

17 December 2014

The Hon. Prudence Goward
Minister for Planning
Department of Planning and Infrastructure
23-33 Bridge Street
SYDNEY, NSW 2000

Attn: Ingrid Ilias

The Hon. Prudence Goward,

RE: Submission – CBD and South East Light Rail Modifications (SSI- 6042 MOD 1)

1 Introduction

This submission is prepared on behalf of Brookfield Commercial Operations (Brookfield), as the managing agent on behalf of the owners of 680 George Street, 50 Goulburn Street, 52 Goulburn Street, and 644 George Street, Sydney.

As a key stakeholder in the Sydney CBD, Brookfield welcomes the opportunity to comment on the public exhibition of the CBD and South East Light Rail Project (CSELR) Modifications Report. Brookfield supports the expansion of the Sydney light rail network and the introduction of light rail into the Sydney CBD, however is greatly concerned regarding a key element of the proposed modifications to the CSELR, being the removal of the World Square light rail stop.

This submission provides the following:

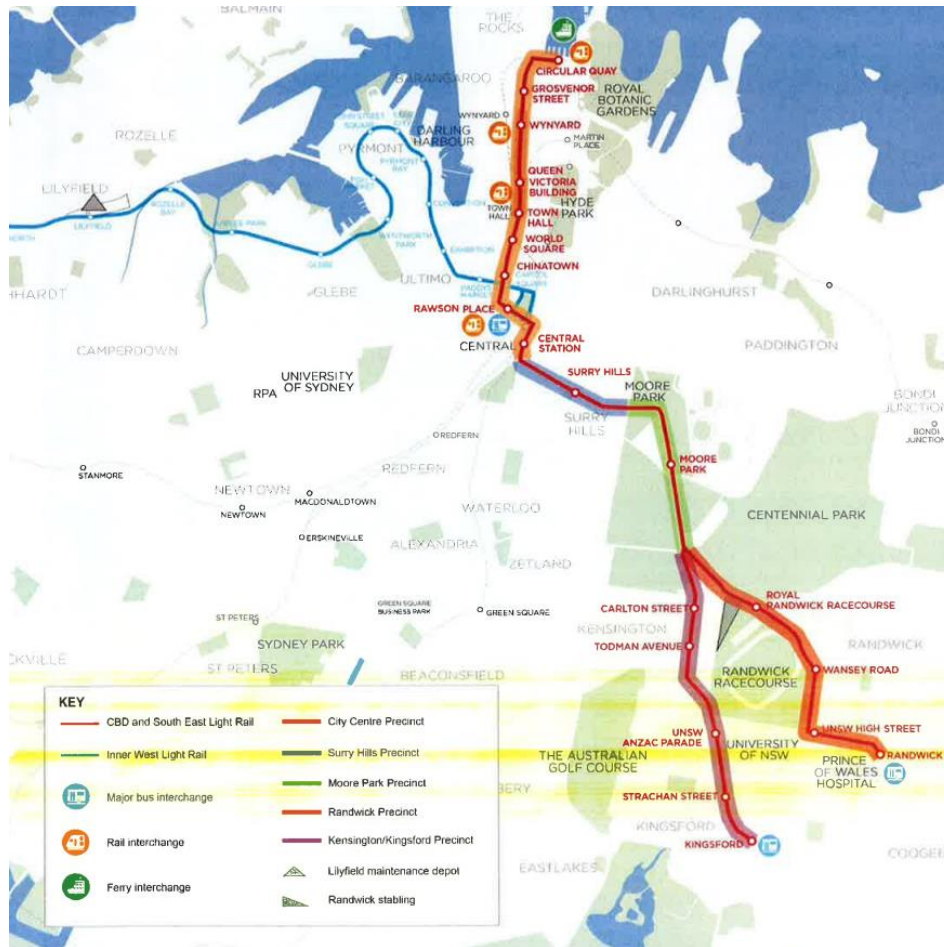
- A description of the CSELR project as approved and the proposed modifications;
- An outline of concerns regarding the proposed justification for the removal of World Square, in particular:
 - The proposed proximity to Town Hall and Chinatown stops and the extraordinary density and pedestrian activity that exists and is planned for within the precinct;
 - The significant anticipated patronage of the World Square stop;
 - The continued requirement and demand for the World Square stop despite engineering constraints and the lack of information provided regarding these constraints;
- A summary of recommendations that Brookfield would seek to see addressed as part of the planning process.

2 Project Background

Planning Approval was originally granted for the CSLER project by the Minister for Planning on 4 June 2014. This approval included a light rail stop at World Square, consisting of a single, central island platform within the middle of George Street located approximately 20 metres north of the George and Liverpool Street intersection.

The EIS prepared by Parsons Brinckerhoff which accompanied the original SSI Application states that the proposed stops within the City Centre Precinct would be located between approximately 180 metres and 450 metres apart. The EIS particularly notes that stops are proposed at more frequent intervals in the CBD in response to significant densities and the larger number of destinations and trip generators. As such, the approved World Square stop is located approximately 200 to the south of the approved Town Hall stop and approximately 325 metres to the north of the Chinatown stop. The approved light rail network can be seen below in Figure 1.

FIGURE 1 – CSELR NETWORK AS APPROVED



The City of Sydney did not raise any concern regarding the proposed location of the World Square stop within their two formal submissions made on the original CSLER application. Further, within the Preferred Infrastructure Report Transport for NSW (TfNSW) defended the provision of the stop despite its proximity to Town Hall by stating that the assessment process for the selection of stops initially involved the development of a long list of stop locations for the CSELR which were assessed against a broad list of criteria. This criterion included, although was not limited to, site constraints such as topography and access arrangements, stakeholder input, potential walk catchments, and the overall and average distance between potential stops.

Design changes are now proposed to the CSELR project in response to further design investigations and consultation with certain stakeholders. Most significantly for Brookfield is the proposed removal of the World Square stop.

3 Response to Transport for NSW Justification for Removal of World Square Stop

Within the Modifications Report, three factors were provided to justify the removal of the World Square light rail stop, including:

- The proposed World Square stop is located approximately 200m to the south of the Town Hall Light rail stop and approximately 325m to the north of the Chinatown stop.
- The proposed World Square stop would generate a lower patronage than the Chinatown and Town Hall stops.
- The gradient of George Street at the proposed location of the approved World Square stop requires substantial street regrading to accommodate a fully *Disability Discrimination Act 1992* (DDA) compliant stop.

As such, TfNSW has deemed it appropriate to remove the proposed World Square stop from the CSELR network.

We question the validity and substantive weight given to the first two points and we specifically respond to these factors in the following sections. Further, we encourage the NSW Department of Planning and Environment to oblige TfNSW and the City of Sydney Council to investigate additional works to ensure that the future light rail stop achieves full DDA compliance, whilst satisfying the demonstrated demand for this stop as outlined in the following sections.

3.1 PROPOSED PROXIMITY TO TOWN HALL AND CHINATOWN FUTURE LIGHT RAIL STATIONS

“Town Hall stop is approximately 200 metres to the north and Chinatown stop is approximately 325 metres to the south... The stop is therefore proposed to be removed as part of the modification to the approved project due to the low expected patronage, proximity to adjoining stops to the north and south (Town Hall stop and Chinatown stop respectively) and substantial engineering constraints” – Modification Report Pages 14 - 15

Although the distance between Town Hall and World Square is relatively short (approximately 200 metres), it is completely in keeping with the existing and projected density of this precinct and its proximity to major destinations and trip generators. Despite the original EIS stating that stops located within the City Centre Precinct would be located approximately 180 metres and 450 metres apart based on densities and trip generators, the proposal seeks to remove a stop in one of the most active and dense precincts in Sydney.

Should the proposed modification be approved in its current form, the World Square precinct and surrounds will observe approximately 550m between light rail stops. This is incongruent with not only the CBD location of the stop, but the significant existing and planned density of this precinct as outlined in Section 3.2. Further, if the justification for the removal of the station in its entirety can be based on proximity, we question the requirement for the Queen Victoria Building, Grosvenor Street, and Rawson Place stops, each of which are located within similar proximity to a nearby light rail stop. Clearly, the proximity to nearby stops was assessed as part of the original SSI Application and the demand for the World Square stop was justified, as was similar stations such as at the Queen Victoria Building. As such we assert that the approved stop pattern within the densest locations in the CBD is completely justified, and is not a valid reason for the removal of the World Square stop.

The location of the approved World Square light rail stop being within close proximity to other high patronage areas such as Town Hall will also provide customer relief for these stops, and will also

provide transport options for those visitors travelling from SICEEP and the IMAX development into the CBD. The approved location of the World Square stop is in close proximity to Liverpool Street, which provides a much more accessible route from the CBD to Darling Harbour and the new development proposed around SICEEP, compared to the much steeper Druitt and Bathurst Streets. By removing the approved World Square stop, TfNSW is compelling more pedestrians to travel on Druitt and Bathurst Streets, limiting the opportunities for more comfortable pedestrian routes. The east/west accessibility of the World Square precinct has not been addressed within the Modifications Report and should be considered when assessing the proposed removal of this key station.

3.2 PROJECTED PATRONAGE

3.2.1 OVERVIEW

“Further investigation since the approval of the project has identified that the World Square stop would generate a lower patronage than the closest stops to the north and south” – Modification Report Page 14

The Modification Report suggests that the World Square light rail stop is likely to generate less patronage than the two nearest stops being Town Hall and Chinatown, and that this is to be used as justification for its removal.

The ‘further investigation’ that the Modification Report references should be made available, as World Square welcomes over 25 million people per year through the precinct, and has over 100 retail specialty shops and 90,000sqm of A Grade commercial floor space (Source: World Square Shopping Centre Manager Traffic Counters). Approximately 15,000 people reside within 500m of the approved World Square light rail stop, compared to approximately 13,000 residents within 500m of the approved Rawson Place stop and 10,800 persons within 500m of the approved Surry Hills stop (ABS Census of Population and Housing 2011).

Within the same approximate radius (based on Bureau of Transport Statistics travel zones), the residential population around the approved World Square light rail stop is anticipated to grow from 15,359 in 2011 to 19,025 in 2036. Further, the employment figures within this catchment are predicted to grow from approximately 41,556 to 50,513 from 2011 to 2036 (Bureau of Transport Statistics).

The World Square precinct further experiences significant pedestrian volumes, comparable to Pitt Street Mall. As noted in the study commissioned by the City of Sydney The Public Spaces – Public Life Sydney (2007), George Street south of Bathurst Street experienced greater pedestrian volumes than Pitt Street Mall on Winter Weekdays and at Summer Saturdays. Further, whilst Pitt Street Mall attracts approximately 65,000 people per Summer weekday, George Street south of Bathurst Street welcomes approximately 46,500 people per Summer weekday (8:00am to 12:00am) and is also one of the busiest streets at the late night peak in Sydney CBD (unlike Pitt Street Mall), as discussed throughout this section.

In addition to these compelling pedestrian counts, recent results from the Shopping Centre News (Mini Guns 2014) confirmed that the World Square Shopping Centre had the highest turnover per sqm of any centre in Australia, beating the Queen Victoria Building. Whilst it is possible that interchanges and visitor destination hubs such as Town Hall and Chinatown would experience significantly high patronage potential, this does not challenge the significant demand for public transport at World Square.

As such, we reject the notion that the World Square light rail stop would demand so little patronage to warrant its removal, especially having regard to the removal of the vast majority of bus routes from George Street.

3.2.2 EXISTING WORLD SQUARE PRECINCT

Entertainment Precinct and Destination

The World Square precinct is an entertainment precinct of global standard for the Sydney CBD. The precinct welcomes over 25 million people per year, more visitors annually than each of the Sydney domestic and international airports. The precinct includes not only the World Square Shopping Centre and Ernst and Young Centre, 50 Goulburn Street and 52 Goulburn Street, but popular night time destinations such as the Event Cinema complex, the Metro Theatre, multiple licensed premises, and several hotels.

Visitors during the Saturday night time peaks at George Street South (Central St) exceed peak daytime volumes. For instance, the highest peak pedestrian rate recorded by a City of Sydney study found that at midnight on a Saturday night in December, the pedestrian rate for George Street around World Square was equivalent to the evening peak hour at Martin Place in summer (City of Sydney, Future Directions for Sydney at Night 2012). The table below taken from the discussion paper informing "OPEN Sydney: Future directions for Sydney at night" shows the top 10 places for people per hour for both March and December 2010 count periods. This table notes that at George Street, in close proximity to the approved World Square Light rail stop, was three of the top four highly populated areas at night within Sydney LGA.

FIGURE 2 – TOP 10 PLACES FOR PEOPLE PER HOUR FOR BOTH MARCH AND DECEMBER 2010 COUNT PERIOD (PARSONS-BRINCKERHOFF (2011) LATE NIGHT MANAGEMENT AREAS RESEARCH – CITY OF SYDNEY)

Rank	Phase	Precinct	Location	Day	Hour commenced	Persons per hour
1	2 (Dec)	CBD South	George St at Central St	Saturday	12am	7564
2	2 (Dec)	Oxford Street	Oxford St (IGA)	Friday	11pm	6860
3	2 (Dec)	CBD South	George St at Central St	Friday	12am	6848
4	2 (Dec)	CBD South	George St at Central St	Saturday	11pm	6576
5	1 (Mar)	Kings Cross	Bayswater Rd between Kellett St & Ward Ave	Saturday	1am	5948
6	2 (Dec)	Kings Cross	Darlinghurst Rd south of Roslyn St	Saturday	1am	5880
7	1 (Mar)	Kings Cross	Darlinghurst Rd north of Bayswater Rd	Saturday	12am	5845
8	2 (Dec)	CBD South	George St at Central St	Friday	11pm	5832
9	1 (Mar)	Kings Cross	Darlinghurst Rd between Roslyn St and Bayswater Rd	Saturday	12am	5620
10	2 (Dec)	Kings Cross	Bayswater Rd east of Darlinghurst Rd	Saturday	1am	5400

This is just one example used to demonstrate the significant volumes of visitors and pedestrian traffic the World Square precinct receives. Considering the removal of the bus routes along George Street to accommodate the light rail network, this proposed modification significantly reduces the immediate access to this precinct that it both currently enjoys and requires to support the substantial trip generators and destinations along George Street.

"OPEN Sydney: Future directions for Sydney at night" recognises the significant role public transport options have in maintaining safer public streets, particularly in active night time and late night activity hubs. Specifically the document notes the following:

"There is a link with safety and security and good transport options. Hadfield (2011: 162) notes: "Poor availability of late-night transport means people are required to spend longer in nightlife areas after bars and nightclubs have closed, and leads to frustration and competition for scarce transport resources and also the use of unsafe methods returning home." It is this frustration noted by Hadfield which can make late-night transport hubs "flashpoints" for violence."

Whilst it is not suggested that World Square is a violent destination, the precinct is home to many licensed premises and night time entertainment venues, in addition to being a significantly dense environment. As demonstrated above, the precinct sees the most populated street during night time peaks in Sydney. The proposal seeks to rely on the Town Hall and Chinatown stops to support the transport needs of this visitor population (in addition to the considerable residential and employment population both existing and proposed).

This impact is not considered within the Modifications Report, and we suggest that it will have a dramatic impact on pedestrian patterns in the area, crowds along George Street, and accessibility to a considerable entertainment precinct. Simply expanding the footpath north of World Square, although supported, is not sufficient to accommodate the need for this stop.

“OPEN Sydney: Future directions for Sydney at night” also notes that whilst pedestrian volumes in some places exceed daytime crowds, only 6 per cent of people in our city after 11pm were aged 40 or over. Serious consideration must be given to the impact the removal of a light rail station will have on the visitor rate to the World Square precinct, particularly as bus routes are moved from George Street.

Residential, Worker and Student Population

As demonstrated above, the World Square precinct welcomes a significant number of visitors and high pedestrian volumes. In addition to the transient population found within the CBD South, the precinct around World Square is also a significantly dense environment. The following three images demonstrate the significant residential, worker, and student populations located around a 250m radius of the approved World Square light rail stop. As clearly demonstrated, this area is not only the home of 90,000sqm of A Grade commercial floor space but is also one of the most dense residential precincts within Central Sydney and Australia.

Further, Figure 5 shows that the precinct is not only a significantly dense area, but also has a high proportion of university students, who would likely use the light rail network (to UNSW, UTS, and potentially to the University of Sydney in an expanded network).

The Modifications Report suggests that the World Square stop will not have a significant patronage, compared to Town Hall and Chinatown stops to warrant its location. Based on both the existing significant worker, residential, and student densities at World Square, in addition to the significant visitor population to World Square, we sincerely believe that the World Square stop will have significant patronage. Despite the existing density, the precinct is also predicted to grow significantly, as discussed in the following section.

FIGURE 3: SYDNEY LGA POPULATION DENSITIES

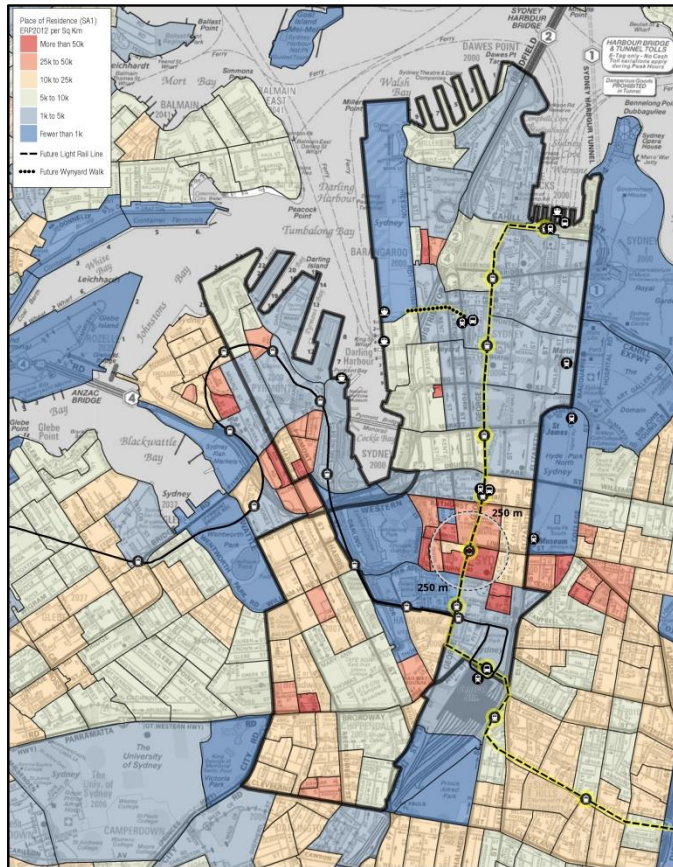


FIGURE 4: SYDNEY LGA EMPLOYMENT DENSITIES

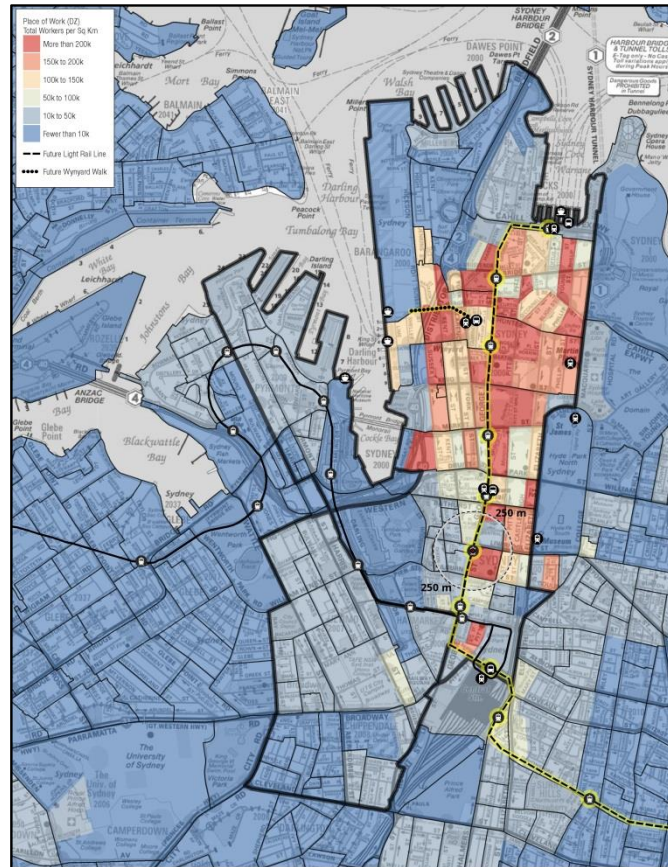
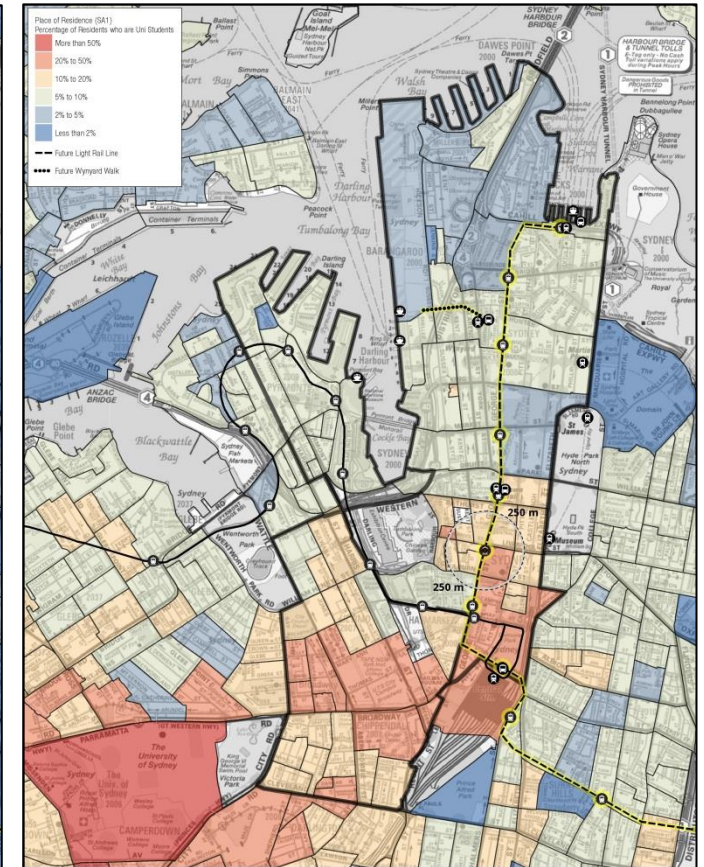


FIGURE 5: SYDNEY LGA POP. THAT ARE TERTIARY STUDENTS



3.2.3 PROJECTED GROWTH

In addition to the existing residential density and employment numbers for the surrounding context, there are several large scale projects proposed and planned within proximity of World Square that are likely to further increase the density of the area. These are summarised below:

Mirvac Event Cinema's George Street:

- 78 storey mixed use tower, comprising 53,400sqm of residential floor space, 10,900sqm of retail floor space and community facilities.
- Proposal has been endorsed by Council and is proceeding through the Planning Proposal process with the state government (approximately 18 months until gazettal of new legislation to be followed by a design competition and a DA).

Imax Theatre Redevelopment:

- 2017 completion target.
- 62,000sqm of GFA including 7,000sqm of retail (4,600 workers).

Sydney International Convention, Exhibition and Entertainment Precinct:

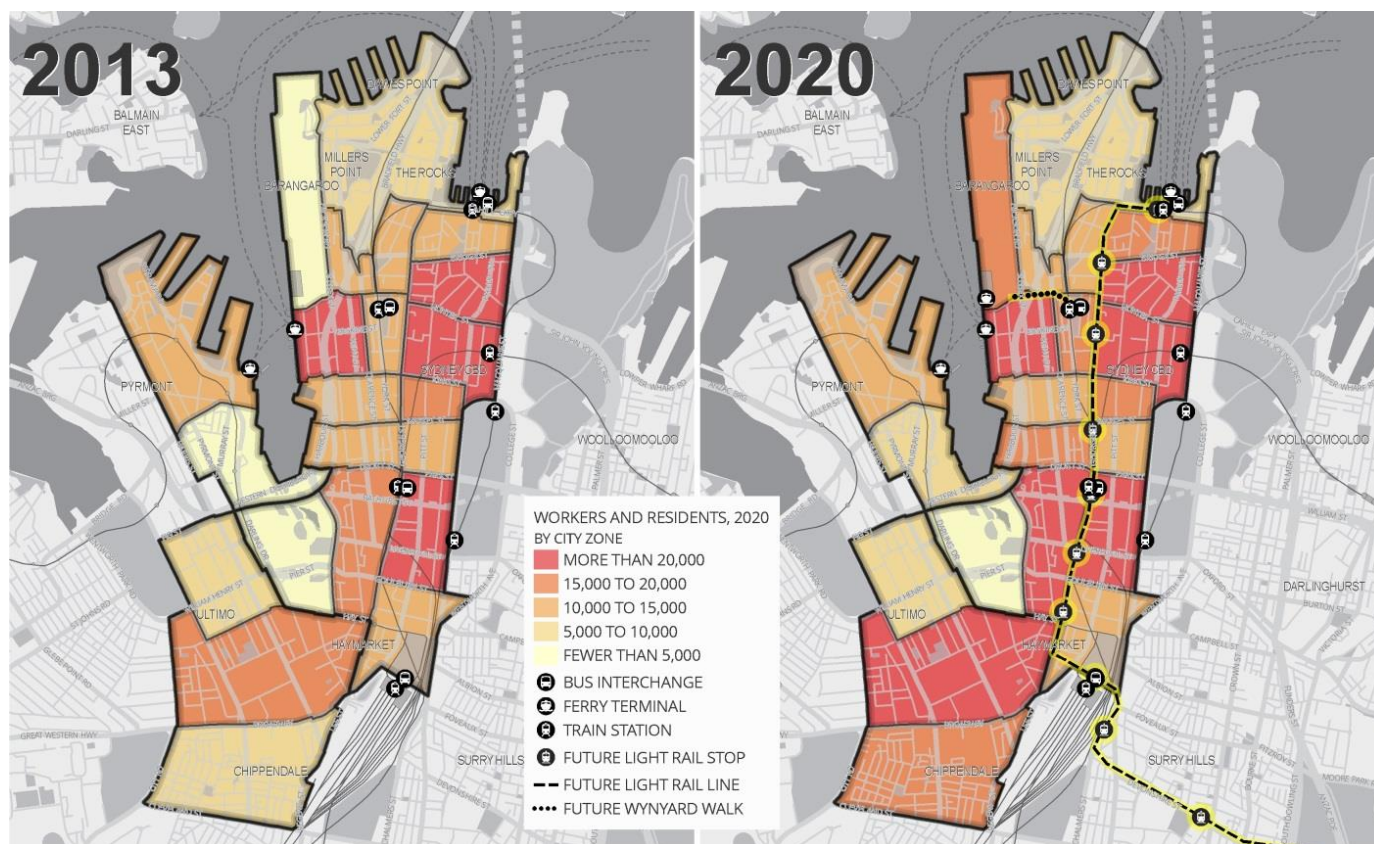
- 2016 completion target (currently under construction)
- 38,000sqm of commercial
- 1,260 residential units
- 4,200 workers, 2,700 residents

These significant projects, in addition to substantial residential developments recently approved such as the Greenland Centre on Bathurst Street, will substantially increase the residential and worker population of the precinct. Moreover the City South area is subject to significant development controls under the *Sydney Local Environmental Plan 2012*. For instance the area to the south of Bathurst Street and east of George Street has a maximum height of buildings control of 235 metres and a significant FSR provision (located within Area 2 under Clause 6.4 of the *Sydney Local Environmental Plan 2012*). The World Square precinct therefore has in reality significant potential for growth and expanded density, even compared to other precincts within the CBD.

The following images at Figure 6 demonstrate the predicted change in residential and worker density between 2013 and 2020. As illustrated in these plans, the area located immediately surrounding the approved World Square light rail stop is planned for significant growth, commensurate to what you would expect at Wynyard Station and the financial precinct.

It is therefore undisputable that the World Square precinct is characterised by a significant residential, student, and worker population and is capable of substantial growth based on the significant number of proposed developments and existing planning controls for the area. As such, the provision of a light rail stop in this location is completely justified, despite assertions that the patronage will be less than that of Town Hall (notably a major transport interchange).

FIGURE 6: PREDICTED CHANGE IN DENSITY 2013 – 2020 (URBIS ANALYSIS BASED ON ABS DATA)



3.3 DISABILITY ACCESS

“the gradient of George Street at the proposed location of the approved World Square stop requires substantial street regrading to accommodate a fully Disability Discrimination Act 1992 (DDA) compliant stop. This includes the need to raise the Liverpool Street and George Street intersection and other changes to the existing level of the local road network including a number of retaining walls” – Modification Report Page 14

The gradient of George Street at the World Square location has been known since the original SSI application. The EIS included within the original SSI Application noted that for stops located within road corridors, access ramps were designed with a gradient of five per cent or less, or where the stop is constrained, ramps would be provided at a gradient of 1 in 14. The EIS further acknowledged the following:

“The existing street gradient means that street regrading would be necessary to accommodate a fully DDA compliant stop. The light rail tracks would be raised at the Liverpool Street and George Street intersection, to minimise the extent of cut into the existing road level. The island platform and tracks would be at an approximately 2.5 per cent gradient, would be cut into the existing road level up to approximately 330 millimetres, then tie back into existing street levels.”

As such significant work was undertaken to ensure that the proposed light rail stops could achieve, even in principle, DDA compliance. The original EIS outlined that the proposed locations of the some 20 stops along the CSELR were assessed against a wide range of criteria, and despite these engineering constraints it was determined that the demand for the World Square stop outweighed the additional cost for street and intersection regrading. The Modifications Report does not sufficiently explain the extent of works now required (and what

has changed since the original approval), and further does not investigate further options such as minor revisions to the location of the stop, compared to removing the stop in its entirety.

As such, we request that further information is made available to ascertain why the engineering works are now considered unachievable.

Whilst it is acknowledged that the approved location for the World Square light rail stop is not flat, it has to be detailed that removing an approved light rail stop at a significantly dense environment that does experience an incline, is not the best outcome to achieve a more accessible public domain. The demand for the stop exists, and as such equitable access should not be used as an excuse not to provide this service. We implore the NSW Department of Planning and Environment to oblige TfNSW and the City of Sydney Council to investigate options to ensure that the required light rail stop at World Square achieves full DDA compliance.

4 Other Concerns

As demonstrated in Section 3, we argue the validity of the three factors provided by the proponent to justify the removal of the World Square light rail stop in its entirety. In addition to these comments, we would also like to raise the following issues relating to the Modification Application and the proposal to remove the World Square light rail stop:

- The cumulative impact of the removal of the stop on public transport accessibility to World Square.
- The insufficiency of the information provided within this modification application.
- The inadequate public exhibition period given the substantial changes proposed.

4.1 CUMULATIVE IMPACT

As outlined throughout this submission, the existing World Square precinct currently benefits from a high level of accessibility. As outlined in the original EIS supporting the CSLER:

“There are currently 290 bus services operating along George Street (in the peak direction). In addition to these services, Sydney Sightseeing tourist coaches operate along the George Street corridor.”

According to the Sydney City Centre Access Strategy, with the introduction of light rail on George Street, the nearest key bus corridor to World Square will be along Castlereagh/Elizabeth and Park Streets. As such, an area between Castlereagh Street, Town Hall, SICEEP, and Chinatown will be without direct access public transport, restricting access to one of the densest precincts in Sydney. This level of public transport accessibility is completely incongruous with the role the World Square precinct currently plays within the Sydney CBD and its future growth potential due to its strategic proximity to recently approved high rise residential and mixed use development, SICEEP, IMAX, Event Cinemas, and of course World Square Shopping Centre.

We request that the projected patronage of the light rail stops is outlined within the proponent's Preferred Infrastructure Report. This is particularly important as the World Square stop is likely to not only support a significant population and worker base, but will also ease the already significant pressure experienced at Town Hall station (second busiest train station in NSW).

The proposal suggests that the widening along both sides of George Street between Wilmot and Bathurst Streets would minimise any adverse effects as a result of the change in pedestrian volumes. This suggestion is inadequate to account for the significantly reduced public transport accessibility of this precinct, particularly for World Square, which is located relatively equidistant between Town Hall and Chinatown stops.

4.2 INSUFFICIENT INFORMATION

In order to justify the removal of an approved light rail stop adjacent to one of the most densely populated city blocks in Australia, the proponent has provided no substantial information or data to validate the proposed modifications. Brookfield have previously been advised that the primary reason for the removal of the stop was that the City of Sydney Council were dissatisfied that the gradient along George Street could achieve a flat surface platform to satisfy DDA requirements, without resulting in an 'eyesore', being retaining walls.

In our view, this reasoning is imbalanced and unsatisfactory, as we believe that the location for the light rail stops should be based primarily on the potential catchment of the stop, the demand for public transport accessibility, impact on urban renewal opportunities and the constructability. Previous studies, including the original SSI application advocated for the World Square stop, as "the need to provide convenient access to major trip generators, higher density development and commercial centres was also considered" (Parsons Brinckerhoff, Response to Submissions Report). Equitable access is a fundamental issue within our society, and should always be sought to be attained, regardless of engineering constraints – particularly for government led projects. As such, works required to provide equitable access should not be used as the justification for the removal of public transport, particularly without adequate consideration of potential alternatives.

4.3 EXHIBITION TIME

The proposed modifications to the CSELR project were placed on public exhibition from 3 December until 17 December 2014. Fourteen days notification is an inappropriately short period of time for stakeholders and property owners to fully consider the extent of the changes proposed to one of the most significant infrastructure projects in Sydney. This is particularly compounded given the time of year that this application has come on notification.

Please consider the impact this short notification time has had on stakeholders in the area and their opportunity to provide feedback and comment. This timeframe may have impacted the capacity of others to provide substantial commentary on the issue and to provide assistance in the decision making process. As a key stakeholder in the Sydney CBD, with particular regard to the World Square light rail stop, we request that Brookfield is specifically invited to provide further comment and assistance throughout the assessment process.

5 Conclusion

Brookfield welcomes the CSELR as an important contribution to Sydney's transport infrastructure, and the proposed improvements to George Street for pedestrians. However the removal of the World Square light rail stop is unjustified as the proponent has not adequately addressed the engineering works that would be required to ensure a fully accessible light rail network. Furthermore the projected growth of the precinct, in addition to the already substantial residential and worker population, emphasises the need for more frequent stops in this locality improving accessibility to this precinct, public transport options, and to provide relief at three projected high patronage stops.

Whilst it is acknowledged that the extended LRVs will increase the capacity of both Town Hall and Chinatown stops, it is not considered that this will adequately address the increase in pedestrian movements from World Square to these stations. Further, no data has been released with the application regarding the anticipated patronage of the World Square stop and whether the increased capacity of these stops will accommodate this highly dense precinct.

Fundamentally we reject the premise that the approved light rail stop should be removed exclusively because there are engineering constraints. The original EIS outlined that the

proposed locations of the some 20 stops along the CSELR were assessed against a wide range of criteria, including although not limited to, the potential catchment of the stop, environmental constraints, constructability, stakeholder input, overall and average distance between potential stop locations, existing topography and access arrangements, and potential patronage. As such, the demand for the stop on balance outweighs the requirements for retaining walls and regrading, particularly without an adequate consideration of alternative options.

Brookfield strongly supports the retention of the World Square light rail stop at the approved location, and requests greater consultation and engagement moving forward regarding opportunities to resolve the engineering concerns alluded to in the Modifications Report.

We thank you for the opportunity to comment on the exhibited documentation and look forward to further consultation during the preparation of a Preferred Infrastructure Report to respond to any changes to the detailed design of the World Square, Town Hall, or Chinatown light rail stops.

Should you wish to further discuss this submission, please contact me on 02 9380 9900 or pstrudwick@urbis.com.au.

Yours sincerely,



Peter Strudwick
Director – Urban Planning