

CBD and South East Light Rail Project, Modifications Report Submission

Prepared for Amalgamated Holdings Limited

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CBD and South East Light Rail Project, Modifications Report Submission

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1.0 Introduction

Amalgamated Holdings Limited (AHL) commissioned High Range Analytics Pty Ltd (HRA) to prepare a submission on their behalf to the *CBD and South East Light Rail (CSELR) Project – Modifications Report* ('Modifications Report', dated December 2014).

AHL has a direct ownership interest in a number of properties along the southern frontage of Market Street between Pitt Street and George Street, and along the eastern frontage of George Street between Market Street and Park Street. These buildings include the iconic State Theatre and the Gowings Building, a landmark for decades, on the corner of George and Market Streets. This submission describes these properties collectively and the immediate surrounds as the 'Precinct'.

Positive Traffic, on behalf of AHL, made a submission to the CSELR's Environmental Impact Statement (EIS) during the exhibition period in December 2013. That submission identified the specific service vehicle access requirements for these properties and raised their concerns with elements of the project. For completeness, that submission is attached to this report at Appendix A.

The key motivation for this submission is to highlight the long standing existing need for service vehicles to be able to access the eastern side of George Street south of Market Street; and to reinforce the need for the design changes proposed by the CSELR Modifications Report – specifically the longer platforms at the Queen Victoria Building Stop – to ensure that this service vehicle access is facilitated. At present it appears, based on the information in the Modifications Report, that the proposed longer platform at this light rail stop will block access to this loading dock.

This report is structured as follows:

- Chapter 2 describes existing activity and servicing in the Precinct
- Chapter 3 describes and analyses the proposed changes in the vicinity of the Precinct and their impact
- Chapter 4 concludes the analysis presented in this report
- Appendix A contains the submission to the CSELR EIS in 2013 by Positive Traffic on behalf of AHL.

2.0 Existing Situation

2.1 Existing activities

AHL has a direct ownership interest in:

- State Theatre
- QT Hotel (located in the State Theatre and Gowings Building)
- Topshop (former Gowings Building)
- 474-478 George Street

The properties are located around the south east corner of the intersection of George Street and Market Street, in the vicinity of the Queen Victoria Building, and are shown on the following figure. Collectively, these properties and the surrounding area are described as the 'Precinct' in this report.

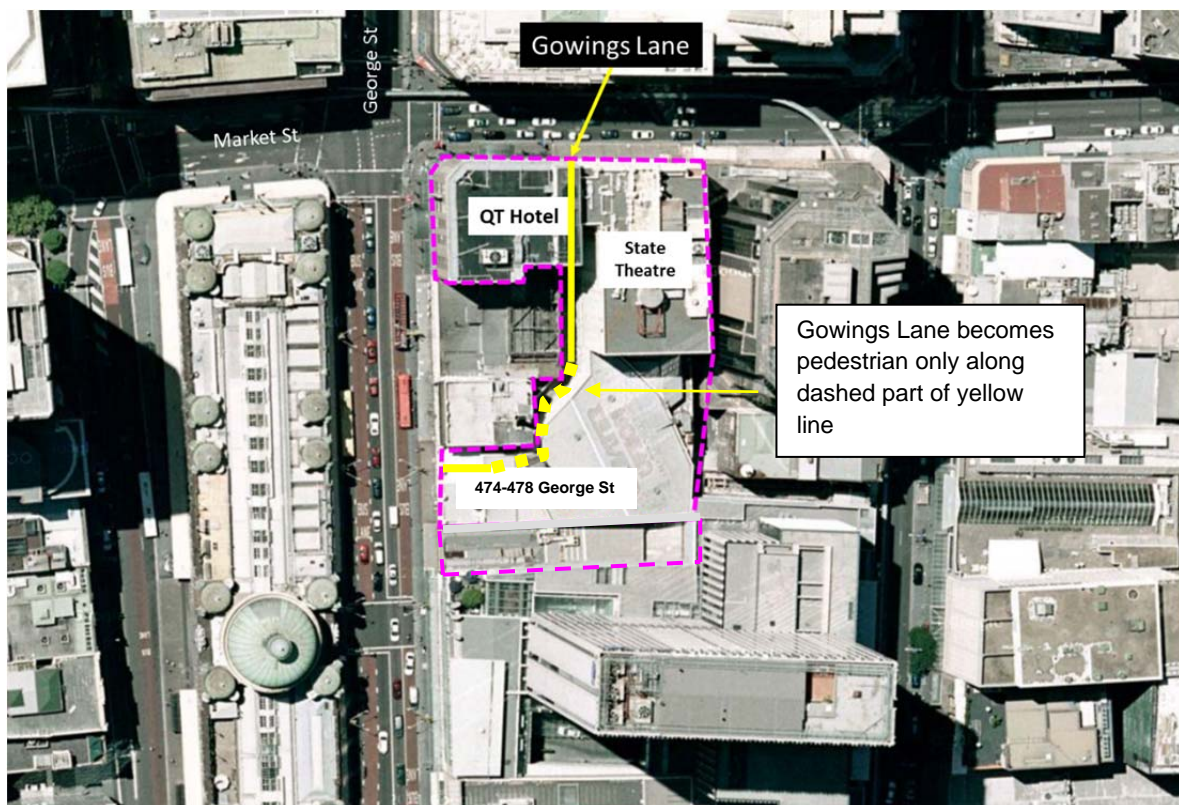


Figure 1 - Existing activities in which AHL has a direct interest

At the time of preparing this submission, the redevelopment of 474-478 George Street was under construction. This redevelopment will expand the State Theatre and provide a commercial office tower. It will have a total floorspace of approximately 6,700sqm and is targeted for completion in October 2015.

2.2 Existing access arrangements

This section describes the existing access arrangements for each of these buildings.

2.2.1 State Theatre

Pedestrian access to the State Theatre is via Market Street, which includes a 'No Parking' zone across the Market Street frontage of the site. The theatre has two loading docks, which provide servicing and delivery of goods for both general operations and major events.

The State Theatre shares a loading dock with QT Hotel and Top Shop retail from Gowings Lane, and has access to a second loading dock from George Street. This dock can accommodate a small rigid truck, as well as being used for kerb side loading/unloading by larger vehicles.

Loading and servicing from Gowings Lane (i.e., access from Market Street) operates 24 hours per day seven days per week. The loading dock in George Street has two distinct operating modes:

- 24 hours per day seven days a week for a small rigid truck (off-street loading/servicing).
- 11:00pm to 5:00am at least one day per week for 19.0m articulated vehicle (semi-trailer) for bump-in-bump-out access from George Street. This is associated with changes of production/performance at the State Theatre, where a large amount of equipment must be moved in/out of the building in a short time and involves a semi-trailer parked parallel to the kerb in George Street adjacent to the loading dock.

Pedestrian and vehicle access arrangements for the State Theatre are shown on Figure 2.

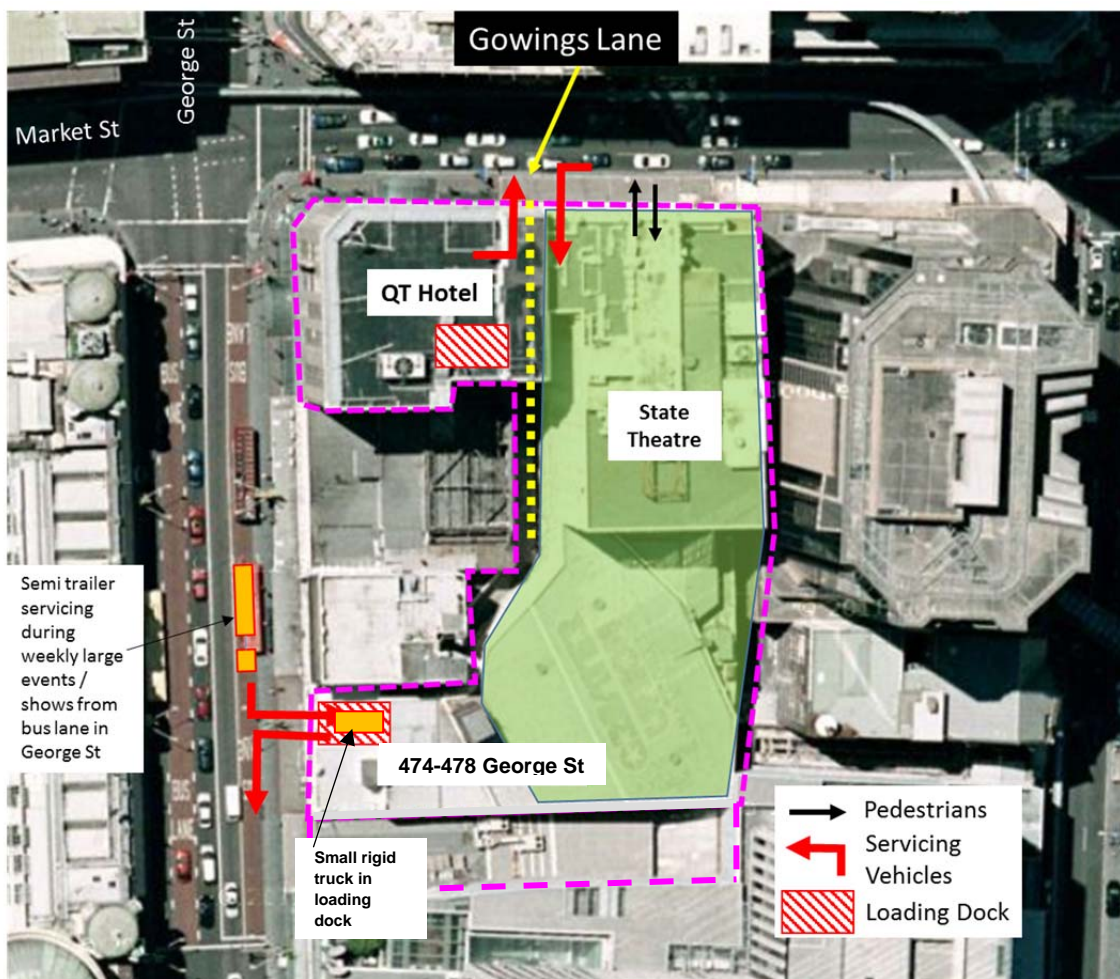


Figure 2 – State Theatre pedestrian and service vehicle access arrangements

2.2.2 QT Hotel Sydney

The QT Hotel is located within the Gowings Building and State Theatre Building, with the front door located in Market Street, under the State Theatre’s awning.

For patron drop-off and pick-up, the QT Hotel relies on the existing 'No Parking' zone in Market Street, which also serves the State Theatre.

Servicing of the property is undertaken via Gowings Lane off Market Street. The existing loading dock is in operation 24 hours per day seven days per week and can accommodate vehicles up to a small rigid truck (6.4m long). The existing loading dock has been designed and is operated to allow a service vehicle to enter and exit Gowings Lane from/to Market Street in the forward direction.

These arrangements are shown on Figure 3.

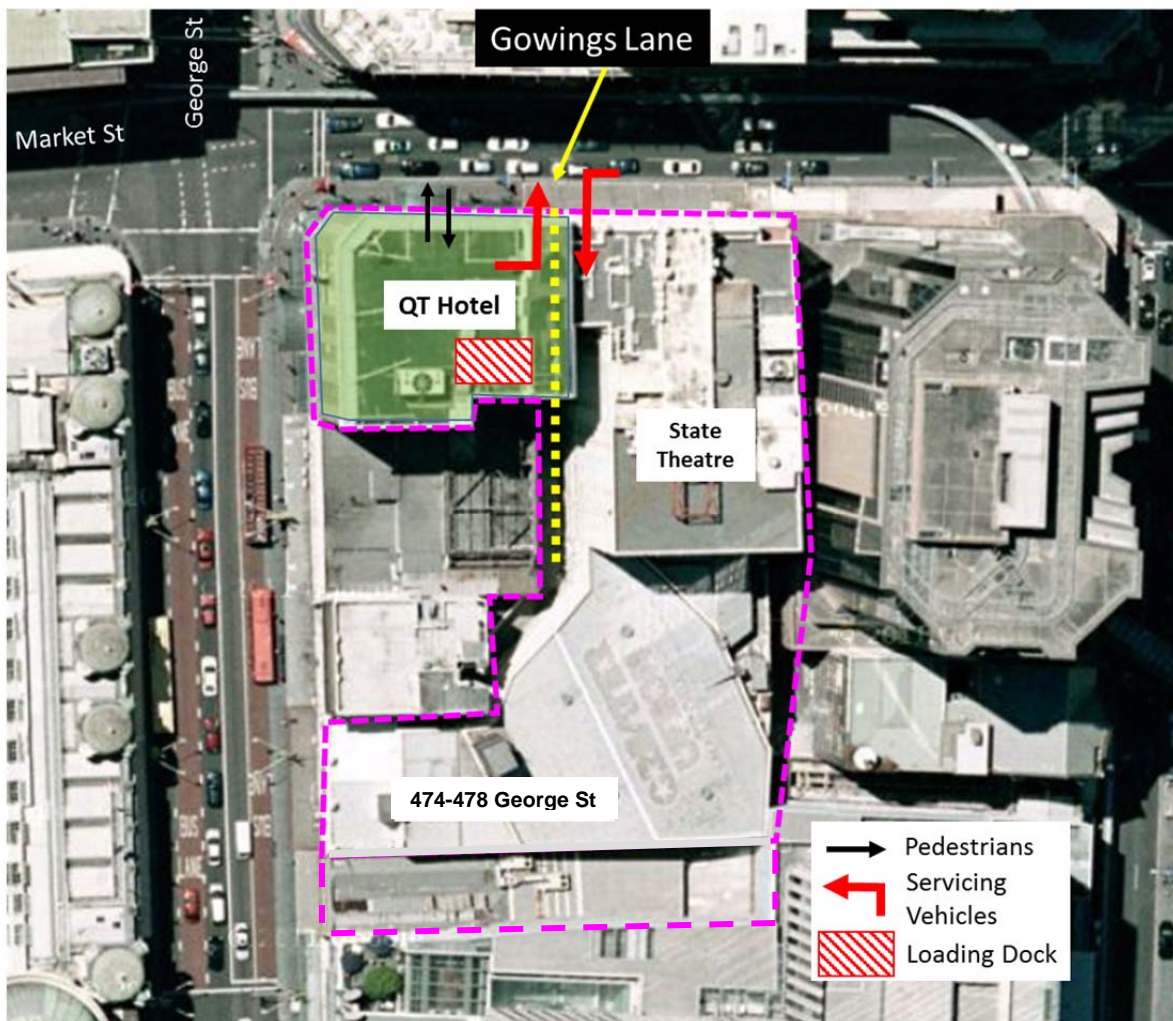


Figure 3 - QT Hotel pedestrian and service vehicle access arrangements

2.2.3 Top Shop

Top Shop is an international high street clothing store located on four floors of the Gowings Building on the corner of George Street and Market Street. It is accessed by shoppers and staff from the Market Street and George Street footways, and uses the loading facility in Gowings Lane for deliveries and servicing. As noted previously, this facility operates 24-hours a day, seven days a week, and can accommodate vehicles up to a small rigid truck (6.4m long), with access and egress from the site in the forward direction.

Figure 4 shows these arrangements.

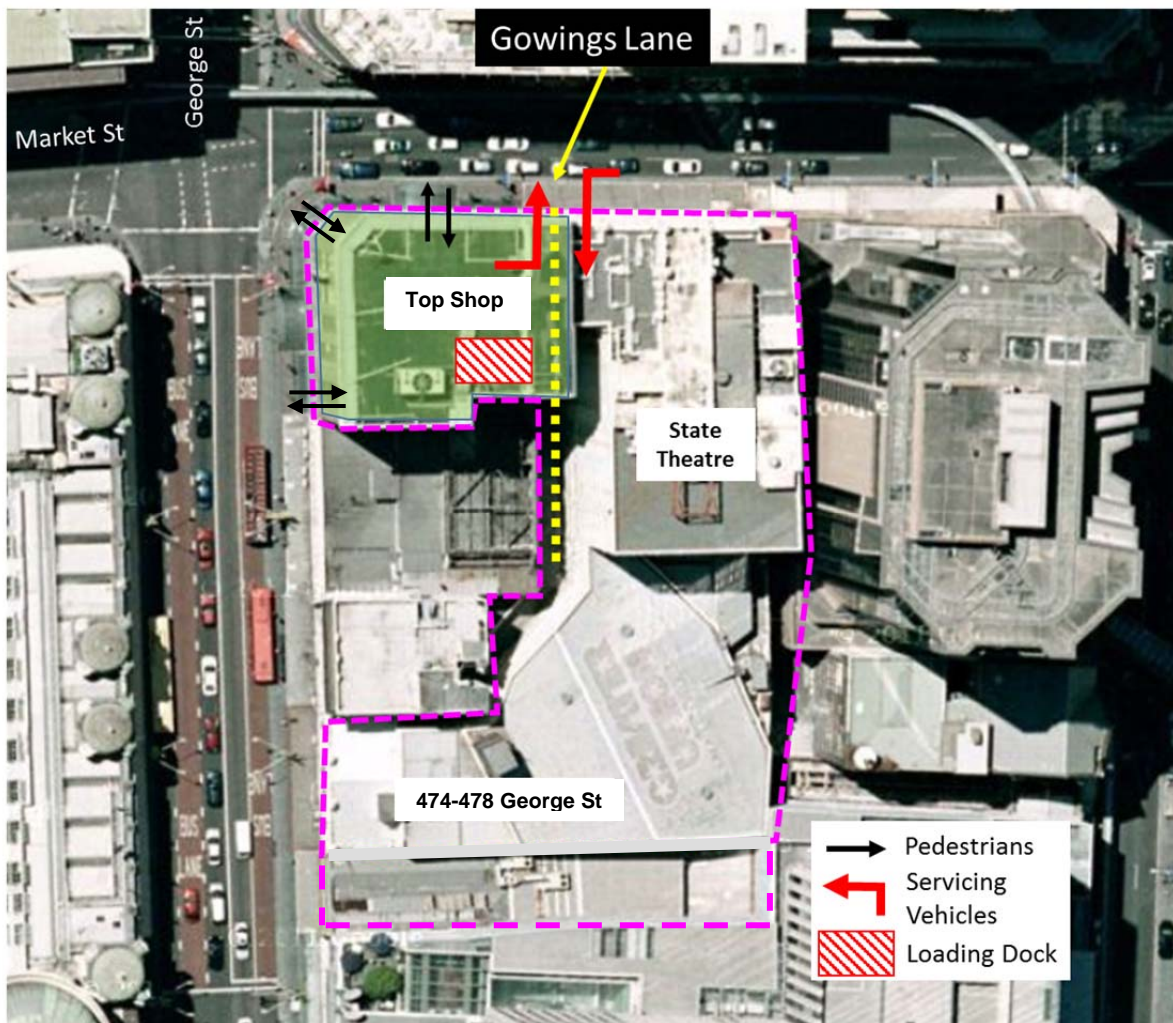


Figure 4 - Top Shop pedestrian and service vehicle access arrangements

2.2.4 474-478 George Street

This development, currently under construction, includes expansion of the rear stage area of the State Theatre and construction of a mixed use retail / commercial tower with frontage to George Street. The existing George Street loading dock, discussed above in Section 2.2.1, will be maintained as it provides rear stage access for the State Theatre.

Pedestrian access will be via George Street. Servicing of the development, including the future retail function would be via the existing loading dock in Gowings Lane which services the QT Hotel, the State Theatre and Topshop.

The ultimate pedestrian/vehicle servicing arrangements for the development of 474-478 George Street are shown on Figure 5.

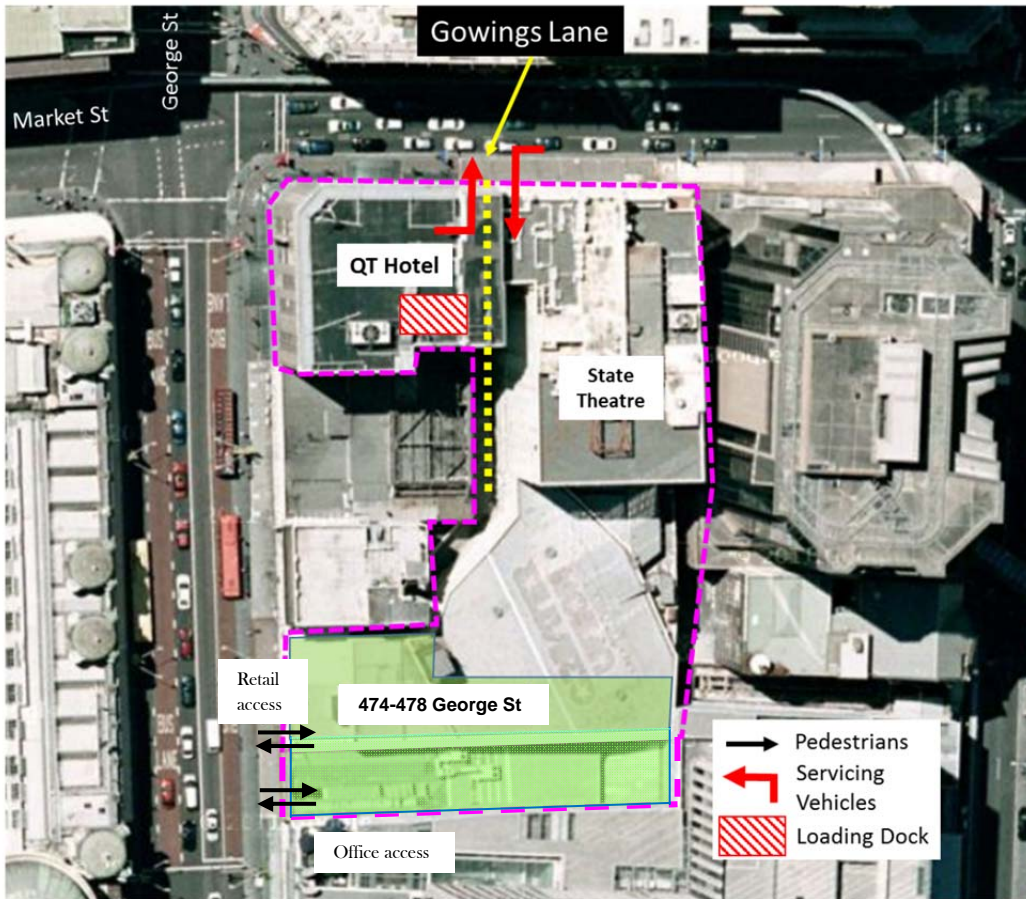


Figure 5 - 474-478 George Street pedestrian and service vehicle access arrangements

3.0 Modifications Report

3.1 Light rail vehicle length and stop length

Section 3.6 of the CSELR Modifications Report describes the proposed modification to the approved design regarding the size of the light rail vehicles (LRV). It is proposed to increase the size of the LRVs from:

- approximately 45m in length with a capacity of approximately 300 people (Approved project)¹

to:

- approximately 67m in length with a capacity of approximately 466 people (Proposal)². This is about a 50% increase in length of the LRVs.

Associated with this change in LRV size, the Modifications Report indicates that stop lengths would be increased, and:

‘...would align with the proposed 67m LRVs.’³

It further states that:

‘Each of the increases to approved stop lengths would be accommodated within the approved project footprint and would retain the general design of the approved stops (i.e., island stop, side platform, etc;)’⁴

3.2 Maintaining service vehicle access

As described in Chapter 2 of this submission, there is an existing requirement to maintain access to several properties along the east side of George Street between Market Street and Park Street, adjacent to the Queen Victoria Building CSELR Stop. The following figure shows these specific requirements – it is a marked-up version of Figure 2 above.

¹ Pg 24 of Modifications Report

² Pg 25 of Modifications Report

³ Pg 25 of Modifications Report

⁴ Pg 25 of Modifications Report

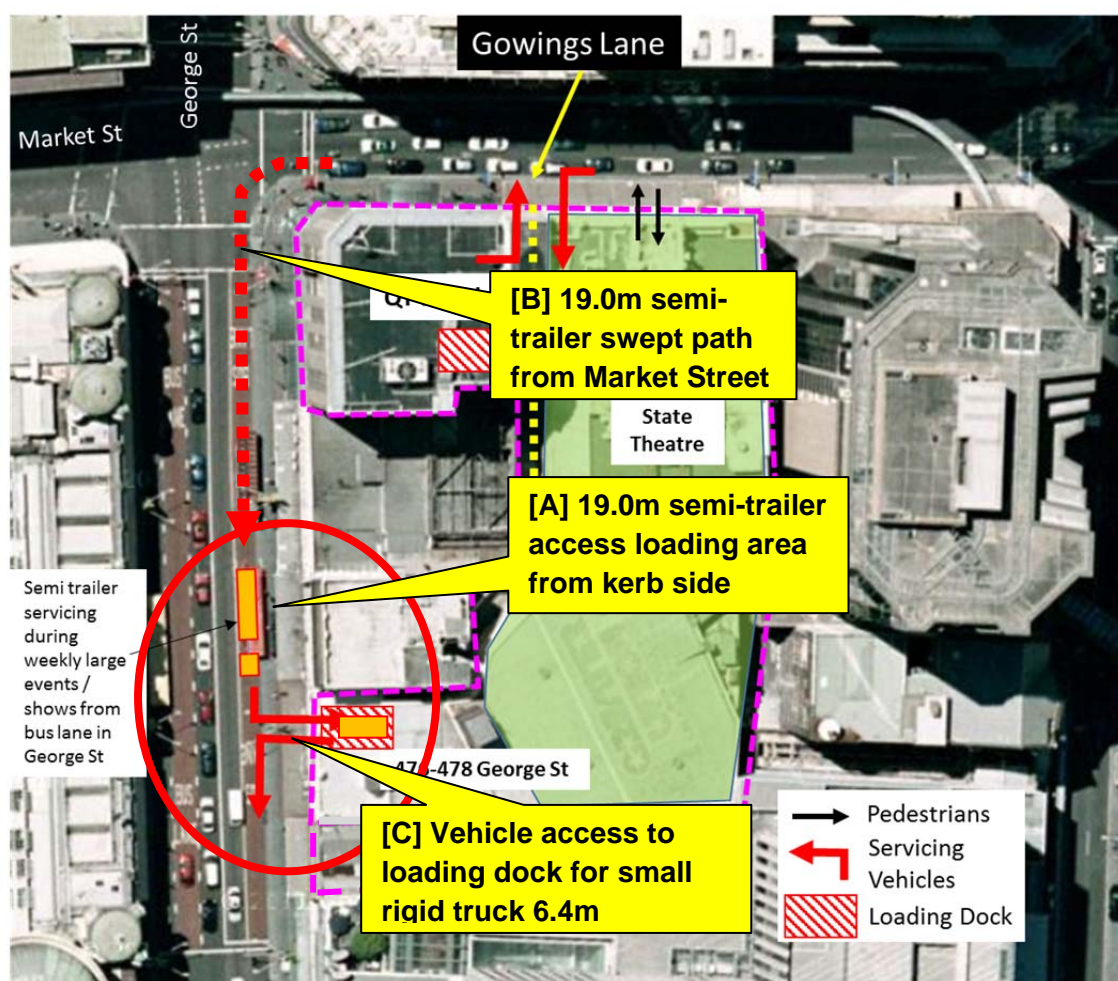


Figure 5 - George Street loading dock for State Theatre and 474-478 George Street, mark-ups highlighting access requirements

The above Figure 5 highlights:

1. The need to maintain access for a 19.0m semi-trailer to the location outside 474-478 George Street to serve State Theatre [A], including its swept path for a left turn from Market Street east to George Street south [B]
2. Ensure that the swept path of a 6.4m small rigid truck to reverse into the George Street loading dock is maintained [C].

For clarity, the above requirements shown on Figure 5 are repeated on Figure 6 below, which is a marked-up extract of Figure 5.12 taken from the 2013 CSEL R EIS (page 5-25 of the CSEL R EIS). As there is not a comparable figure available in the Modification Report showing the proposed longer platform at this stop, we have used the EIS figure and amended it. We have roughly sketched in an indicative location of the southward platform extension that is proposed (blue rectangle with dashed black line border) - its extent is based on a 50% increase in LRV length translating into a 50% increase in platform length. The extension is to the south as, on the information available to us, it is considered unlikely that a northward extension would be possible given proximity of the light rail platform to Market Street. This assumption of ours may not in fact be completely correct, there may be the ability to extend the platform some way to the north (as well as to the south), thereby reducing the potential impact on the George Street loading dock for the State Theatre and 474-478 George Street. We do not

have information regarding the necessary clearance distance required from the Market Street intersection to the northern end of the platform.

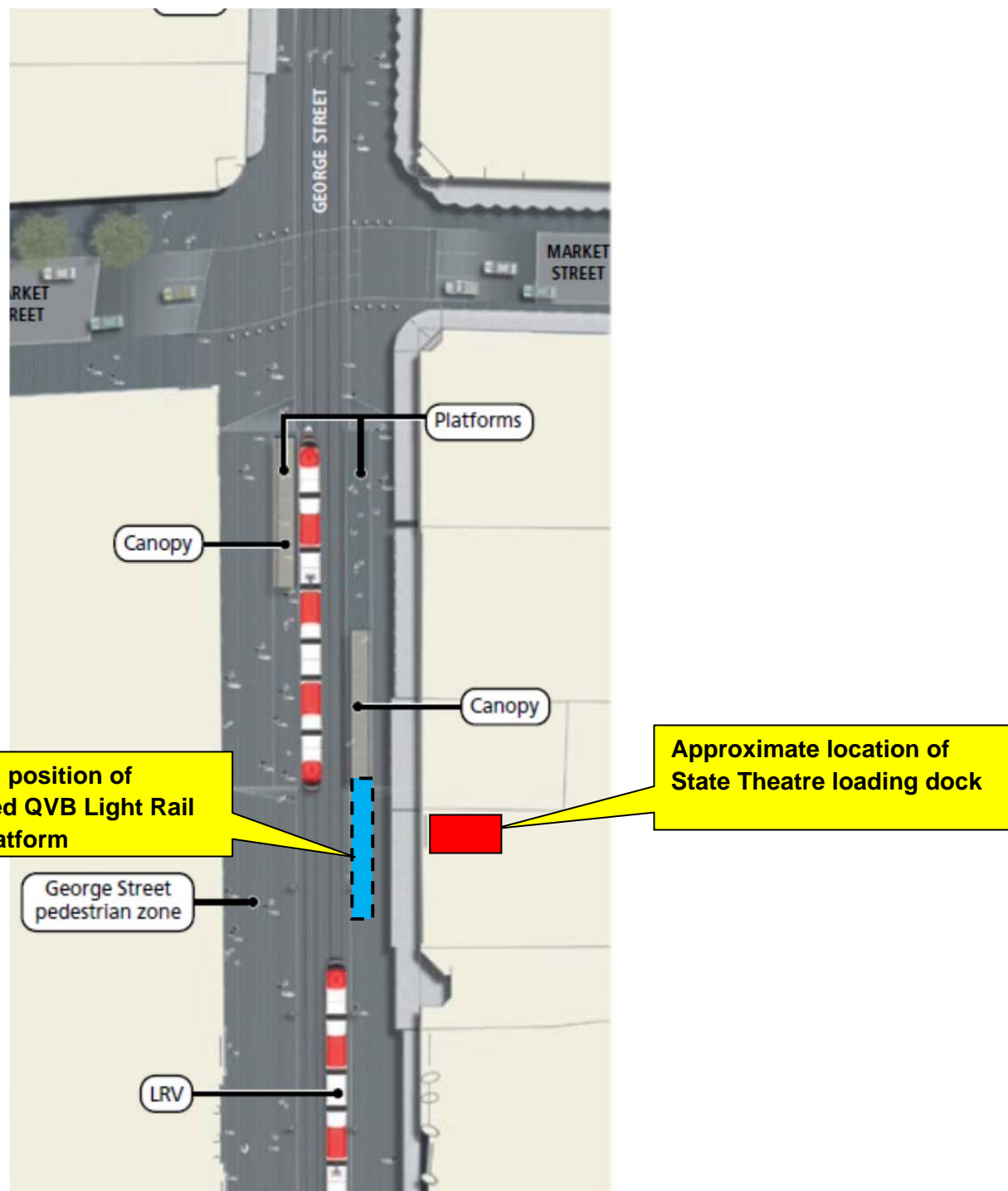


Figure 6 - Relationship of existing State Theatre loading dock on George Street and proposed extended light rail platform, eastside of light rail alignment (source of base is Figure 5.12 from CSELR EIS, 2013, mark-ups by HRA)

The above figure indicates that the extended light rail platform, as described in the Modification Report and inferred by us, will cause substantial interference to the operation of the State Theatre's George

Street loading dock, both for access by 19.0m articulated vehicles (semi-trailers) and 6.4m small rigid trucks.

This is of great concern and needs to be clarified and re-considered as a matter of urgency. To this end we would seek to meet with TfNSW and the scheme designers to discuss the location of the proposed extended platform and in order to provide some precision around this dialogue, we request that:

- a swept path analysis for a 6.4m small rigid vehicle accessing this dock be shown on a scaled drawing
- a swept path analysis for a 19.0m articulated vehicle accessing the kerbside adjacent to the dock also be shown on a scaled drawing.

3.3 Pedestrian conditions

The lower service frequency associated with the proposed use of larger LRVs:

‘...would also increase the number of passengers boarding and alighting each service.’

The Modification Report notes that the commensurate increase in length of the stops’ platforms would provide additional storage capacity for passenger waiting to board a service. It will also result in larger volumes of alighting passengers from each service.

There is concern that, given existing pedestrian crowding on the footways in the Precinct, the proposed larger vehicles have the potential to increase this crowdedness over and above that of the approved project. Crowding at signal controlled pedestrian crossing facilities is currently substantial and impedes the passage of other pedestrians not intending to cross. This would result in impacts, ranging from reduced pedestrian amenity, through to potential safety issues, as pedestrians endeavour to walk along narrow footways, with moving traffic in adjoining lanes, especially on Market Street.

The Modification Report (pg 31) indicates that:

‘Further detailed pedestrian modelling would be undertaken during detailed design to confirm that pedestrian amenity and safety is appropriately catered for at the stops and immediate surrounds (platform access routes).’

We strongly support this undertaking, and request that the analysis is extended into Market Street east of George Street, with a view to establishing the impact of this project change on pedestrian amenity and safety.

4.0 Conclusions

The analysis undertaken in this report has considered the potential impact of the proposed longer LRVs and associated Queen Victoria Light Rail Stop and platform and it concludes that:

- existing service vehicle requirements in George Street (at 474-478 George Street) to support the State Theatre and 474-478 George Street are likely to be substantially blocked by the proposed southward extension of the light rail platform, and based on the information we can extract from the Modifications Report, it seems to us that this access function not be possible. This needs urgent clarification.
- the proposed larger LRV sizes will have implications for pedestrian amenity and safety as a result of larger pulses of pedestrians moving on the footways around the Precinct. The Modifications report undertakes to conduct additional modelling of pedestrians to assess the impact of this proposed effect on pedestrian amenity and safety. We strongly support this and request that this additional analysis includes Market Street east of George Street.

We request further dialogue with TfNSW regarding solutions to the apparent issues with access to the State Theatre's George Street loading dock (refer to Section 3.2 of this report).

Appendix A – AHL’s Submission to CSELR EIS (December 2013)

QT Hotel, State Theatre CSELR Submission

Prepared for: Amalgamated Holdings Limited / Greater Union Organisation Pty Ltd

December 2013

Report No: PT13024r01

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1. Introduction

This submission on the proposed CBD and South East Light Rail (CSELR) project has been prepared on behalf of Amalgamated Holdings Limited (AHL) and the Greater Union Organisation Pty Ltd (GUO) to provide Transport for NSW with an itemised list of matters for inclusion in the design and implementation of the CSELR. GUO is the owner of the land and the buildings comprising the QT Hotel Sydney, the State Theatre and new commercial office development at 476/478 George Street, Sydney. GUO is a wholly owned subsidiary of AHL.

The remainder of the report is set out as follows:

- Chapter 2 describes the existing traffic, access and parking situation for the QT Hotel, the State Theatre and 476/478 George Street;
- Chapter 3 presents a summary of the CSELR project in the vicinity of AHL and GUO land holdings;
- Chapter 4 details the potential issues with the implementation of the CSELR project on AHL and GUO land holdings;
- Chapter 5 provides recommendations for inclusion in final design of the CSELR.

2. Existing Situation

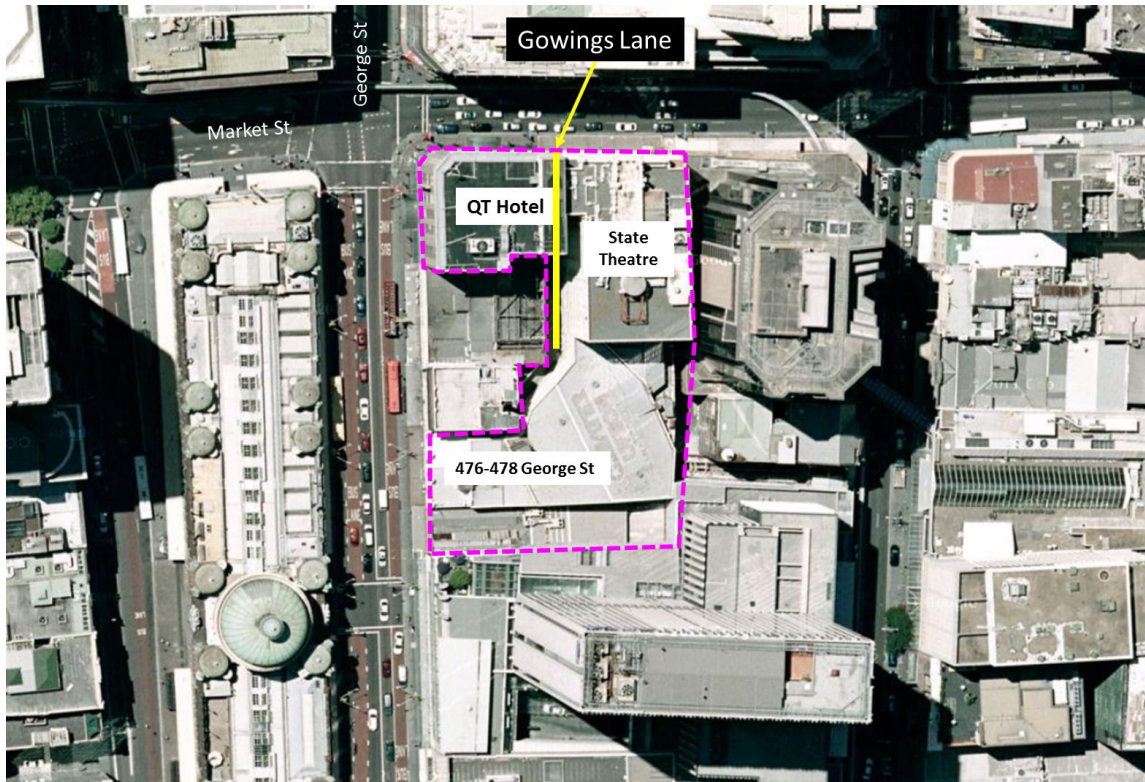
2.1 Existing Developments

The following properties are under control of GUO

- QT Hotel (formally Gowings Building)
- The State Theatre
- 476 – 487 George Street

The properties including frontages to both Market Street and George Street and are shown in **Figure 1**.

Figure 1 – Existing Developments



© Google Maps

At the time of preparing this submission, the redevelopment of 476-478 George Street was under construction. This redevelopment will expand the State Theatre and provide a commercial office tower. The redevelopment will have a total floorspace of some 6,700m² and has a targeted completion date of October 2015.

A summary of each development on matters relating to access, servicing and general traffic arrangement is provided below:

2.1.1 QT Hotel Sydney

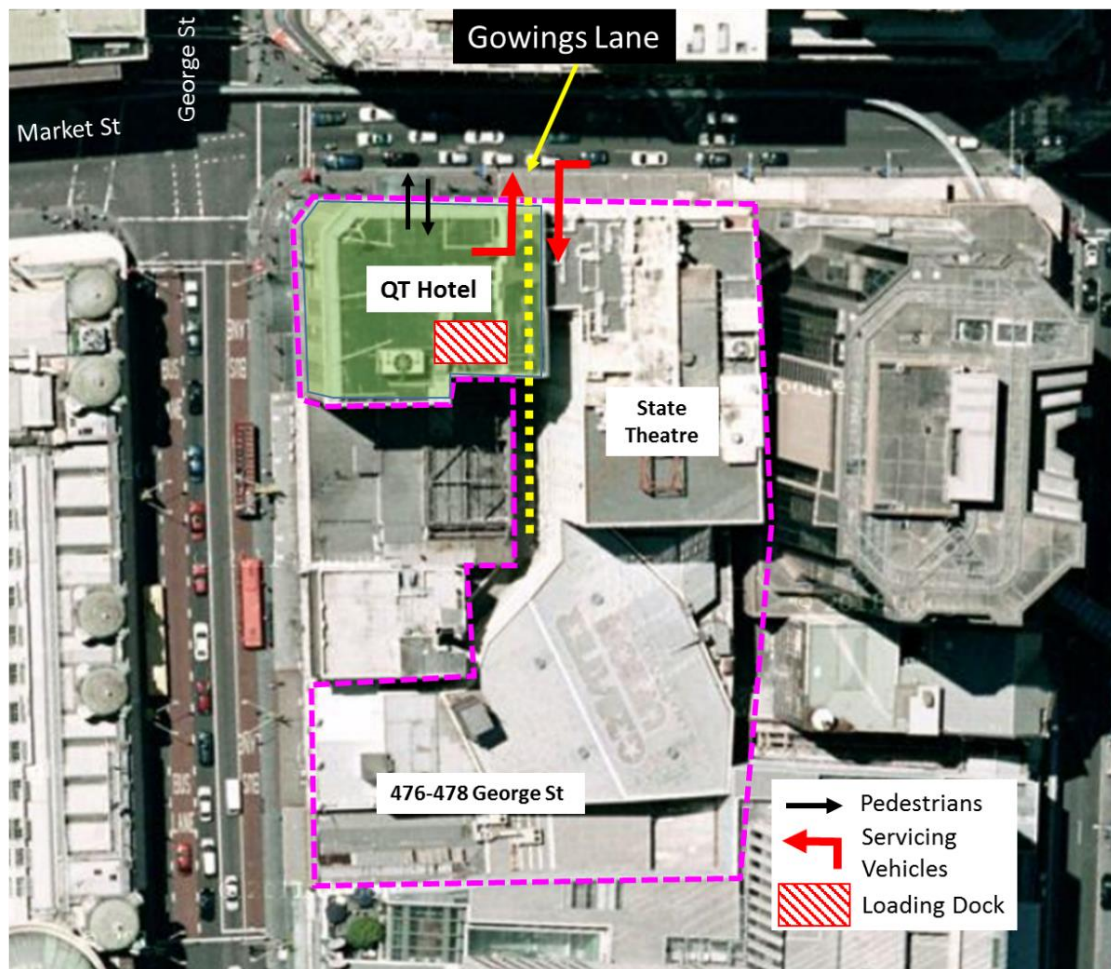
The QT Hotel is located on the south – eastern corner of the intersection of George Street / Market Street, Sydney. It is located in the building formerly known as the Gowings Building. Front door access is via Market Street.

Servicing of the property is undertaken via Gowings Lane off Market Street. The existing loading dock is in operation 24 hours per day seven (7) days a week and can accommodate up to a Small Rigid Truck (6.4m long). The existing loading dock has been designed to allow a service vehicle to enter and exit Gowings Lane in a forward direction. This dock also provides delivery access for top shop retail.

For patron drop off and pick up, the QT hotel relies on the existing No Parking zone in Market Street which services the State Theatre. Further information on parking arrangements on the surrounding road network is provided in **Section 3** of this report.

The existing pedestrian and vehicular arrangements for the QT Hotel are shown in **Figure 2**.

Figure 2 – QT Hotel Pedestrian / Service Vehicle Access Arrangements



2.1.2 The State Theatre

Pedestrian access to the State Theatre is via Market Street which includes a No Parking zone across the Market Street frontage of the site. The theatre has two loading docks which provide servicing and delivery of goods for both general operations and major events.

The theatre shares the loading dock which provides servicing to the QT Hotel and top shop retail from Gowings Lane. Further, the theatre has access to a second loading dock from George Street. This dock can accommodate a small rigid truck. As stated above these docks operate 24 hours per day seven (7) days a week.

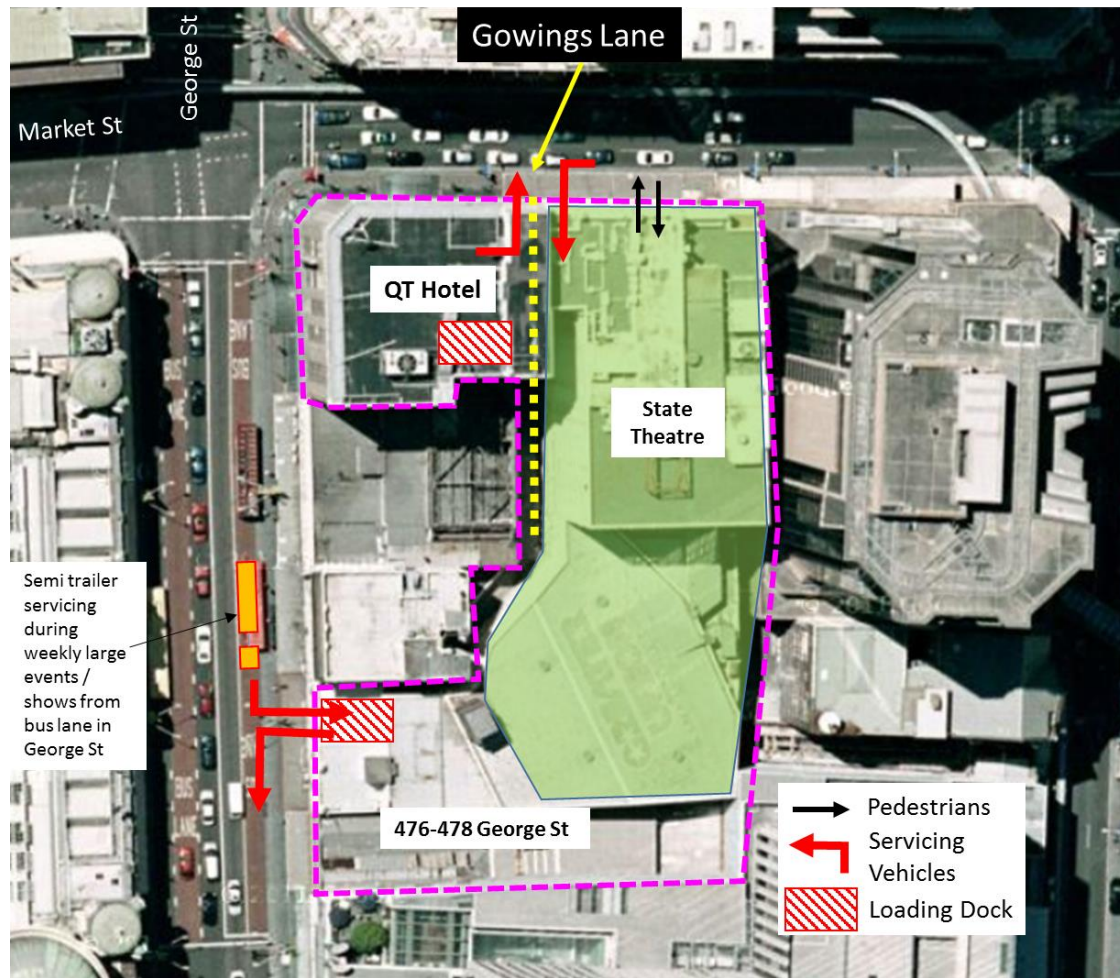
However, during larger events / shows (which occur generally once a week or more), servicing is undertaken by a 19.0m semi-trailer between the hours of 11:00pm – 5:00am with the truck parked in the existing bus lane in George Street. Servicing from George Street is undertaken during these times when the bus services are not operating in George Street. As with the loading dock in Gowings Lane, this dock on George Street operates 24 hours per day seven (7) days per week

Therefore in summary the loading dock in George Street operates in two main modes. These are:

- 24 hours per day seven (7) days a week for a Small Rigid Truck
- 11:00pm – 5:00am at last one day per week for 19.0m semi-trailer access parked in George Street

The existing pedestrian / service vehicle arrangements for the State Theatre are shown in **Figure 3**.

Figure 3 – The State Theatre Existing Pedestrian / Service Vehicle Access Arrangements



As stated above, the State Theatre holds a number of large events during the course of a calendar year. These include major movie premiers which require specific transport management plans to facilitate the large volumes of pedestrians traversing Market Street, VIP's and red carpet arrangements. These have been a feature of Sydney for many decades.

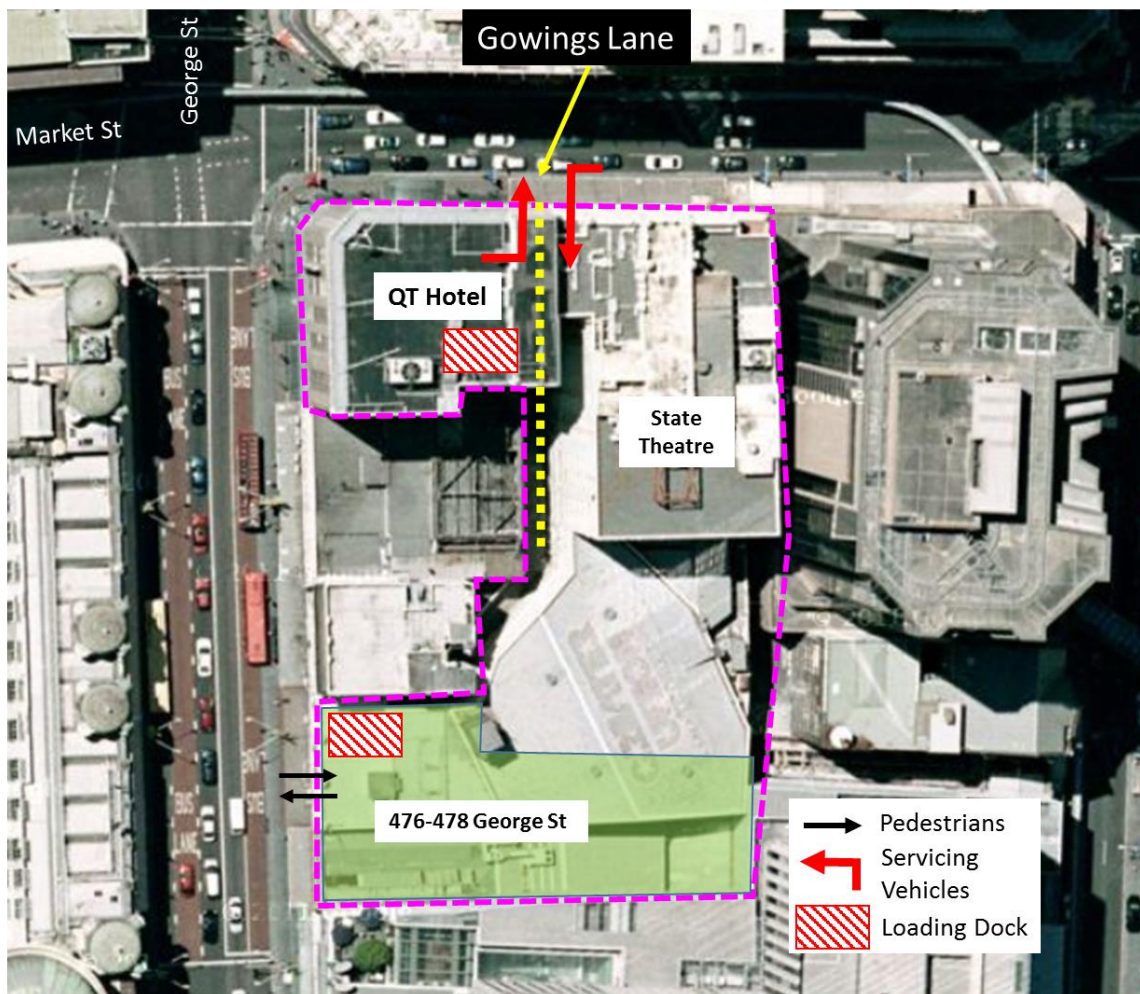
2.1.3 476 – 478 George Street

This development currently under construction includes expansion of the rear stage area of the State Theatre and construction of a mixed use retail / commercial tower with frontage to George Street. The existing loading dock in George Street (discussed in the section above) will be maintained as it provides rear stage access for the State Theatre as described in **Section 2.1.2**.

Pedestrian access will be via George Street. Servicing of the development including the future retail function would be via the existing loading dock in Gowings Lane which services the QT Hotel, the State Theatre and TOPSHOP retail.

The ultimate pedestrian / service vehicle arrangements for the redevelopment of 476-478 George Street are shown in **Figure 4**.

Figure 4 – 476-478 George Street Proposed Pedestrian / Service Vehicle Access Arrangements



2.2 Existing Road Network

2.2.1 Market Street

The current arrangements in Market Street across the frontage of the State Theatre and the QT Hotel Sydney are shown in **Figure 5** below.

Figure 5 – Market St Frontage Existing Parking Arrangements



© Google Maps

No Parking zones are provided on either side of Market Street. However, the existing No Parking zone on the southern side of Market Street servicing the State Theatre can be used by general traffic when vehicles are not standing to set down or pick up passengers. Whereas the No Parking zone on the northern side includes kerb blisters to delineate the parking spaces. The kerb blisters allowed installation of the now-removed Sydney Monorail piers.

2.2.2 George Street

No parking is permitted along the sites' frontages in George Street, with a bus lane installed along the kerbside lane. However, as stated above in section 2.1.2 and shown in Figure 3, 19.0m semi-trailers park in the bus lane during non-bus operational times to service the rear stage of the State Theatre, 'bumping in' and 'bumping out' large volumes of equipment. The existing arrangements and loading dock location are shown in **Figure 6** below.

Figure 6 – George Street Frontage including Loading Dock

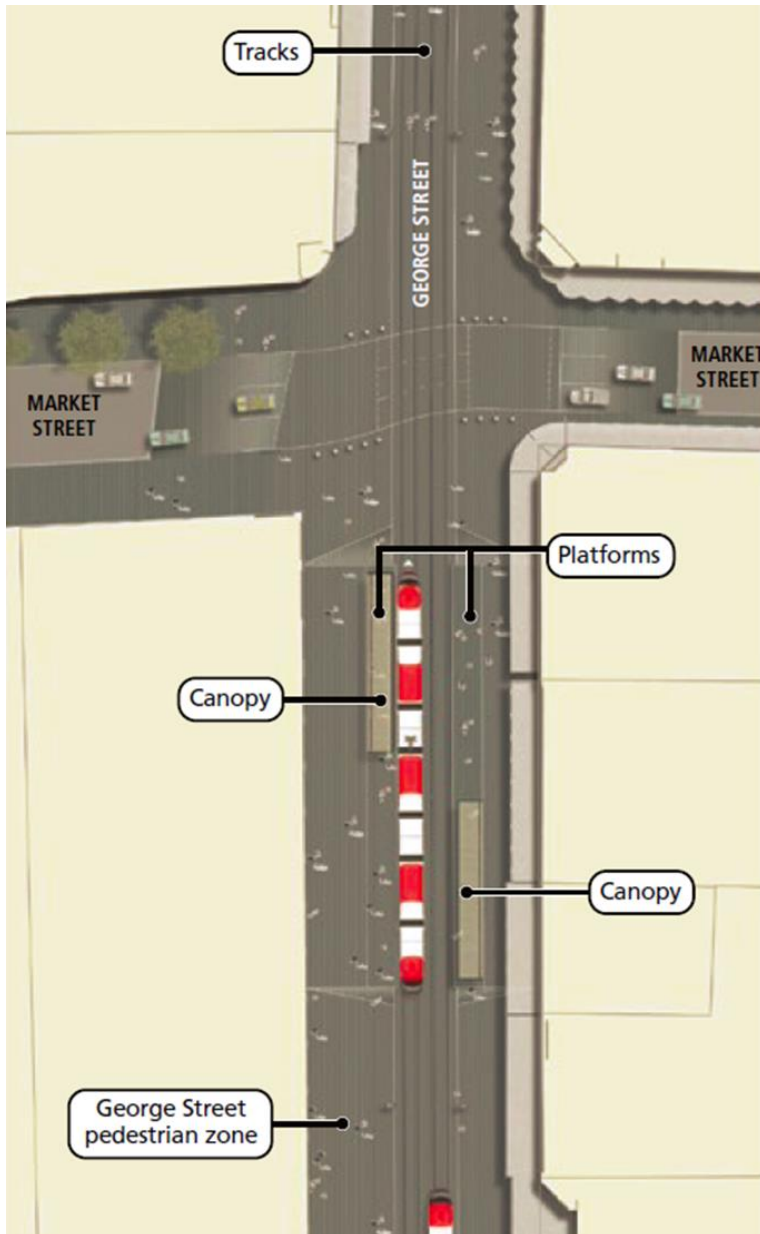


© Google Maps

3. CBD South East Light Rail Project Summary

The proposed CSELR in the vicinity of AHL / GUO land holdings around the corner of George Street and Market Street is provided below in **Figure 7**.

Figure 7 – Proposed CSELR Design in vicinity of QT Hotel / The State Theatre / 476-487 George Street, Sydney



After a review of the EIS, the following comments have been prepared and relate to:

- Overall implications of the proposal on city centre access and hence on the vitality and viability of CBD businesses
- Loading access
- Parking
- Pedestrian amenity and capacity

The proposal will also have other implications, such as noise and vibration, which may impact the sites, but are beyond the scope of this review.

3.1 Overall surface transport CBD access system operations

Capacity of the final system of light rail (CSELR) and re-configured bus networks to support the CBD access task needs to be demonstrated, as well as impacts on perceived costs of system users. The EIS does not address this directly, as bus re-configuration is separate to this project, and is expected to be implemented in 2014, prior to commencement of construction activities.

A short piece of analysis that draws together all the capacity and demand assessments and provides a clear statement from an independent consultant should be provided that clearly identifies that:

- the resulting capacity of the LRT and re-configured bus system would be sufficient for the task; and,
- overall perceived costs of the systems (bus and LRT), from a passenger perspective, would improve travel conditions.

This would provide some comfort to affected stakeholders that what is proposed will be a genuine improvement to existing conditions.

3.1.1 Timing

Construction is expected to commence in mid-2014 and take approximately 5 or 6 years (EIS pg 6-1).

3.1.2 Operations

- Envisaged operating hours are 5:00am to 1:00am seven days a week (EIS pg 5-77).
- Services every 2 to 3 minutes during the peaks (7:30am to 9:30am and 5:00pm to 7:00pm) (EIS pg 5-77).
- LRVs are approximately 45 m long.
- Bus interchange from south west services (Broadway services) would occur at Rawson Place as buses would 'cross-over' light rail; Victoria Road bus services would interchange with LRT at QVB from York Street (EIS pg 5-81).
- Capacity some 9,000 pax per hour (EIS pg E-1).

3.1.3 George Street

Between Bathurst Street and Hunter Street, George Street will become a pedestrianised area with LRT running in the centre with a speed limit of 20 km/hr (EIS pg 3-4). No buses or other vehicles would be permitted to use this section of George Street (EIS pg 5-10).

Implications of this are:

- Improved pedestrian amenity and capacity
- Loading dock access/access to current kerbside loading position potentially impinged
- Displacement of vehicles to other routes within the city/suppression of some trips.

In terms of mitigating access impacts there are ambiguities in the EIS about how this would be managed:

- *"A strategy would also be developed (through further detailed design by Transport for NSW and key stakeholders) to determine levels of access required by delivery vehicles, private vehicles accessing residences and taxis at night." (EIS pg 5-10)*
- *"Emergency vehicles, property owners and occupiers, resident delivery and maintenance trucks would retain access to existing driveways and laneways within the pedestrian zone 24-hours a day. Larger delivery vehicles would be permitted during restricted hours to be determined during the detailed design of the proposal." (EIS pg 5-58)*
- *"A pedestrian and vehicle shared zone is proposed on George Street, between Bathurst and Hunter streets and adjacent to the proposed CSELR corridor. This shared zone would allow vehicles to use an area of the pedestrian zone to travel down the side of the CSELR corridor (at a maximum speed of 10 kilometres per hour) to access driveways and loading areas, where vehicles would be able to park to service properties on either side of George Street." (EIS pg 12-20)*

The EIS refers to the State Theatre loading dock on George Street ambiguously:

- EIS Pg 12-4, Figure 12.2a shows the State Theatre loading dock on George Street – this shows it as a blue dot and is designated as a 'loading dock'.
- It is also noted in Table 12.5 on pg 12-9, but as '478 George Street/State Theatre Annex (east side, Market Street-Park Street)' as a 'footpath/ramp access to street'.
- Technical Paper 1 pg 57/8 Table 2-15, refers to the dock as a 'footpath/ramp access to street', with Figure 2.11 pg 59.

The Light Rail stop is proposed at QVB which is in proximity to the current loading dock on George Street (Figure 5-1A, pg 5-2). This would also form an interchange point with the bus network at QVB (York Street) and the proposed CSELR (EIS pg 5-17 and Pg 5-81). This will require co-ordination during construction to maintain access to the State Theatre's loading dock on George Street. It will also require consideration during design to maintain access to the State Theatre's loading dock on George Street during CSELR operation. Additional pedestrian traffic in this area may also require some management measures during construction and operations of the CSELR.

3.1.4 Construction Zone Access for redevelopment of 476-478 George Street

The following is noted from the EIS:

478 George Street (former Mick Simmons building)

"A development application for 478 George Street proposes a new 16 storey office building with retail on the lower level and upgrades to the existing State Theatre Annex Building. Access to this site is via a work zone in a temporary, indented parking bay in the George Street footpath, which permits vehicles to stand and unload materials without obstructing the George Street bus lane. During the construction of the CSELR proposal, this work zone for 478 George Street would not be available on major event days (including New Years Eve, New Years Day, Australia Day, etc.) and no construction activity would occur during December."

"The controlled access lane would be available for access to the indented work zone; however, the building owners and contractor would be consulted to coordinate work and access requirements, particularly for the time when the CSELR works are being undertaken within this section of George Street." (EIS pg 12-35)"

3.1.5 Road network configuration with CSELR integration

Intersections along George Street would retain east-west traffic movements (EIS pg 5-10, 5-58). This would simplify movements, as no turns to from George Street would be accommodated. This would substantially reduce the conflicts between left turning traffic and pedestrians at crossings.

It is also identified as a potential opportunity to mitigate the loss of on-street loading zone capacity:

'Market Street — The removal of the monorail (which does not form part of the CSELR proposal) and left turn lane into George Street would present an opportunity for additional loading capacity on one side of Market Street to the east of George Street. The provision of new loading or parking at this location would need to be balanced against the need for potential future pedestrian footpath capacity enhancements, as this location has been shown to experience significant pedestrian volumes and low LoS for pedestrians.' (EIS pg 12-28)¹

Technical paper 1 pg 186 figure 5-26 shows Market Street east of George Street as *'proposed priority improvements'* (also see pg 190, figure 5-28), without specifying what these might entail.

The QVB Precinct Access Plan (Technical paper 1, pg 297, section 7.3.5 and figure 7-4) indicates an interchange function from CSELR's QVB stop on George Street, around the corner to Market Street (past the frontage of the State Theatre), to a new/proposed bus interchange at the corner of Pitt and Market Street.²

Operational impacts on property and the process to manage this are discussed in the EIS:

¹ See also Technical paper 1 pg 283, table 67-22 – local area mitigation for CBD.

² Diversion of George Street buses is not clear – in the EIS it says diversion to Elizabeth Street and Pitt Street (EIS pg 12-25), in Technical paper 1 it says to Elizabeth Street and Castlereagh Street (Technical paper 1 pg 127)

George Street

As outlined in section 12.3.1, there are a number of property accesses (private car parking or loading docks) situated along the proposed CSELR alignment on George Street. The locations of key traffic generating driveways with access to George Street are shown in Figures 12.2a and 12.2b and described in Table 12.5.

General traffic access to the pedestrianised section of George Street (between Bathurst Street and Hunter Street) would be under restrictions to be developed as part of the SCCAS. No entry controls would be implemented within the pedestrian zone, with appropriate exceptions for residents, light commercial deliveries, emergency vehicles and taxis.

All existing property accesses along George Street would be maintained during the operational phase of the CSELR proposal; however, certain restrictions are likely to apply. These would be developed and implemented by the relevant roads authority and could include:

- access restrictions implemented by the City of Sydney to provide for appropriate safety and amenity for pedestrians, which would be determined by City of Sydney, in consultation with Transport for NSW*
- limitations on driveway access along the proposed CSELR corridor to left-in left-out only, where feasible.*

The above access restrictions would result in increased travel distances for some service vehicles as their approach routes would be affected by the right turn bans. Any access restrictions required for the CSELR proposal would be subject to further consultation between the affected parties, Transport for NSW and City of Sydney. A case by case consideration of each affected property access would be undertaken during detailed design (in consultation with the affected parties) to determine the access restrictions required along the proposed CSELR route.

Vehicles entering or leaving private driveways have the potential to affect light rail operations and represent a safety hazard when undertaking turning movements across the CSELR alignment particularly given the proximity of the QVB LRT structures. Measures that Transport for NSW proposes to manage these impacts are outlined in section 12.3.4. (EIS pg 12-22)

Our client needs to be actively engaged in this process to ensure that access to their properties is maintained.

Construction

Much of the detail of construction impacts is indicative as there may be changes when a contractor is appointed and potentially determines a different approach to construction. Pedestrian traffic management (EIS pg 6-44):

"For the majority of the main construction works, existing longitudinal pedestrian movements (i.e. pedestrian movements running parallel to the CSELR alignment) would be maintained along the footpaths. Transverse pedestrian movements (i.e. pedestrian movements crossing the CSELR alignment) would generally be maintained at existing pedestrian crossing facilities either at signals or controlled by traffic controllers. While the mid-block transverse pedestrian crossing at Martin Place would be maintained during construction, the mid-block crossings at the Strand Arcade, Queen Victoria Building and Event Cinemas (on George Street) would be closed during construction."

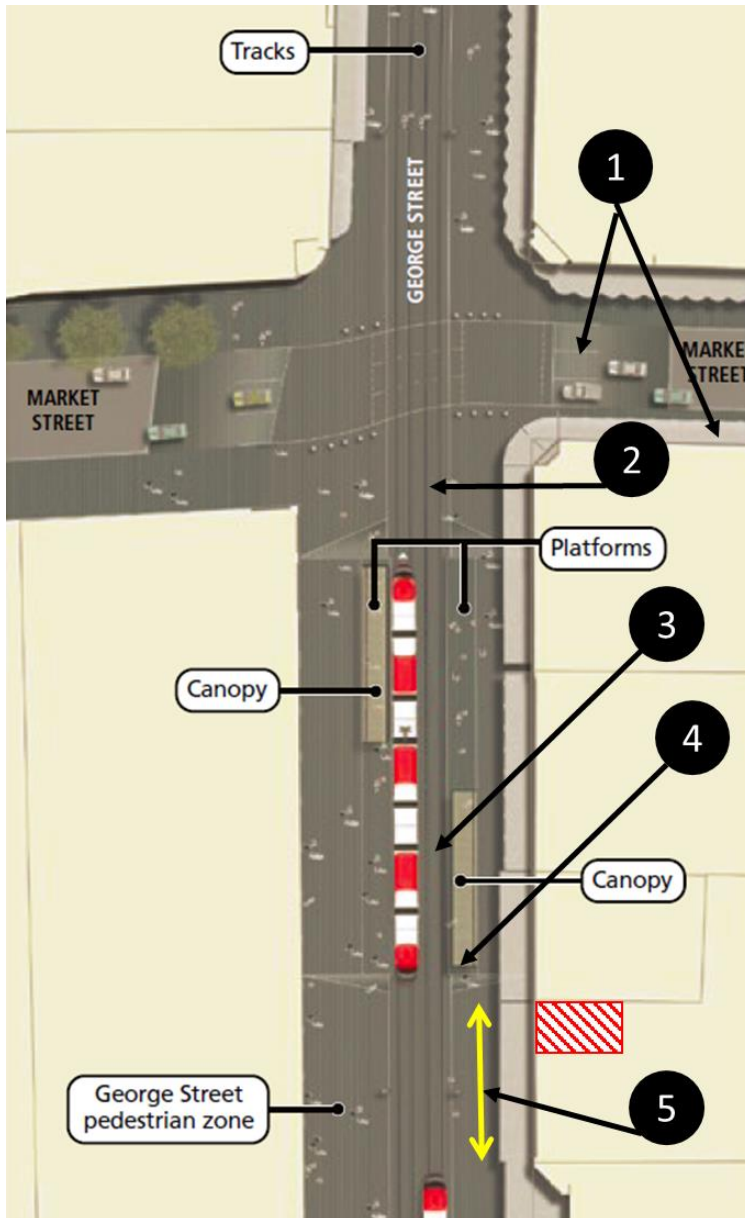
The QVB LRT stop would be constructed (as with other stops) independently of the alignment works.



4. Identified Issues / Recommended Changes for inclusion in CSELR Design

The following items have been identified as both potential issues and opportunities with the construction of the CSELR project. These are shown below diagrammatically in Figure 8.

Figure 8 – Items for Consideration



4.1 Item 1 – Formalisation of the State Theatre Drop Off Facility in Market Street

As shown in Figure 8, Market Street is proposed as three (3) trafficable lanes westbound. However, the existing No Parking zone outside the QT Hotel and State Theatre is not accounted for, which during most times of the day, includes standing vehicles setting down and picking up passengers.

With the removal of the Sydney Monorail, there is an opportunity to reconfigure the kerb and gutter on the southern side of Market Street to provide a formalized drop-off zone, which would service the QT Hotel / the State Theatre and include a trafficable lane on the northern side of Market Street.

This proposed arrangement would still achieve three (3) westbound trafficable lanes in Market Street and thus no loss of road capacity. Further, it would provide a significant benefit to the precinct, including the State Theatre, to better and more safely manage the kerbside space along the frontage, especially during large events such as major movie premiers.

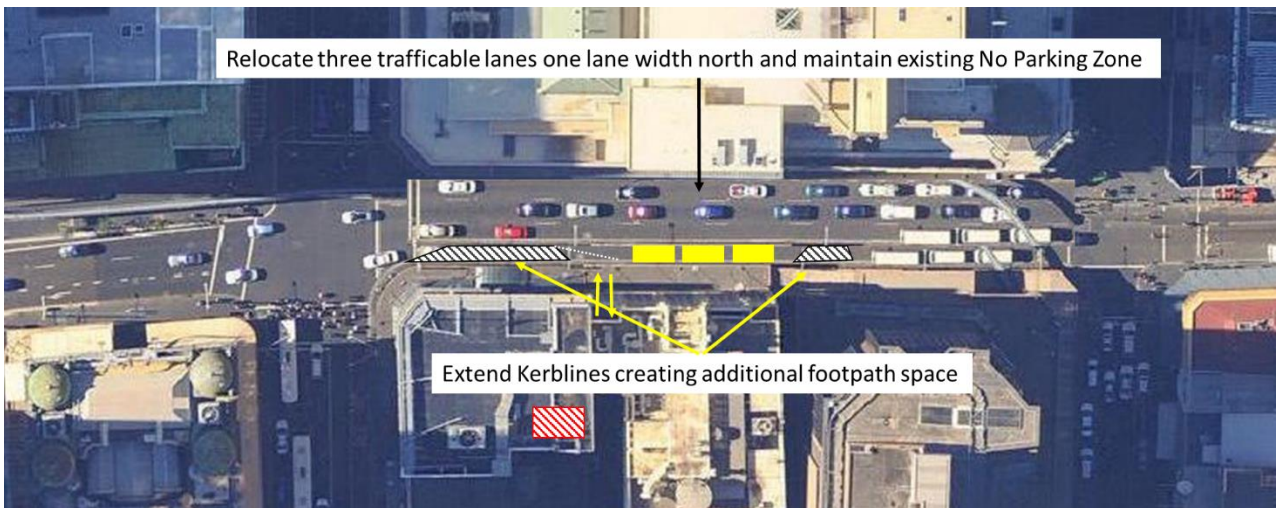
Where possible, the State Theatre would seek widening of the footpaths on the southern side of Market Street to increase capacity particularly adjacent to the TOPSHOP frontage. The recommended arrangements are shown in **Figure 9**.

Figure 9 – Item 1 – Recommended Market Street Traffic / Parking / Footpath Arrangements

Existing



Future



From **Figure 9** it can be seen that the recommended changes to Market Street would not in any way diminish road capacity³ but would significantly improve pedestrian and drop off arrangements for the heritage listed Sydney State Theatre along with the QT Hotel. The existing No Parking zone on the northern side of Market Street servicing the Swissotel can remain and used as required which mirrors the current arrangements for the State Theatre and QT Hotel. Alternatively, the formal drop off / pick up area outside the State Theatre could also act as a safe drop off arrangement for the Swissotel across the road as the kerb will be on the LHS of vehicles. Patrons of the Swissotel would then cross the road at the signalized intersection of Market & George St or Pitt St Mall.

4.2 Item 2 – Access to Loading Dock – George Street and Market Street

In general, access to loading docks in both Market Street and George Street must be maintained 24 hours per day seven (7) days a week.

4.3 Item 3 – Semi Trailer Access to George Street Loading Dock

As stated in Section 2.1.2 of this report, servicing of the State Theatre for large events (numbering in the order of one per week over a calendar year) is undertaken by a 19.0m semi-trailer parked in George Street.

It is recommended the design / operation of the CSELR must include:

- Provision for semi-trailers to travel to and from this loading dock (drop this -> 'along rail tracks')
- Provision for semi-trailer to park in a location that is equivalent to the existing arrangements for loading and unloading to / from existing George Street loading dock servicing the State Theatre.

Of concern is the proposed operating hours of the CSELR which is listed to be 5:00am to 1:00am seven days a week (EIS page 5-77). Access to the loading dock in George Street is currently permitted between the hours of 11:00pm – 5:00am.

Therefore the proposed operating hours of the CSELR would result in the loss of two (2) hours per night in the allocated window of time to service the State Theatre (33% reduction).

Of further concern is Section 12.3.1 of the EIS which states:

“No entry controls would be implemented within the pedestrian zone, with appropriate exceptions for residents, light commercial deliveries, emergency vehicles and taxis.”

³ With the proposed simplification of the intersection's turning movements, it is likely that the ability of this intersection to process Market Street traffic would be substantially enhanced.

GUO requests that the proponent confirm the access for 19.0m semi-trailers would be included in the design of the CSELR and associated footpath works, so servicing the State Theatre via the existing loading dock in George Street can continue unimpeded. Further, confirmation that 19.0m semi-trailer access would be available as is currently permitted between the hours of 11:00pm – 1:00pm, whilst the CSELR is being constructed and whilst it is in operation.

4.4 Item 4 – CSELR Canopy Position adjacent to George St Loading Dock

The proposed location of the southbound QVB light rail stop canopy appears to be located very close to the existing George Street loading dock servicing the State Theatre. This dock can accommodate a Small Rigid Truck (6.4m in length). Further, the truck is required to reverse into George Street.

It is recommended that the design / location of the QVB CSELR stop is such that it allows a small rigid truck to reverse out of the existing George Street loading dock unimpeded.

4.5 Item 5 – 476 to 478 George Street Redevelopment Construction Zone

The following is noted from the EIS:

During the construction of the CSELR proposal, this work zone for 478 George Street would not be available on major event days (including New Year's Eve, New Year's Day, Australia Day, etc.) and no construction activity would occur during December.

As stated in Section 2.1.3 of this report, the redevelopment of 476 to 478 George Street is due for completion and opening in October 2015. In addition, major fit out works are proposed during June 2015 and subsequently from July – October 2015 with fit out of the lower level retail tenancies. A construction zone is proposed for the entire construction period which would potentially overlap with the construction of the CSELR.

The proposed loss of access to this construction zone during December for the construction of the development at 476-478 George Street would have significant cost implications and development delivery repercussions.

It is recommended that CSELR works in George Street in the vicinity of 476 – 478 George Street be programmed to commence after October 2015. Alternatively, that Transport for NSW provides confirmation that construction vehicle access to 476-478 George Street will remain in place until the completion of the redevelopment of 476 to 478 George Street and retail fitout works (currently envisaged to be the end of October 2015) as currently planned.

5. Summary / Recommended Changes and Inclusions

This assessment of the EIS for the CBD South East Light Rail project has identified a number of potential impacts and opportunities for improvement as part of the delivery of the project. These items and comments on recommended inclusions / changes are summarised in **Table 1**.

Table 1 - CSELRL Issue Identification / Recommended Changes

Item No.	Item	Comments / Recommendations
1	Market Street State Theatre Formal Drop Off Facility	Design of Market Street provides three westbound lanes using northern side parking lane to create formal drop off facility for the State Theatre on southern side
2	Service Vehicle Access to Loading Dock in George Street	TfNSW confirms to AHL and GUO that service vehicle access will be available 24 hours per day seven (7) days per week to existing loading dock at 476/478 George St
3	Semi-Trailer servicing of State Theatre in George Street	TfNSW confirms design of CSELRL will permit 19.0m semi-trailer traversing tracks. TfNSW confirms design and operation of CSELRL will allow semi-trailers to access existing loading dock at 476-478 George Street to service the State Theatre between the hours of 11:00pm – 5:00am seven (7) days per week.
4	CSELRL southbound stop in George St (QVB) adjacent to 476-478 George St loading dock	Location of southbound stop canopy allows SRV to reverse from existing loading dock at 476-478 George St unimpeded
5	Construction zone for redevelopment of 476-478 George St	TfNSW confirms that redevelopment of 476-478 George Street can continue unimpeded till it is complete (currently envisaged to be the end of October 2015) as planned TfNSW confirms the construction zone in George Street to service the redevelopment of 476 to 478 George Street will remain in place (only excluding major events) until it is completed (currently envisaged to be the end of October 2015).
6	Overall surface transport CBD access system operations	In assessing this EIS, it is recommended that the proponent is required to satisfy DP&I that the CSELRL and re-configured CBD bus system: Will have sufficient capacity to meet the transport task. Perceived costs of system users will be improved.