



11 December 2013

Our ref: AKB/11-036E

Department of Planning and Infrastructure
23-33 Bridge Street
SYDNEY NSW 2000

Dear Sir / Madam,

re: Submission to CBD and South East Light Rail Project Environmental Impact Statement

This letter comprises a submission to exhibition of the CBD and South East Light Rail Environmental Impact Statement (EIS), referred to herein as the CSELR proposal. The submission is made on behalf of Lend Lease Development Pty Limited (Lend Lease), specifically in relation to Lend Lease's interests in 174-176A George Street (Jacksons on George) and 182 George Street.

1 Lend Lease Interest

Lend Lease is the owner of Jacksons on George at 174-176A George Street. In addition, Lend Lease has an option to purchase the property known as 182 George Street, along with the adjoining property at 33-35 Pitt Street, from Westpac Banking Corporation. The option is expected to be exercised in October 2015 when Westpac relocates to Barangaroo.

Lend Lease is currently reviewing a number of redevelopment or refurbishment options for its properties within the so-called Lend Lease Circular Quay (LLCQ) site, that could be commenced as early as October 2015. The options comprise: no change; refurbish; or entirely redevelop, each of which should be accommodated by the CSELR proposal..

Transport for NSW have advised that Lend Lease's time frames for redevelopment or refurbishment of Lend Lease's George Street properties will overlap with the timing of the CSELR project.

Lend Lease requests that the following submission is taken into consideration.

2 Submission

2.1 Lend Lease Support

Lend Lease supports the CSELR project and is keen to work closely with Transport for NSW and its contractors in the planning, design and construction phases.

2.2 Maintenance of Access to Blue Anchor Lane

Blue Anchor Lane currently provides access to car parking and loading docks of a number of properties, including 182 George and 174-176A George Street. Figure 12.2a of Chapter 12 of the EIS identifies Blue Anchor Lane as a “private driveway”. This is not accurate. Blue Anchor Lane is a privately owned laneway which is affected by permanent legal easements for access to various parties including the Council of the City of Sydney.

Blue Anchor Lane is currently available for unrestricted access by vehicles of over 10 metres in length, 24 hours a day. Due to the generous width of Blue Anchor Lane and width of George Street, the lane can currently accommodate fixed rigid vehicles of over 10 metres. It also accommodates an existing loading zone that services both 182 George and Jacksons on George

Lend Lease understands that there will be restrictions put in place in relation to the frequency and ease of access to Blue Anchor Lane during construction of the CSELR. This is a concern as Lend Lease will require ongoing access to and from George Street for the purpose of servicing 182 George and 174-176A George Street and the loading zone.

In relation to the operation of the CSELR, the EIS states that 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 alignment.

It is vital that access and egress is retained at current levels to tenant parking and service vehicle parking and loading areas, both during the construction and operational phases of the CSELR, whether or not the refurbishment or redevelopment of the Lend Lease properties is undertaken. Lend Lease is particularly concerned that the full range of service vehicles are able to access and egress from Blue Anchor Lane notwithstanding the narrowed carriageway proposed in George Street.

2.3 Lend Lease Construction Zone Considerations

There are a number of important requirements which should be taken into consideration.

- Lend Lease will require the establishment of a full length (174 to 182 George Street) construction zone on George Street from as early as October 2015, in the likely event of either a refurbishment and/or redevelopment of Jacksons on George and 182 George Street. The inability to establish a construction zone at the appropriate time will undermine the feasibility of Lend Lease’s project to a significant extent.
- Heavily loaded Semi-trailers would need to access/egress the refurbishment / redevelopment construction site.
- Lend Lease requires the ability to erect/dismantle a tower crane from George Street in the event of refurbishment / redevelopment.
- Lend Lease may also need to install rock anchors for the purpose of excavation and basement retention that it may contemplate as part of any redevelopment. The coordination of anchors with existing / relocated services will need to be addressed.

2.4 Noise, Dust, and Vibration

Lend Lease is concerned to ensure that construction impacts relating to noise, dust and vibration are appropriately managed so as to minimise any impacts on existing premises.

2.5 Timing and implementation of Construction Environmental Management Plan

It is understood that the detailed management plans, relating to construction, traffic and the like, will be developed by the Light Rail contractor. Lend Lease requests the opportunity to be engaged in relation to the detail of the management plans.

2.6 Changes to access and local traffic conditions

Changes to vehicle access to George Street (including taxis, buses and privately owned vehicles) during as well as the redirection of pedestrians during construction will reduce the perceived ease of access and attractiveness for visitors/clients.

The attractiveness of the site as a work place during construction may be reduced with tenants finding it an inconvenience getting to work.

For these reasons, Lend Lease is keen to ensure that ongoing easy access/egress to the premises is maintained, and that convenient access to public transport hubs is maintained throughout the construction phase.

2.7 Impact on night time economy

There is the potential for significant detrimental impacts to occur to the operations of Jacksons on George during the construction phase, as a result of perceived access constraints, changes to taxi pick-up and drop-off points, as well as the reduced amenity of the George Street construction zone.

Lend Lease is particularly concerned about the impact on outdoor seating. Jacksons on George enjoys a development consent, liquor licence and footway approval relating to the placement of chairs and tables on the George Street footpath. Clarification is required in relation to this issue.

2.8 Infrastructure and services

Lend Lease is concerned to ensure that all infrastructure services are uninterrupted.

Street lighting should be maintained.

Emergency access should be maintained to the buildings.

Unobstructed access to hydrant points (which should remain operational throughout) is required.

2.9 Place Managers

Lend Lease requests a condition requiring the appointment of Place Managers throughout the construction phase as recommended in the Social Impact Assessment accompanying the EIS.

2.10 Early Investigative Works

In September 2013, BBC Consulting Planners on behalf of Lend Lease lodged a submission in relation to the exhibition of a draft amendment to the Infrastructure SEPP which related to Light Rail. The submission raised concern about the identification of a wide range of development or works as exempt development under the Infrastructure SEPP. Our concern was based on the fact that certain works which may be appropriately undertaken without the need for any form of environmental assessment within a typical separated rail corridor, may not be suitable within the integrated, on-street light rail corridor. Despite these concerns, the SEPP amendment has now commenced.

We note that preliminary works may now be undertaken as exempt development. However, the 'FAQ' document exhibited with the draft SEPP amendment contained an undertaking that Transport for NSW would self-assess the works under Part 5 of the Act. We request that this undertaking be honoured and that appropriate impact assessment occur, albeit within Transport for NSW.

3 Conclusion

We thank you for considering this submission, and invite you to contact the undersigned on 9211 4099, or the client contact Warwick Bowyer of Lend Lease on 0417 697 834 / email warwick.bowyer@lendlease.com if any clarification is required.

Yours faithfully

BBC Consulting Planners

A handwritten signature in blue ink, appearing to read 'Alison Brown', with a long, sweeping horizontal line extending to the right.

Alison Brown
Associate Director

Email alison.brown@bbcplanners.com.au