



105 Miller Street North Sydney

Consultation Outcomes Report

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Contents

1.0	Introduction	5
1.1	The proposal	5
1.2	The Site	5
1.3	The State Significant Development Application	6
2.0	Policy context.....	10
2.1	State Government	10
2.2	Local Government	10
3.0	Methodology.....	12
3.1	Stakeholder Identification.....	13
3.2	Engagement Process Summary.....	14
4.0	Community feedback	16
4.1	Traffic	17
4.2	Wind tunnel effect.....	17
4.3	View impact	18
4.4	Construction impacts.....	18
4.5	Revitalisation of the site.....	18
4.6	Enhancements to public domain	18
4.7	General design	19
5.0	Conclusion.....	20
	Appendix 1: Newsletter Delivery	21
	Appendix 2: Drop-In Session Display Boards	22

Figures

Figure 1: The site.....	5
Figure 2: Artist impression of proposal.....	8
Figure 3: Denison Street South Facade	9
Figure 4: Community Drop-In Session.....	15
Figure 5: Community Drop-In Session	17
Figure 6: Proposed Brett Whiteley Place interface from ground.....	19

Tables

Table 1: Key stakeholders 13

Table 2: Engagement process..... 14

1.0 Introduction

The commercial real estate and property development company, Investa is preparing a State Significant Development Application (SSDA) for the redevelopment and reuse of the commercial property at 105 Miller Street, North Sydney. Investa is the owner of 105 Miller Street and is seeking to expand the floor area and introduce an educational use on the site.

The proposed change of use means that the development application is classified as a SSDA. This classification triggers the requirement for a community and stakeholder engagement to be undertaken in accordance with the New South Wales Department of Housing and Infrastructure's (DPHI) *Undertaking Engagement Guidelines for State Significant Projects* (March 2024).

1.1 The proposal

The proposed development is for the adaptive reuse of the existing commercial building at 105 Miller Street including alterations and additions for the purpose of accommodating a tertiary institution (university) on the site.

1.2 The Site

The address of the site is 105-153 Miller Street, North Sydney and is legally described as Lot 2 in DP 792740. The site sits in the heart of the North Sydney Central Business District (CBD), immediately south of the Victoria Cross Metro Station and in walking distance of the North Sydney Train Station.

The site has a total area of 6,640m², with three street frontages, to Miller Street, Brett Whiteley Plaza and Denison Street. The Miller Street frontage is occupied by a landscaped area, pedestrian walkway and retail frontage. The site has a highly visible interface with Brett Whiteley Plaza, which is identified as a key public open space in North Sydney. A range of retail occupancies are located on the Denison Street frontage of the site, set back under a low awning.

The North Sydney MLC Centre and associated turfed public domain currently occupy the site. The existing building comprises a modular building mass with a 13-storey north-south oriented western wing, a central service core and a 6-storey eastern wing, setback from the southern boundary.

Figure 1: The site



 THE SITE

NOT TO SCALE



1.2.1 Site context

105 Miller Street is located in the North Sydney Central Business District (CBD). It is a predominantly commercial environment. The site's prime location within the North Sydney CBD location provides an important context for understanding the development proposal and the change and impacts it will create in the area. North Sydney CBD is a key employment, retail and entertainment destination which serves local residents, workers and students.

The Miller Street precinct is currently undergoing major and transformative urban renewal led by significant Government infrastructure investment. Investment in new metro rail infrastructure, with the recently opened (August, 2024) Victoria Cross station being directly adjacent to the site, is a catalyst for the redevelopment of the precinct. The precinct is a key destination designed to produce significant social and economic benefits for the wider North Sydney and Sydney community.

1.2.2 Existing building

The existing MLC Building is currently over 60 years old and as such, is approaching the end of the typical commercial building life cycle. It is currently impacted by a range of issues that are not consistent with modern commercial office developments. As such, the existing building is at risk of long-term vacancy.

The building at 105 Miller Street, which dates to 1957, has reached the end of its lifecycle and is in need of complete reconstruction due to multiple structural integrity issues. The built form of the post-WWII modernist development is incompatible with the needs of commercial tenants catering to a contemporary workforce.

With a renewed life cycle of 40-50 years, there is significant overall benefit associated with the redevelopment from an economic point of view. A key objective of North Sydney Council is for the North Sydney CBD to be a key commercial office market in Sydney, and as such, it will be important for an asset such as 105 Miller Street to be redeveloped in order to remain relevant in the future.

1.2.3 Building quality

The MLC Centre building was developed employing, for its time, an innovative construction methodology and an advanced curtain wall facade system. A lightweight steel construction was used due to the scarcity of materials in the post war era and represents one of the first curtain walls delivered in Sydney.

However, the facade system was conceived and executed before the technology had been perfected. Over a 62-year period, the condition and performance of the building has deteriorated significantly, resulting in a number of issues including tiles being unstable and falling into the surrounding public spaces.

1.3 The State Significant Development Application

The proposal involves the adaptive reuse, including alterations and additions to the State heritage listed 105 Miller Street for the purposes of a commercial building and the introduction of an educational use (tertiary institution) on site. Specifically, the proposed works will include:

- Adaptive reuse and restoration of the Miller Street (MLC) building
- Demolition of the Denison Street building and construction of a new 20-storey building
- Alterations to the ground level to deliver a significantly enhanced public domain
- Construction of a double-height ground floor retail

- Creation of a new public open space along the Miller Street frontage (including level changes to enable more accessible and direct access from the footpath)
- Basement carparking and loading dock accessed from a relocated entry off Denison Street.

Concept architectural plans have been prepared by Bates Smart. Figure 3 below shows the indicative plans for the adaptive reuse of 105 Miller Street.

Figure 2: Artist impression of proposal



Source: FJC Studio, Education Scheme, 105 Miller Street Urban Design Report 2025

Figure 3: Denison Street South Facade



Source: FJC Studio, Education Scheme, 105 Miller Street Urban Design Report 2025

2.0 Policy context

The approach to community engagement for this project has been informed by both State and Local Government policies. The policies that specifically address community engagement are summarised here.

2.1 State Government

The New South Wales State Government has emphasised the importance of community engagement in State Significant Development projects. Importantly, Government also recognises the great variety of projects that fall under the State Significant banner and therefore promotes an approach to engagement that is based on proportionality, meaning that the engagement process should be designed to respond the scale and impact of the project.

2.1.1 State Significant Development Guidelines – Community Engagement

The NSW Department of Planning, Housing and Infrastructure's 2024 *Undertaking Engagement Guidelines for State Significant Projects* state that:

Generally speaking, engagement will involve informing and consulting with the people and groups who are interested in, or affected by, proposed changes to an area, and obtaining expert advice from relevant councils and government agencies. It can involve informal, casual and innovative processes.

The *Guidelines* identify the following key factors that have been carefully considered in the development of the engagement strategy for 105 Miller Street:

- Plan early in the project scoping phase
- Engage as early as possible to enable potential issues to be identified, avoided or managed
- Ensure engagement is effective including providing clear information people need to understand the project and its impacts
- Ensure engagement is proportionate to the scale and impact of the project
- Be innovative including consideration of multiple channels including in person, print and digital
- Be open and transparent about what can be influenced
- Implement community participation objectives including robust stakeholder identification, accessibility of information, inclusive opportunities for engagement, seeking to understand areas of concern, etc.

2.2 Local Government

North Sydney Council has developed a Community Engagement Policy and a Protocol. While these are primarily focussed on the responsibilities of Council, they do include helpful direction for how Council would like to see engagement conducted within North Sydney.

2.2.1 North Sydney Council Community Engagement Policy

In useful guidance for this project, the *Community Engagement Policy* defines the 'community' as:

- Residents and ratepayers/landowners
- Business owners and operators

- People who work in the local government area
- Visitors (including tourists and shoppers)
- Government agencies
- Users of Council services
- Local community groups and associations(including sporting, church and charity groups).

The Policy also identifies the following as guiding principles for the planning and conduct of community engagement:

- Focus and commitment – ensuring the purpose and rationale for the engagement is clear
- Resourcing – engagement projects are adequately resourced with staff time, funding, etc.
- Timing – engagement will occur at the appropriate time within the project cycle
- Inclusiveness, accessibility and diversity – all affected and interested parties will be encouraged to participate in engagement opportunities
- Provision of information – Information to support the engagement process will be accurate, unbiased and enable people to form sound opinions
- Responsiveness and feedback – regular updates will be provided
- Evaluation and continuous improvement – engagement will be evaluated and outcomes used to better inform future decisions.

2.2.2 North Sydney Council Community Engagement Protocol

The *Community Engagement Protocol* is a companion document of the Policy describe above. The Protocol document also includes a five step engagement process:

- Identify stakeholders and issues
- Assess the level of impact and engagement required for the project
- Determine appropriate engagement methods
- Prepare and implement an Engagement Strategy
- Evaluate implementation of the Engagement Strategy.

These five steps have been used as the framework for the engagement approach to 105 Miller Street.

3.0 Methodology

With the NSW Department of Planning, Housing and Infrastructure's 2024 *Undertaking Engagement Guidelines for State Significant Projects* and Council engagement policies as guides, the methodology for community and stakeholder engagement for 105 Miller Street was informed by the following considerations and guidance:

- Stakeholder identification with consideration of Council's approach to the definition of a community as including residents and ratepayers/landowners, business owners and operators, people who work in the local government area, visitors (including tourists and shoppers), Government agencies, users of services and local community groups and associations
- Use of a variety of engagement techniques to ensure that the various stakeholder groups have different ways to provide feedback and input and that options for electronic/online and face to face communication are available
- Timing of engagement activities to enable community and stakeholder engagement feedback to be considered prior to submitting a development application
- Ensure that the process establishes clear parameters and there is openness and transparency about what can and cannot be influenced through the engagement process
- Provide clear and accurate information about the project including maps, images, and plain English wording
- Ensure that the engagement process is proportionate to the scale and impact of the project.

In addition, the five key engagement steps identified in North Sydney Council's Community Engagement Protocol were used to develop the engagement approach for 105 Miller Street in the following ways.

Step	105 Miller Street Approach
Identify stakeholders and issues	Consideration of geographical and interest-based groups. As a CBD site stakeholder analysis recognised CBD workers and property owners as critical. Residential stakeholders were also present. Given the history and location of the project both community and business groups and government agencies and organisations were identified as key.
Assess the level of impact and engagement required	Direct contact made early in project timeline with Council, key resident and business groups to assess initial level of interest.
Determine appropriate engagement methods	A combination of direct approach and invitations for meetings and briefings were offered key stakeholder groups (community, business and government). Given the CBD location an extensive letterbox drop to local business and residences and a drop-in session on site to attract CBD workers and passers by was identified as an appropriate strategy.
Prepare and implement an Engagement Strategy	Engagement Strategy based on stakeholder analysis, identification of issues and interest shown in project from key stakeholder groups. A variety of engagement techniques proportionate to scale of impact of project were included.
Evaluate implementation	To be completed. Note that engagement undertaken to date has been pre-SSDA lodgement.

3.1 Stakeholder Identification

Key stakeholders are considered to be those people or groups who are likely to have a strong interest in the project and/or be impacted by the project in some way. These groups of stakeholders may be based on interests (i.e. for this project groups with an interest and expertise in heritage) or be place-based (i.e. the residents and businesses in closest proximity to the project).

For this project key stakeholders can also be broken down into two further categories:

- Community and business
- Government agencies, organisations and advisory bodies.

The following table shows key groups consulted in each of the two broad stakeholder categories.

Table 1: Key stakeholders

Community and business	Government agencies, organisations and advisory bodies
Site neighbours – Victoria Cross, 1 Denison Street, owners and leaseholders of buildings on Miller, Denison, Walker and Berry Streets and Pacific Highway	North Sydney Council – Planning Department
Site neighbours – residential. Strata Manager and residents of Alexander Apartments and other residential buildings in the vicinity (including south of Pacific Highway)	North Sydney Council – Community Engagement Coordinator
Local businesses	North Sydney Design Excellence Panel
Lavendar Bay Precinct Committee	Heritage Council
North Sydney Business Chamber	Government Architects Office
Committee for North Sydney	Transport for NSW and service providers

3.2 Engagement Process Summary

The engagement process for the project included a combination of direct presentations to key stakeholder groups, large scale newsletter distribution and offers for direct and individual briefings for those interested. The drop-in session was located and timed to attract local residents and businesses (invited through the newsletter distributed to over 2,000 premises ten days in advance) and workers and other passers-by (in the North Sydney CBD).

The key steps undertaken as part of the community and stakeholder engagement process is summarised in the following table.

Table 2: Engagement process

Activity	Group	Purpose	Timing
Presentation of concept to North Sydney Council	Council	To introduce the project	August 2024
Briefing and presentation	Heritage Council	Mitigation of flooding, sympathetic façade design, in principle support for demolition of existing Denison Street wing and construction of new building	September 2024
Formal pre-DA meeting	Council	Detailed discussion of DCP requirements, character statements, zoning, urban design, traffic, heritage, flooding, car parking, public domain interface	October 2024
Design presentation	Design Excellence Panel	Built form and scale, context and neighbourhood character, heritage, sustainability, Country, landscape, amenity	October 2024
Email and phone calls to Council's Community Engagement Coordinator	North Sydney Council	To discuss engagement approach and seek views/feedback from Council	October 2024
Introductory letter	Lavender Bay Precinct Committee	Introduction/overview of project. Also included offer to provide individual briefing	October 2024
Introductory letter	Committee for North Sydney	Introduction/overview of project. Also included offer to provide individual briefing	October 2024
Introductory letter	North Sydney Business Chamber	Introduction/overview of project. Also included offer to provide individual briefing	October 2024
Presentation and discussion	Heritage Council	In principle support for Denison Street wing, repair of curtain wall, open air stair to Brett Whiteley Place, Miller Street forecourt, conservation of key heritage features of Miller Street wing	November 2024
Presentation and discussion	Heritage Council	Miller Street ground floor elevation, curtain walling significance,	December 2024

Activity	Group	Purpose	Timing
		retention of strong heritage interpretation	
Newsletter distribution	Hand delivered to 2007 premises in the surrounding area including 1541 business addresses (see Appendix 1)	Overview of project, invitation to drop-in sessions	January 2025
Email with newsletter and invitation to drop-in session	Lavender Bay Precinct Committee	Overview of project, invitation to drop-in session	February 2025
Email with newsletter and invitation to drop-in session	Committee for North Sydney	Overview of project, invitation to drop-in session	February 2025
Email with newsletter and invitation to drop-in session	North Sydney Business Chamber	Overview of project, invitation to drop-in session	February 2025
Drop-In Information Session (held on site)	Local residents and businesses	Project information, including drawings, plans, 3D renders etc. (see Appendix 2)	February 2025

Figure 4: Community Drop-In Session



Image: ATX Consulting

4.0 Community feedback

Consultation for projects such as 105 Miller Street are focussed on ensuring that, as much as possible, all stakeholders with an interest in the project are informed about the project and have an opportunity to provide input should they wish to. To achieve this, community and stakeholder engagement efforts combine both broad-based communications and specific and targeted invitations to key stakeholder groups.

For 105 Miller Street, key stakeholder groups were initially contacted directly with an invitation to participate in briefings or presentations about the project (October 2024). Limited interest was shown in the project from community or business representatives based on these initial communications. This initial communication included letters and offers of briefings to precinct committee, business chamber and other committees and groups with an interest in North Sydney.

In an attempt to ensure interested parties had an opportunity to participate in the process, additional direct invitations for briefings and invitations to the drop-in session were sent directly to key groups and organisations again in February 2025. This included direct communications with and invitations to:

- Alexander Apartments Strata Committee
- 1 Denison Strata Committee
- Lavender Bay Precinct Committee
- Committee for North Sydney
- North Sydney Business Chamber.

Newsletters with invitations to the drop-in session were also circulated to over 2,000 premises (business and residences) in the general area bound by Berry Street to the north, Walker Street to the east, Blue Street to the south and William Street to the west.

Despite this, direct participants in the community drop-in sessions were few. Five people attended in person. The low turn out may be related to:

- The CBD setting for the site with few residential neighbours
- An acceptance that the proposal was appropriate for the site
- Some of those who did attend had participated in group or strata meetings prior to the session where the proposal was discussed and were speaking on behalf of a larger group
- General consultation fatigue possibly due to participation with the previous DA for this project and/or other projects that were happening in and around North Sydney at the time (the Warringah Freeway off ramp project had attracted a large amount of community attention and participation).

Given this, the community and stakeholder feedback reported here should be treated with some caution.

With those limitations in mind, the key issues to emerge from the community engagement process included:

- Traffic
- Wind tunnel effects

- View impacts
- Construction related impacts
- Site activation
- Street frontage enhancements
- Other general design comments.

4.1 Traffic

Traffic issues raised in the consultation process by community members were primarily related to Denison Street and how traffic would flow and be managed in that area. It was recognised that the docking facilities for 105 Miller Street would be moved internally and this was considered to be a positive change. The key issues raised were primarily how traffic movement in the Denison, Mount, Spring, Little Spring and Walker Street area would be managed.

Residents of the Alexander Apartments at Denison and Berry Street stated that they already experienced some issues accessing the car park of the building that is located on Denison Street.

The issues raised will be addressed as much as possible in the Traffic Study conducted as part of the development application. It is also noted that some of the issues involve wider precinct considerations that fall beyond the direct remit of this project to address.

4.2 Wind tunnel effect

Participants in the consultation process recognised that the creation of a wind tunnel effect in the North Sydney CBD was an issue of cumulative impact. Participants noted that wind tunnel effect was an existing issue along Denison Street. The key feedback was focussed on trying to ensure that the development of the 105 Miller Street site would not exacerbate existing conditions and contribute to an additional or worsened wind tunnel effect.

Figure 5: Community Drop-In Session



Image: ATX Consulting

4.3 View impact

Concerns about view loss were raised by a resident of the Alexander Apartments building located at the intersection of Denison and Berry Street. This resident's view was that the proposed building on the Denison Street frontage of 105 Miller Street would impede views from Alexander Apartments towards the western harbour area. The Visual Assessment Study that will accompany the SSDA for this project will analyse and assess the impact of this potential view loss.

While not a view loss issue, the same residents raised concerns about reflected light from the proposed building (Denison Street wing) reflecting back to the Alexander Apartments and negatively affecting residents there.

4.4 Construction impacts

Residents of the Alexander Apartments also raised issues about construction impacts and how they had lived in what felt like a construction zone for an extended period with 1 Denison Street and the Victoria Cross developments occurring over recent years.

Concerns were raised about noise, vibration, truck movements and pedestrian and vehicle access.

Construction impacts are another example of cumulative impacts that will require careful management in the future to address resident and local business concerns. The elongated period of construction occurring in the precinct does diminish local residents' and businesses' capacity to cope with continued change and disruption. The Construction Management Plan for the project will need to consider both the direct and cumulative construction impacts of the development of 105 Miller Street.

4.5 Revitalisation of the site

Participants in the consultation process spoke positively about the opportunity to renew and reactivate what was recognised as an important gateway site in the North Sydney CBD. Views were expressed that a vacant building at this location provided no benefit to the local community and local business and that the reactivation of the building and the surrounding spaces was an important outcome of the proposal.

There was interest expressed in how the redevelopment of the site could be used to introduce a greater range of retail and service offerings in the area with the view expressed that there was currently a lack of variety in the area. There was also the view expressed that introducing a student population on to the site through a tertiary institution may help to diversify activity in the area and provide a more vibrant and diverse atmosphere in the CBD.

4.6 Enhancements to public domain

In addition to the general reactivation of the site as a commercial/educational building, participants in the consultation process also spoke favourably of the proposed enhancements to the public domain that they saw as resulting from the project. These comments focussed on improvements to how the building addressed Brett Whiteley Place including the introduction of the steps from the plaza into the building. Comments also referenced the proposed Miller Street forecourt area and the stronger relationship between the street and the building planned for that frontage.

Figure 6: Proposed Brett Whiteley Place interface from ground



Image: FJC

4.7 General design

It is noted that the Government engagement process had a strong focus on heritage and design quality.

Community participants in the drop-in session were generally supportive of the design and recognised the design quality of the proposal. The treatment of both Brett Whiteley Place and the Miller Street forecourt were viewed favourably and seen as contributing positively to the public domain.

Participants acknowledged the importance of rejuvenating the building and repairing some of the building features that were no longer safe such as the tiled façade on Brett Whiteley Place.

The community members who participated in the engagement process did not have a strong attachment to the architectural style or heritage value of the existing MLC building. They did, however, appreciate what they saw in the proposed design of the new buildings to honour and reinterpret the design qualities of the existing building.

5.0 Conclusion

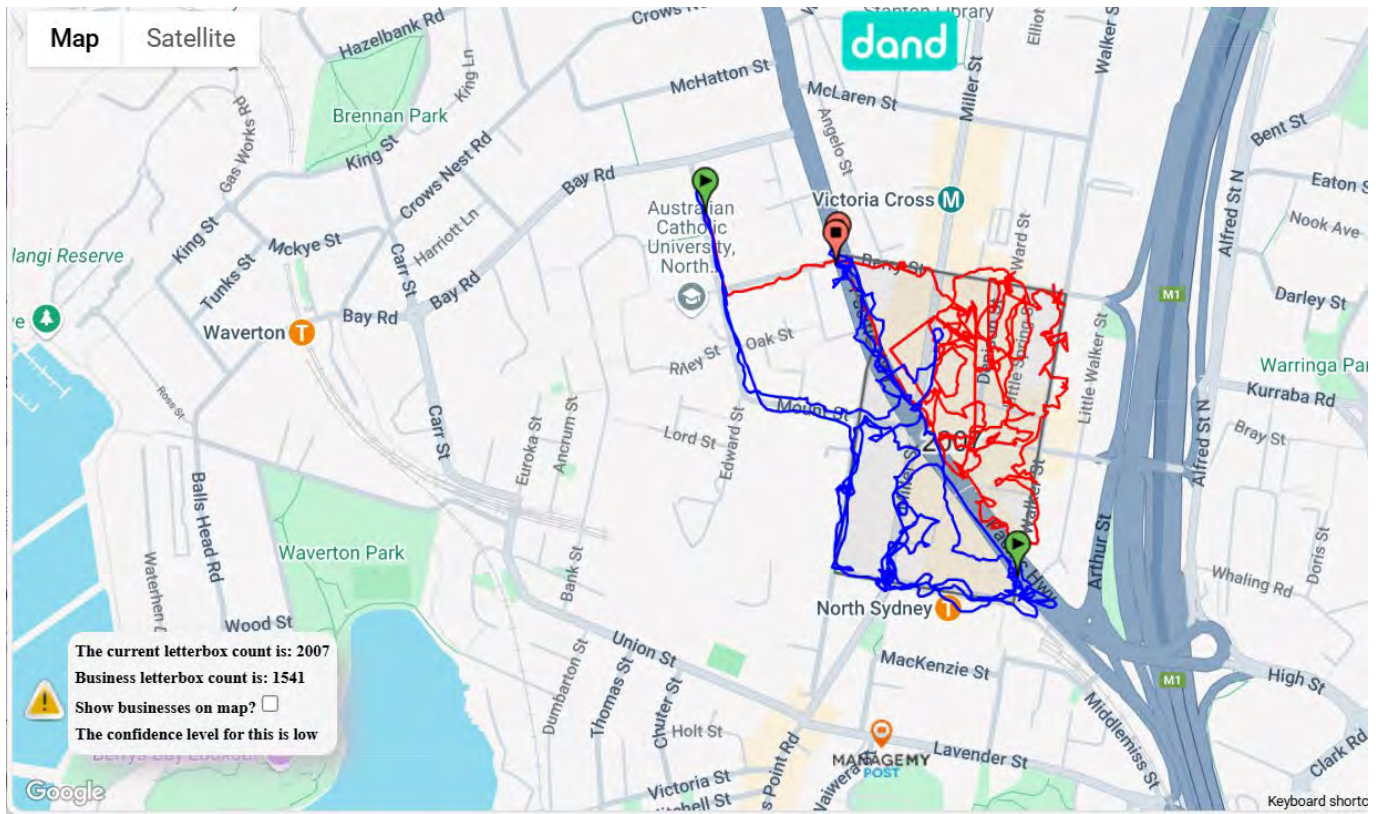
The community and stakeholder engagement process for this project has focussed on both community and business stakeholders and government agencies, organisations and advisory bodies. The previous proposal for the site provided a good indication of the groups and organisations who had strong interests in the project. This engagement process aimed to ensure that those groups had an opportunity to participate in the current planning proposal.

The government engagement process had a strong focus on heritage and design quality.

The key issues raised were through the community engagement process were:

- Traffic
- Wind tunnel effects
- View impacts
- Construction related impacts
- Site activation
- Street frontage enhancements
- Other general design comments.

Appendix 1: Newsletter Delivery



Distributor(s) left one notification in a visible and secure location within the lobby of the following addresses:

- 51, 53, 65 Berry Street
- 100, 161 Miller Street
- 1, 2 Elizabeth Plaza
- 80, 100 Mount Street
- 1 Denison Street
- 100, 110, 118, 122, 124 Walker Street
- 111 Pacific Highway

Appendix 2: Drop-In Session Display Boards

105 MILLER ST OVERVIEW



The owners of 105-153 Miller Street (the commercial real estate and property development company, Investa) are preparing a development application for the adaptive reuse and redevelopment of the site.

The Miller Street site includes what is known as the MLC Building that was designed by Bates Smart and McCutcheon and built in 1957. fjcstudio, the leading architect and Investa is seeking to rehabilitate the MLC building, expand the floor area and introduce an educational (tertiary institution) use on the site.

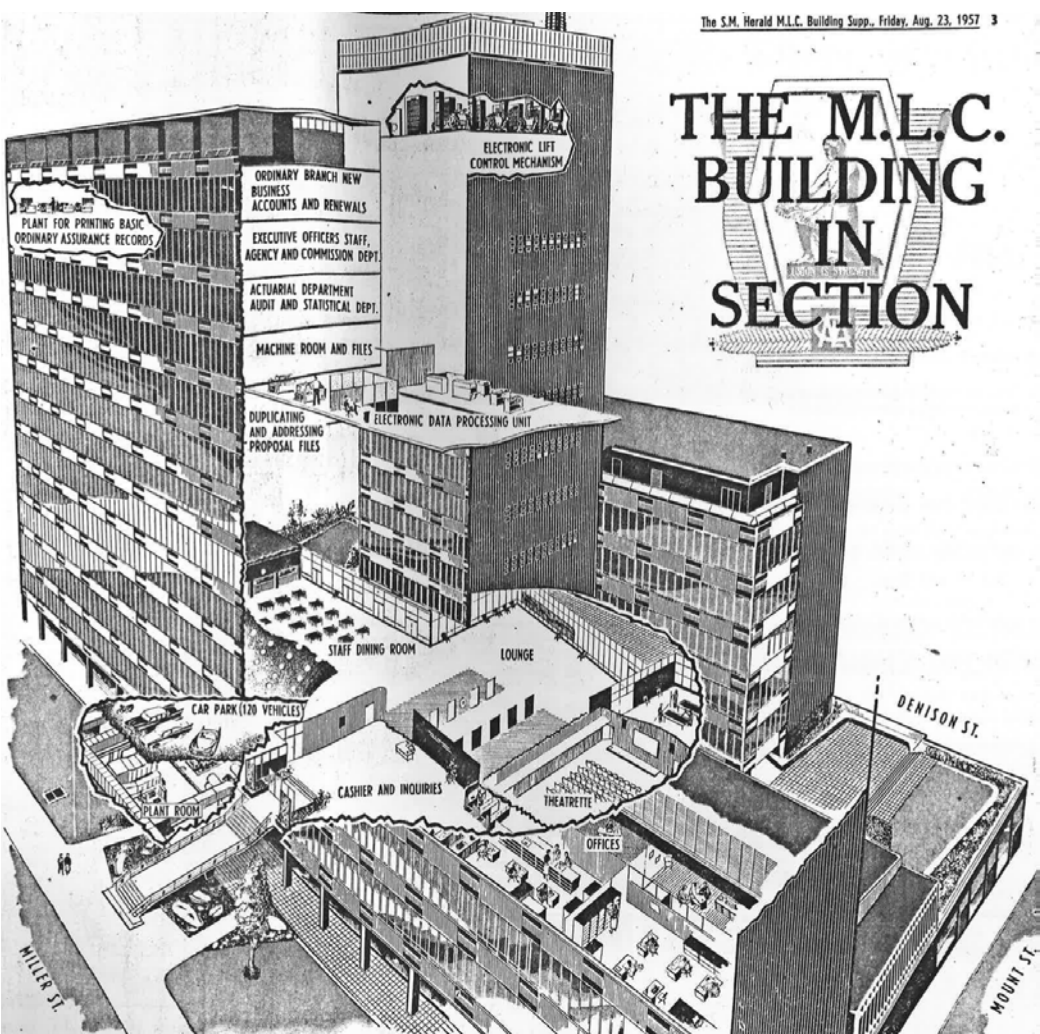
105 Miller Street is listed as an item on the State Heritage Register.



105 MILLER ST HERITAGE

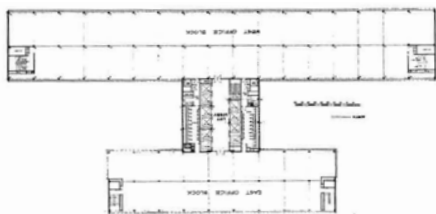


Photograph of Pacific Highway with MLC Building in the background Frank Hurley, *Sydney a Camera Study* (1958 Edition)



Extract from MLC _ SMH building supp. 23 Aug. 1957

105 Miller Street, built in 1957, was the first high-rise building in North Sydney. Designed by 'Bates, Smart and McCutcheon', the 59-meter-high tower drew inspiration from the 1952 Lever House in New York. The building's modern design was notable for its use of a curtain wall, and it was the first high-rise in Australia to incorporate modular units and an inbuilt public plaza. The modern development and architectural philosophies employed in its construction made it the largest office block in Australia for several years, as well as the tallest building in North Sydney. This milestone became a watershed moment in North Sydney's future development, with the Mayor of North Sydney, William Brothers, commenting that the MLC's design would mean that "the northern side of the harbour will eventually develop into the commercial centre of Sydney."

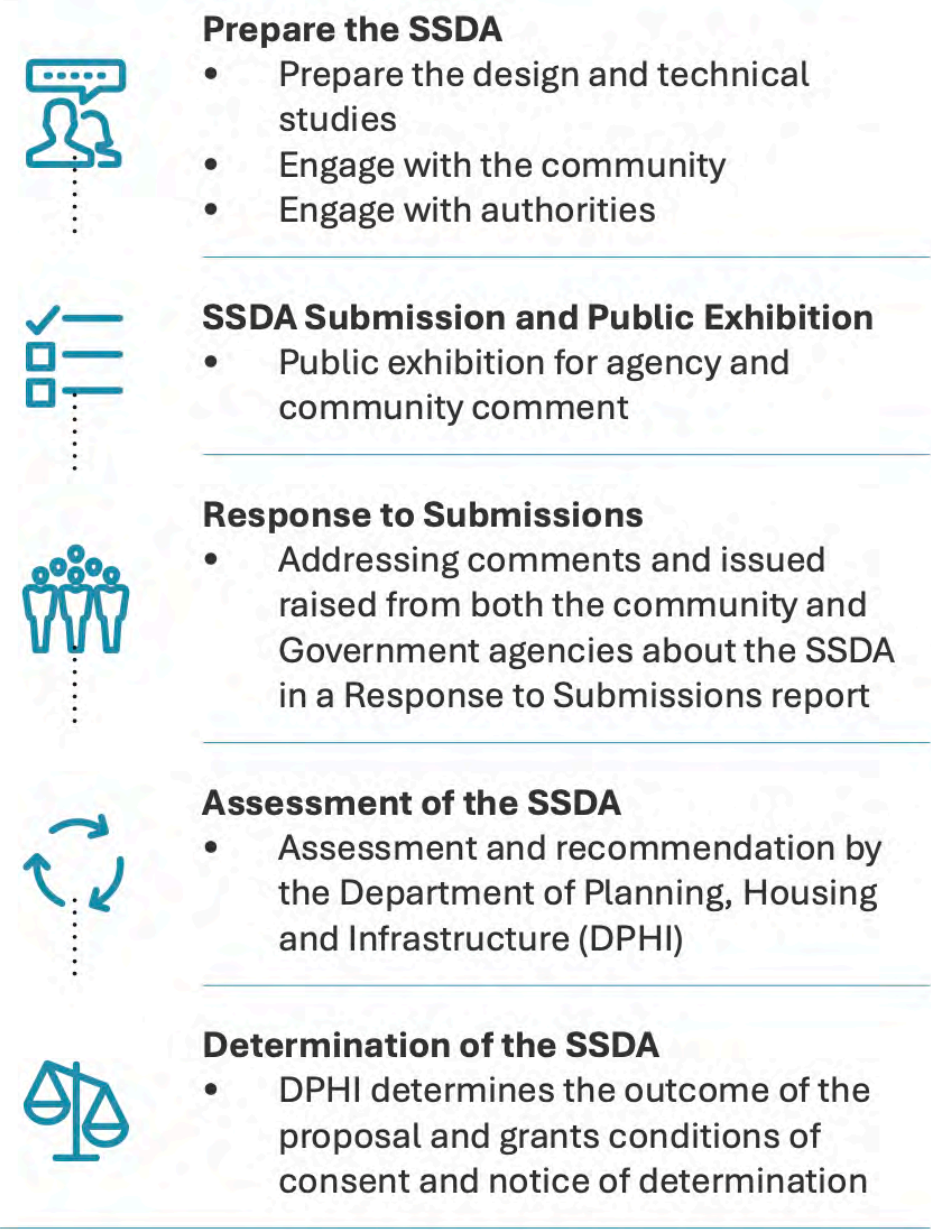


Extracts from Tall Buildings 1945-1970: Australian Business Going Up

105 MILLER ST DESIGN PROCESS

Planning process

An education establishment with a value of over \$20 million is required to go through the State Significant Development application pathway to be undertaken in 2025.



More information on the State Significant Development Pathway can be found on DPHI's website:

<https://www.planning.nsw.gov.au/assess-and-regulate/development-assessment/planning-approval-pathways/state-significant-development>

TWO OPTIONS

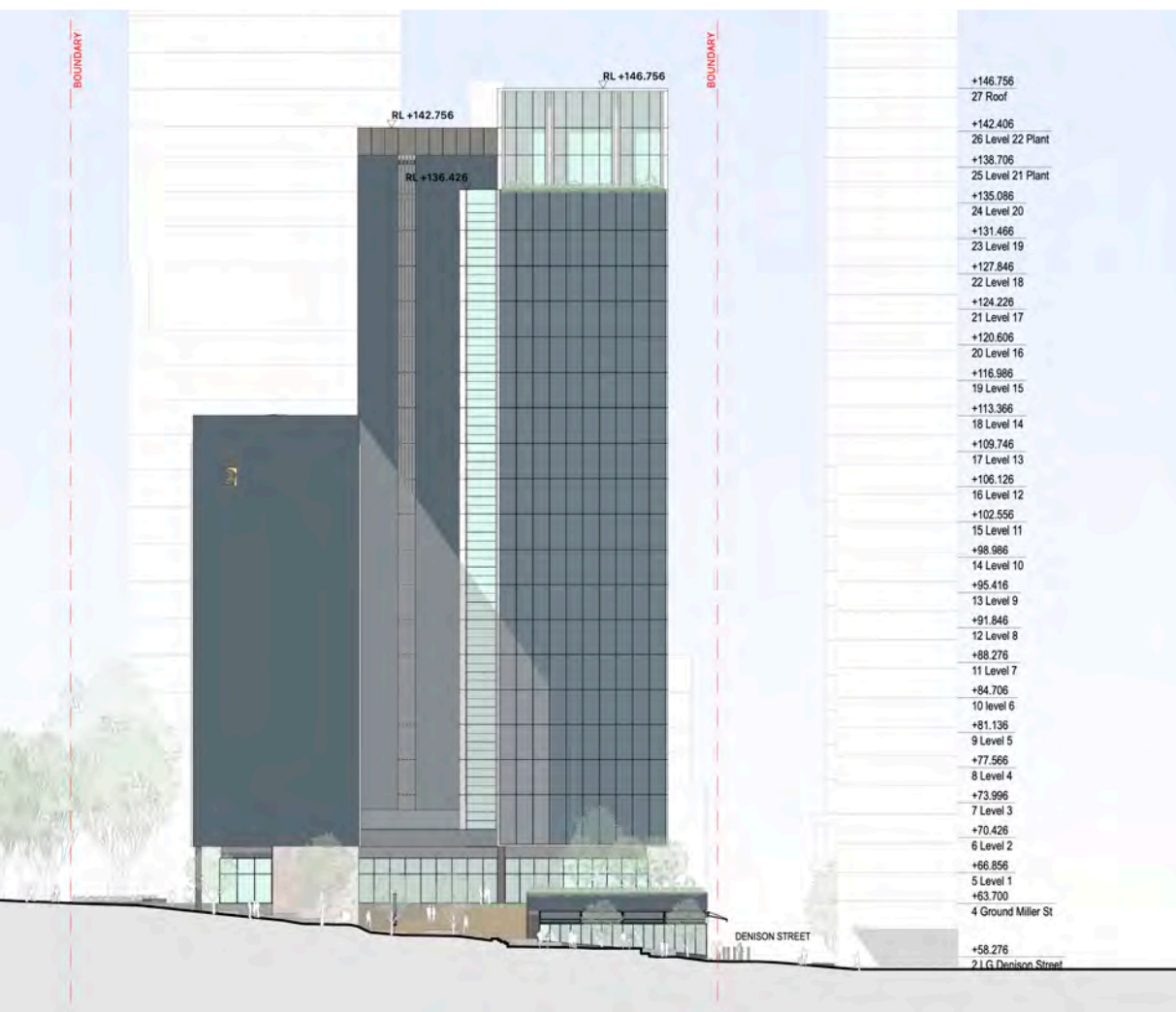


EDUCATION

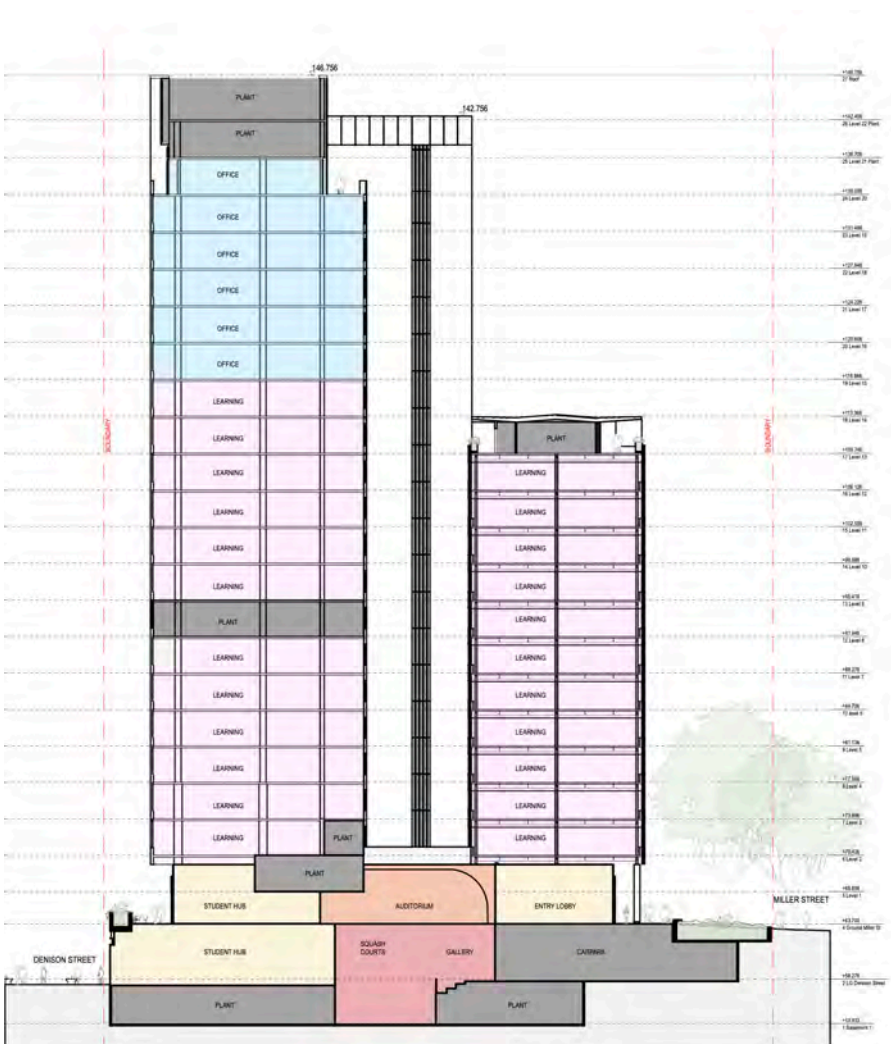


COMMERICAL

105 MILLER ST SECTION

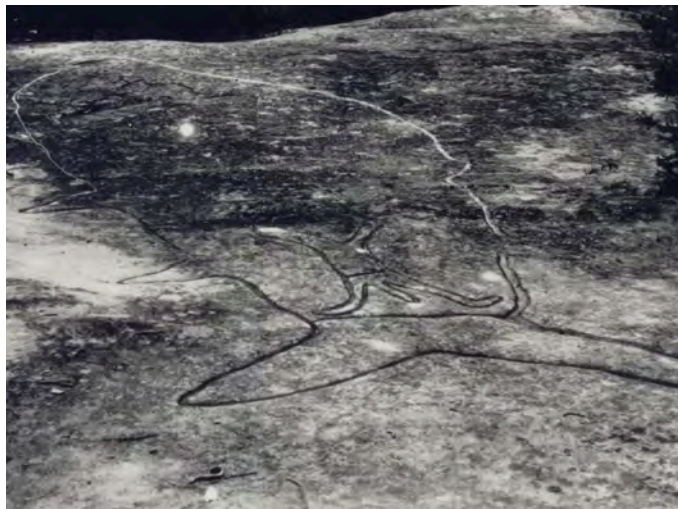
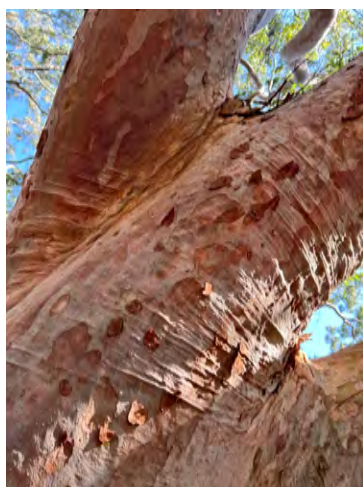
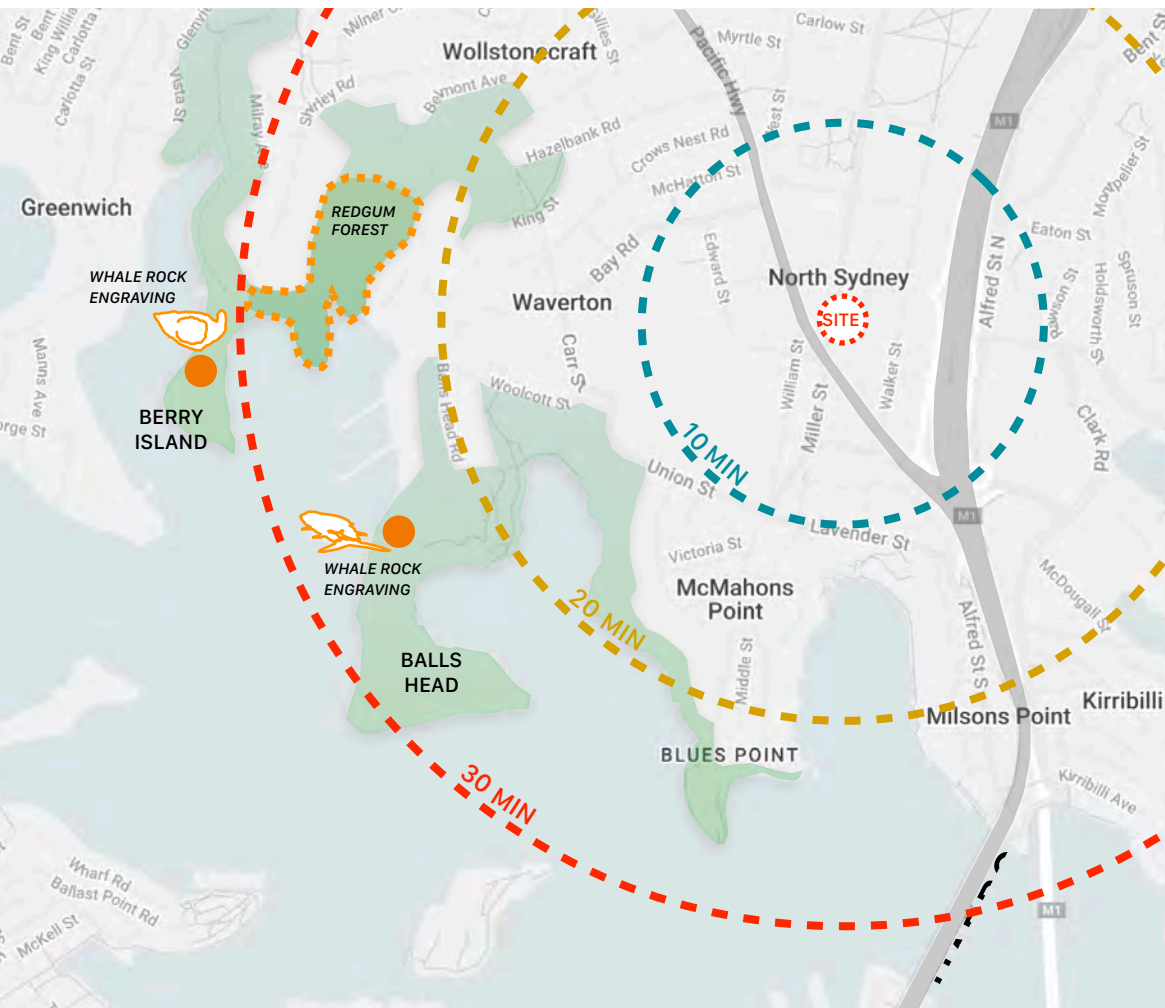


ELEVATION SOUTH



SECTION

BRETT WHITELEY PLACE AND CONNECTING TO COUNTRY



105 MILLER ST FORECOURT



DENISON ST



DENISON ST PODIUM

