

Friday, 6 February 2015

The Hon. Prudence Goward
Minister for Planning
Department of Planning and Infrastructure
23-33 Bridge Street
SYDNEY, NSW 2000

Attn: Andrew Hatcher

The Hon. Prudence Goward,

RE: Submission – Barangaroo Ferry Hub / Barangaroo Ferry Terminal (SSL- 6727)

1. Introduction

This submission is prepared on behalf of Brookfield Commercial Operations (Brookfield), as the managing agent on behalf of Brookfield, the owners of King Street Retail, 1 Shelley Street, 10 Shelley Street, and 12 Shelley Street, Sydney. Brookfield also represents its 30% ownership interest in Cockle Bay Wharf.

As a key stakeholder in the Sydney CBD and Darling Harbour/King Street Wharf precincts particularly, Brookfield welcomes the opportunity to comment on the public exhibition of the Barangaroo Ferry Hub / Barangaroo Ferry Terminal project.

This submission provides the following:

- An outline of concerns regarding the proposed removal of public ferry services and public transport infrastructure at the King Street Ferry Wharf.
- An outline of concerns regarding the proposed Barangaroo Ferry Hub.
- A summary of recommendations that Brookfield would seek to see addressed as part of the planning process.

We understand that the construction of the Barangaroo precinct will necessitate the improvement of public transport to the precinct and the Western CBD. The construction of additional public transport is supported within the precinct, so long as it is not to the detriment of access to Darling Harbour/King Street Wharf. Further, any future construction of ferry wharves at Barangaroo should address its required role within the wider eastern Darling Harbour Precinct, rather than solely on Barangaroo.

2. Decommissioning of King Street Ferry Wharf

2.1 Impact of the proposal on Darling Harbour and King Street Wharf

Throughout the Environmental Impact Statement (EIS) and accompanying documentation the decommissioning of King Street Ferry Wharf is not assessed or considered in great detail, positioned by the proponent to be justified by the proposed construction of new ferry wharves.

Whilst it is acknowledged that the two nearest ferry wharves proposed are in proximity to King Street Wharf, the proposal is consistently positioned to benefit the future construction at Barangaroo with limited consideration of the impact of relocating public transport from existing employment and visitor hubs at King Street Wharf/Darling Harbour.

Page 91 of the EIS states a valid concern which has not been adequately addressed by the proponent or previous strategic planning documents such as the Barangaroo Integrated Transport Plan (2012) and the Sydney's Ferry Future Modernising Sydney's Ferries (2013) being the "future impact on Darling Harbour and King Street Wharf due to the relocation of the proposed ferry hub away from these destinations". The response provided by the proponent states that "details of the operation of the proposal and its interface with King Street Ferry Wharf and Darling Harbour are provided in Section 4.2.2."

Section 4.2.2 of the EIS outlines the proposed operation of the Barangaroo Ferry Hub however does not provide any assessment or due consideration of the impact the removal of public transport infrastructure in this location will have on Darling Harbour as an important precinct of Sydney's CBD and King Street Wharf.

Whilst it is not questioned that Barangaroo will create the demand for additional public transport requirements, this should not be to the detriment of significant existing trip generators and highly utilised and successful public space within the area. It is requested that within the Preferred Infrastructure Report and response to submissions the proponent adequately addresses the potential impact of the proposed decommissioning on King Street Wharf and development to the south of this precinct.

The proposed location of the Barangaroo Ferry Hub is considered in more detail in Section 3.1 of this submission.

2.2 Retention and Use of Existing Infrastructure

We believe that the services to the King Street Ferry Wharf should be retained, at least in part, for public transport infrastructure. Whilst it is recognised that King Street Ferry Wharf is approaching capacity, this wharf has been operating as a successful terminal supported by substantial trip generators and should be considered for future public use, rather than the construction of a third wharf, at the northern end of the proposed Ferry Hub.

The EIS considers the retention of the King Street Ferry Wharf within 'Option B'. This option was however rejected by the proponent as it would not "offer the full integration of the ferry hub with the Wynyard precinct development, nor would it address the deficiencies of the existing King Street Ferry Wharf". In response to the latter issue, we recognise that maintenance of King Street Ferry Wharf would potentially be required in the future, however this requirement is being pushed to future operators.

We request that Transport for NSW oversee a future upgrade of King Street Ferry Wharf, whether for use for public or private ferry services to ensure it can meet the required Disability Access Requirements and is adequately maintained to ensure its ongoing use for public, private and/or a combination of each operator.

With regards to the integration of the wharf and the Wynyard Precinct development, the retention of services at King Street Ferry Wharf, together with the construction of the two southern wharves at Barangaroo, as outlined in Section 3.2 of this submission, provides a successful integration with key pedestrian walkways from Wynyard and Transport Place.

2.3 Future Use of King Street Ferry Wharf

The application states that by decommissioning the King Street Ferry Wharf, it would open up capacity at the wharf for potential private and commercial operations. Despite this assertion, there is no consideration or assessment of the feasibility of this use. Of significant interest to Brookfield includes any future use of the King Street Ferry Wharf and as such we request consultation with regards to any proposal(s) that seek to utilise this asset for any purpose other than for public transport.

3. Proposed Construction of the Barangaroo Ferry Hub/ Terminal

3.1 Proposed Location of Wharves and Staging of Construction

The EIS remains ambiguous regarding the proposed staging of construction of the three ferry wharves. We note that it is proposed to construct two wharves within the first stage, with the third wharf to be completed at a later date, should the patronage warrant its construction.

This response is unsatisfactory as Brookfield requires more certainty regarding potential construction impacts and an understanding of walking catchments to the proposed public wharves. This is particularly pertinent should the proponent be successful in attaining an approval to decommission King Street Ferry Wharf, and further as a result of the clear economic and amenity adverse impacts anticipated to King Street Wharf as a result of this proposal and as outlined within this submission.

This section outlines clear justification for the first two wharves to be constructed at the southernmost end of Barangaroo. This is demonstrated in consideration of the following:

- Position within local context.
- The location of sensitive noise receivers within Barangaroo Residential buildings R8 and R9.
- Clustering of a critical mass to initiate ferry modal shift.
- The proximity and alignment to Wynyard Walk.

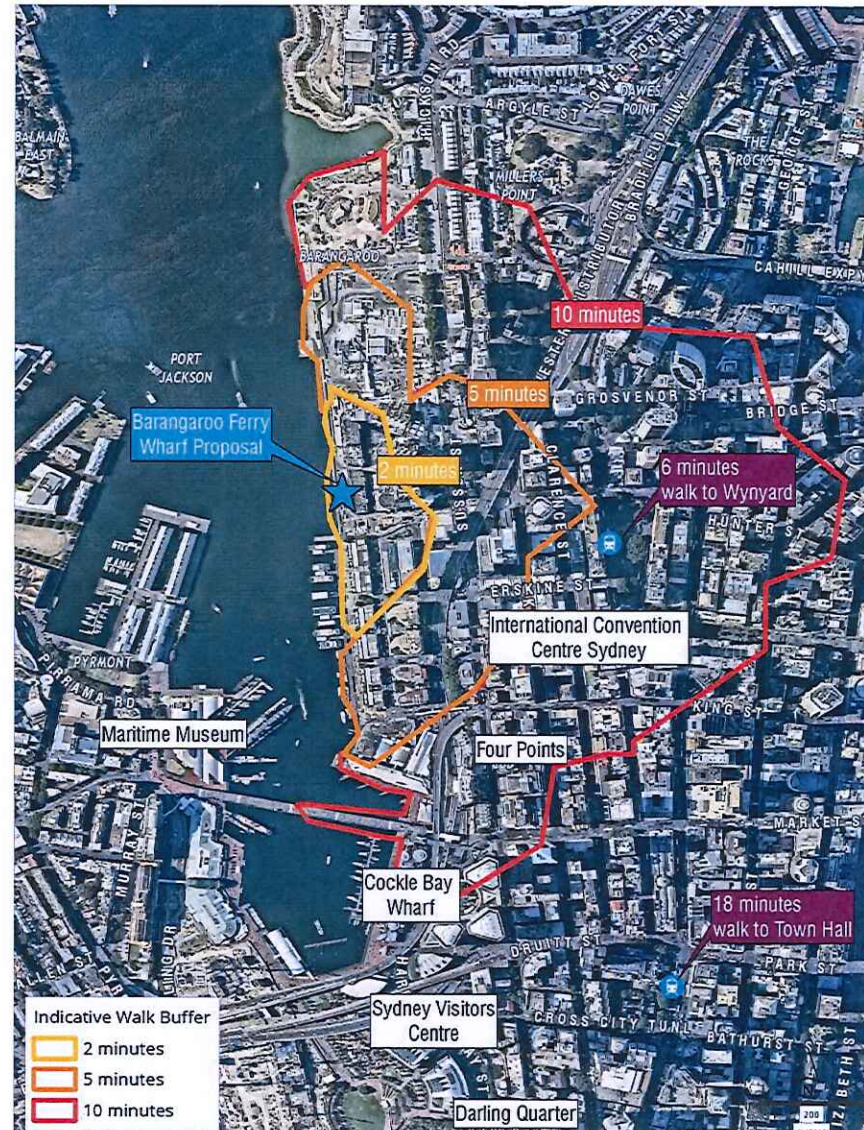
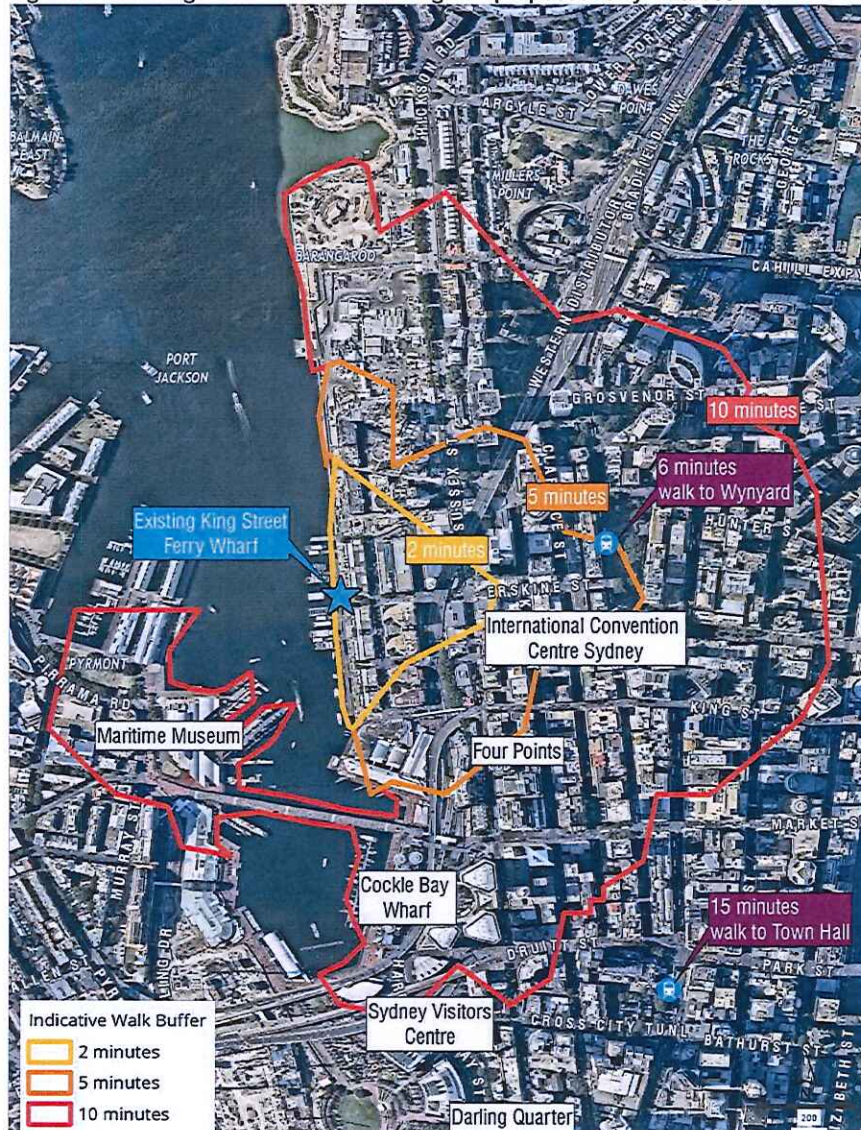
Each of these items are discussed in detail within this section.

3.1.1 Local Context

As alluded to within Section 2.1, this application places significant emphasis on the impact of the substantial growth of workers, residents and visitors to the area as a result of the Barangaroo development, compared to the existing and proposed densities located within the Darling Harbour and Cockle Bay precincts.

Figure 1 shows the current two, five and ten minute walking catchments of the existing King Street Ferry Wharf and the proposed Barangaroo Ferry Hub (as existing) and notes substantial redevelopment opportunities and trip generators at the southern and eastern area of Darling Harbour. Further, these figures show the areas that are currently located within 10 minute and 5 minute walking catchments at the existing Kind Street Ferry Wharf, however are outside of these catchments for the proposed Barangaroo Ferry Hub. This includes impacts to the 10 minute walking catchment of the Maritime Museum, Harbourside, and a greater eastern span of the CBD.

Figure 1 – Walking catchments the existing and proposed ferry wharves



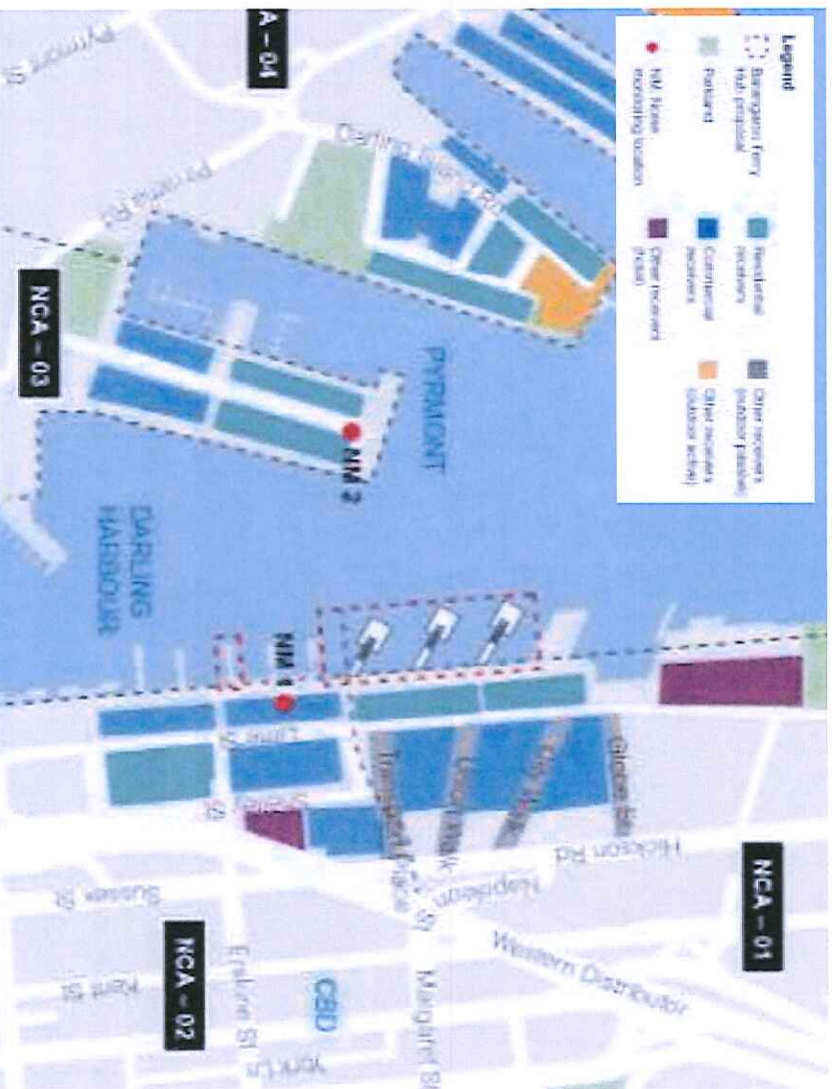
It should also be noted that based on Bureau of Transport Statistics 2006 data, the employment forecast (number of jobs) within the precinct bound by Darling Harbour, the southern boundary of Barangaroo, western Sussex Street properties, and Druitt Street was 30,261 in 2011 and predicted to grow to 38,238 in 2036. This employment density is substantial and is greater than the anticipated worker and residents predicted within Barangaroo.

Whilst it is not suggested that the Barangaroo development does not necessitate improved public transport for the area, we simply argue for the first stage of additional ferry wharves to be positioned adjacent to the existing wharves at King Street Wharf, rather than further to the north. The question remains whether the proposed Barangaroo Ferry Hub and changes made to the overall Sydney Ferry Network is in the interests of the wider Darling Harbour precinct, in addition to the Barangaroo development.

3.2.2 The location of sensitive noise receivers within Barangaroo Residential buildings R8 and R9.

Construction works have commenced on Commercial Buildings C3, C4 and C5, and Residential Buildings R8 and R9 at Barangaroo which are located adjacent to the public promenade adjacent to the proposed ferry wharves. The two buildings closest to the promenade include Residential Building R8 and R9, which were approved under MP11_0002. As demonstrated at Figure 3, the proposed wharves are located in closer proximity to sensitive receivers compared to the existing King Street Ferry Wharf.

Figure 3 - Noise catchment areas and monitoring locations excerpt (EIS 2014)



We consider it a sensible approach to cluster wharf activity around existing and planned commercial uses where maritime impacts are already established. It is noted that during the construction or operation of the proposal no 'moderate impact' or 'high impact' exceedances are anticipated within the King Street Wharf noise catchment area (NCA-02) during standard or outside standard hours. This is supported within the proposal, and Brookfield encourage any changes that are made to the proposal as a result of the response to submission maintain this limited disturbance to the precinct.

Despite this, significant exceedances including sleep disturbances are anticipated for the future Barangaroo noise catchment area (NCA-01), Pyrmont (NCA-03) and Pyrmont and Jones Bay Wharf (NCA-04) during the construction and operational phases of the development.

The EIS states that "a Construction Noise and Vibration Management Plan (CNVMP) will be included in the CEMP" to provide the framework for noise mitigation during the construction works. The proposal does not offer however significant mitigation methods for the proposed operational acoustic impacts of the proposal. We commend that this is addressed within the conditions of approval, and further emphasises the construction of the two southern wharves rather than the most northern wharf.

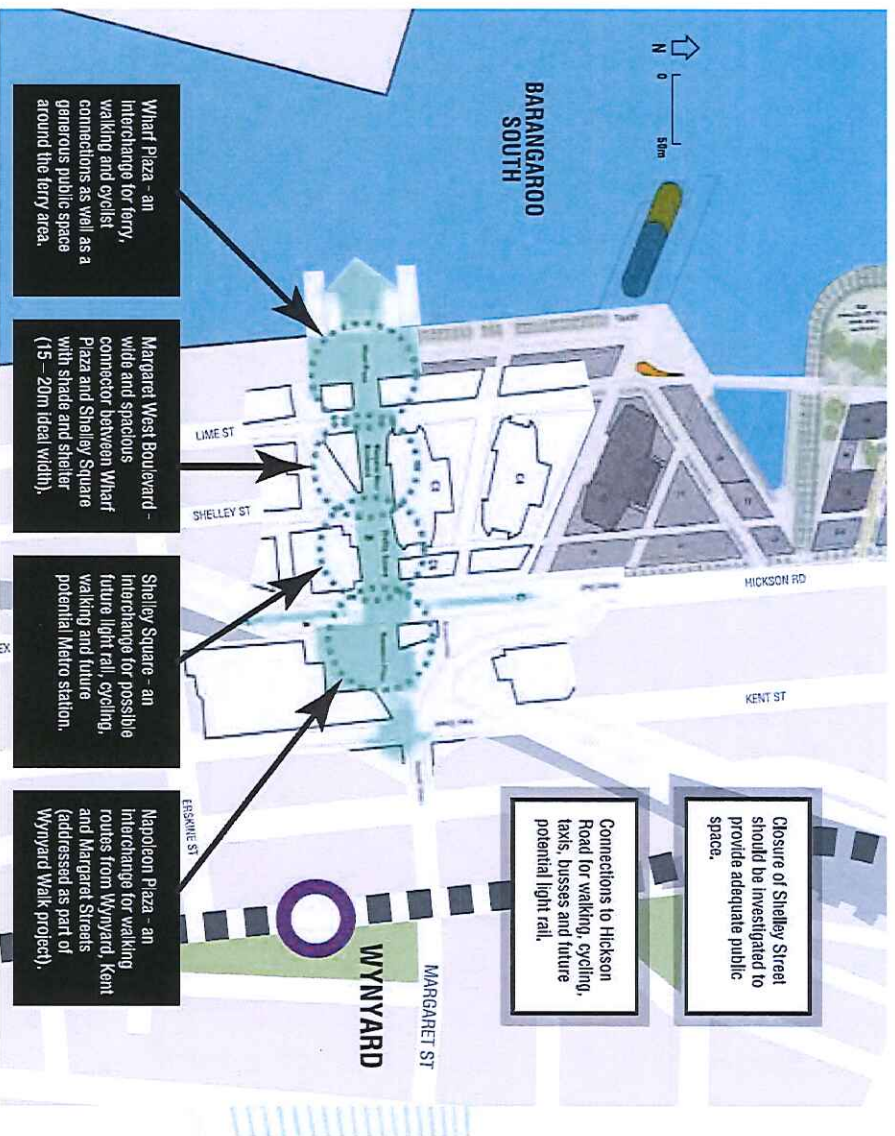
3.2.3 Clustering of a critical mass to initiate ferry modal shift.

In order to generate the modal shift that TNSW is seeking by improving ferry services to the Western CBD, the first ferry wharves to be constructed at the Barangaroo Hub should be strategically located adjacent to the existing and soon to be completed critical mass. As outlined within Section 3.2.1, the existing density is located at Shelley and Lime Streets and King Street Wharf.

3.2.4 The proximity and alignment to Wynyard Walk.

The Barangaroo Integrated Transport Plan (2012) supports the development of a Transport Square at Barangaroo. This concept of connecting Wynyard Station to the Barangaroo Ferry Wharf has been integrated within the planning of Barangaroo South notably through the provision of 'Transport Place', between the two southern ferry wharves proposed at Barangaroo. Notably, the Wynyard Walk Bridge will provide a direct connection from Wynyard Walk to Transport Place. This is clearly illustrated on page 139 of the EIS, outlined within the anticipated pedestrian movements illustrated on page 152 of the EIS, and within the Barangaroo Integrated Transport Plan as demonstrated within Figure 3 on the next page.

Figure 3 - Transport Square for Discussion (TfNSW, Barangaroo Integrated Transport Plan 2012)



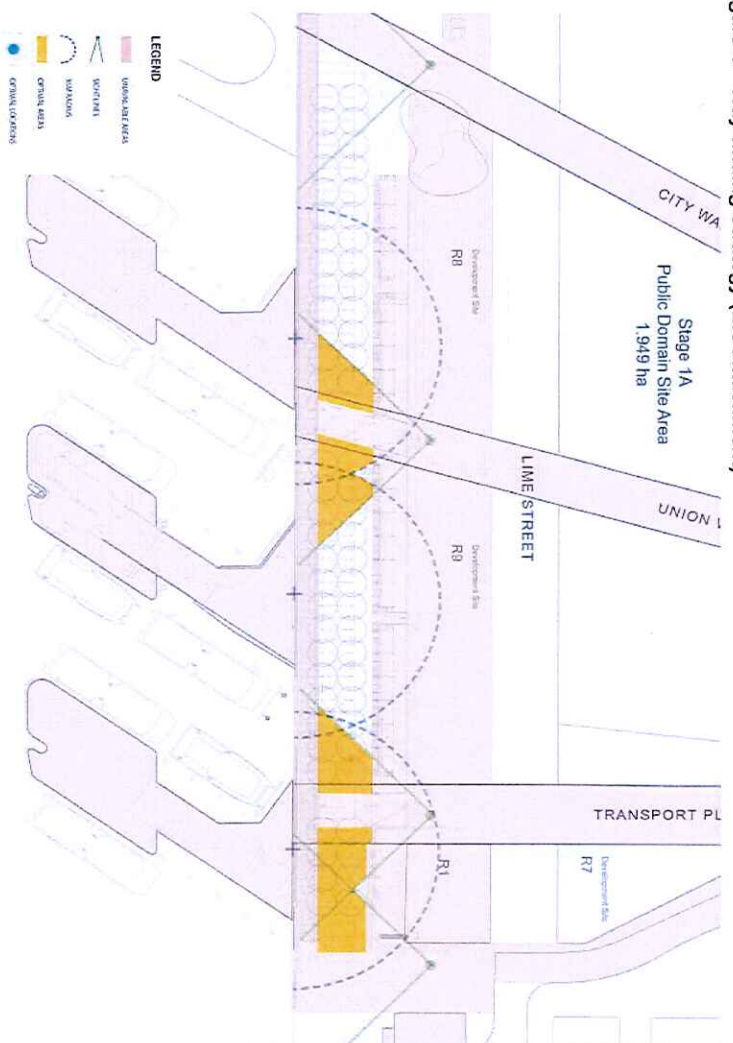
A State Significant Development Application is currently being assessed by the Department of Planning and Environment for the construction of Stage 1A public domain works, including the construction of Transport Place. As such, it is considered prudent to construct the first two of the wharves at the intersection of Transport Place to provide a direct connection not only to King Street Wharf but also to Wynyard Walk. This is further discussed in Section 2.2 of this submission.

3.2 Way-finding to King Street Wharf

The proponent states within the EIS (Page 223) that way-finding signage would identify and direct people to various Darling Harbour attractions, as well as connections with other public transport services. Brookfield support the inclusion of way-finding and directional signage at the proposed Barangaroo Ferry Hub to King Street Wharf and further destinations to the south of King Street Wharf recognising that it remains a significant trip generator, particularly for visitors.

Despite this assertion within the EIS, the proposal has not adequately considered this within the way-finding plan or another strategy. Further, as shown in Figure 4, the way-finding plan has been drafted with consideration of arriving at the site through Barangaroo only, rather than from properties to the south.

Figure 4 – Way-finding Strategy (EIS Attachment)



Brookfield seek to confirm from the proponent and the Department of Planning and Environment that the proposal will not result in the 'funnelling' of pedestrians through Barangaroo at the expense of visitors to King Street Wharf and Darling Harbour.

As accurately described within the EIS the following key destinations for customers alighting ferries at the Barangaroo Ferry Hub are anticipated and suitable way-finding and directional signage should be considered for each destinations from the proposed Ferry Hub:

- Commercial office component of Barangaroo South
- Existing Commercial towers within Shelley Street
- Waterfront Promenade restaurants and street activities
- Wynyard Station/Sydney CBD via Transport Place
- King Street Wharf/Darling Harbour via the Foreshore

In response to the above items we request that a way-finding strategy is provided by the proponent as part of this application which clearly considers and accommodates additional signage and way-finding imagery not only to development at Barangaroo, but also to existing and future development to the south.

3.3 Visual Impact

The proposal will have an adverse impact on visual amenity, landscape character and outlook for the existing retail and restaurant district at King Street Wharf. The EIS states that these views are of 'regional visual sensitivity' and views from the promenade will be considerably reduced due to the proposal.

In response to the above impact, which is considerable, the proponent has not given attention to any mitigation methods for these impacts within this application for comment. The application states that mitigation measures for visual amenity and urban character would ultimately form part of the CEMP and OEMP for the proposal.

We are concerned that consideration of transparent materials, possible minimisation of the scale of elements and reduction of visual clutter will not be adequately considered during the detailed design and further Brookfield will likely not be given another opportunity to comment on the proposed adverse visual impact of the proposal. As such we request that mitigation measures to reduce the visual impact of the proposal on the promenade and retail and restaurant offerings at King Street Wharf are outlined within this SSI application.

3.4 Construction Comments

With regards to the proposed construction of the Barangaroo Ferry Hub, we provide the following additional comments:

- The proponent states that a Construction Traffic Management Plan will be prepared before the commencement of work. It should be noted however that both inbound and outbound construction traffic routes are proposed adjacent to Brookfield assets at King Street Wharf and Shelley Street, and as such it is formally requested that these documents be provided to Brookfield for comment and note prior to construction commencing on the site.
- The EIS also states that should temporary closure of any pedestrian routes be required consultation would be undertaken with key stakeholders (including BDA and Lend Lease), however once again we request that Brookfield is consulted prior to the temporary closure of any pedestrian routes within the King Street Wharf Precinct.
- The EIS further states that detailed construction environmental management plans (CEMPs) would be prepared by the contractor(s) prior to commencement to manage potential adverse construction impacts of the proposal. This is unsatisfactory as at this point Brookfield would be unable to make a comment or submission on the proposed methodology of construction and impacts mitigation.

3.5 Operational Comments

With regards to the proposed operation of the Barangaroo Ferry Hub, we provide the following additional comments:

- Within Section 6.2.2 of the EIS, the proponent states that the proposed operational traffic impacts have been considered based on the construction of the initial two ferry wharves, and are seeking flexibility over the construction of the third. It is unclear as to whether the operation of a third ferry wharf has been considered for each of the potential operational issues. Should a third ferry wharf continue to be required, it should be assured that all relevant impact assessments consider the proposal at full operation within this SSI application.
- The operating hours of the Barangaroo Ferry Hub are proposed to be extended compared to the existing operation of King Street Ferry Wharf from 7:00am to 12:00 am Saturday, Sunday and public holidays and from 5:00am to 12:00am Monday to Friday. This increase in operation in proximity to King Street Wharf is supported.
- The proposal states that 'there could be a minor impact on King Street Wharf businesses' as a result of a reduction in passing trade due to the change in location of the ferry wharves. This in combination with the reduced visual amenity is considered to result in a significant impact to these businesses which have not been adequately addressed by the proponent. The only relevant mitigation measure offered by the proponent on this issue is with regards to a community liaison plan. This plan is supported however it is further

reiterated that ongoing liaison with Brookfield is expected with any works proposed within the King Street Wharf Precinct, particularly considering the impact anticipated on the existing retail and restaurant businesses at King Street Wharf.

4. Conclusion and Recommendations

Fundamentally we have three key objections to the decommissioning of King Street Ferry Wharf, including:

- The lack of assessment given to the impact the proposed removal of King Street Ferry Wharf on Darling Harbour and King Street Wharf, which are existing high demand destinations and employment generators;

- The fundamental question of retention and use of existing infrastructure; and

- Clarification on the future uses of the King Street Ferry Wharf.

In addition to our objection to the decommissioning of King Street Ferry Wharf, we provide the following comments relating to the construction of the Barangaroo Ferry Hub:

- The proposed location of the first two wharves should be at the most convenient location of the existing 'critical mass' to initiate modal shift, limit impact to sensitive receivers and be provided at the junction of key pedestrian routes. As such the proposed first two wharves to be constructed should be required immediately to the north of the existing King Street Ferry Wharves.

- Way-finding should be considered not only from within the Barangaroo development, but also within the surrounding local context notably including Darling Harbour.

- The visual impact of the proposal and possible mitigation measures to reduce such impact should be considered within this SSL application, rather than deferred to detailed design. In addition to the above concerns, this submission provides commentary on construction and operational impacts the proposal will have on King Street Wharf and surrounding developments.

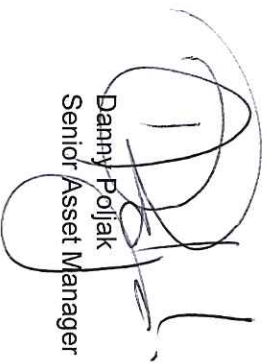
Fundamentally we support the following amendments to the proposal:

- Retention of public transport infrastructure at King Street Ferry Wharf to enable an appropriate diversity of uses of the wharf in the future.
- The construction of the two southern most wharves at Barangaroo within the first stage of construction.
- The investigation and funding of way-finding and directional signage from the Barangaroo Ferry Hub to King Street Wharf (including commercial office buildings) and destinations located at Darling Harbour (rather than funneling pedestrians to Barangaroo), and investigation of potential mitigation measures to reduce the visual impact of the proposed Ferry Hub.

We thank you for the opportunity to comment on the exhibited documentation and look forward to further consultation during the preparation of a Preferred Infrastructure Report to respond to any changes to the detailed design of King Street Ferry Wharf or the Barangaroo Ferry Hub.

Should you wish to further discuss our submission, please contact me on 02 9322 2796.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'DP', written over a horizontal line.

Danny Poljak
Senior Asset Manager