently experience lower service reliability.

Making adjustments to the number and location of bus stops along a bus corridor is one measure that can help reduce the risk of delays to passengers. It limits the need for buses to continually pull in and out of traffic from poorly located stops where there are less customers compared to other adjacent stops along the route or where buses may miss green traffic lights or get caught in queues behind turning cars.

Chapter 2 (Need and options considered) of the REF describes the strategic need for the proposal and establishes its consistency with key strategic planning and policy documents. As noted in Section 2.1 of the REF, the proposal forms part of the Bus Priority Infrastructure Program which focuses on improvements in Rapid and Suburban routes, as outlined in *Sydney’s Bus Future* (Transport for NSW, 2013), and targets corridors that experience lower service reliability. Overall the proposal, as part of the Bus Priority Infrastructure Program, supports targeted improvements for bus on-time running through a range of initiatives, including:

- Combining or removing some bus stops where they are spaced close together
- Lengthening some bus stops to improve access for buses and assist passenger boarding and alighting
- Reducing potential delays for buses at traffic signals by moving stops to the departure side of the intersection allowing them to take advantage of the Public Transport Information and Priority System (PTIPS) which extends green time when a bus is approaching traffic signals.

While it is acknowledged that the road network can be highly congested resulting in delays and poor reliability for some bus services, the proposal would still improve bus reliability by reducing common sources of delay. A key issue is delays associated with servicing bus stops that are positioned too close together and which are underutilised. Numerous bus stops positioned closely together multiply the delays associated with a bus leaving the traffic stream, allowing customers to board / alight and then waiting to re-enter the traffic stream.

Improvements to the reliability of bus services are expected to encourage public transport use. While for some people optimisation of bus stop spacing would mean additional walking distance and reduced convenience, the proposed changes would still mean the bus services using the corridor would be accessible and would remain an attractive transport option.

The potential for overcrowding at retained stops is considered limited because the proposal targets not only bus stops that are positioned too close together, but also those which are underutilised. In most cases, the bus stops identified for removal have an average 24-hour weekday demand of less than 30 passengers and have usage which is lower than the preceding and/or following bus stops on the route. In some cases, the average 24-hour weekday demand is less than ten passengers.

**Accessibility**

The proposal has been developed to minimise impacts on bus stops near schools, aged care facilities and shops to ensure access to key bus stops is maintained. At some locations, the proposal has been revised following the public display period to further reduce impacts (refer to specific stop responses below and to Chapter 5 (Changes to the proposal) of this submissions report).

The proposal aims to strike a balance between:
• Maintaining a suitable walking distance to bus stops (ie within a 400 metre radius or an average five minute walk) and those key land uses which they service
• Providing a bus service that can keep to time and enable bus passengers to reach their destinations quickly and reliably.

While at individual locations the proposed changes may only seem to have small benefits, collectively they can deliver an important cumulative benefit to service reliability across the corridor as a whole.

Improving Transport Choice - guidelines for planning and development (NSW Department of Urban Affairs and Planning, 2001)\(^6\) is an important part of the State government’s commitment to promote urban areas in NSW as attractive, accessible and convenient places in which to live and work. The guidelines are part of a package of initiatives to improve the integration of land use and transport planning and provide principles, initiatives and best practice to improve access to more sustainable transport modes including public transport (buses and trains), walking and cycling.

The Improving Transport Choice guidelines recognise that the proximity of housing and other key land uses such as commercial centres and community facilities to public transport services is an important determinant in improving transport choice and managing travel demand in urban areas. In relation to land use and bus services, the guidelines recommend a maximum of 400 metres (about a five minute walk) from a bus route accessing a metropolitan railway station or equivalent mass transit node served at least every 20–30 minutes. This is generally consistent with the guidelines in Sydney’s Bus Future which recommend that people are within an average five minute walk to a bus stop (Transport for NSW, 2013).

The position and dimensions of new and relocated bus stops (and those existing stops subject to significant alteration as a result of the proposal) would be assessed against the requirements of AS 1428.1-2001 Design for Access and Mobility prior to becoming operational. A further safeguard (SOE3) has been included to address this in Chapter 6 (Environmental Management) of this report. The provision of accessible bus stops is a shared responsibility between both council and Transport for NSW. Roads and Maritime would liaise directly with councils and Transport for NSW during implementation of the proposal to ensure that resulting bus stop infrastructure changes (ie new or relocated stops and existing stops subject to significant alteration as a result of the proposal) have been considered against these requirements.

 Provision of parking

Provision of parking is not an objective of the proposal. However, where bus stops are proposed for removal and there is an opportunity to reinstate parking, this has been proposed. Provision of on-street parking can provide benefits for nearby residences and businesses.

The loss of parking is generally considered minimal with alternative parking available in the surrounding locality or parking losses being offset by gains in adjacent locations as a result of bus stop removals or relocations. The parking restrictions proposed are recommendations based on restrictions that currently exist on roads adjacent to proposal site. Transport for NSW and Roads and Maritime would confirm with the council the parking restrictions to be applied following the relocation or removal of specific bus stops. Council is responsible for implementation of parking restrictions on local roads (where parking is most affected by the proposal) and Roads and Maritime is responsible for the implementation of parking restrictions on State roads.

 Specific bus stop changes

Where the justification for changes at specific locations was raised in submissions, the justification for those changes is addressed in relevant sections below.

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\(^6\) The Department of Urban Affairs and Planning is now the Department of Planning and Environment
### 3.1.2 Alternative proposals and suggestions

**Submission number(s)**

2, 30, 34, 60, 61, 129, 147

**Issue description**

Several submissions suggested alternatives to the proposal or other measures that would benefit bus services. These included:

- Provision of more bus services and increased service frequency should be considered to address growth in the area rather than the removal of bus stops
- Provision of peak hour bus lanes
- Improvements to bus stops
- Use of smaller buses for local travel
- Adjustments to timetables to better service users
- Better definition of the L23 and 423 services during in peak (noting that these services currently pick up the same passengers offering little benefit Sydney University where they begin to stop at every second stop)
- GPS real-time information should be used to track buses
- Improved development planning and coordination.

**Response**

The proposal focuses on bus service reliability rather frequency and timetable changes. When buses consistently run on time, customers are better able to plan their trips and this in turn reduces waiting times.

The provision of bus lanes and bus priority at intersections is beyond the scope of the current proposal, but does form part of the Bus Priority Infrastructure Program. The optimisation of bus stop spacing complements these other bus priority measures.

The broader issue of development planning and coordination is beyond the scope of the current proposal. However, it is noted that the Greater Sydney Commission has recently released *Directions for a Greater Sydney* (Greater Sydney Commission, 2017). This document sets out ten directions which aim to align land use, transport and infrastructure planning and delivery across Greater Sydney. The first of the ten directions emphasises the provision of adequate infrastructure to support population growth. Further information is available at [www.greater.sydney](http://www.greater.sydney).

GPS data from the Public Transport Information Priority System (PTIPS) on Sydney buses, is currently used to improve bus service efficiency. It is also available to customers via several smartphone applications.

The respective stopping patterns for the 423 and L23 services are beyond the scope of the current proposal, however the on-time running performance of these services is monitored by Transport for NSW and changes may be proposed in the future where considered necessary.

### 3.1.3 Increased walking distance to stops

**Submission number(s)**

34, 41, 42, 57, 74, 99, 113, 127, 128, 149, 150, 185, 186, 198, 204, 214

**Issue description**

The impact of increasing the walking distance to remaining bus stops as a result of removing bus stops in general was raised. Specially, the impact of increased walking distances on the following users was questioned in submissions:

- Impact on elderly
- Impact on people with a disability
- Impact on people accessing St George Hospital and Royal Prince Alfred Hospital
• Impact on families
• Impact on users in general including those carrying shopping.

Alternative transport options such as taxis and hire cars were identified as not affordable.

A further concern with increased walking distance was safety for those walking to and from bus stops at night.

Response

Section 6.1.2 of the REF assesses the impact of the proposed changes to accessibility. The assessment acknowledges that there would be some additional walking distance and reduced convenience for some users from the proposal.

An important consideration in developing the proposal was to ensure bus stops used by local and suburban services in the corridor remained accessible, factoring in site specific considerations such as topography, walking distance, adjacent land uses and safe crossing facilities.

*Improving Transport Choice - guidelines for planning and development* (NSW Department of Urban Affairs and Planning, 2001) is an important part of the State government’s commitment to promote urban areas in NSW as attractive, accessible and convenient places in which to live and work. The guidelines are part of a package of initiatives to improve the integration of land use and transport planning and provide principles, initiatives and best practice to improve access to more sustainable transport modes including public transport (buses and trains), walking and cycling.

The *Improving Transport Choice* guidelines recognise that the proximity of housing and other key land uses such as commercial centres and community facilities to public transport services is an important determinant in improving transport choice and managing travel demand in urban areas. In relation to land use and bus services, the guidelines recommend a maximum of 400 metres (about a five minute walk) from a bus route accessing a metropolitan railway station or equivalent mass transit node served at least every 20 to 30 minutes. This is generally consistent with the guidelines in *Sydney’s Bus Future* which recommend that people are within an average five minute walk to a bus stop (Transport for NSW, 2013). In denser urban areas with higher frequency services, the *Improving Transport Choice* guidelines state that the walking catchment could be up to 600 to 800 metres.

Where distances between stops have exceeded 400 metres, consideration was given to ensure that the proposed spacing maintained a 400 metre walking catchment (or five minute walk) to the nearest bus stop in accordance with the guidelines of *Sydney’s Bus Future* and *Improving Transport Choice* described above.

Based on these guidelines, bus stop spacings of up to 800 metres would maintain an accessible walking catchment to the nearest bus stop of 400 metres, however proposed bus stop spacings have generally been kept well below 800 metres to maintain a duplicate coverage area that potentially provides bus users with a choice of stops in some locations. Where removing a bus stop would result in excessive distance between stops for local and / or suburban routes, no changes have been proposed.

Where concerns were raised about increased walking distance from the removal of specific bus stops, a response is provided in the relevant sections below.

3.1.4 Bus stop facilities

Submission number(s)

45, 113

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7 The Department of Urban Affairs and Planning is now the Department of Planning and Environment
**Issue description**

The provision and design of bus shelters was raised. One submission noted that it is important that new bus stops be provided with shelters, seats and timetable information.

One submission commented that the design of bus shelters could be improved to minimise heat in warm weather and provide from heavy rain and wind. They need overhaul of design and construction.

**Response**

The provision of bus stop infrastructure, including bus shelters, is the responsibility of council. Issues raised regarding bus shelters will be forwarded to council for consideration.

An opportunity to provide a new bus shelter at Location #12 (Salisbury Road, Stanmore – outbound) has been identified. Shelters could also be provided at the following locations where bus stops are proposed to be relocated:

- Route 422, Location #49 (Princes Highway near Gertrude Street, Rockdale – outbound) (bus stop 220561)
- Route 423, Location #59 (Victoria Road near Sydenham Road, Marrickville – outbound) (bus stop 220449)
- Route 423, Location #68 (William Street near Woolcott Street, Canterbury – inbound) (bus stop 220699).

Where new or relocated bus shelters are proposed, customer information such as timetables would be provided. Bus shelter designs would be finalised in consultation with the relevant local council and may be refined to suit local conditions.

### 3.1.5 Bus services

**Submission number(s)**

34, 47, 71, 72

**Issue description**

In summary, submissions raised the following issues in relation to bus services:

- Poor standard, frequency and reliability of bus services
- Difficulty in accessing facilities such as major hospitals.
- Difficulty in planning trips because timetables displayed at the bus stop differ from the timetables on the Sydney Buses website, which is also on occasion different to the information on public transport smartphone applications
- Bus timetables do not align with train timetables at key stops.

**Response**

The proposal aims to improve the reliability of bus services which in turn will allow customers to better plan their trips and will provide improved access to major facilities such as hospitals. Comments regarding bus timetables will be considered by Transport for NSW, however changes to bus timetables are beyond the scope of the proposal.

### 3.1.6 Environmental and amenity impacts

**Submission number(s)**

113

**Issue description**

A concern was raised about the environmental impacts, particularly dust, from construction at multiple sites.
Response

Chapter 6 (Environmental assessment) of the REF considers the potential environmental impacts associated with the proposal. While there would be some environmental impacts as a consequence of the proposal, they have been avoided or minimised wherever possible through design and site-specific safeguards summarised in Chapter 7 (Environmental management) of the REF.

The REF notes that dust associated with the proposal is expected to be below nuisance levels given the very small areas of ground disturbance. Measures (including watering or covering exposed areas) will be used to minimise dust, where necessary.

3.1.7 Stakeholder and community consultation

Submission number(s)
2, 4, 6, 8, 19, 46, 49, 59, 82, 113, 145, 147, 195, 215

Issue description
In summary, the following issues were raised about the consultation process and materials:

- Communication of proposal not adequate and there was limited time to comment
- The email addresses shown on the notices at bus stops were incorrect
- Difficulty in getting a response from the community information line
- Colours in the communications material are difficult to read, particularly for older people
- Query as to why bus stops on Douglas Street near Stanmore Station or Percival Road outside the shops are not identified in communications material
- Community update does not show route 428 running on Livingstone Road south of Addison Road

The process for consideration of submissions was queried and it was emphasised that submissions needed to be taken seriously with suitable responses provided.

Response

As noted in section 1.2 of this submissions report, the REF was publicly displayed for 29 days between 8 February 2017 and 8 March 2017. The REF was also placed on the Roads and Maritime project website and made available for download and its availability was advertised in relevant local newspapers.

In addition to the public display, a community update was letterbox-dropped to residents and businesses, and additional stakeholders were sent the community update with a covering email/letter. During the public display period, project team staff also visited many potentially affected residents, businesses and other stakeholders near bus stops with significant changes.

The project team did experience some difficulties with the functionality of the email address and the phone line during public display and apologise for any inconvenience this caused.

Comments about the colours used in consultation materials are noted and this will be considered for the preparation of any future materials.

This submissions report documents the Transport for NSW / Roads and Maritime response to the submissions received and any resulting changes to the proposal. Review of submissions as documented in this report will inform the final decision on the proposal.
3.1.8 Request for information

Submission number(s)
15, 67

Issue description
Confirmation was sought on whether bus stops near the intersection of Marrickville Road and Wardell Road are impacted by the proposal and if there would be any resulting timetable changes as a result of the proposal.

Response
From the information provided, it is unclear to which bus stops the respondent is referring. No changes to bus stops near the intersection of Marrickville Road and Wardell Road are proposed. Timetable changes do not form part of the proposal.

3.1.9 Proposal cost

Submission number(s)
29, 135, 149

Issue description
Some submissions suggested the proposal is a waste of money, indicating funds would be better spent on increasing the frequency of buses or on other programs such as the provision of social housing.

Response
Chapter 2 (Need and options considered) of the REF describes the strategic need for the proposal and establishes its consistency with key strategic planning and policy documents. The proposal targets improved reliability of bus services and is considered to offer value for money.

3.1.10 General support for proposal

Submission number(s)
15, 91, 165

Issue description
Some submissions expressed general support for the proposal noting issues with the reliability of existing services.

Response
Support for the proposal is noted. The community and stakeholders will be advised of the decision regarding proposal.

3.2 Route 412 – Removal of stop 205027, Salisbury Road near Mary Street, Camperdown (#7)

A total of nine community submissions were received regarding the proposed removal of stop 205027(#7), eight of which were against the change. The main issues raised were:

- Need for and justification of the proposed change
- Pedestrian safety and access to crossings
- Increased walking distances and the impact this would have on the elderly and less mobile
- Alternatives to the proposed change.
3.2.1 Scope / justification of removal

Submission number(s)
3, 16, 52, 71, 90, 142, 170

Issue description
The justification for the removal of bus stop 205027 (#7) was raised as an issue. Particular points made about the justification for the removal of this stop include:

- The stop is well used including by students, people accessing the Royal Prince Alfred Hospital, people with a disability, young families and park and ride commuters
- Buses can pull-out from this stop than more easily than the alternative stops
- The resulting addition of parking spaces has no benefit
- Removal of the stop would cause overcrowding at remaining stops and therefore buses would have to stop for longer
- In the future, there is potential for an increased demand for use of the stop by young families and students.

Response
Section 3.1 of this report addresses the strategic need and justification for the proposal. It also considers the issues of bus stop accessibility and parking.

Table 2-1 in section 2.1 the REF identified the particular bus service issues for this bus stop. The bus stop was identified for removal because it is close to the preceding stop opposite Kingston Lane (about 150 metres) and the next stop near Gibbens Lane (about 210 metres). This results in a spacing of about 360 metres which is closer to the 400 metre guideline spacing under Sydney’s Bus Future.

Opal data also shows that the proportion of seniors/pensioners using the stop is 17 per cent, which is similar to the preceding stop (14 per cent for stop 205026) and the next stop (17 per cent for stop 205028). Grades are moderate and footpaths are provided assisting access to alternative stops near this location.

Given the number of customers at this bus stop (24-hour weekday demand of 45 passengers) is low compared to adjacent stops (32 for stop 205026 and 30 for stop 205028), increases in passengers at adjacent bus stops (205026 and 205028) would be modest and a significant change to the dwell time for buses at those stops is not expected. No issues with buses accessing the alternative stops have been identified.

The provision of on-street parking at this location is not an objective of the proposal, however parking demand is high in this area given the surrounding land uses and the provision of two on-street car spaces may benefit nearby businesses, residents and visitors.

The removal of this stop will optimise bus stop spacing and reduce delays. Changes in future demand at bus stops on Route 412 will be monitored by Transport for NSW.

3.2.2 Pedestrian safety

Submission number(s)
73, 90, 170

Issue description
Concerns were raised about safety for pedestrians and access to the nearest pedestrian crossing for parents and small children.

Response
A pedestrian crossing is located about 20 metres to the east of bus stop 205027 (#7) and this would be retained. The alternative bus stops opposite Kingston Lane (205026) and near Gibbens
Lane (205028) both have safe crossing options at nearby traffic lights (those on Kingston Street and Australia Street respectively).

### 3.2.3 Increased walking distance to next stop

**Submission number(s)**
52, 73, 90, 170

**Issue description**
Concerns were raised about the impact of increased walking distances for users in general as well as particular groups including the elderly, people with a disability having to walk further on a hill and those accessing child care facilities.

**Response**
Table 2-1 in section 2.1 of the REF identified the particular bus service issues for this bus stop. The bus stop was identified for removal because it is close to the preceding stop opposite Kingston Lane (205026) (about 150 metres) and the next stop near Gibbens Lane (205028) (about 210 metres).

Opal data also shows that the proportion of seniors/pensioners using the stop is 17 per cent of the total number of people using the stop, which is similar to the preceding stop (14 per cent for stop 205026) and the next stop (17 per cent for stop 205028). Grades are moderate in this location and footpaths are provided to assist with access to alternative stops.

### 3.2.4 Alternative proposals

**Submission number(s)**
50, 71

**Issue description**
Submissions suggested that bus stop 205026 be removed instead as it is less used and is less convenient for buses to pull out from. This alternative would have less impact on residential properties and would increase parking spaces. Suggestion that more buses could be provided in the peak period instead of removing this bus stop.

**Response**
Bus stop 205026 was not considered for removal because it forms a pair with bus stop 205036. Paired bus stops provide a better customer experience by allowing boarding and alighting to happen near each other, with the opposite stop clearly visible.

### 3.3 Route 412 – Consolidation of stops 204821 and 204822, Salisbury Road near Durham Street and Myrtle Street (#9 and #14) and 204818 and 204817, Salisbury Road near Northumberland Avenue and Myrtle Street, Stanmore (#10 and #13)

A total of ten community submissions were received regarding the proposed consolidation of bus stops 204821 and 204822 (at Locations #9 and #14 respectively) and bus stops 204818 and 204817 (at Locations #10 and #13 respectively)\(^8\), five of which were against the change and one of which was in support. The main issues raised were:

- Need for and justification of the proposed change
- Loss of parking

\(^8\) Removal of four bus stops, establishment of two new bus stops (with new transit stop numbers) at a new location.
• Safety for vehicles reversing out of driveways near the new bus stops
• Increased walking distances and the impact this would have on the elderly and less mobile
• Alternatives to the proposed change.

3.3.1 Scope / justification of consolidation

Submission number(s)
17, 45, 69, 122, 143, 144, 156, 162, 213

Issue description
The justification for the consolidation of stops 204821 and 204822, Salisbury Road near Durham Street and Myrtle Street (#9 and #14) and 204818 and 204817, Salisbury Road near Northumberland Avenue and Myrtle Street, Stanmore (#10 and #13) was raised as an issue. Particular points made were:

• Current bus stops are accessible via connecting cross streets for the surrounding residential area and the removal of bus stops 204821 (#9), 204822 (#14), 204818 (#10) and 204817 (#13) would affect access the Royal Prince Alfred Hospital, including for the elderly.
• Traffic congestion is the cause of delays in the area.
• Bus stops 204817 (#13) and 204822 (#14) are only used by a small group of commuters and therefore their relocation will not improve running times for buses.

One submission requested that following the removal of bus stop 204817 (#13), all concrete be removed and the grass verge be reinstated with trees.

Response
Section 3.1 of this report addresses the strategic need and justification for the proposal. It also considers the issues of bus stop accessibility and parking.

Table 2-1 in section 2.1 of the REF identified the particular bus service issues for these bus stops. This group of bus stops was identified for consolidation primarily because they are closely spaced. The proposal would bring these bus stops closer to the 400 metre guideline spacing, with the Location #11 stop about 310 metres from the previous (204816) and following stops (204819) and the Location #12 stop about 370 metres from the previous stop (204820) and 390 metres from the following stop (204811).

The number of customers boarding and alighting at the existing bus stops also indicates scope for consolidation. Opal data shows an average 24-hour weekday demand of:

• 33 passengers for bus stop 204821 (#9), compared with 41 for the preceding stop (204820) and 13 for the following stop (204822) (#14)
• 28 passengers for bus stop 204818 (#10), compared with 7 for the preceding stop (204817) (#13) and 41 for the following stop (204819)
• 7 passengers for bus stop 204817 (#13), compared with 80 for the preceding stop (204816) and 28 for the following stop (204818) (#10)
• 13 passengers for bus stop 204822 (#14), compared with 33 for the preceding stop (204821) (#9) and 75 for the following stop (204811) (204811).

Assuming all existing users of these stops use the new consolidated stops, the 24-hour weekday customer numbers of the new inbound stop would be 35 and the new outbound stop would be 46. While there would be some additional walking distance and reduced convenience for some users from the proposal, the consolidated bus stops would still provide convenient access to adjacent residential areas including for those people needing to access Royal Prince Alfred Hospital. Access to consolidated bus stops would be assisted by the existing concrete footpaths on both sides of Salisbury Road and the flat grades in the area.

While it is acknowledged that road network can be highly congested resulting in delays and poor reliability for some bus services, the proposal would still improve bus reliability by reducing common sources of delay at this location. Numerous bus stops positioned closely together multiply
the delays associated with a bus leaving the traffic stream, allowing customers to board / alight and then waiting to re-enter the traffic stream. These delays occur even when the number of customers using a bus stop is low relative to other stops on the bus route.

There is an opportunity remove concrete at the location of bus stop 204817 (#13) and reinstate the grass verge with trees. This would be managed by Inner West Council.

### 3.3.2 Parking loss

**Submission number(s)**  
144, 186

**Issue description**  
Concerns were raised about the impact of parking loss on residents and visitors, noting that houses on this section of Salisbury Road have no provision for off-street parking.

**Response**  
Transport for NSW and Roads and Maritime would confirm with the council the parking restrictions to be applied following the relocation or removal of specific bus stops. Council is responsible for implementation of parking restrictions on local roads (where parking is most affected by the proposal) and Roads and Maritime is responsible for the implementation of parking restrictions on State roads.

The proposed consolidation of bus stops is expected to result in the loss of three on-street car spaces at Location #11 and four on-street car spaces at Location #12. It is acknowledged that this may affect the convenience of access to on-street parking for occupants and visitors to immediately adjacent residents. However, the loss of parking at these locations is more than offset by a gain of three on-street car spaces at Location #9, one on-street car space at Location #10, one on-street car space at Location #13 and three on-street car spaces at Location #14. The proposal therefore improves the supply of on-street parking within the immediate locality.

### 3.3.3 Traffic safety

**Submission number(s)**  
122

**Issue description**  
Comment that use of the proposed bus stop at Location #12 will conflict with vehicles exiting the adjacent driveway. This will create a safety issue.

**Response**  
The design of the proposed bus stop at Location #12 would allow for buses to safely move in and out of the bus zone.

In the preliminary assessment phase, Roads and Maritime’s Network and Safety team undertook an initial safety review of the bus stop locations identified for potential relocation / removal / extension, taking into consideration the following factors:

- Curvature of the road and sight distance
- Location in relation to traffic signals and pedestrian crossings
- Adjacent land uses
- Vegetation and street tree plantings
- Adjacent traffic or parking restrictions
- Distances to adjacent bus stops

The comments from the Network and Safety team were then considered via workshops in developing the proposal. Consultation with Transport for NSW and State Transit Authority also occurred to ensure the proposed changes are suitable with respect to the factors noted above.
### 3.3.4 Increased walking distance to next stop

**Submission number(s)**
156

**Issue description**
One submission raised the issue of access for residents, including the elderly, to Royal Prince Alfred Hospital with the proposed removal of the bus stops at Location #9 (204821) and Location #10 (204818). It was also noted that the removal of these bus stops will involve longer walking distances for people living on or near on Northumberland Avenue and that this, coupled with the condition of footpaths, will force people to travel to the hospital by taxi, which is unaffordable for many.

**Response**
The 412 bus service (which stops on Missenden Road outside Royal Prince Alfred Hospital) would stop at the new consolidated bus stops at Locations #11 and #12. For residents on Northumberland Avenue, this would mean an additional walking distance of about 70 metres to access the bus stop at Location #11 and about 85 metres to access the bus stop at Location #12. The grades over these additional walking distances are flat and the footpaths were noted to be in an acceptable condition. Any specific concerns about the condition of footpaths, including requests for repair, can be raised with Inner West Council via Council’s website.

### 3.3.5 Environmental and amenity impacts

**Submission number(s)**
122, 186

**Issue description**
Concerns were raised about the potential noise and other amenity impacts associated with the new consolidated bus stops, including:
- Amplification of noise by the brick walls on both sides of Salisbury Road at this location
- Noise from people congregating that the bus stops
- Impacts from people smoking at the bus stop
- Increased litter.

**Response**
As noted in section 6.4.4 of the REF, some short term static noise and other amenity impacts associated with pick-up and departure of buses, and waiting passengers at bus stops, may be noticeable. This would be relatively infrequent and would be experienced in the context of existing road traffic noise from other vehicles. The same static noise impacts would be eliminated at other locations where bus stops are removed. Buses would not be idling for extended periods at any of the new / relocated bus stops.

Littering is an issue best addressed through education and enforcement. Inner West Council Council’s Community Enforcement Officers are responsible for investigation and enforcement of littering.

### 3.3.6 Alternative proposals

**Submission number(s)**
122
Issue description
One submission suggested bus stop 204818 (#10) be retained in its current position and bus stop 204821 (#9) be relocated to the east adjacent to Bain Playground as this would have a lesser impact on residents in terms of noise and amenity.

Response
The reasons for removing bus stop 204821 (#9) and bus stop 204818 (#10) are outlined above in section 3.3.1. Retaining bus stop 204818 (#10) in its current position and relocating bus stop 204821 (#9) adjacent to Bain Playground was not considered because it would separate a bus stop pair. Paired bus stops provide a better customer experience by allowing boarding and alighting to happen near each other, with the opposite stop clearly visible.

3.3.7 General support

Submission number(s)
69

Issue description
Support was expressed for the removal of bus stop 204817 (#13) on the basis that it is hardly used, is an eyesore and prevents parking in the area.

Response
Support noted.

3.4 Route 412 – Removal of stops 204824 and 204815, Douglas Street near Bruce Street, Stanmore (#15 and #16)

A total of thirteen community submissions were received regarding the proposed removal of the bus stops 204824 and 204815 at Locations #15 and #16 respectively, twelve of which were against the change. The main issues raised were:

- Need for and justification of the proposed change given they are well used
- Traffic safety
- Increased walking distances and the impact this would have on the elderly and less mobile
- Alternatives to the proposed change.

3.4.1 Scope / justification of removal

Submission number(s)

Issue description
The justification for the removal of stops 204824 and 204815, Douglas Street near Bruce Street, Stanmore (#15 and #16) was raised as an issue. Particular points made about the justification for the removal of these stops include:

- Bus stops 204824 (#15) and 204815 (#16) are well used and well positioned for elderly and less mobile people at the top of a steep hill and with safe crossing opportunities
- Bus stops 204824 (#15) and 204815 (#16) provide access to important medical and social services including Royal Prince Alfred Hospital
- Opal data used was gathered during morning and afternoon peak periods, and on Saturday mornings, and usage by older residents may not have been captured.
- The removal of these stops would not assist on-time running because Douglas Street is congested during peak periods.
Response

Section 3.1 of this report addresses the strategic need and justification for the proposal. It also considers the issues of bus stop accessibility and parking.

Table 2-1 in section 2.1 of the REF identified the particular bus service issues for these bus stops. Bus stop 204824 (#15) was identified for removal because it is close to the preceding stop near Albany Road (about 240 metres) and the next stop on Percival Road (about 300 metres). Bus stop 204815 (#16) was identified for removal because it is close to the preceding stop near Percival Road (about 240 metres) and the next stop near Stanley Street (about 200 metres). With the proposed changes, this results in a spacing of about 540 metres and 440 metres for bus stop 204824 (#15) and bus stop 204815 (#16) respectively.

The number of customers alighting and boarding at these stops is low relative to the preceding and following stops (inbound stops 204814 and 204816, outbound stops 204811 and 204825). Opal data shows an average 24-hour weekday demand of twelve passengers for bus stop 204824 (#15) (compared with 35 for the preceding stop and 79 for the following stop) and 18 passengers for bus stop 204815 (#16) (compared with 74 for the preceding stop and 29 for the following stop).

Opal data also shows that for bus stop 204824 (#15) an average of three seniors/pensioners use the stop on Saturday and an average of less than one seniors/pensioners use the stop on Sundays. For bus stop 204815 (#16) an average of five seniors/pensioners use the stop on Saturday and an average of less than three seniors/pensioners use the stop on Sundays.

It is acknowledged that these bus stops are located mid-way up the hill which extends from Stanmore Station to Crystal Street. People living near these bus stops would have the option of walking downhill to access outbound bus stop 204811 (about 240 metres) or inbound bus stop 204816 (about 300 metres). They would also have the option of disembarking at outbound bus stop 204825 and walking downhill (about 200 metres) or at inbound bus stop 204814 and walking downhill (about 240 metres).

The alternative stops referred to above all have nearby signalised pedestrian crossing facilities (with some additional walking required).

While it is acknowledged that the road network can be highly congested resulting in delays and poor reliability for some bus services, the proposal would still improve bus reliability by reducing common sources of delay at this location. Numerous bus stops positioned closely together multiply the delays associated with a bus leaving the traffic stream, allowing customers to board / alight and then waiting to re-enter the traffic stream.

3.4.2 Increased walking distance to next stop

Submission number(s)
43, 44, 146, 155, 160, 195, 215

Issue description
Concerns were raised that the proposed changes would increase walking distances for bus users. It was noted this would particularly impact on the elderly, people with a disability and young families, affecting their, independence, quality of life and access to key services including Royal Prince Alfred Hospital.

Specific reference was made to the use of Opal data, noting that it does not account for how essential these bus stops are to particular users.

Response
While the spacing between stops has increased to greater than 400 metres, the proposed stop locations in this area still maintain a walkable catchment (ie stops within a 400 metre radius or a five minute walk) consistent with the Improving Transport Choice and Sydney's Bus Future guidelines (refer to Section 3.1 for further information about bus stop accessibility).
It is acknowledged that the proposal would increase walking distances for some people in this location and that these bus stops are located mid-way up the hill which extends from Stanmore Station to Crystal Street. People living near these bus stops would have the option of walking down hill to access outbound bus stop 204811 (about 240 metres) or inbound bus stop 204816 (about 300 metres). They would also have the option of disembarking at outbound bus stop 204825 and walking down hill (about 200 metres) or at inbound bus stop 204814 and walking down hill (about 240 metres).

3.4.3 Traffic safety

Submission number(s)
164

Issue description
Concerns were raised about the potential for limited sight lines for drivers turning right out of Bruce Street (northern side) where the bus stop is currently located. It was noted that it will be more difficult to see traffic coming from Crystal Street with the proposed addition of three car spaces at this location, particularly if vans or SUVs park in those spaces.

Response
Following further review of the concept design, it is now recommended that bus stop 204824 (#15) be replaced with No Stopping rather than No Parking. This change addresses concerns about sight distances for cars turning from Bruce Street. As Douglas Street is not a State road, implementation of parking restrictions at this location would be the responsibility of Inner West Council.

3.4.4 Alternative proposals

Submission number(s)
44, 155

Issue description
Suggested alternatives to the proposal at this location were:

- Removing bus stop 204824 (#15) and retaining bus stop 204815 (#16) because this would assist on-time running in for city bound buses in the morning people and allow people to avoid an uphill walk following their return journey
- Removing the bus stop on Crystal Street near Douglas Street (204945) as this stop is just 160 metres from the bus stop on Albany Road.

Response
Removing bus stop 204824 (#15) and retaining bus stop 204815 (#16) would separate a bus stop pair. Paired bus stops provide a better customer experience by allowing boarding and alighting to happen near each other, with the opposite stop clearly visible. People returning from the city would have the option of disembarking at outbound bus stop 204825 and walking down hill (about 200 metres).

Bus stop 204945 on Crystal Street near Douglas Street was not considered for removal because it services Routes 444 and 445. Route 412 services do not stop at bus stop 204945.

3.5 Route 412 – Removal of stops 204923 and 204926, Trafalgar Street near Audley Street, Petersham (#17 and #18)

A total of two community submissions were received regarding the proposed removal of bus stops 204923 and 204926 at Locations #17 and #18, both of which were against the change. The main issues raised were:
• Need for and justification of the proposed change given they are well used
• Additional fares
• Increased walking distances and the impact this would have on the elderly and less mobile.

3.5.1 Scope / justification of removal

Submission number(s)
39

Issue description
The justification for the change at this location was questioned noting that these bus stops are well positioned at Petersham Station and there are nearby traffic lights which allow safe crossing of Trafalgar Street for the elderly, disabled and parents with small children.

Response
One of the submissions may be confusing bus stop 204923 (#17) and bus stop 204926 (#18) with bus stops 204911 and 204912, located further to the east. Bus stops 204911 and 204912 have more direct access to Petersham Station and have an adjacent signalised pedestrian crossing. No changes are proposed to bus stops 204911 and 204912.

3.5.2 Additional bus fares

Submission number(s)
39

Issue description
A concern was raised that the proposed removal of these stops would result in additional fares because it adds an extra zone to trips.

Response
Opal fares are not a specific consideration for bus stop locations. Opal bus fares are charged based on three straight-line distance bands and are calculated by the straight-line distance between boarding and alighting stops. The planned removal or relocation of targeted bus stops as part of this project would be unlikely to impact on a large number of customers.

3.5.3 Increased walking distance to next stop

Submission number(s)
185

Issue description
A concern was raised that the removal of these bus stops will make the gap between Petersham Station and Gordon Street near New Canterbury Road, Petersham, too large. It was also noted that Trafalgar Street is quite steep and not a level walk for elderly or less mobile people.

Response
Bus stop 204923 (#17) is close to the preceding stop near on Gordon Street (about 400 metres) and the next stop (204911) on Trafalgar Street near Petersham Station (about 190 metres). Bus stop 204926 (#18) is close to the preceding stop near Petersham Station (204912) (about 240 metres) and the next stop on Gordon Street (204953) (about 200 metres). With the proposed changes, this results in a spacing of about 590 metres.

While the spacing between stops has increased to greater than 400 metres, the proposed stop locations in this area still maintain a walkable catchment (ie stops within a 400 metre radius or a
five minute walk) consistent with the *Improving Transport Choice* and *Sydney’s Bus Future* guidelines (refer to Section 3.1 for further information about bus stop accessibility).

In this instance, the bus route does not follow the shortest walking distance between the stops in either direction. Residents to the west and south of the subject stops can use other streets such as Nelson Place and Sadlier Crescent to access the stops on Gordon Street. The maximum additional walking distance as a result of the change would be 375 metres (the approximate shortest walking distance between 204923 (#17) and the previous inbound stop on Gordon Street (204952).

### 3.6 Route 412 – Removal of stop 220429, Livingstone Road near Marrickville Road, Marrickville (#21)

A total of four community submissions were received regarding the proposed removal of bus stop 220429 at Location #21, three of which were specifically against the change. The main issues raised were:

- Need for and justification of the proposed change given it is well used and close to community facilities
- Increased walking distances and the impact this would have on the elderly and less mobile.

#### 3.6.1 Scope / justification of removal

**Submission number(s)**

131, 186

**Issue description**

The justification for removing bus stop 220429 (#21) was questioned on the basis of the following:

- It is well used
- It is relied on by elderly people
- It is close to important community facilities including the proposed new library and St Brigids Church and Parish Primary School
- The change would be a waste of money
- It is the closest stop to interchanging with bus routes along Marrickville Road or for people wishing to go to Marrickville shops and accessing other amenities.

**Response**

Section 3.1 of this report addresses the strategic need and justification for the proposal. It also considers the issues of bus stop accessibility and parking.

Table 2-1 in section 2.1 of the REF identified the particular bus service issues for this bus stop. Bus stop 220429 (#21) was identified for removal because it is located close to the preceding stop near Graham Avenue (about 230 metres) and the next stop south of Marrickville Road (about 150 metres). This results in a spacing of about 380 metres which is closer to the 400 metre guideline spacing.

As noted in Table 2-1 in section 2.1 of the REF, this stop does have average 24-hour weekday demand of 59 passengers, with 48 per cent usage by seniors / pensioners. These people would be able to access the 412 services via adjacent bus stops (220428 or 2204108).

The proposal for a new Marrickville Library, associated community spaces and apartments at 313 - 319 Marrickville Road is noted. Residents and users of these facilities would still have access to the nearby bus stops referred to above to access these facilities and to interchange with other bus services on Marrickville Road.
3.6.2 Increased walking distance to next stop

Submission number(s)
73, 145, 214

Issue description
Concerns were raised about increased walking distances for the elderly, disabled and young families to access the alternative bus stops on Livingstone Road and the impact this would have on their ability to access the Marrickville Health Centre at 155-157 Livingstone Road. The lack of pedestrian crossing facilities near the alternative bus stop to the north on Livingstone Road was also noted.

Response
The preceding stop on Livingstone Road near Graham Avenue bus stop 220428 is located at a distance of about 230 metres from bus stop 220429 (#21) and has a nearby pedestrian refuge. There is a gentle uphill walk on established footpaths from this bus stop to access the Marrickville Health Centre and other nearby facilities. Alternatively, customers have the option of disembarking the 412 services at bus stop 2204108 (#22) on the southern side of Marrickville Road and using the signalised pedestrian crossings at the Marrickville Road / Livingstone Road intersection.

3.7 Route 412 – Removal of stop 220494, Beauchamp Street near School Parade, Marrickville (#23)

A total of ten community submissions were received regarding the proposed removal of bus stop 220494 at Location #23, nine of which were specifically against the change. The main issues raised were:

- Need for and justification of the proposed change given it is well used and has a shelter
- Increased walking distances and the impact this would have on the elderly and less mobile
- Alternatives to the proposed change.

3.7.1 Scope / justification of removal

Submission number(s)
53, 75, 86, 121, 104, 158, 159, 168, 169, 214

Issue description
The justification for the removal of bus stop 220494 (#23) was questioned on the basis of the following:

- Current levels of usage
- The bus stop has shelter with a seat and a good view of the approaching bus and provides access to Marrickville West Primary School, child care and cultural services
- The bus stop is used by the elderly and others to access Royal Prince Alfred Hospital
- The change would be a waste of money
- The cause of delays is traffic congestion (in the Sydney CBD and along the route)
- There would be no benefit given that it would take longer for more people to board buses at the alternative stops
- Removal of this bus stop could encourage people to drive.

Response
Section 3.1 of this report addresses the strategic need and justification for the proposal. It also considers the issues of bus stop accessibility and parking.

Table 2-1 in section 2.1 the REF identified the particular bus service issues for this bus stop. Bus stop 220494 (#23) was identified for removal because it is close next stop near Livingstone Road.
(about 140 metres), which is the main stop for Marrickville West Public School and provides safe crossing access for school children at the adjacent to the signalised intersection. The number of customers boarding and alighting is low at this bus stop relative to the preceding (2204103) and following (2204105) stops with Opal data showing average 24-hour weekday demand of 27 passengers (compared with 39 at the preceding bus stop and 46 at the following stop).

Bus stop 220494 (#23) also lacks a corresponding outbound stop. Paired bus stops are preferred because they improve the customer experience by allowing boarding and alighting to happen near each other, with the opposite stop clearly visible.

With the proposal, there would be a spacing of about 490 metres, which is closer to the 400 metre guideline spacing. While it does not have a shelter, alternative bus stop near Livingston Road would still represent at an attractive public transport option providing access to Marrickville West Primary School and other local facilities.

While it is acknowledged that road network can be highly congested resulting in delays and poor reliability for some bus services, the proposal would still improve bus reliability by reducing common sources of delay at this location. Numerous bus stops positioned closely together multiply the delays associated with a bus leaving the traffic stream, allowing customers to board / alight and then waiting to re-enter the traffic stream.

3.7.2 Increased walking distance to next stop

Submission number(s)
53, 169

Issue description
Concerns were raised about increased walking distances for the elderly, disabled and young families to access the alternative bus stop near Livingstone Road. It was noted that to access the alternative stop would require people to walk up a steep hill.

Response
The removal of 220494 (#23) would result in a maximum additional walking distance of about 140 metres. While the grade is moderate, there is a pathway and pedestrian refuge which facilitates crossing of School Parade.

3.7.3 Alternative proposals

Submission number(s)
53, 75, 86, 104

Issue description
Respondents suggested removing bus stop 2204105 rather than 220494 (#23) because it has lower usage and no shelter. A comment was also made about the need for more school buses to address overcrowding on the 412 bus route during school pick up and drop off hours.

Response
Bus stop 2204105 was not considered for removal because it would separate a bus stop pair. Paired bus stops provide a better customer experience by allowing boarding and alighting to happen near each other, with the opposite stop clearly visible.

Transport for NSW encourages school children using existing route bus services over the provision of dedicated school specials where possible. If there are specific access needs at the school, parents or the school can contact the local bus operator (State Transit) to discuss whether any school specials would be feasible. The provision of more school buses at this location is beyond the scope of the current proposal.

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3.8 Route 412 – Removal of stop 220498, Wardell Road near Ewart Street, Marrickville (#24)

A total of five community submissions were received regarding the proposed removal of bus stop 220498 at Location #24, four of which were specifically against the change. The main issues raised were:

- Need for and justification of the proposed change given it provides access to Dulwich Hill Station and is likely to have increased demand in the future
- Increased walking distances and the impact this would have on the elderly and less mobile
- Alternatives to the proposed change.

3.8.1 Scope / justification of removal

Submission number(s)
139, 145, 185, 214

Issue description
Section 3.1 of this report addresses the strategic need and justification for the proposal. It also considers the issues of bus stop accessibility and parking.

The justification for the removal of bus stop 220498 (#24) was questioned on the basis that the alternative stop (220432) would be difficult to access for less mobile people. The high utilisation of this stop was also noted. Other issues raised included:

- Access to safe crossing opportunities
- Shelter provided by the stop
- Access to Dulwich Hill Station
- Access to the southern portion of the Dulwich Hill business district, including a newsagent, mechanic and cafes
- Increased demand due to apartment developments.

Response
Table 2-1 in section 2.1 of the REF identified the particular bus service issues for this bus stop. Bus stop 220498 (#24) was identified for removal because it is located close to the preceding stop at Dulwich Hill Station (about 130 metres) and the next stop near Riverside Crescent (about 210 metres). This stop also has low usage relative to preceding and following stops with Opal data showing average 24-hour weekday demand of eight passengers (compared with 81 for the preceding stop and 10 for the following stop).

The alternative bus stop (220432) provides more direct access to Dulwich Hill Station, has sufficient space to accommodate growth in demand and shelter is currently provided by the adjacent shop awnings. Bus stop 220432 is within 130 metres of the southern part of the Dulwich Hill business district and has access to a pedestrian refuge (to aid crossing of Dudley Street) and a pedestrian crossing (to aid crossing of Wardell Road).

3.8.2 Increased walking distance to next stop

Submission number(s)
187

Issue description
A concern was raised that bus stop 220498 (#24) is convenient for people living in Riverside Crescent and beyond on both sides of Wardell Road. To force those people to then have to further walk up Wardell Road to the Dulwich Hill Station is quite a journey and may see some people abandoning public transport.
Response

The maximum increase in walking distance with the removal of bus stop 220498 (#24) would be about 210 metres, although for most customers it would be less. It is noted that bus stop 220499 is located near the Riverside Crescent / Wardell Road intersection and is accessible for customers near Wardell Road in the southern part of Marrickville / Dulwich Hill.

3.8.3 Alternative proposal

Submission number(s)

139

Issue description

A suggestion was made that bus stop 220432 be removed instead because at that location there are access difficulties for the bus due to illegal parking.

Response

Bus stop 220432 was not considered for removal because it provides direct access to Dulwich Hill Station and is highly utilised. Where necessary, the enforcement of parking restrictions will be considered further in consultation with the State Transit Authority and Inner West Council.

3.9 Route 412 – Formalisation of stop 220633, Permanent Avenue near Younger Avenue, Earlwood (#27)

A total of two community submissions were received regarding the proposed removal of bus stop 220633 at Location #27, neither of which were specifically against the change. Alternative proposals were the only issue raised in relation to this proposed change.

3.9.1 Alternative proposals

Submission number(s)

15, 161

Issue description

Suggestion that bus stop 220633 (#27) be relocated west to near the intersection with Younger Avenue to even spacing, compensate for the loss of stops 220645 (#29) and 220632 (#30) and improve access to Foord Avenue footbridge.

Request made for the removal of the bus stop near Dellwood Avenue and before Younger Avenue.

Response

While moving bus stop 220633 (#27) would create more even spacing between this stop, bus stop 220632 (#30) and bus stop 220634 (#26), it has not been proposed because the proposed spacing of about 430 metres between stop 220633 (#27) and stop 220631 is generally consistent the 400 metre spacing guideline as outlined within Sydney’s Bus Future and the cost of relocation is therefore not warranted. With the removal of bus stop 220632 (#30), customers using the Foord Avenue footbridge would have the option of using inbound bus stop 220631 on Dellwood Avenue (additional walking distance of about 160 metres) or bus stop 220633 (#27) (additional walking distance of about 175 metres).

It is unclear which bus stop is ‘near Dellwood Avenue and before Younger Avenue’. The outbound bus stop 220646 near Dellwood Avenue is being retained to maintain suitable spacing with the proposed removal of bus stop 220645 (#29).
3.10 Route 412 – Removal of stops 220648 and 220629, Earlwood Avenue near Flers Avenue, Earlwood (#31 and #32)

A total of ten community submissions were received regarding the proposed removal of bus stops 220648 and 220629 at Locations #31 and #32 respectively, eight of which were specifically against the change. The main issues raised were:

- Need for and justification of the proposed change given it provides access services and community facilities
- Increased walking distances and the impact this would have on the elderly and less mobile.

3.10.1 Scope / justification of removal

Submission number(s)
4, 5, 51, 89, 127, 171, 184, 196, 207

Issue description
The justification for the removal of bus stop 220648 (#31) and bus stop 220629 (#32) was questioned on the basis of the following:

- It would adversely affect access to the 412 bus service for people (including the elderly) who rely on it to access shops, medical services (including Royal Prince Alfred Hospital), places of worship and educational institutions
- The addition of parking at this location would be of no benefit, especially given most properties have driveways and garages
- People will need to catch another bus to the Earlwood shops to catch the 412 bus service from there. The trip would then involve catching two buses each way rather than the one and doubling the journey time.

Response
Section 3.1 of this report addresses the strategic need and justification for the proposal. It also considers the issues of bus stop accessibility and parking.

Table 2-1 in section 2.1 of the REF identified the particular bus service issues for these bus stops. Bus stop 220648 (#31) is located close to the preceding stop on Prince Edward Avenue (220647) (about 140 metres) and the next stop on Fricourt Avenue (220649) (about 220 metres). Bus stop 220629 (#32) is located close to the preceding stop on Fricourt Avenue (220628) (about 300 metres) and the next stop Prince Edward Avenue (220630) (about 140 metres). The 412 bus service can be accessed from the alternative bus stops identified above.

 Provision of parking is not an objective of the proposal. However, where bus stops are proposed for removal and there is an opportunity to reinstate parking, this has been proposed. Transport for NSW and Roads and Maritime would confirm with the council the parking restrictions to be applied following the relocation or removal of specific bus stops. Council is responsible for implementation of parking restrictions on local roads (where parking is most affected by the proposal) and Roads and Maritime is responsible for the implementation of parking restrictions on State roads.

3.10.2 Increased walking distance to next stop

Submission number(s)
171

Issue description
A concern was raised about the increased walking distances noting that some elderly people would not physically be able to walk to the alternative bus stops on Fricourt Avenue or Prince Edward Avenue. It was also noted that accessing the alternative bus stops on Prince Edward Avenue
(220647, 220630) would require a downhill walk which would increase the risk of falls and injury for older people.

Response
For outbound journeys, the maximum increased walking distance to access the previous stop on Prince Edward Avenue (220647) is about 140 metres and maximum increased walking distance to access the next stop on Fricourt Avenue (220649) is about 220 metres.

For inbound journeys the maximum increased walking distance to access the previous stop on Fricourt Avenue is about 300 metres and the maximum increased walking distance to access next stop Prince Edward Avenue is about 140 metres.

Grades along Earlwood Avenue are gentle to the south of bus stops 220648 (#31) and 220629 (#32) and moderate to the north. There are footpaths on both sides of the road which aid access.

3.10.3 Pedestrian safety
Submission number(s)
37

Issue description
Comments were made that bus stops 220648 (#31) and 220629 (#32) are the closest stops to a childcare centre on the corner of Earlwood Avenue and Guedecourt Avenue. These stops are used for preschool excursions to the sister centre in Dulwich Hill and other places. When carers are travelling with several toddlers, a short walk on a section of the street with high visibility is preferred. The next stop down the hill is on an awkward corner that reduces visibility of the traffic.

Response
Customers from the childcare centre on the corner of Earlwood Avenue and Guedecourt Avenue would be able to safely access the 412 service via the previous inbound stop (220628) on Fricourt Avenue, with an additional walking distance of about 130 metres. The additional walking distance would be on concrete footpaths and there are good sight distances on Fricourt Avenue that would facilitate safe crossing.

3.10.4 Alternative proposals
Submission number(s)
51, 89

Issue description
Comments were made that bus stops 220648 (#31) and 220629 (#32) are well used and that the bus stops on Prince Edward Avenue (220647, 220630) or Fricourt Avenue (220649, 220628) should be removed instead. It was also suggested that the bus stops on Prince Edward Avenue are in a less safe position.

Response
Bus stops 220648 (#31) and 220629 (#32) are proposed for removal because this would provide the best optimisation of bus stop spacing along this section of route 412.

In the preliminary assessment phase, Roads and Maritime’s Network and Safety team undertook an initial safety review of the bus stop locations identified for potential relocation / removal / extension, taking into consideration the following factors:

- Curvature of the road and sight distance
- Location in relation to traffic signals and pedestrian crossings
- Adjacent land uses
- Vegetation and street tree plantings
• Adjacent traffic or parking restrictions
• Distances to adjacent bus stops

The comments from the Network and Safety team were then considered via workshops in developing the proposal. Consultation with Transport for NSW and State Transit Authority also occurred to ensure the proposed changes are suitable with respect to the factors noted above.

3.11 Route 412 – Removal of stops 220652, 220625 and 220653, Wardell Road near Homer Street and Homer Street near Wardell Road and View Street, Earlwood (#35, #36 and #37)

A total of seven community submissions were received regarding the proposed removal of the bus stops 220652, 220625 and 220653 at Locations #35, #36 and #37 respectively, three of which were specifically against the change. The main issues raised were:

• Need for and justification of the proposed change
• The change seems motivated by improvements for traffic
• Increased walking distances and the impact this would have on the elderly and less mobile
• Pedestrian safety
• Alternative proposals

3.11.1 Scope / justification of removal

Submission number(s)
42, 48, 92, 180, 190, 206

Issue description
The justification for the removal of bus stops 220652 (#35) and 220625 (#36) was questioned on the basis of the following:

• These stops provide important access for people living in lower Wardell Road
• The removal of these stops and stop 220653 (#37) seems motivated by improvements to general road traffic
• There is a need for more services instead of bus stop removal
• Bus stop 220625 (#36) provides flexibility for customers because both the 412 and 423 services stop there
• The reliability of Opal data and its suitability for use in the development of the proposal is questionable.

Clarification was requested regarding the proposal with the suggestion that the map shows bus stop 220652 (#35) on the corner of Wardell Road and Homer Street, while the photo clearly shows the bus stop opposite Hamilton Avenue.

Response
Section 3.1 of this report addresses the strategic need and justification for the proposal. It also considers the issues of bus stop accessibility and parking.

Table 2-1 in section 2.1 of the REF identified the particular bus service issues for these bus stops. In response to the issues raised it is noted that:

• Bus stop 220652 (#35) is located close to the preceding stop (220651) near Watkin Avenue (about 170 metres) and the next stop (220654) (accounting for the removal of stop 220653 #37) near St James Avenue (about 305 metres). The resultant spacing would be about 475 metres
• Bus stop 220625 (#36) is located close to the preceding stop (220624) near Collingwood Avenue (about 130 metres) and the next stop (220626) near Hamilton Avenue (about 250 metres). The resultant spacing would be about 380 metres (for the 412 service) and 320 metres (for the 423 service).
• Improving traffic flow for general traffic was not a driver for the decision to remove the subject bus stops.
• Customers seeking the flexibility of using either the 412 or 423 service routes, bus stop 220624 is located about 130 metres to the west of 220625 (#36).
• Opal data is considered to be a useful tool to support decision making because it provides an accurate picture of the level and type of usage at each bus stop. Opal data represents the official bus use figures and the tap-on tap-off data provides the individual boarding and alighting at each stop. In this case a range of other considerations were also relevant, particularly the close spacing of bus stops, safety considerations (pedestrian and traffic) and adjacent land uses.

The maps and images in the REF and the February 2017 community update show the correct position of bus stop 220652 (#35). Bus stop 220651, opposite Hamilton Avenue, would not be affected by the proposal.

3.11.2 Increased walking distance to next stop

Submission number(s)
48, 92, 149

Issue description
Concerns were raised about increased walking distances with the proposed removal of bus stops 220652 (#35), 220625 (#36) and 220653 (#37) and the impact this would have on the elderly and people with a disability. Specific concerns were raised about the need for elderly / disabled people to walk up the steep grade of Wardell Road from bus stop 220651. Comment was made that 220625 (#36) and 220653 (#37) are used for accessing the adjacent shops.

Response
It is acknowledged that with the removal of these bus stops there would be additional walking distance for some people. Current users of bus stop 220652 (#35) can access either bus stop 220651 (opposite Hamilton Avenue) (about 100 metres) or bus stop 220654 (near St James Avenue) about 200 metres. For people needing to avoid the moderate grades on Wardell Road, bus stop 220654 may be the best alternative.

Bus stop 220624 is located about 130 metres west of bus stop 220625 (#36) while bus stop 220654 is located about 140 metres west of 220653 (#37). Both provide suitable access to the eastern part of the Earlwood business district.

3.11.3 Pedestrian safety

Submission number(s)
48, 92

Issue description
Concerns were raised about pedestrian safety with alternative stops requiring crossing at lights and the potential for accidents with people running for the bus.

Response
The traffic lights at the Wardell Road / Homer Street intersection provide a safe crossing option for bus users accessing stops further to the west on Homer Street.

In the preliminary assessment phase, Roads and Maritime’s Network and Safety team undertook an initial safety review of the bus stop locations identified for potential relocation / removal / extension, taking into consideration the following factors:

• Curvature of the road and sight distance
• Location in relation to traffic signals and pedestrian crossings
• Adjacent land uses
• Vegetation and street tree plantings
• Adjacent traffic or parking restrictions
• Distances to adjacent bus stops

The comments from the Network and Safety team were then considered via workshops in developing the proposal. Consultation with Transport for NSW and State Transit Authority also occurred to ensure the proposed changes are suitable with respect to the factors noted above.

A key consideration in the development of the proposal was to ensure (as far as practicable) that bus stops were adjusted and located in a manner that maintained or improved pedestrian safety. Furthermore, section 6.10 (Hazards and risks) of the REF recognises potential hazards or risks associated with the operation of the proposal including the potential for changed pedestrian behaviour associated with new bus stop locations (for example, crossing major roads away from signalised crossings). As detailed in section 6.10.2 (Environmental safeguards and management measures) of the REF, a further safety review of all new bus stop locations will be conducted during the design phase prior to implementation to identify whether any additional pedestrian safety measures are required.

3.11.4 Alternative proposals

Submission number(s)
38, 48

Issue description
It was suggested that consideration should be given to the removal of bus stop 220626 on Wardell Road instead of 220625 (#36). Concerns were raised about existing anti-social behaviour and driveway access difficulties associated with the current position of bus stop 220626.

Comment that a bus shelter should be installed at 220652 (#35) and that the removal of the traffic island near this bus stop would help ease congestion.

Response
The reasons for the proposed removal of bus stop 220625 (#36) are noted above in section 3.10.1. There is no proposal to remove bus stop 220626 because it is paired with bus stop 220651. Paired bus stops provide a better customer experience by allowing boarding and alighting to happen near each other, with the opposite stop clearly visible.

The reasons for the proposed removal of bus stop 220652 (#35) are provided above in section 3.11.1. As the bus stop is proposed for removal no shelter is proposed. The traffic calming devices on Wardell Road have not been identified as a specific issue for the on-time running of buses.

3.12 Route 412 – Removal of stop 2206123 and relocation of stop 2206129, Homer Street near Morgan Street, Earlwood (#38 and #39)

A total of four community submissions were received regarding the proposed removal of the bus stops at Locations #38 and #39, two of which were specifically against the change. The main issues raised were:

• Reasons for the proposed change
• Traffic and pedestrian safety
• Loss of parking.
3.12.1 Scope / justification of removal

Submission number(s)
180

Issue description
A concern was raised that the reasons for changes to bus stops 2206123 (#38) and 2206129 (#39) are unclear and whether it is related to bus stop pairing.

Response
Section 3.1 of this report addresses the strategic need and justification for the proposal. It also considers the issues of bus stop accessibility and parking.

Bus stop 2206123 (#38) is proposed for removal because it is located close to the preceding stop (2206122) near Schofield Avenue (about 140 metres) and the next stop (2206124) near Earlwood Primary School (about 190 metres). It also has a low number of customers with an average 24-hour weekday demand of two passengers), compared to ten for the previous stop (2206122) and six for the next stop (2206124).

Bus stop 2206129 (#39) is proposed for relocation because it is close to the preceding stop near Earlwood Primary School (2206128) (about 120 metres) and it can be relocated west to form a pair with bus stop 2206122. Paired bus stops provide a better customer experience by allowing boarding and alighting to happen near each other, with the opposite stop clearly visible.

3.12.2 Pedestrian and traffic safety

Submission number(s)
36, 65, 123

Issue description
A concern was raised about traffic safety and whether speeding drivers will have sufficient time to see the bus pulling out of the newly located bus stop 2206129 (#39). The benefits of the relocation are outweighed by the safety risk.

Concerns were also raised about pedestrian safety given the high incidence of speeding, the presence of a blind corner and the childcare centre and aged care facility adjacent to the proposed location for bus stop 2206129 (#39). Traffic calming would be needed if the relocation is to proceed.

Response
Enforcement of the 50 kilometre per hour speed limit is the responsibility of the NSW Police while decisions regarding further traffic calming are the responsibility of Canterbury-Bankstown Council. Comments regarding traffic calming at this location will be referred to the council for consideration.

In the preliminary assessment phase, Roads and Maritime’s Network and Safety team undertook an initial safety review of the bus stop locations identified for potential relocation / removal / extension, taking into consideration the following factors:

- Curvature of the road and sight distance
- Location in relation to traffic signals and pedestrian crossings
- Adjacent land uses
- Vegetation and street tree plantings
- Adjacent traffic or parking restrictions
- Distances to adjacent bus stops

Consultation with Transport for NSW and State Transit Authority also occurred to ensure the proposed changes are suitable with respect to the factors noted above.
A key consideration in the development of the proposal was to ensure (as far as practicable) that bus stops were adjusted and located in a manner that maintained or improved pedestrian safety. Furthermore, section 6.10 (Hazards and risks) of the REF recognises potential hazards or risks associated with the operation of the proposal including the potential for changed pedestrian behaviour associated with new bus stop locations (for example, crossing major roads away from signalised crossings). As detailed in section 6.10.2 (Environmental safeguards and management measures) of the REF, a further safety review of all new bus stop locations will be conducted during the design phase prior to implementation to identify whether any additional pedestrian safety measures are required.

3.12.3 Parking loss

Submission number(s)

36, 123

Issue description

Concern expressed about the loss of on-street parking which is already in short supply. The nearby child care centre (Earlwood Uniting Church Pre-School) has no off-street parking while the aged care facility (Uniting Care Pinewood Village) has only four spaces for residents of the twelve unit facility.

Comment was also made that the loss of parking would mean elderly people could no longer park outside their house and would need to walk further.

Response

Transport for NSW and Roads and Maritime would confirm with the council the parking restrictions to be applied following the relocation or removal of specific bus stops. Council is responsible for implementation of parking restrictions on local roads (where parking is most affected by the proposal) and Roads and Maritime is responsible for the implementation of parking restrictions on State roads.

The proposed relocation of bus stop 2206129 (#39) is expected to result in the loss of only two on-street car spaces outside 446 Homer Street, Earlwood, which would be offset by a gain of two car spaces at the current bus stop 2206129 (#39) location and a further two car spaces with the removal of bus stop 2206123 (#38). It is also noted that residential properties adjacent to the relocated bus stop 2206129 (#39) have driveways and provision for off-street parking.

3.13 Route 412 – Removal of stops 2206132 and 2206119, Homer Street near Braeside Crescent and Angus Street, Earlwood (#40 and #41)

A total of four community submissions were received regarding the proposed removal of the bus stops 2206132 and 2206119 at Locations #40 and #41 respectively, all of which were specifically against the change. The main issues raised were:

- Need for and justification of the proposed change noting that congestion is the source of delays
- Increased walking distances and the impact this would have on the elderly and less mobile.

3.13.1 Scope / justification of removal

Submission number(s)

149, 163, 172

Issue description

The justification for the removal of bus stops 2206132 (#40) and 2206119 (#41) was questioned on the basis that the real issue is the volume of traffic using Homer Street to access the M5 Motorway.
Concern was also expressed about the impact the removal would have on young people, the elderly and people with a disability.

Response

Section 3.1 of this report addresses the strategic need and justification for the proposal. It also considers the issues of bus stop accessibility and parking.

Table 2-1 in section 2.1 of the REF identified the particular bus service issues for these bus stops. Bus stop 2206132 (#40) is located close to the preceding stop (2206131) near Woodlawn Avenue (about 200 metres) and the next stop (2206133) near Bexley Road (about 210 metres). This stop also has a low number of customers relative to adjacent stops with an average 24-hour weekday demand of eight passengers (compared with 17 for the previous stop and ten for the following stop).

Bus stop 220119 (#41) is located close to the preceding stop near Bexley Road (2206118) (about 175 metres) and the next stop near Malley Avenue (2206120) (about 180 metres). This stop also has low number of customers relative to adjacent stops with an average 24-hour weekday demand of nine passengers (compared with 20 for the previous stop and 16 for the following stop).

The potential impacts the removal of these bus stops could have on young people, the elderly and people with a disability are considered below in section 3.13.2.

While it is acknowledged that the road network can be highly congested resulting in delays and poor reliability for some bus services, the proposal would still improve bus reliability by reducing common sources of delay at this location. Numerous bus stops positioned closely together multiply the delays associated with a bus leaving the traffic stream, allowing customers to board / alight and then waiting to re-enter the traffic stream. These delays occur even when the number of customers using a bus stop is low relative to adjacent stops along the route.

3.13.2 Increased walking distance to next stop

Submission number(s)
85, 149, 163, 172

Issue description
Concern was expressed about increased walking distances following the removal of bus stops 2206132 (#40) and 2206119 (#41) and the impact this would have on elderly people and their independence. Specific comment was made that accessing the alternative bus stops would involve walking up a steep incline to the next closest stops near Malley Avenue (2206120, 2206131), or walking down a steep decline from Woodlawn Avenue.

Response
It is acknowledged that some users would have to walk further with the proposed removal of bus stops 2206132 (#40) and 2206119 (#41), however the resulting bus stop spacing (410 metres and 350 metres respectively) is consistent with the 400 metre spacing guideline.

The maximum increased walking distance for users of bus stop 2206132 (#40) would be about 200 metres (to access bus stop 2206133 near Bexley Road). This would involve negotiating a moderate slope on concrete footpaths.

The maximum increased walking distance for users of bus stop 2206119 (#41) would be about 160 metres (to access bus stop 2206118 near Bexley Road). This would involve negotiating a moderate slope on concrete footpaths.
3.14 Route 412 – Extension of stop 220614, Bexley Road near William Street, Earlwood (#45)

A total of three community submissions were received regarding the proposed extension of bus stop 220614 at Location #45, two of which were specifically against the change. The main issue raised was impacts on access to adjacent businesses.

3.14.1 Impact on business

Submission number(s)
14, 197

Issue description
Concerns were raised about the impact the extension of bus stop 220614 (#45) would have on adjacent businesses. A specific concern was raised about access to loading facilities and driveway access for customers.

Response
After consideration of submissions, the design of the proposed bus stop extension at Location #45 has been refined (refer to Chapter 5 Changes to the proposal). The Bus Zone would no longer extend across the loading dock access to 214 William Street or the driveway access to 142 Bexley Road. A new Loading Zone (9:30am to 3.00pm, Monday to Friday) is now proposed outside 142 Bexley Road.

3.15 Route 422 – Relocation of stop 220561, Princes Highway near Gertrude Street, Wolli Creek (#49)

3.15.1 Support

Submission number(s)
191

Issue description
Support expressed for the relocation including the provision of a shelter.

Response
Support noted.

3.16 Route 422 – Removal of stops 220567 and 220568, West Botany Street near Marsh Street, Arncliffe (#50 and #51)

3.16.1 Scope / justification of removal

Submission number(s)
191

Issue description
Comments were made acknowledging that bus stops 220567 (#50) and 220568 (#51) are only a short distance from the Wickham Street bus stops (220566, 220569) but, due to the heavy traffic on West Botany Street and the problems accessing the Wickham Street bus stops via the traffic signals, these bus stops should be retained.
Response

Bus stops 220567 (#50) and 220568 (#51) have a low number of customers boarding and alighting relative to preceding and following stops. Bus stop 220567 (#50) has an average 24-hour weekday demand of six passengers, compared with twelve for the previous stop (220566) and eleven for the following stop (220562) while bus stop 220568 (#51) has an average 24-hour weekday demand of three passengers, compared with 15 for the previous stop (220563) and ten for the following stop (220569).

It is considered that suitable access is available to alternative bus stops either near Wickham Street or further north on West Botany Street and it is noted that pedestrian crossing facilities are available at the West Botany Street / Marsh Street traffic lights.

3.17 Route 422 – Removal of stops 221673 and 221662, Bryant Street near Lennox Street and Farr Street, Rockdale (#52 and #53)

A total of two community submissions were received regarding the proposed removal of bus stops 221673 and 221662 at Locations #52 and #53 respectively, both of which expressed general support. An alternative proposal was also suggested.

3.17.1 General support

Submission number(s)

98, 191

Issue description

General support expressed for the removal of bus stops 221673 (#52) and 221662 (#53).

Response

Support noted.

3.17.2 Alternative proposal

Submission number(s)

98

Issue description

Comment that the preceding bus stop (respondent’s reference assumed it to be stop 221658) be removed and bus stop 221662 (#53) be retained, noting existing safety issues with stop 221658 being located close to the West Botany Street / Bryant Street intersection. Further comment that bus stop 221673 (#52) should be retained and bus stop 221657 should be removed instead. These changes would improve safety, traffic flow and be better situated for access.

Response

Current users of bus stops 221673 (#52) and 221662 (#53) would have easy access to bus stops 221672 and 221663 with maximum additional walking distances of 180 metres and 140 metres respectively.

In the preliminary assessment phase, Roads and Maritime’s Network and Safety team undertook an initial safety review of the bus stop locations identified for potential relocation / removal / extension, taking into consideration the following factors:

- Curvature of the road and sight distance
- Location in relation to traffic signals and pedestrian crossings
- Adjacent land uses
- Vegetation and street tree plantings
- Adjacent traffic or parking restrictions
• Distances to adjacent bus stops.

The comments from the Network and Safety team were then considered via workshops in developing the proposal. Consultation with Transport for NSW and State Transit Authority also occurred to ensure the proposed changes are suitable with respect to the factors noted above. A specific need to remove bus stops 221657 and 221658 for safety reasons was not identified.

3.18 Route 422 – Removal of stops 221664 and 221670, Bryant Street near George Street and Kent Street, Rockdale (#54 and #55)

A total of three community submissions were received regarding the proposed removal of the bus stop 221664 and 221670 at Locations #54 and #55 respectively, one of which was specifically against the proposed change and two of which expressed general support. The main issue raised was access for students and staff of Rockdale Primary School.

3.18.1 Scope / justification of removal

Submission number(s)
7

Issue description
A concern was raised about the removal of bus stops 221664 (#54) and 221670 (#55) suggesting it would affect students of Rockdale Primary School.

Response
Students and staff of Rockdale Primary School who use the 422 service would still have easy access to bus stops 221663 and 221672, with an additional walking distance of less than 100 metres. Prior to implementation of the proposed change at Location #54 and #55, the potential need to extend the current School Zone to include bus stop 221663 will be reviewed.

3.18.2 General support

Submission number(s)
98, 191

Issue description
General support expressed for the removal of bus stops 221664 (#54) and 221670 (#55).

Response
Support noted.

3.19 Route 422 – Removal of stops 221648 and 2217137, Princes Highway near Chandler Street and Harrow Road, Kogarah (#57 and #58)

A total of three community submissions were received regarding the proposed removal of bus stops 221648 and 2217137 at Locations #57 and #58 respectively, all of which were specifically against the proposed change. The main issue raised was access for elderly and less mobile people including supported employees of The Intellectual Disability Foundation of St George.

3.19.1 Scope / justification of removal

Submission number(s)
10, 191, 134
Issue description
The justification for the removal of bus stops 221648 (#57) and 2217137 (#58) was questioned on the basis that the loss of these stops would affect access for the elderly and the disabled. Specific concerns were also raised by The Intellectual Disability Foundation of St George regarding access for supported employees.

Response
Following review of submissions for these bus stops, it was identified that they provide an essential service for supported employees of the Intellectual Disability Foundation of St. George, and increasing the walking distance to the next stops would impact on those with restricted mobility. It is now proposed that bus stops 221648 (#57) and 2217137 (#58) be retained (refer to Chapter 5 Changes to the proposal).

3.20 Route 423 – Relocation of stop 220699, William Street near Woolcott Street, Earlwood (#68)
A total of eleven community submissions were received regarding the proposed relocation of bus stop 220699 at Location #68, ten of which were specifically against the proposed change. The main issues raised were:

- Need for and justification of the proposed change noting increased demand and that it is not clear how the change will improve reliability
- Traffic and pedestrian safety
- Loss of parking
- Environmental impacts (trees, air quality and noise).

3.20.1 Scope / justification of relocation
Submission number(s)
101, 141, 148, 154, 173, 175, 177, 178, 201

Issue description
The justification for the removal of bus stop 220699 (#68) was questioned noting the following:

- There is already another bus stop within 300 metres of the proposed relocated bus stop.
- It is unclear how the change will benefit bus services reliability, with the bus running on-time at this location. The delays start at Victoria Street, Marrickville
- There will be increased demand associated with a new apartment building adjacent to the current bus stop location
- Moving the bus stop would mean moving the shelter to an inconvenient position

It was also noted that while moving the bus stop to the departure side of the intersection is the stated reason for the change, there are many other stops along the route that are located on the approach to traffic lights.

One submission queried whether a development application had been lodged with Council.

Response
Section 3.1 of this report addresses the strategic need and justification for the proposal. It also considers the issues of bus stop accessibility and parking.

The current position of bus stop 220699 (#68) on the approach to the Woolcott Street intersection is less desirable as buses may not benefit from PTIPS (which extends the green time when a bus is approaching traffic signals). The new location would address this issue but also improve safety by removing the interface between the stopped bus and the general traffic turning left onto Woolcott Street. While changes at individual locations may deliver small benefits, the cumulative
effect of changes across the whole route is expected to deliver an important reliability improvement.

Bus stop 220699 (#68) is currently located about 220 metres from the previous stop (220698) and about 370 metres from the next bus stop (2206100). The proposed relocation of bus stop 220699 (#68) would result in a more even spacing of bus stops along this part of the 423 route (previous stop (220698) about 310 metres and next stop (2206100) about 300 metres). More even spacing of bus stops is preferred for accessibility, and the new stop location will still be accessible for current and future bus users.

The relocation of bus stop 220699 (#68) would result in the loss of one Bottle Brush tree. Section 7.2 of the REF includes a safeguard (VIS1), which commits to exploring replacement tree plantings or otherwise mitigating streetscape impacts in consultation with Inner West Council.

The proposal is being assessed under Part 5 of the EP&A Act and does not require submission of a development application to Council. The assessment and approval process is explained in Chapter 4 (Statutory and planning framework) of the REF.

### 3.20.2 Pedestrian and traffic safety

#### Submission number(s)

125, 148, 154, 173, 175, 177, 178, 201

#### Issue description

Concerns were raised about safety on this part of William Street, specifically noting:

- It is dangerous with cars observed speeding up the hill in the left lane to prior to the merge after the Woolcott Street intersection. Increasing the length of the open left lane will encourage this to extend past driveways creating a dangerous situation for those properties and for people waiting at the relocated bus stop. The current on-street car parking provides a buffer.
- There is a safety risk associated with people needing to cross at the Woolcott Street traffic lights while a green left turn arrow is in operation.
- The presence of the relocated bus stop will make it more difficult for adjacent residents to turn in and out of their driveways.

#### Response

In the preliminary assessment phase, Roads and Maritime’s Network and Safety team undertook an initial safety review of the bus stop locations identified for potential relocation / removal / extension, taking into consideration the following factors:

- Curvature of the road and sight distance
- Location in relation to traffic signals and pedestrian crossings
- Adjacent land uses
- Vegetation and street tree plantings
- Adjacent traffic or parking restrictions
- Distances to adjacent bus stops

The comments from the Network and Safety team were then considered via workshops in developing the proposal. Consultation with Transport for NSW and State Transit Authority also occurred to ensure the proposed changes are suitable with respect to the factors noted above.

A key consideration in the development of the proposal was to ensure (as far as practicable) that bus stops were adjusted and located in a manner that maintained or improved pedestrian safety. Furthermore, section 6.10 (Hazards and risks) of the REF recognises potential hazards or risks associated with the operation of the proposal including the potential for changed pedestrian behaviour associated with new bus stop locations (for example, crossing major roads away from signalised crossings). As detailed in section 6.10.2 (Environmental safeguards and management measures) of the REF, a further safety review of all new bus stop locations will be conducted.
during the design phase prior to implementation to identify whether any additional pedestrian safety measures are required.

At this location traffic lights provide a safe way to cross Woolcott Street.

### 3.20.3 Parking loss

**Submission number(s)**

125, 141, 148, 201

**Issue description**

Comment that the relocation of bus stop 220699 (#68) would result in the loss of at least three car spaces rather than two. This loss of parking would further limit available parking and affect adjacent residents who prefer to park on the street due to safety issues associated with reversing out of their driveways.

**Response**

The design at location #68 has been reviewed and it is agreed that a total of three spaces would need to be removed. While the proposal would result in the loss of three car spaces at the new bus stop 220699 (#68), this represents a small loss of parking in the context of the overall parking supply in the locality. It is acknowledged that some residents using on-street parking on William Street may have to walk a short distance further between their residence and the first available car space.

### 3.20.4 Environmental and amenity impacts

**Submission number(s)**

141, 154, 202

**Issue description**

Concerns were raised about the potential loss of street trees and potential operational environmental impacts associated with the proposal in this location, in particular noise and air quality.

**Response**

The potential environmental impacts associated with the proposal were considered in Chapter 6 (Environmental assessment) of the REF which was publicly exhibited between 8 February 2017 and 8 March 2017 (refer specifically to section 6.4 for noise and section 6.8 for air quality in the REF).

At the site of the relocated bus stop some short term static noise associated with pick-up and departure of buses, and waiting customers at bus stops, may be noticeable. This would be periodic as per the bus timetable and would be experienced in the context of existing road traffic noise from other vehicles. The same static noise impacts would be eliminated at the current bus stop location. Buses would not be idling for extended periods at relocated bus stop.

The proposal would not alter traffic composition or volumes and therefore operational air quality impacts are not expected.

### 3.20.5 Stakeholder and community consultation

**Submission number(s)**

141, 154, 173, 175, 177, 178
Issue description
Concerns were raised about the consultation process, noting that door knocking occurred during business hours on a weekday. Many people were not aware of the proposal and nothing was left in the mailbox.

Response
A letterbox drop was carried out to properties adjacent to the routes where changes are proposed. Roads and Maritime acknowledge that the level of engagement on this project suffered as a result of technical and procedural issues experienced during the consultation period. Roads and Maritime will take your feedback on board as learnings to improve consultation procedures in the future.

3.20.6 Project cost

Submission number(s)
141, 154, 173, 175, 177, 178

Issue description
The cost of the proposed change was requested and concern was expressed that taxpayers would need to pay for something they do not want.

Response
The proposed change is part of the $260 million ten year Bus Priority Infrastructure Program which includes a range of measures that would deliver important improvements to bus services reliability (which has been raised as a concern by the public), including:

- Red bus lanes
- Bus priority at traffic lights
- More efficient bus stop placement.

The Bus Priority Infrastructure Program is consistent with Sydney’s Bus Future (Transport for NSW, 2013), which aims to provide:

- A simpler bus network that is easy for customers to understand and use. It makes routes more direct, reduces duplication and increases the number of locations which customers can travel between by bus
- A faster bus network that gets customers where they want to go in the shortest amount of time. It is reliable and delivers frequent services that connect seamlessly with other buses, trains, light rail and ferries
- A better bus network that is more efficient, convenient and cost-effective with features that include a modern, comfortable fleet, real time customer information and world-class customer service.

3.20.7 Alternative proposals

Submission number(s)
154, 173, 175, 177, 178

Issue description
Suggestion that bus stop 220699 (#68) should be removed completely rather than relocating it.

Response
The reasons for relocating bus stop 220699 (#68) are explained above in section 3.20.1. If bus stop 220699 (#68) were to be removed, bus stop 2206114 would be left without a paired stop. Paired bus stops provide a better customer experience by allowing boarding and alighting to happen near each other, with the opposite stop clearly visible.
3.21 Route 423 – Extension of bus stop 2206117, William Street near Bexley Road, Earlwood (#70)

One submission was received in relation to the proposed extension of bus stop 2206117, William Street near Bexley Road, Earlwood (#70). The submission objected to the change and raised concerns about business impacts, air quality and noise. An alternative to the proposed change was also suggested.

3.21.1 Impacts on business

Submission number(s)
108

Issue description
A concern was raised that the loss of one car space for the extension of bus stop 2206117 (#70) would affect the adjacent businesses, noting that the current space is convenient for customers. A comment was also made that the extended bus stop would also block the driveway for the adjacent residential building and funeral business.

Response
The loss of one car space at Location #70 may have a small impact on convenience of access to adjacent businesses, however it is noted that alternative timed restricted on-street parking is positioned immediately to the east.

As is currently the case, buses would not dwell at stop 2206117 for extended periods and are therefore not expected to adversely affect access to adjacent properties. At worst, there would be short delays while residents / visitors wait for a bus to depart the stop.

3.21.2 Environmental and amenity impacts

Submission number(s)
108

Issue description
A concern was raised about bus fumes and loud noise in front of the adjacent shops and that this will become worse with the proposed changes.

Response
The extension of bus stop 2206117 (#70) by five metres is not expected to result in any change to noise and air quality in the local area.

Some short term static noise would be associated with the existing pick-up and departure of buses, and waiting customers. This is periodic as per the bus timetable and is experienced in the context of existing road traffic noise from other vehicles. Buses would not be idling at bus stop 2206117 (#70) for extended periods.

The proposal would not alter traffic composition or volumes and therefore operational air quality impacts are not expected.

3.21.3 Alternative proposal

Submission number(s)
108
**Issue description**

Suggestion that bus stop 2206117 (#70) would be better positioned before the shops further away from the traffic lights at the William Street / Bexley Road intersection.

**Response**

Relocation of bus stop 2206117 (#70) east beyond the shops is not proposed because it would then be too close (about 200 metres) from stop 2206116. It would also split the current pairing with bus stop 220696 (#69). Paired bus stops provide a better customer experience by allowing boarding and alighting to happen near each other, with the opposite stop clearly visible.

### 3.22 Route 423 – Removal of stops 220873 and 220872, William Street near Miller Street and Ferrier Parade, Kingsgrove and Clemton Parade (#71 and #72)

A total of two community submissions were received regarding the proposed removal of the bus stops 220873 and 220872 at Locations #71 and #72 respectively, one of which was specifically against the proposed change while the other was in support.

#### 3.22.1 Scope / justification of removal

**Submission number(s)**

203

**Issue description**

A comment was made that traffic flow is the source of the problem rather than bus stops. The proposed removal of bus stops 220873 (#71) and 220872 (#72) would affect access for elderly people.

**Response**

With the removal of bus stops 220873 (#71) and 220872 (#72), the maximum increase in walking distance would be about 180 metres (to bus stops 220874 and 220871 near Hilltop Street). The gradient is gentle over this additional distance and concrete footpaths are provided on both sides of William Street.

While it is acknowledged that the road network can be highly congested resulting in delays and poor reliability for some bus services, the proposal would still improve bus reliability by reducing common sources of delay. A key issue are the delays associated with servicing bus stops that are positioned too close together and which are underutilised relative to other adjacent stops along the route. Numerous bus stops positioned closely together multiply the delays associated with buses leaving the traffic stream, allowing customers to board / alight and then waiting to re-enter the traffic stream.

#### 3.22.2 General support

**Submission number(s)**

94

**Issue description**

A comment was made that the proposal has been reviewed and that there are no issues with removal of bus stops 220873 (#71) and 220872 (#72).

**Response**

Noted.
3.23 Route 423 – Removal of stops 220870 and 220875, William Street near Hillsdale Avenue and Panorama Road, Kingsgrove (#73 and #74)

A total of twelve community submissions were received regarding the proposed removal of bus stops 220870 and 220875 at Locations #73 and #74 respectively, ten of which were specifically against the proposed change. The main issues raised were:

- Need for and justification of the proposed change noting that traffic congestion is the cause of delays and that public transport use could be discouraged as a result of the changes
- Increased walking distances and the impact this would have on the elderly and less mobile.
- Traffic safety
- Alternative proposals.

3.23.1 Scope / justification of removal

Submission number(s)

62, 63, 66, 179, 203, 205

Issue description

The justification for the removal of bus stops 220870 (#73) and 220875 (#74) was questioned on the basis that it operates well and does not affect the on-time running of buses. It was also noted that:

- The additional parking is unnecessary
- Removal of the stops would affect access for the elderly and school children
- Traffic congestion is the cause of delays rather than bus stops
- Removal of these stops could discourage public transport use
- Buses leaving the Kingsgrove depot on time is an issue.

Response

Section 3.1 of this report addresses the strategic need and justification for the proposal. It also considers the issues of bus stop accessibility and parking.

Table 2-3 in section 2.1 of the REF identified the particular bus service issues for these bus stops. Bus stop 220875 (#74) is located close to the preceding stop 220874 near Hilltop Street (about 350 metres) and the next stop 220876 near Shackel Avenue (about 160 metres). The number of customers boarding and alighting at this stop is also low relative to the preceding and following stops (220874, 220876) with an average 24-hour weekday demand of 21 passengers (compared with 55 for the previous bus stop and 31 for the following bus stop).

Bus stop 220870 (#73) is located close to the preceding stop 220869 near Kingsgrove Road (about 240 metres) and the next stop 220871 near Tasker Avenue (about 275 metres). The number of customers boarding and alighting at this stop is also low relative to the preceding and following stops (220869, 220871) with an average 24-hour weekday demand of 23 passengers (compared with 31 for the previous bus stop and 47 for the following bus stop).

While it is acknowledged that the road network can be highly congested resulting in delays and poor reliability for some bus services, the proposal would still improve bus reliability by reducing common sources of delay. A key issue is delays associated with servicing bus stops that are positioned too close together and which are underutilised. Numerous bus stops positioned closely together multiply the delays associated with buses leaving the traffic stream, allowing customers to board / alight and then waiting to re-enter the traffic stream.

Improvements to the reliability of bus services are expected to encourage public transport use. While for some people optimisation of bus stop spacing would mean additional walking distance and reduced convenience, the proposed changes would still mean the bus services using the corridor would be accessible and remain an attractive transport option.
Increased walking distances are considered below in section 3.23.2.

### 3.23.2 Increased walking distance to next stop

#### Submission number(s)

9, 57, 58, 59, 62, 66

#### Issue description

Concerns were raised about the increase in walking distance to adjacent stops associated with the proposed removal of bus stops 220870 (#73) and 220875 (#74) noting the following issues:

- Impact on people with a disability
- Impact on elderly (including impact on their independence)
- Alternative transport options are unaffordable
- Impact on students
- Impact on users accessing child care facilities.

#### Response

While the spacing between stops has increased to greater than 400 metres, the proposed stop locations in this area still maintain a walkable catchment (ie stops within a 400 metre radius or a five minute walk) consistent with the *Improving Transport Choice and Sydney’s Bus Future* guidelines (refer to Section 3.1 for further information about bus stop accessibility).

It is acknowledged that the removal of bus stops 220870 (#73) and 220875 (#74) may inconvenience some people by increasing walking distances, however this consideration needs to be balanced against the benefits of improving on-time running on this route. With the removal of bus stops 220870 (#73) and 220875 (#74) the maximum additional walking distance to adjacent bus stops near Kingsgrove Road (220869 and 220876) would be about 220 metres and 160 metres respectively. It is noted that the grades are moderate on this section of William Street and concreted footpaths are provided on both sides of the street.

### 3.23.3 Traffic and pedestrian safety

#### Submission number(s)

62

#### Issue description

A concern was raised that the reintroduction of car spaces would affect safety noting that during peak hours traffic is very busy on the corner of William Street and Hillside Avenue. Prior to the removal of parking from areas of William Road in 2015, motor vehicles parked outside 319 William Street would cause major delays and many near misses to both motor vehicles and pedestrians.

#### Response

Transport for NSW and Roads and Maritime would confirm with the council the parking restrictions to be applied following the relocation or removal of specific bus stops. Council is responsible for implementation of parking restrictions on local roads (where parking is most affected by the proposal) and Roads and Maritime is responsible for the implementation of parking restrictions on State roads.

In the preliminary assessment phase, Roads and Maritime’s Network and Safety team undertook an initial safety review of the bus stop locations identified for potential relocation / removal / extension, taking into consideration the following factors:

- Curvature of the road and sight distance
- Location in relation to traffic signals and pedestrian crossings
- Adjacent land uses
- Vegetation and street tree plantings
• Adjacent traffic or parking restrictions
• Distances to adjacent bus stops

The comments from the Network and Safety team were then considered via workshops in developing the proposal. Consultation with Transport for NSW and State Transit Authority also occurred to ensure the proposed changes are suitable with respect to the factors noted above.

A key consideration in the development of the proposal was to ensure (as far as practicable) that bus stops were adjusted and located in a manner that maintained or improved pedestrian safety. Furthermore, section 6.10 (Hazards and risks) of the REF recognises potential hazards or risks associated with the operation of the proposal including the potential for changed pedestrian behaviour associated with new bus stop locations (for example, crossing major roads away from signalised crossings). As detailed in section 6.10.2 (Environmental safeguards and management measures) of the REF, a further safety review of all new bus stop locations will be conducted during the design phase prior to implementation to identify whether any additional pedestrian safety measures are required.

3.23.4 General support

Submission number(s)
94

Issue description
A comment made that the proposal has been reviewed and that there are no issues with the proposed removal of bus stops 220870 (#73) and 220875 (#74).

Response
Noted.

3.23.5 Alternative proposals

Submission number(s)
62, 66, 68

Issue description
The following alternative proposals were raised in submissions for bus stops 220870 (#73) and 220875 (#74):

• Two lanes each way on William Street and Homer Street should be reintroduced, removing traffic slowing devices and implementing peak hour clearways
• Rather than removing bus stops 220870 (#73) and 220875 (#74), stopping at these bus stops could be limited during peak times
• A No Stopping zone should be implemented instead of on-street parking. This would not hinder the flow of traffic, especially vehicles turning from Hillside Avenue into William Street and right into Marcella Street. Vehicles travelling along William Street would be able to overtake these vehicles in the left lane without any problems being obstructed by parked vehicles.

Response
Transport for NSW and Roads and Maritime would confirm with the council the parking restrictions to be applied following the relocation or removal of specific bus stops. Council is responsible for implementation of parking restrictions on local roads (where parking is most affected by the proposal) and Roads and Maritime is responsible for the implementation of parking restrictions on State roads.

Changes to local area traffic management on William Street are the responsibility of Canterbury-Bankstown Council and is beyond the scope of the current proposal.
3.24  Route 423 – Removal of stop 2208116, Kingsgrove Road near Pacific Street, Kingsgrove (#75)

A total of two community submissions were received regarding the proposed removal of the bus stop 2208116 at Location #75, neither of which was specifically against the proposed change. The main issue raised was the potential for increased demand associated with new development in the area.

3.24.1  Scope / justification of removal

Submission number(s)

190

Issue description

A comment was made that the aerial photograph presented in the public display does not show the recent development that has occurred in the local area which will create demand for the bus services at this location.

Response

The new development referred to in the submission is a Bunnings Warehouse and this is shown in Figure 2-19 in Chapter 2 (Need and options considered) of the REF. Motor vehicles are likely to be the dominant form of transport to this type of development, however alternative access is still available via the nearby bus stop (2208117) on Omnibus Road.

3.24.2  Alternative proposal

Submission number(s)

107

Issue description

A comment was made that this length of Kingsgrove Road provides access to the M5 Motorway and should be designated No Stopping.

Response

Broader changes to parking restrictions are beyond the scope of the current proposal. It is noted that No Parking restrictions currently apply along this section of Kingsgrove Road in peak periods. These restrictions would apply at the location of bus stop 2208116 (#75) once removed.

Transport for NSW and Roads and Maritime would confirm with the council the parking restrictions to be applied following the relocation or removal of specific bus stops. Council is responsible for implementation of parking restrictions on local roads (where parking is most affected by the proposal) and Roads and Maritime is responsible for the implementation of parking restrictions on State roads.

3.25  Route 426 – Relocation of stop 220480, Marrickville Road near Livingstone Road, Marrickville (#79)

A total of three community submissions were received regarding the proposed relocation of bus stop 220480 at Location #79, one of which was specifically against the proposed change and one of which was in support. The main issue raised was the need for clarification about nature of the proposed change.
3.25.1 Scope / justification of removal

Submission number(s)

145

Issue description

Clarification was sought regarding the changes to bus stop 220480 (#79).

Response

The proposal included relocation of Route 426 bus stop 220480 (#79) about 60 metres south-east to the departure side of the Livingstone Road intersection. The proposal also included removal of bus stops 220487 (#80) and 220430 (#81) located on Marrickville Road, near Fletcher Street and Petersham Road respectively.

Following a review of the submissions for these bus stops, it was recognised that bus stops 220487 (#80) and 220430 (#81) should be retained given their relatively high levels of usage and proximity to active land uses associated with the Marrickville town centre. Without the removal of bus stop 220430 (#81), the relocation of bus stop 220480 (#79) would have resulted in unsuitable spacing (about 100 metres) and is therefore no longer proposed (refer to Chapter 5 (Changes to the proposal) within this report).

3.25.2 Environmental and amenity impacts

Submission number(s)

30

Issue description

A concern was raised about the impacts on safety and amenity associated with birds nesting in trees overhanging the proposed location for bus stop 220480 (#79).

Response

Relocation of bus stop 220480 (#79) is no longer proposed. Refer above to section 3.25.1.

3.25.3 General support

Submission number(s)

176

Issue description

Support was expressed for the proposed relocation of bus stop 220480 (#79) noting positive impacts on travel time and its proximity to a future library in this location.

Response

Support noted, however relocation of bus stop 220480 (#79) is no longer proposed. Refer above to section 3.25.1.

3.26 Route 426 – Removal of stops 220487 and 220430, Marrickville Road near Fletcher Street and Petersham Road, Marrickville (#80 and #81)

A total of eleven community submissions were received regarding the proposed removal of bus stops 220487 and 220430 at Locations #80 and #81 respectively, eight of which were specifically against the proposed change and one of which was in support. The main issue raised were:
• Need for and justification of the proposed change noting that these stops are close to community facilities and are likely to experience increased demand
• Difficulty in finding alternatives bus stops
• Alternative proposals.

3.26.1 Scope / justification of removal

Submission number(s)
30, 31, 80, 113, 114, 135, 185, 188, 214

Issue description
Concerns were raised about the justification for removal of bus stops 220487 (#80) and 220430 (#81) noting that these stops are well patronised and do not appear to affect the on-time running of buses. Various other issues were noted including:

• Impact on users accessing Marrickville shops
• Impact on users accessing important community facilities such as the Marrickville Town Hall and Library
• Likelihood of increased demand given the proposed new library and community hub
• Impact on elderly people wishing to access the western end of the Marrickville business district
• Proposal will increase traffic congestion as people will rely on cars
• Recent installation of shelters
• Spacing of bus stops beyond the guideline 400 metres
• Traffic congestion, which is the cause of unreliable bus services

Response
Following a review of the submissions for these bus stops, it was recognised that bus stops 220487 (#80) and 220430 (#81) should be retained given their relatively high levels of usage and proximity to active land uses associated with the Marrickville town centre. Removal of these bus stops is therefore no longer proposed (refer to Chapter 5 (Changes to the proposal) within this report).

3.26.2 Way-finding

Submission number(s)
29

Issue description
It was raised that changes could cause the (mostly elderly) passengers to not be able to find their bus stop and be left sweltering in the heat and confused.

Response
Removal of bus stops 220487 (#80) and 220430 (#81) is no longer proposed. Refer above to section 3.26.1.

3.26.3 General support

Submission number(s)
176

Issue description
Support was expressed noting the proximity of bus stop 220487 (#80) to the next stop and the positive impacts it would have on travel time.
Response
Support noted, however removal of bus stops 220487 (#80) and 220430 (#81) is no longer proposed. Refer above to section 3.26.1.

3.26.4 Alternative proposal

Submission number(s)
31

Issue description
A suggestion was made that if removal of this stop is necessary, relocate bus stop 220480 (#79) closer to the corner of Marrickville and Illawarra Road.

Response
Suggestion noted, however removal of bus stops 220487 (#80) and 220430 (#81) is no longer proposed. Refer above to section 3.26.1.

3.27 Route 428 – Removal of stop 220444, Addison Road near East Street, Marrickville (#82)

A total of seven community submissions were received regarding the proposed removal of bus stop 220444 at Location #82, two of which were specifically against the proposed change and one of which was in support. The main issues raised were:

- Need for and justification of the proposed change noting that the stop is sheltered, well used and that traffic congestion is the cause of delays
- Increased walking distances and the impact this would have on the elderly and less mobile
- Alternative proposals.

3.27.1 Scope / justification of removal

Submission number(s)
19, 22, 81, 166, 214

Issue description
The justification for the removal of bus stop 220444 (#82) was questioned noting the following:

- It is a sheltered stop that is well used and that removing this stop would result in overcrowding at other nearby stops, particularly on market days.
- Traffic congestion is the cause of unreliable bus services and that reliability issues arise well before this location and that removing the stop would discourage the use of public transport.
- Bus stop 220444 (#82) is one of the few properly shaded stops in Addison Road. Both of the remaining bus stops nearest to the "Addison near Bright" stop are located in full sun with inadequate shelters and the metal seats are curved, uncomfortable and heat up in the sun.

There was a query as to whether the proposed removal of bus stop is related to a proposed bicycle route along Addison Road.

Response
Section 3.1 of this report addresses the strategic need and justification for the proposal. It also considers the issues of bus stop accessibility and parking.

Table 2-5 in section 2.1 of the REF identified the particular bus service issues for this bus stop. Bus stop 220444 (#82) is located close to the preceding stop (220443) near William Street (about 315 metres) and the next stop (220445) near Agar Street (about 190 metres). The number of customers boarding and alighting at this bus stop is also low relative to preceding (220443) and
following stops (220445) with an average 24-hour weekday demand of 41 passengers (compared with 117 for the previous stop and 107 for the following stop).

Bus stop 220444 (#82) is also not paired with an outbound stop. Paired bus stops provide a better customer experience by allowing boarding and alighting to happen near each other, with the opposite stop clearly visible.

While it is acknowledged that the road network can be highly congested resulting in delays and poor reliability for some bus services, the proposal would still improve bus reliability by reducing common sources of delay at this location. Numerous bus stops positioned closely together multiply the delays associated with buses leaving the traffic stream, allowing customers to board / alight and then waiting to re-enter the traffic stream.

Improvements to the reliability of bus services are expected to encourage public transport use. While for some people optimisation of bus stop spacing would mean additional walking distance and reduced convenience, the proposed changes would still mean the bus services using the corridor would be accessible and remain an attractive transport option.

Local councils are responsible for the provision of bus shelters and their locations. Comments and suggestions about bus shelters at stops not affected by the proposal should be directed to Inner West Council.

The proposed removal of bus stop 220444 (#82) is not related to any cycleway proposal.

### 3.27.2 Increased walking distance to next stop

**Submission number(s)**

81

**Issue description**

A concern was raised that the removal of bus stop 220444 (#82) would result in a longer walking distance for the elderly, young families, shoppers and people with disabilities.

**Response**

While the spacing between stops has increased to greater than 400 metres, the proposed stop locations in this area still maintain a walkable catchment (ie stops within a 400 metre radius or a five minute walk) consistent with the Improving Transport Choice and Sydney’s Bus Future guidelines (refer to Section 3.1 for further information about bus stop accessibility).

It is acknowledged that the removal of bus stop 220444 (#82) may inconvenience some people by increasing walking distances, however this needs to be balanced against the benefits of improving on-time running along the entire route. With the removal of bus stop 220444 (#82), the maximum additional walking distance to the next stop (220445 near Agar Street) would be about 190 metres. It is noted that Addison Road at this location is relatively flat and that concrete footpaths are provided on both sides of the road.

### 3.27.3 General support

**Submission number(s)**

20

**Issue description**

Support was expressed for the removal of bus stop 220444 (#82) as it would improve reliability.

**Response**

Support noted.
3.27.4 Alternative proposal

Submission number(s)
1, 166

Issue description
In summary, the following alternative proposals were suggested in relation to this stop location:

- Retain bus stop 220444 (#82) as removing bus stop 220444 (#82) and relocating bus stop 220443 (#83) are not both needed
- Remove another bus stop from Addison Road as they are all very close together
- Remove the stop at the traffic lights near Illawarra Road (220445) or between John Street and Bright Street (220443) instead.

Response
The reasons for removing bus stop 220444 (#82) have been stated above in section 3.27.1. Opportunities to improve reliability by removing other stops along Addison Road were not identified as part of the planning process.

Unlike bus stop 220444 (#82), the bus stops near William Street 220443 (#83) and Agar Street (220445) are paired with outbound bus stops. Paired bus stops are preferred because they provide a better customer experience by allowing boarding and alighting to happen near each other, with the opposite stop clearly visible.

3.28 Route 428 – Extension of stop 220443, Addison Road near William Street, Marrickville (#83)

A total of six community submissions were received regarding the proposed extension of the bus stop 220443 at Location #83, four of which were specifically against the proposed change and one of which was in support. The main issues raised were:

- Impacts on traffic and turning movements
- Potential impacts on driveways
- Loss of parking
- Noise and air quality impacts.

3.28.1 Scope / justification of removal

Submission number(s)
12, 95, 96, 167, 183

Issue description
Clarification regarding the scope of works proposed at bus stop 220443 (#83) was sought as well as the justification for the change noting that it is not clear how reliability would be improved. The following comments were also made:

- Relocation will increase traffic on Addison Road and cause difficulties for traffic movement, specifically in relation to vehicles turning to and from Park Street
- Concern about impacts of tactile pavement on driveways
- Additional parking would be of no benefit
- Current non-compliance of No Stopping signs in relation to the pedestrian refuge

Response
The February 2017 community update and Figure 3-13 in Chapter 3 (Description of the proposal) of the REF incorrectly showed that bus stop 220443 (#83) would be relocated five metres to the west. However, the proposal was correctly shown on the concept drawing included in Appendix B.
of the REF. It is proposed that the Bus Zone (and No Stopping signage) be extended four metres east and the Tactile Ground Surface Indicators (TGSI) and a plinth sign be installed three metres east of the existing J-stem sign (to be removed). The existing shelter would remain in its current position.

At bus stop 220443 (#83), the J-stem signage is currently located directly in front of the bus shelter and obstructs passenger access to the bus doors. The proposed changes would address this issue.

The new location for the TGSI and plinth signage would not impede any driveway access.

With the bus zone being extended to the east (rather than the west as clarified above), stopped buses would be positioned further away from the Park Street intersection and would therefore not impede traffic movements. No additional parking is proposed adjacent to bus stop 220443 (#83).

Non-compliance with No Stopping signs on local roads is an enforcement issue for consideration by Inner West Council.

### 3.28.2 Increased walking distance to next stop

**Submission number(s)**
99

**Issue description**
A concern was raised about the increased walking distances to alternative stops as a result of the relocation of bus stop 220443 (#83).

**Response**
Bus stop 220443 (#83) is proposed to be extended by about four metres east to improve customer access to buses (as clarified above in 3.28.1). There would be no resulting increase in walking distance to this particular stop.

### 3.28.3 Impacts on business

**Submission number(s)**
12, 167, 183

**Issue description**
Concerns were raised about the impacts on local businesses associated with the removal of parking outside 241-245 Addison Road and the obstruction of driveways.

**Response**
Bus stop 220443 (#83) is proposed to be slightly extended by about four metres to the east (as clarified above in 3.28.1). There would be no change to parking and bus stop infrastructure would not impede driveways. As is currently the case, access to the driveway of 239 Addison Road would continue to be impeded for short periods when a bus is required to use bus stop 220443 (#83).

### 3.28.4 Traffic safety

**Submission number(s)**
23, 96, 167, 183

**Issue description**
Concerns were raised about the safety impact of relocating 220443 (#83) five metres west and closer to the Park Street intersection. A comment was made that traffic hazards have not been adequately addressed.
Response
Bus stop 220443 (#83) is proposed to be slightly extended by about four metres to the east (as clarified above in 3.28.1). Stopped buses would be positioned further away from the Park Street intersection and would therefore not impede traffic movements.

3.28.5 Environmental and amenity impacts
Submission number(s)
96, 167, 183
Issue description
Concerns were expressed about the operational environmental impacts on adjacent properties in terms of noise, air pollution and general amenity for adjacent residents.

Response
Bus stop 220443 (#83) is proposed to be slightly extended by about four metres to the east (as clarified above in 3.28.1). There would be negligible change to the operation of this bus stop and no expected increases in environmental impacts for adjacent residents. Noise and air quality impacts are assessed in sections 6.4 and 6.8 of the REF respectively.

3.28.6 Project costs
Submission number(s)
95
Issue description
A comment was made that the relocation of bus stop 220443 (#83) would be a waste of money.

Response
Bus stop 220443 (#83) is proposed to be slightly extended to the east by about three metres (as clarified above in 3.28.1). This change would assist customers accessing the stopped bus. It is considered a worthwhile change and would involve minimal adjustments to the existing bus stop.

3.29 Route 428 – Removal of stop 220353, New Canterbury Road near Herbert Street, Dulwich Hill (#84)
A total of five community submissions were received regarding the proposed removal of bus stop 220353 at Location #84, four of which were specifically against the proposed change and one of which was in support. The main issues raised were:

• Need for and justification of the proposed change noting that the stop is sheltered, does not affect traffic and will experience increased demand
• Increased walking distances and the impact this would have on the elderly and less mobile.
• Alternative proposals.

3.29.1 Scope / justification of removal
Submission number(s)
35, 79, 185, 209, 214
Issue description
The justification for the removal of bus stop 220353 (#84) was questioned on the following basis:

• Bus stop provides good shelter
• Bus stop does not currently impede traffic flow
- Bus stop will experience increased demand due to development in the area
- Removal of the bus stop will cause overcrowding at the next bus stop (220354) near Marrickville Road
- Bus stop is close to important community facilities such as the Salvation Army, Father Dave's Old School Boxing Academy, Holy Trinity Dulwich Hill, Dulwich High School of Visual Art and Design and the Emmanuel Tsardoulias Community Library.

Response
Section 3.1 of this report addresses the strategic need and justification for the proposal. It also considers the issues of bus stop accessibility and parking.

Table 2-5 in section 2.1 of the REF identified the particular bus service issues for this bus stop. Bus stop 220353 (#84) is located close to the preceding stop near Morton Avenue (204949) (about 280 metres) and the next stop near Marrickville Road (220354) (about 185 metres), which is the main stop for Dulwich Hill shops.

Due to the bend in New Canterbury Road at this location, bus stop 220353 (#84) has no corresponding inbound stop. Paired bus stops provide a better customer experience by allowing boarding and alighting to happen near each other, with the opposite stop clearly visible.

3.29.2 Increase walking distance to next stop

Submission number(s)
105

Issue description
A concern was raised about the removal of bus stop 220353 (#84) as it provides easy access for people who are less mobile.

Response
While the spacing between stops has increased to greater than 400 metres, the proposed stop locations in this area still maintain a walkable catchment (ie stops within a 400 metre radius or a five minute walk) consistent with the Improving Transport Choice and Sydney’s Bus Future guidelines (refer to Section 3.1 for further information about bus stop accessibility).

It is acknowledged that the removal of bus stop 220353 (#84) may inconvenience some people by increasing walking distances, however this needs to be balanced against the benefits of improving on-time running on this route. The maximum increased walking distance would be about 180 metres. It is noted that footpaths are provided in this location and a pedestrian refuge assists crossing of Herbert Street.

3.29.3 Alternative proposal

Submission number(s)
209

Issue description
Suggestion the bus stop near the corner of Morton Street (one stop prior 204949) should be removed instead.

Response
Bus stop 204949 was not considered for removal because it has a corresponding inbound bus stop. Paired bus stops provide a better customer experience by allowing boarding and alighting to happen near each other, with the opposite stop clearly visible.
3.30 Route 428 – Removal of stops 220324 and 220349, New Canterbury Road near Beach Road and Constitution Road, Dulwich Hill (#85 and #86)

A total of 26 community submissions were received regarding the proposed removal of bus stops 220324 and 220349 at Locations #85 and #86 respectively, 22 of which were specifically against the proposed change. The main issues raised were:

- Need for and justification of the proposed change noting that the stops are well used, provide important access to community facilities and will experience increased demand in the future
- Increased walking distances and the impact this would have on the elderly and less mobile.

3.30.1 Scope / justification of removal

Submission number(s)
24, 27, 35, 82, 83, 84, 88, 93, 97, 113, 115, 116, 118, 119, 120, 136, 152, 157, 185, 194, 210, 211, 214

Issue description
The justification for the removal of bus stops 220324 (#85) and 220349 (#86) was mainly questioned on the following basis:

- They are highly used
- Demand will increase due to development in the area
- Removal is inconsistent with encouraging people to use public transport
- They provide important access for students, young families and the elderly.

Other specific comments made in relation to the removal of these stops were:

- The remaining alternative bus stops would become overcrowded
- Provision of additional parking would provide no benefit
- These bus stops provide the nearest access to the bridge on Constitution Road, Johnson Park / Arlington Oval and new residential developments at Grove Street
- There is a potential increase in demand due to the temporary shutdown of the Bankstown rail line
- These bus stops are an important connection point for the light rail
- Removal of these stops will not improve reliability due to longer boarding times at the alternative bus stops.

Concern was also raised about the impact on other bus services that utilise bus stops 220324 (#85) and 220349 (#86) (routes 418, 444/445 and school buses).

Response
Section 3.1 of this report addresses the strategic need and justification for the proposal. It also considers the issues of bus stop accessibility and parking.

Table 2-5 in section 2.1 of the REF identified the particular bus service issues for these bus stops. Bus stop 220324 (#85) is located close to the preceding stop (220354) near Marrickville Road (about 165 metres) and the next stop (220325) near Terrace Road (about 250 metres). Bus stop 220349 (#86) is located close to the preceding stop (220348) near Terrace Road (about 230 metres) and the next stop (220350) near Lewisham Street (about 235 metres). The bus stops near Marrickville Road (220354 and 220350) are the more efficient services points in this part of the locality and are considered to have sufficient capacity to accommodate an increased number of customers.

The proposal aims to strike a balance between walking distances to bus stops, buses being able to keep to time, and bus passengers being able to reach their destinations quickly and reliably. The alternative bus stops still provide access to important community facilities in this location and it is
noted that bus stops 220325 and 220348 (which are to be retained) provide more direct access to the Dulwich Grove light rail stop.

Provision of parking is not an objective of the proposal. However, where bus stops are proposed for removal and there is an opportunity to reinstate parking, this has been proposed. Provision of on-street parking can provide benefits for nearby residences and businesses. Transport for NSW and Roads and Maritime would confirm the parking restrictions to be applied with council following the relocation or removal of specific bus stops. Council is responsible for implementation of parking restrictions on local roads (where parking is most affected by the proposal) and Roads and Maritime is responsible for the implementation of parking restrictions on State roads.

Improvements to the reliability of bus services are expected to encourage public transport use. While for some people optimisation of bus stop spacing would mean additional walking distance and reduced convenience, the proposed changes would still mean the bus services using the corridor would be accessible and remain an attractive transport option.

Transport for NSW has developed a Temporary Transport Strategy to address increased demand associated with the temporary closure of the Bankstown rail line. The Temporary Transport Strategy is included in the *Sydney Metro City & Southwest Sydenham to Bankstown Upgrade – Environmental Impact Statement*. The strategy will guide the planning and development of Temporary Transport Plans to keep customers moving.

The proposal, including the removal of bus stops 220324 (#85) and 220349 (#86), would improve bus reliability by reducing common sources of delay. A key issue is delays associated with servicing bus stops that are positioned too close together. Numerous bus stops positioned closely together multiply the delays associated with buses leaving the traffic stream, allowing customers to board / alight and then waiting to re-enter the traffic stream.

### 3.30.2 Increased walking distance to next stop

**Submission number(s)**

26, 27, 28, 84, 88, 119, 152, 153, 194, 211

**Issue description**

Concerns were expressed about increased walking distances to alternative stops with the removal of bus stops 220324 (#85) and 220349 (#86) and the impact that this would have on the elderly, students attending Dulwich Hill Public School and those accessing child care facilities (namely Dulwich Hill Preschool and Denison Road Long Daycare Centre near the corner of Denison Road and Constitution Road). The issue of exposure to weather as a result of the additional walk and personal security at night were also raised.

**Response**

It is acknowledged that the removal of bus stops 220324 (#85) and 220349 (#86) may inconvenience some people by increasing walking distances, however this consideration needs to be balanced against the benefits of improving on-time running on this route. The maximum increased walking distance would be about 230 metres. It is noted that footpaths are provided in this location and signalised pedestrian crossings are available at the Beach Road / Constitution Road / New Canterbury Road and Dulwich Street / Marrickville Road / New Canterbury Road intersections.

The additional walking required for some customers would primarily occur adjacent to New Canterbury Road. This is a relatively active space with opportunities for passive surveillance from adjoining residences. This coupled with the street lighting provided along Canterbury Road would minimise risks to personal security.

It is noted that following the proposed changes, bus stops 220325 and 220348 would be the most feasible alternative for students attending Dulwich Hill Public School. These stops can be safely accessed via Hercules Street and the pathway connection to New Canterbury Road.
3.31 Route 428 – Removal of stops 219376 and 219369, Canterbury Road near Minter Street, Canterbury (#90 and #91)

A total of four community submissions were received regarding the proposed removal of bus stops 219376 and 219369 at Locations #90 and #91, all of which were specifically against the proposed change. The main issue raised was need for and justification of the proposed change, noting that the stops provide access to adjacent shops and will experience future increases in demand.

3.31.1 Scope / justification of removal

Submission number(s)
11, 25, 192, 206

Issue description
The justification for the removal of bus stops 219376 (#90) and 219369 (#91) was questioned on the following basis:

- It would affect access to shops, including the Aldi supermarket
- It is likely to experience increased demand as a result of rezoning near the Canterbury Station
- Removal of these stops would discourage use of public transport.

Response
Table 2-5 in section 2.1 of the REF identified the particular bus service issues for these bus stops. Bus stop 219376 (#90) is located close to the preceding stop (219375) near Floss Street (about 260 metres) while bus stop 219369 (#91) is located close to the next stop (219370) near Church Street (about 190 metres). It is also noted that there are no pedestrian crossing facilities adjacent to these stops at the Minter Street intersection.

The Aldi supermarket and other shops on the western side of New Canterbury Road would still be easily accessible from the bus stops near Canterbury Station.

It is considered that the alternative stops near Canterbury Station (219321, 219377) can accommodate the additional demand associated with the removal of bus stops 219376 (#90) and 219369 (#91) and the future land use changes in the area.

3.32 Issues outside the scope of the proposal

This section considers issues raised in submissions that are outside the scope of the current proposal. In some cases, out of scope issues have also been considered in the ‘alternative proposals’ sections above specific to certain stops (specifically sections 3.1.2, 3.2.4, 3.3.6, 3.4.4, 3.7.3, 3.8.3, 3.10.4, 3.11.4, 3.17.2, 3.20.7, 3.21.3, 3.23.5, 3.26.4, 3.27.4 and 3.29.3).

3.32.1 Scope / justification

Submission number(s)
7, 30, 42, 44, 45, 53, 60, 61, 64, 74, 76, 87, 94, 107, 112, 113, 120, 124, 126, 128, 130, 132, 135, 137, 145, 176, 181, 209, 212

Issue description
Submissions raised a number of issues that are beyond the scope of the current proposal. These issues included:

- Requests for seating and shelter at other bus stops not considered as part of the proposal
- Requests for additional bus stops and the removal of other bus stops that are not related to proposal locations
- Suggested changes to bus routes and timetables
• Suggested replacement of peak period No Parking restrictions on Bexley Road with No Stopping restrictions because the route is congested outside peak periods
• Provision of additional bus priority at intersections and bus lanes
• Provision of air conditioning on buses
• Changes to local traffic management
• Improvements to smartphone tracking of buses
• Suggestion that buses arriving early should wait until the timetabled departure time
• Introduce the use of local shuttle buses
• Implement a road rule change to give priority to buses entering roundabouts
• Implement major improvements to bus stops in conjunction with public domain improvements at Dulwich Hill Station
• Increase services and stop building roads that encourage use of cars.

Response
Transport for NSW and State Transit Authority will take comments regarding bus stops, bus routes, timetables, the bus fleet and additional bus priority into consideration as part of future bus service reviews in the area.

Roads and Maritime will consider the comments made regarding changes to road rules and parking restrictions on Bexley Road and any State road within the extent of the proposal.

Improvements to bus stop infrastructure (including shelters and signs), parking on local roads, provision of local shuttle buses and local traffic management are the responsibility of the relevant local council. These comments should be directed to the relevant local council.
This chapter addresses submissions raised by the local councils. Submissions on the proposal were received from Inner West Council and Bayside Council. The issues raised are considered below in sections 4.1 (Inner West) and 4.2 (Bayside) and are addressed by location. For each council submission, proposal wide issues are considered first followed by issues raised in relation to specific locations.

4.1 Inner West Council

A submission was received from Inner West Council that described concerns about proposed changes to some individual bus stops and support for others (on Routes 412, 423, 426 and 428). Key concerns raised by Inner West Council included:

- Impacts on the community due to increased distances between stops
- Impact on accessibility to community facilities
- Removal of highly used stops
- Removal of advertising at bus stops affecting existing revenue arrangements.

4.1.1 Proposal wide issues

Issue

Council raised the following concerns regarding the proposal:

- The need for people to walk further to access the next nearest bus stop (therefore impacting more heavily on those with disabilities)
- Potential for overcrowding at remaining bus stops due to the loss in the overall number of bus stops available
- Usage levels could fall if the number of bus stops reduce.

Response

Section 6.1.2 of the REF assesses the impact of the proposed changes on accessibility. The assessment acknowledges that there would be some additional walking distance and reduced convenience for some users from the proposal. While there would be some impact to users, the proposal has aimed to achieve a spacing between bus stops of about 400 metres as per the spacing guideline contained in Sydney’s Bus Future for local and suburban routes.

While the spacing between stops has increased to greater than 400 metres, the proposed stop locations in this area still maintain a walkable catchment (ie stops within a 400 metre radius or a five minute walk) consistent with the Improving Transport Choice and Sydney’s Bus Future guidelines (refer to Section 3.1 for further information about bus stop accessibility). Improvements to the reliability of bus services are expected to encourage public transport use.

The potential for overcrowding at retained stops is considered limited because the proposal considers not only bus stops that are positioned too close together (relative to the recommended 400 metre spacing guideline under Sydney’s Bus Future), but also those which are underutilised relative to adjacent stops. In most cases, the bus stops identified for removal or relocation have an average 24-hour weekday demand of less than 30 passengers and have usage which is lower than the preceding and/or following bus stops on the route. In some cases, the average 24-hour weekday demand is less than ten passengers.

4.1.2 Proposal wide - other matters

Issue

Council advised that the following matters must be addressed for any existing bus stop that is proposed to be either removed or relocated:
• All costs involved with the relocation and/or removal of bus stops need to be met by Transport for NSW and Council needs to be compensated for the initial capital installation, removal and the new site installation costs
• Restoration of the footpaths to pre-existing conditions (ie matching existing surrounding footpath) needs be funded and undertaken by Transport for NSW.
• New and relocated bus stops need to be to be Disability Discrimination Act 1992 compliant with associated costs to be met by Transport for NSW.
• The loss of existing sites with approved advertising bus shelters will impact on income delivered to Council and compensation is therefore needed
• Any existing bus stop which currently has an advertising or non-advertising shelter should not to be relocated until agreement is reached with Council and the asset owner.

Response
The changes identified to bus stop infrastructure (including shelters, signage and plinths) on the concept drawings are indicative only (recommendations made by Roads and Maritime) to be considered by council. Ultimately, local councils are responsible for any changes to bus shelters, signage and plinths as a result of the proposal. Bus shelter relocations are not part of the proposal, but would occur separately in consultation with council.

At bus stops where shelters are required to be removed or established, the shelter will be removed or installed by council’s contractor.

Roads and Maritime would pay for the costs associated with the necessary physical works required to any bus shelters, signage and plinths as a result of the proposal, however is not responsible for any costs associated with potential losses in revenue from any bus shelter changes – that is a separate matter to be addressed between council and its contractor.

The position and dimensions of new and relocated bus stops (and those existing stops subject to significant alteration as a result of the proposal) would be assessed against the requirements of AS 1428.1-2001 Design for Access and Mobility prior to becoming operational. A further safeguard (SOE3) has been included to address this in Chapter 6 (Environmental Management) of this report. The provision of accessible bus stops is a shared responsibility between both council and Transport for NSW. Roads and Maritime would liaise directly with councils and Transport for NSW during implementation of the proposal to ensure that resulting bus stop infrastructure changes (ie new or relocated stops and existing stops subject to significant alteration as a result of the proposal) have been considered against these requirements.

4.1.3 Route 412 – Removal of stop 205027, Salisbury Road near Mary Street, Camperdown (#7)

Issue
Council objects to the proposed removal of bus stop 205027 (#7) because it would result in a loss of income and capital for the recently constructed shelter (which contains digital signage), loss of bus stop facility and loss of shelter amenity for commuters and pedestrians.

Response
At bus stops where shelters are required to be removed or established, the shelter will be removed or installed by council’s contractor.

Roads and Maritime would pay for the costs associated with the necessary physical works required to any bus shelters, signage and plinths as a result of the proposal, however is not responsible for any costs associated with potential losses in revenue from any bus shelter changes – that is a separate matter to be addressed between council and its contractor.

The bus shelter at bus stop 205027 could be considered for relocation to outbound bus stop 205036 (about 190 metres east of bus stop 205027).
4.1.4 Route 412 – Consolidation of stops 204821 and 204822, Salisbury Road near Durham Street and Myrtle Street (#9 and #14) and 204818 and 204817, Salisbury Road near Northumberland Avenue and Myrtle Street, Stanmore (#10 and #13)

Issue

Council objects to the proposed consolidation of bus stops 204818 (#10), 204817 (#13), 204821 (#9) and 204822 (#14) because it would result in a loss of income, capital costs, loss of bus stop facility and loss of shelter amenity for commuters and pedestrians. Council indicates that Transport for NSW will need to cover the costs bus shelters with advertising, including Disability Discrimination Act 1992 requirements and restoration of footpaths to original state. Adequate consultation with directly affected properties is needed due to loss of on-street parking.

Response

At bus stops where shelters are required to be removed or established, the shelter will be removed or installed by council’s contractor.

Roads and Maritime would pay for the costs associated with the necessary physical works required to any bus shelters, signage and plinths as a result of the proposal, however is not responsible for any costs associated with potential losses in revenue from any bus shelter changes – that is a separate matter to be addressed between council and its contractor.

The position and dimensions of new and relocated bus stops (and those existing stops subject to significant alteration as a result of the proposal) would be assessed against the requirements of AS 1428.1-2001 Design for Access and Mobility prior to becoming operational. A further safeguard (SOE3) has been included to address this in Chapter 6 (Environmental Management) of this report. The provision of accessible bus stops is a shared responsibility between both council and Transport for NSW. Roads and Maritime would liaise directly with councils and Transport for NSW during implementation of the proposal to ensure that resulting bus stop infrastructure changes (ie new or relocated stops and existing stops subject to significant alteration as a result of the proposal) have been considered against these requirements.

Transport for NSW and Roads and Maritime would confirm with the council the parking restrictions to be applied following the relocation or removal of specific bus stops. Council is responsible for implementation of parking restrictions on local roads (where parking is most affected by the proposal) and Roads and Maritime is responsible for the implementation of parking restrictions on State roads.

As noted in section 1.2 of this submissions report, the REF was publically displayed for 29 days between 8 February 2017 and 8 March 2017. The REF was also placed on the Roads and Maritime project website and made available for download and its availability was advertised in relevant local newspapers.

In addition to the public display, a community update was letterbox-dropped to residents and businesses, and additional stakeholders were sent the community update with a covering email or letter. During the public display period, project team staff also visited many potentially affected residents, businesses and other stakeholders near bus stops with proposed significant changes.

4.1.5 Route 412 – Removal of stops 204824 and 204815, Douglas Street near Bruce Street, Stanmore (#15 and #16)

Issue

Council requests that bus stops 204824 (#15) and 204815 (#16) should remain given it would be a considerable distance between stops if they are removed.

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9 Removal of four bus stops, establishment of two new bus stops (with new transit stop numbers) at a new location.
Response

Bus stop 204824 (#15) was identified for removal because it is close to the preceding stop near Albany Road (204814) (about 240 metres) and the next stop on Percival Road (204816) (about 300 metres). Bus stop 204815 (#16) was identified for removal because it is close to the preceding stop near Percival Road (204811) (about 240 metres) and the next stop near Stanley Street (204825) (about 200 metres). With the proposed changes, this results in a spacing of about 540 metres and 440 metres for bus stop 204824 (#15) and bus stop 204815 (#16) respectively.

The number of customers boarding and alighting is low at these bus stops relative to the preceding and following stops (inbound stops 204814 and 204816, outbound stops 204811 and 204825). Opal data shows an average 24-hour weekday demand of twelve passengers for bus stop 204824 (#15), compared with 35 for the preceding stop and 79 for the following stop) and 18 passengers for bus stop 204815 (#16) (compared with 74 for the preceding stop and 29 for the following stop).

4.1.6 Route 412 – Removal of stops 204923 and 204926, Trafalgar Street near Audley Street, Petersham (#17 and #18)

Issue

Council objects to the proposed removal bus stops 204923 (#17) and 204926 (#18) because it would result in a loss of income (at Location #18), capital costs, loss of bus stop facility and loss of shelter amenity for commuters and pedestrians.

Council recommends that removal of bus stop 204926 (#18) be reconsidered based on utilisation of the stop at present and notes that a four parking space increase should not be promised to residents, as a planned bicycle route at this location will again remove this parking. Council requests that a treatment option be presented to council at this location before finalisation.

Response

At bus stops where shelters are required to be removed or established, the shelter will be removed or installed by council’s contractor.

Roads and Maritime would pay for the costs associated with the necessary physical works required to any bus shelters, signage and plinths as a result of the proposal, however is not responsible for any costs associated with potential losses in revenue from any bus shelter changes – that is a separate matter to be addressed between council and its contractor.

The shelter at bus stop 204923 (#17) could be considered for relocation to bus stop 204945 on Crystal Street while the shelter at bus stop 204926 (#18) could be considered for relocation to bus stop 204953 on Gordon Street.

Bus stop 204926 (#18) has low levels of customer usage relative to the preceding (204912) and following (204953) stops. Opal data shows an average 24-hour weekday demand of 19 passengers for bus stop 204926 (#18), compared with 104 for the preceding stop (204912) and 60 for the following stop (204953).

Transport for NSW / Roads and Maritime will consult further with council about the cycleway mentioned in council’s submission and the impact this may have on reinstatement of parking at Location #18. Council is responsible for implementation of parking restrictions on local roads (where parking is most affected by the proposal) and Roads and Maritime is responsible for the implementation of parking restrictions on State roads.

4.1.7 Route 412 – Removal of stop 220429, Livingstone Road near Marrickville Road, Marrickville (#21)

Issue

Council objects to the proposed removal of bus stop 220429 (#21) because it would result in a loss of income, capital costs, loss of bus stop facility and loss of shelter amenity for commuters and pedestrians. Council notes the bus stop is also located in close-proximity to the proposed library,
residential units, St Brigid’s Church and school and is frequented in high numbers on a daily basis including by elderly residents.

Response

At bus stops where shelters are required to be removed or established, the shelter will be removed or installed by council’s contractor.

Roads and Maritime would pay for the costs associated with the necessary physical works required to any bus shelters, signage and plinths as a result of the proposal, however is not responsible for any costs associated with potential losses in revenue from any bus shelter changes – that is a separate matter to be addressed between council and its contractor.

The shelter at 220429 (#21) could be considered for relocation 230 metres north to bus stop 220428.

Bus stop 220429 (#21) was identified for removal because it is close to the preceding stop near Graham Avenue (220428) (about 230 metres) and the next stop south of Marrickville Road (2204108) (about 150 metres). This results in a spacing of about 380 metres which is closer to the 400 metre guideline spacing.

As noted in Table 2-1 section 2.1 of the REF, this stop does have average 24-hour weekday demand of 59 passengers, with 48 per cent usage by seniors / pensioners. These people would be able to access the 412 services via adjacent bus stops (220428 or 2204108).

The proposal for a new Marrickville Library, associated community spaces and apartments at 313 - 319 Marrickville Road is noted. Residents and users of these facilities would still have access to the nearby bus stops referred to above to access these facilities and to interchange with other bus services on Marrickville Road.

4.1.8 Route 412 – Removal of stop 220494, Beauchamp Street near School Parade, Marrickville (#23)

Issue

Council recommends that the removal of bus stop 220494 (#23) be reconsidered based on utilisation of the stop at present, especially by seniors and pensioners. Council also notes this route is the only route servicing the Royal Prince Alfred Hospital.

Response

Bus stop 220494 (#23) was identified for removal because it is close to the next stop near Livingstone Road (about 140 metres). The number of customers boarding and alighting is low at this bus stop relative to the preceding (2204103) and following (2204105) stops with Opal data showing average 24-hour weekday demand of 27 passengers (compared with 39 at the preceding bus stop (2204103) and 46 at the following stop (2204105)).

The removal of bus stop 220494 (#23) would result in a maximum additional walking distance of about 140 metres. While the grade is moderate, there is a pathway and pedestrian refuge which facilitates crossing of School Parade.

Bus stop 220494 (#23) also lacks a corresponding outbound stop. Paired bus stops are preferred because they improve the customer experience by allowing boarding and alighting to happen near each other, with the opposite stop clearly visible.

4.1.9 Route 412 – Removal of stop 220498, Wardell Road near Ewart Street, Marrickville (#24)

Issue

Council recommends that removal of bus stop 220498 (#24) be reconsidered based on utilisation of the stop at present. Council also requests that the bus stops along routes 431, 432 and 433
need major improvements made in conjunction with public domain improvements to Dulwich Hill Station.

Response

Bus stop 220498 (#24) was identified for removal because is located close to the preceding stop at Dulwich Hill Station (220432) (about 130 metres) and the next stop near Riverside Crescent (220499) (about 210 metres). This stop also has low usage relative to preceding and following stops with Opal data showing average 24-hour weekday demand of eight passengers (compared with 81 for the preceding stop and 10 for the following stop).

While it is noted that the provision of bus stop infrastructure is the responsibility of Council, comments regarding improvements to bus stops along routes 431, 432 and 433 are noted and will be considered in future bus service planning for the area.

4.1.10 Route 423 – Relocation of stop 220449 and extension of stops 220467, 220466, 220420, and 2204102, Victoria Road, Marrickville Road and Illawarra Road, Marrickville (#59, #60, #61, #62 and #63)

Issue

Council noted the net loss of on-street parking but expressed support for the proposed changes at 220449 (#59), 220467 (#60), 220466 (#61), 220420 (#62) and 2204102 (#63) on the basis that there would be better draw-in space for buses, reduced impacts on traffic flow and better access with buses being able to pull up parallel to the kerb.

Council requests that the costs of relocation to be covered and consultation to be carried out in relation to the parking loss at these locations.

Response

Support for changes at these locations is noted.

Roads and Maritime would pay for the costs associated with the necessary physical works required to any bus shelters, signage and plinths as a result of the proposal, however is not responsible for any costs associated with potential losses in revenue from any bus shelter changes – that is a separate matter to be addressed between council and its contractor.

The public display of the REF has provided an opportunity for comment in relation to proposed changes to on-street parking. Council is responsible for implementation of parking restrictions on local roads (where parking is most affected by the proposal) and Roads and Maritime is responsible for the implementation of parking restrictions on State roads.

4.1.11 Route 426 – Relocation of stop 220480, Marrickville Road near Livingstone Road (#79)

Issue

Council notes the net loss of two parking spaces, but also acknowledges the benefit to the future library users in relation to the proposed relocation of bus stop 220480 (#79). Council requests that the costs of relocation to be covered including those to meet the Disability Discrimination Act 1992 requirements and the restoration of footpaths to their original state. Adequate consultation with directly affected properties is needed due to the loss of on-street parking.

Response

The proposal included relocation of bus stop 220480 (#79) about 60 metres south-east to the departure side of the Livingstone Road intersection. The proposal also included removal of bus stops 220487 (#80) and 220430 (#81) located on Marrickville Road, near Fletcher Street and Petersham Road respectively.

Following a review of the submissions for these bus stops, it was recognised that bus stops 220487 (#80) and 220430 (#81) should be retained given their relatively high levels of usage and
proximity to active land uses associated with the Marrickville town centre. Without the removal of bus stop 220430 (#81), the relocation of bus stop 220480 (#79) would have resulted in unsuitable spacing (about 100 metres) and is therefore no longer proposed (refer to Chapter 5 Changes to the proposal).

4.1.12 Route 426 – Removal of stops 220487 and 220430, Marrickville Road near Fletcher Street and Petersham Road, Marrickville (#80 and #81)

Issue
Council objects to the proposed removal of stops 220487 (#80) and 220430 (#81) which would result in loss of advertising income, loss of capital cost for the recently constructed shelters, loss of bus stop facilities and loss of shelter amenity for commuters and pedestrians. Council also notes that bus stops on Marrickville Road are highly utilised by residents and recommends that these stops be retained as they service the western end of Marrickville High Street.

Response
Following a review of the submissions for these bus stops, it was recognised that bus stops 220487 (#80) and 220430 (#81) should be retained given their relatively high levels of usage and proximity to active land uses associated with the Marrickville town centre. Removal of these bus stops is therefore no longer proposed (refer to Chapter 5 Changes to the proposal).

4.1.13 Route 428 – Removal of stop 220444, Addison Road near East Street, Marrickville (#82)

Issue
Council recommends that the removal of bus stop 220444 (#82) be reconsidered based on utilisation of the stop at present.

Response
Bus stop 220444 (#82) is located close to the preceding stop (220443) near William Street (about 315 metres) and the next stop (220445) near Agar Street (about 190 metres). The number of customers boarding and alighting at this bus stop is also low relative to preceding and following stops with an average 24-hour weekday demand of 41 passengers (compared with 117 for the previous stop and 107 for the following stop).

Bus stop 220444 (#82) is also not paired with an outbound stop. Paired bus stops provide a better customer experience by allowing boarding and alighting to happen near each other, with the opposite stop clearly visible.

4.1.14 Route 428 – Relocation of stop 220443, Addison Road near William Street, Marrickville (#83)

Issue
Council notes that No Stopping signs in relation to the adjacent pedestrian refuge are non-compliant, but that with the possible removal of the pedestrian refuge island for a bicycle route, the No Stopping zones could be made compliant.

Response
A No Stopping zone is currently provided east of the 220443 (#83). A change to parking restrictions adjacent to the pedestrian refuge would be agreed with Council during implementation of the proposal. Council is responsible for implementation of parking restrictions on local roads (where parking is most affected by the proposal) and Roads and Maritime is responsible for the implementation of parking restrictions on State roads.
4.1.15 Route 428 – Removal of stop 220353, New Canterbury Road near Herbert Street, Dulwich Hill (#84)

Issue
Council objects to the removal of bus stop 220353 (#84) because it is adjacent to the new Dulwich Hill library.

Response
Bus stop 220353 (#84) is located close to the preceding stop near Morton Avenue (204949) (about 280 metres) and the next stop near Marrickville Road (220354) (about 185 metres), which is the main stop for Dulwich Hill shops. The walking distance from stop 220354 near Marrickville Road to the Emmanuel Tsardoulas Community Library would be about 150 metres.

Due to the bend in New Canterbury Road at this location, bus stop 220353 (#84) has no corresponding inbound stop. Paired bus stops provide a better customer experience by allowing boarding and alighting to happen near each other, with the opposite stop clearly visible.

4.1.16 Route 428 – Removal of stops 220324 and 220349, New Canterbury Road near Beach Road and Constitution Road, Dulwich Hill (#85 and #86)

Issue
Council acknowledges that bus stops 220324 (#85) and 220349 (#86) are close to other stops at present but notes that there are a large number of dwellings surrounding the stop and that this will increase with the growing density planned for Dulwich Hill. In this context, Council recommends these bus stops be retained.

In relation to the proposed removal of bus stop 220349 (#86), Council’s objection is also based on a loss of income, capital costs, loss of bus stop facility and loss of shelter amenity for commuters and pedestrians.

Response
Bus stop 220324 (#85) is located close to the preceding stop (220354) near Marrickville Road (about 165 metres) and the next stop (220325) near Terrace Road (about 250 metres). Bus stop 220349 (#86) is located close to the preceding stop (220348) near Terrace Road (about 230 metres) and the next stop (220350) near Lewisham Street (about 235 metres). The bus stops near Marrickville Road (220354 and 220350) are the more efficient service points in this part of the locality and are considered to have sufficient capacity to accommodate an increased number of customers.

Roads and Maritime would pay for the costs associated with the necessary physical works required to any bus shelters, signage and plinths as a result of the proposal, however is not responsible for any costs associated with potential losses in revenue from any bus shelter changes – that is a separate matter to be addressed between council and its contractor.

The shelter at 220349 (#86) could be considered for relocation 230 metres north of bus stop 220428, however this is a matter to be determined by council.

4.1.17 Route 428 – Relocation of stop 220346, New Canterbury Road near Clargo Street, Dulwich Hill (#89)

Issue
Council does not object to the proposed relocation of bus stop 220346 (#89) provided that new relocation works comply with Disability Discrimination Act 1992 standards and adequate resident consultation is undertaken.
Response

The position and dimensions of new and relocated bus stops (and those existing stops subject to significant alteration as a result of the proposal) would be assessed against the requirements of AS 1428.1-2001 *Design for Access and Mobility* prior to becoming operational. A further safeguard (SOE3) has been included to address this in Chapter 6 (Environmental Management) of this report. The provision of accessible bus stops is a shared responsibility between both council and Transport for NSW. Roads and Maritime would liaise directly with councils and Transport for NSW during implementation of the proposal to ensure that resulting bus stop infrastructure changes (i.e. new or relocated stops and existing stops subject to significant alteration as a result of the proposal) have been considered against these requirements.

As noted in section 1.2 of this submissions report, the REF was publically displayed for 29 days between 8 February 2017 and 8 March 2017. The REF was also placed on the Roads and Maritime project website and made available for download and its availability was advertised in relevant local newspapers.

In addition to the public display, a community update was letterbox-dropped to residents and businesses, and additional stakeholders were sent the community update with a covering email or letter. During the public display period, project team staff also visited many potentially affected residents, businesses and other stakeholders near bus stops with significant changes.

The community will be informed of the final proposal before any works are carried out.

4.2 Bayside Council

4.2.1 Proposal wide - bus priority and sustainable transport

Issue

Bayside Council requested adjustments along Route 422 to provide priority for buses and sustainable transport. Council notes that where bus routes are anticipated, sustainable travel methods such as bicycles should also be planned for in the same corridor. West Botany Street and Princes’ Highway are routes that are currently part of the Roads and Maritime priority routes for bicycles.

Response

Bayside Council comments regarding additional bus priority along Route 422 will be considered by Transport for NSW as part of future bus service planning for the area.

Planning for bicycles along the Route 422 corridor is beyond the scope of the current proposal. However, the NSW Government is committed to working with councils to make walking and cycling, more convenient, safer and enjoyable transport options. By targeting investment to improve walking and cycling in the areas where most short trips occur, the NSW Government supports more accessible, liveable and productive towns, cities and centres. For the 2016-17 financial year, the NSW Government is committed to contribute $39 million to fund more than 300 walking and cycling projects across NSW.
5 Changes to the proposal

5.1 Overview

Following consideration of submissions two key changes to the proposal are now proposed as described in sections 5.2 and 5.3.

Tables 5-1 to 5-5 below provide an overview of the proposal inclusive of proposed changes. They also include other clarifications relating to kerbside parking restrictions and parking loss / gain estimates that have arisen as a result of further concept design development. Changes are shown in bold, while updated concept drawings are included in Appendix B. An illustration of the confirmed scheme is provided separately with the community update that accompanies this report.

The changes identified to bus stop infrastructure (including shelters, signage and plinths) on the concept drawings are indicative only (recommendations made by Roads and Maritime) to be considered by council. Ultimately, local councils are responsible for any changes to bus shelters, signage and plinths as a result of the proposal. Bus shelter relocations are not part of the proposal, but would occur separately in consultation with the relevant local council.

The proposed changes to parking arrangements as a result of the proposal are indicative only and are based on local parking restrictions in the adjacent streets. Transport for NSW and Roads and Maritime would confirm with the council the parking restrictions to be applied following the relocation or removal of specific bus stops. Council is responsible for implementation of parking restrictions on local roads (where parking is most affected by the proposal) and Roads and Maritime is responsible for the implementation of parking restrictions on State roads.

Table 5-1 Overview of the proposal - Route 412

<table>
<thead>
<tr>
<th>Ref#</th>
<th>Location</th>
<th>Proposal</th>
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</table>
| #7   | Salisbury Road, near Mary Street, Camperdown (inbound stop – 205027) | • Remove bus stop 205027  
• Convert existing bus stop 205027 to parking (+2 car spaces) |
| #9, 10 | Salisbury Road near Durham Street, Stanmore (outbound stop - 204821)  
Salisbury Road near Northumberland Avenue, Stanmore (inbound stop - 204818) | • Remove existing bus stops 204821 and 204818 and convert to parking (+3 car spaces, +1 car space)  
• New bus stops located near Myrtle Lane (-3 car spaces outside 69 Salisbury Road and -4 car spaces outside 30b Salisbury Road). **Install new signage and TGSIs**  
• Remove bus stops 204822 and 204817 and convert to parking (+3 car spaces and +1 car space) |
| #11, 12 | Salisbury Road near Myrtle Lane, Stanmore (inbound stop - new stop and transit stop number)  
Salisbury Road near Myrtle Lane, Stanmore (outbound stop - new stop and transit stop number) | • Remove bus stops 204822 and 204817 and convert to parking (+3 car spaces and +1 car space) |
| #13, 14 | Salisbury Road near Myrtle Street, Stanmore (outbound stop - 204822)  
Salisbury Road near Myrtle Street, Stanmore (inbound stop - 204817) | • Remove bus stops 204815 and 204824  
• Convert existing bus stop 204815 to parking (+1 car spaces) and convert existing bus stop 204824 to No Stopping |
| #15, 16 | Douglas Street near Bruce Street, Stanmore (inbound stop - 204824)  
Douglas Street near Bruce Street, Stanmore (outbound stop - 204815) | • Remove bus stops 204926 and 204923 |
<p>| #17 | Trafalgar Street near Audley Street, | |</p>
<table>
<thead>
<tr>
<th>Ref#</th>
<th>Location</th>
<th>Proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>#18</td>
<td>Petersham (inbound stop - 204923) Trafalgar Street near Audley Street, Petersham (outbound stop - 204926)</td>
<td>• Convert existing bus stops 204926 and 204923 to parking (+4 car spaces and +5 car spaces)</td>
</tr>
<tr>
<td>#21</td>
<td>Livingstone Road, near Marrickville Road, Marrickville (outbound stop 220429)</td>
<td>• Remove bus stop 220429 • Convert existing bus stop 220429 to parking (+3 car spaces)</td>
</tr>
<tr>
<td>#23</td>
<td>Beauchamp Street, near School Parade, Marrickville (inbound stop – 220494)</td>
<td>• Remove bus stop 220494 • Convert existing bus stop 220494 to parking (+3 car spaces)</td>
</tr>
<tr>
<td>#24</td>
<td>Wardell Road near Ewart Street, Marrickville (outbound stop - 220498)</td>
<td>• Remove bus stop 220498 • Convert bus stop 220498 to No Parking zone</td>
</tr>
<tr>
<td>#25, #26, #27, #28</td>
<td>Permanent Avenue near Prince Edward Avenue, Earlwood (outbound stop - 220643) Permanent Avenue near Prince Edward Avenue, Earlwood (inbound stop - 220634) Permanent Avenue near Younger Avenue, Earlwood (inbound stop - 220633) Permanent Avenue near Lovat Avenue, Earlwood (outbound stop - 220644)</td>
<td>• For bus stop 220643, replace kerb ramp with concrete pad. Formalise bus zone with new signage, hardstand and TGSI. Maintain 10 metre No Stopping distance from the intersection. <strong>No change to parking</strong> • For bus stop 220634 formalise bus zone between two power poles with new signage, hardstand and TGSI. Remove one tree outside 31 Permanent Avenue. <strong>No change to parking</strong> • For bus stop 220633 formalise 20 metre bus zone between power pole and driveway of 59 Permanent Avenue. <strong>Install new signage, hardstand and TGSI. No change to parking</strong> • For bus stop 220644 formalise 25 metre bus zone between speed hump and power pole at corner of Permanent Avenue and Lovat Avenue. <strong>Install new signage, hardstand and TGSI. No change to parking</strong></td>
</tr>
<tr>
<td>#29, #30</td>
<td>Permanent Avenue near Ashton Avenue, Earlwood (outbound stop - 220645) Permanent Avenue near Waterside Crescent, Earlwood (inbound stop - 220632)</td>
<td>• Remove bus stops 220645 and 220632 • Convert existing bus stops 220645 and 220632 to parking (+3 car spaces and +1 car space)</td>
</tr>
<tr>
<td>#31, #32</td>
<td>Earlwood Avenue near Flers Avenue, Earlwood (outbound stop - 220648) Earlwood Avenue near Flers Avenue, Earlwood (inbound stop - 220629)</td>
<td>• Remove bus stops 220648 and 220629 • Convert existing bus stops 220648 and 220629 to parking (+2 car spaces and +2 car spaces)</td>
</tr>
<tr>
<td>#35, #36</td>
<td>Wardell Road near Homer Street, Earlwood (outbound stop - 220652) Homer Street near Wardell Road, Earlwood (inbound stop - 220625)</td>
<td>• Remove bus stops 220652, 220625 and 220653 • Convert existing bus stops 220652 and 220625 to parking (+2 car spaces and +3 car spaces)</td>
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<td>Ref#</td>
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<tr>
<td>#37</td>
<td>Homer Street near View Street, Earlwood (outbound stop - 220653)</td>
<td>car spaces)</td>
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<td></td>
<td></td>
<td>• Convert bus stop 220653 to No Parking</td>
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<tr>
<td>#38,</td>
<td>Homer Street near Morgan Street, Earlwood (inbound stop - 2206123)</td>
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<tr>
<td>#39</td>
<td>Homer Street near Morgan Street, Earlwood (outbound stop - 2206129)</td>
<td>• Remove bus stop 2206123</td>
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<td></td>
<td></td>
<td>• Convert bus stop 2206123 to parking (+2 car spaces)</td>
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<td>• Relocate bus stop 2206129 about 80 metres west to the departure side</td>
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<td>of the roundabout, outside 446 Homer Street (+2 car spaces). Establish</td>
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<td>27 metre Bus Zone (-2 car spaces), install new signage, hardstand and</td>
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<td></td>
<td></td>
<td>TGSI.</td>
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<tr>
<td>#40,</td>
<td>Homer Street near Braeside Crescent, Earlwood (outbound stop - 2206132)</td>
<td>• Remove bus stops 2206132 and 2206119</td>
</tr>
<tr>
<td>#41</td>
<td>Homer Street near Angus Street, Earlwood (inbound stop - 2206119)</td>
<td>• Convert existing bus stops 2206132 and 2206119 to parking (+3 car</td>
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<td></td>
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<td>spaces and +4 car spaces)</td>
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<tr>
<td>#45</td>
<td>Bexley Road near William Street, Earlwood (inbound stop 220614)</td>
<td>• Extend bus stop 220614 to the south by two metres. Establish a 7 metre</td>
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<td></td>
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<td>loading zone (9:30am to 3:30pm Monday to Friday) outside 142 Bexley Road,</td>
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<td></td>
<td></td>
<td>Earlwood</td>
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<td></td>
<td></td>
<td>• No loss of parking</td>
</tr>
<tr>
<td>#49</td>
<td>Princes Highway near Gertrude Street, Arncliffe (outbound stop – 220561)</td>
<td>• Relocate bus stop 220561 about 150 metres north-east opposite Woolworths</td>
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<tr>
<td></td>
<td></td>
<td>Wolli Creek</td>
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<td></td>
<td></td>
<td>• Convert existing Bus Zone to No Stopping. Install new signage, hardstand</td>
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<td></td>
<td></td>
<td>and TGSI</td>
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<td></td>
<td></td>
<td>• No loss of parking as parking is not currently permitted at the new</td>
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<td></td>
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<td>location</td>
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<tr>
<td>#50,</td>
<td>West Botany Street opposite Marsh Street, Arncliffe (inbound stop – 220567)</td>
<td>• Remove bus stops 220568 and 220567 and convert both to No Stopping</td>
</tr>
<tr>
<td>#51</td>
<td>West Botany Street near Marsh Street, Arncliffe (outbound stop – 220568)</td>
<td>• No loss of parking</td>
</tr>
<tr>
<td>#52,</td>
<td>Bryant Street near Lennox Street, Rockdale (inbound stop – 221673)</td>
<td>• Remove bus stops 221662 and 221673</td>
</tr>
<tr>
<td>#53</td>
<td>Bryant Street near Farr Street, Rockdale (outbound stop – 221662)</td>
<td>• Convert existing bus stops 221662 and 221673 to parking (+2 car spaces</td>
</tr>
<tr>
<td></td>
<td></td>
<td>and +4 car spaces)</td>
</tr>
<tr>
<td>#54,</td>
<td>Bryant Street near George Street, Rockdale (outbound stop – 221664)</td>
<td>• Remove bus stops 221664 and 221670</td>
</tr>
<tr>
<td>#55</td>
<td>Bryant Street near Kent Street, Rockdale (inbound stop – 221670)</td>
<td>• Convert existing bus stops 221664 and 221670 to parking (+2 car spaces</td>
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<tr>
<td></td>
<td></td>
<td>and +3 car spaces)</td>
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</tbody>
</table>

Table 5-2 Overview of the proposal - Route 422
## Overview of the proposal - Route 423

<table>
<thead>
<tr>
<th>Ref#</th>
<th>Location</th>
<th>Proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>#57, #58</td>
<td>Princes Highway near Chandler Street, Rockdale (outbound stop – 221648) Princes Highway near Harrow Road, Kogarah (inbound stop – 2217137)</td>
<td>• It is now proposed that bus stops 221648 (#57) and 2217137 (#58) be retained. Refer below to section 5.2</td>
</tr>
<tr>
<td>#59, #60</td>
<td>Victoria Road near Sydenham Road, Marrickville (outbound stop – 220449) Victoria Road near Sydenham Road, Marrickville (inbound stop – 220467)</td>
<td>• Relocate bus stop 220449 about 65 metres south-west outside 228 Victoria Road. Establish a 30 metre bus zone with new signage and TGSI. Tree trimming as needed. Convert existing bus stop to parking (+3 car spaces) • Extend bus stop 220467 about 5 metres to the south-west (-1 car space)</td>
</tr>
<tr>
<td>#61</td>
<td>Marrickville Road near Victoria Road, Marrickville (inbound stop – 220466)</td>
<td>• Extend bus stop 220466 by 10 metres (-1 car space)</td>
</tr>
<tr>
<td>#62</td>
<td>Marrickville Road near Illawarra Road, Marrickville (outbound stop – 220420)</td>
<td>• Extend bus stop 220420 by 12 metres (-2 car spaces)</td>
</tr>
<tr>
<td>#63</td>
<td>Illawarra Road near Warburton Street, Marrickville (inbound stop – 2204102)</td>
<td>• Extend bus stop 2204102 by 12 metres (-2 car spaces)</td>
</tr>
<tr>
<td>#36, #37</td>
<td>Homer Street near Wardell Road, Earlwood (inbound stop - 220625) Homer Street near View Street, Earlwood (outbound stop - 220653)</td>
<td>• Proposal as per Route 412 • Remove bus stops 220625 and 220653 • Convert existing bus stop 220625 to parking +3 car spaces) • Convert bus stop 220653 to No Parking</td>
</tr>
<tr>
<td>#68</td>
<td>William Street near Woolcott Street, Earlwood (inbound stop – 220699)</td>
<td>• Relocate bus stop 220699 about 75 metres east outside 95 William Street. Establish a 40 metre bus zone with new signage and TGSI (-2 car spaces) • Remove tree outside 95 William Street</td>
</tr>
<tr>
<td>#69, #70</td>
<td>William Street near Bexley Road, Earlwood (inbound stop – 220696) William Street near Bexley Road, Earlwood (outbound stop – 2206117)</td>
<td>• Extend bus stop 220696 about 8 metres west (-1 car space) • Extend bus stop 2206117 about 5 metres east (-1 car space)</td>
</tr>
<tr>
<td>#71, #72</td>
<td>William Street near Miller Street, Kingsgrove (outbound stop – 220873) William Street near Ferrier Parade, Clemton Park (inbound stop – 220872)</td>
<td>• Remove bus stops 220873 and 220872 • Convert existing bus stops 220873 and 220872 to parking (+3 car spaces and +3 car spaces)</td>
</tr>
</tbody>
</table>
| #73, #74 | William Street near Hillside Avenue, Clemton Park (inbound stop – | • Remove bus stops 220875 and 220870 • Convert existing bus stops 220875 and
<table>
<thead>
<tr>
<th>Ref#</th>
<th>Location</th>
<th>Proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>#74</td>
<td>220870) William Street near Panorama Road, Kingsgrove (outbound stop – 220875)</td>
<td>220870 to parking (+2 car spaces and +2 car spaces)</td>
</tr>
<tr>
<td>#75</td>
<td>Kingsgrove Road near Pacific Street, Kingsgrove (outbound stop – 2208116)</td>
<td>• Remove bus stop 2208116 and convert to parking (+2 car spaces)</td>
</tr>
</tbody>
</table>

**Table 5-4 Overview of the proposal - Route 426**

<table>
<thead>
<tr>
<th>Ref#</th>
<th>Location</th>
<th>Proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>#59,</td>
<td>Victoria Road near Sydenham Road, Marrickville (outbound stop – 220449)</td>
<td>• Proposal as per Route 423</td>
</tr>
<tr>
<td>#60</td>
<td>Victoria Road near Sydenham Road, Marrickville (inbound stop – 220467)</td>
<td>• Relocate bus stop 220449 about 65 metres south-west outside 228 Victoria Road. Establish a 30 metre bus zone with new signage and TGSI (-5 car spaces). Tree trimming as needed. Convert existing bus stop to parking (+3 car spaces) • Extend bus stop 220467 about 5 metres to the south-west (-1 car space)</td>
</tr>
<tr>
<td>#61</td>
<td>Marrickville Road near Victoria Road, Marrickville (inbound stop – 220466)</td>
<td>• Proposal as per Route 423</td>
</tr>
<tr>
<td>#62</td>
<td>Marrickville Road near Illawarra Road, Marrickville (outbound stop – 220420)</td>
<td>• Extend bus stop 220466 by 10 metres (-1 car space)</td>
</tr>
<tr>
<td>#80,</td>
<td>Marrickville Road near Fletcher Street, Marrickville (outbound stop – 220487)</td>
<td>• Extend bus stop 220420 by 12 metres (-2 car spaces)</td>
</tr>
<tr>
<td>#81</td>
<td>Marrickville Road near Petersham Road, Marrickville (inbound stop – 220430)</td>
<td>• It is now proposed that bus stops 220487 (#80) and 220430 (#81) be retained. Refer below to section 5.3</td>
</tr>
<tr>
<td>#79</td>
<td>Marrickville Road near Livingstone Road, Marrickville (inbound stop – 220480)</td>
<td>• It is now proposed that bus stop 220480 (#79) be retained in its current location. Refer below to section 5.3</td>
</tr>
</tbody>
</table>

**Table 5-5 Overview of the proposal - Route 428**

<table>
<thead>
<tr>
<th>Ref#</th>
<th>Location</th>
<th>Proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>#82</td>
<td>Addison Road near East Street, Marrickville (inbound stop – 220444)</td>
<td>• Remove bus stop 220444</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Convert existing bus stop 220444 to parking (+3 car spaces)</td>
</tr>
<tr>
<td>#83</td>
<td>Addison Road near William Street, Marrickville (inbound stop – 220443)</td>
<td>• Extend bus zone 3 metres to the east to address the current obstruction presented by Bus Zone and bus stop signage. No change to parking</td>
</tr>
<tr>
<td>#84</td>
<td>New Canterbury Road near Herbert Street, Dulwich Hill (outbound stop – 220353)</td>
<td>• Remove bus stop 220353</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Convert existing bus stop 220353 to No Parking zone</td>
</tr>
<tr>
<td>Ref#</td>
<td>Location</td>
<td>Proposal</td>
</tr>
<tr>
<td>-------</td>
<td>--------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>
| #85,  | New Canterbury Road near Beach Road, Dulwich Hill (outbound stop – 220324) | • Remove bus stops 220324 and 220349  
• Convert existing bus stop 220424 to parking (+3 car spaces)  
• Convert bus stop 220349 to parking (+3 spaces)  
• Relocate shelter from 220349 650 metres north to 204949 |
| #86   | New Canterbury Road near Constitution Road, Dulwich Hill (inbound stop – 220349) |  |
| #89   | New Canterbury Road near Clargo Street, Dulwich Hill (inbound stop – 220346) | • Relocate bus stop 220346 about 17 metres east. Establish a 22 metre bus zone with new signage and TGSI (-2 car spaces). Convert existing bus stop to parking (+2 car spaces) |
| #90,  | Canterbury Road near Minter Street, Canterbury (outbound stop – 219376)    | • Remove bus stops 219376 and 219369  
• Convert existing bus stop 219369 to parking (+3 car spaces)  
• Convert bus stop 219376 to parking (+1 car space) |
| #91   | Canterbury Road near Minter Street, Canterbury (inbound stop – 219369)     |  |

5.2 Change 1 – Route 422: Retention of stops 221648 and 2217137, Princes Highway near Chandler Street and Harrow Road, Rockdale and Kogarah (#57 and #58)

5.2.1 Description
The proposal included removal of route 422 bus stops 221648 (#57) and 2217137 (#58) located on the Princes Highway, Rockdale and Kogarah. Opal data indicated an average 24-hour weekday demand of six passengers for 221648 (#57) and twelve for 2217137 (#58). Given the low usage compared to adjacent stops along the route an opportunity to optimise the spacing of stops at this location was identified in order to reduce delays.

Following a review of the submissions for these bus stops, it was identified that they provide an essential service for supported employees of the Intellectual Disability Foundation of St. George, and that increasing the walking distance to the next stops would impact on those with restricted mobility.

It is now proposed that bus stops 221648 (#57) and 2217137 (#58) be retained.

5.2.2 Environmental assessment
The retention of bus stops 221648 (#57) and 2217137 (#58) would not change the existing environmental conditions of the bus stops. No works would be carried out at the location of the existing stops and bus services would continue to operate as per existing conditions.

5.2.3 Revised management and mitigation measures
As described in section 5.2.2, no environmental impact is expected to result from the change to the proposal at this location and therefore no changes or additional mitigation measures to the REF are proposed.
5.3 Change 2 – Route 426: Retention of bus stops 220480, 220487 and 220430, Marrickville Road near Livingstone Road, Fletcher Street and Petersham Road, Marrickville (#79, #80 and #81)

5.3.1 Description

The proposal included relocation of route 426 bus stop 220480 (#79) about 60 metres south-east to the departure side of the Livingstone Road intersection. The current location of the bus stop on the approach to the Livingstone Road intersection was identified as less desirable as buses may not benefit from PTIPS (which extends the green time when a bus is approaching traffic signals).

The proposal also included removal of route 426 bus stops 220487 (#80) and 220430 (#81) located on Marrickville Road, near Fletcher Street and Petersham Road respectively. These bus stops were identified as being close to the preceding and following bus stops, presenting an opportunity to optimise bus stop spacing in order to reduce delays.

Following a review of the submissions for these bus stops, it was recognised that bus stops 220487 (#80) and 220430 (#81) should be retained given their relatively high levels of usage compared to other adjacent stops along the route and proximity to active land uses associated with the Marrickville town centre. Without the removal of bus stop 220430 (#81), the relocation of bus stop 220480 (#79) would have resulted in unsuitable spacing (about 100 metres) and is therefore no longer proposed.

5.3.2 Environmental assessment

The retention of bus stops 220480 (#79), 220487 (#80) and 220430 (#81) would not change the existing environmental conditions of the bus stops. No works would be carried out at the location of the existing stops and bus services would continue to operate as per existing conditions.

5.3.3 Revised management and mitigation measures

As described in section 5.3.2, no environmental impact is expected to result from the change to the proposal at this location and therefore no changes or additional mitigation measures in the REF are proposed.
6 Environmental management

The REF for the Bus Priority Infrastructure Program – Kingsgrove Bus Depot (routes 412, 422, 423, 426, and 428) identified the framework for environmental management, including safeguards and management measures that would be adopted to avoid or reduce environmental impacts (Chapter 7 (Environmental management) of the REF). No further measures were considered necessary as a result of the changes proposed under Chapter 5 (Changes to the proposal), however an additional safeguard has been included in response to those submissions raising concerns about the accessibility of new and relocated bus stops and those subject to significant alteration as a result of the proposal (SOE3 – outlined in bold below).

Should the proposal proceed, environmental management will be guided by the framework and measures outlined below.

6.1 Environmental management plans (or system)

A number of safeguards and management measures have been identified in order to minimise adverse environmental impacts, including social impacts, which could potentially arise as a result of the proposal. Should the proposal proceed, these management measures would be incorporated into the detailed design and applied during the construction and operation of the proposal.

A Project Environmental Management Plan (PEMP) and a Construction Environmental Management Plan (CEMP) would be prepared to describe safeguards and management measures identified. The PEMP and CEMP would provide a framework for establishing how these measures will be implemented and who would be responsible for their implementation.

The PEMP and CEMP would be prepared prior to construction of the proposal and must be reviewed and certified by environment staff, Sydney Region, prior to the commencement of any on-site works. The CEMP would be a working document, subject to ongoing change and updated as necessary to respond to specific requirements. The PEMP and CEMP would be developed in accordance with the specifications set out in: QA Specification G36 – Environmental Protection (Management System) and QA Specification G10 - Traffic Management.

6.2 Summary of safeguards and management measures

The REF for the Bus Priority Infrastructure Program – Kingsgrove Bus Depot (routes 412, 422, 423, 426 and 428) identified a range of environmental outcomes and management measures that would be required to avoid or reduce the environmental impacts.

Should the project proceed, the environmental management measures in Table 6-1 would guide the subsequent phases of the Bus Priority Infrastructure Program – Kingsgrove Bus Depot (routes 412, 422, 423, 426 and 428) development.
Table 6-1: Summary of environmental safeguards and management measures

<table>
<thead>
<tr>
<th>No.</th>
<th>Impact</th>
<th>Environmental safeguards and management measures</th>
<th>Responsibility</th>
<th>Timing</th>
</tr>
</thead>
<tbody>
<tr>
<td>GEN1</td>
<td>General - minimise environmental impacts during construction</td>
<td>A CEMP will be prepared and submitted for review and endorsement of the Roads and Maritime Environment Manager prior to commencement of the activity. As a minimum, the CEMP will address the following: • any requirements associated with statutory approvals • details of how the project will implement the identified safeguards outlined in the REF • issue-specific environmental management plans • roles and responsibilities • communication requirements • induction and training requirements • procedures for monitoring and evaluating environmental performance, and for corrective action • reporting requirements and record-keeping • procedures for emergency and incident management • procedures for audit and review. The endorsed CEMP will be implemented during the undertaking of the activity.</td>
<td>Contractor / Roads and Maritime</td>
<td>Pre-construction / detailed design</td>
</tr>
<tr>
<td>GEN2</td>
<td>General - notification</td>
<td>• All businesses, residential properties and other key stakeholders (eg schools, local councils) affected by the activity will be notified at least five days prior to commencement of the activity.</td>
<td>Contractor Roads and Maritime</td>
<td>Pre-construction</td>
</tr>
<tr>
<td>GEN3</td>
<td>General – environmental awareness</td>
<td>• All personnel working on site will receive training to ensure awareness of environment protection requirements to be implemented during the project. This will include up-front site induction and regular “toolbox” style briefings.</td>
<td>Contractor Roads and Maritime</td>
<td>Pre-construction / detailed design</td>
</tr>
<tr>
<td>SOE1</td>
<td>Construction related disruption</td>
<td>• A procedure will be implemented for managing the recording, review and response to construction related complaints.</td>
<td>Contractor</td>
<td>Pre-construction</td>
</tr>
<tr>
<td>No.</td>
<td>Impact</td>
<td>Environmental safeguards and management measures</td>
<td>Responsibility</td>
<td>Timing</td>
</tr>
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<td>-----</td>
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</tr>
<tr>
<td>SOE2</td>
<td>Access</td>
<td>• Access to residences, businesses and retained bus stops will be maintained.</td>
<td>Contractor</td>
<td>Construction</td>
</tr>
<tr>
<td>SOE3</td>
<td>Access and mobility</td>
<td>• The position, design and dimensions of new and relocated bus stops (and those existing stops subject to significant alteration as a result of the proposal) would be assessed by a suitably qualified person against the requirements of AS 1428.1-2001 <em>Design for Access and Mobility</em> (and any other associated relevant standards for bus stops as applicable). If site conditions preclude full compliance with AS 1428.1-2001, a design review will be conducted to ensure all practicable measures are implemented to address access and mobility requirements.</td>
<td>Roads and Maritime Contractor</td>
<td>Pre-construction / detailed design</td>
</tr>
<tr>
<td>BIO1</td>
<td>Unexpected threatened species impact</td>
<td>• An unexpected threatened species find procedure is to be developed for the proposal in accordance with the <em>Biodiversity Guidelines</em> (Roads and Traffic Authority, 2011)</td>
<td>Contractor</td>
<td>Construction</td>
</tr>
<tr>
<td>BIO2</td>
<td>Impacts to fauna</td>
<td>• Prior to removal, trees will be checked for nesting birds and arboreal mammals. If present, fauna would be relocated by a qualified wildlife handler.</td>
<td>Contractor</td>
<td>Construction</td>
</tr>
<tr>
<td>VIS1</td>
<td>Loss of street trees</td>
<td>• Opportunities to provide replacement tree plantings (William Street, Permanent Avenue) or otherwise mitigate streetscape impacts will be explored in consultation with the relevant local council.</td>
<td>Roads and Maritime</td>
<td>Pre-construction</td>
</tr>
<tr>
<td>VIS2</td>
<td>Construction related visual impacts</td>
<td>• Construction sites will be kept tidy and rubbish free.</td>
<td>Contractor</td>
<td>Construction</td>
</tr>
<tr>
<td>VIS3</td>
<td>Bus stop legibility</td>
<td>• Bus stop signage and other infrastructure will comply with applicable Transport for NSW requirements and standards.</td>
<td>Transport for NSW / Roads and Maritime</td>
<td>Detailed design</td>
</tr>
<tr>
<td>No.</td>
<td>Impact</td>
<td>Environmental safeguards and management measures</td>
<td>Responsibility</td>
<td>Timing</td>
</tr>
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</tr>
</tbody>
</table>
| NV1 | Construction noise and vibration impacts    | A Construction Noise and Vibration Management Plan will be prepared for the proposal. The plan will be in accordance with the Interim Construction Noise Guideline (Department of Environment and Climate Change, 2009) and will detail the specific measures to be implemented to reduce construction noise levels. The plan will cover aspects including  
  • Site noise planning  
  • Scheduling of high noise activities  
  • Operator instruction  
  • Plant maintenance  
  • Plant noise audit  
  • Notification of affected people (proposed work, location, duration of work, and hours involved)  
  • Process for investigating and responding to complaints  
  • Minimum safe working distances for vibration intensive plant  
  • Circumstances in which noise / vibration monitoring should be undertaken. | Contractor        | Pre-construction |
<p>| NA1 | Unexpected impacts on heritage values       | • The Standard Management Procedure: Unexpected Heritage Finds (Roads and Maritime Services, 2015) is to be followed in the event of uncovering a potential heritage item.                                                                                                                                | Roads and Maritime Contractor | Construction  |</p>
<table>
<thead>
<tr>
<th>No.</th>
<th>Impact</th>
<th>Environmental safeguards and management measures</th>
<th>Responsibility</th>
<th>Timing</th>
</tr>
</thead>
<tbody>
<tr>
<td>NAH2</td>
<td>Inadvertent impacts on known heritage items and unexpected impacts on heritage values</td>
<td>• Non-Aboriginal heritage awareness training would be provided for workers prior to commencement of construction work to communicate potential heritage items that may be impacted during works, and the procedure required to be carried out in the event of discovery of historical heritage materials, features or deposits.</td>
<td>Contractor</td>
<td>Pre-construction</td>
</tr>
<tr>
<td>NAH3</td>
<td>Impacts on sandstone kerbing</td>
<td>• Impacts to sandstone kerbing on Salisbury Road at Stanmore will be avoided where practicable. If direct impacts cannot be avoided, sandstone kerbing will be removed and relocated / reused in consultation with the relevant local council.</td>
<td>Roads and Maritime Contractor</td>
<td>Construction</td>
</tr>
<tr>
<td>ABH1</td>
<td>Disturbance of Aboriginal objects</td>
<td>• If Aboriginal heritage items are uncovered during the works, all works must cease in the vicinity of the find and the Roads and Maritime Aboriginal cultural heritage advisor and the regional environment manager contacted immediately. The steps in the <em>Standard Management Procedure: Unexpected Heritage Finds</em> (Roads and Maritime Services, 2015) must be followed.</td>
<td>Roads and Maritime Contractor</td>
<td>Construction</td>
</tr>
<tr>
<td>WQU1</td>
<td>Erosion and sedimentation</td>
<td>• Erosion and sediment control measures will be implemented and maintained in accordance with <em>Managing Urban Stormwater: Soils and Construction</em> (Landcom, 2004) to: • Minimise sediment moving off-site and sediment laden water entering any water course, drainage lines, or drain inlets. • Reduce water velocity and capture sediment on site. • Minimise the amount of material transported from site to surrounding pavement surfaces. • Divert off site water around the site.</td>
<td>Contractor</td>
<td>Construction</td>
</tr>
<tr>
<td>No.</td>
<td>Impact</td>
<td>Environmental safeguards and management measures</td>
<td>Responsibility</td>
<td>Timing</td>
</tr>
<tr>
<td>-----</td>
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<td>--------</td>
</tr>
<tr>
<td>WQU2</td>
<td>Erosion and sedimentation</td>
<td>• Erosion and sedimentation controls are to be checked and maintained on a regular basis (including clearing of sediment from behind barriers) and records kept and provided on request</td>
<td>Contractor</td>
<td>Construction</td>
</tr>
<tr>
<td>WQU3</td>
<td>Erosion and sedimentation</td>
<td>• Erosion and sediment control measures are not to be removed until the works are complete or areas are stabilised</td>
<td>Contractor</td>
<td>Construction</td>
</tr>
<tr>
<td>WQU4</td>
<td>Pollution from site runoff</td>
<td>• Vehicle wash down and concrete washout will occur at a dedicated location off-site.</td>
<td>Contractor</td>
<td>Construction</td>
</tr>
<tr>
<td>WQU5</td>
<td>Spills</td>
<td>• Refuelling and maintenance of vehicles will occur at a dedicated location off-site.</td>
<td>Contractor</td>
<td>Construction</td>
</tr>
<tr>
<td>WQU6</td>
<td>Spills</td>
<td>• An emergency spill kit is to be kept on site at all times. All staff are to be made aware of the location of the spill kit and trained in its use. If a spill or incident occurs, the <em>Environmental Incident Classification and Management Procedure</em> (Roads and Maritime Services, 2015) is to be followed and the Roads and Maritime Contract Manager notified immediately.</td>
<td>Contractor</td>
<td>Construction</td>
</tr>
<tr>
<td>AQU1</td>
<td>Dust</td>
<td>• Measures (including watering or covering exposed areas) will be used to minimise or prevent air pollution and dust.</td>
<td>Contractor</td>
<td>Construction</td>
</tr>
<tr>
<td>AQU2</td>
<td>Dust</td>
<td>• Vehicles transporting waste or other materials that may produce odours or dust will be covered during transportation.</td>
<td>Contractor</td>
<td>Construction</td>
</tr>
<tr>
<td>AQU3</td>
<td>Other emissions</td>
<td>• Construction equipment will be properly maintained to ensure exhaust emissions comply with the POEO Act.</td>
<td>Contractor</td>
<td>Construction</td>
</tr>
<tr>
<td>TTR1</td>
<td>Road safety and impacts to traffic flow.</td>
<td>• A traffic management plan will be prepared and implemented in accordance with <em>Traffic control at worksites</em> (Roads and Traffic Authority, 2010).</td>
<td>Contractor</td>
<td>Construction</td>
</tr>
<tr>
<td>No.</td>
<td>Impact</td>
<td>Environmental safeguards and management measures</td>
<td>Responsibility</td>
<td>Timing</td>
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</tr>
<tr>
<td>HZR1</td>
<td>Construction hazards and risks</td>
<td>• As part of the site specific CEMP, a Hazard and Risk Management Plan, including an emergency response plan, will be prepared. The plan will identify construction phase hazards and risks detail measures to mitigate those risks.</td>
<td>Contractor</td>
<td>Pre-construction</td>
</tr>
<tr>
<td>HZR2</td>
<td>Pedestrian safety</td>
<td>• A safety review of all new bus stop locations will be conducted during the design phase to identify whether any additional pedestrian safety measures are required.</td>
<td>Roads and Maritime</td>
<td>Design</td>
</tr>
</tbody>
</table>
| WMM1| Construction waste management      | • The following resource management hierarchy principles will be followed:  
  • Avoid unnecessary resource consumption as a priority.  
  • Avoidance would be followed by resource recovery (including reuse of materials, reprocessing, and recycling and energy recovery).  
  • Disposal would be undertaken as a last resort (in accordance with the Waste Avoidance and Resource Recovery Act 2001).                                                                 | Roads and Maritime Contractor | Construction |
| WMM2| Construction waste management      | • All wastes will be disposed of legally in accordance with their classification under the *Waste Classification Guidelines Part 1: Classifying Waste* (Department of Environment, Climate Change and Water, 2009)                                                                | Contractor           | Construction |
| CUI1| Construction phase cumulative impacts | • The CEMP will be revised to consider potential cumulative impacts from surrounding development activities as they become known. This will include a process to review and update mitigation measures as new work begins or complaints are received.                                      | Contractor           | Construction |
6.3 Licensing and approvals

Where required, an applicable road occupancy licence would be in place prior to commencement of works.

No other specific licencing/approval requirements have been identified.


---

10 The Department of Urban Affairs and Planning is now the Department of Planning and Environment
## Appendix A

### Respondents

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Submission No.</th>
<th>Section number where issues are addressed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Individual</td>
<td>1</td>
<td>3.27.4</td>
</tr>
<tr>
<td>Member of Parliament</td>
<td>2</td>
<td>3.1.2, 3.1.7</td>
</tr>
<tr>
<td>Individual</td>
<td>3</td>
<td>3.2.1</td>
</tr>
<tr>
<td>Individual</td>
<td>4</td>
<td>3.1.7, 3.10.1</td>
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<td>5</td>
<td>3.10.1</td>
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<tr>
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<td>6</td>
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<td>3.1.7</td>
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<td>3.28.1, 3.28.3</td>
</tr>
<tr>
<td>Individual</td>
<td>13</td>
<td>3.1.1</td>
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Appendix B

Updated concept drawings