

**Submission  
No 96**

**INQUIRY INTO PLANNING PROCESS IN NEWCASTLE  
AND THE BROADER HUNTER REGION**

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**Submission to NSW Legislative Council Inquiry into Planning  
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21 October 2014

Andrew Amos,

## Submission to NSW Legislative Council Inquiry into Planning process in Newcastle and the broader Hunter region

### Key Points

I strongly object to the Government's plan to truncate the Newcastle rail line. **Despite claims to the contrary, cutting the rail line does not appear to be necessary to meet any of the objectives of the Newcastle revitalisation strategy.** In fact, retaining the line would appear to enhance many of the objectives.

I believe that urban revitalisation of inner city Newcastle, precinct creation and connectivity between Hunter Street and the foreshore can be achieved without removing the rail line.

Connectivity between the foreshore and Hunter Street can be achieved at far lower cost than the cost of removing the rail line, freeing infrastructure capital for other much-needed regional transport projects.

Removing the rail line does nothing to improve public transport (and the strategy's objective of mode shift from car to public transport). The funds earmarked for removing the rail line should be spent on the established transport infrastructure priorities in the Hunter. These priorities include:

- Providing additional pedestrian level crossings on Newcastle rail line to improve connectivity between Hunter Street and the foreshore. Priority locations would be Worth Place and Steel Street.
- Constructing Glendale interchange
- Removing Scone rail level crossing
- Removing Stewart Avenue and Adamstown rail level crossings
- Replacing existing Adamstown and Kotara stations with a new station at the Kotara retail district
- A new easy-access ferry pontoon at Honeysuckle (Worth Place) so Stockton Ferry can operate on a loop route Stockton-Queens Wharf-Worth Place-Stockton and provide commuter service to the emerging commercial area at Honeysuckle
- Extending some Telarah train services to Paterson and providing a new low-cost station at Aberglassyn to service this rapidly growing dormitory residential area.

The proposed Wickham transport interchange, as exhibited in the Review of Environmental Factors in August 2014, does not measure up to the promises made the people of the Hunter as being a "world class" transport interchange that would provide "seamless" transfer between transport modes – train, bus, taxis and private cars. In fact, the exhibited plans for the interchange display provisions for bus transfer that are far inferior to those at the present Newcastle Station and many suburban rail stations.

While truncating the rail line is seen as desirable by a small number of high-profile developers and business people in Newcastle, there is substantial evidence that it is not desired by a significant proportion of the citizen community of the Hunter Valley.

Polls conducted by local media have consistently rejected the rail truncation decision and light rail proposal. These polls include:

- Poll by NBN TV 13 December 2012 found 69% of respondents did not agree with the government's decision to cut the rail line
- Poll by the *Newcastle Herald* over weekend of 15-16 December 2012 found 65% of respondents were more pessimistic about the future of Newcastle as a result of the decision to cut the rail line
- Poll by *Maitland Mercury* in December 2013 found that 72.8% of respondents did not agree that light rail was the right transport option
- Poll by the *Newcastle Herald* in May 2014 found that 72.7% of respondents did not like the hybrid route for the proposed light rail which involves running the light rail on Hunter and Scott Streets.

The consistent results in the 60%-70% range suggest that these polls are statistically valid indications of community dissatisfaction with the proposals.

Further the action group, Save our Rail, has collected some 11,000 petition signatures against the rail line truncation. There is no similar petition supporting truncation.

Currently there is a continuing stream of public comment and correspondence in local newspapers. The majority of this comment appears to be arguing against cutting the rail line and for other options that maintain the line, improve public transport usage and improve connection with the Honeysuckle precinct and the harbour foreshore.

## **This submission**

This submission covers:

- 1. The Fake Rail Line Barrier Issue.** The perception that the rail line is a barrier and must be removed as part of the revitalisation strategy.
- 2. Cutting the rail line at Wickham will reduce patronage**
- 3. What's going to happen to the rail corridor**
- 4. Proposed Wickham transport interchange**

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### **1. The Fake Rail Line Barrier Issue**

Over many years, it has been claimed that the existence of the rail line is the reason for the decline in the Newcastle CBD. However, the community does not agree. Many commentators, through letters to the Newcastle Herald have pointed to the far greater influence of other factors such as the

closing of Newcastle hospital and the development and expansion of suburban shopping centres like Kotara, Charlestown, Glendale and East Maitland (Greenhills). If these commentators are correct, removing the rail line will not prove to be the silver bullet solution that the small number of influential business and developer interests believe it will be.

The continued existence of the rail line does not prevent any of the key elements of the the revitalisation strategy being achieved. On the contrary improved rail access to the city and improvements to existing rail services, most likely, would enhance many of them as shown in the following comments on the Strategy's published objectives.

***Objective: Reshaping Hunter Street as main street.***

The existence of the rail line is no impediment to this objective. As the rail line runs parallel and adjacent to Hunter Street, it has potential to bring people to any location along Hunter Street and enhance this objective.

***Objective: Revitalising Hunter Mall***

Improving rail use has potential to greatly enhance the achievement of this objective. The rail line brings people right to the mall doorstep. Encouraging better rail patronage would help deliver this objective. Ask yourself why the Westfield group locates its Sydney shopping centres on rail lines? A little clever marketing by mall businesses could entice upper Hunter shoppers to travel to the Mall by rail, thus helping to compete these customers away from the other centres.

***Objective: Strengthen the Civic precinct***

Like Hunter Mall, the rail line brings people seamlessly right to the centre of the Civic precinct. As the Civic precinct is to be strengthened with a court complex and a university campus, it is simply absurd to consider removing rail as a long-term transport option. Rail access to Civic is a key to achieving the objective of strengthening this precinct. Rail also strongly services other Civic venues – the regional museum, the maritime museum, the foreshore restaurants and bars, the town hall, Civic Theatre and playhouse, art gallery and conservatorium of music.

***Objective: Positioning the west end as CBD centred of Birdwood Park & Cottage Creek***

The current Wickham station more centrally services this precinct than does the proposed Wickham transport interchange.

***Objective: Recognition of Newcastle's heritage as an asset***

Important elements of the existing rail infrastructure serving Newcastle, particularly Newcastle station, are important regional heritage assets. Even if the buildings are preserved and put to alternative use, removing rail diminishes the value of these assets by severing their functional connection with their original purpose.

**Objective: Creation of 10,000 more jobs and 6,000 more dwellings by 2036.**

Improved regional rail services provide effective long-term transport capacity to support this number of additional workers and residents.

**Objective: Promoting a university presence and education hub.**

Anyone who regularly uses the Maitland line sees first-hand how effective rail is as a transport mode favoured by the student population of the Callaghan campus. Large numbers of students from Maitland, upper Hunter, western Lake Macquarie, the Central Coast and, not by any means least, inner Newcastle travel to the Callaghan by rail using the station built in the 1990s at Warabrook. Rail is a much favoured transport option by students and, recognising this, removing rail as a means of transport to the new city campus is short-sighted and shows little appreciation of these students' transport preferences.

### **1.1 Improving connectivity has not even been tried**

The most common complaint is that the rail line is a barrier between Hunter Street and the foreshore and Honeysuckle. Regrettably, this recently has been fuelled by unfortunate, emotive and inappropriate comments from politicians, likening the rail line to the Berlin Wall and Newcastle to [war torn] Beirut.

Many commentators (especially in letters to the Newcastle Herald) have suggested that connectivity could be addressed by pedestrian only level crossings at Worth Place and Steel Street. The lobby group Save our rail has suggested these could be similar to one at Woonona and has a Youtube clip of it at <http://www.youtube.com/watch?gl=AU&hl=en-GB&v=2X7AcUEqkQc>.

There is also some suggestion that additional pedestrian level crossings cannot be installed because of safety concerns. Reliable technology for active level crossing gates has been in use since the late 1960s. Today, controlled by digital microprocessors, these systems are considered to be even more reliable. Every day, hundreds of pedestrians cross the Newcastle rail line at the existing level crossings at Beaumont Street Hamilton, Stewart Avenue Wickham and Merewether Street Civic. To my memory, there has not been a serious pedestrian incident or fatality at these crossings.

Surely additional crossings are worth trying before there is any commitment to removal of the line. They will certainly require far less capital expenditure and enable funds earmarked for removal of the line to be used on other transport projects that will enhance patronage and mode shift to public transport.

It is difficult to understand how the decision to remove the rail line because it is a barrier can be justified on both moral and economic grounds when adding crossings has not been properly evaluated or tried. Adding pedestrian level crossings must surely be possible at far lower cost than the proposed complete removal of the line and construction of a new bus rail interchange.

It is important to also realise that the rail line is not a barrier for access to the popular foreshore park in Newcastle East. On the contrary, rail delivers people right to that park and its role in doing so is

well evidenced at major events such as New Year's eve fireworks and numerous other events each year such as music concerts.

## **1.2 Mode shift to public transport**

It is almost impossible to comprehend how removal of the rail sits with the revitalisation strategy's objective increasing mode shift from private cars to public transport. Certainly, rail; transport in the Hunter needs some improvements and some are touched on briefly in this submission. With improvements like constructing the Glendale interchange, a new station for Kotara, better and larger station parking facilities and above all, active promotion, rail has enormous potential to provide an alternative to the car for a significant number of commuters to Newcastle.

I use the rail system to travel from Maitland to Wickham for work. It is reliable, fast, and with few exceptions, on time. I suspect its "on-time running" is better than in Sydney. Since the mid 1990s, there have been a number of improvements in the service, particularly the introduction of modern rolling stock, new stations at Metford and Warabrook and improved station access for people with mobility problems.

From questions I am often asked by non-rail users, I suspect many people do not really know how good it is - it's one of the Hunter's best kept secrets. Why? Because, unlike other State Governments, nothing has been spent by successive NSW Governments to actively encourage people to use rail – nothing has been spent on promotion. The observed growth in patronage over the last few years is occurring by some sort of autonomous osmotic process where people slowly discover rail and use it. Each morning as my new Hunter rail car train speeds across the Hexham wetlands, I look out the window at the bumper-to-bumper snail-paced traffic snarl on Maitland Road and wonder how many of those drivers could be on the train as well. One thing is for sure, I'm in town before them.

There is really something wrong with transport planning in NSW when the only answer to low patronage is removal of the service without even trying first to boost patronage. Struggling retailers don't just shut the door on the shop if sales start to decline, they try advertising and promotion first - ask Gerry Harvey. But in NSW if patronage is low, our planners and politicians just throw their hands in the air and say let's cut it (and this case let's spend somewhere between \$120m and \$600m doing so). This seems absolutely crazy when the numerous other transport improvement priorities listed elsewhere in this submission have long been identified as priorities and yet remain simply as items on a wish list.

The strategy's proposal to provide better bus-rail connections for services to the western Newcastle suburbs, John Hunter Hospital and eastern Lake Macquarie is welcome. But it does not require cutting the Newcastle rail line, a new interchange at Wickham and additional bus services to service Newcastle east and the CBD to do it. As outlined later in this submission, the proposed Wickham interchange as exhibited in the recent Review of Environmental Factors (REF) has virtually no capacity for seamless transfer to the Newcastle bus services. The interchange exhibited in the REF is really just a station with inadequate interchange capacity to buses, taxis and private cars. It falls far short of the promised "world class" interchange offering seamless transfer to other modes.

An alternative may be to create a bus interchange to service the western and southern areas at Hamilton using the railway land between Fern Street and the existing station. This would require removal of the existing demountable rail office. However, the site offers advantages such as use of existing rail land near the former Morrow Park bowling club as a bus layover, off-street connection to Industrial Drive via the disused rail corridor connecting with Branch Street Wickham and access across the existing Maitland Road rail overpass to Donald Street via Selma Street then connecting directly to the major western arterial, Griffiths Road. Such an interchange would provide a logical interchange point for to/from to Maitland line and western Lake Macquarie and Sydney rail services. Trains would continue to connect these areas to Newcastle.

### ***1.3 Deceptive and fanciful imagery***

Finally, I find the artist's impressions in the strategy document fanciful and, possibly, deceptive. As reported, recently in the Newcastle Herald, one participant at the recent Newcastle workshop questioned the number of images featuring street cafés and asked if that was what the vision for Newcastle is - "cafes everywhere". The images of an almost car-less Hunter Street are also fanciful and possibly delusional. With rail removed, traffic volumes are likely to increase, not diminish to the point where Hunter Street can be reduced to one lane each way. At Appendix A, I have taken one of these fantasy-land images of the current and future streetscape at Bank Corner and added a recent photo of my own showing the true current weekday daytime traffic at that location. The contrast between the current (and likely future) week day traffic reality and the images from the strategy documentation is stark.

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## **2. Cutting rail at Wickham will reduce rail patronage**

I very strongly believe that when the Newcastle line is cut at Wickham, there will be a reduction in rail commuter patronage and the gains of recent years will be lost. I believe this is so because interchanging will add significantly to journey times, particularly on outbound journeys (bus to rail interchange). Bus to rail interchange always requires latitude or headway for the bus to be delayed in traffic hence extending interchange time. Further if the bus is delayed, the train cannot wait without disrupting other train paths. So there are generally two consequences of bus to rail interchanging, longer interchange times and possibly missing trains. I lived on Sydney's north shore for many years and relied on bus to train connections and found this very frustrating at times.

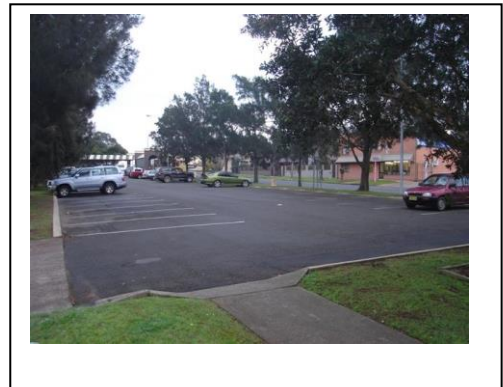
You only need to look at the current evening peak hour congestion on both Hunter Street and Honeysuckle Drive to see how likely it is that connecting buses will be delayed (and need long headways), even if bus lanes are provided. Besides, there is no capacity on Honeysuckle Drive for bus lanes.

There have been two shut downs of a week or more of the Newcastle spur line since 2010 for major maintenance. The alternative transport arrangements have been charter bus between Broadmeadow and the Newcastle city stations. Railcorp is to be complimented about the



organisation of these arrangements. The interchanging has been very slick with plenty of staff on hand to marshal passengers quickly between bus and train and very efficient bus operations. During these shutdowns, I have timed my journeys and the interchange times. Over 10 travel days, the average inbound interchange time – that is, train arrive to bus depart at Broadmeadow – was 4 minutes 40 seconds. By contrast, the average outbound interchange time - bus arrive Broadmeadow to train depart Broadmeadow – was 11 minutes 20 seconds , almost 3 times longer than the inbound interchange time. So even with a very well organised interchanging (and resource intensive in terms of marshalling staff), it adds significantly to the outbound journey in particular. It adds 50% to a journey between Newcastle and Thornton and 33% to journey to Maitland.

Overall, despite the slick operation of the Broadmeadow interchange, my journey times each way between Maitland and Wickham almost doubled over these 10 days. That is a significant disincentive to using public transport and certainly would not be sustainable long-term. You only needed to look at the commuter car park at Maitland station during the maintenance shutdowns mentioned above to see how many people abandoned the train during these shutdowns. The normally full car park had many empty spaces. This photo of the car park with many empty spaces was taken at 8.25 am on Friday 25 June 2010 during the last shutdown of the line between Hamilton and Newcastle.



I believe any interchange arrangement so close to the destination of most commuters would be a significant disincentive to working commuters. Right now with the train only journey, you can train it from Maitland to Newcastle in the same time as (or less than) you can drive in a car. That will not be the case, if the rail line is truncated at Wickham. Based on my experience above, interchanging is likely to add at least 11 minutes to the outbound rail journey, and introduce the possibility of missing a train connection if the bus is caught in traffic. These will be definite disincentives to working commuters using the train and stifle the current growth in rail commuter patronage. Commuters only need to have a couple of bad experiences on cold, wet winter evenings and they will be back in their cars.

Why care about the working commuters? Working commuters are important because they are the core of the full fare paying customer base. If you reduce working commuter patronage, there is a more than commensurate reduction in fare box revenue and this could ultimately threaten the financial returns for the whole Hunter line.

I provided this information and further information previously in submission in October 2012 to the NSW Transport Master Plan. A copy of that submission is attached as Appendix B.

### 3. What's going to happen to the rail corridor?

There were political undertakings that the rail corridor would be preserved “forever” for public use. Former Planning Minister, Brad Hazzard, was quoted in the media guaranteeing this.<sup>1</sup> However, the current Planning Minister, Pru Goward, has overturned that guarantee and announced that sections of the corridor will be available for development. This backflip demonstrates why any commitment by the current government, be it to retain the rail corridor or install light rail, is taken with a degree of mistrust.

Another popular suggestion is some sort of “green corridor” for cycle and pedestrian use. But does Newcastle actually need another cycle and pedestrian path just a stones throw from the still unfinished (and started in the 1980s) foreshore promenade? How will the businesses establishing along the foreshore promenade feel when a proportion of the pedestrian and cycle traffic past their businesses moves to the new “green corridor”? How inviting can this green corridor be made? Looking east along the rail corridor from the Merewether Street level crossing, it's hard to imagine it ever being anything but a sunless wind tunnel between the buildings.

Should the rail line truncation proceed, the best role for corridor is as the light rail route. Like the Sydney light rail to Lilyfield and the St Kilda light rail in Melbourne, which both use old rail infrastructure, using the existing rail tracks and overhead wiring infrastructure for the light rail would save millions of dollars in implementing the light rail decision. This is money that could be spent on the other transport priorities outlined at the start of this submission. It is absolutely ludicrous that millions of dollars will be spent relocating utility services and laying tracks and wiring for light rail in Hunter Street and Scott Streets when rail facilities already exist just metres away in the rail corridor.

The developer lobby claims that the Hunter Street route is preferable because the tram would run closer to businesses. However, the current map of the hybrid tram route along Hunter Street and Scott Street published by Urban Growth NSW shows only 4 “indicative” tram stops between Wickham and Newcastle Station.<sup>2</sup> This means that, regardless of whether the tram runs in the rail corridor or along Hunter Street, there will be a limited number of stops and most people will have to walk a similar distance to their destination once alighting from the tram on either route.

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### 4. Proposed Wickham Transport Interchange

I have examined the Review of Environmental Factors (REF) for the proposed Wickham transport interchange and find the proposal extremely disappointing in a number of aspects. My main observations are covered below.

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<sup>1</sup> Brad Hazzard is quoted in Newcastle Herald, 3 June 2014, as previously promising “*What we're really talking about here is a guarantee, no doubt about it, it stays in public ownership, and must remain as a potential corridor.*”

<sup>2</sup> See [http://www.revitalisingnewcastle.com.au/downloads/file/documents/TfNSW-NewcastleLightRail\\_FactSheet-small.pdf](http://www.revitalisingnewcastle.com.au/downloads/file/documents/TfNSW-NewcastleLightRail_FactSheet-small.pdf)

The people of Newcastle and the Hunter were promised a “world class” 21<sup>st</sup> Century multi-modal interchange for “seamless” passenger transfer between all modes of transport – train, bus, proposed light rail, taxi and private car. This objective is confirmed by statements in the REF such as “A key direction of this strategy [Newcastle Urban Renewal Strategy, Dec 2012] is to achieve an integrated transport solution ...” (Introduction, REF page 1) and “constructing and operating a new station at Wickham and a transport interchange for heavy rail, local buses, taxis and private vehicles ...” (Executive Summary, REF page ix). It is impossible to see how the proposed interchange will fully integrate these modes and provide the desired seamless transfer.

Instead, in order to shoe horn the interchange into a very limited site, the function of the interchange is seriously compromised and the proposed structure does not in any way represent a modern multi-modal transport interchange. Contrary to Minister Berejiklian’s recent comments that the design is functional, I contend that the proposed design is far from functional and far less so than the existing rail/bus ferry interchange arrangements at Newcastle Station. It is certainly not world class or 21<sup>st</sup> Century standard.

Section 5.1.1 and Figure 5.4 of the REF outline the features of the new station and interchange. Section 5.1 (REF page 34) states:

*“The interchange would include:*

- *a taxi rank on the southern side of Station Street*
- *a bus stop at the eastern end of the new station concourse.*
- *a kiss and ride area for private vehicles also on the southern side of Station Street*
- *provision for future light rail interchange connection in Beresford Street.”*

The most glaring deficiency is the totally inadequate provision for interchange to the bus services currently servicing the Newcastle CBD and Honeysuckle and connecting to rail services at Newcastle Station. As the REF states in the extract above, there is only a single bus stop the width of the eastern end of the station concourse. As such it will occupy little more than the distance between the current rail boom gates – enough for perhaps 2 buses at a pinch.

In addition to undercover direct passenger transfer between train and bus, a good train-bus interchange would have the following features for transfer to/from local bus services as a minimum.

- Ability to load/offload a number of buses concurrently to facilitate seamless and timely transfer to/from multiple bus destinations.
- Access that enables buses to enter and exit the interchange in various directions to ensure direct bus access from and to multiple route destinations, and
- Layover capacity to ensure buses are available to promptly connect with incoming trains.

The proposed interchange has none of these features and, in this regard, is a substantial step backwards from the train-bus interchange facility currently available at Newcastle railway station in the CBD. As discussed later in this submission, it is doubtful whether the proposed design of the

interchange also has the capacity to provide under cover transfer of passengers between train and local buses.

According to the REF, Newcastle Buses operates some 30 route services between Newcastle and the suburbs. There is no way that this single small bus stop at the eastern end of the concourse can be considered adequate for interchange to Newcastle's extensive bus network as well as other services to Cessnock (Rover Coaches) and to Raymond Terrace and Port Stephens (Port Stephens Coaches) as well as services operated by Hunter Valley Buses and Busways. I note from Table 6.1 (REF page 50) that none of the bus operators are listed as being involved in the stakeholder consultation activities during the REF preparation, which I find quite astounding because they are obvious major stakeholders. It is even more astounding when the light rail design team were included for the as yet non-existent light rail but not bus operators for the existing extensive bus networks.

The short single bus stop at the proposed interchange is a pitiful replacement for the 6 stand bus interchange at the present Newcastle Station, which caters for all bus services mentioned in the previous paragraph as well as long-haul services connecting to Stroud, Taree, Forster, Tuncurry, Tea Gardens and interstate and country destinations. It is certainly inadequate for a modern functional transport interchange.

Further, it is unclear how Newcastle buses will exit this stop for most suburban destinations as there is no nearby opportunity for buses to exit the interchange in the reverse direction of entry. Buses will be stopped at the station facing north on Stewart Avenue, meaning most will be headed away from their destinations. There does not appear to be any provision for U-turn facilities via Honeysuckle Drive on any other nearby intersection. This is likely to mean most buses will need to take some rather circuitous detour in order to commence a direct route to their destination suburbs.

Again by contrast, the existing bus interchange at Newcastle Station has an exit onto Wharf Road adjacent to the Wharf Road/Watt Street roundabout, allowing exit in the reverse direction of entry.

It would seem that the only way bus connectivity equal to that provided by the existing interchange at Newcastle could be provided would be by resuming some adjoining property. That could provide additional bus stop bays, a bus lay-over area and permit right turn exit from the interchange onto Stewart Avenue so that buses can exit the interchange in the direction of their destination. Another option may be to use vacant land on the opposite side of Stewart Avenue for extended bus interchange facilities although this will hardly provide the seamless undercover passenger transfer between train and bus that would characterise a modern interchange.

The REF points out that some thirty bus routes connecting Newcastle and suburbs run along Hunter Street (Section 7.2.2, REF page 58). This statement, along with the totally inadequate bus stop at the eastern end of the station concourse strongly suggests that the intent is to have bus passengers join local buses at kerbside stops on both sides of nearby Hunter Street. Indeed, with the inadequate bus stop designed into the interchange, it is the only practical way of connecting to the 30 local bus routes serving the city and the bus services to Cessnock and Port Stephens. Connecting to buses on Hunter Street will mean passengers will have to cross Hunter Street to connect with outbound bus services. For transferring passengers, this will mean waiting at pedestrian crossings and in exposed

bus shelters in all weather. That is not how a modern interchange should function – all transfers should be close and under one roof. If bus connection to most Newcastle routes involves passengers connecting with buses at kerbside bus stops on Hunter Street, then the interchange substantially fails the objective of being a modern fully integrated transport interchange providing seamless passenger transfer between transport modes.

All the above points about rail and bus integration highlight how the issue of properly integrating the city's rail and bus transport systems appears to have been completely overlooked in the rail truncation decision at all levels - political, transport planning and in the conceptual development of the rail truncation plan.

Access to and from the interchange by private cars and taxis is also far less than desirable for a modern interchange. The proposed access is awkward on narrow side streets for taxis and private vehicles (kiss and ride set down/pickup) and has no short-term parking facilities for people waiting to collect passengers from inbound services. These narrow streets are occupied by a mixture of commercial and residential properties with limited off-street parking. They are also close to office buildings at the northern end of the Honeysuckle business precinct and are used by some workers from these offices for free all-day parking. This means that, during business hours, these narrow streets are further confined by parking on both sides of the street. Due to the nature of the businesses in these streets, they are also used extensively by trucks and have trucks parked and loading/unloading in the streets, on occasions by forklift trucks using the road space.

Private vehicle and taxi access requires convoluted entry by Bishopsgate Street and Charles Street. Bishopsgate Street can only be entered from Hannell Street (Stewart Avenue) by traffic travelling north on Hannell Street. Southbound traffic on Hannell Street will have to use other narrow back streets to access the station entry – such as Throsby Street, Union Street, Bishopsgate Street then the one way Charles Street. Similarly traffic exiting the interchange wishing to travel south or to Stewart Avenue, Hunter Street or Honeysuckle Drive will have to exist via the Throsby Street/Hannell Street intersection. Such convoluted entry and exit on these narrow backstreets for private vehicles and taxis cannot be regarded as functional and appropriate to 21<sup>st</sup> century interchange design by any stretch of the imagination.

I have attached some photographs at Appendix C to support my views.

**Submitted by:**  
**Andrew Amos**

**21 October 2014**