



Transport

21 February 2011

Mr Chris Wilson  
Department of Planning  
GPO Box 39  
Sydney NSW 2001

**Attention: Ben Lusher**

Dear Mr Wilson,

**CityOne Part 3A Concept Plan proposed by Thakral Holdings Limited (MP09\_0076)**

This submission provides a formal response from Transport NSW, including Operating Entities, to the above Concept Plan application.

Given the importance of the Wynyard Precinct to Sydney's future economic and environmental wellbeing, Transport NSW is keen to see an exemplar development that adequately addresses access to all public transport modes and is integrated with the future expansion of Wynyard Station, bus interchange and surrounds.


Overall, subject to the matters raised in this submission, Transport NSW generally supports the Concept Plan. However, a number of matters are yet to be resolved and the current CityOne Concept Plan application, as documented in the Environmental Assessment Report, does not provide sufficient information on a range of issues. Robust conditions or terms of approval would be required to ensure that future Project Applications are appropriately formulated.

Attached to this cover letter are detailed comments on the CityOne Concept Plan Environmental Assessment Report that must be addressed in the Proponent's Submissions Report or, if required, Preferred Project Report.

Please note, the title and commercial arrangements for the use of land owned by RailCorp will need to be resolved to the satisfaction of Transport NSW and RailCorp prior to a decision on providing owner's consent and conditions. This issue will be the subject of separate correspondence.

If you require any additional information, please do not hesitate to contact David Hartmann, on 8202 2288, or Brendon Baker, on 8292 2845.

Regards,



Joanna Quilty  
**Deputy Director General**  
Transport Policy and Planning

## Overview

This submission has been coordinated by Transport NSW in consultation with relevant transport agencies. The proposed CityOne Concept Plan has significant implications for the Wynyard Precinct, including the adjacent CityRail Station, bus operations and the Barangaroo Pedestrian Link.

In reviewing the CityOne Environmental Assessment Report, it was noted that the documentation has inconsistencies and is limited in detail on significant issues. The Concept Plan proposal represents a very high level submission that would need to be backed up by numerous detailed on-site investigations to confirm and elaborate on the Concept Plan assumptions prior to the lodgement of any future Project Applications. This in turn would lead to specific recommendations and strategies for site activities and detail design criteria.

Thakral has made numerous approaches to Government to develop the Wynyard Precinct and a number of recent discussions have been undertaken. However, it is considered that the Environmental Assessment Report implies a level of agreement with Transport NSW (including RailCorp and State Transit Authority) beyond discussions to date.

Overall, subject to the matters raised in this submission, Transport NSW generally supports the Concept Plan. However, a number of matters are yet to be resolved and the current CityOne Concept Plan application, as documented in the Environmental Assessment Report, does not provide sufficient information on a range of issues. Robust conditions or terms of approval would be required to ensure that future Project Applications are appropriately formulated.

Critically, any Concept Plan approval must be subject to conditions or terms of approval that allow Transport NSW to investigate and confirm the potential public benefit to rail users, bus users and other pedestrians, such as:

*Prior to the lodgement of any future Project Applications, the Proponent must:*

- 1. initiate and complete an integrated design review process with Transport NSW;*
- 2. prepare a Project Scope Report that documents the outcomes of (1), above; and*
- 3. prepare and execute a Commercial Agreement with Transport NSW that confirms and documents the public benefit of the proposal.*

A Commercial Agreement could be supported by an agreed Voluntary Planning Agreement (addressing proposed contributions by the proponent).

It is considered that the outcomes of an integrated design review process and a mutually beneficial Commercial Agreement would make a significant contribution to the Wynyard Precinct. Key principles associated with the Wynyard Precinct will be further developed through stakeholder engagement and a Master Plan process, which is now underway. The key principles relate to:

1. Providing a 21st century transport hub at Wynyard that improves customer experience.
2. Ensuring high quality public domain.
3. Ensuring pedestrians are privileged with "through site links" and connectivity via new public entrances at sub surface and surface especially in an east west connection.
4. Realising the potential for a higher and better use for the existing infrastructure, including the tram tunnels thus interacting with other CBD initiatives such as light rail.
5. Repairing, enhancing and re-connecting Wynyard Park back to the CBD.
6. Collaboration with all adjoining property owners to facilitate a robust economically feasible and sustainable environment within the precinct.
7. Safeguarding "asset protection zones" covering core transport areas and essential services.

It is anticipated that an integrated design at this location would also support the Sydney City Centre Access Plan. The Sydney City Centre Access Plan is a major study currently being undertaken by Transport NSW. It will identify short, medium and long term strategies to improve the accessibility and connectivity of the CBD through an integrated transport network involving heavy rail, buses, light rail, ferry, taxi and pedestrian and cycling links. In particular, the Sydney City Centre Access Plan will consider the Wynyard Precinct as a key CBD transport hub and its role as a major bus interchange and rail station. The Sydney City Centre Access Plan will be complete later in 2011.

Transport NSW is also currently undertaking a number of critical initiatives in the Wynyard Precinct to improve bus flows during the peak.

### ***Consideration of strategic benefit and public benefit***

It is Transport NSW's view that the Concept Plan has the potential to provide public benefits to rail users, bus users and other pedestrians. The proposed CityOne development is located in a unique position adjacent to Wynyard Station and it is therefore in the public's interest to redevelop the site, albeit in a considered and reasonable manner which does not cause unacceptable problems elsewhere.

The Environmental Assessment Report indicates that the CityOne development "is fully supported by its strategic planning context both in terms of delivering key public transport outcomes for Sydney and in ensuring the ongoing growth and role of Sydney as a globally competitive and innovative city" (page 10).

Whilst public benefits of the proposal are acknowledged, it is considered that the Environmental Assessment Report generally overstates the nature and extent of these benefits or does not provide sufficient evidence to demonstrate the nature and extent of the public benefit. In considering the public benefit of the proposal, the following items are discussed (consistent with the Environmental Assessment Report):

1. Improvement works by Proponent – East of the eastern kerb of Carrington Street
2. Improvement works by Transport NSW – Unpaid area west of Carrington Street
3. Monetary Contribution towards Station Improvements by RailCorp – Paid Area
4. Integration with bus interchange and surrounding public domain

#### **1. Improvement works by Proponent – East of the eastern kerb of Carrington Street**

These works would provide a material benefit to public transport customers by providing improved amenity for customers using the eastern accessways to Wynyard Station and an improved station 'address' from George Street. The detailed design of these works must be subject to further consideration, including an integrated design review process involving both the Proponent and Transport NSW. This review process would then inform future Project Applications.

Notwithstanding, it is important that the material benefit to public transport customers is accurately portrayed.

The statement in the Environmental Assessment Report that Wynyard Station is currently at capacity (p115) is incorrect. Similarly, the claim that the 'concourse design proposed effectively doubles the existing station capacity' (page 9) is also not justifiable.

The key factors determining the capacity of Wynyard Station are the number of platforms and operational capacity of rail lines passing through the station. While the CityOne proposal would provide improved amenity for the eastern accessways to the station, the development would have only a minor impact on station capacity.

It is also noted that, whilst the Environmental Assessment Report refers to the existing station already operating at Fruin Level of Service D or E for extended periods (page 17), the unpaid concourse between George Street and Carrington Street (i.e. the area that would be upgraded by the proposal) are currently operating at a much better Fruin Level of Service A or B.

#### **2. Improvement works by Transport NSW – Unpaid area west of Carrington Street**

It is acknowledged that the CityOne proposal would be able to integrate with future upgrades of Wynyard Station west of Carrington Street. However, the significant upgrades to the unpaid areas of Wynyard Station, which are envisaged by the Environmental Assessment, are not part of Thakral's Concept Plan.

In fact, the Environmental Assessment Report clearly states that the Concept Plan does not propose any conceptual design or physical works west of Carrington Street.

Therefore, Transport NSW does not concur with the statement that the CityOne proposal would facilitate major works or major redevelopment of Wynyard Station. Nor would the proposed Concept Plan in itself deliver a world class transport system.

Improvements to the unpaid areas of Wynyard Station west of Carrington Street would be resolved and determined by Transport NSW and do not form an integral component of Thakral's proposed CityOne development. Interface issues would need to be resolved prior to the delivery of the project (design, levels, construction staging).

Improvements to the paid areas of Wynyard Station would be resolved and determined by Transport NSW and do not form an integral component of Thakral's proposed CityOne development.

### **3. Monetary Contribution towards Station improvements by RailCorp – Paid Area**

A monetary contribution towards public amenities and infrastructure improvements arising in connection with the development, including the Wynyard Station improvements, is considered to be appropriate. There is a need to integrate any development at the CityOne site with the paid and unpaid areas of Wynyard Station. In addition, the CityOne development proposes significant Floor Space Area ( $85,000\text{m}^2$ ) gained by utilising the area west of Carrington Street as part of the site area.

It is noted that, for a site area of  $4,032\text{m}^2$  (the area of the CityOne development excluding the area west of Carrington Street) the maximum FSA that would comply with the relevant Floor Space Ratio within local planning instruments would be:

- a)  $50,400\text{m}^2$  (to comply with a FSR of 12.5:1); or
- b)  $32,256\text{m}^2$  (to comply with a FSR of 8:1).

The amount of an appropriate monetary contribution towards necessary public amenities and infrastructure improvements, including any future works at Wynyard Station, has not been agreed with Transport NSW. However, it is acknowledged that the Concept Plan includes a contribution in principle, albeit not quantified to date. Transport NSW would support a quantified contribution in the form of a Commercial Agreement and/or a Voluntary Planning Agreement that is fully documented in advance of, or as part of, future Project Applications. A component of the monetary contribution should be commensurate with the increase in Floor Space Area gained by utilising the area west of Carrington Street as part of the site area.

References in the Environmental Assessment Report to fire and life safety in the discussion of a potential monetary contribution are not relevant to the assessment of public benefit. A provision of funds by Thakral would not resolve these issues. Rather, fire and life safety issues must be resolved through an integrated design and systems approach covering the entire Wynyard Precinct to the satisfaction of Transport NSW and RailCorp.

### **4. Integration with bus interchange and surrounding public domain**

The CityOne Concept Plan would deliver a range of public domain improvements, particularly east of Carrington Street. It is important that future Project Applications clearly document these improvements.

The Concept Plan lacks detail regarding amenity, service operations, access and infrastructure for bus users. It is important that future Project Applications clearly document these improvements.

Improvements to the public domain areas in Wynyard Park would be resolved and determined by Transport NSW and do not form an integral component of Thakral's proposed CityOne development.

The Concept Plan may provide an opportunity to improve the Wynyard Precinct for bus operations and bus users in the long term. It is important that future Project Applications

clearly document any opportunities in this regard. Transport NSW must endorse any proposed bus strategy outlined in future Project Applications.

### ***The proposed Concept Plan***

The proposed CityOne development is located in a unique position adjacent to Wynyard Station. Therefore, any development would influence both the paid and unpaid areas of the Station and Wynyard Park. Due to this influence, Transport NSW recognises that Thakral's Concept Plan site encompasses areas west of and including Carrington Street.

However, the potential scope of works to the unpaid concourse west of Carrington Street (p18) is not agreed by Transport NSW and should not be considered as part the Concept Plan. Transport NSW considers that the "envelope" west of Carrington Street represents no change to the existing situation. Further, the Concept Plan does not seek approval for the conceptual design or physical works west of and including Carrington Street.

Any approval of the Concept Plan would commit Transport NSW to capital works to address the interface between the proposed CityOne development and the unpaid areas of Wynyard Station, which have an unknown scope, cost and timing. This is particularly pertinent where preliminary concept designs are proposed at different levels to the existing unpaid areas. Therefore, all future Project Applications must resolve this design interface and provide certainty that capital works can be funded and delivered.

The concept design and construction staging presented in the Environmental Assessment Report and associated drawings are not acceptable to Transport NSW. The detailed design of the proposal requires considerable review and development. In particular, the proposed designs for the concourse, eastern entrance and use of Wynyard Lane can not be supported by Transport NSW. Fire and life safety issues also require significant review and development.

### **Concourse design**

The Environmental Assessment Report states that a report by Translawcom, provided by RailCorp in 2007, has been used extensively in the preparation of the concept designs and pedestrian modelling. The Translawcom report has been superseded by further work carried out by RailCorp and Transport NSW and does not reflect an agreed design for upgrading Wynyard Station. In particular, this work predates commitment to a Barangaroo Pedestrian Link that has considerable impacts on space management at Wynyard Station.

The Proponent would need to enter into further detailed design discussions with Transport NSW and RailCorp to ensure that the CityOne development is fully integrated with future Wynyard Station concourse designs.

The Environmental Assessment Report indicates that the CityOne development would "extend the functional life of Wynyard Station" (for example in the Executive Summary, and Strategic Justification sections). This statement (or words of similar intent) should be qualified in that the proposed Concept Plan only applies to the eastern accessway to Wynyard Station. The areas within Wynyard Station of most concern regarding pedestrian congestion would not be upgraded as part of the CityOne Concept Plan and

would in fact be undertaken by Transport NSW. Areas of key activity are the western accessway (with connections to Barangaroo) and the immediate station concourse.

#### **Performance specifications – eastern entrance**

Transport NSW has provided Thakral with provisional functional specifications for the eastern exits to Wynyard Station as follows:

*The width of the eastern accessways should be determined by modelling of pedestrian demand to 2060. Transport NSW's provisional functional specifications are that they must total no less than 20 metres and offer unimpeded pedestrian flows between the concourse and the street.*

It is important to note that pedestrian modeling must be carried out to determine the necessary exit widths to 2060 and to test the performance of the proposed accessways and vertical transport (escalators, stairs, lifts etc). The provisional 20m eastern exit width requirement is inclusive of the Hunter Connection exit, which is approximately 4m in width at its narrowest point, meaning that a minimum of 16m of unimpeded exit width to George Street must be provided.

The 20m exit width requirement must be via the most convenient route from the concourse to street level and must not be impeded by obstructions to pedestrian movement such as the pedestrian crossing of Wynyard Lane. This key design issue will need to be resolved to the satisfaction of Transport NSW as part of any Project Application.

In addition, it is unclear how users of the commercial building would gain access from the Wynyard Station concourse and how these pedestrian flows would be managed.

#### **Wynyard Lane**

The raising of Wynyard Lane and crossing points has impacts on pedestrian access and the resolution of this is not considered satisfactory. Pedestrians must be privileged over vehicles.

The current concept design indicates vertical transport from concourse to George Street level comprising a single pair of escalators and bank of stairs nearest to the George Street exit, with a less convenient alternative route via the Wynyard Lane crossing, which the Traffic Report suggests would be used by between 54 and 78 vehicles per hour in the AM peak. This does not satisfy Transport NSW's functional specifications for the eastern station accessways due to the obstruction of pedestrian flows by vehicles using Wynyard Lane. This key design issue will need to be resolved to the satisfaction of Transport NSW as part of any Project Application.

The current concept plan also proposes modification of ingress/egress points on Wynyard Lane, including creation of a road ramp at a gradient of 1:12. It is unclear whether the proposal implies that this ramp will be used solely for motor vehicle access. It is likely the lane would be informally used for pedestrian access unless clearly demarcated to the contrary. Consideration for accessibility compliance under the Disability Standards for Accessible Public Transport and the Building Code of Australia would need to be considered for this ramp.



**Fire and Life Safety**

The Environmental Assessment Report outlines the potential for improvement to fire and life safety within the Wynyard Station Precinct by focusing on issues within the Wynyard Station paid area. However, the Concept Plan should have also considered the requirements of emergency egress/access within the wider Wynyard Precinct to effectively demonstrate a whole-of-precinct fire and life safety approach.

The issues identified in Thakral's (draft) Fire & Life Safety Report and RailCorp's fire and life safety issues will need to be coordinated. RailCorp would require further analysis of fire and life safety issues prior to the finalisation of any future Project Applications to ensure an integrated fire and life safety system is implemented as part of the development.

Negotiation would also need to occur regarding the method of installation of fire and life safety systems, including smoke excavation. Direct involvement by Thakral may not be appropriate for any upgrade to fire and life safety systems of Wynyard Station.

The Fire and Life Safety Report focuses on Wynyard Station and not the proposed building development. It implies that the fire safety of the building relies on the fire safety in Wynyard Station, which should not be the case. Fire separation between the proposed building development, concourse and Wynyard Station needs to be addressed in a comprehensive revision of the Fire and Life Safety report.

**Construction staging**

The Concept Plan identifies an indicative schedule for the construction of the proposed commercial building and station concourse works.

Further consideration of construction staging is essential to ensure that construction of the proposed commercial building does not affect the safe and effective operation of Wynyard Station.

The proposed construction staging would involve significant modification to the current access path between George Street and Wynyard Station. During construction, compliant access must be maintained between George Street and Wynyard Station. As this access path forms a direct link from the street to the station, the Disability Standards for Accessible Public Transport should apply to the access path to ensure the Station remains accessible to the general population, including access for persons with a mobility impairment.

Future Project Applications must consider:

- a) the construction and completion of additional pedestrian capacity into the unpaid areas of Wynyard Station prior to demolition of the existing Thakral House and Menzies Hotel;
- b) mitigation measures to ensure safe and efficient pedestrian management during construction, with reference to public transport users and other pedestrians; vulnerable users, and the maintenance of pedestrian access routes with sufficient levels of service and priority. This should all be undertaken in consultation with Transport NSW;
- c) potential structural impacts on underground elements of Wynyard Station;
- d) how to maintain access and operations (deliveries, garbage removal,



- maintenance, 24 hour emergency access, etc) for RailCorp, Emergency Services and tenants via the existing goods lift and the former tram tunnels;
- e) mitigation measures to ensure efficient bus and taxi operations at reasonable levels of service, addressing the critical role Wynyard plays in the bus network, with reference to the cumulative impacts of construction / demolition, additional vehicles, traffic congestion, reduction of interchange capacity, impact on the road environment, pedestrian access as well as potential scenarios for managing bus services during construction. This should all be undertaken in consultation with State Transit and Transport NSW;
  - f) fire and life safety during construction;
  - g) stringent environmental management measures to control noise, dust and other potential impacts on pedestrians and tenants;
  - h) cumulative impacts of concurrent construction with the Barangaroo Pedestrian Link and the Western Express project.

Further, to address construction traffic issues, a number of standard Conditions of Approval should be applied to any future Project approval. Suggested Project Conditions of Approval (construction traffic) are provided in Attachment 2.

Transport NSW notes that it is a Government priority to deliver the Barangaroo Pedestrian Link. The Barangaroo Pedestrian Link is a Condition of Approval for the Barangaroo Stage 1 development, required to be completed prior to first occupancy, currently scheduled for Q1 2014. To achieve this completion date construction works for the Barangaroo Pedestrian Link must proceed ahead of significant construction works associated with the CityOne development.

The Environmental Assessment Report provides minimal details regarding construction traffic. It is acknowledged that a detailed construction traffic management plan would be prepared. This should form part of all future Project Applications.

### ***Operational integrity***

During any development of the Wynyard Precinct, critical infrastructure requirements would need to be considered, including station operability and management of critical infrastructure and systems. This will require detailed analysis and consultation with Transport NSW, RailCorp and State Transit Authority before the finalisation of any future CityOne Project Applications.

The Environmental Assessment Report makes repeated references to 'Major Work to Wynyard Station'. However, both 'major work' and 'Wynyard Station' are not clearly defined. The Environmental Assessment Report also identifies direct impacts upon areas outside the paid concourse. Any future Project Applications must clearly define work to be carried out in the larger Wynyard Precinct, recognising that such work may have discernible public impacts, including on bus operations.

The proposal covers land that RailCorp leases to other tenants. There are also tenants in the Hunter Arcade that may be impacted by the proposal directly or indirectly. Further detail needs to be provided to ensure RailCorp's existing tenants and other tenants are

not unreasonably impacted by the proposal.

RailCorp (and tenants) requires goods lift access between street level and the concourse during and post construction. Arrangements for the design of a new goods lift and interim access and storage arrangements during construction would need to be resolved to the satisfaction of RailCorp prior to the lodgement of any future Project Applications.

Access to freight deliveries and 24 hour (seven days a week) access for emergency services vehicles/equipment is also required (including alternatives to the existing RailCorp goods lift).

Transport NSW can not support the delivery times on Carrington Street and York Street proposed in the Environmental Assessment Report. Due to the high peak usage of the Wynyard Bus Interchange (both am and pm), deliveries would not be able to be accommodated during peak hours 6am – 9:30am and 3pm – 7pm.

A plan for the operational management of station accessways, including deliveries, out-of-hours operation and emergency warning and information systems would need to be prepared, to the satisfaction of RailCorp, as part of any future Project Application.

Potential acoustic and electrolysis impacts are identified in the Environmental Assessment Report. However, there is a lack of quantitative impact assessment.

It is noted that the document "Structural and Geotechnical Assessment on Rail Corridors", dated October 2010 and submitted by Arup mentions the possibility of blasting being used as a methodology for bulk excavation. RailCorp will not permit blasting in proximity to existing rail assets.

Prior to the lodgement of any Project Application for the construction of the proposed building/structures the Proponent is to provide RailCorp (for its endorsement) a detailed Structural and Geotechnical Assessment, addressing the issues itemised in RailCorp's document entitled "GEOTECHNICAL Structural Engineering Brief Final 2". In order to undertake this geotechnical assessment the Proponent may need to undertake the proposal in stages (for example, demolish the building) in order to have access to the site for geotechnical investigation.

Further, to address operational integrity issues, a number of standard Conditions of Approval should be applied to any future Project approval. Suggested Project Conditions of Approval (operational integrity) are provided in Attachment 1.

### ***Environmental assessment – transport***

The Concept Plan (and future Project Applications) has the potential to significantly impact transport operations and functions. Given this, the documentation lodged is not comprehensive or compelling. Areas such as bus operations, parking, pedestrians, traffic and safeguarding for future public transport infrastructure have not been comprehensively addressed. Assumptions about traffic generation and disruption have not accurately been assessed.

**Bus services and infrastructure**

The Environmental Assessment Report indicates that the development would have no impact on the operation of buses along George Street, Carrington Street or York Street. This claim is unsubstantiated.

Insufficient weight appears to be given to the scale of the bus task at the Wynyard Precinct. Buses operate in excess of 800 services and carry over 35,000 passengers to Wynyard every weekday between 7am and 10am. These figures do not take into consideration the passengers that use George Street at Wynyard, which is in excess of 400 trips and carry 18,000 passengers. It is also noted that Carrington Street is now operating bus services 24 hours a day, 7 days a week and is supplemented in both the AM and PM peaks with additional services.

The proposed CityOne development would have significant impacts on bus operations and would hinder State Transit's ability to provide the current level of service during construction. The impacts on timetables, additional bus costs, in service running and costs associated with delays of the construction work have not been considered. The following is of particular concern:

- Any closure of the footway in Carrington Street would be an unacceptable outcome for commuters queuing for bus services. The statement in Appendix D Traffic and Parking that the bus zone on Carrington Street is in limited use is incorrect. The potential removal of 22 metres of bus zone on Carrington Street needs to be reconsidered. Any loss of space would reduce interchange capacity, and therefore reduce the level of service provided for Wynyard bus services.
- State Transit has a Transit Shop (ticket seller, customer information), Wynyard Control Centre and staff facilities near the entrance to Wynyard Station on Carrington Street. These facilities are vital to the operations at Wynyard and their functions must be maintained during construction and restored in the final arrangement.
- The Environmental Assessment Report has proposed a raised priority pedestrian crossing on Carrington Street. Transport NSW can not endorse this design as it would not be a suitable location and would result in a significant loss of bus stand capacity and priority leaving the kerb which creates delays, not to mention the risk to customer comfort and safety with buses traveling through this area.

The above issues must be addressed in future Project Applications. Transport NSW must endorse any proposed bus strategy outlined in future Project Applications.

**Car parking**

The maximum car parking rates for the site are calculated in accordance with clause 65 of Sydney LEP 2005. The Concept Plan proposes 177 car parking spaces as part of the CityOne development, of which 96 spaces are attributable to the site area of Wynyard Station stratum owned by RailCorp beneath Carrington and York Streets.

It is unclear if the proposed 177 spaces are accommodated in the proposed design or rely on the continued use of the former tram tunnels as parking. The Concept Design drawings show two levels of car parking with a total of 44 spaces. Appendix D (Traffic,

Parking and Pedestrian Report) is inconsistent with the Environmental Assessment Report.

Little mention is made (or plans provided) in the Environmental Assessment Report or associated drawings of the existing car park and tram tunnels and the likely future use of these areas.

In the longer term, Transport NSW does not support the continued use of the former tram tunnels for car parking as it does not represent the highest and best use of this asset. Transport NSW considers that the former tram tunnels could in the future be used for railway purposes, including but not limited to passenger access, back-of-house facilities, station infrastructure/services, railway construction works and future light rail. Such uses would be determined as part of a larger Master Plan process and Sydney City Centre Access Plan to be undertaken by Transport NSW.

It is noted that for a site area of 4,032m<sup>2</sup> (the area of the CityOne development excluding the area west of Carrington Street) the maximum permissible number of car parking spaces that would comply with relevant local planning instruments would be 81.

The *2010 State Plan* includes significantly increased targets for public transport commute journeys to the CBD during the peak (up from 75% to 80%), while the *Metropolitan Plan* and the *Integrating Land Use and Transport – Guidelines for Planning and Development* support reduced parking rates in accessible locations. Road congestion in the Wynyard Precinct already affects the reliability of public transport services at peak times, and the introduction of additional traffic into Carrington and Margaret Streets is considered to be undesirable. The assertion in the Environmental Assessment that traffic would actually be reduced by the proposed development because of the loss of assumed taxi trips to the Menzies Hotel is considered questionable<sup>1</sup>.

The CityOne site at Wynyard Station is among the most highly accessible locations in Sydney, serviced directly by six rail lines and over 100 bus routes, and additional transport infrastructure planned as part of the Western Express City Relief Line and CBD Light Rail extension. Given the superior public transport accessibility of the site and existing congestion issues, Transport NSW does not support the realisation of additional car parking in the CityOne development afforded by the site area of Wynyard Station. Consistent with relevant local planning instruments, it is recommended that the maximum amount of tenant parking be reduced to 81 spaces (or less) to allow the creation of a genuinely transit-oriented commercial development.

The Environmental Assessment Report fails to mention specific parking provisions for disabled drivers. A proportion of the parking spaces should also be reassigned for car share and car pool use.

---

<sup>1</sup> Given the location of the Menzies Hotel above Wynyard Station it would be likely that a higher proportion of guests would use public transport than the hotels surveyed, particularly the Sofitel Wentworth (which the survey shows to have a much level of higher taxi use per room than the Four Seasons). Further, it is likely that taxi trips will make up a proportion of the trips to/from the 85,000m<sup>2</sup> CityOne commercial development, which would at least partly offset the loss of hotel taxi trips to the Menzies.

**Pedestrian flows**

As previously noted, the 20 metre nominal aperture for George Street contains provision for stairs and escalators and must be validated in any further Project Applications.

The Halcrow review of the Connell Wagner report (Appendix D) does not provide relevant information on pedestrian movement, predictions or flows. The conclusions drawn from this work on page 76 of the Environmental Assessment Report can not be substantiated.

The modeling undertaken by Connell Wagner in 2008 is based on previous station designs and demand forecasts. It is out of date and of limited relevance to the current Concept Plan application. The statements in the Environmental Assessment Report that draw from this report, for example that the concept plan envelope 'can facilitate a doubling in pedestrian capacity within the paid concourse area' and 'greatly reduce the duration of pedestrian journey times' (p17), should therefore not be afforded significant weight in the assessment process.

Further pedestrian modeling would be required based on updated station designs and demand forecasts to validate station exit width requirements and accessway designs to 2060. The modeling would also need to take into account pedestrian flows to/from the Barangaroo Pedestrian Link and proposed Western Express City Relief Line platforms. Pedestrian modeling would also need to take into account flows associated with bus operations, drop off / pick up, customer queuing and the interchange between transport modes.

It is noted that the proposed pedestrian connection through the CityOne site from George Street to Carrington Street could potentially provide an attractive route between bus stops in York/Carrington Streets and George Street. However the safe movement of pedestrians across Carrington Street in the vicinity of the through-site link would need to be addressed at the Project Application stage, as there is a high number of bus movements in Carrington Street. The Environmental Assessment Report has proposed a raised priority pedestrian crossing on Carrington Street. As previously noted, Transport NSW can not endorse this design. An at-grade pedestrian crossing would not provide an appropriate alternative solution as it would hinder bus services. In turn this would mean a reduction in the level of service to customers as well as the potential relocation of bus services to another area that has not been considered.

Materials, surfaces, lighting etc used in public station accessways must be coordinated with Transport NSW (and City of Sydney Council) to ensure that the Wynyard Precinct reads as a totality.

A signage strategy should be prepared as part of any Project Application, to the satisfaction of Transport NSW and consistent with Transport NSW's Interchange Guidelines. The strategy would identify Transport NSW requirements for branding, signage, passenger information and services within the CityOne accessways and entries to Wynyard Station.

**Traffic network (operational)**

Further information and detail is required on the potential impact on traffic flows, integration into the wider city environment, connections to buses, impacts on surrounding areas as well as the public transport network.

The Environmental Assessment Report proposes a number of full road closures around Wynyard. It is unclear how these will be managed, and further information is required.

Further justification should also be provided on the proposed reduction of traffic from the demolition of the Menzies Hotel, it is believed the report has overstated this reduction and current usage of the Menzies Hotel (see above<sup>1</sup>).

The traffic generation assumptions made for Carrington Street taxi movements are lower than they should be for a location next to the third busiest railway station and busiest bus interchange in Sydney. Instead of comparing to other hotels, the comparison should be made with an area such as Town Hall or Central Stations and their bus interchange areas.

### **Taxis**

Large commercial office developments generate the need for suitable taxi provision, especially during evening peaks. Specific permanent improvements to taxi ranks should be detailed in future Project Applications (in addition to the temporary improvements to be implemented during construction that are set out in section 7.2.4 of Appendix D).

### **Bicycles**

No reference is made to cycling improvements that could be delivered as part of the proposal, except the provision of bicycle parking. Future Project Applications must address bicycle connections from the site to the surrounding bicycle network and bicycle parking (as end of trip facilities for workers and for visitors) in the proposed development.

### **Travel demand management**

The Wynyard Precinct is among the most highly accessible locations in Sydney. However, the Environmental Assessment Report provides no commitment to a Workplace Travel Plan. Reference is made to "green commuter strategies", but this is not discussed in the accompanying sustainability summary (Appendix E).

As part of Workplace Travel Plans, NSW Government supports the following types of measures for major employment generators: bulk purchase of public transport tickets at a discount rate, discounts on bicycle equipment or purchasing bikes for rental by employees; raising awareness of public transport, walking or cycling options and providing guides and local maps. Further Workplace Travel Plan resources can be found at the Premier's Council for Active Living (PCAL) website:

[http://www.pcal.nsw.gov.au/workplace\\_travel\\_plan](http://www.pcal.nsw.gov.au/workplace_travel_plan)

A Workplace Travel Plan must be prepared for this proposal.

### **CBD Light Rail Extension**

The extension of light rail from Haymarket to Circular Quay is a key commitment in the Metropolitan Transport Plan. One option for the light rail extension is along George Street, which may present the opportunity for a light rail stop near Wynyard, in the vicinity of the CityOne development. The integration of a light rail stop into the precinct and pedestrian connections to rail and bus services through the CityOne site would therefore need to be addressed in the development of any project application for the site.

There is the potential that the CityOne site may also need to accommodate a light rail substation should George Street be selected as the preferred alignment for the CBD light rail extension.

A CBD light rail transport study looking at preferred alignments is currently underway, with the results to be included in the Sydney City Centre Access Plan, which will be complete later in 2011.

**Impact on proposed metro corridor**

The Environmental Assessment Report indicates that the proposed Concept Plan would not impede upon the Metro interim rail corridor (which is protected by the Infrastructure State Environmental Planning Policy 2007) or affect the future operations of the Metro project should it proceed. However, Appendix G (Structural and Geotechnical Assessment on Rail Corridor) provides no quantitative evidence to support this statement. Future Project Applications would need to demonstrate that the proposed development would not have unacceptable constructability or structural impacts on the protected Metro interim rail corridor.

***Environmental assessment – other environmental issues***

In addition to the transport issues identified above, there are a number of environmental considerations that potentially affect public transport customers, transport users (including road users) and the wider community. As Wynyard Park forms a major CBD bus interchange, maintaining the amenity and quality of the public domain in Wynyard Park and Carrington and York Streets (including sun access and minimising wind effects) is important to the travel experience of transport customers.

**Heritage**

The heritage section of the Environmental Assessment Report states that there would be an interpretation centre (p 99). However the spatial requirements or location of this facility are not indicated.

The detailed design of the development must describe the spatial requirements, location, layout and operations of a Heritage Interpretation Venue. The Heritage Interpretation Venue must be planned and designed by persons with expertise in heritage interpretation and be consistent with relevant Heritage Council of NSW publications and guidelines.

A heritage lift currently offers access to RailCorp and Thakral retail tenants between Wynyard Lane and the underground public access path between Carrington and George Streets. Further discussion is required over the future use/operation of this lift and potential impacts to tenants and heritage issues.

**Wind impact**

The development of a full environmental wind tunnel model study is required to confirm statements that the CityOne development would not cause any significant amount of additional wind flow to be induced in adjacent streets, Wynyard Park and Station entries. In the absence of this information at this stage, a commitment (or condition of approval) to meeting the criterion for walking comfort is required.



**Overshadowing**

The Environmental Assessment Report does not adequately assess potential overshadowing of Wynyard Park.

**Utilities**

The assessment in section 6.12 of the Environmental Assessment Report does not discuss RailCorp services for critical infrastructure, Station operations and servicing for RailCorp leaseholds.

Prior to the lodgement of any Project Application, the Proponent must undertake a Service Search to identify all rail services/utilities within and outside the Station complex, in consultation with RailCorp. The Proponent must obtain RailCorp's agreement to either the relocation or protection of services, at the Proponent's cost, prior to the lodgement of any future Project Applications. This is a critical requirement of all future Project Applications.

***Existing legal arrangements***

The existing Lease for the site requires landlord consent in respect of redevelopment including a "Comprehensive Redevelopment". The Landlord's consent may include the imposition of construction conditions. This submission and the conditions set out in it are not approval of any sort under the Lease for any redevelopment or any application for a consent/approval for redevelopment and do not limit the range of conditions that may be imposed on such an approval. Prior to obtaining project approvals and prior to commencing any works, the developer must comply with the terms of the lease and any other agreements that relate to the use or redevelopment of the land and must obtain agreement to the proposed removal of the Wynyard Ramps.

The Lease arrangements include provision for payment of certain moneys in connection with comprehensive redevelopments and for adjustment of rents in certain redevelopment scenarios. Nothing in this letter nor any consent to the making of any application is a limitation, waiver or fetter on RailCorp's rights under those arrangements.

The Wynyard ramps are not part of the Leased premises. Agreement on the acquisition of and use of the Wynyard ramps must be separately obtained from RailCorp.

This letter, any other submissions or correspondence nor any consent of any Transport NSW entity or RailCorp to the making of any applications is in any way an agreement on, or consent to, the delivery of any redevelopment or to be taken as limiting, waiving or fettering the discretions, powers, rights of RailCorp or any other agency under the lease or otherwise. The legal arrangements for the redevelopment must be separately agreed.

***Minor errors, misdescriptions or miscalculations***

In the coordinated review of the CityOne Environmental Assessment Report, it was noted that the documentation is inconsistent, with errors contained within Appendices. For example, in some documents the car park in the former tram tunnels is stated as being removed whilst in the traffic report it is noted as remaining. Many drawings are also inconsistent with other drawings and the accompanying text. For example, some

drawings show new egress points within Wynyard Park; other drawings show a large envelope over the park; and representations of the Barangaroo Pedestrian Link are incorrect.

A number of minor errors, misdescriptions or miscalculations were identified in the Environmental Assessment Report, including (but not limited to):

- The "development envelope" over Wynyard Park is shown incorrectly in many of the drawings. Many of the appendices refer to entrances within Wynyard Park and a "Wynyard Park canopy", neither of which are part of the proposal.
- Site areas for the Concept Plan are inconsistently cited, particularly comparing Table 2 and section 6.3.
- The 2010-2015 Memorandum of Understanding (MoU) between the NSW State Government and City of Sydney Council was prepared in 2010, not 2008.
- Some of the completion dates for Metropolitan Transport Plan projects are incorrectly cited.
- According to published RailCorp data, Wynyard Station handles approximately 22,000 passenger movements in the AM peak 1 hour period and approximately 41,000 in the AM peak 3.5 hour period, not 24,000 as stated in section 2.0 of the Environmental Assessment Report.
- The footnote reference on page 9 to a Connell Wagner Report could not be found at Appendix I (nor any other Appendix provided).
- Within the Heritage Impact Statement (Appendix H), the Statement of Significance for the Former Tram Tunnels (p35) is cut short as an apparent oversight. The statement should conclude with 'The tunnels were constructed using engineering techniques that were at the forefront of civil engineering for the period.'

### ***Attachment 1 – Suggested Project Conditions of Approval (operational integrity)***

To address operational integrity issues, a number of standard Conditions of Approval should be applied to any future Project approval.

1. No blasting shall take place without the written approval of RailCorp.
2. An Acoustic Report, which analyses both the impact of the works (vibration in particular) on existing rail infrastructure and also the impact of rail operations on the completed project, must be prepared and submitted to RailCorp for review. The recommendations of the Acoustic Report must be implemented.
3. An Electrolysis Report must be prepared and submitted to RailCorp for review. The recommendations of the Electrolysis Report must be implemented.
4. Temporary diversions of pedestrian traffic to and from Wynyard Station must be negotiated and approved by RailCorp prior to implementation.
5. Details of hoardings at street level must be provided to RailCorp and State Transit Authority for review, particularly if any penetrations of the pavement or ground is proposed.
6. Dilapidation surveys must be prepared at various stages including (i) Initial baseline data prior to any works commencing, (ii) Completion of demolition and prior to commencement of excavation, (iii) Completion of excavation and prior to commencement of construction, (iv) Completion of Construction, (v) Completion of defects period at least 12 months following completion, (vi) at any other time as

- reasonably deemed necessary by RailCorp.
7. Details of the proposed demolition methodology and Safe Work Method Statements must be submitted to RailCorp for review at least one month prior to demolition (including acoustic testing of "Drop Zones" to prevent detrimental impact on nearby infrastructure).
  8. Details of proposed excavation methodology and Safe Work Method Statements must be submitted to RailCorp for review at least one month prior to excavation (including breakup and removal of material as well as strategies for shoring the sides of the excavation (particularly if anchors are proposed) and monitoring of ground movements such as installation of Inclinometers etc. and vibration monitoring).
  9. Details of proposed construction methodology, including monitoring processes, and Safe Work Method Statements must be submitted to RailCorp for review at least one month prior to construction. The construction methodology must include relevant crane diagrams indicating type, citing and arc of travel details.
  10. At least one month prior to construction, the Proponent must complete a Rail Safety Management Plan in line with relevant guidelines.
  11. A Project Delivery Agreement must be entered into between the Proponent and RailCorp, which will include RailCorp's requirements with respect to the development (for example: staging, insurance, design reviews, pedestrian access, operational interfaces, indemnities, payment of all costs including compensation to tenants and loss of revenue associated with the development, emergency access procedures, fire safety, interfaces with tenancies and provision of security for obligations of the Proponent under the Agreement).
  12. All Traffic Management Plans and/or Traffic Control Plans must be submitted to the RTA and State Transit Authority for review at least one month prior to traffic changes to allow sufficient time to make temporary bus service changes and notify bus passengers.

### ***Attachment 2 – Suggested Project Conditions of Approval (construction traffic)***

To address construction traffic issues, a number of standard Conditions of Approval should be applied to any future Project approval.

1. The size of trucks proposed to access the site must comply with the provisions of Clause 300-3 of the Road Rules in terms of lengthy vehicle restrictions. The size of trucks accessing the site must be size-limited to rigid single-tray trucks for spoil removal.
2. To minimise impacts on public transport, trucks must not be permitted to use York Street or Clarence Street to access the development site between 6am to 10am and 2pm to 8pm Monday to Friday, unless otherwise agreed to by State Transit Authority and RTA.
3. Personnel using stop/slow signage are not permitted in York Street, Wynyard Street, Carrington Street or Margaret Street on weekdays between the hours of 6am to 10am and 2pm to 8pm, unless otherwise agreed to by State Transit Authority and RTA.
4. Construction truck movements must be staged and co-ordinated to prevent trucks circling CBD streets whilst awaiting access to site. There should be holding areas outside the CBD or sufficient space within the site to store trucks and heavy vehicles.
5. Between 6:00 to 9:00 and 15:00 to 20:00 there must be no reduction in the total space

- allocated to buses in the Wynyard Precinct. Any additional temporary bus layover areas must be in close proximity to the current bus departure areas and/or to any new temporary departure areas and have a fast and direct access to the pickup areas.
6. The Proponent must investigate the use of the Warringah Freeway Bus Layover area as a marshalling area for construction vehicles. This would require the agreement of the RTA, Hillsbus and State Transit. No construction vehicles would be able to use the facility between approximately 14:30 and 19:00 Mon-Fri.
  7. A Road Occupancy Licence shall be obtained from the Transport Management Centre for any works that impact on traffic flows as a result of proposed construction zones and temporary road/lane closures.
  8. In the event of works which require the use of cranes or other construction vehicles which occupy the road reserve, approval of Council and the NSW Police under Section 186 of the Law Enforcement Power and Responsibilities Act is required.
  9. Any temporary removal of Bus Zones during construction must have the approval of State Transit Authority.
  10. Any temporary removal of Taxi Zones during construction must have the acceptance of the Taxi Council.
  11. No bus stops or bus layover may be used as construction/work zones, unless otherwise agreed to by State Transit Authority and RTA.
  12. Any reduction in lane width, number of lanes and traffic capacity in Carrington Street must consider the swept path of buses leaving bus stops, passing buses and should not unduly impact bus operations.
  13. Any footpath closures resulting from the installation of hoardings on Carrington Street must not result in either reduced pedestrian access to bus stops or reduced bus capacity within the Wynyard Interchange.
  14. The Proponent shall be responsible for all public utility adjustments/relocation works, necessitated by demolition and construction works and as required by the various public utility authorities and/or their agents.
  15. All works and regulatory signposting associated with the proposed development are to be at no cost to the RTA.