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**Attention: Director, Infrastructure Projects Branch**

Dear Sir/Madam,

**Re: CBD and South East Light Rail Project – Submission on behalf of YHA (NSW) Pty Ltd – Sydney Central YHA, 11 Rawson Place, Sydney**

We act on behalf of YHA Ltd (“YHA”) which owns and operates the Sydney Central YHA at 11 Rawson Place (Daking House) Sydney. Our client has requested we review the EIS for the CBD and South East Light Rail (CSELR) project currently on public exhibition and make this submission on its behalf. This submission focuses on proposals contained in the EIS for Rawson Place, Rawson Lane and the immediately surrounding area.

Our client wishes to express its strong concern that it was not consulted in the development of this proposal and, in particular, it was not consulted about the relocation of the light rail interchange from Eddy Avenue to Rawson Place, as is now proposed. As this submission will set out this failure to take into account the existing operations and needs of the Sydney Central YHA and its guests has resulted in a flawed proposal. While discussions have more recently taken place between our client and officers of Transport for NSW, these have not addressed or allayed our client’s strong objections and concerns regarding the CSELR and the significant adverse impacts it will have on the operations of the Sydney Central YHA.

## **Background – Sydney Central YHA**

The Sydney Central YHA (“SCYHA”) at 11 Rawson Place (Daking House) opened as a youth hostel in 1997 and accommodates up to 556 guests.

Daking House is listed as a heritage item under Sydney LEP 2012. Together with the adjoining ‘790 on George’ (Station House) it forms the Rawson Place Group, noted as being fine examples of Federation Free Style urban commercial architecture with a high

degree of landmark value. Built in 1913, Daking House represents the Sydney streetscape prior to the Second World War. The building is subject to a Conservation Management Plan and Code of Practice: Conservation of Significant Heritage Fabric. It is also the subject of a Heritage Floor Space Deed with Sydney City Council.

SCYHA is one of the largest and busiest youth hostels in the world, recording more than 160,000 overnights per year. It hosts up to 60,000 guests per year with an average length of stay of 2.6 nights. On average, 185 people and their luggage arrive and depart each day (ie. a total of 370 movements) with peaks being significantly higher (up to around 420 people arriving and departing).

SCYHA includes ground floor tenancies of a 70 seat restaurant, travel agency, convenience store and basement bar.

Usage of SCYHA is made up of Australian and International guests and is divided between individuals, families and organised groups.

Individual guests staying at SCYHA arrive and depart by a variety of means including airport shuttle bus, taxi, airport train, tour bus, long distance bus and by private car (6 parking spaces provided on site).

In 2012, a total of 426 organised groups of varying sizes stayed at SCYHA, the majority being primary and secondary school groups. The majority (87%) of groups staying at SCYHA arrive and depart by either coach or shuttle bus.

A major factor in the selection by YHA of Daking House for conversion to a youth hostel was the vehicle lay-by on Rawson Place which is used for drop-off and pick-up by coaches, shuttle buses, taxis and day tour buses. Guests are protected while waiting with their luggage by the shelter provided by the SCYHA awning fronting Rawson Place. The lay-by, which has a length of around 50 metres, is also used by the adjacent hostel known as “790 on George”. As noted above, 87% of groups staying at SCYHA use this lay-by when arriving and departing. In addition, by YHA’s own survey, 35-40% of individual guests also arrive and depart via forms of transport which use the lay-by.

The Rawson Place lay-by serves not only over 800 beds at SCYHA and ‘790 on George’ but as a precinct hub for day and overnight tours, together with another 500 beds at the ‘Wake Up’ backpackers hostel on Pitt Street and a further 1100 beds from the Maze and Nomads hostels in Pitt Street and the Railway Square YHA hostel in Lee Street. This totals an accommodation capacity of 2400 with a year round occupancy of 75%-80%.

At times, the frontage to Rawson Place is very busy with guests and their luggage in particular when school groups arrive. Some guests have backpacks but suitcases are also common. The guests at the SCYHA are there for a short time, are unfamiliar with Sydney, are in many cases also trying to adapt to an unfamiliar language and a new time zone after long flights. There is already congestion on the Rawson Place frontage outside the SCYHA and competition for space between guests arriving and leaving with their luggage and the very heavy pedestrian traffic between Central Station and George Street/Chinatown.

The majority of the groups that stay at the SCYHA are school groups from regional NSW. Before undertaking excursions teachers are required to complete assessments for the management of risks in accordance with the Excursions Policy Implementation Procedures

of the NSW Department of Education and Training or, in the case of private schools, the equivalent policy document for the private school sector. It is YHA's experience that these risk assessments are becoming increasingly onerous on teachers. The absence of a safe drop off/pick up point for Sydney CBD accommodation for children from regional schools will constitute a new risk. It is also relevant that there are very few alternatives for schools seeking safe budget accommodation in Sydney

Due to the year-end timing of the exhibition of the CSELR EIS and the limited period allowed for submissions, YHA has not been able to engage with its school group users regarding the proposed loss of coach access and foreshadows that it may make further submissions on this matter in 2014.

There are also a range of deliveries and services to and from the SCYHA which utilise both the lay-by in Rawson Place and Rawson Lane to access the SCYHA. These services include maintenance, garbage, laundry, food and liquid supplies for the tenancies and vending machines, security services, building engineering and tradesmen.

Deliveries and services are undertaken on a daily (4 visits), weekly (14 visits) or monthly (15 visits) basis and generally utilise the lay-by in front of the SCYHA, with some using the on-site car park. In addition, on average, there are 4 maintenance contractor visits with tradesmen vans per week to the SCYHA.

Laundry is delivered to and collected from the SCYHA twice per day via Rawson Lane and there is a garbage pick-up also via the Lane once per day.

SCYHA's basement car park, also accessed via Rawson Lane, contains 11 available parking spaces. These spaces are used as follows:

- SCYHA guests – 6 spaces;
- Disabled parking – 1 space;
- SCYHA management – 1 space;
- Tenants – 2 spaces; and
- Contractors – 1 space.

The SCYHA guest parking is generally fully utilised on a daily basis, as is the tenant parking. The SCYHA management space is used daily Monday to Friday, while the contractor space is used as needed as referred to above.

In addition, a significant number of coach/bus tour operators use the lay-by outside the SCYHA for pick-ups and drop-offs. These include Macquarie Educational Tours, EF Language, Educational Excursions, Trekset, Stewarts Coaches, World Projects, AAT Kings/Downunder, Colourful Trips, TopDeck, Wayoutback, Unearthed, Oz Snow Adventures, Understand Down Under, Oz Party, Surf Camp, Oz Trek, Boutique Tours, Activity Tours, Grayline, Kangariffic, Waves, FJ Tours, Oz Trails, Mojo Surf, Airbus, KST and Airport Connect, with the last three being airport shuttles. Many guests with luggage prefer the amenity of the airport shuttle over the airport train which is some 400 metres away and on the far (eastern) side of Central Station.

Further, there are 9 neighbouring businesses in Rawson Place, Pitt Street and George Street that back onto Rawson Lane. SCYHA's bins are stored in the basement but other businesses keep theirs on the Lane. Rawson Lane is congested at different times of the day

and the access to Pitt Street and Rawson Place is necessary as larger vehicles like garbage trucks cannot turn around.

### **CSELR Proposals in and around Rawson Place**

The following extracts from the EIS describe the CSELR proposals for Rawson Place:

- *At Rawson Place, the proposal alignment would turn west and travel along Rawson Place and Eddy Avenue before turning south onto Chalmers Street. Two interchange stops would be provided along this section including the Rawson Place stop and Central Station stop in Chalmers Street. Rawson Place would be closed to general traffic providing only bus and light rail access along this street. (p. 5-10)*

- **Rawson Place stop**

*The Rawson Place stop would be located along Rawson Place between Pitt Street and George Street and would allow flexibility for bus stop locations either in Rawson Place itself, on Pitt Street or Barlow Street (to the north of Rawson Place). Rawson Place would serve as the main interchange stop for the Parramatta Road/Broadway bus services. ...*

*There is currently vehicle access from Rawson Lane into Rawson Place. This access is primarily for waste collection vehicles to service the buildings on Rawson Lane and would be closed as part of the Rawson Place stop. Preliminary assessment resulting from the closure of Rawson Lane has identified that access is possible for waste collection vehicle access to Rawson Lane via Pitt Street, with a 6.4 metre small rigid vehicle. Access for larger vehicles (standard 8.8 metre vehicles) would not be possible. Further development of access to this location would be undertaken during detailed design (p. 5-32).*

- *With the implementation of the CSELR proposal on George Street and the redesign of the city centre bus network, Rawson Place would become a major interchange for bus and light rail passengers. To facilitate efficient bus and light rail movements, Rawson Place would be closed to general traffic and would only accommodate westbound bus movements, service vehicles, emergency vehicles and the proposed light rail vehicles (LRVs).*

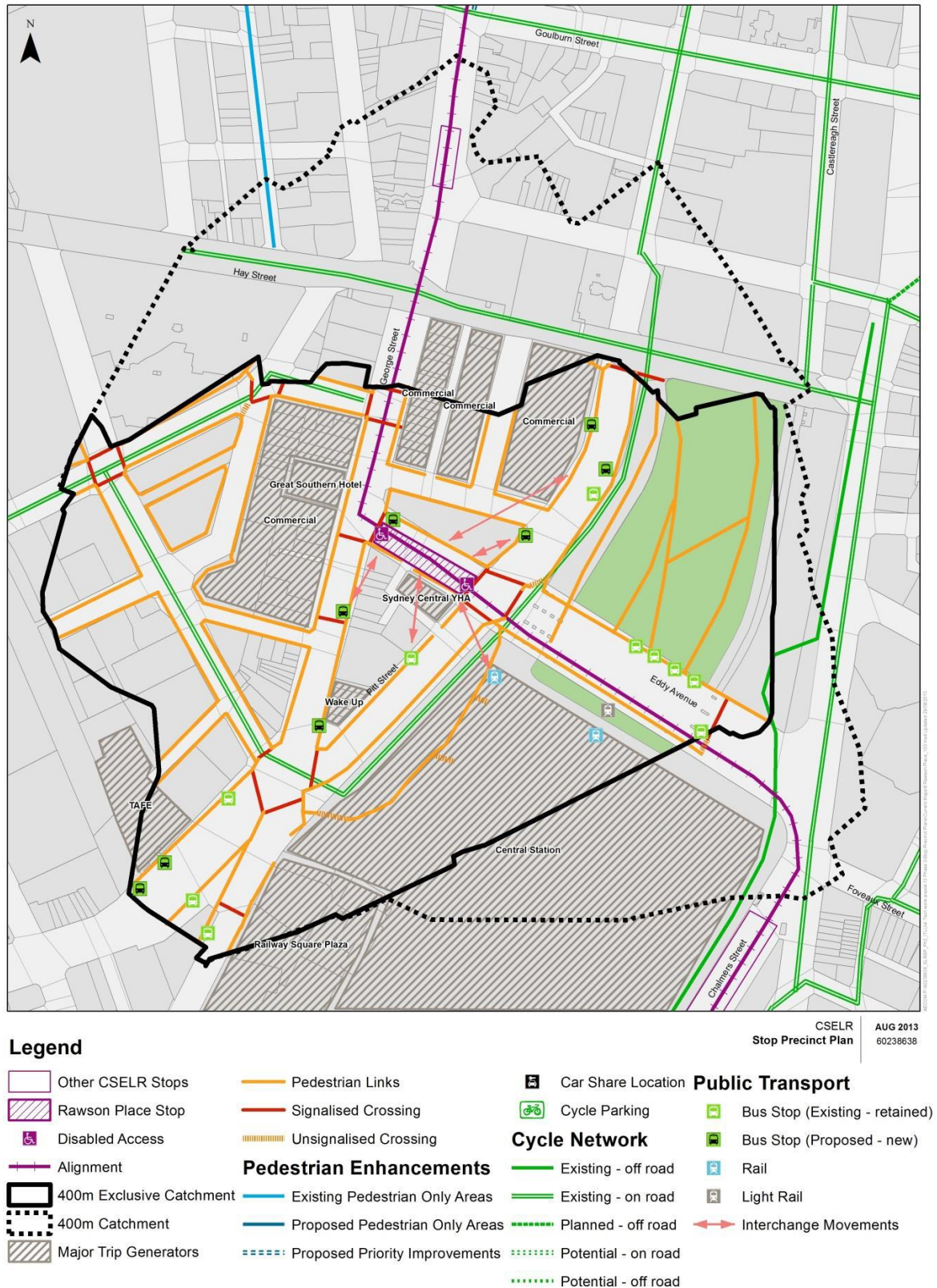
*The functional changes to Rawson Place have been designed to complement the redesign of the Sydney bus network and to provide the required bus stopping and turn around capacity required to operate reliable bus services to the CBD...*

*Due to the volume of bus services in this precinct, additional stops for city-bound bus services would be provided on the western side of Pitt Street, just north and south of Rawson Place. These stop locations would enable bus passengers to transfer to light rail without crossing any roads (pp. 12-20 - 21).*

- *The closure of Rawson Place would necessitate the removal of short stay parking and loading zones along this road. However, there would be opportunities to relocate the loading zones to the following locations:*
  - *Pitt Street, south of Eddy Avenue*
  - *Barlow Street, east of George Street*

- *George Street, south of Rawson Place.* (p. 12-28)

Shown below is the Rawson Place Precinct Access Plan (Figure 7-9 in Technical Paper 1 (p. 312) to the EIS).



The impact of the CSELR on the functioning of Rawson Place is summarised in Table 5-2 (p. 148) in Technical Paper 1 to the EIS, as follows:

Use	Future network characteristics
<b>General traffic</b>	The key changes to general traffic operation in the vicinity of Rawson Place include: <ul style="list-style-type: none"> <li>• No general traffic access to Rawson Place.</li> <li>• Introduction of right turn movement from Eddy Avenue to Pitt Street.</li> <li>• To accommodate light rail and bus interchange, Rawson Ln between Rawson Place and Pitt St will be closed to general traffic.</li> </ul>
<b>Buses</b>	With the introduction of light rail along George St the existing bus services will be relocated in accordance with the city centre bus network redesign. The future changes to the bus services include: <ul style="list-style-type: none"> <li>• City bound bus services currently using George St will be rerouted to Pitt St and Elizabeth St.</li> <li>• Out bound bus service will be rerouted via Pitt St and Rawson Pl.</li> <li>• Major interchange between bus and light rail at the Rawson Pl.</li> </ul>
<b>Property access</b>	Access to Rawson Lane from Rawson Place would not be possible due to the light rail stop location. It has been observed that current service vehicles are able to turn around within the lane way.
<b>On-street parking</b>	The closure of Rawson Pl necessitates the removal of short stay parking and loading zones along Rawson Pl. However, opportunities to relocate the loading zones include: <ul style="list-style-type: none"> <li>• Pitt St, south of Eddy Avenue</li> <li>• Barlow St, east of George St</li> <li>• George St, south of Rawson Pl</li> </ul>

## Objections to the CSELR

From the outset, we note that YHA has no in principle objection to the proposed CSELR or the expansion of light rail services in the CBD and wider area.

However, it has a number of strong objections to the proposals for Rawson Place, Rawson Lane and surrounding streets as they will have a significant adverse impact on the operation of the SCYHA.

### *Objections to the Loss of the Rawson Place Lay-By*

Firstly, YHA strongly objects to the loss of the existing lay-by area in front of the SCYHA and the neighbouring '790 on George' premises or any proposal which would otherwise result in the loss of the ability to use the frontage to Rawson Place for drop-offs and pick-ups of guests and for deliveries and services to the SCYHA.

As noted above, the existing lay-by is used not only by coaches, shuttle buses, taxis and day tour buses as well as contractors and service-providers associated with the SCYHA and '790 on George', but also by tour operators and related tourism transport services operating generally within the area. It is a well-known and well-used drop-off, gathering and setting-off point for tours and the like.

The EIS states that "general traffic" would no longer operate in Rawson Place although, as set out in the above extracts, the EIS contains differing descriptions of the vehicles that will be able to access Rawson Place. The indicative plan of the interchange contained in the EIS shows that there will be no traffic access across the southern edge of Rawson Place outside the SCYHA.

These proposals are unacceptable to YHA.

In our view, there has been little apparent consideration given in the preparation of the Rawson Place/Rawson Lane proposals for the CSELR of the impact of the loss of such important existing infrastructure on operators such as the SCYHA and on the wider tourism industry operating in and around Central Station. Indeed, the combined effect of the proposals for Rawson Place and Rawson Lane is such that SCYHA is of the view that it could not continue to operate in this location if the proposals were to be implemented.

The CSELR proposals would have a significant adverse impact on YHA's current operations (and its guests), as well as those of other accommodation and related tourism operators which rely on the Rawson Place lay-by for access. The proposals will result in the loss of the main means of vehicular access to the SCYHA. They will therefore remove one of the primary attractions of the site for visitors and one of the main reasons, as referred to above, the site was originally selected by YHA. No alternative access point to the site would offer the convenience or proximity of the existing frontage to Rawson Place.

The recent *Investigation of Tourist Coach Parking in the CBD* (2012), prepared by Parsons Brinckerhoff for Roads and Maritime Services was prepared to address issues concerning coaches in the CBD. The report deals with both parking and set down/pick up and references three previous documents dated 1997, 2008 and 2009 prepared in response to unresolved coach issues. The 2008 paper lists a number of hotel and accommodation locations where problems for coach parking or passenger safety occur.

The Parsons Brinckerhoff report states:

*Clause 4.1.3 Re-distribution of short term coach parking spaces*

*.....there will always be a requirement for tourist coaches to pick up and drop off passengers at hotels and other accommodation within the CBD*

*Clause 4.1.4 Re-design of the Sydney Coach Terminal*

*The Sydney Coach terminal at Eddy Avenue/Pitt Street is used by long distance and interstate coaches. Whilst tourist coaches do not use the facility it is clearly used by tourists on scheduled coaches. The design of the current facility is poor, with congested parking facilities and passenger boarding areas open to the elements. The requirement for a Sydney Coach Terminal improvement scoping study was raised in the Sydney CBD Coach Discussion Paper and in the Sydney CBD Coach Strategy. The requirement to do so now is given added impetus by the potential extensions of light rail, which may require an extensive re-design of Eddy Avenue.*

By number of guests, the SCYHA is one of the largest accommodation facilities in Sydney. If the Rawson Place interchange proceeds as proposed in the EIS, then it will become another facility where problems for coach parking and passenger safety occur.

***Lack of Feasible Alternative Pick-up/Drop-off Points***

There appear to be no appropriate alternatives available to accommodate guest-related traffic to the SCYHA, and other such tourism-related traffic in surrounding streets, taking into account the proposals in the EIS and the related changes to the bus routes in the CBD. The EIS indicates that new bus stops will be located on the western side of Pitt Street both to the north and south of Rawson Place as well as on the northern side of Rawson Place and on the eastern side of George Street south of Rawson Place. As shown in the above

“Access Plan” these proposals leave virtually no space around the block in which SCYHA is located to accommodate the many vehicles needing to access it (and other nearby operators).

Further, the on-street parking “opportunities” identified in Table 5-2 above are not considered feasible or appropriate alternatives for SCYHA.

Other options raised by officers of Transport for NSW in more recent discussions are also not considered feasible. They will either clash with the locations of proposed bus stops or are too far removed from the SCYHA and will involve guests and other visitors walking for a distance of around 150-200m, as well as crossing surrounding streets, to access SCYHA often with, as noted above, heavy luggage. The footpaths surrounding the SCYHA will be more congested than is already the case with the addition of the proposed new bus stops and pedestrian flows to the proposed Rawson Place light rail interchange. In summary:

- West side of George St - too far from SCYHA, involves crossing George St as a major road albeit with less traffic than currently;
- East side of George St - too far from SCYHA, pedestrian route subject to congestion from commuters, not convenient for vehicles coming from the south (airport). An officer of Transport for NSW has suggested this bay could be brought closer to the Rawson Place intersection. This is only a marginal improvement, still well out of sight of SCYHA and this location would have to compete with public bus pick up/set down as is envisaged in the light rail interchange proposal. YHA’s management has held three meetings with officers of Transport for NSW and out of all those discussions no reasonable alternative to the present lay-by to meet the needs of YHA’s guests and other visitors using the present space has been forthcoming;
- Barlow Street - too far from SCYHA, pedestrian route will be subject to congestion from commuters to proposed light rail interchange, will involve crossing Rawson Place and the light rail interchange;
- West side of Pitt St - too far from SCYHA and pedestrian route subject to congestion from commuters; and
- East Side of Pitt St - congested and involves crossing Pitt St as a major road, not convenient for vehicles coming from the south (airport). This crossing has a poor pedestrian safety record.

Moreover, the EIS only identifies “opportunities” and does not appear to contain any firm proposals for alternative on-street parking locations. It is unacceptable to SCYHA that the resolution of such important details affecting the viability of its future operations are apparently to be left to later stages of the project. It is imperative for business operators such as SCYHA that such matters are addressed and resolved (if possible) as part of the current approval process.

### ***Rawson Place is an Inappropriate Location for a Transport Interchange***

It is understood that the choice of Rawson Place for the light rail interchange has been influenced by the desire to minimise street crossing by commuters transferring from bus to light rail for safety reasons. These same safety concerns must also apply to visitors to Sydney with luggage and who are very commonly new arrivals into Australia and whose numbers are expected to keep growing in the future. Unlike peak commuter activity, tourist-related activity in and around the SCYHA and in Rawson Place generally is

typically 7 days per week and 364 days per year. That is, whilst peak commuter demand needs to be accommodated there are also the needs of visitors to Sydney which are continuous. We have seen no evidence the CSELR project has taken these needs into account. This can be achieved by maintaining westward vehicle access to Rawson Place and the lay-by drop off/pick up.

It is therefore YHA's submission that it is essential that the lay-by and traffic access is maintained in Rawson Place and that, preferably, the proposed light rail interchange is relocated to Eddy Avenue/Central Station, as was originally proposed. As noted above, YHA was not consulted at any time about the relocation of the light rail interchange from Eddy Avenue to Rawson Place and, while it has been involved in more recent discussions with officers of Transport for NSW, no feasible solutions to its objections have been identified.

If the interchange could be accommodated in Rawson Place with the retention of vehicle access to the SCYHA and '790 on George' then most of YHA's objections would be met. YHA believes that, through reduction of the footpath on the north side of Rawson Place (no longer required) and the widening of Rawson Place on the SCYHA side (including cutting back the SCYHA awning to align with that of '790 on George'), this may be achieved.

It is submitted that Rawson Place is an inappropriate location for such an important transport interchange. Unlike Eddy Avenue, Rawson Place was not designed as such an interchange. SCYHA has observed that Rawson Place is often affected by strong winds created by the mass and length of the McKell building and is an unpleasant place to wait for transport in wet or windy weather. While SCYHA has been able to address these microclimatic issues in its building design, similar options for the transport interchange will be limited. As a result the interchange is likely to have very poor amenity when weather conditions are unfavourable and will result in a substandard experience for passengers and commuters, particularly those having to transfer from buses in surrounding streets.

It is also submitted that the proposed Rawson Place interchange has the potential to have an adverse impact on the heritage significance of Daking House (SCYHA) and Station House ('790 on George'). The details of the construction of the light rail interchange in Rawson Place are unknown at present and officers of Transport for NSW have advised YHA that the artist's impression entitled Rawson Place and Eddy Avenue cannot be relied upon as a representation of what will eventually be built. Nevertheless, it is considered that the shelter structure of the interchange will substantially interfere with views of the heritage streetscape and, in particular, views to and above the awning and barrel vault entry to SCYHA. If, as YHA expects, the design of the structure has to, if not initially, but eventually be more substantial to deal with the Rawson Place microclimatic problems described above then the impact on the streetscape will be greater.

In addition, Rawson Place falls approximately 4 metres from east to west and the light rail interchange platform can, YHA is advised, have a maximum gradient of only 2.5%. For this reason, the proposed platforms extend above the roadway in front of SCYHA and '790 on George' with the greatest height at the western end. The height of the platform necessitates ramps and railings for passenger safety and increases the impact of the interchange on the streetscape. For these reasons, as well as others outlined above, Rawson Place is not an appropriate location for a major interchange. It was never designed as such, whereas Eddy Avenue/Central Station was.

### ***Objections to the closure of Rawson Lane***

YHA also strongly objects to the proposal to close Rawson Lane to through traffic by closing it at its Rawson Place end. As referred to above, SCYHA relies on Rawson Place for the majority of its servicing and deliveries to the site, as do other premises fronting George Street and Pitt Street to the north of Christ Church St Laurence Anglican Church. This block contains numerous small shops, offices and food outlets. In particular, it is unclear how garbage trucks will be able to service these premises as they are not able to turn around in the narrow laneway. SCYHA also relies on Rawson Place to provide access to its basement car park which, as noted above, is used to capacity on most days.

The EIS itself notes that access to Rawson Place for larger vehicles (standard 8.8 metre vehicles) would not be possible and that *further development of access to this location would be undertaken during detailed design*. As set out above, it is unacceptable to SCYHA that such important details affecting its future operations are not resolved as part of the current approval process.

In addition, under the EIS proposals, there would need to be many more vehicles (which presently use the lay-by in Rawson Place) using Rawson Lane to access the SCYHA (eg. contractors and service providers). This increase could give rise to additional congestion and safety issues in the laneway, given its narrow width coupled with the proposal to close it to through traffic.

Accordingly, the proposal to close Rawson Lane at Rawson Place will have a significant adverse effect on the operations of the SCYHA and other surrounding premises by limiting its use to only those vehicles able to turn in the Lane and by increasing congestion and, potentially safety concerns, in the Lane. The impact of the proposal on garbage servicing to SCYHA is particularly problematic as there are no alternatives available to SCYHA.

On this basis, it is YHA's submission that it is essential that access from Rawson Place to Rawson Lane be retained.

### **Summary**

In summary, therefore, while YHA supports the CSELR proposal in principle, it is essential that the following changes are made to ensure that the impact of the proposal on the operations Sydney Central YHA (and surrounding businesses and tour operators) are minimised to enable it to continue operating in this location:

- the maintenance of traffic access and the lay-by facility in Rawson Place adjacent to SCYHA to provide appropriate facility for the drop-off and pick-up of guests and other activities associated with the operation of SCYHA;
- the relocation of the proposed light rail interchange to Eddy Avenue/Central Station, as was originally proposed; and
- the maintenance of through traffic in Rawson Lane.

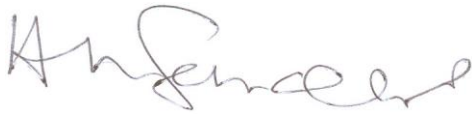
Our client urges that Transport for NSW, as the proponent, take a long term view and develop a better solution than the Rawson Place proposals. This is to provide a properly developed mass transit interchange which is enclosed and protected from the weather as part of a full redevelopment of the Eddy Avenue precinct. A major part of such a facility may be underground. In addition, planning for the extension of the light rail further down

George Street should be expedited so that a more appropriate alternative location (such as Railway Square) for the bus/light rail interchange may be found.

We request, on YHA's behalf, that the objections set out in this submission are taken into consideration by the Minister for Planning and Infrastructure, as the consent authority, and that the above amendments to the proposal are sought to address these matters.

Should you wish to discuss this matter, please contact the writer.

Yours Faithfully,  
DESIGN COLLABORATIVE PTY LTD

A handwritten signature in dark ink, appearing to read 'H M Sanders', written in a cursive style.

H M Sanders  
Director