

16 December 2013

NSW Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Sir/Madam

Re: Sydney CBD and South East Light Rail Proposal (SSI 6042)

This letter is written on behalf of Investa Asset Management (**Investa**). It considers the potential impacts of the Sydney CBD and South East Light Rail proposal (**CSELR**) on the existing commercial/retail building at 400 George Street, Sydney which is owned by Investa. Prepared in conjunction with Eastview Commercial Pty Ltd (**EVC**) and ML Traffic Engineers, the submission describes the existing improvements at 400 George Street, assesses the potential impacts of the CSELR and suggests measures that would ameliorate any negative impacts.

Where relevant, the submission also considers the *Sydney City Centre Access Strategy*, September 2013 (the **Access Strategy**).

1. Overview of 400 George Street

With frontage to George and King Streets (refer **Figure 1**), this site is occupied by a commercial/retail building. The building has a nett lettable area of 51,000m² and accommodates Grade A office space. It is estimated that around 5800 employees and visitors to the building. A summary of the site's parking, access and loading arrangements follows:

- (a) 94 tenant car parking spaces
- (b) King Street one-way only towards Elizabeth Street
- (c) Car park entrance and exit ramps to basement level on King Street
- (d) Major disabled and pedestrian access in the middle of King Street between George and Pitt Streets
- (e) Main entrance to tower lobby from George Street and from the intersection of George and King Streets
- (f) Main entrance to retail outlets along King and Pitt Streets
- (g) On street parking is generally not permitted on George Street adjacent the site
- (h) There is a loading zone located on the south side of King Street adjacent the site
- (i) A signalised pedestrian crossing is located midway on King Street between George Street and Pitt Street
- (j) Major shopping arcade connection from King St to Pitt Street

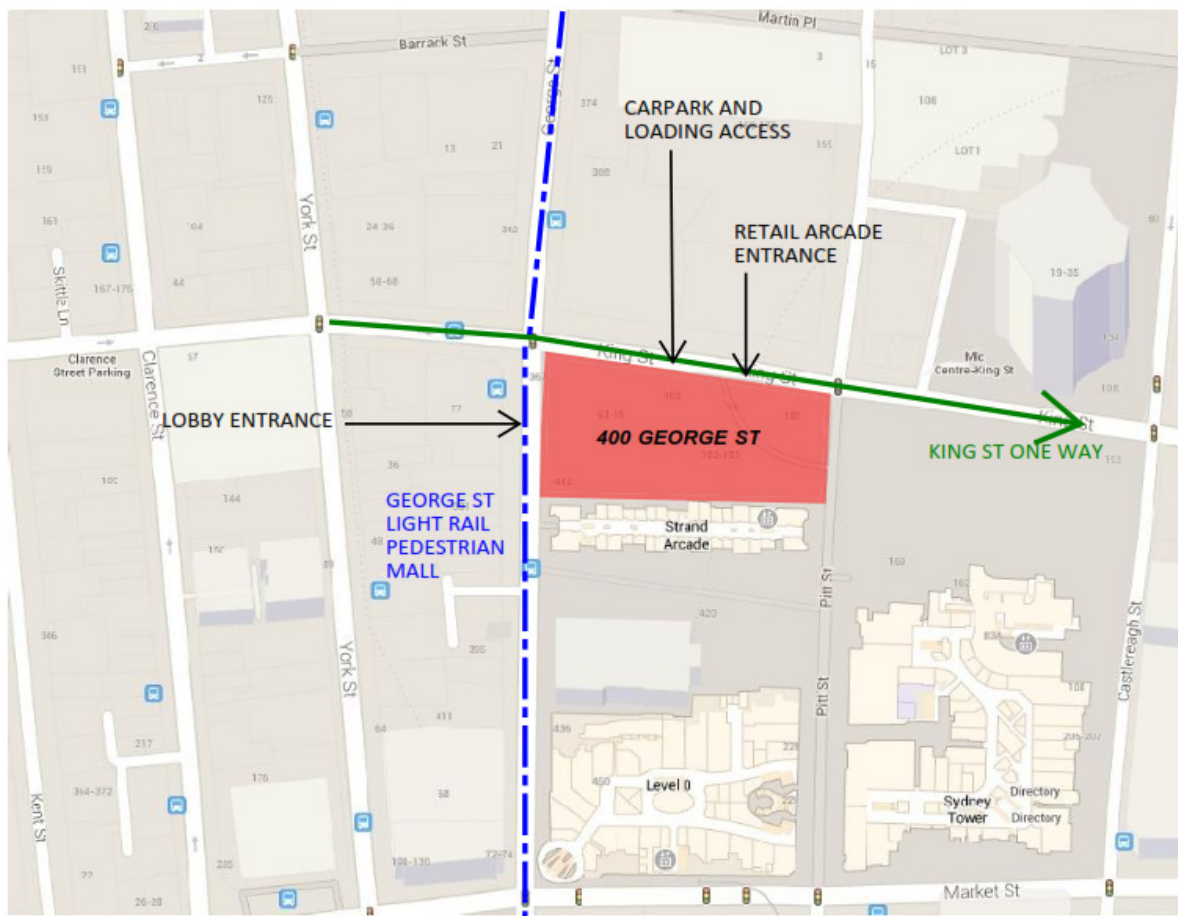


Figure 1 - Location plan

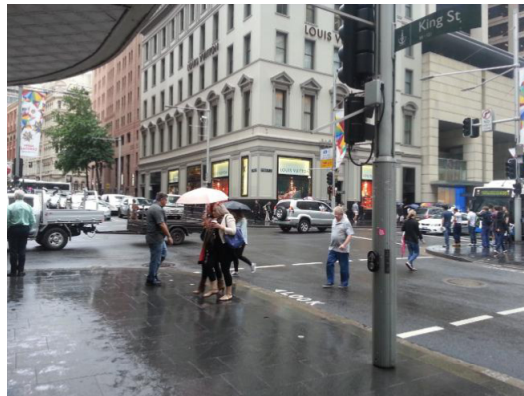
2. Existing traffic conditions at 400 George Street

Currently there is queuing on King Street adjoining the site as a consequence of:

- (a) Pedestrian crossing between Pitt St and George St being activated to allow pedestrians to cross King Street
- (b) Congestion at the intersection of King Street with Pitt Street, during both AM and PM peaks
- (c) Congestion at the intersection of King Street with George St Street, during both AM and PM peaks
- (d) Congestion at the signalised intersection of King Street with Castlereagh Street in the PM peak
- (e) There are existing flooding issues associated with stormwater, with ponding occurring during heavy rainfall at the junction between King Street and George Street



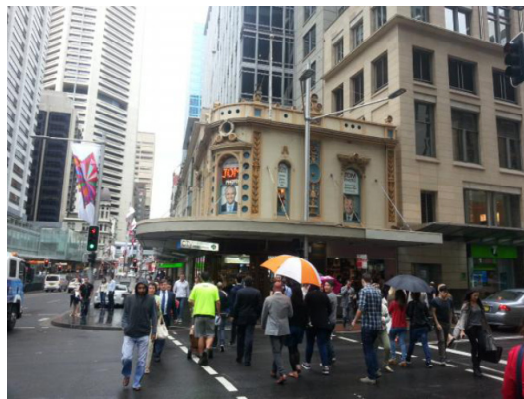
1. Lobby entrance on George Street



2. Intersection to George/King Streets from Pitt Street



3. Entrance to parking and loading bay on King Street



4. Corner of George and King looking towards 400 George Street

Figure 2 – Photographs of the site

3. Potential impacts of the CSELR

ML Traffic Engineers has considered the potential impacts of the CSELR on 400 George Street and notes that the introduction pedestrianised areas within George Street and generally single traffic lane traffic movements in each direction may impact on the site. This traffic lane is intended only for local traffic movement and the importance of George Street as a route for through traffic is to be reduced.

The consequence of these changes is expected to be a significant reduction of traffic on George Street generally, with extensive traffic redistribution across the wider road network. The following CSELR changes are noted:

- (a) Relocation of buses from George Street mainly to the Elizabeth Street/Castlereagh Street
- (b) Removal of loading zones from George Street and introduction of clearway conditions
- (c) The provision of additional loading zones in King Street (and other streets) is under consideration
- (d) George Street will no longer be promoted as a bicycle route, with cycleway relocations to Pitt Street and Castlereagh Street
- (e) Raising the average ground level in the vicinity of King Street within the proposed George Street pedestrian zone as a result of existing flooding issues in the area
- (f) During construction, travel times during the afternoon peak, will increase along the King Street corridor by approximately 80 seconds

4. Recommended measures to ameliorate negative impacts for 400 George Street

Investa formally requests ongoing consultation with the CSELR proponent and the City of Sydney Council (**Council**) in relation to the progressive assessment of both the construction and operational impacts arising from the project. This would include changes to traffic management, bus routes and parking. In particular, the implications of relocating any bus activity onto King Street and raising of the street alignment on King Street are a matter of potential concern, given the existing difficulties with the site's access and flooding conditions.

ML Traffic Engineers recommends the following traffic management measures to ameliorate the negative impacts described above:

- (a) The signal timings at the intersection of King Street with Pitt Street and King Street with Castlereagh Street should be reviewed, to give more time to traffic exiting King Street.
- (b) The signal timings at the intersection of King Street and Elizabeth Street should be reviewed, to give more time to traffic exiting King Street.
- (c) Consideration should be given to the relocation of loading zones that currently exist on George Street to King Street.
- (d) Consideration should be given to a potential taxi drop off/pick up cutaway on King Street near the pedestrianized section of Pitt Street.
- (e) With capacity limitations along George Street, there will be a high demand for through traffic infiltration along King Street as a bypass route. The Access Strategy has identified King Street to be subject to future pedestrian access improvements. These measures have not yet been identified, however, any measures proposed need to be investigated and implemented to preserve the amenity of this route by discouraging through traffic infiltration. This could include turn restrictions, traffic calming measures, pedestrianisation measures and revised signal timings. Investa requests that it be consulted in the preparation of any such options/initiatives.
- (f) The building is accessed from George Street and from the intersection of George and King Streets, with the main entrance to the retail outlets along King and Pitt Streets. Investa requests that it be consulted be in the preparation of any measures to adjust the street alignment as a result of the proposed George Street pedestrian zone, which has the potential to exacerbate existing flooding issues in this area.
- (g) Consideration should be given to the major retail zones and arcade access when any future changes are made to pedestrian movements and amenity of King Street.

The CSELR raises issues that have not yet been addressed in detail and Investa should be fully consulted during the detailed design phase. In the meantime, the matters raised above are identified for specific consideration and we note that some of these may be able to be progressed independently by Council's Traffic Committee.

Yours faithfully



Kyeema Doyle
Senior Planner

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NSW Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Sir/Madam

Re: Sydney CBD and South East Light Rail Proposal (SSI 6042)

This letter is written on behalf of Investa Asset Management (**Investa**). It considers the potential impacts of the Sydney CBD and South East Light Rail proposal (**CSELR**) on the existing commercial/retail building at 55 Market Street, Sydney which is owned by Investa. Prepared in conjunction with Eastview Commercial Pty Ltd (**EVC**) and ML Traffic Engineers, the submission describes the existing improvements at 55 Market Street, assesses the potential impacts of the CSELR and suggests measures that would ameliorate any negative impacts.

Where relevant, the submission also considers the *Sydney City Centre Access Strategy*, September 2013 (the **Access Strategy**).

1. Overview of 55 Market Street

With frontage to Market and Pitt Streets (refer **Figure 1**), this site is occupied by a commercial/retail building. The building has a nett lettable area of 22,983m² and accommodates Grade B office space. It is estimated that around 3,200 employees and visitors access the building. A summary of the site's parking, access and loading arrangements follows:

- (a) 24 tenant car parking spaces
- (b) Market Street one-way only towards George Street
- (c) Pitt Street one-way only, left turn onto Market Street only
- (d) Service and deliveries entry/exit ramp to basement level on Market Street
- (e) Main entrance lobby off Market Street
- (f) Main entrance to retail outlets off Pitt Street and Market Street
- (g) Taxi rank located directly adjacent the site on the opposite side of Market Street (front of Myer Centre and Swissotel)
- (h) Retail banking entrance (St George) on the corner of Market and Pitt Street.

2. Existing traffic conditions at 55 Market Street

Currently there is regular queuing on Market Street at the signalised intersection of George Street with Market Street with queues extending up to Elizabeth Street in weekday AM and PM peak periods.

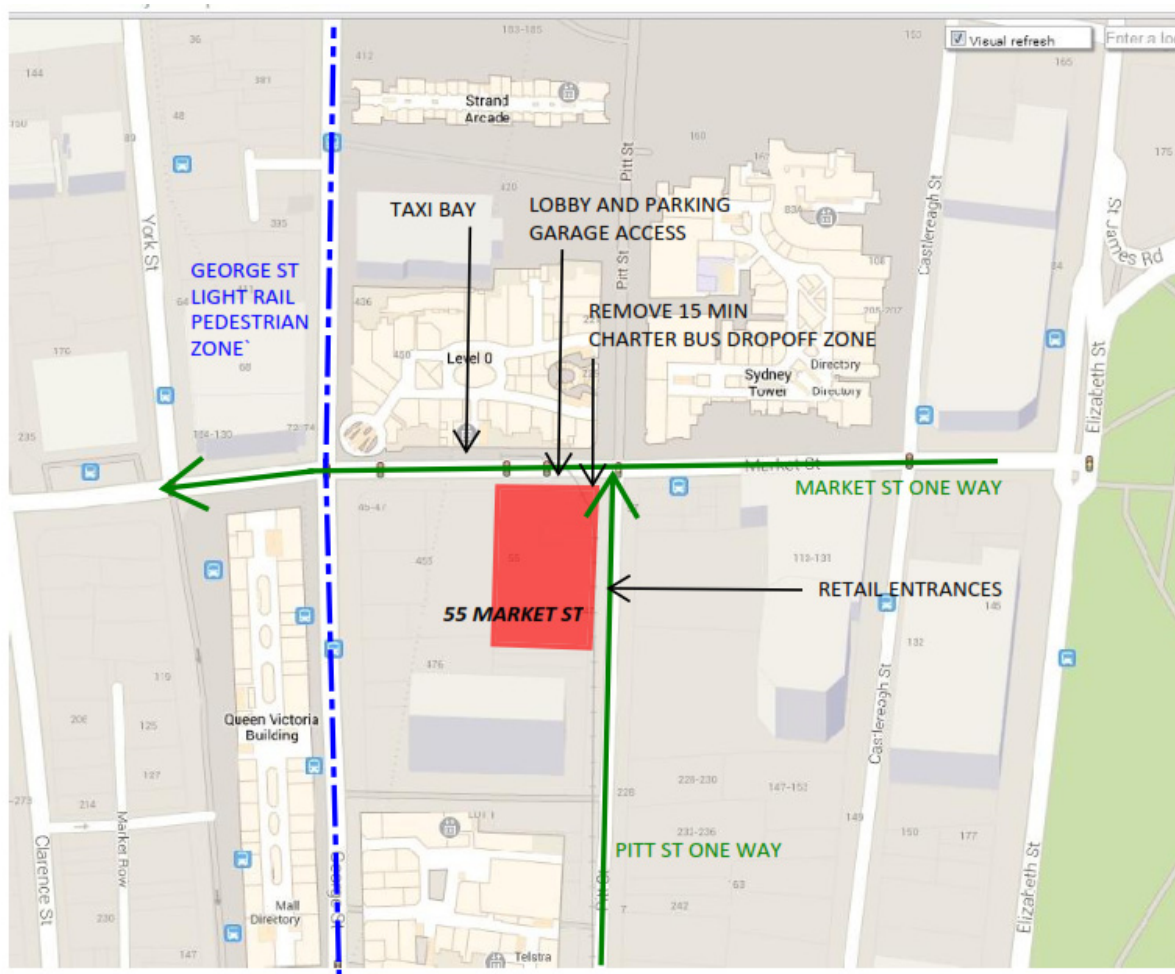


Figure 1 - Location plan



1. Service and deliveries entrance off Market Street



2. Intersection of Market and Pitt Street

Figure 2 – Photographs of the site

3. Potential impacts of the CSELR

ML Traffic Engineers has considered the potential impacts of the CSELR on 55 Market Street and notes that the introduction of pedestrianised areas within George Street and generally single traffic lane traffic movements in each direction may affect the site. This traffic lane is intended only for local traffic movement and the importance of George Street as a route for through traffic is to be reduced.

The consequence of these changes is expected to be a significant reduction of traffic on George Street generally, with extensive traffic redistribution across the wider road network. The following changes of the CSELR are noted:

- (a) Removal of loading zones from George Street and introduction of clearway conditions
- (b) George Street will no longer be promoted as a bicycle route, with cycleway relocations to Pitt Street and Castlereagh Street
- (c) The Queen Victoria Building (QVB) light rail stop will be located within the George Street pedestrian zone adjacent to the northern entrance of the QVD on Market Street (approximately 70m from the site)
- (d) No buses will travel along George Street between Rawson Place and Hunter Street and out of service or dead running buses will be allowed to cross George Street at Market Street
- (e) The morning peak period during construction will impact on the performance of the intersections in the mid-city, especially along Park Street, Market Street, College Street and Hunter Street
- (f) Under the Access Strategy, Market Street between George and Elizabeth Streets will be subject to future pedestrian access improvements (it is not clear at this stage what the improvements could be)
- (g) Currently there is a taxi rank on the north side of Market Street and according to the Access Strategy, a proposed new taxi rank may be implemented (subject to further investigation)
- (h) Currently there is a 15 min charter bus drop off zone in front of main lobby entrance to 55 Market Street, which causes significant pedestrian congestion, and exacerbates traffic congestion on Market Street. The 15-minute rules are currently not adhered to or policed accordingly.

4. Recommended measures to ameliorate negative impacts for 55 Market Street

Investa formally requests ongoing consultation with the CSELR and the City of Sydney Council (**Council**) in relation to the progressive assessment of both the construction and operational impacts arising from the project. This would include changes to traffic management, bus routes and parking. In particular, the implications of relocating any bus or taxi activity onto Market Street are a matter of potential concern, given the existing difficulties with the site's access.

ML Traffic Engineers recommends the following traffic management measures to ameliorate the negative impacts described above:

- (a) Consideration should be given to locating any taxi drop-off/pick-up zones on to Pitt Street, south of Market Street where there is already cut away parking
- (b) With capacity limitations along George Street, there will be a high demand for through traffic infiltration along Market Street as a bypass route. The Access Strategy has identified Market Street to be subject to future pedestrian access improvements. These measures have not yet been identified, however, any measures proposed need to be investigated and implemented to preserve the amenity of this route by discouraging through traffic infiltration. This could include turn restrictions, traffic calming measures, pedestrianisation measures and revised signal timings. Investa should be consulted in the preparation of any such options/initiatives.
- (c) The existing 15 minute charter bus drop off zone on Market Street should be removed and replaced with a 24 hour clear zone

- (d) The entire street frontage to 55 Market St to be considered as a 24 hour clear zone
- (e) Any changes to loading zones on Pitt St to be considered.

The proposed CSELR raises issues that have not yet been addressed in detail and Investa should be fully consulted during the detailed design phase. In the meantime, the matters raised above are identified for specific consideration and we note that some of these may be able to be progressed independently by Council's Traffic Committee.

Yours faithfully



Kyeema Doyle
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