SUPPLEMENTARY TRAFFIC REPORT

REF: N163791

DATE: 1 April 2021

TOGA
Level 5, 45 Jones Street
Ultimo NSW 2007

Attention: Mr. David McLaren (Development Manager)

Dear David,

RE: 2 & 8A LEE STREET HAYMARKET (ADINA CENTRAL) – RESPONSE TO SUBMISSIONS

TOGA Group (TOGA) is a long-term Crown leaseholder of the Adina Apartment Hotel and adjacent Henry Deane Plaza (the site), identified as Block C within the Western Gateway sub-precinct of the Central Station State Significant Precinct.

TOGA is proposing to redevelop their land holdings in the western gateway sub-precinct (referred herein as western sub-precinct) immediately adjoining Central Station, for a mixed-use development including a world-class hotel, technology hub and high-quality retail floorspace (maximum total 43,000 square metres GFA across Block C).

This letter has been prepared in response to submissions received on the rezoning application to the Department of Planning Industry and Environment (DPIE) for the redevelopment of Block C within the western sub-precinct. This letter should be read in conjunction with the Transport Assessment[1] prepared by GTA Consultants to accompany the rezoning application.

Submissions received and reviewed were from City of Sydney Council (dated 8 February 2021) and Savills, on behalf of Frasers Property Australia and Dexus Funds Management Limited (dated 5 February 2021). *The Department of Planning, Industry and Environment (DPIE) Submissions Summary* report has also been referenced as part of this response.

The relevant traffic and transport matters from the submissions have been reproduced in *italics* in Attachments 1 and 2, together with detailed responses.

I trust this appropriately responds to the submissions. Should you have any questions or require any further information, please do not hesitate to contact me on (02) 8448 1800.

Yours sincerely

GTA CONSULTANTS

Rhys Hazell – Director

Encl.
Attachment 1 – Response to Council Submission
Attachment 2 – Response to Savills Submission

[1] GTA Consultants, Adina Central Planning Proposal, 2 and 8a Lee Street, Haymarket dated 25 November 2020.

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ATTACHMENT 1

Response to City of Sydney Submission

The study has not estimated service vehicle number, size and coach/bus and drop off /pick up vehicles number. It has not provided traffic impact from this development to the adjacent network. The planning framework must include measures to service the developments with shared loading onsite without impact the public domain and pedestrian movements.

Loading

Section 4.4.2 of the Transport Assessment indicates that the loading dock as per the reference design (included within the FJMT Urban Design Report) could accommodate at least five service vehicles at any one time. This includes a combination of vans/ utes, small rigid vehicles and medium rigid vehicles. The design has considered both interim access arrangements either via the existing Right of Way north of the site or via the ultimate solution of a consolidated access at the southern end of the precinct. The assessment includes duration of stay information and turnover efficiency to form part of a dock management system. With an anticipated average 30-minute duration of stay and a 12-hour daily operation, the loading dock could accommodate up to 10 service vehicles in any peak hour and up to 120 vehicles across the day.

The anticipated demand associated with deliveries completed as part of the Transport Assessment confirmed that the proposed loading provision is appropriate for the proposed land uses. This was based on a detailed first principles assessment to appreciate the real or 'practical' loading demands, the details of which will be included in a DA design. In assessing current Adina Apartment Hotel service vehicle demands, together with commercial tenancy and specialty retail demands, the provision of between five and six dedicated loading bays on the site is both practical and supported. Overall, an appropriate level of detail has been documented with respect to service vehicle demands as part of the rezoning application.

A loading dock management system would be implemented to ensure operational efficiency and practical day to day use. This is common for such developments in CBD locations and ensures appropriate site operation with minimal impacts. The interim basement layout would be removed should Fraser/ Dexus site be redeveloped. In such case, an ultimate consolidated shared access arrangement for the precinct would be created via the existing access adjacent to the Lee Street/ Little Regent Street intersection. Vehicles would remain on the southern periphery of the precinct, well removed from the highly pedestrianised areas.

Coach/ bus and drop-off/ pick-up

Precise coach and bus demand was not specifically forecast as part of the rezoning application Transport Assessment. A more defined assessment will accompany future DA's, with current demand forecasting available from the Adina Apartment Hotel. It is expected that the demand will be low (around one to two coaches per day) which can readily accommodated within any drop-off/ pick-up zone and appropriately managed through a Plan of Management. CBD hotels have and continue to be afforded use of such on-street facilities for day to day activity (e.g. QT Sydney, Little National Hotel and A by Adina).

Section 4.5.1 of the Transport Assessment estimates that the 28 vehicle trips generated by the proposal will be car passenger trips (private, taxi and rideshare). This equates to about one vehicle every two minutes on the assumption that all these trips occur in a single peak hour. Such volumes can also be readily accommodated within any drop-off/ pick-up zone. It is also noted that other taxi ranks and established collection points have long functioned well in and around Central Station, most of which will continue to occur, even in the event that Lee Street is closed to vehicles in the future.

Adjacent Network Impacts

A cumulative traffic generation is included in Section 4.5.2 of the Transport Assessment and details traffic associated with the western sub-precinct. The results outlined in the Transport Assessment demonstrate that a development of this scale and general land use proportion can be facilitated without unreasonable adverse impact on the local traffic network.

The Transport Assessment determined that 140 trips of 420 trips would enter or exit the combined site basements and these will not all constitute 'new trips' given the western sub-precinct already generates some level of traffic activity. Such traffic generation equates to one vehicle trip every 25 to 30 seconds. In addition, it is noted that some 4,000 to 5,000 vehicles currently travel through the George Street/ Pitt Street intersection (as detailed in Section 4.5.3 of the Transport Assessment) with the precinct development traffic likely accounting for less than one percent of total traffic through this intersection. Therefore, such volumes are not expected to impact the operation of any interim or consolidated access arrangements, or the surrounding road network more broadly (as detailed further below).

The following documents need to be consulted and implemented to any future proposal on this site (in addition to the documents that are listed in GTA's report).

- *City of Sydney Cycling Strategy and Action Plan 2018-2030.*
- *City of Sydney Walking Strategy and Action Plan 2015-2030.*
- *Relevant Internal studies such as (some studies could be confidential; please check before you send those to the applicant)*
- *Pentelic Advisory's Preliminary Transport Context Analysis provides a basis of current and future access needs of the site.*
- *Camperdown Ultimo Collaboration Precinct*
- *Camperdown-Ultimo Place Strategy*

The documents listed above have been reviewed and summarised in Section 2.2 of the Transport Assessment. GTA requested the CoS Walking Strategy and Action Plan from Council, however such document was not available at the time of submission. All documents will be consulted and implemented as part of any future DA on the site.

The City does not support the proposal to use the proposed carparking rates in this location, which has the highest level of access to public transport. The City recommends zero commuter car parking on site.

While this comment is noted and the points made recognised, application of the City of Sydney maximum parking rates as defined in LEP 2012 is permissible as part of the proposed development. It is also recognised that the LEP parking rates are (suitably) low when compared with other metropolitan CBD locations in LGAs across metropolitan Sydney.

The proposal includes equal to or less than the maximum LEP requirement. Parking can be provided without adversely affecting access arrangements, loading dock provision or heritage items, and the final quantum of parking will remain compliant with the maximum LEP requirement. The final configuration (including car park layout, end of trip facilities and services) and parking supply will be confirmed as part of any future DA's.

The City's interest in Central Station is for the long term, and the design and planning for the precincts needs to reflect this long horizon. The proposal must therefore not be limited to only guiding the development's direct footprint in the short-term but also its wider impact on the precinct in the long-term.

This comment is noted and agreed. The proposal for the site has always addressed the surrounding developments that comprise the western sub-precinct, and how these relate with Central Station and planned redevelopment, including pedestrian priority, open space/ public domain and permeability generally. This will ensure quality outcomes and enhance the pedestrian experience in a key precinct over both the short-term and long-term and also align with the Public Realm Strategy prepared by TfNSW. Ongoing stakeholder consultation and design coordination (with Atlassian and DEXUS/ Frasers) will be key as part of any future DA's.

TfNSW and City of Sydney have been doing significant work to understand the future opportunities and vision for the Central Precinct.

- *The future layout of Lee Street is likely to deprioritise or be closed to vehicle movement.*
- *The future layout of Parramatta Road is likely to reallocate several lanes from vehicles to people and place.*

The proposal suggests the bus/taxi drop off will be on Lee Street in front of the site which does not align with the above vision. Moreover, Sydney DCP requires drop/off pick up locations to be located within the site. Any future proposal will have to comply with these requirements.

Vehicle access and associated traffic modelling should include all future potential road closures.

The applicant is aware of the broader planning intent in and around Railway Square, Parramatta Road and the western Central Station forecourt. This includes the potential to close Lee Street at Railway Square.

It is currently difficult to definitively include such guiding principles on what may or may not occur in the Central Precinct over the medium to long term as part of planning for the site, however this will be considered as part of any future DA's as guiding principles become available. Clearly the application relies on both interim and final solution access arrangements, with the ultimate solution including consolidated site access for the western sub-precinct through Block B at the southern end of the precinct (near Little Regent Street). This strategy navigates as best possible, the potential closure of Lee Street and ensures equitable long term solutions generally.

Specific site constraints and the overriding need to facilitate expansive public domain space in the western sub-precinct are key to limiting the site's ability to practically accommodate on-site drop-off/ pick-up activity. Specific inhibitors include existing heritage items, the planned Western Walk entrance to Central Station and the north-south corridor east of the site in the immediate vicinity. Strategies to minimise travel by vehicles are also key. Given such constraints and desired design outcomes, some level of drop-off/ pick-up activity along the Lee Street frontage is practical (should Lee Street remain open and/ or with traffic calming measures in place). Detailed investigations as part of future DA's will also consider any such closure of Lee Street and merit of a consolidated drop-off/ pick-up zone within the bounds of the consolidated sites, whilst ensuring the principles included within the Public Realm Strategy are realised. Sydney CBD includes an abundance of commercial properties that rely on on-street drop-off/ pick-up activity with CBD hotels also afforded use of such on-street day to day activity (e.g. QT Sydney, Little National Hotel and A by Adina).

The assessment completed to date includes a person-based trip assessment that considers all key modes of transport. With consideration to the available on-site parking, and as detailed in Section 4.5.2 of the Transport Assessment, it was determined that some 35 of the estimated 85 vehicle trips will park in the basement car park during the peak hour, with the remainder being dropped-off/ picked-up, or park off-site.

The applicant will work with Atlassian and Dexus/ Frasers to complete cumulative transport modelling for the agreed ultimate access arrangements for the western sub-precinct, and with consideration to any known

modifications to Lee Street. Such modelling will occur as part of any future DA's at such time when additional detailed spatial and traffic/ service vehicle information is known and agreed.

The Transport Assessment for Block B, prepared by Arup, included traffic modelling of the Lee Street/ Regent Street intersection that considered the increase in loading/ servicing requirements for the precinct (including the Adina site) and assumed on-site car parking will remain similar to existing.

The results of the modelling suggests that the intersection would continue to operate satisfactorily at Level of Service B for the ultimate scenario, with only minor increases in queuing and capacity. Therefore, any minor increase in traffic resulting from any changes to the final on-site parking supply across the precinct can be accommodated on the surrounding local road network.

The proposal is to strictly comply with section 7.8 of DCP 2012 for loading and service vehicle parking spaces and to include this in the Design Guide.

The DCP 2012 requirements for loading and service vehicle activity is considered excessive for mixed-use developments in constrained CBD environments. DCP 2012 states "*for mixed use developments, the total number of service vehicle spaces is to be calculated on a pro rata basis of spaces required for the relative proportions of different uses within the building*".

"*The total requirement identified in [Table 1] above may be reduced for developments with GFAs in excess of 50,000sqm where it can be demonstrated to the satisfaction of the consent authority that*:

(a) the proposed uses are complementary in terms of servicing demand; and

(b) at least one space per tenancy for business owners is provided."

DCP 2012 is not able to contemplate an empirical assessment of loading demand however provision of 21 loading bays for a site in this location is clearly not appropriate. As stated above, the proposed uses are complementary, and practical shared use of the loading bays under a dock management system is both appropriate and preferred. As discussed, a detailed first principles assessment to appreciate the real or 'practical' loading demand of the proposal has been completed post submission and will be further developed and verified during the preparation of any future DA's. Overall provision of between five and six loading bays is practical and supported, and aligns with other key Sydney CBD sites where spatial areas are constrained and operational efficiencies have been practically implemented.

The proposal is to meet Council's requirements of section 3.11.13 of the DCP for waste collection. Note that, waste collection vehicles are usually larger than an MRV.

Ongoing design development has considered truck access for vehicles up to 8.8m medium rigid trucks. Further design development will occur in coordination with Atlassian and Dexus/ Frasers. Given the absence of residential apartments, waste collection will be via private contractors, which aligns with other developments in Sydney CBD, with a variety of vehicle sizes and capacities able to be utilised and tailored to specific site access requirements. Naturally, medium rigid trucks form part of vehicle fleets and can be used for waste collection.

Any future proposal to this site must comply with Council DCP 2012 Clause 3.11.3 and relevant Australian Standard AS 2890.6:2015 and provide adequate bicycle parking and end of trip facilities.

Section 4.4.1 of the Transport Assessment details the DCP 2012 requirements for bicycle parking and end of trip facilities. Also contemplated is bicycle parking and end of trip facilities based on the person trips

assessment, which suggests significantly lower demand as a result of the known 80 per cent of trips by train or bus. The ultimate mix of bicycle parking, lockers and shower and change room facilities should be driven by exemplar developments and known use of facilities.

Further design development as part of any future DA's will incorporate such facilities within basement for staff and long-stay users, with short-stay visitor demand accommodated within the expansive public domain across the western sub-precinct generally.

ATTACHMENT 2

Response to Savills Submission on behalf of DEXUS/ Frasers

The Consortium notes the Block C Rezoning Proposal will ultimately be reliant on vehicle access through the Central Place Sydney ramp to Lee Street. This is consistent with the TfNSW Transport Requirements and is necessary to unlock the optimal pedestrian outcome for the reinvigorated Western Walk entrance to Central Station. Whilst the Consortium agrees with the principle of ultimately providing access through the Central Place Sydney site, we note that:

a) limited assessment of the traffic implications of this arrangement has been undertaken; and

b) the design and access arrangements remain subject to commercial negotiations currently underway between the two parties.

The Block C Rezoning Proposal has not considered the traffic implications of having a primary access via Block B, which could potentially lead to vehicles queuing on Lee Street. The Consortium accordingly recommends the Block C Transport Assessment be revised to consider the potential impacts of introducing new land uses, more GFA and the consequential need for alternative access and servicing requirements.

As detailed in Attachment 1, the applicant is committed to working with Atlassian and Dexus/ Frasers to complete cumulative transport modelling for the agreed access arrangements, and to consider any such planned modifications to Lee Street access. Such modelling will form part of any future DA's noting that Arup has previously completed traffic modelling for the precinct to understand impacts associated with increased servicing demands of the western sub-precinct. This modelling demonstrated that the Lee Street/ Regent Street intersection would continue to operate satisfactorily at Level of Service B in both peak hours.

The Block C Transport Assessment prepared by GTA has already estimated cumulative traffic generation of the western sub-precinct based on information available at the time and confirmed that the modest increase in vehicle trips associated with the precinct is not expected to present a significant impact to traffic in the local area nor the operation of the key surrounding intersections. With consolidated access via Block B, any future DA's will assess and verify in further detail (including modelling) the cumulative impacts on the surrounding road network, including the Lee Street / Regent Street intersection. Overall, the results outlined in the traffic studies demonstrate that a development of this scale and general land use proportion can be facilitated without unreasonable adverse impact on the local traffic network.

The Consortium notes that access to the Block C basement through Block B's ramp and driveway system and via a direct connection from either the Block B basement or the Block A basement is subject to separate commercial negotiations.

Specifically, we suggest the following matters be addressed in any future revision to ensure appropriate access and servicing arrangements can be achieved:

- *Consider the cumulative impacts of proposed Block C servicing on the existing vehicle traffic which will be facilitated by Central Place Sydney (c.430,000sqm).*
- *In advance/lieu of this service arrangement being provided, demonstrate that access and servicing can be provided to Block C without reliance on Block B, should that latter not be delivered or suitable arrangements between the two parties cannot be reached.*

- *Stronger justification for the proposed Lee Street pick-up/drop off zone Lee Street, and careful consideration of, and implications on, pedestrian travel paths and the public domain.*

These comments are noted and agreed.

The applicant will work with Atlassian and Dexus/ Frasers to agree on the consolidated access arrangements through Block B as part of ongoing design development and future DA's. This will consider any vehicle access requirements for the over-station development (OSD) to the east of the precinct, which according to the Arup Block B Transport Assessment is only required for emergency and maintenance vehicles. All loading deliveries associated with the OSD will use a centralised distribution centre in the Block B basement. On the basis that no car parking is proposed for the OSD, this will not further impact the road network.

The applicant has also considered interim access arrangements via the existing Right of Way to facilitate access for Blocks A and C in the event that Block B is not delivered, whilst enabling delivery of the future Central Walk West. This has been completed in consultation with Atlassian.

Responses detailed in Attachment 1 address matters in relation to drop-off/ pick-up operations for the western sub-precinct.