

Wollstonecraft Precinct Submission
Victoria Cross Over Station Development

Concept SSD DA
Modification Application

Planning Report

It is noted that this planning report is for a modification of the Concept SSD DA Application which was granted approval by the Minister of Planning on 18 December 2018.

Wollstonecraft Precinct opposed, at the first public consultation stage in mid 2018, that Development Application lodged by Sydney Metro. It continues to oppose this later Modification Application from Lend Lease and Sydney Metro, which differs in no significant way from the earlier proposal other than to seek even more floor space by reduction of the “so-called setback on Berry Street” from 5 metres to 4.5 metres and a massing of the tower blocks within the approved envelope.

Our comments relate mainly to the Planning Report, but they also are critical of the use of the building floor space as it impacts upon the almost total absence of public amenity within the building which has been the outcome of the public feedback on the first exhibition in 2018. Although the commercial contract has been finalised, it is within the power of the government to modify the uses in exchange for a change (reduction) in the payment made to government. Any loss of up-front payment would be recovered many times over by a greater use by the public which inevitably leads to more economic activity and community well-being. We ask that these important matters are seriously considered in a whole of life benefit.

Broad, high level comments:

This proposal remains a significant ‘missed opportunity’ to create a ‘civic heart for North Sydney, revitalising what has become a drab City Centre where people and civic life have been missing for decades. In the only part of the inner city with lots of sunshine and minimal midday shadowing – and with the likelihood of that continuing to be the case due to the height of the school buildings and hotel opposite the site to the north – the opportunity will be lost to create a significant, central open area as a focal point for current and future developments.

The opportunity will be lost to create a building which facilitates a sense of openness and public space at street level, for example like the effect at East Circular Quay. The opportunity will also be lost to create a more integrated whole-of-block redevelopment by working in with adjoining landowners on a common, much larger scale modernisation above and around the new railway station. This could have transformed the entry and exit strategies for commuters; and significantly improved the first up reaction of visitors on arrival in North Sydney City Centre.

The opportunity will be lost to create a sensible egress and exit for the thousands of commuters travelling into and out of this station each day. They are going to be routed down narrow laneways which also serve as delivery points for trucks and underground parking access for other tall buildings or get put out onto the street to stand on a regular width footpath and wait for the traffic lights to change. Indeed, there does not even appear to be the nous to continue the existing underground access to the North Sydney rail station

by building a 100m underground link on the Miller St side of the building and parallel to its sole neighbour to the south, so that in bad weather, or if people have mobility issues, the link can be done at level and without getting out into the weather.

This sense of a massive lost opportunity is all pervasive and makes a mockery of the marketing nonsense in the accompanying documents.

Specific comments on the EIS documents:

1. The documents state *“The OSD building will be a catalyst for positive change, through the creation of large-scale civic spaces which will reinforce the ambitions of the North Sydney Council’s masterplan”*.
This is a bizarre and untrue statement. The proposal does NOT create any “large scale civic spaces” at all. The 4,900 workers in the building and 15,000 daily metro commuters to the station will contribute negatively to the pedestrian congestion on the already very limited footpaths and public domain space in Miller Street and in the centre of the CBD.
2. The documents state *“The OSD building will maximise integration of the station and associated public domain, improving connectivity for the surrounding community living, working or visiting the area.”*
This is untrue. The project does not address the integration with the MLC building next door with much lower level pedestrian spaces along Miller Street and the existing small café which projects into the proposed public plaza – let alone any linkage to the exit from the existing North Sydney railway station plaza.
3. The documents state *“The OSD project is part of fully integrated transport system”*
This is untrue. The Victoria Cross Sydney Metro station does not integrate with the heavy rail line or the existing rail station in North Sydney. It happens to independently arrive into the same space. There is also no discussion in the EIS on how it will integrate with the buses which are a major transport mode for commuters in the surrounding suburbs not serviced by rail lines. We do not even know where taxis might pull up.
4. The documents state they have *“Designed (in the OSD) a podium which offers commercial and retail opportunities via thriving civic place”*
This is untrue. Where is the thriving civic place proposed? Commercial and retail spaces in a podium are NOT ‘civic space’. The narrow building setback in Miller Street definitely does not qualify as such, nor does the narrow laneway to Denison Street.
5. The documents state the OSD will *“Improve activation and amenity of North Sydney CBD outside of typical business hours providing active and safe public domain on weekends and in evenings.”*
This is highly unlikely. The concept design appears to rely on retail outlets based on food only. Currently most of the cafes and food halls in North Sydney CBD close on weekends and Greenwood closes on Sundays. This is because there is no critical mass of people to make them viable to be open on weekends. The potential cultural uses in the building, such as cinemas, exhibition spaces, bars and music venues would bring more people to the CBD and activate the area outside of regular work hours ... but there is no mention of any of these features being facilitated, let alone introduced. For example, the St Leonards plaza around that railway station - with only food retail outlets - is dreary and deserted on weekends which we don’t want to replicate in North

Sydney. We note that St Leonards plaza is under 2 massive residential towers and is adjacent to a major 24/7 regional hospital - and it is still unbelievably dull and deserted. It is the last place on earth that one would alight from a train on a weekend other than to journey somewhere else.

6. The documents state that *“the OSD will provide a high-quality built form which sits harmoniously within the context of significant built heritage”*
This statement is perversely untrue. How can a 168m high tower ‘sit harmoniously’ within the context of the Rag & Famish two storey hotel, the adjacent iconic MLC Centre, the beautiful historic post office and courthouse and the low-rise school buildings in the proximity?
7. The documents state the OSD will *“provide a built form that minimises overshadowing impacts to surrounding public spaces”*.
This is demonstrably untrue. It is a proven and undeniable fact that the 42-storey new tower will definitely further overshadow Miller Street and other existing public spaces in the CBD.
8. The documents state that the *“Consultation informed the public domain”*.
This is definitely untrue. There is no attempt in the proposal to offer significant public domain benefit on this State Government owned site in the very heart of North Sydney. It is now crystal clear that any ‘consultation’ - including this latest round of public briefings - has been a box ticking, window dressing exercise to justify decisions made before public comment was sought. There never has been the slightest glimmer of an intention to depart from the fundamentals of the original proposal.

It is abundantly clear the only interest the State Government and Sydney Mero seeks from this OSD is to maximise the desired uplift of commercial floor space and the financial return from this development.

9. The EIS states *“that it provides comprehensive justification for exceeding building height control”*.
This is a nonsense. There is no justification even offered as to why the development should be granted *additional* 1,500m² of floor space. It justifies the additional height and floor space on the achievement of more footprint and greater commercial floor plates achieved by a reduction in the setback to Berry St. and massing out of the higher-level floors above the podium. The department should categorically refuse any increase in floor space beyond the 60,000 sqm as previously approved.
10. The documents offer the community *“the Hub”* – an approximate 300 sqm L-shape space at level 2 to be used for community uses such as meetings, events or exhibition space and only to be available during office hours.
This is apathetic and offensive token gesture and very much not what the community was expecting from this significant State Government project on publicly owned land. This project is once in a lifetime opportunity for North Sydney to achieve a significant civic facility fully integrated with the major public transport infrastructure in the heart of North Sydney. And the government totally ignored the many sensible requests to do so in submissions offered on first proposal in mid 2018.

11. **In addition**, we note there is no discussion in the EIS about the Northern entry to the metro station and the lack of activation at all (by contrast to the southern portal) around the entry at the North Sydney Civic Precinct.

12. The EIS states *“There is also a number of existing public plazas and public recreation areas within the North Sydney commercial core.”*

This statement is false as there is not enough public open space currently provided for the local workers, school and university students and visitors. This State Government project will contribute 20,000 additional workers and commuters daily to North Sydney CBD without consideration of how the existing public domain will cater for this massive increase in population. Currently the footpaths and major pedestrian street crossings are significantly overcrowded to an unsafe level in this very same part of the City Centre. It is irresponsible of the State Government not to address this issue more thoughtfully in this proposal. For example, nothing unique or specific at all has been proposed for the largest concentration of high school students in Australia, who will use the station every weekday. Another opportunity to create something relevant and unique, completely missed.

Comments on the Public Domain Concept Plan.

1. This plan offers a widened footpath by about 2m along Miller Street, but then clutters it with raised grassed areas and series of ramps and fenced outdoor platforms in front of the retail shops.

The suggested approach is considered unacceptable and bad planning not to offer a level and generous plaza with trees and series of seats fully integrating it with the Council’s proposed widening of the existing pedestrian area in Miller Street.

2. The public Domain Plan does not offer any information on how the buses and bus stops will integrate with the metro station and how commuters will flow from one mode of transport to the other.

This is an extraordinary oversight/omission when the station is intended to be transformative of the transport options for residents, commuters and – increasingly – for overseas and domestic visitors and tourists.

Closing comments.

Despite all the documents and all the ‘public consultation’, there remain several important questions completely unanswered. These revolve around about how Lendlease and Sydney Metro envisage that basic retail offerings – geared mainly to the food and shopping needs of Monday to Friday commuters - will be adequate to also activate public spaces around the station after hours and on the weekends? We would like the relevant State Government and Council people to really look hard at other parts of Sydney and other cities for relevant, workable ideas ... and feed these into the mix.

This process, although promoted as being one that consults widely with the community is a farce because it has ignored completely any of the submissions made on the first application in mid 2018, has now further increased the benefit that flows to the State government (at the expense of the benefit that could have flowed to the local community) and may as well have been done in a totalitarian state. All that has been achieved is to provide employment to a large number of public servants who diligently

perform their allotted tasks before those at the top ignore advice including from the community, and then make executive decisions based on financial outcomes only. It is regrettably, shameful.

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