



## **PLAN OF MANAGEMENT NEW ROOFTOP LOUNGE AND BAR**

**161 SUSSEX STREET, SYDNEY**  
**Dated 12 May 2015**  
**Amended 23 November 2016**

This Plan of Management (PoM) has been prepared by GL InvestmentCo, owners of the hotel property at 161 Sussex Street, Sydney in consultation with our operator Four Points by Sheraton (FP). It outlines existing hotel management policies and addresses specific management policies for a proposed new bar and lounge at the property, the subject of a development application to the Department of Planning and Infrastructure.

The bar and lounge are located on the eleventh and twelfth floor of the hotel. The hotel currently comprises the following accommodation:

- Ground floor reception and lounge
- Ground floor restaurant and lobby bar
- 4,000m<sup>2</sup> of convention space including ballrooms, meeting rooms, pre-function space and the like
- 892 hotel rooms
- Back of house and support facilities

The bar and lounge are designed to compliment the existing in house facilities by providing a greater variety of venues to service the significant residential and function guest populations. In particular the lounge will provide a dedicated facility for the hotel's premium guests.

This PoM explains how the premises will be operated to meet obligations associated with the hotel's management policies, liquor licensing requirements, the safety and security of the hotel's patrons and to minimise impacts on our neighbours.

### **OBJECTIVES OF THE POM**

The objectives of the PoM are to assist in the operator's aims to:

- Trade successfully and be recognised as a responsible and responsive member of the local community
- Create an environment that is safe and non-threatening to staff, patrons and other members of the community
- Discourage rapid or excessive consumption of alcohol
- Ensure patrons and guests are served in a responsible, friendly and professional manner by trained staff
- Ensure all employees receive training on their responsibilities and have a sound understanding of management procedures adopted by the operator with the sale and supply of alcohol.
- Minimise the impacts of the operation of the premises on hotel guests and the community and to respond to community concerns promptly and professionally



## **PROPOSED OPERATOR**

The bar and lounge will be operated by the current hotel managers, Four Points by Sheraton Darling Harbour, a member of the Starwood Group

## **IMPLEMENTATION**

The Four Points Hotel Sydney has and will follow the following rules of operation at all times:

- Comply with all regulatory approvals (refer section below);
- Comply with its House Policies (Emergency and Evacuation Procedures, RSA, Cash handling and the like); and
- Ensure compliance with this POM

## **REGULATORY APPROVALS**

FP Hotel Sydney conducts all its on site operations its operations in accordance with:

- the terms of FP Hotel Sydney's development consents
- Liquor licensing requirements

## **FP HOTEL FOOD AND BEVERAGE OPERATION GENERALLY**

FP Hotel Sydney ensure senior management is responsive to the following:

- requirements of the Police Service, in particular the Licensing Section;
- requirements of officers of Sydney City Council, who may visit the premises from time to time in the performance of their statutory duties. They are to be afforded courtesy and issues raised by them are to be addressed in a sensible and prompt manner. Senior management are to be aware that there is amenity and other issues affecting a precinct such as the CBD I Darling Harbour area and that co-operation and responsiveness are important in protecting the amenity of the area.

FP Hotel recognises the need to ensure the safety and security of customers, staff, residents and the greater community in which the hotel resides.

The PoM is consistent with the principles of Crime Prevention Through Environmental Design (CPTED). by creating environmental and social conditions that

- Maximise risk to offenders (increasing the likelihood of detection, challenge and apprehension);
- Maximise the effort required to commit crime (increasing the time, energy and resources required to commit crime);
- Minimise the actual and perceived benefits of crime (removing, minimising or concealing crime attractors and rewards); and
- Minimise excuse-making opportunities (removing condition that encourage/ facilitate rationalisation of inappropriate behaviour).



The safety and security issues addressed in this PoM are consistent with current policies that ensure the quiet amenity of neighbouring properties is maintained at all times during the operation of the premises. All staff, as part of the induction process, are required to be familiar with this PoM.

## **STAFFING**

The facilities proposed in this develop application are largely a re-arrangement of existing facilities and no increases of staff are envisioned, and will vary with function bookings and times of year. Approximately 12 staff will work at the bar and 6 staff at the lounge.

All hotel food and beverage outlet staff employment is managed in the following manner:

### **1. Recruitment policy**

It is the FP hotel's policy to recruit the best person possible for the job, irrespective of colour, race, sex, sexual orientation, pregnancy, physical impairment or marital status and to encourage promotion from within the restaurant.

### **2. Equal employment opportunities**

The FP Hotel fully supports the Federal, State and Local Governments' policy of equal opportunity for all persons. This policy is based on the principles of Equity and Fairness embodied in the government's anti-discrimination legislation. The objectives of this legislation are to eliminate and ensure the absence of discrimination in employment and to actively promote equal employment opportunities for minorities, men, women, and the physically impaired.

### **3. Training policy**

The FP hotel strives to set a high priority on the training and development of its team members, nurturing excellence in everyone. Further, it recognises that it's continued and increased success is dependent upon the provisions of trained motivated team members at all levels and in all positions.

### **4. Appraisals**

Hotel Management appraise staff annually. The purpose of these appraisals is to provide feedback on performance and where appropriate, help improve performance. Knowledge, skills, attitude, quality and output of work, maintenance of RSA policies and procedure, grooming, and attendance are all taken into account. Staff have the opportunity to discuss their progress and career objectives and are also able to make comments on the appraisal document. Written appraisal documents are in no way intended to take the place of daily communication that will occur between staff and the Managers | Chefs. They are meant to formalise and summarise the ongoing informal communication, so there should be no surprises when appraisal time comes around.



## **NOISE IMPACTS**

The new proposed Bar and Lounge area will be managed to minimise the potential of causing a nuisance, or an offensive noise as defined in the *Protection of the Environment Operations Act 1997* to adjoining properties or the public. The following measures will be implemented:

- No entertainment of any form will be provided externally.
- No amplified entertainment provided within the internal areas will be broadcast to the external area.
- FP Hotel will ensure senior management is aware of the operational consequences of the POM to ensure that it is consistently enforced.
- All staff, as part of the induction process, will be required to be familiar with this Management Plan and will play an important part in maintaining a quiet ambience.
- All staff, as part of the induction process, will be fully briefed on how they should address and caution potentially inebriated or unusually vocal customers in order to minimize the likelihood of disturbing the quiet and good order of the neighbourhood. All food and beverage employees are RSA licensed and practice RSA.
- Customers making any noise will be asked to leave quietly and quickly and any customers loitering will be asked to move on.
- Additionally, the safety and security issues addressed in this Management Plan have been devised to ensure the quiet amenity of neighbouring properties is maintained at all times during the operation of the premises.

## **COMPLAINTS MANAGEMENT**

Complaints management in accordance with condition F10 of the consent will be managed utilising the following:

- A publicly advertised direct telephone number, to be answered by the on site manager during operating hours, will be made available for the executive bar and lounge
- A publicised postal address will be made available for receipt of mailed complaints
- An dedicated email address will be made available for receipt and registration of electronic complaints

Wherever possible, appropriate remedial action will be implemented immediately and the licensee or duty manager is to contact the complainant within 24 hours to confirm details of action taken.

A Complaints Register will be established to record all details of all complaints received through the means listed above. The register will be kept up to date recording as a minimum the following:

- The date and time, where relevant, of the complaint
- The means by which the complaint was made (telephone, mail or email)
- Any personal details of the complainant provided



- The nature of the complaint
- Any actions taken by the hotel operator in relation to the complaint, including and follow-up contact; and
- If no action was taken by the hotel operator in relation to the complaint, the reason(s) why no action was taken.

The Complaints Register will be made readily available for inspection by the Department, Council, NSW Police, SHFA and OLGR at all times.

### **WASTE MANAGEMENT**

FP Hotel has appropriate designated internal existing areas for the storage of segregated wet, dry, paper and glass receptacle garbage.

As is currently in place, the Food and Beverage Department Stewarding staff will empty all bins from the Bar and Kitchen areas on a regular basis and will empty them in the garage areas of the hotel's loading dock area which are then removed by a contracted contractor 6 days a week. The same staff will be in charge of maintaining the premises clean and tidy, from the external area, to the internal dining areas, toilets and kitchen I bar.

The Lounge & Bar's Management will ensure that areas surrounding the premises are monitored on a continual basis and will ensure that all fire escapes and stairways are kept clear of objects at all times.

After the completion of each business day, a complete patrol will be conducted of the immediate area surrounding the premises to ensure premises is secure and all rubbish etc. is cleared.

As per Sydney City Council's policy the areas will comply with Council's *Policy for Waste Minimisation in New Developments 2005*, which requires facilities to minimise and manage waste and recycling generated by the proposal.

### **ON-SITE SECURITY**

The security and safety of employees and the general public are highly valued by the management of the premises.

The hotel has high quality CCTV surveillance cameras in the premises in strategic places and includes the bar I cashiers I service areas. This system has automated recording technology, longer video storage capacity and video motion detection.

All cameras operate 24 hours a day. The surveillance tapes I videos are kept for at least 1 month for viewing by the Police if required. The quality of the images filmed satisfies Police requirements.

Management will ensure the system is maintained and in good working order.



Management ensures that the coverage is operated with due regards to the privacy and civil liberties of all persons within the development and in strict accordance with the Privacy and Personal Information Protection Act 1998.

FP Hotel Sydney's employees are encouraged to assist with passive surveillance of all areas of the development and in particular the restaurant, function and bar areas by providing efficient reporting systems for any security or safety concerns during the restaurant's operating hours.

The standard of lighting reduces the fear of crime in accordance with Australian lighting standards and also serves to provide clear identification of activity using the high technology CCTV cameras. Any broken light fixtures and bulbs within the premises are replaced within 24 hours.

The Food and Beverage areas have been designed to take into account the need to maximise clear sight lines. The lounge and bar incorporate the maximum use of natural surveillance and minimise potential obstructions such as physical barriers to ensure these clear sight lines.

FP Hotel undertakes a risk assessment analysis on a continual basis to determine the need for security personnel in the hotel.

FP Hotel employs a full time department of high quality Security Personnel managed by a Security Agency. Security personnel employed by the agency:

- possess a current security license and have satisfactorily completed all relevant training associated with a crowd control license;
- are licensed under the appropriate legislation relating to crowd control;
- conduct themselves in accordance with the industry code of practice;
- maintain a well-kept, tidy and professional appearance and are at all times easily recognisable as "security personnel";
- carry a powerful torch and wireless communication system whilst conducting patrols;
- are fully briefed on the hotel's security protocol;
- are fully briefed on how they should address and caution potentially inebriated or unusually vocal customers in order to minimize the likelihood of disturbing the quiet and good order of the neighbourhood;
- ask customers making any noise to leave quietly and quickly and ask any customers loitering to move on.

In the event that theft occurs involving a customer, every effort will be made to assist the customer in any way possible, i.e. forms, police report, telephone calls. All personal information will be recorded in case any items are recovered at a future time.

Incidents involving staff members must also be documented and any necessary policy reports must be completed. A list of all items missing must be recorded.

The theft of any property from the premises must be reported to the police for



insurance purposes.

The FP Hotel has documented procedures for robbery and armed hold-up. All security personnel and staff are trained in procedures for dealing with armed robbery. These procedures include:

- security procedures;
- responses and actions to follow during a robbery; and
- procedures following a robbery;

The hotel has a Robbery Description Form for recording an accurate description of the suspect.

The FP Hotel has documented procedures for responding to bomb threats. The hotel aims to ensure the maximum safety for guests and staff. All staff working at the FP Hotel are trained in procedures for dealing with a bomb threat.

The General Cashier removes money from cash points and replenishes the hotel ATM periodically as appropriate. Security officers escort staff when cash is being handled. Cash handling is undertaken randomly and routine procedures are avoided. Cash handling is also monitored via the hotel's CCTV system.

## **PATRON AND CROWD MANAGEMENT**

The following are the key principles adopted by the FP Hotel at all of its food and beverage venues to manage individual patrons and crowds:

- FP hotel does not serve liquor to intoxicated patrons. As well, intoxicated patrons are not allowed to remain on the premises, and due to the nature of the area, this is, and will continue to be tightly controlled by hotel management.
- FP Hotel refuses entry to intoxicated persons coming from other venues in order to reduce incidences.
- All staff, as part of the induction process, are fully briefed on how they should address and caution potentially inebriated or unusually vocal customers in order to minimize the likelihood of disturbing the quiet and good order of the neighbourhood.
- Customers making any noise are asked to leave quietly and quickly and any customers loitering are asked to move on.
- Additionally, the safety and security issues addressed in this PoM have been devised to ensure the quiet amenity of neighbouring properties is maintained at all times during the operation of the premises.
- FP Hotel employees are encouraged to assist with passive surveillance of all areas of the development and in particular the external dining area, by providing quick feedback for any behavioural or noise concerns with patrons as they are preparing to leave, and are leaving the premises. Staff will be encouraged call their Supervisor or Manager if any difficulties arise to quickly "intercept" any potentially noisy, rowdy or abusive patrons to attempt to calm them down as much as possible as they leave.
- No persons are to be permitted to queue, drink or loiter outside the



boundaries of the licensed premises. Management / Security ensure that there is no queue for the premises and will take all reasonable steps to ensure compliance with this condition. Note that given the proposed new venues are on level 11 and 12 of the hotel north tower there is no potential for queuing outside the property or license boundaries.

- Anyone loitering outside the boundaries of the area approved by the Liquor Licence will be asked to leave quietly and quickly by Management
- All staff, as part of the induction process, will be fully briefed on how they should address and caution people who may congregate or loiter outside the boundaries of the area approved by the Liquor Licence in order to minimize the likelihood of disturbing the quiet and good order of the neighbourhood
- Should any group of patrons become loud or aggressive, the Manager is trained to deal with the Host directly to insist that the loud or aggressive behaviour stop immediately
- All staff, as part of the induction process, are fully briefed on how they should address and caution potentially inebriated or unusually vocal customers in order to minimize the likelihood of disturbing the quiet and good order of the neighbourhood
- Should any member of a group arrive or become intoxicated during their visit to the hotel's Food and Beverage Outlets, the Manager politely but firmly informs the host that the person or persons involved are not allowed to remain in FP hotel Sydney and must unfortunately leave the premises - quietly. Pressure is put on the host to avoid that any potential negative situation that could arise from such an ejection and the host is encouraged to escort the person or persons from the property out to the street.

## **RSA HOUSE POLICY**

FP Hotel has formulated a RSA House Policy that covers the four main areas of the Responsible Service of Alcohol, being:

- Underage Drinking
- Intoxication
- Violence and Disruptive Behaviour, and
- Drink Driving

RSA training is mandatory by Law within NSW for all liquor licenses and staff who have liquor service responsibilities. A Liquor Administration Board (LAB) certificate will be obtained through accredited NSW Office of Liquor Gaming and Racing course. All staff involved in the sale and/or supply of liquor at the restaurant, MUST have completed an approved Responsible Service of Alcohol course prior to commencing work within the restaurant.

The course is only recognized in New South Wales if it's completed in conjunction with a bridging course. The bridging course aims to bring in line interstate training with the responsible service of alcohol provisions of the NSW state liquor laws.

All staff will carry their RSA cards for viewing by the NSW Police or Department of Gaming and Racing special inspectors.



As under the Liquor Licensing Act the hotel would be liable to penalties for serving minors (under 18 years of age), and as such The FP Hotel Sydney takes all possible steps to avoid jeopardising the licence by refusing service of liquor to minors. Staff are trained that if at all in doubt as to whether or not a given customer is a minor, proof of age must be insisted upon. If proof of age is not provided, in the form of a driver's licence or other official identification, liquor is not served.

Liquor will not be served to intoxicated patrons.

As well, intoxicated patrons must not be on the premises, and due to the nature of the area, this will be tightly controlled by hotel management.

As such, FP Hotel will refuse entry to intoxicated persons coming from other venues in order to reduce incidences such as those listed above. Staff are encouraged to call their Supervisor or Manager if any difficulties arise.

FP Hotel adopts the use of a Harm Minimization Plan of Management (HMPOM) to be used in conjunction with this POM and its security management plan in order to reduce the risk of excessive consumption or abuse of liquor.

FP Hotel is in alliance with the Liquor Industry Code of Practice for the Responsible Promotion of Alcohol Products. A copy of the Code is displayed clearly in all venues and made readily available to all members of staff involved in the sale and/or supply of alcohol.

FP Hotel does not promote activities that can lead to excessive consumption or abuse of liquor.

All signage required by law will be displayed prominently throughout the premises and at the point of entry.

In accordance with current legislation, management will encourage patrons to drink responsibly.

Low alcohol beer and non-alcoholic beverages will be available at all times when full strength liquor is available.

In addition, food is made available wherever liquor is served.

All conditions of the Liquor License will be complied with.

A file note of all RSA issues and incidents is kept by management in an RSA logbook. This logbook serves to keep the owners and senior management both aware of all incidents as well as to be able to ascertain ongoing training deficiencies and re-training needs.



## EXISTING OPERATING HOURS

Extract from current liquor license:

*Consumption on premises - Area: The Lobby Bar, The Dundee Arms Tavern, Ground Floor Ballroom, Pre-Function Area, Level 11 - Nikko Lounge & adjoining Outdoor Area (Roof Garden).*

Day	Start Time	End Time
Monday	05.00am	05.00am
Tuesday	05.00am	05.00am
Wednesday	05.00am	05.00am
Thursday	05.00am	05.00am
Friday	05.00am	05.00am
Saturday	05.00am	05.00am
Sunday	05.00am	05.00am

The level 11 lounge sits within the current liquor license boundaries (being the Nikko lounge and adjoining outdoor area). The lounge will be managed in accordance with the following Office of Liquor, Gaming and Racing's documents in relation to liquor operations.

- License Checklist (March 2012)
- Statutory license conditions and requirements

The level 12 bar sits outside the liquor license boundary at the time of consent and is the subject of an extended liquor license boundary application expected to be approved in November 2016

## APPROVED OPERATING HOURS

The level 12 rooftop bar will operate in accordance with Condition A6 of the approval which provides for 24 hour, 7 days per week operation for the first 12 months after which time a modification to the approval will be required to maintain operation between midnight and 7am.

There are no approval constraints to operating hours for the level 11 lounge.

## PUBLIC TRANSPORT

FP Hotel website map shows the close proximity of the Town Hall, Darling Harbour and Wynyard stations - the area's huge transport hubs for visitors who may wish to visit using public transport.

## CLEANING AND GENERAL SERVICING

The FP Hotel's housekeeping and stewarding staff are responsible for maintaining all of the premises in a clean and tidy state.

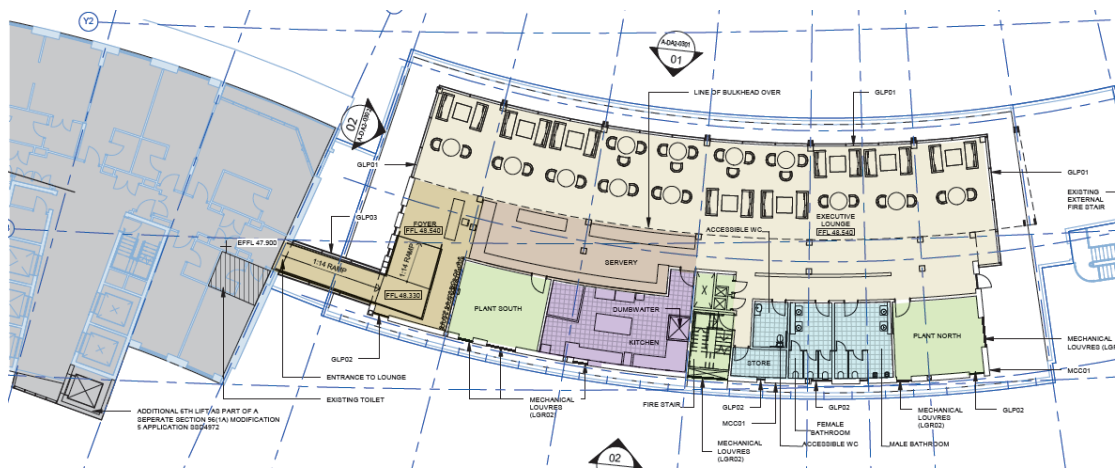
The FP Hotel's Management ensure that areas surrounding the premises are monitored on a continual basis and that all fire escapes and stairways are kept clear of obstructions at all times.

At the completion of each business day, a complete patrol is conducted of the immediate area surrounding the premises to ensure premises is secure and all rubbish etc. is cleared.

## LEVEL 11 LOUNGE

### General Description

The level 11 lounge is a fully enclosed facility located on the footprint of the existing licensed Level 11 rooftop bar operation. The maximum capacity of the lounge is 200 persons and it is designed to service the hotel's premium guests with limited food and beverage service including buffet breakfast, tea, coffee, evening snacks and alcoholic beverages.



Level 11 lounge floor plan

### Access and Security

Guest access to level 11 will be via the secure front of house lift bank with access to level 11 only available to hotel or function guests using their key card to activate level 11 in the lift security. Access to the lounge will be via a staffed host desk located immediately adjacent to the entry doors during peak periods and via key card access to authorised guests at other times.

Guest toilets are provided within the lounge area.

As with all areas of the hotel where alcohol is served, CCTV monitoring will be provided to all front of house areas and to the entry/exit points of rooms where alcohol is stored. All such alcohol storage rooms will have restricted and secure access.

### Operation

The lounge will operate in a similar fashion to other premium hotel and airline lounges with key card access provided to authorized hotel guests. The area will be staffed at all times when accessible by guests. As noted previously there will be 6 hotel staff within the lounge.

Food and beverage service will be available as detailed below:





Access to the level 12 bar for guests and visitors will be via the front of house lifts with lift access at the ground floor behind reception and guests access from each hotel room floor. The bar is located approximately 25 metres north of the guest lifts along the guest corridor at level 12.

Guest toilets are provided within the bar area.

As with all areas of the hotel where alcohol is served, CCTV monitoring will be provided to all front of house areas and to the entry/exit points of rooms where alcohol is stored. All such alcohol storage rooms will have restricted and secure access.

A duress alarm is provided at all cash points

The hotel employs full time security staff and security representatives will be on duty at the bar during peak times. Management and security will fully co-operate with Police at all times providing written statements in respect of any incident when requested by Police and maintaining an OLGR approved incident register at all times – noting time, date and nature of all incidents on or adjacent to the premises, who were involved, and the response or the management of the situation.

Management and security will actively monitor patrons behaviour and, at regular intervals. This includes regular walk throughs of all areas of the premises to assess any potential problems. This includes patrons who may have become affected by the consumption of alcohol. Upon identifying any such patrons, management will take appropriate action in accordance with RSA (Responsible Service of Alcohol) requirements.

If a staff member asks a patron to leave, the request will be made under Section 77 of the Liquor Act 2007, and the staff member will state their name and title. The staff member will provide an explanation as to why the patron has been requested to leave, when possible.

Management and security/RSA personnel will conduct regular checks of all emergency exits including fire exit doors, stairwells, and main entrance and exit points to ensure areas are kept clear of any obstructions. Personnel are instructed to ensure easy egress can be made through the designated areas to safety should the need arise.

### **Operations**

The proposed bar will operate in a similar manner to the existing Bar 11 (on level 11 of the hotel) with full time qualified staff on duty providing bar services to guests at all times the bar is open. An extension will be sought from the NSW Office of Liquor, Gaming and Racing to the existing hotel liquor license and Minor's Area Authorisation boundary to include the bar within the hotels existing liquor license area. It is proposed that the current operating hours would be maintained for the relocated bar as outlined in the table provided above.

The bar will operate generally from 10am until 3am. Food and beverage service will be available as detailed below:

- Food service will be available from the bar kitchen on level 12
- A full bar service will be available to patrons at the bar and via waiter service to seating areas.



As noted previously there will be up to 12 staff on duty depending on guest numbers.

The bar will be managed in accordance with the following Office of Liquor, Gaming and Racing's documents in relation to liquor operations.

- License Checklist (March 2012)
- Statutory license conditions and requirements

We confirm there is no gambling proposed in this or at any other location in the existing licensed premises of the hotel.

### **Noise Control**

The bar operation will be closely managed to minimize noise impacts on existing hotel operations, in particular the adjacent balcony suites in the north tower. It is imperative that the viability of the adjacent rooms is not compromised. This will necessarily limit the amplification level of background music played in the area. For this reason it is also not proposed to have live music or DJ's operating in the rooftop bar.