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1.0 Introduction

This Plan of Management has been prepared on behalf of China Centre Development Pty Ltd in relation to the proposed hotel development at 338 Pitt Street Sydney. It outlines hotel management policies and addresses security protocols for the operation of the proposed development, the subject of a Stage 2 State Significant Development (SSD) Development Application (DA) with the City of Sydney Council.

This Plan of Management responds to the requirements of the Sydney DCP 2012 Section 4.4.8.5 (10). It establishes a framework for the management of on-going operations by the future hotel operator.

The proposed hotel has been designed with a boutique character with hotel rooms and facilities located across a series of connected podium buildings. As shown in **Figure 1** (overleaf), Level 9 to Level 17 of the South Tower are also occupied by hotel rooms. In total, the hotel will contain 158 hotel rooms. There is a spa on Level 8 and hotel guests will have access to the Sky Terrace, which provides a bar and restaurant (Level 32) and gym, pool and spa (Level 34).

The main pedestrian entry to the hotel is from Castlereagh Street. There is also a secondary pedestrian entry from Pitt Street. A porte-cochere, accessed from Pitt Street, on the Lower Ground Level accommodates the hotel set-down/pick-up activity. The porte-cochere is located adjacent the hotel lobby and lift cores, ensuring efficiency and ease of access for users.

This Plan of Management explains how the hotel premises will be operated to meet obligations associated with the hotel's management policies, liquor licensing requirements, the safety and security of the hotel's patrons and to minimise impacts on neighbours.

1.1 Proposed Operator

An operator for the hotel is yet to be confirmed. As stated above, the Plan of Management establishes a framework for the management of on-going operations by the future hotel operator.

1.2 Objectives of the Plan of Management

The objectives of the Plan of Management are to assist the future operator with the management of the hotel to ensure it is well managed at all times and to achieve the following aims:

- ensuring maximum occupancy requirements are not exceeded;
- minimising the impact of noise from the premises to adjoining properties;
- waste minimisation, storage and collection procedures;
- staffing arrangements including the number of staff to be employed;
- any proposed shuttle service providing a pickup and drop off service to guests, including details of the timetable and set down arrangements;
- the maintenance and cleanliness of the premises;
- ensuring the on-going workability of emergency systems including lighting and smoke detectors, sprinkler systems, and air conditioning;
- ensuring staff there is an understanding with the owner and operator that staff are trained in relation to the operation of the approved Emergency Management and Evacuation Plan;
- ensuring the placement and composition of furnishings and fittings achieve appropriate fire safety requirements;
- ensuring there is a requirement that the premises are regularly checked to ensure fire safety including that all required exits and egress paths are clear and free of locks and obstructions; and
- onsite security.

The Plan of Management will be updated to reflect the detailed operational and management requirements of the operator once they are confirmed.

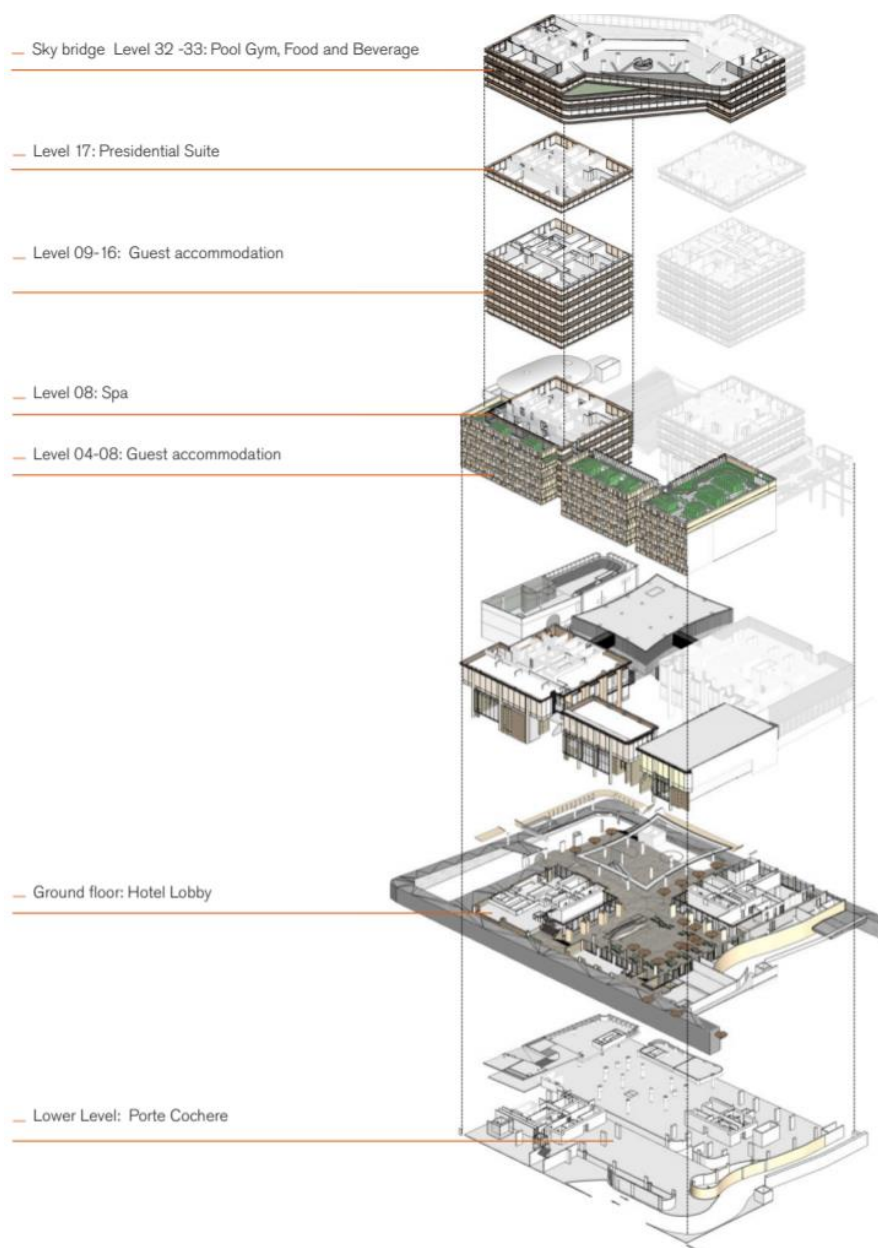


Figure 1 Proposed Hotel Uses (looking south-west from Castlereagh Street)

Source: FJMT

1.3 Implementation

The Plan of Management is a dynamic document and can be updated to respond to changing procedures and practices. All staff and management will be provided with a copy of the Plan of Management and be briefed on the requirements as part of the employment induction process. A copy of the Plan of Management will always be available on site .

1.4 Site and Locality Details

338 Pitt Street is located in the south-eastern part of the Sydney CBD, within the Sydney Local Government Area (LGA), in a locality characterised by high rise commercial and residential development. The location of the site within this part of the CBD ensures that it is accessible to a wide range of commercial, retail, entertainment and cultural destinations. Council has recently identified the locality as the 'midtown precinct', with a diverse employment profile, good accessibility and more affordable commercial office floor space in comparison to other parts of the CBD.

The character of the south eastern part of the CBD is currently in transition, with older style shopfronts, heritage buildings, and modern residential and commercial development. A number of recent development approvals have also been granted in the vicinity of the site, with the precinct becoming a mixed-use neighbourhood.

Elizabeth Street and Castlereagh Street are both critical north/south bus routes, with Castlereagh and Pitt Street being key pedestrian north/south connections. Liverpool Street is one of the primary east-west links in the southern portion of the CBD, connecting Oxford Street and Surry Hills, through the CBD, to Darling Harbour and the Sydney International Convention Centre, Exhibition Centre and Entertainment Centre precinct. The site is located within close proximity to Town Hall Station and Museum Station, as well as the future Pitt Street South CBD Metro Station.

2.0 Operational Management Plan

2.1 Overview

The operation of the hotel is to have regard to the objectives outlined above and matters outlined below.

2.2 Hours of Operation

The following hours of operation apply:

- The Hotel will operate 24 hours a day, 7 days a week;
- The café, bar and restaurant will operate 24 hours a day, 7 days a week; and
- The rooftop terrace will operate 7 days a week with the operational hours subject to hotel business demand.

2.3 Patron Arrival

The lobby will be clearly identified and identified and will always be managed by hotel staff to manage guest check-in/outs and building related enquiries.

2.4 Checking in/out

All guest bookings and check in/out services will be carried out in the reception area and will be tracked by a Property Management Software system used to monitor and regulate hotel bookings.

2.5 Access

2.5.1 Vehicle Access

Vehicle access to the hotel drop off and hotel lobby is provided from Pitt Street to the Lower Ground floor. Guests who require parking will be able to use the 35 dedicated hotel car parking bays in the basement levels.

2.5.2 Pedestrian Access

Pedestrian access to the ground floor lobby is provided from Castlereagh Street.

2.5.3 Maximum Stay – Hotel Rooms

The maximum permitted length of stay for the hotel rooms is three (3) months. Where accommodation is provided for more than 28 consecutive days, no more than two adults and one child are permitted per room.

2.5.4 Guest Security

The hotel lobby, loading dock and common areas will be monitored 24 hours per day via CCTV monitoring, as well as by trained hotel staff during business hours.

Individual, secure, lockable storage facilities will be provided within each hotel room to allow guests to individually store key travel items within the room. An additional secure baggage store area will be provided near the hotel reception.

The entire development will be secured by electrical key cards restricting and controlling access for hotel guests and staff.

Access to the hotel rooms and the upper level amenities will only be available via secured electronic key cards. Each card will only allow access to their corresponding level and communal facilities (e.g. Level 3 cards will not be able to access Level 4).

2.5.5 Public Transport

The site's central location and range of public transport options encourages travel by public transport and foot. The hotel will contain maps that show the proximity of key destinations and the area's transport hubs for visitors who may wish to visit using public transport. Due to the highly accessible location of Sydney's CBD, there are several transport options available including:

- Museum railway station is located approximately 250 metres to the east and Town Hall Station is located approximately 350 metres to the north.
- The site is highly accessible with respect to walking and cycling. As is typical in the CBD, existing well-established pedestrian networks are provided around the site, which ensure safe and legible networks for the site as both a destination and origin for people trips. Formal crossing points are provided at local signalised intersections.
- CBD and South East Light Rail will deliver services every two or three minutes during peak periods with continued high frequency services throughout the day. The nearest stop is located at World Square, approximately 250 metres (a three-minute walk) to the south-west on George Street
- The future Pitt Street Metro station will also be approximately 150 metres north of the site and will further enhance the site as a highly accessible location.

2.6 Hotel Cleaning

The hotel's housekeeping and stewarding staff are responsible for the maintenance of the premises to ensure it is always in a clean and tidy state. The hotel's management will also ensure that areas surrounding the premises are monitored on a continual basis and that all fire escapes and stairways are always kept clear of obstructions.

2.7 Deliveries and Servicing

Deliveries and servicing to the hotel will occur in accordance with the following key principles:

- Deliveries of goods and services, and collection of waste and other materials is to occur via the loading dock accessed from Pitt Street;
- The majority of goods delivered, as well as waste collection will occur during off-peak periods, where possible. This will limit any disturbance to guests on the premises or the amenity of the surrounding area.
- Deliveries and collection of linen/laundry should occur between the hours of 7am and 10pm, 7 days per week.
- Deliveries of goods to service the hotel café, bar and restaurant should occur between the hours of 7am and 10pm, 7 days per week.
- Delivery vehicles that service the site are to be no larger than a medium rigid vehicle (i.e. 8.8m length).
- The hotel's Management are responsible for coordinating delivery and servicing times to ensure that overlapping of delivery vehicles does not occur. This could include allocation of delivery windows for specific service providers.
- Access for deliveries and waste collection will not cause any interruption to the flow of external traffic. It will be desirable for all loading and unloading to be undertaken wholly within the premises with no deliveries, loading or unloading occurring on the street.

Figure 2 illustrates the proposed Basement 1 floor design, including the loading dock, Telstra Parking, Hotel BOH, and Plant.

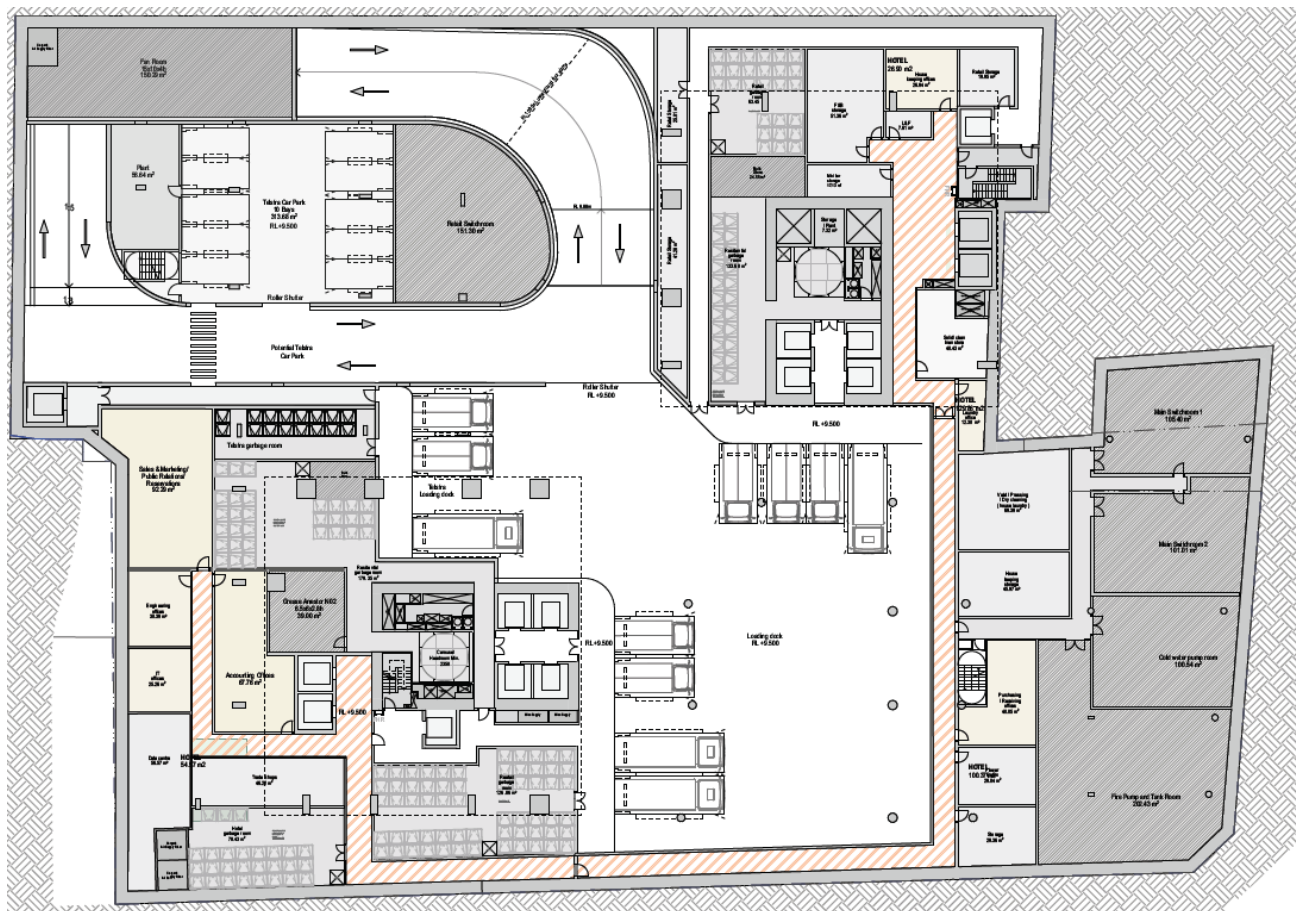


Figure 2: Basement 1 floor plan

Source: FJMT

2.8 Staffing

The hotel will employ full time and part time staff operating in shifts. Contractors may be present on the site at any one time. The total number of full-time staff will be confirmed by the future operator.

2.8.1 Recruitment policy

It is recommended that the future operator will be required to adhere to recruit the best person possible for the job, irrespective of colour, race, sex, sexual orientation, pregnancy, physical impairment or marital status and to encourage promotion from within the hotel.

2.8.2 Equal employment opportunities

It is recommended that the future operator fully supports the Federal, State and Local Governments' policy of equal opportunity for all persons. This policy is based on the principles of Equity and Fairness embodied in the government's anti-discrimination legislation. The objectives of this legislation are to eliminate and ensure the absence of discrimination in employment and to actively promote equal employment opportunities for minorities, men, women, and the physically impaired.

2.8.3 Training policy

It is recommended that all staff are trained to understand the relevant security measures. Staff training days should be held on a regular basis to reinforce safety and security procedures for each of the businesses. Training will ensure that in the event of a robbery, theft or anti-social behaviour, staff acts in a manner to best protect themselves.

Employees will be encouraged to report any suspicious activity or persons in and around the area to the Management and / or Local Police.

It is recommended that at all times a staff member proficient and appropriately certified in first aid qualification is on duty to respond to a medical incident on the premises. Appropriate equipment such as Automated External Defibrillator devices and first aid kits will be available with staff trained in their use.

2.9 Building Design and Safety Procedures

The building has been designed to ensure the enjoyment and safety of guests. The lifts will adequately service the guests to travel between the lobby, reception, the café, bar and restaurant and their hotel floor. Fire stairs have been incorporated into the design as an alternative means of egress during an emergency. Common areas and the hotel rooms will be sprinkler protected and a Building Occupant Warning System (BOWS) will be installed into the building for fire evacuations. All building emergency systems will be periodically tested including lighting and smoke detectors, sprinkler systems, and air conditioning as part of normal operational procedures.

An Emergency Management and Evacuation Plan will form part of the operation of the hotel and all staff and security will be appropriately trained in relation to administering and implementing the Plan. A range of measures have been implemented into the building to minimise the impact of noise from adjoining neighbours within the building.

The hotel floors will be acoustically treated for both air borne noise and foot fall noise to comply with the requirements of City of Sydney Council's DCP and BCA. Walls between hotel rooms will be designed to comply with BCA and City of Sydney Council's DCP requirements, and all mechanical services will be treated for compliance with Sydney City Councils criteria. From an operational perspective, all guest behaviour will be supervised by hotel management and integrated security.

2.10 Crime Prevention Through Environmental Design

The Plan of Management is consistent with the principles of Crime Prevention Through Environmental Design (CPTED) by creating environmental and social conditions that:

- Maximise risk to offenders (increasing the likelihood of detection, challenge and apprehension);
- Maximise the effort required to commit crime (increasing the time, energy and resources required to commit crime);
- Minimise the actual and perceived benefits of crime (removing, minimising or concealing crime attractors and rewards); and
- Minimise excuse-making opportunities (removing condition that encourage/ facilitate rationalisation of inappropriate behaviour).

The safety and security issues addressed in this Plan of Management are consistent with current policies that ensure the quiet amenity of neighbouring properties is always maintained during the operation of the premises. All staff, as part of the induction process, are required to be familiar with this Plan of Management.

2.11 Noise

The hotel will be managed to minimise the potential of causing a nuisance, or an offensive noise as defined in the *Protection of the Environment Operations Act 1997* to adjoining properties or the public. The following measures will be implemented:

- The hotel will ensure senior management is aware of the operational consequences of the Plan of Management to ensure that it is consistently enforced.
- All staff, as part of the induction process, will be required to be familiar with this Plan of Management and will play an important part in maintaining a quiet ambience.
- Patrons of the hotel making any significant noise at sensitive times will be asked to reduce their volume and any customers behaving in an unsociable manner will be asked to moderate their behaviour.

- Additionally, the safety and security issues addressed in this Plan of Management have been devised to ensure the quiet amenity of neighbouring properties is always maintained during the operation of the premises.

Staff will be encouraged to minimise noise while on site and always report any anti-social behaviour. Reports of all noise complaints will be documented in a register and kept on site. Staff will be encouraged to ensure that customers behave in an appropriate manner whilst on the site and do not disturb the neighbourhood when exiting the premises late at night.

The premises will be operated in accordance with noise conditions imposed by local authority as part of any development approval as well as any requirements of the relevant licensing authority. All sound emissions and noise management practices will comply with Council's requirements, the Protection of the Environment (Operations) Act 1997 and NSW Office of Liquor, Gaming and Racing (OLGR).

Key initiatives to minimise noise on terraces during normal hours and after hours include;

- Management and staff intervention;
- Installation of noise locks on doors to the open areas;
- Noise limiting applications on sound systems and equipment;
- Passive Design noise barriers including screens and curtains.

2.12 Waste Management

All waste management will be in accordance with the Waste Management Plan submitted with the EIS. It is recommended that waste collection, storage and removal from the site is managed in accordance with the following principles:

- A waste receptacle will be provided in each hotel room for the temporary storage of waste. Space will be provisioned for a general waste receptacle and a recycling receptacle. Hotel cleaning staff will be responsible for the emptying of these receptacles daily and transporting waste to the hotel WSRA by janitor waste cart.
- General waste and recycling bins will be provided in each office for the hotel. Hotel cleaning staff will be responsible for the emptying of these bins daily and transporting waste to the hotel WSRA by janitor waste cart.
- The back-of-house areas of bar and dining areas will hold bins for the temporary storage of waste. Bins for general waste, recycling, and food waste at minimum will be provided to allow easier source separation for staff. Bins will be transferred to the hotel garbage room at minimum once daily for emptying and cleaning and transferred back to the back-of-house.
- Site management will co-ordinate with hotel event managers to ensure that functions are suitably serviced with bins, and that extra bin lifts are scheduled to meet temporary increases in waste generation onsite.
- All waste will be brought to the WSRA located on Level Basement 1 and will be used for the storage of empty and full general waste and recycling bins

Figure 3 demonstrates the flow of waste from unit generation through several steps.

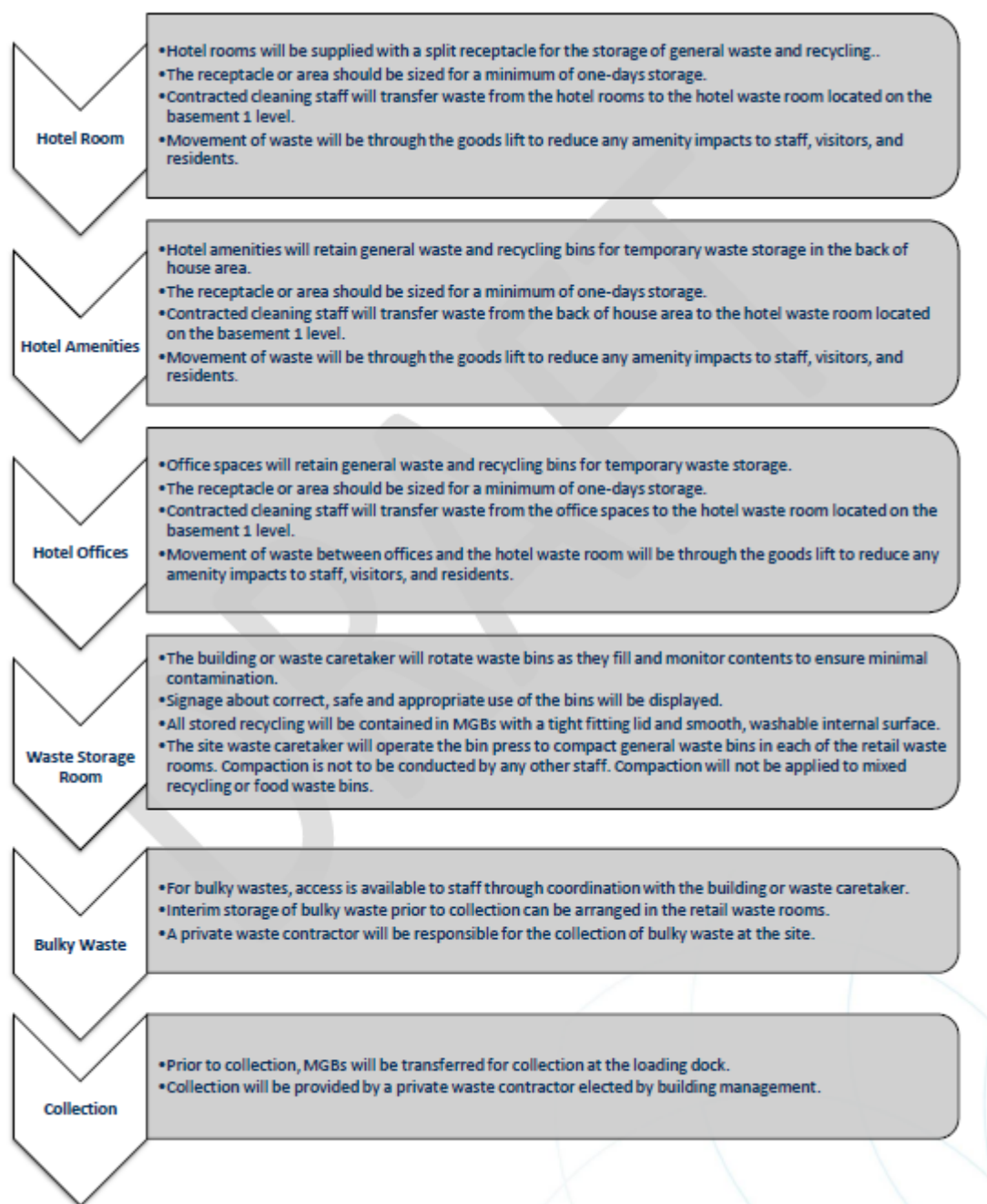


Figure 3: Hotel waste flow

MRA Consulting Group

2.13 Cleaning

Hotel staff will ensure as far as practical that the premises is kept in a clean and tidy condition both internally and externally to the extent of the building that is managed and controlled by the hotel. Cleaning of both internal and external areas of the hotel will be undertaken by cleaning staff.

2.14 Graffiti

The premises will comply with common policy in relation to all Graffiti. Any damage to property by way of Graffiti will be removed from the site within 24 hours of being noticed.

2.15 Money Handling

An independent security company will be employed to undertake all movement of cash to and from the premises. There will be no cash movements from the premises by the staff at any stage. There will be no movement of monies from the premises by Security Personnel at night. All appropriate safety alarms will be installed at the building including back to base security which involves the Intruder Alarm System being linked to the security company.

3.0 Security Management Plan

3.1 CCTV

The security and safety of employees and the general public are to be of top priority to the management of the premises. The hotel will have CCTV surveillance cameras in the premises in strategic places including the building entry points, hotel lobby, loading dock and common areas. This system has automated recording technology, longer video storage capacity and video motion detection.

All cameras will operate 24 hours a day. The surveillance tapes / videos should be kept for at least 1 month for viewing by the Police if required. The quality of the images filmed are to satisfy Police requirements.

Management will ensure the system is maintained and in good working order. Management are to ensure that the coverage is operated with due regards to the privacy and civil liberties of all persons within the development and in strict accordance with the *Privacy and Personal/Information Protection Act 1998*.

3.2 General Surveillance

The hotel's employees are encouraged to assist with passive surveillance of all areas of the development, particularly the café, bar and restaurant and reception areas by providing efficient reporting systems for any security or safety concerns.

Clear lines of sight and lighting will be provided within the lobby and at street level to activate the ground plane, encourage passive surveillance and deter anti-social or criminal behaviour.

The hotel is to undertake a risk assessment analysis on a continual basis to determine the need for security personnel in the hotel.

3.3 Lighting

External lighting will be provided around the building and building entries to enable clear vision and will be designed in such a manner to prevent concealment and shadowing. The standard of lighting will not only reduce the fear of crime in accordance with Australian lighting standards, but also serves to provide clear identification of activity using the high technology CCTV cameras proposed.

Broken light fixtures and bulbs within the premises will be replaced within 48 hours.

3.4 Restricted Areas

Access will be restricted particularly in relation to nominated "secure areas" such as the office and back of house areas. This will be achieved by the installation of security hardware (locks, etc.).

3.5 Signage

Clearly identifiable signage will be installed in and around the building to indicate which areas are open to guests and members of the public and which areas are restricted.

3.6 Space Management

Routine maintenance checks and reporting will be carried out by personnel employed at the hotel to ensure the property is maintained and to reduce the likelihood of crime or vandalism. Landscaping will be maintained in a

manner that communicates an alert and active presence. Furthermore, robust materials are proposed to be used where possible to mitigate against potential malicious damage. Any vandalism or graffiti should be repaired and removed promptly by staff or contractors.

3.7 Toilets

Common toilets for staff and guest use will be located at level one and will be clearly signed.

3.8 Landscaping

The site landscaping is designed to help integrate the built form into the site and surrounds. The proposed landscaping scheme avoids vegetation that impedes the effectiveness of outdoor lighting. It will be maintained regularly by an external landscape maintenance contractor to communicate an alert and active presence and maintain a high-quality appearance.

3.9 Guest and Patron Management for Bar Areas

The following principles are recommended as part of any future detailed Plan of Management adopted by the hotel to manage individual patrons and crowds:

- All staff are to be trained with regards to the obligations, practices and procedures of the Hotel with regards to Responsible Service of Alcohol.
- The hotel does not serve liquor to intoxicated patrons. As well, intoxicated patrons are not allowed to remain on the premises, and due to the nature of the area, this is, and will continue to be tightly controlled by hotel management.
- The hotel refuses entry to intoxicated persons coming from other venues in order to reduce incidences.
- All staff, as part of the induction process, are fully briefed on how they should address and caution potentially inebriated or unusually vocal customers in order to minimise the likelihood of disturbing the quiet and good order of the neighbourhood.
- Customers making any noise are asked to leave quietly and quickly and any customers loitering are asked to move on.
- Additionally, the safety and security issues addressed in this Plan of Management have been devised to ensure the quiet amenity of neighbouring properties is maintained at all times during the operation of the premises.
- Hotel employees are encouraged to assist with passive surveillance of all areas of the development. Staff will be encouraged to call their Supervisor or Manager if any difficulties arise to quickly "intercept" any potentially noisy, rowdy or abusive patrons to attempt to calm them down as much as possible as they leave.

3.10 Weapons

Weapons of any type, i.e. knives, firearms, etc., will not be permitted at any time, unless in the hands of authorised security personnel or Police.

3.11 Theft

If theft occurs involving a guest, every effort must be made to assist the guest in any way possible, i.e. forms, police report, telephone calls. It is recommended that all personal information is recorded on the Incident Report Form in case any items are recovered at a future time.

Incidents involving staff members must also be documented on the Incident Report Form and any necessary policy reports must be completed. A list of all items missing must be recorded.

The theft of any property on the premises must be reported to the police for insurance purposes. All thefts must be documented clearly and concisely on an Incident Report Form.

3.12 Antisocial Behaviour

The hotel should adopt a zero-tolerance approach to antisocial behaviour at the premises.

3.13 Complaints Handling

All staff members will undergo complaints training to ensure that they are skilled in being able to appropriately manage complaints or when they are required to be elevated to a Manager. Generally, all complaints will be dealt with by Managers.

Staff will be trained to handle complaints by teaching them the LAST process – Listen, Apologise, Solve and Thank.

Staff are trained to know how and when to turn over complaints to Managers.

As a basic course of procedure if a hotel guest or member of the public becomes irate and threatens someone, the following actions should be followed:

1. A Manager will be requested to address the guests concerns and take appropriate action to resolve the situation.
2. If the guest continues to behave in an unsatisfactory or threatening way the person will be asked to leave the premises.
3. If the person refuses, as a last resort, consider calling the police;
4. This incident or complaint would be required to be noted in the complaints register.

Complaints will be handled by management and staff at the hotel. Guests will also have the opportunity to escalate issues to head office.

3.14 Incident Reporting and Complaints Register

It is recommended that a register is to be kept, which identifies any incidents that may have occurred or complaints that are worth noting. The day, time and details of the incident/complaint are to be noted within the register. A copy of the register will be made available to the Police within 48 hours upon request if requested.

Staff must not resist a robbery and are required call the police after the person(s) has left the building, at which time doors are locked. The hotel must stop trading until emergency services arrive.

The entries within the incident/complaints register will be used as a basis for the review and amendment to this plan of management as required. A review of the incident/complaints register will be undertaken annually.

3.15 State Health & Safety Regulatory Authority

Any Notice / document / request that are raised by a State Health & Safety Regulatory Authority Inspector must be immediately communicated to the OHS Manager who will then ensure that all other appropriate personnel are informed. The OHS Manager will then develop an Action Plan / Actions with responsibilities to address the issue raised.

3.16 Consultation

China Centre Development are committed to ongoing consultation with adjoining property owners, Police and Council to foster a better understanding of relevant operational issues that may arise at the site and would be available to be contacted to discuss potential issues as they may arise.

Ongoing review of this document may be undertaken to ensure that the Plan of Management remains relevant to the operation of the Hotel and that issues that arise can be managed into the future.