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CONSULTING PLANNERS

16 December 2013 Our ref: DHB/12-052

Director General
Department of Planning and Infrastructure
22 Bridge Street
Sydney NSW 2000

Dear Sir,

re: Submission to Exhibition of the Environmental Impact Statement for CBD and South East Light Rail Project
Property: 420 George St Sydney (Commercial Centre) & MidCity Centre, Sydney (Retail Centre)

We write in relation to the exhibited CBD and South East Light Rail Project Environmental Impact Statement (the EIS) on behalf of Fortius Funds Management/Lend Lease, the building owners and both Jones Lang La Salle, the manager of 420 George Street, and Lend Lease Property Management Australia, manager of MidCity Centre.

The owners and managers support the proposed CSELR. However, we request that the following matters be taken into consideration in the further design of the CSELR.

Confirmation of George Street Access from King Street and to Market Street

Changes to vehicle access to George Street (including taxis, buses and privately owned vehicles) will reduce the ease and attractiveness for vehicular access to the site. The EIS indicates that right turns from King Street to George Street for vehicles heading east and that right turns from George Street into Market heading south will be retained.

We request that this be confirmed in the preferred project report prepared in response to submissions.

Access to loading docks/servicing areas

There will be constraints to the frequency and ease of access to the delivery dock and car parking at 420 George Street during construction and operation of the CSELR. Time delays and additional travel times along George Street will also negatively impact on the site.

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.

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We advise that the 420 George Street (commercial building) and MidCity Centre (retail) opened in August 2010 (MidCity Centre opened earlier in June 2010) and incorporates off street parking over three basement levels containing 66 tenant car parking spaces (which includes 2 disabled spaces) and 31 spaces for delivery and service vehicles, of which 4 spaces being 9.85 metres in length and 3 spaces being 6.9 metres in length, to allow the large vehicles to park in the loading dock, as part of day to day operations. There is also parking for 12 motorcycles and approximately 145 bicycles and associated end of journey facilities.

Vehicle and loading areas at 420 George Street service the adjoining Strand Arcade and the driveway and vehicle ramp is available to Dymocks for egress. The loading dock and parking areas are accessed from George Street via an access laneway approximately 60 metres long. This laneway serves as egress from the Dymocks Building loading dock.

The access driveway and loading dock operate in accordance with an operational plan implemented by building management.

It is noted that the EIS contains data on loading dock usage dated 2010. This data shows 77 vehicles in and 104 vehicles out between 7am and 7pm, 67% of which are cars/utes and vans and 33% of which are small to large rigid trucks.

More recent survey data by the City of Sydney shows that in 2013, there were 142 vehicles in and 294 vehicles out between 7am and 7pm of which 10% were small to large rigid trucks. This is a significant increase on the 2010 figures and suggests a more typical mode of operation associated with a tenanted building. It is important to note the large rigid truck movements occur on a daily basis which includes large garbage trucks and retail delivery vehicles. The 2013 counts would not include office or shop fit out traffic that occurs on a regular basis as tenants refurbish or change. There should be no adverse impact in respect of the largest vehicles that can currently access the building or future access requirements, as the Property will go through various cycles of occupancy levels and changes that most likely require larger vehicles to transport certain building materials and equipment

Transport for NSW is requested to take the 2013 traffic figures into account in the detailed design of the light rail and to ensure that arrangements are made that are safe and efficient for vehicles to continue to access the site.

The loading dock has been designed to meet Sydney City Council requirements and is important to the operation of the building.

The building is accessed by motor cycle couriers and bicycle couriers and a large number of occupants commute by bicycle.

It is of critical importance that existing lawful access arrangements to 420 George Street and MidCity Centre for on-site car parking, loading vehicles, building construction and repair vehicles, couriers and bicycles are maintained and that there are no further restrictions in terms of hours of access for vehicles using the basement car park and for service vehicles, courier vehicles and delivery vehicles. It is essential to recognise that use of the existing access needs to be maintained (24/7) with no diminution in operational flexibility.

Provision of Safe and Efficient Access

Based on the above traffic levels from Council's recent surveys, it is important that the need for safe and efficient access is appreciated and accommodated in the design of the works. This should include:

- The need for signalised intersections at King and Market Streets that clearly identify priority turns for vehicles access the site and other existing driveways.
- The need for signage and controls to restrict other vehicles from the pedestrianized sections of George Street.
- The need for a clearly defined path of travel for vehicles such that there would be general pedestrian awareness of this space. This may include activated signs or lights when the path of travel is in use and possibly structures such as bollards to delineate the path of travel. This is particularly so for trucks and vans that may have limited vision at the back of the vehicle.
- Turning paths connecting with the access lane to the basement and loading dock need to be clearly delineated and incorporate means of restricting pedestrian movement for vehicle arrivals and departures.

In order the ensure efficient access to the site by cars service and delivery vehicles, bicycles and motor cycles as discussed above it is important that vehicles can move through the pedestrian area in a defined area. In this regard it is noted that light rail vehicles would travel through the pedestrianised area at low speeds, limited to a maximum of approximately 20 kilometres per hour and that the CSELR tracks would be highlighted by either a different material colour, finish, texture or size of paving, so that pedestrians can visually and texturally distinguish between the pedestrian zone and the CSELR track zone. **It is considered important that vehicles accessing the site and other existing driveways in the section of George Street between King and Market Streets can do so at the same speed as the light rail and within an area also delineated by either a different material colour, finish, texture or size of paving, so that pedestrians can visually and texturally distinguish between the pedestrian zone and the access vehicle travel zone.**

We advise that the building owners and managers remain committed to maintaining current management of laneway and dock access. These include, but are not limited to:

- A stop line 12m down the laneway from George Street. This allows clear room for trucks and other vehicles to perform an entry manoeuvre into the site.
- Warning buzzer and flashing lights to alert pedestrians to exiting vehicles.
- Left in-left out vehicle access enforced through signage.
- CCTV surveillance of the access lane and connection to the Dock Master.
- 2 traffic controllers positioned at the George Street frontage at the top of the ramp between 6am and 6pm. – There is a small traffic controller booth that is set into the wall near to the top of the ramp that includes CCTV monitors related to Access and Traffic flow in and out of the Property. Traffic Controllers perform the following functions, but not limited to these functions:

  - Control access of vehicles entering and exiting the laneway, managing pedestrian flow through the use of moveable barriers on the George Street footpath;
  - Are in constant radio contact with the Dock Master;
  - Operate manual retractable fencing on either side of the laneway to stop pedestrians when vehicles are exiting;
  - Operate manual override for the warning buzzer only when vehicles are entering the site to reduce pedestrian confusion;
  - Keep laneway clear of parked vehicles;
  - Wear high visibility safety uniform;
  - Control access for Emergency vehicles.
- A Dock Master is based in the loading dock area, which is located Basement Level 2, and operates the Dock between 6am and 6pm, from the dock master's office. The Dock Master:
  - Controls the access of trucks and other vehicles entering and leaving the loading dock and the car park (those exiting the Dymocks Building);
  - Is in constant radio contact with access / traffic controllers, warning them when a vehicles leave the dock area;
  - Manages contractor security and access into both the Retail & Commercial centres of the Property.
- Entry to the site is by a left turn only movement from George Street.
- Vehicles entering the site have priority over vehicles exiting the site, which minimises the likelihood of vehicles queuing on George Street to access the site.
- Trucks entering the site are directed by the traffic controller(s) to proceed to the loading dock level and report to the Dock Master. Cars and motorcycles would be directed to proceed to the basement car parking levels; bicycles would be directed to the bike racks on basement level 2.
- No loading or unloading is to take place on the ramp.
- Vehicles exiting the site will proceed up the ramp to the stop line position 12m from George Street. Exiting vehicles are to wait until directed to exit by the traffic controllers during the hours 6am to 6pm, otherwise vehicles may exit after stopping at the stop line and negotiating the gaps in pedestrian flow to exit.
- The traffic controllers, having been notified of the exiting vehicle by the Dock Master, uses the manual retractable fences to stop pedestrians crossing the laneway and direct the vehicle to exit.
- In the case of an entering vehicle arriving while the exiting vehicle is at the stop sign, the traffic controllers will hold the exiting vehicle and allow the entering vehicle access to the site.
- The flashing lights and buzzer are activated by exiting vehicles to warn pedestrians.

The project will result in significant increase in pedestrian traffic along George Street and is likely to require changes to these measures and possibly additional measures to manage pedestrian and vehicle interface.

We ask that the proponent and any appointed contractors work with the owners and the managers to develop a management plan which will be risk adverse, incident free and the best interest of the Property. **The project should make provision for and fund any required changes to building access management measures, inclusive of any consultant specific advised related to current Traffic Management Plan.**

Furthermore the project should clearly identify and document means of preventing entry to this section of George Street by unauthorised vehicles including vehicles that currently travel along George Street. It is understood that it is intended that vehicles accessing George Street mid-block buildings are to arrive and depart via the nearest cross street. It is requested that measures are incorporated into the proposal to encourage and enforce this requirement.

Potential Changes in Street Levels

It is noted that there do not appear to be any cross sections of the George Street pedestrian zone between King and Market Street so it is not possible to comment on specific access arrangements to the site. However the EIS refers to potential changes in levels of the existing streets in the vicinity of stops and also elsewhere to create a pedestrian zone. This may result in raising the street level to be compatible with the footpath level.

If this is the case, consideration needs to be given in the detailed design to the current awnings over the street and the impacts that changing levels might have on access clearances below and around awning structures and existing driveway grades to ensure access is not restricted and the current height clearance is not reduced or affected in any way. Any associated works / costs to modify the awning including associated signage and traffic electronic controls are not to disadvantage 420 George Street and are to be borne by the project not the owners, as a direct impact /result of the CSELR.

Maintenance of Access For Construction Activity at the Site

It is important to ensure that the light rail project does not limit opportunities for construction access to the site, including the construction of hoardings and parking for delivery vehicles and cranes for works to the building. Works such as alterations and additions, façade repairs, painting, new plant and equipment and tenant fit-outs occur on a regular basis and need to be accommodated in any project design. Although the building was completed in 2010, there will be an ongoing need for access for repairs and upgrades. The design of the light rail must accommodate the potential for construction access and erection of hoardings and this should be an important design criterion for the project.

Our review of the EIS indicates that this matter has not been considered in the concept design of the project to date. **The applicant should be requested to include these details in the preferred project report.**

Request Consideration of an Additional Stop

The distance between the proposed Wynyard stop and QVB stop is approximately 550 metres. This is the longest distance between any two stops in the city centre and is also within the pedestrian only part of George Street. Pedestrian flows along George Street between King and Market are higher than in any other section of George Street (Figure 2-12 of Transport Operations Report), particularly at lunch time. Proximity of this section to Martin Place and Pitt Street Mall adds further to the pedestrian traffic and activity in this area.

In view of the potential demand in the local area, as evidenced by the amount of pedestrian traffic particularly at lunch time and the extent and nature of retail and commercial development in the area (with Pitt Street Mall considered to be at the heart of the retail precinct), further consideration should be given to an additional station between King Street and QVB in the vicinity of 420 George Street & MidCity Centre. It is anticipated that such a stop would be well utilised, particularly by intra city trips.

Impacts on Building Operations and Services

Concern is raised about impacts on the quiet enjoyment of the building during construction.

It is of critical importance that all utility services are maintained 24 hours a day and 7 days a week in view of the nature of occupants which include global data centres reliant on continuous availability of services.

It is equally important that there are controls over noise and vibration to ensure that there is no unreasonable disruption to commercial and business operations, related to both of the retail and commercial centres.

In this regard it is noted that construction is proposed on the section of George Street between Market and King Streets over a 5 month period with up to 3 shifts each day.

The building owners and managers wish to be consulted during the construction period and be party to working groups established to work through issues during the construction program.

The Department is requested to include a condition of approval to require the proponent and the appointed contractor to prepare a detailed Construction Noise and Vibration Management Plan in consultation with the owners and managers of 420 George Street and MidCity Centre that responds to, and accommodates, the operational requirements of the building. There should be a requirement that this plan be prepared in consultation with the building owners, managers and occupiers.

Construction Traffic Management

The Department is requested to include a condition of approval to require the proponent and the appointed contractor to **prepare a detailed Construction Traffic Management Plan in consultation with the owners and managers of 420 George Street / MidCity Centre that responds to, and accommodates the access requirements for the Property**.

No Smoking in Pedestrian Zone

Transport for NSW and the Department of Planning are requested to work with the City of Sydney Council to ensure that the pedestrian zone is a smoke free zone. Consideration should be given to this being a condition of approval.

Construction Reporting

In the event that approval is recommended, the Department is requested to ensure that there are conditions of approval that include matters such as the following:

- The preparation of dilapidation reports of the existing building prior to construction commencing;
- The provision of construction traffic management and construction management plans to building managers so that these can be distributed to tenants and incorporated into building specific risk management planning;
- The preparation of emergency response plans for the construction period including access for emergency vehicles, integration with existing building evacuation planning, identification of building evacuation meeting points and paths of travel;
- The provision of regular (weekly) newsletters advising of construction activities during the week and changes in access and accessibility, services diversions, emergency planning, planned disruption to services and means of maintaining services to the existing building and hours and duration of works. This information should be circulated to building manager and tenants.

Summary of Main Points

The key matters raised in this submission are:

- **Access to George Street**: The preferred project report should confirm that right turns from King Street to George Street for vehicles heading east and that right turns from George Street into Market heading south will be retained.
- **Vehicular Access to Site**: It is of critical importance that existing lawful access arrangements to 420 George Street and MidCity Centre for on-site car parking, loading vehicles, building construction and repair vehicles, couriers and bicycles are maintained and that there are no further restrictions in terms of hours of access for vehicles using the basement car park and for service vehicles, courier vehicles and delivery vehicles. It is essential to recognise that use of the existing access needs to be maintained (24/7) with no diminution in operational flexibility
- **Efficient and Safe Vehicular Access to Site**: It is considered important that vehicles accessing the site and other existing driveways in the section of George Street between King and Market Streets can do so at the same speed as the light rail and within an area also delineated by either a different material colour, finish, texture or size of paving, so that pedestrians can visually and texturally distinguish between the pedestrian zone and the access vehicle travel zone.
- **Effective Communication**: We request that the proponent and any appointed contractors work with the owners and the managers to develop a management plan which will be risk adverse, incident free and the best interest of 420 George Street.

The project should make provision for and fund any required changes to building access management measures, inclusive of any consultant specific advised related to current Traffic Management Plan.

- **Controlled Access to George Street**: The preferred project report should clearly identify and document means of preventing entry to this section of George Street by unauthorised vehicles including vehicles that currently travel along George Street. It is understood that it is intended that vehicles accessing George Street mid-block buildings are to arrive and depart via the nearest cross street. It is requested that measures are incorporated into the proposal to encourage and enforce this requirement.
- **Changes is Street Finished Levels**: Consideration needs to be given in the detailed design to the current awnings over the street to 420 George Street and the impacts that changing road or footpath levels might have on access clearances below and around awning structures and existing driveway grades to ensure access is not restricted and the current height clearance is not reduced or affected in any way. Any associated works / costs to modify the awning including associated signage and traffic electronic controls are not to disadvantage 420 George Street and are to be borne by the project not the owners, as a direct impact /result of the CSELR.
- **Future Construction Vehicle and Construction Access to Site**: It is important to ensure that the light rail project does not limit opportunities for construction access to the site, including the construction of hoardings and parking for delivery vehicles and cranes for works to the building such as alterations and additions, façade repairs, painting, new plant and equipment and tenant fit-outs. The design of the light rail must accommodate construction access and erection of hoardings and this should be an important design criterion for the project. The applicant should be requested to include these details in the preferred project report.
- **Request for Additional Stop**: In view of the potential demand in the local area, as evidenced by the amount of pedestrian traffic particularly at lunch time and the extent and nature of retail and commercial development in the area (with Pitt Street Mall considered to be at the heart of the retail precinct), further consideration should be given to an additional station between Wynyard and QVB in the vicinity of 420 George Street/King Street. It is anticipated that such a stop would be well utilised, particularly by intra city trips.
- **Continuity of Services**: It is of critical importance that all utility services are maintained 24 hours a day and 7 days a week in view of the nature of occupants which include global data centres reliant on continuous availability of services. It is equally important that there are controls over noise and vibration to ensure that there is no unreasonable disruption to commercial and business operations, related to both of the retail and commercial centres.
- **Consultation:** The building owners and managers wish to be consulted during the construction period and be party to working groups established to work through issues during the construction program.
- **Construction Noise Management**: The Department is requested to include a condition of approval to require the proponent and the appointed contractor to prepare a detailed Construction Noise and Vibration Management Plan in

consultation with the owners and managers of 420 George Street and MidCity Centre that responds to, and accommodates, the operational requirements of the building. There should be a requirement that this plan be prepared in consultation with the building owners, managers and occupiers.

- **Construction Traffic Management**: The Department is requested to include a condition of approval to require the proponent and the appointed contractor to prepare a detailed Construction Traffic Management Plan in consultation with the owners and managers of 420 George Street / Midcity Centre that responds to, and accommodates the access requirements for the property.
- *No Smoking in Pedestrian Zone*: Transport for NSW and the Department of Planning are requested to work with the City of Sydney Council to ensure that the pedestrian zone is a smoke free zone. Consideration should be given to this being a condition of approval.
- **Construction Reporting**: In the event that approval is recommended, the Department is requested to ensure that there are conditions of approval that include matters such as the following:
    - The preparation of dilapidation reports: of the existing building prior to construction commencing;
    - The preparation of emergency response plans;
    - The provision of regular (weekly) newsletters advising of construction activities during the week and changes in access and accessibility, services diversions, emergency planning, planned disruption to services and means of maintaining services to the existing building and hours and duration of works.

We thank you for the opportunity to make this submission and look forward to on-going discussions in relation to the CSELR. The building owners and managers recognise the importance of this project to the State and the City of Sydney and wish to be closely involved in its design, construction and operational attributes.

Should any clarification of the above be required, please do not hesitate to contact this office.

Yours faithfully,
BBC Consulting Planners

Dan Brindle
Director