

24 June 2016

Lisa Mitchell
Department of Planning and Environment
23-33 Bridge Street
SYDNEY NSW 2000

Dear Lisa,

**Response to Public Exhibition of the State Significant Infrastructure Application for the Sydney Metro City & Southwest - Chatswood to Sydenham
8 Chifley, Sydney**

This submission has been prepared on behalf of Mirvac Real Estate Pty Ltd and K-REIT Asia (Keppel Land Limited), the co-owners of 8 Chifley, Sydney. The following sections of our correspondence provide:

- An overview of 8 Chifley, focussing on the specific land use activities which may be affected by the demolition, excavation and construction phases of the Sydney Metro.
- A brief description of the locational context of the proposed Martin Place Station (and associated construction site) having regard to 8 Chifley.
- Identification of key areas of concern arising from the review of the Environmental Impact Statement (EIS), including recommended actions and/or conditions of development consent should the project be approved by the Minister for Planning.

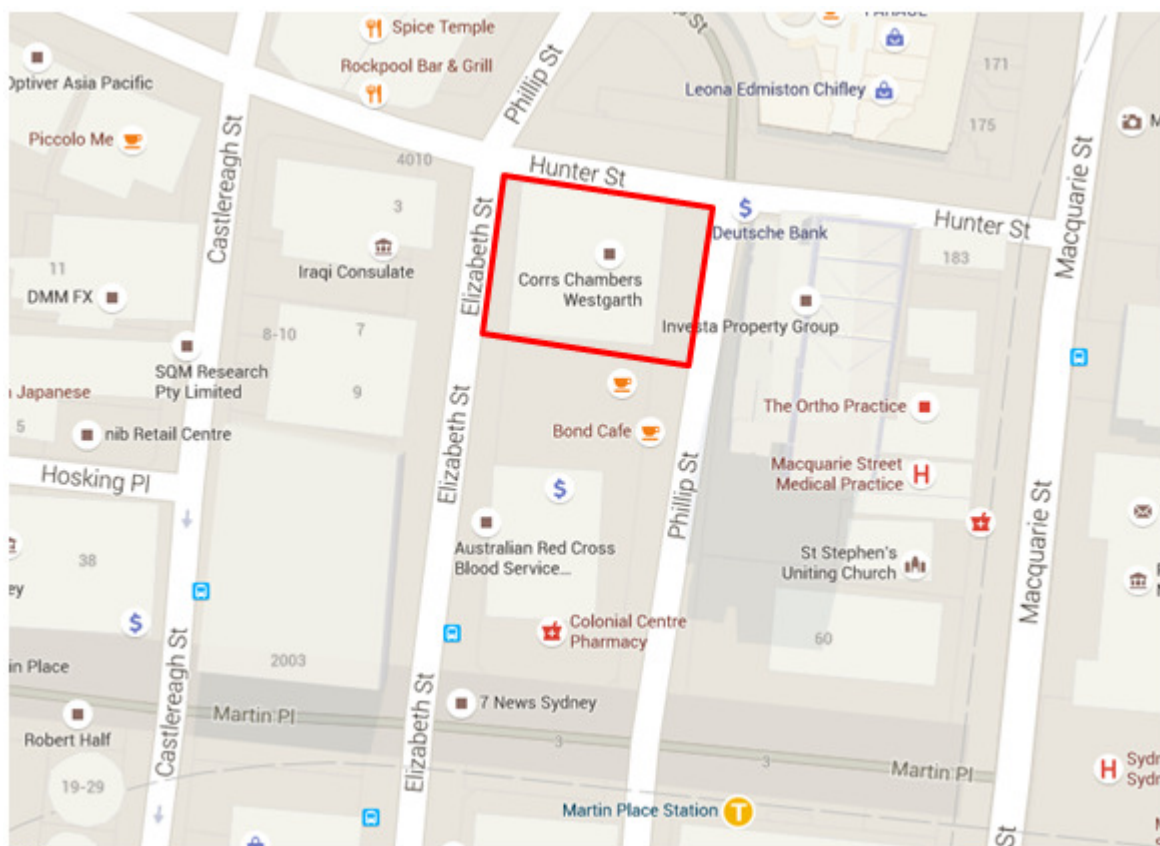
We would welcome the opportunity to discuss our submission with the Department and/or Transport for NSW in further detail, having particular regard to the importance of ongoing consultation prior to the commencement of the project and throughout the demolition, earthworks and construction phases.

1 8 Chifley

8 Chifley is located on the corner of Elizabeth, Hunter and Philip Streets in the Sydney Central Business District (CBD). A location map is provided as **Figure 1** on the following page. The site is approximately 100 metres walking distance to the nearest existing entry and exit staircase to Martin Place Railway Station and immediately opposite the proposed northern entry to the proposed Martin Place Station associated with the Sydney Metro proposal.

8 Chifley comprises a boutique premium grade landmark building which was designed by internationally renowned Richard Rogers of Rogers Stirk Harbour & Partners with the Lippmann Partnership. The building design was developed by way of an international design competition and has been awarded with a 6 Star Green Star Rating, representing 'World Leadership' in environmental sustainability practice.

FIGURE 1 – LOCATION MAP (SOURCE: GOOGLE MAPS, 2016)



The building includes a number of significant features which are of specific relevance with regard to the potential impacts arising from the future construction of the Sydney Metro. These include:

- A five storey public space is located at the ground level of the building, facing north towards Hunter Street. The upper space includes access to the commercial offices, food-related premises and associated outdoor dining, informal public seating and bicycle facilities. A lower space oriented towards Elizabeth Street and the proposed Martin Place Station accommodates an additional tenancy and outdoor dining area.
- The commercial office building comprises 23 levels of flexible workspaces, including seven vertical villages (ranging in size from 1,800 to 2,880sqm) and single commercial floors. The building benefits from excellent access to natural daylight with a transparent façade wrapping around the three street frontages and an internal atrium on the upper levels of the building. The building design comprises unique detailing and exposed structure which provides a high quality appearance and contribution to the streetscape.
- Two landscaped terrace areas are located within the commercial office building. A large three storey space is located on the 18th floor, providing external amenity for the vertical village located immediately below. A second open-air space is located on the upper most level, again, providing outdoor amenity for the village located immediately below.
- A range of environmentally sustainable features are included throughout the building, including active and passive sun shading, active chilled beam air conditioning and natural ventilation.

- The basement level includes 32 car parking spaces, four courier bays and a service vehicle bay. It also provides 129 secure bicycle spaces and lockers for tenants, male and female changing rooms with 13 showers and 28 visitor bicycle spaces.

A plan showing the western elevation of the building (immediately opposite the proposed Martin Place Station) is provided as **Figure 2** below. Floor plans for the low and high rise components of the building are provided as **Figure 3** and **Figure 4** on the following page. Each of these plans show the key building features likely to be affected by the delivery of the Sydney Metro, including the ground level public space, vertical villages, internal atriums and landscaped terraces.

FIGURE 2 – WESTERN ELEVATION OF 8 CHIFLEY (SOURCE: WWW.8CHIFLEY.COM.AU, 2016)

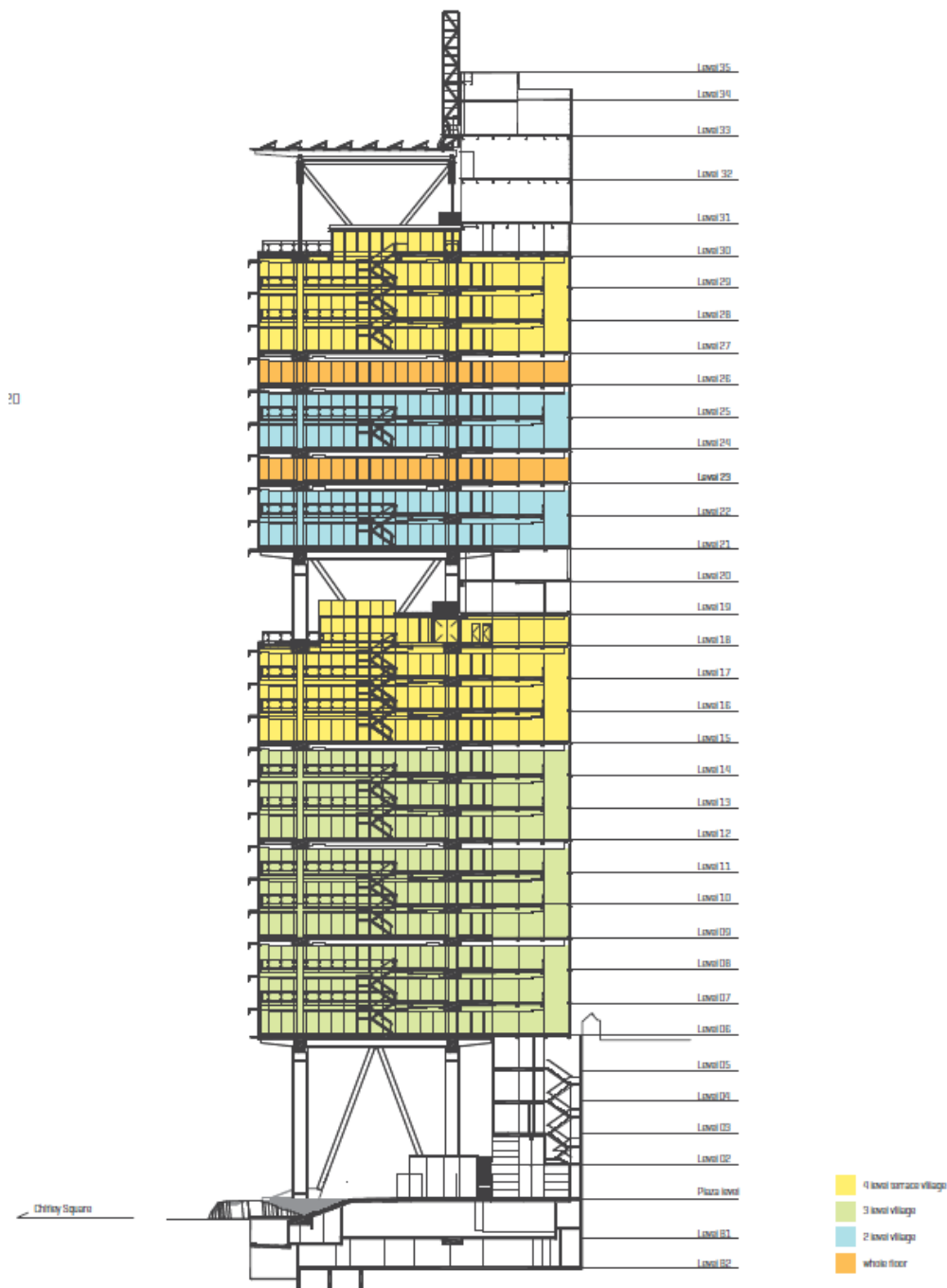


FIGURE 3 – LOW RISE FLOOR PLATE OF 8 CHIFLEY (SOURCE: WWW.8CHIFLEY.COM.AU, 2016)

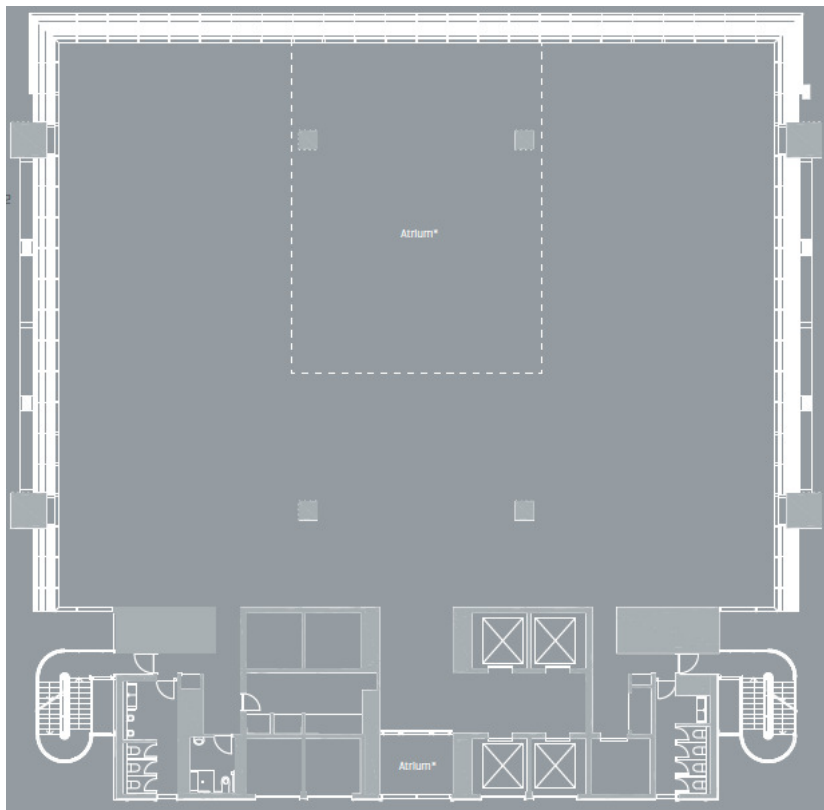
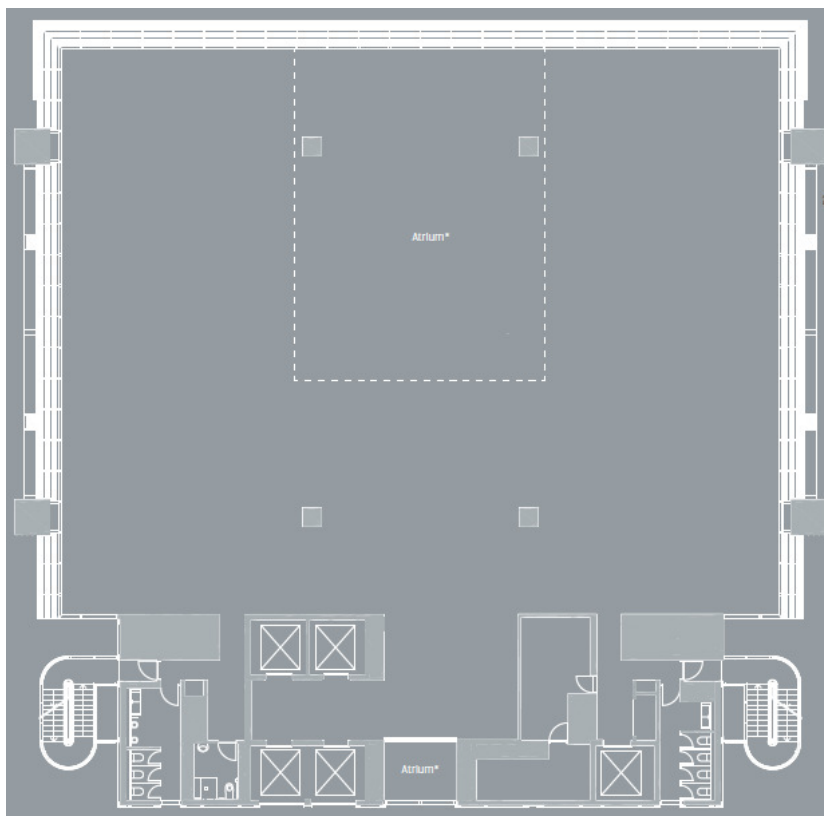


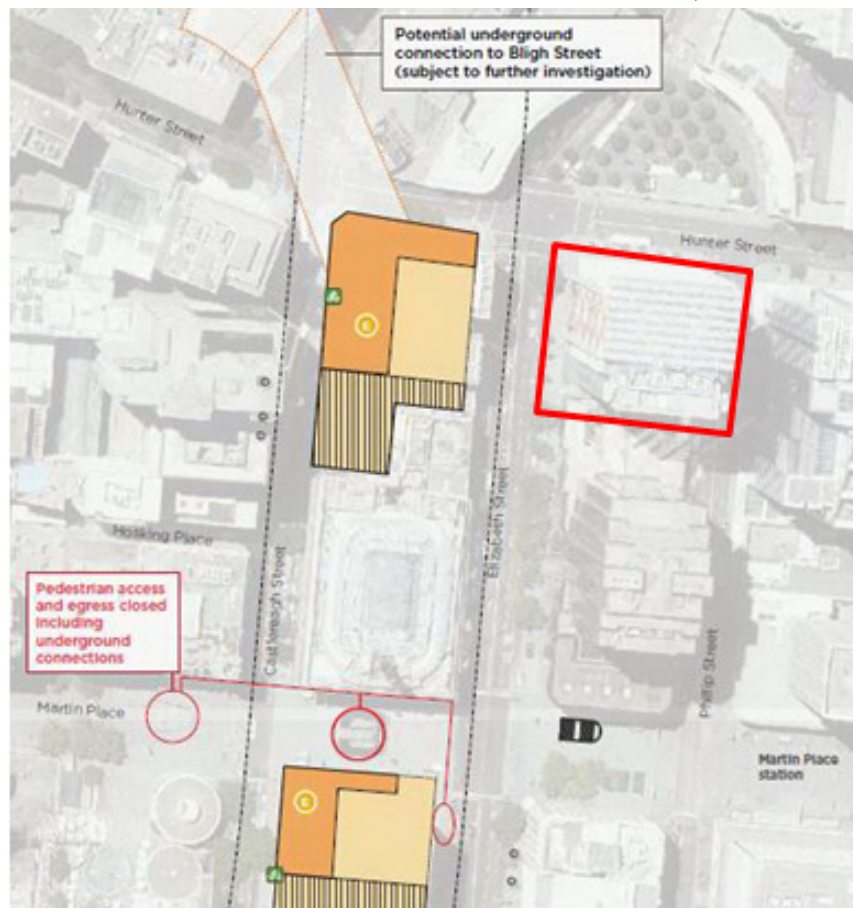
FIGURE 4 – HIGH RISE FLOOR PLATE OF 8 CHIFLEY (SOURCE: WWW.8CHIFLEY.COM.AU, 2016)



2 Project Context

The Martin Place Station is to be located to the south of Hunter Street between Castlereagh Street and Elizabeth Street. The northern entry to the station is proposed to be via a pedestrian plaza (shaded dark orange in the map extract below) which is located immediately to the west of 8 Chifley (as outlined in red).

FIGURE 5 – LOCATION OF MARTIN PLACE STATION AND 8 CHIFLEY (SOURCE: TRANSPORT FOR NSW, 2016)



The proximity of the proposed Metro Station to 8 Chifley is of particular concern for the co-owners of the building having specific regard to the following matters:

- Demolition, earthworks and construction phases of the development, particularly having regard to the duration of the proposed works and their impacts on the tenants and visitors to 8 Chifley.
- Built form and scale of the potential future above-station development at the northern entry to Martin Place Station.

It is acknowledged that the future above-station development does not form part of the EIS and will be subject to further development consent. The following section of this submission provides detailed discussion regarding the particular area of concern with regard to the demolition, earthworks and construction phases of the Sydney Metro project.

3 Key Issues and Recommended Actions

The co-owners of 8 Chifley recognise the strategic importance of the Sydney Metro City & Southwest for the Sydney metropolitan rail network and the potential benefits arising from the delivery of increased public transport services to the Sydney CBD.

However, it is critical that the key environmental issues associated with the proposed demolition, earthworks, construction and operation of the proposed Sydney Metro are carefully assessed to avoid significant adverse impacts on the adjoining land owners and tenants. This must include comprehensive details on the proposed mitigation and management measures that are to be implemented during the various stages of the project.

Particular concern is raised with regard to the duration of the proposed site establishment and station excavation works and the proximity of the construction site to 8 Chifley as shown below.

FIGURE 6 – MARTIN PLACE CONSTRUCTION SITE AND 8 CHIFLEY (SOURCE: TRANSPORT FOR NSW, 2016)

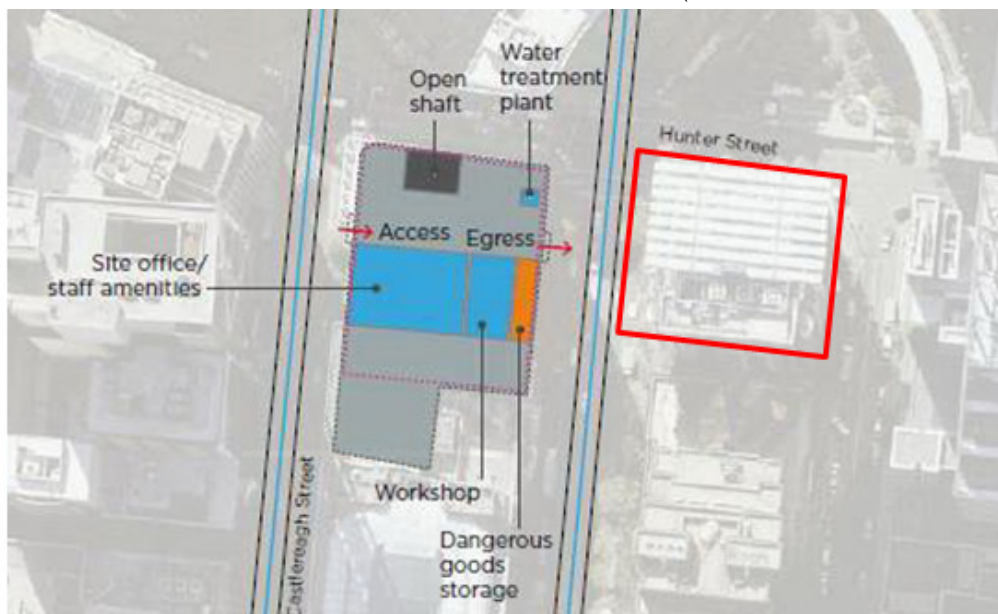
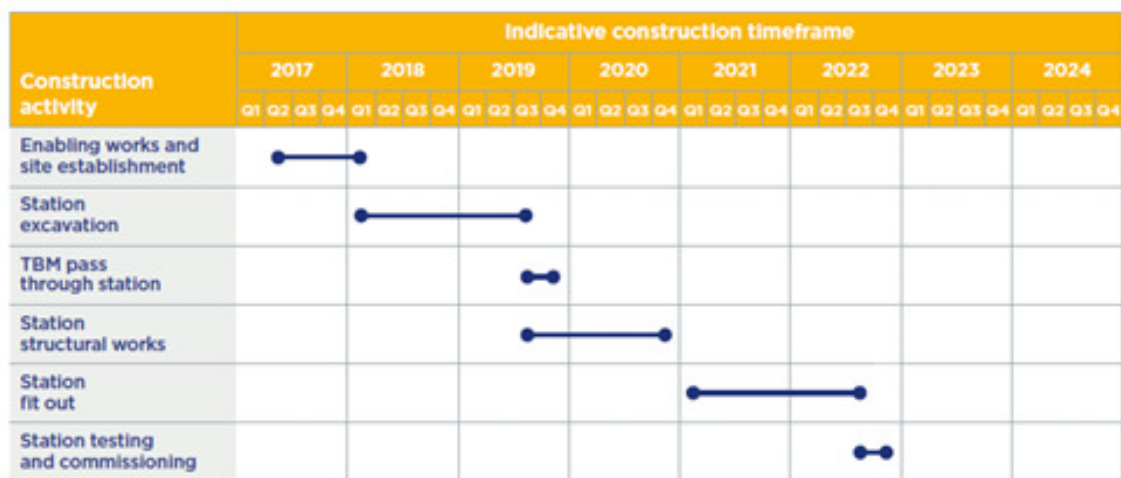


FIGURE 7 – MARTIN PLACE INDICATIVE CONSTRUCTION PROGRAMME (SOURCE: TRANSPORT FOR NSW, 2016)



The following sections of our submission identify the key issues that are of the greatest concern to the co-owners of 8 Chifley, including:

- Noise and vibration
- Air quality
- Transport and traffic

This section also provides recommended actions and/or conditions of consent to avoid, mitigate or manage the potential impacts of the development on 8 Chifley and its occupants and visitors.

3.1 NOISE AND VIBRATION

Mirvac is concerned regarding the lack of clarity provided within the EIS with regard to the potential noise and vibration impacts associated with the demolition, excavation and construction phases of the project. The EIS indicates that the future operation of the Sydney Metro is expected to comply with relevant noise and vibration criteria at Martin Place Station, however, insufficient information is provided to understand the significance of the impacts during the six year construction programme.

The EIS does not provide sufficient information for Mirvac to understand the way in which the potential noise and vibration impacts would affect the tenants of 8 Chifley on a day-to-day basis. There is also a lack of information regarding the mitigation measures that will be implemented at the Martin Place construction site and the level of effectiveness of these measures to provide adequate levels of internal and external amenity for the occupants and visitors to 8 Chifley.

Wilkinson Murray Pty Limited was engaged by Mirvac to conduct a technical review of the EIS, including the main report and *Technical Paper 2: Noise and Vibration* prepared by SLR Consulting. A copy of Wilkinson Murray's report is attached to this submission. An extract listing the key issues identified within their report is provided below:

- *The EIS fails to identify the specific uses of the Building occupants that occupy the premises at 8 Chifley Place.*
- *Construction Noise from early works (enabling and earthworks) will significantly impact on the outdoor café and Sushi Restaurant which faces the construction site. These receivers has not been identified or assessed. It is likely that these operations will be seriously affected for several months.*
- *Airborne Noise from the early works will exceed external commercial receivers noise management levels by between 10 and 20 dBA where internal noise levels of 60 to 70 dBA can be expected.*
- *Ground borne noise is predicted to be up to 60 dBA within occupied tenancies when rock breaking occurs. This noise levels will be clearly audible within office areas and will be of a level that will compromise on effective communication and confidentiality in some of these areas.*
- *The EIS does not provide the commitments that noise from construction can be adequately managed to all the receivers 8 Chifley Place. Consideration of other construction techniques and respite periods should be considered.*

It is clearly evident from the Wilkinson Murray report that further detailed consideration needs to be given to the potential acoustic and vibration impacts on the building occupants and visitors to 8 Chifley.

The EIS needs to provide further detailed assessment which considers the specific range of land use activities within 8 Chifley, including the location of these uses and their operating hours. Additional consideration also needs to be given to the mitigation measures that will need to be implemented at the Martin Place Station construction site to reduce these impacts and avoid any significant adverse impacts that would impact on the operations of the business located within 8 Chifley.

The Wilkinson Murray report indicates that the potential air-borne construction noise is likely to have a significant impact on the building occupants having regard to both the level of noise and the duration of the enabling and earthworks stages of the Sydney Metro project. These include:

- Sushi restaurant in Elizabeth Street and the outdoor café and public space facing Hunter Street - these outdoor facilities could be subjected to noise levels which would result in a major disruption on their day-to-day activities and human comfort levels. The predicted noise levels could have a significant effect on these businesses unless adequate noise mitigation measures are implemented at the construction site.
- Entrance foyer and the western side of the lower commercial office levels – these areas would also be subjected to noise levels which would have a major impact on communication levels and internal amenity impacts. Further detailed information is required to understand the likely effect of any mitigation measures that will be employed over the excavation works.

The Wilkinson Murray report also notes that the ground-borne noise associated with the rock breakers is likely to have a noticeable impact on the internal amenity of the commercial offices, having particular regard to the disturbing nature of this impulsive noise.

Overall, the Wilkinson Murray report indicates that the noise impacts likely to be experienced by the occupants and visitors to 8 Chifley are significant. These impacts would be experienced for several months and are likely to have a significant effect on 8 Chifley, including the sushi restaurant, outdoor café and the lower levels of the commercial office building. Accordingly, it is requested that alternative construction techniques should be assessed under the category of 'reasonable and feasible' consistent with the EPA's guidelines. Appropriate measures such as respite and rock saws should be considered.

Based on the findings of the Wilkinson Murray report, it is requested that the EIS (and the accompanying Technical Paper) is updated to provide a more comprehensive noise and vibration impact assessment that considers the range of land use activities within 8 Chifley and the acoustic sensitivity and hours of operation associated with these uses.

The *Construction Noise and Vibration Management Strategy* should also be updated to include additional information regarding the site-specific mitigation measures to be implemented at the Martin Place Station construction site to:

- Effectively reduce noise and vibration impacts on 8 Chifley; and
- Avoid significant adverse effects on the day-to-day operations of the existing land use activities in the surrounding locality.

Further detailed assessment needs to be provided regarding the proposed method of excavation for the station works, including the opportunities to reduce the duration of the construction programme through the use of alternative methods and/or the provision of respite periods to minimise the impacts on the surrounding land use activities.

3.2 AIR QUALITY

It is understood that the Sydney Metro would have a positive regional impact with regard to air quality having regard to the opportunities to increase the use of public transport use. While this is of benefit to the broader Sydney metropolitan area, more detailed consideration needs to be given to the local air quality impacts, particularly during the demolition, earthworks and construction phases.

The EIS identifies the potential air quality issues that could arise, however, insufficient detail is provided with regard to the predicted level of impact and/or the mitigation measures to be implemented during the various phases of the project. The EIS simply states that the potential impacts are expected to be “*comparable to other similar infrastructure projects*” and that “*standard mitigation measures*” would manage these impacts, potentially including wetting stockpiles and exposed surface and minimising dust-generating works during adverse weather conditions. This is considered insufficient having regard to the scale of the project, the significant amount of spoil to be removed from the Martin Place Station construction site (175,000m³) and the proximity of the site to high density commercial development, including 8 Chifley.

More detailed information should be provided within the EIS with regard to the extent of the potential air quality impacts associated with Martin Place Station. This should include additional information regarding the actual mitigation measures to be implemented during the demolition, earthworks and construction phases and their level of effectiveness in reducing impacts on air quality. Particular consideration needs to be given to 8 Chifley and its specific building features that could be affected by air-borne dust emissions. These include:

- **Air intakes:** 8 Chifley was designed to deliver exceptional environmental performance and sustainability. The development was awarded a 6 Star Green Star Rating – Office Design v2 rating, demonstrating ‘World Leadership’ in environmental sustainability practice. One of the key features associated with this achievement was the provision of active chilled beam air conditioning and natural ventilation.

Significant concern is raised that the potential dust emissions arising from the works associated with the construction of Martin Place Station will have an adverse impact on the operation and function of the air intakes for 8 Chifley. This could have a major impact on the level of indoor quality associated with the natural ventilation of the building. Further, it could place significant additional pressure on the air filtration system, potentially requiring more regular maintenance and/or replacement of filters.

In addition to the above, the glass lobby for 8 Chifley has louvers which provide for natural cross ventilation and contribute to the overall environmental performance of the building. Any dust emissions arising from the demolition, earthworks and construction of the building could penetrate the lobby and have an adverse effect on its internal amenity, as well as requiring extensive additional cleaning and costs for the building owners. It is critical that dust emissions are appropriately mitigated to avoid such impacts on the locality and adjoining property owners.

- **Façade:** the building façade of 8 Chifley was designed so that the commercial office tenants would benefit from excellent access to natural daylight and solar access. The transparent façade along the Elizabeth, Hunter and Philip Street frontages provides 45% more perimeter space compared to a traditional office floorplate. The internal atrium on the upper levels of the building also provides additional natural light along the southern part of the site. The ground level lobby area at 8 Chifley also comprises significant glazed areas in order to achieve the large four-storey public open space on the northern side of the building. Specialised cleaning methods are required to maintain the glass façade, having regard to the location and design and scale of the ground floor lobby area.

Similar to the above point, concerns are raised with regard to the potential dust emissions arising from the construction site for Martin Place Station and the impacts on the maintenance

requirements for 8 Chifley, including the potential for increased cleaning and associated increased costs which should not be borne by the co-owners of the building.

- **External amenity:** 8 Chifley includes a large publicly accessible space on the northern side of the building which currently accommodates a café with ancillary outdoor dining and informal public seating. The development takes advantage of the sloping topography by providing an additional retail tenancy below the public space along the Elizabeth Street frontage which is currently accommodated by a sushi shop with ancillary outdoor dining.

Similar to the above points, concern is raised that the potential dust emissions from the construction site for the Martin Place Station will have a significant impact on the external amenity and useability of these spaces the demolition, excavation and construction of the proposed station. Particular consideration will need to be given to the sushi shop which is located at the footpath level on Elizabeth Street, immediately opposite the construction site. The proposed mitigation measures will need to ensure that the Sydney Metro will not have any adverse impacts with regard to the relevant food safety requirements and internal amenity within the food premises, as well as the external amenity of the outdoor dining area.

A Construction Environmental Management Plan should be prepared which provides detailed specialist information regarding the way in which the environmental issues will be managed. This should include the preparation of an Air Quality Management Plan which clearly details the specific mitigation measures to be implemented during the demolition, excavation and construction phases. This should include:

- A detailed layout plan for the construction site that includes the location of plant and equipment, stockpiles and mitigation measures to be implemented to reduce dust emissions and other air quality impacts.
- A detailed list of procedures and mitigation measures to control and/or manage dust emissions arising from the individual construction sites, including contingency measures where the standard recommended measures are not effective.
- A defined list of roles, responsibilities and reporting requirements to avoid, minimise and mitigate potential dust emissions.

A draft version of the Air Quality Management Plan should be provided for review by the affected landowners to understand the mitigation measures that are likely to be implemented on the site. A final version of the Air Quality Management Plan should form part of the Construction Environmental Management Plan and incorporate feedback from the affected landowners regarding the specific air quality issues for each of the station precincts.

3.3 TRANSPORT AND TRAFFIC

The EIS indicates that the demolition, excavation and construction phases of the Sydney Metro would result in a number of disruptions to the existing transport and traffic infrastructure within the immediate locality of 8 Chifley. These include:

- Full or partial temporary road closures during the night-time period.
- Construction vehicle movements impacting on the operation of the surrounding local road network and pedestrian movements.
- Temporary narrowing of footpaths along Elizabeth and Castlereagh Streets by approximately 600mm for an approximate distance of 200 metres.

- Temporary partial closure of Martin Place and underground connections between Castlereagh and Elizabeth Streets for approximately six months to allow for cut-and-cover work.
- Permanent closure of the existing entry and exit points to Martin Place Station to the west of Castlereagh Street.
- Temporary relocation of bus stops on Castlereagh or Elizabeth Streets, if required.
- Temporary rail track possessions for possible service relocations and strengthening works to existing rail tunnels and modifications to existing underground pedestrian facilities.

The night-time operations are considered less likely to have a significant impact compared to the works that are proposed during the day-time period. Significant concern is raised regarding the potential impacts of the construction vehicles on the local road network, including the tipper trucks that will be required to remove the estimated 175,000 cubic metres of spoil. These trucks are proposed to enter the Martin Place Station construction site via a left-in movement from Castlereagh Street and exit via a left-turn movement into Elizabeth Street. Approximately 25-26 heavy vehicle movements and 10 light vehicle movements are proposed every hour during the peak day-time operations, equating to approximately one vehicle movement every 1-2 minutes.

The indicative construction site layout (provided as **Figure 6** within this submission) shows that the proposed left-out exit driveway is to be located immediately opposite the access driveway to the basement level of 8 Chifley. Concern is raised that the heavy and light construction vehicles exiting this driveway could have an adverse effect on the accessibility and operational safety of the 8 Chifley driveway which provides access to 32 car parking spaces, four courier bays, a service vehicle bay, 129 tenant bicycle spaces and 28 visitor bicycle spaces.

The EIS also indicates that pedestrian movements are likely to be significantly affected by the six month closure of the existing station entrances to the south of Elizabeth Street. This will place additional pressure on the remaining entrances and reduce their level of performance. In particular, the staircase adjacent to the Reserve Bank and the staircase between Elizabeth and Phillip Streets are predicted to operate at Level of Service F. This represents a potential major inconvenience to commuters due to the impact on pedestrian flows, as well as a potential safety issue during an emergency scenario.

Concerns are raised regarding both the temporary and permanent changes arising from the construction of Martin Place Station and the potential impacts on the tenants and visitors to 8 Chifley. Further detailed consideration also needs to be given to the proposed closure of the Martin Place railway station entrances, particularly during peak periods and special events (eg Vivid Festival).

The proposed Road Safety Audit (Reference T2) should include further assessment of the proposed siting and design of the construction vehicle exit driveway from the Martin Place Station construction site to avoid operational and safety impacts on the existing access driveway to 8 Chifley.

Further, the Construction Environmental Management Plan should also incorporate a detailed Construction Traffic Management Plan which clearly details the specific mitigation and management measures to be implemented during the demolition, excavation and construction phases. This should include:

- A detailed layout plan for the construction site that incorporates a revised location for the proposed left-out exit driveway.
- A detailed list of procedures and mitigation/management measures to maintain adequate safety for pedestrians, cyclists and vehicle drivers.

- A defined list of roles, responsibilities and reporting requirements to avoid, minimise and mitigate potential dust emissions.

A draft version of the Construction Traffic Management Plan should be provided to the affected landowners for comment. A final version of the Construction Traffic Management Plan should form part of the Construction Environmental Management Plan and incorporate feedback from the affected landowners regarding the site-specific transport and traffic related issues.

4 Summary

Overall, the co-owners of 8 Chifley are generally supportive of the Sydney Metro City & Southwest - Chatswood to Sydenham Project. However, concern is raised regarding the level of detail provided within the EIS regarding a number of significant environmental issues, including noise and vibration, air quality and transport and traffic impacts.

Our submission includes requests for additional information within the EIS to provide greater clarity regarding the scope of works and the potential impacts of the proposal on 8 Chifley. This includes:

- Additional information regarding the expected duration of the project, having particular regard to the potential use of blasting to reduce the length of time associated with the excavation of Martin Place Station.
- Additional site-specific assessment of the potential noise and vibration impacts on 8 Chifley having regard to the existing land use activities, their locations and operating hours.
- Further clarification of the mitigation measures proposed to be implemented at the Martin Place Station construction site and the likely effectiveness of these measures to reduce and/or manage noise and vibration impacts and avoid significant adverse effects on the existing land use activities within the clarity.
- Further detailed information should be provided regarding the potential air quality impacts and the mitigation measures to be implemented at each of the construction sites (including Martin Place Station) during the various phases of the project.
- The proposed left-out exit driveway from the Martin Place Station construction site to Philip Street needs to be relocated to avoid causing conflicts with the access driveway to 8 Chifley.
- Further detailed consideration needs to be given to the potential impacts of the construction process on pedestrian movements and safety, particularly during the temporary closure of the existing entrances to Martin Place railway station.

The submission also includes a number of recommendations to be incorporated within a Construction Environmental Management Plan to avoid, minimise, mitigate and/or manage the potential impacts of the demolition, excavation and construction of the Martin Place Station. These include preparation of a number of supporting technical documents, including:

- Updated Construction Noise and Vibration Management Strategy
- Air Quality Impact Management Plan
- Construction Traffic Management Plan

In addition to the above technical matters, it is strongly recommended that an Owners Group is established to provide for effective two-way communication during the various phases of the development. This group would meet on a regular basis and be provided with ongoing information

regarding imminent works, road closures, pedestrian impacts and general updates on the progress of the project.

Mirvac has been directly involved with the Owners Group associated with the George Street Light Rail Project, having regard to the potential implications for a number of their assets including the Metcentre at 60 Margaret Street and their new commercial office building at 200 George Street. Mirvac considers that this process has been very successful in developing an effective communications plan, particularly with regard to the existing building occupants at 60 Margaret Street. Accordingly, it is Mirvac's strong view that a similar approach should be adopted with regard to the Sydney Metro Project.

We would welcome the opportunity to discuss our submission with the Department of Planning and Environment and/or Transport for NSW in further detail. Please do not hesitate to contact me on 8233 9931 to discuss.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Jennifer Cooper".

Jennifer Cooper
Director