

# **Sydney Metro West**

Hunter Street East Over Station Development  
Addendum to Transport and Access Report

# Contents

1	Introduction .....	4
1.1	Background .....	4
2	Updates .....	5
2.1	Interface with the public domain .....	5
2.1.1	City North Public Domain Plan .....	5
2.1.2	Pedestrian volumes .....	5
2.1.3	Driveway on O'Connell Street .....	6
2.2	City access and transport .....	7
2.2.1	Pedestrian assessment.....	7
2.2.2	Parking provision .....	9
2.2.3	Vehicle access and loading.....	11
2.2.4	Traffic assessment.....	12
2.2.5	Potential for change .....	13

Appendix A Swept path analysis

## List of Figures

Figure 1	Driveway access at O'Connell Street	7
Figure 2	Comparison of Fruin and Walking Space Guide Criteria	8
Figure 3	2026 AM Peak Hour Footpath Demand & LOS (Based on Walking Space Guide LOS Criteria) (Source: Mott MacDonald 2022)	8

## List of Tables

Table 1	Car share spaces	11
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# 1 Introduction

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## 1.1 Background

The City of Sydney has provided comments on the Environmental Impact Statement submitted for the Concept State Significant Development Application (SSDA) relating to the Over Station Development (OSD) at Hunter Street East.

The Concept SSDA for Hunter Street East seeks consent for a building envelope above the Hunter Street Station eastern site, including:

- Maximum building height of between RL 238.9 and RL 269.1 (approximately 58 storeys)
- Maximum gross floor area (GFA) of 84,223sqm
- Land uses within the OSD building envelope and podium including commercial uses within the tower, commercial and retail land uses within the podium
- Provision for up to 70 car parking spaces within the podium or tower envelope (a total of 70 spaces are to be provided between the eastern and western Hunter Street Station sites, with the number on each site to be determined in a future Detailed SSDA)

Responses have been provided below for each comment.

## 2 Updates

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### 2.1 Interface with the public domain

#### 2.1.1 City North Public Domain Plan

##### **City of Sydney comment**

The Concept SSDA should refer to the City North Public Domain Plan (draft update exhibited in November/ December 2022). The provision of additional pedestrian space around the site by widening the footpath on Hunter Street is a priority to support this proposal.

Consideration of this public domain vision at the concept design stage will ensure that the opportunities for a maximised pedestrian area including landscape and significant trees in the future public domain are preserved through the design of all components of the Metro project.

Overall, the concept SSDA should reflect the current context, with George Street north now closed to through traffic and Hunter Street closed just east of the George Street intersection.

##### **Response**

The proposed development will not preclude implementation of the City North Public Domain Plan and the proposed closure of O'Connell Street to traffic. Sydney Metro has revised its access strategy to a left-in and right-out arrangement for both light and heavy vehicles during operational use of the OSD on O'Connell Street, if O'Connell Street allows 2-way circulation, to maintain vehicular access to and from the Sydney Metro site.

The swept path assessments for the OSD loading dock entry have been updated accordingly and are included in Appendix A.

Sydney Metro will continue to work with City of Sydney regarding vehicular access and the required swept path in relation to the City North Public Domain Plan to maximise the provision of additional pedestrian space where possible. This will occur through future consultation with City of Sydney.

#### 2.1.2 Pedestrian volumes

##### **City of Sydney comment**

The Transport and Access Report (p22) states that pedestrian accessibility on Hunter Street is constrained by high pedestrian volumes on the footpath, restricting flow and causing crowding, particularly around the intersection of Pitt Street.

These existing restricted and crowded footpaths on Hunter Street will be significantly impacted by the proposal. The cumulative impact of the Metro and the surrounding development will be significant and are inadequately modelled in the proposal (refer Transport and Access comments below).

Hunter Street will facilitate a significant amount of surface level pedestrian movement between Metro West, Metro City & South East, Light Rail and Wynyard Station. In addition, it provides a connection between this new transport hub and the Macquarie Street precinct, and Sydney Modern/RBG beyond.

Public domain works needed to support this SSDA include significant additional pedestrian space in Hunter Street between Pitt Street and George Street.

The Concept SSDA does not include any improvement to the existing quality of quantity of public space surrounding the site. The EIS refers to the CSSI as covering these public

domain areas, however no specific improvements to the public domain have been proposed under the CSSI. This needs to be addressed.

### **Response**

The impact on surrounding footpaths from people accessing the Hunter Street OSD is expected to be minimal. The OSD has excellent underground access to the Sydney Metro and Sydney Trains networks due to:

- The OSD will have direct access to Sydney Metro West (SMW) without impacting on surface footpaths
- The OSD will have underground tunnel access to both Wynyard Station, to the west and City & Southwest Metro and Martin Place Station to the south-east
- The proposed Sydney Metro through-site link from O'Connell Street to Bligh Street, on the eastern OSD site will facilitate access to the eastern OSD, eliminating impacts on the northern Hunter Street footpath between O'Connell Street and Bligh Street.

This OSD is the best opportunity for City of Sydney to maximise GFA yields whilst minimising footpath and traffic impacts in the precinct. Development located further away from the Hunter Street station will generate footpath movements between the station and the development. The OSD position above the station, with underground access to Sydney Metro and Sydney Train networks, provides more convenient access and is likely to encourage higher public transport mode share than sites located further away from the station, with reduced public transport connectivity.

The proposed development supports City of Sydney proposal for road closures and/or footpath widening proposals within the station precinct, having regard to ongoing Metro West construction access needs. The OSD will not preclude these initiatives.

Upgrades to the pedestrian network across this precinct will be driven by the broader precinct vision, guided by TfNSW's strategic city centre work, which is outside the scope of this Concept SSDA. The projected growth in commercial development across this precinct will also drive additional demand on the public domain, requiring broader coordinated efforts to deliver a consistent outcome. It is understood that the City of Sydney will coordinate public domain upgrades funded through developer contributions, including those from the OSDs at both the east and west Hunter Street Station sites.

Sydney Metro recognises the competition for space around the Hunter Street precinct and will continue to work with the City of Sydney and TfNSW on appropriate design solutions that will support and benefit the wider precinct to ensure a high-quality and integrated pedestrian environment is achieved.

### **2.1.3 Driveway on O'Connell Street**

#### **City of Sydney comment**

The reference design shows a two-way driveway across the O'Connell Street footpath, with very wide splayed kerbs. Any driveway should be perpendicular to the kerb to minimise impact on the pedestrian footpath. The proposal should also reflect the opportunity to close O'Connell Street at Hunter Street, as shown in the draft City North Public Domain Plan.

#### **Response**

Swept path analysis has been updated to show right only exit in response to the objectives of the City North Public Domain Plan (Appendix A).

Both the exit and entry movements from the site are perpendicular to the kerb at the footway crossing, as shown in 1.

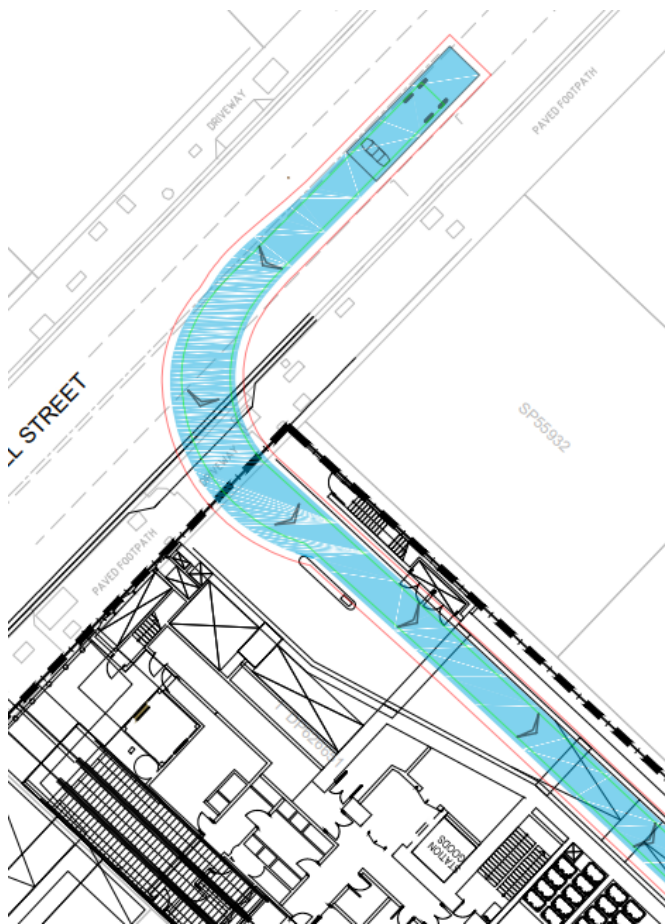


Figure 1 Driveway access at O'Connell Street

## 2.2 City access and transport

### 2.2.1 Pedestrian assessment

#### City of Sydney comment

The City strongly objects to the use of Fruin for assessing footpath performance on Hunter Street and surrounds. This is an issue that the City has raised multiple times in previous submissions on the CSSI applications as well as during consultation meetings with Sydney Metro.

The City reiterates that the Walking Space Guide (WSG) published by TfNSW in 2020 at <https://standards.transport.nsw.gov.au/search-standard-specific/?id=TBA%20-%200003173:2022> is appropriate NSW standard for footpaths external to buildings in the public domain. It is misleading to imply that these footpaths are 'interchanges'. This leads to an under provision of walking space, crowding issues and safety concerns.

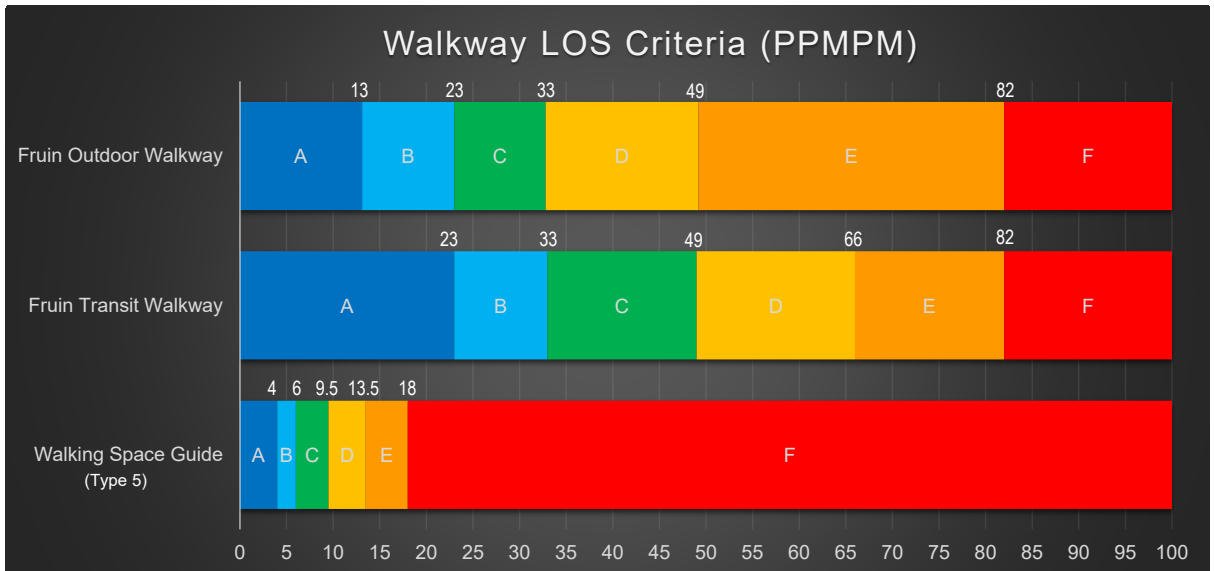
Sydney Metro argues that TfNSW's WSG is not fit for purpose as it shows poor performance for current conditions. The City's position is that this is an accurate representation of existing conditions and a reason for intervention and road space reallocation, not a reason to ignore the issue by using a metric more suited to crowded station conditions.

#### Response

The proposal used the Fruin Outdoor Walkway Criteria to assess footpath performance. Nearly all footpaths are forecast to operate at LOS C or better using this performance criteria. The exception is the southern footpath of Hunter Street, west of Pitt Street. This section would operate at LOS D, with or without SMW, or this OSD. The Fruin Outdoor

Walkway criteria used is standard practice and considered appropriate for assessing conditions around a metro interchange.

We understand that the City of Sydney is requesting a reassessment of the footpath performance using the Walking Space Guide (WSG) criteria. This aspirational criterion is significantly more onerous than the Fruin criteria and may be more appropriate when applied to a greenfield development context. A sample comparison of the Fruin Walkway scales and the WSG, for Type 5 walkways, is provided in Figure 2.



**Figure 2 Comparison of Fruin and Walking Space Guide Criteria**

However, in line with the City’s request, Sydney Metro has undertaken an analysis of footpath performance under projected 2036 AM Peak hour flows (with and without metro) using the WSG criteria. The results are presented in Figure 3.

	2036 Forecast Flows PPH (Without SMW)	2036 Forecast Footpath LOS (Without SMW) (2)	2036 Forecast Flows PPH (With SMW)	2036 Forecast Footpath LOS (With SMW) (2)
<b>Hunter St Footpaths</b>				
Hunter St, north footpath, east of George St	720	B	830	C
Hunter St, South footpath, east of George St	3890	F	3890	F
Hunter St, north footpath, west of Pitt St	370	A	370	A
Hunter St, south footpath, west of Pitt St	4440	F	4710	F
Hunter St, north footpath, east of O’Connell	3050	F	780	B
Hunter St, south footpath, east of O’Connell	2730	F	2730	F
Hunter St, north footpath, east of Bligh St	430	A	1450	D
Hunter St, south footpath, east of Castlereagh St	1280	C	1280	C
George St, eastern footpath, north of Hunter St	570	C	1390	E
George St, western footpath, north of Hunter St	3200	F	3860	F
George St, eastern footpath, south of Hunter St	1620	B	3110	D
George St, western footpath, south of Hunter St	3440	F	3440	F
Pitt St, eastern footpath, north of Hunter St	970	C	1230	C
Pitt St, western footpath, north of Hunter St	890	C	1160	C
Pitt St, eastern footpath, south of Hunter St	950	B	1510	C
Pitt St, western footpath, south of Hunter St	350	A	790	B
O’Connell St, eastern footpath, north of Hunter St	3660	F	4410	F
O’Connell St, western footpath, north of Hunter St	690	B	690	B
Bligh St, eastern side, north of Hunter St	910	C	910	C
Bligh St, western side, north of Hunter St	1040	C	1610	D
Castlereagh St, eastern side, south of Hunter St	1170	D	2250	F
Castlereagh St, western side, south of Hunter St	260	A	260	A

**Figure 3 2026 AM Peak Hour Footpath Demand & LOS (Based on Walking Space Guide LOS Criteria) (Source: Mott MacDonald 2022)**

The results of the WSG application demonstrate that currently, and under existing growth projections within the metro, the adjacent pedestrian network does not achieve an acceptable level of service (LoS C) according to the WSG criteria. This highlights the



challenge in applying the WSG in a high-density city centre environment with limited street space for complex and competing movements. This assessment can be provided to the City of Sydney for information purposes only in order to inform the ongoing collaboration between the City of Sydney, TfNSW and Sydney Metro on precinct related matters.

Much of the existing pedestrian network in the precinct would fail today under those WSG criteria. The justification for not suggesting footpath upgrades as part of the SMW is that this is an existing problem that Sydney Metro is contributing a small impact to. It is unreasonable to make Sydney Metro responsible for existing or future problems generated by other development activities within the precinct. However, we will work with stakeholders to develop upgrade strategies that benefit the wider precinct.

Upgrades to the pedestrian network across this precinct will be driven by the broader precinct vision, guided by TfNSW's strategic city centre work, which is outside the scope of the Concept SSDA. The projected growth in commercial development across this precinct will also drive additional demand on the public domain, requiring broader coordinated efforts to deliver a consistent outcome. It is understood that the City of Sydney will coordinate public domain upgrades funded through developer contributions, including those from the OSDs at both the east and west Hunter Street station sites.

OSD offers an opportunity for City of Sydney to maximise GFA yields whilst minimising footpath impacts in the precinct. Development located further away from the metro station will generate footpath movements between the station and the development. The OSD position above the station, with underground access to Sydney Metro and Sydney Train networks, provides more convenient access and is likely to encourage higher public transport mode share than sites located further away from the station, with reduced connectivity.

Sydney Metro recognises the competition for space around the Hunter Street precinct and will continue to work with the City of Sydney and TfNSW on appropriate design solutions that will support and benefit the wider precinct to ensure a high-quality and integrated pedestrian environment is achieved.

## **2.2.2 Parking provision**

### **Mechanism to limit parking across two sites**

#### **City of Sydney comment**

The proposal includes a maximum of 70 private spaces across the two sites (Hunter Street East and West). However, since the sites are being assessed as independent SSDAs and there does not appear to be any meaningful and legal way for conditions of consent to apply to sites other than that of the SSDA, it is unclear how this maximum will be enforced. The City raises strong concern that the end result will be that each site seeks to provide 70 spaces each, with a total of 140 spaces. This would result in adverse traffic volumes and reduced amenity and walking comfort on Hunter Street and is not supported by the City.

#### **Response**

The number of car parking spaces proposed (70) is less than half of the maximum permissible spaces permitted across both sites (148) as prescribed in the Sydney Local Environmental Plan (LEP) 2012. As the LEP provides the relevant guidance for this proposal, this number was considered acceptable and well within the maximum limit. Furthermore, this is a reduction on the number of car parking spaces that existed across the west and east sites prior to demolition (86).

The proposed development seeks approval for the inclusion of an upper limit of 70 spaces across both sites, in line concurrent Planning Proposal requesting development will not exceed a maximum of 70 car parking spaces across both sites.

The maximum number of car parking spaces sought across both buildings was applied to each building to determine a 'worst case' scenario of each building (though acknowledging the proposal still only sought approval for 70 spaces across both buildings).

It is acknowledged that 70 car spaces will not be applied to each site and a combined total of 70 spaces are to be shared between the east and west Hunter Street sites, with the number on each site to be determined in a future Detailed SSDA.

Sydney Metro acknowledges that the City of Sydney are exploring a new public domain vision for Hunter Street to improve pedestrian amenity. Ongoing collaboration between Sydney Metro, the City of Sydney and TfNSW on the design and operation requirements will ensure the City's vision can be achieved.

## **Parking volume**

### **City of Sydney comment**

The proposal indicates that there will be 70 spaces included for private vehicle parking across the two sites. The traffic assessment gives no justification for the need for 70 spaces beyond that it is lower than the permitted maximum.

The City notes that these rates are maximums and given the extremely high access to public transport at the site, including the Metro, the City would expect to see much lower car parking provision than proposed.

This is an opportunity for Sydney Metro to lead by example. The delivery of the Metro network is a transformational project that will change the nature of the Hunter Street precinct and pave the way for zero or ultra-low car developments. This SSDA should be providing an exemplar of the sort of development that the Metro itself was designed to encourage.

### **Response**

The total combined number of proposed parking spaces located at both the west and east sites is not to exceed 70 spaces. The distribution of those 70 spaces between the two sites will be defined at Detailed SSDA.

A first principles approach was taken to calculate the number of commercial trips, based on the number of available spaces and the future mode share splits (1% for car, as driver).

Given the proximity of the proposed developed to a range of public transport links, the number of spaces is considered appropriate. The limited availability of car parking within reasonable walking distance to the proposed developed in the Sydney CBD is also anticipated to discourage the use of private vehicles, catalysing a shift to sustainable transport modes and reducing impacts on the broader road network.

## **Inconsistencies with how parking is referred to**

### **City of Sydney comment**

The Transport and Access Report doesn't consistently refer to the 70 spaces being apportioned between the two sites. For example, Table 5-4 seems to imply that the western site has 70 spaces, which is incorrect. This should be rectified.

## Response

Noted. Footnote has been included and updated below.

Car share spaces	Commercial	Retail
Proposed car parking spaces	70 <sup>1</sup>	0
Calculated share parking requirements	3	0

**Table 1 Car share spaces**

<sup>1</sup>The total combined number of proposed parking spaces located at both the west and east sites is not to exceed 70 spaces. The distribution of the 70 spaces across the two sites will be determined at Detailed SSDA.

## Car share

### City of Sydney comment

It is unclear how car share will be apportioned between the two sites and whether the proposed 3 spaces will be pro-rated depending on the final allocation of private parking.

### Response

The draft Design Guidelines for the site require a minimum 1 car share space per 25 on-site car parking to be made available. Once the distribution of parking spaces between the two sites is finalised during the Detailed SSDA approval process, the car share spaces will be assigned pro-rate in accordance with the draft Design Guideline requirements.

## 2.2.3 Vehicle access and loading

### Vehicle access movement allowed

#### City of Sydney comment

Section 5.2.3 Vehicular Access of the Transport and Access Report shows left-out and left-in movements. This section should acknowledge that the draft City North Public Domain Plan includes the ambition to close O'Connell Street at Hunter Street and make O'Connell Street two-way. This change would mean that vehicle access would also need to change from left-in left-out as depicted in Figure 5-3 to left-in right-out.

#### Response

We have considered the vehicular impacts at O'Connell Street. Revised swept path analysis for the operation of the OSD has been completed to acknowledge O'Connell Street closed north of Hunter Street and O'Connell Street. This has been included in Appendix A.

The removal of through traffic on O'Connell Street will have a significant positive impact on traffic operations in the precinct.

Sydney Metro will continue to work with City of Sydney regarding vehicular access and the required swept path in relation to the City North Public Domain Plan to maximise the provision of additional pedestrian space where possible. This will occur through future consultation with City of Sydney.

### Loading layout

#### City of Sydney comment

Swept paths should be provided showing that each loading space is able to be accessed with all other spaces occupied. Swept paths of waste trucks accessing collection points should also be provided.

## **Response**

The design continues to evolve and Sydney Metro will work with City of Sydney on the loading dock spaces and swept paths to ensure compliance.

### **2.2.4 Traffic assessment**

#### **Trip generation**

##### **City of Sydney comment**

Trip generation assumes a rate of 1 trip per space during the peak one hour. This appears to be very high and overestimating driving trips could lead to overprovision for driving and under provision for other modes, particularly walking. Instead, the applicant should conduct surveys of a similar nearby site and apply those rates.

##### **Response**

The transport and accessibility impact assessment submitted with the Concept SSDA considers a 'worst case' scenario and find the road network is expected to remain at similar levels of service, with no noticeable change associated with the traffic generated by the proposed development.

Revised trip generations can be applied using updated traffic survey data from the Guide to Traffic Generating Developments (TST 2013/04A) thereby reducing the AM peak hour trip rate to 0.4 per space, and the PM peak hour trip rate to 0.3 per space. This is based on the Trip Generation and Parking Generation Surveys (Office Blocks) for North Sydney and Chatswood.

The revised trip generations will be applied as part of the Detailed SSDA only. No noticeable change to the road network is expected due to the traffic generated by the proposed development.

#### **Background traffic growth**

##### **City of Sydney comment**

The City disagrees with the traffic background growth factor of 1.27 sourced from PTPM. There is not capacity for an additional 27% increase in vehicle traffic in the City Centre, so this could not materialise without providing additional space for it, which would be a poor planning outcome.

TfNSW has adopted a paradigm of 'vision and validate'. Assuming an exogenous growth factor that needs to be accommodated goes against this paradigm and runs the risk of leading to arguments for more priority and space for private vehicles.

The applicant should assume nil traffic growth, an assumption which has precedent in other state significant projects within the City of Sydney such as the Central Station OSD.

##### **Response**

The background growth assumptions noted in the traffic assessment are derived from TfNSW strategic Public Transport Project Model (PTPM). The growth seen here is due to the way the PTPM assigns demand and capacity constraints in the model. No changes will be made as this presents the worst-case scenario. In addition, there will be no traffic on George Street with the closure.

The purpose of including background traffic in the Concept SSDA was to assess the impact of the proposal on the surrounding network. Whilst there are limitations for using PTPM, the conclusion of this assessment was there would be no adverse effects to the surrounding network. There is no suggestion that more priority or space for private vehicles is warranted.

Sydney Metro acknowledges that the proposed City North Public Domain Plan, including the closure of George Street and O'Connell Street to traffic, will significantly change traffic demand patterns in the area. In the absence of any City of Sydney or TfNSW updated traffic modelling forecasts identifying those changes, Sydney Metro will continue to assume the worse-case growth scenario.

### **Background pedestrian growth**

#### **City of Sydney comment**

Similarly, a pedestrian growth factor of 1.17 seems very low, particularly compared to the growth assumed for vehicle traffic. It is disappointing that the applicant is assuming and planning for higher vehicle growth than pedestrian growth, particularly considering the huge investment in the area in public transport and redevelopment.

#### **Response**

Pedestrian growth factors were derived from a comparison of population and employment forecasts of travel zones within 800m of the Hunter Street station precinct. This approximates a 15-minute walk catchment. The 2021 to 2036 pedestrian growth rate factor for Hunter Street Station precinct is 1.17.

The population and employment data also comes from official NSW projections (TZP19). The analysis considers the sum of population and employment, to calculate these rates, as they both drive background pedestrian demand. The pedestrian growth rate was applied to 2021 pedestrian survey flows, pre-adjusted to account for the impacts of COVID-19, where appropriate, to estimate future year 2036 background pedestrian flows, with and without Sydney Metro West. The pedestrian growth rate was applied uniformly to the existing precinct flows. The pedestrian growth factors are also considered a 'high' scenario, as they do not consider long-term impacts of COVID-19 such as reduced population growth and increased working from home. These forecasting methods, for estimating cumulative traffic and pedestrian growth rates, is consistent with Technical Paper 1 – Operational Transport of the Sydney Metro West Environmental Impact Statement - Rail infrastructure, stations, precincts and operations (Sydney Metro, 2022).

### **2.2.5 Potential for change**

#### **City of Sydney comment**

The Transport and Access Report states that 'Due to current constraints, there is limited scope for significantly changing signal timings or increasing the footpath widths to improve walking experience in the CBD.'

The City strongly objects to the above statement. The delivery of multiple major projects within this precinct should act as a catalyst for transformative change around Hunter Street, triggering reallocation of street space to accommodate the high pedestrian volumes and creating more space in the public domain for people to spend time.

As a key driver of change in this precinct, some of that responsibility for change lies with the Metro project.

The City is eager to work with Sydney Metro and TfNSW to reallocate street space, widen footpaths and change signal timings in order to improve the overall experience of the Hunter Street precinct. The City's Public Domain Plan outlines the City's vision for public space in the precinct and includes:

- The closure of Hunter Street to private vehicles between Pitt and George Streets
- The pedestrianisation of George Street north of Hunter Street.
- The conversion of Hunter Street to a single lane one-way street between Pitt and Phillip Streets.

## Response

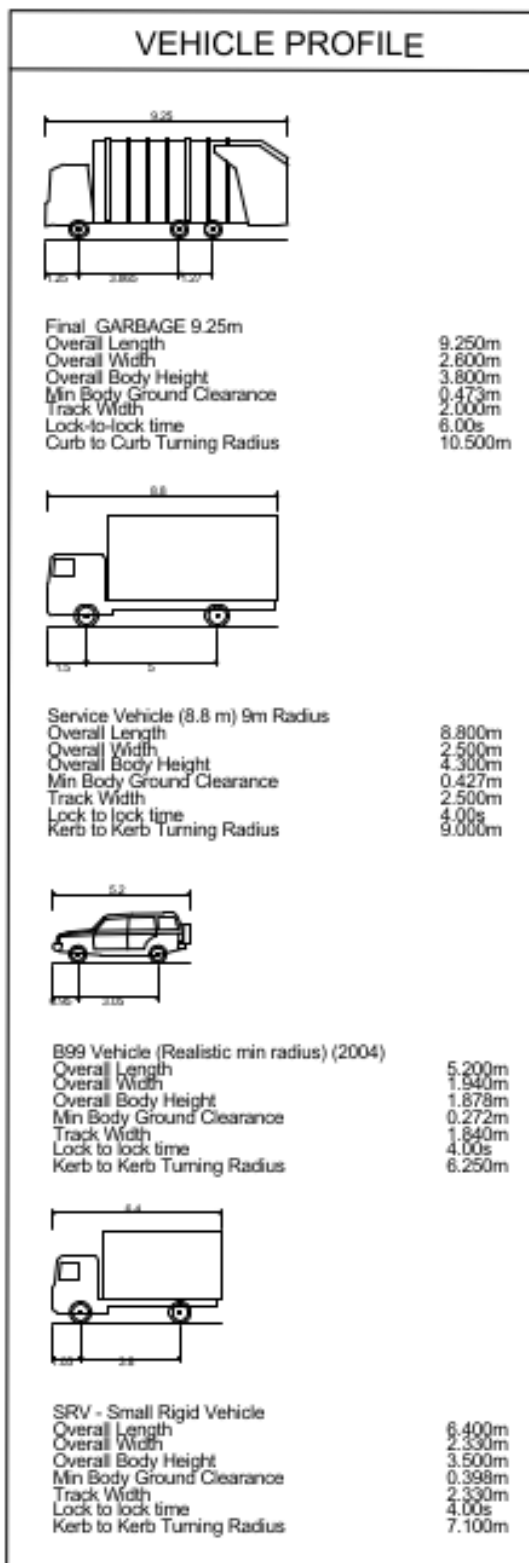
The impact on surrounding footpaths from people accessing the Hunter Street OSD is expected to be minimal. The OSD has excellent underground access to Sydney Metro and Sydney Trains networks due to:

- The OSD will have direct access to SMW without impacting on surface footpaths
- The OSD will have underground tunnel access to both Wynyard Station, in the west and City & Southwest Metro and Martin Place Station in the east
- The proposed Sydney Metro through-site link from O'Connell Street to Bligh Street, on the eastern OSD site will facilitate access to the eastern OSD, eliminating impacts on the northern Hunter Street footpath between O'Connell Street and Bligh Street.

This OSD is the best opportunity for City of Sydney to maximise GFA yields whilst minimising footpath and traffic impacts in the precinct. Development located further away from the Hunter Street Station will generate footpath movements between the station and the development. The OSD position above the station, with underground access to Sydney Metro and Sydney Train networks, provides more convenient access and is likely to encourage higher public transport mode share than sites located further away from the station, with reduced connectivity.

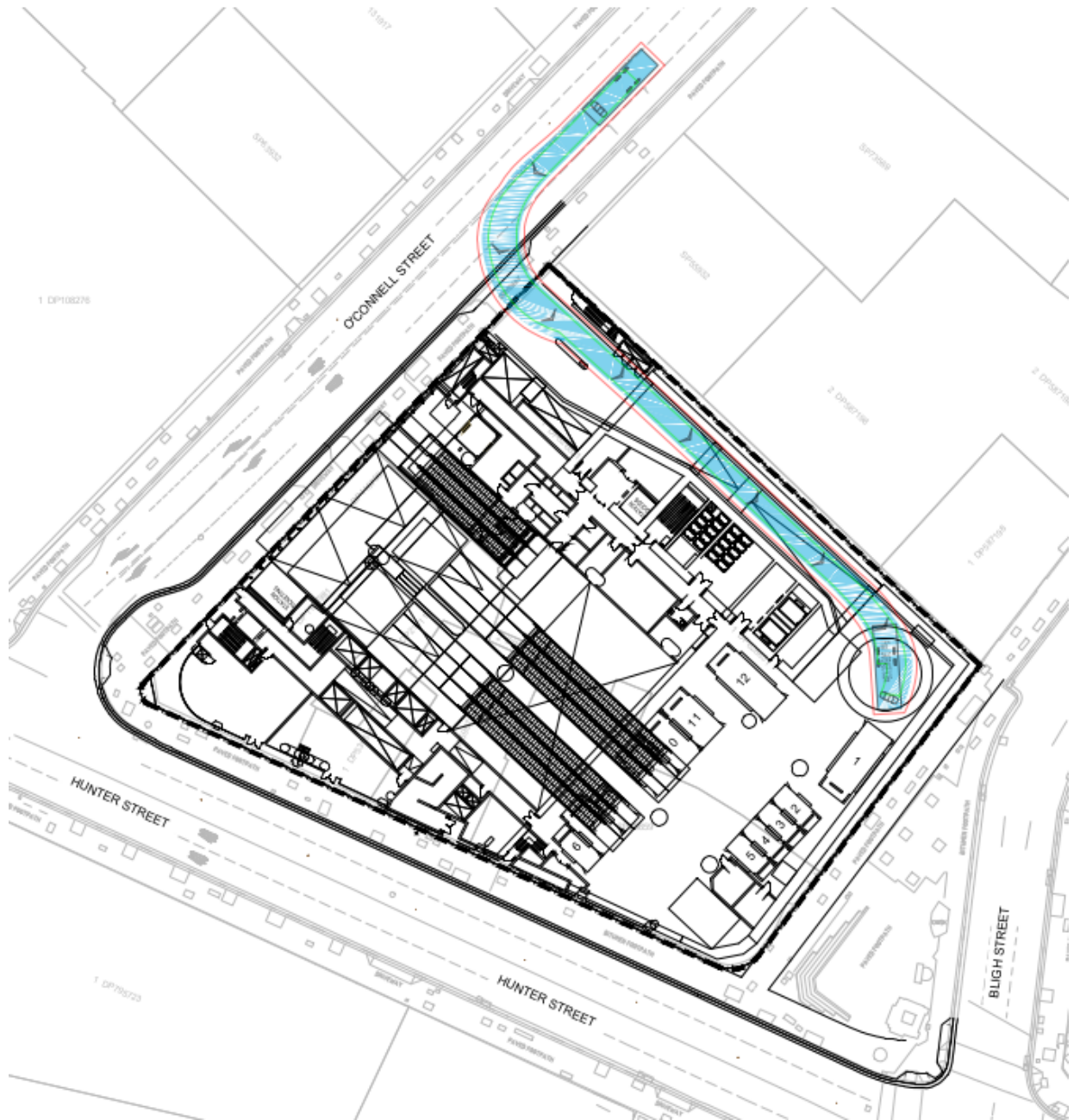
The proposed development supports City of Sydney proposal for road closures and/or footpath widening proposals within the station precinct. The OSD will not preclude these initiatives.

# Appendix A Swept path analysis



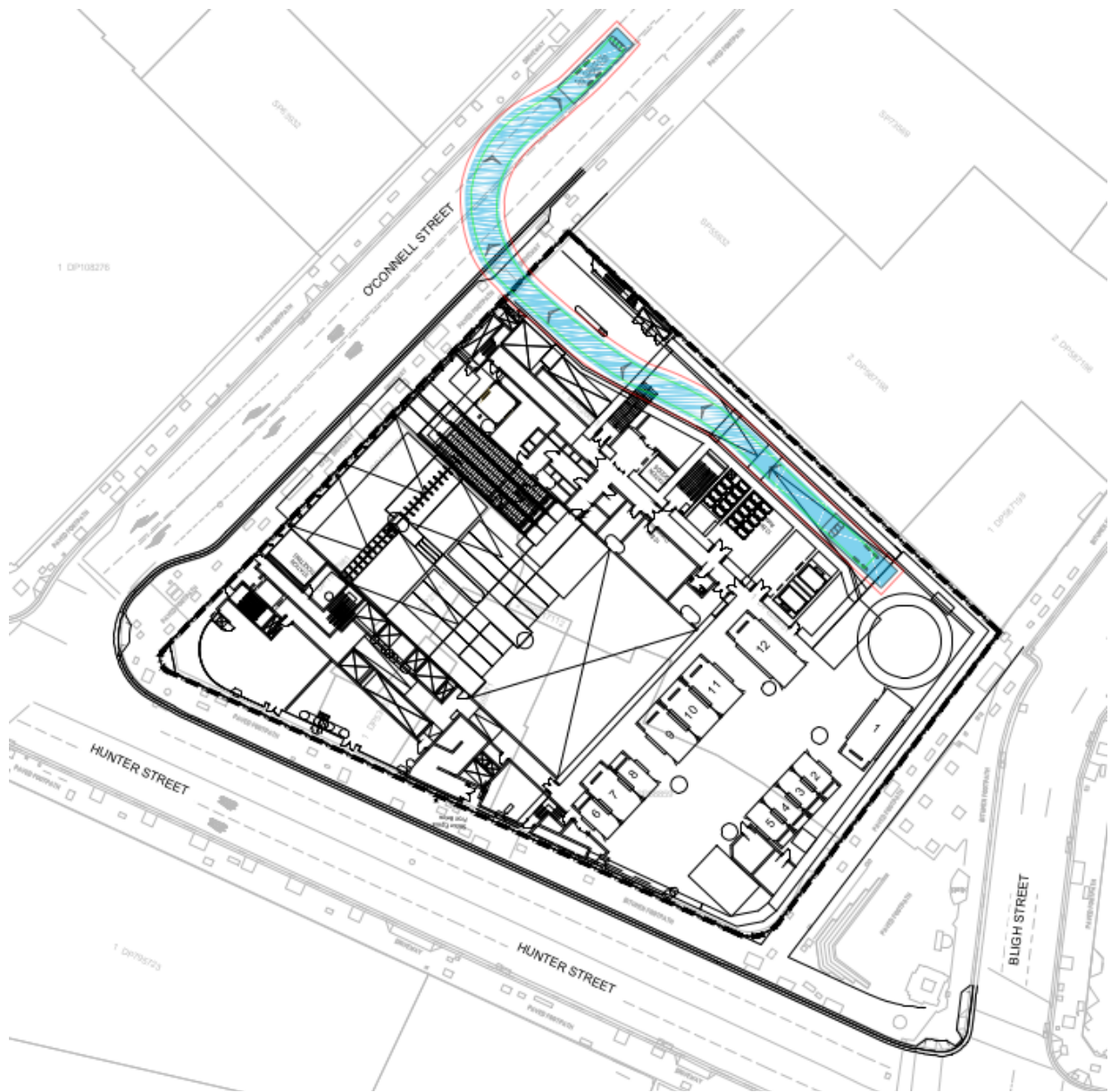
Vehicle profile



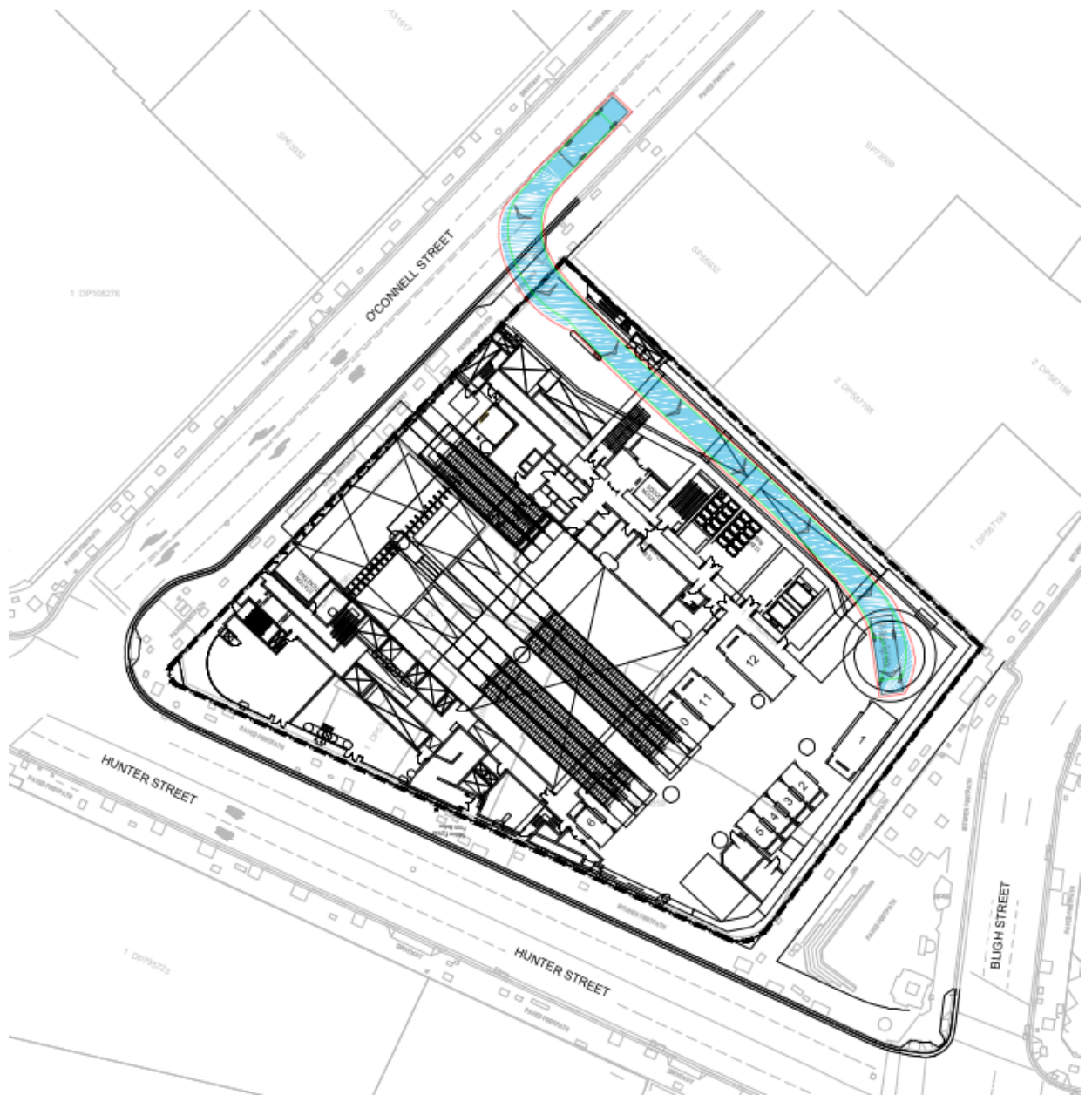


9.25M refuse vehicle access

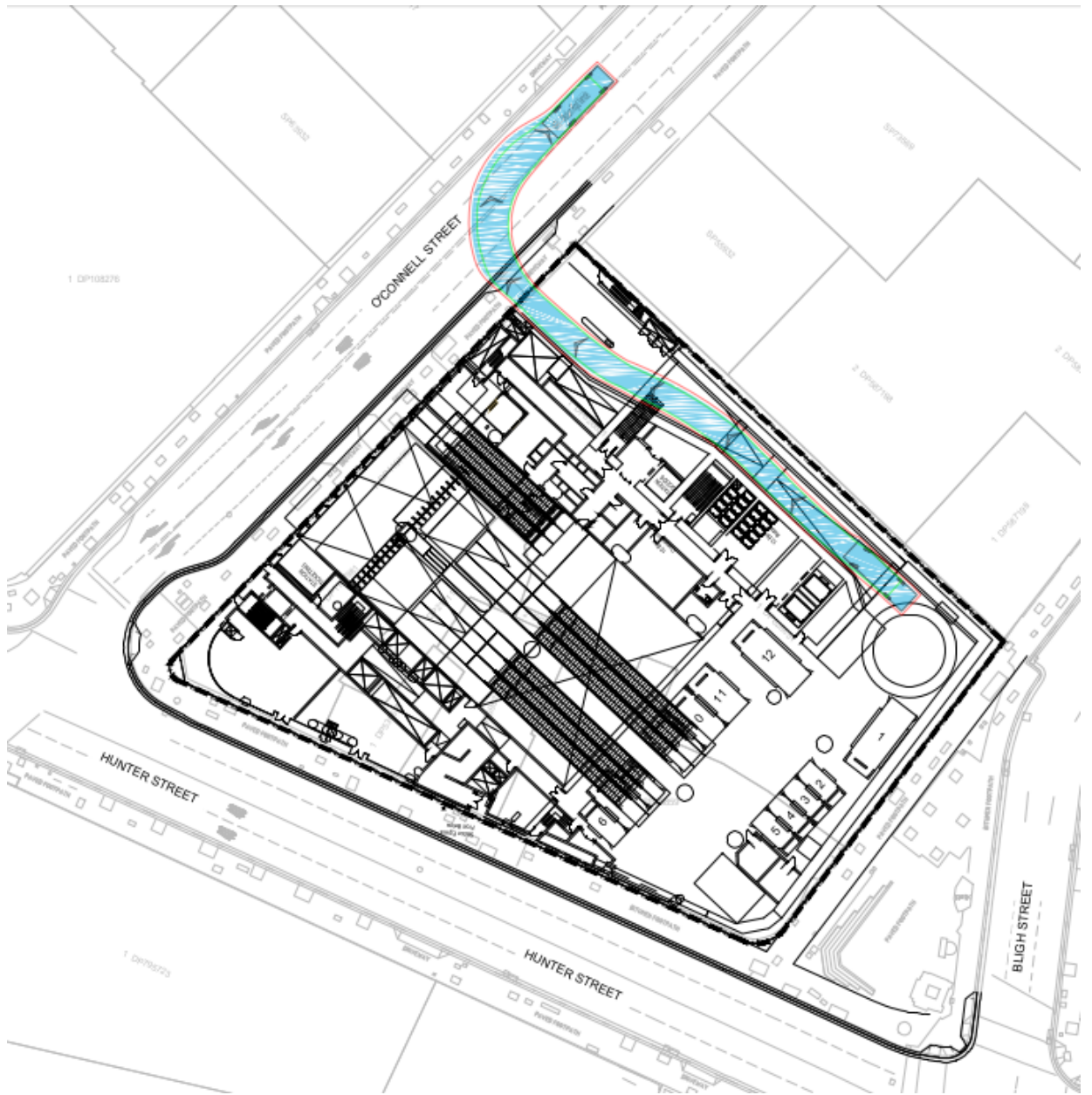




9.25M refuse vehicle exit



MRV access



MRV exit