

25 October 2013

Sydney City Centre Access Strategy
Transport for NSW
GPO Box K659
Haymarket NSW 1240

Via email: access.strategy@transport.nsw.gov.au

To whom it may concern,

RE: SYDNEY CITY CENTRE ACCESS STRATEGY

Thank you for the opportunity to provide comment on the *Sydney City Centre Access Strategy (The Access Strategy)*. The Green Building Council of Australia (GBCA) believes that an integrated approach to planning for our buildings, communities, infrastructure and transit networks is essential if Sydney and New South Wales (NSW) is to be more liveable, productive and sustainable.

The GBCA applauds the NSW Government's extensive stakeholder engagement approach to producing the *NSW Long Term Transport Master Plan* and now this *Sydney City Centre Access Plan*. The stakeholder engagement process and customer-focused transport planning agenda is commendable as a first step; the ultimate success of *The Access Strategy* and *Transport Master Plan* will be determined by the degree of successful implementation over the next two decades.

The Access Strategy has identified three key themes that provide direction to assist in transforming how people access transport and interact with the businesses, services and amenities of the city's central CBD. These include;

- Reducing congestion
- Servicing future growth in demand
- Improving the customer experience.

Whilst the GBCA supports all three of these themes, the GBCA believes it is vitally important these themes are considered in context with a 'joined-up' long-term and holistic view of demand-side and supply-side solutions, rather than just through short-term actions. These long-term visions and actions should consider the future of the city's CBD with regard to social, environmental and economic impacts.

With these key themes in mind, the GBCA believes *The Access Strategy* identifies a number of important actions and key infrastructure projects to help deliver a more efficient, capable and amenable transport network. However there seems to be a lack of initiatives focused on behavioural change. The GBCA urges the NSW Government to consider ways in which they could look to reduce the number of overall commuter trips into and around the CBD. While the GBCA agrees that it is important to shift more commuter trips to public transport or lower impact transportation options, a reduction in demand is just as important and can often be achieved with benefits of additionality (productivity, affordability and social improvements, with considerable environmental value).

The GBCA asks the NSW Government to consider engaging with employers and employees, building owners, managers and tenant on different workplace strategies that can help improve workplace flexibility and options for working remotely. For example, if just half of the people moving around the Sydney city centre each week could work from home just one day a week, it would reduce the transport demand on existing infrastructure by 10% immediately. Many Green Star-rated projects are adopting activity-based working (ABW) practices so as to explore this flexibility, reduce demand on buildings (number of staff working in an office at one time) and transport infrastructure, improve productivity and work-life balance and encourage staff attraction and retention. Some examples of projects in Sydney that have adopted flexible working conditions and activity-based working environments include Macquarie Bank at 1 Shelley St, the GPT Group in the MLC building and Commonwealth Bank at Darling Quarter.

Whilst the transport infrastructure projects proposed by *The Access Strategy* are definitely required for the Sydney CBD to function more effectively, consideration of infrastructure that will enable efficient remote working facilities, best practice enterprise connectivity and the highest standards of wireless connectivity should also be considered in the context of *The Access Strategy*. These sorts of technologies will assist NSW to start on a long-term shift towards more flexible working arrangements through teleworking and alternative working arrangements, since demand-side elements should be considered within any truly integrated transport strategy for the Sydney City CBD.

From a strategic point of view, it will be important to ensure the complete integration of this Access Strategy with the *Long Term Transport Master Plan*, as well as the *Metropolitan Strategy for Sydney*, *Infrastructure NSW's State Infrastructure Strategy* and be in line with the NSW Planning System reform agenda and use these to inform state budget priorities. We believe that use of an holistic approach and 'joined-up thinking' is essential to achieving the best outcomes for long term transport planning in Sydney and the state.

As outlined in *The Access Strategy* an update will be made after 5 years, it is critically important that any decisions and actions are revisited regularly, along with proper stakeholder engagement to ensure that the intended outcomes are still fit for purpose. This is important in the context of *The Access Strategy*, but also the longer term state master plans and strategies.

The GBCA would also like to acknowledge the great work that the City of Sydney is undertaking in facilitating better public transport, walking and cycling options within the Sydney city CBD area. We urge the continued engagement between the NSW Government and the City of Sydney to help achieve the best outcomes for Sydney and NSW.

About GBCA

The GBCA is Australia's leading authority on green buildings and communities, established in 2002 to develop a sustainable property industry in Australia and drive the adoption of green building practices. The GBCA promotes green building programs, technologies, design practices and processes, and operates Australia's only national voluntary comprehensive environmental rating system for buildings and communities - Green Star.

The GBCA has more than 725 member organisations, including government departments, which work together to support the Council and its activities. The GBCA is also a founding member of the World Green Building Council (WorldGBC), which was established to provide a federated 'union' of national green building councils with a common goal to support the sustainable transformation of the global property industry; there are now 98 such councils worldwide.

Green Star rating tools

Green Star is a voluntary rating tool that encourages, recognises and rewards best practice and innovation. The first Green Star rating tool was released in 2003 in response to market demand for a rating tool that would evaluate the environmental design and construction of buildings as well as establishing a common language for green buildings.

There are currently 10 Green Star rating tools which address a range of building types and more than 620 projects have achieved Green Star certification across Australia, with a further 480 projects registered. The Green Star rating system is designed to take an holistic approach within each class and building sector, addressing nine categories in total: Management, Indoor Environment Quality (IEQ), Energy, Water, Materials, Land Use and Ecology, Emissions, Innovation and Transport.

Green Star currently addresses transportation issues by encouraging alternatives to private car use, and ensuring adequate amenities are provided to facilitate this outcome. *The Access Strategy* identifies the importance of this initiative stating "[i]mplementing the *Access Strategy* will mean a shift to a greater proportion of people using public transport to access the city centre". Limiting private car parking space (where appropriate), promoting fuel-efficient vehicles such as small cars or hybrid technologies, encouraging car-share and car-pooling initiatives, providing suitable parking facilities, and encouraging cycling through provision of adequate cyclist (or end-of-trip) facilities are all examples of how Green Star addresses transportation at the individual building scale.

Green Star projects are also rewarded for how their location encourages the use of mass public transport based on the number and frequency of transport routes, as well as the distance from the building to the station or stop. Finally, best practice transport design and planning is recognised through the inclusion of pedestrian and cyclist pathways and the development of suitable travel plans.

Examples of world-leading Green Star-certified projects within Sydney include:

- 1 Bligh Street (DEXUS Property)
- 1 Shelley Street (Macquarie Bank)
- 39 Hunter Street (Kador Group)
- 100 Market Street (Westfield)
- Darling Quarter (Lend Lease)
- Legion House and 161 Castlereagh Street (Grocon).

Midtown interchange precinct and other key hubs

The Access Strategy identifies some crucial public transport infrastructure projects needed in the Sydney City CBD including the development of midtown interchange precinct and other key hubs as well as the introduction of the Inner West and South East light rail. The GBCA believes that rail links, interchange and network upgrades and pedestrian pathway improvements are priority projects for Sydney and we have long encouraged public transport alternatives within our suite of Green Star rating tools, as explained above.

With over 620 projects certified, Green Star has a proven track record when it comes to implementation of efficient, healthy and productive green buildings and spaces. With Green Star now able to be customised to suit any development type via the 'Green Star – Custom' process, the GBCA encourages Transport for NSW to consider how Green Star's proven track record could be applied to the development of new interchanges and the upgrade of existing transport infrastructure projects to help ensure that;

"These purpose-designed hubs will be developed as high quality and high amenity areas with improvements focused on pedestrian access, street furniture, lighting, signage and other amenities."

Green Star can assist Transport for NSW in creating an interchange strategy that addresses best-practice design principles for the built environment and includes guidelines for modern amenities, safe walking routes and pedestrian-friendly access, cyclist facilities, accessible design and materials choices, as well as social and environmental impacts of interchange infrastructure.

Green Star for communities

In 2009, the GBCA commenced work, in consultation with industry and all levels of government including Urban Growth NSW and the City of Sydney, on the development of a rating tool for sustainable development projects on a community or precinct scale, examining issues of economic, social and environmental importance. The first step in developing the Green Star – Communities rating tool was to develop a national framework consisting of five best practice principles, plus Innovation:

- Enhance liveability
- Create opportunities for economic prosperity
- Foster environmental responsibility
- Embrace design excellence
- Demonstrate visionary leadership and strong governance.

Stage 2 of the project involved establishing best practice benchmarks and metrics for assessing and certifying sustainable communities and precincts. A set of 38 credits was then developed and tested on a number of projects across Australia. The Green Star – Communities PILOT rating tool was launched in June 2012 and the GBCA has since accepted expressions of interest from organisations that would like to participate in the PILOT program. A copy of the Green Star – Communities National Framework and a guide to the credits can be found on the GBCA website: <http://www.gbca.org.au/green-star/green-star-communities/>

Urban Growth NSW has played a key role in the development of the Green Star – Communities rating tool and it is vital that the NSW Government capitalises on the investment of knowledge and resources made by Urban Growth NSW. The GBCA invites Transport for NSW to consider ways in which the Green Star – Communities framework and rating tool could assist the NSW Government achieve its long term transportation objectives for Sydney. Several credits from the Green Star – Communities rating tool are outlined below to demonstrate how they could inform and provide benchmarks measure the success of the *Sydney City Centre Access Strategy*.

Providing efficient transport networks

The *Env-11 Transport* credit requires an Integrated Transport Plan (ITP) to be developed for each project which sets out how various forms of transport will be integrated with land use. An ITP should encourage sustainable transport outcomes, particularly the existing and future public transport network and planning and provisions for active forms of transport.

There are a number of other considerations captured under the Green Star – Communities PILOT rating tool that will contribute to more efficient provision of transport. As well as smart planning and design of precincts and communities, demand-side factors can help to ease pressure on transport networks at peak times and contribute to greater efficiencies. All of the Green Star rating tools aim to highlight the relationships between our built environment and transport solutions, and use of the Green Star – Communities rating tool would help the integrated planning, design and delivery of proposed infrastructure.

The *Econ-7 Digital Economy* credit encourages developments to deliver infrastructure that will enable efficient remote working facilities, best practice enterprise connectivity and the highest standards of wireless connectivity. These sorts of technologies will assist NSW to start on a long-term shift towards more flexible working arrangements through teleworking arrangements, since demand-side elements should be considered within any truly integrated transport strategy for the Sydney City CBD.

Providing equitable access to a great lifestyle

The Green Star – Communities PILOT rating tool includes credits such as *Liv-3 Healthy and Active Living*, *Liv-5 Safe Places* and *Liv-7 Accessibility and Adaptability* which provide a range of benchmarks for equitable access. GBCA recognises that there are many factors that need to be considered if equitable access to a great lifestyle can be achieved for everyone in our community. Green Star – Communities can further support this aim through a number of the credits previously outlined which focus on affordability and improving access to transport as well as economic and education opportunities.

Community engagement

Effective engagement is necessary for the development of a vision that is shared by stakeholders across the community, industry, and government. To progress towards such a vision successfully, a project must build community capacity, assess performance, and encourage ownership and leadership in the realisation of goals and objectives. The *Gov-4 Engagement* credit rewards projects that can demonstrate the preparation, implementation and ongoing review of a stakeholder engagement strategy. Projects are further rewarded when evidence can be provided that a project's vision has been developed through engagement with the community.

Protecting our environment and building resilience to natural hazards

Australia is increasingly exposed to extreme weather events and natural disasters. It is important that we do all we can to protect and restore our natural environment as well as ensuring that our built environment is more adaptable to a changing climate and more resilient to natural hazards. The *Gov-6 Adaptation and Resilience* credit specifies the development of a Climate Adaptation Plan and a Community Resilience Plan to identify threats and facilitate faster recovery, when or if disaster strikes.

Providing efficient transport networks and infrastructure while protecting the natural environment and ensuring resilience to climate change are equally important and we believe that the Green Star – Communities rating tool provides a framework and benchmarks that can inform the delivery of the *Sydney City Centre Access Strategy* to serve Sydney and NSW for the next 20 years and beyond.

Built form sustainability

The impact of the built form and transport infrastructure on the natural environment is not considered at all within the *Sydney City Centre Access Strategy*. We urge Transport for NSW to consult with the GBCA to ensure that the proposed actions and initiatives are delivered in a way that is economically, socially and environmentally sustainable. This submission has outlined ways in which the Green Star holistic sustainability rating system can assist Transport for NSW achieve a coordinated and well implement 20 year strategy that addresses sustainability of the built environment, with review after five years.

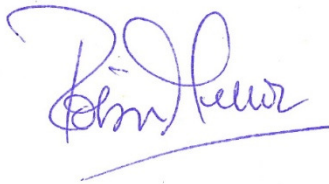
Coordination and implementation

An integrated, whole-of-government approach is an essential part of delivering the 20 year plan for a less congested and more amenable Sydney City CBD transportation experience. 'Joined-up thinking' at the planning and delivery stage will be required if we are to integrate transport with land use planning effectively, match infrastructure delivery with growth demands and better connect the transit network. Joined-up thinking will result in efficiencies between all levels of government and a successful implementation model that will achieve truly sustainable, long term outcomes.

It is crucial that we have alignment between this Access Strategy with the *Long Term Transport Master Plan*, as well as the *Metropolitan Strategy for Sydney*, *Infrastructure NSW's State Infrastructure Strategy* and be in line with the NSW Planning System reform agenda. These various plans and strategies need to be aligned to ensure efficiency of delivery according to priority and budget constraints. Additionally, further details around built form sustainability need to be considered, and the GBCA would be pleased to work collaboratively with Transport for NSW to define the metrics that could be used to evaluate the social, economic and environmental sustainability of integrated transport infrastructure within the Sydney City CBD.

The GBCA would welcome the opportunity to further discuss how its Green Star rating tools can help inform some of the proposed projects and actions within *The Access Strategy* and deliver a more liveable, productive and sustainable Sydney City CBD. Please do not hesitate to contact me should you require any further information, to arrange further consultation, or to organise a briefing for your team.

Yours sincerely,



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