

Date: 7/28/2011 6:54 pm
Subject: Casino - MOD 7
Attachments: Signed submission - amended MUEF - MOD 7.pdf; City's submission - Multi-Use Entertainment Facility _MUEF_ - Star City Casino - MP 08_0098 MOD 7.pdf

Dear Megan,

I've had an opportunity to read the DG's EAR (May 2011) and the supplementary report (undated) which were provided in confidence by Kate MacDonald of the Department of Planning.

I'm satisfied that, for the most part, the issues raised in Council's previous submissions have been addressed in those reports.

The City does however maintain its concerns about loading operations associated with the MUEF and its potential impacts on Sydney Buses and surrounding streets. The potential impacts on bus operations also extends to private coaches that use this route. I understand from Kate that the casino has indicated that there is an agreement or the like between them and Sydney Buses but that this has not been provided to the Department (or Council).

I also have some concerns about construction noise management and how potential issues arising from the mass exit of 4,000 people have been addressed.

Loading

The principal issue is the potential impact on Sydney Buses' operations. Comments below are in reference to the use of 19m trucks.

While supplementary information has been provided in relation to loading it doesn't really explain much in the way of how loading operations will actually be managed. For example:

- * How will the loading dock manager ensure that trucks arrive only after a truck has been loaded/unloaded given that only one 19m truck can be accommodated in the nominated area?
- * Where will trucks wait for their OK to arrive at the site? The point being, how will the loading dock manager ensure that trucks aren't waiting in local streets around the site?
- * How likely is it that 'all event trucks would be unloaded or loaded within 3-5 hours'?

In relation to the last dot point, previous information submitted stated that 6-8 trucks would be required, each taking between 30m and 1hr to unload/load (8 hours total). Supplementary information provided still states that 6-8 trucks are required but the time taken to unload/load has been reduced to between 3 and 5 hours. The supplementary information also states that only loading from the back of the trucks is proposed, rather than any side loading. No explanation is provided about how the time estimate has reduced given that side loading would be the quicker and easier way to unload (albeit not possible without impact on Sydney

Buses).

While diagrams show that buses could physically manoeuvre past 19m trucks standing in the nominated location, there is virtually no room for tolerances. The precision demanded of truck drivers to stand in the correct location and for bus drivers to get past doesn't leave much room for error.

Arising from potential manoeuvrability problems, potential congestion and traffic conflicts arise. The concern is twofold:

- * delays with loading activities resulting in loading vehicles being left to stand on the street or circle surrounding streets, which is not acceptable having regard to impacts on the operation of the local street network and amenity impacts to surrounding residents and visitors; and
- * the impacts become such that Sydney Buses seeks to provide an alternative route to avoid potential conflicts. The impacts to bus users would not be acceptable. This area is an important transport hub with a direct connection to light rail.

Under the current timetabling, the last bus is scheduled to go through the casino at 1.15am and the earliest bus arrives at 6.11am. While this leaves a little less than a 5 hour window, an alternative approach to avoid the disruption of bus activities could be to limit loading to within this window. However, this has the potential for significant noise impacts on surrounding residents. While this option may have some merit, it is not considered an appropriate "11th hour" solution as it should be investigated thoroughly and supported with the necessary noise reports to enable a proper assessment of potential impacts.

Construction Noise Management

While I note that the EAR mentions that the proponent's statement of commitments includes the submission of Construction Noise Management Plan, I didn't see this is any of the information sent. I admit I don't really understand proponent's statements of commitment (vs conditions) but I thought they might be contained in the information if it is to form part of the MOD 7 approval. This is a particular concern because the acoustic report predicts non-compliances with noise criteria. The City recommended a condition which also included additional noise mitigation measures which should be investigated (at (G) in the City's original submission, attached).

Management Generally

It's still not clear what consideration has been given to managing the mass exit of up to 4,000 people and associated amenity impacts. It appears that there is no requirement for a specific Plan of Management relating to the MUEF. Reliance on previous plans is considered inadequate given the casino has no facility that holds 4,000 people that will all arrive and depart at around the same time.

Noise Attenuation Measures (Condition B6)

Concern is raised about this condition and (a) the ease of which the

relevant recommendations can be extracted from the report, given that recommendations are contained throughout the 49 page acoustic report referred to and (b) whether the Certifying Authority has the acoustic expertise to ensure this condition is satisfied.

Certification of Noise Mitigation Measures (Condition E1)

Should "or" be replaced with "and"?

I appreciate the invitation to address the PAC and regret that my current workload made that a little difficult at this time. Hopefully these comments are of some use to you. Please call if you need more information.

Regards,

Silvia Correia

Senior Planner

City of Sydney

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