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Attention:
Director, Key Sites Assessments
Department of Planning and Environment
Application SSD_8874

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**Application for Integrated Station Development for Victoria Cross Station
Concept State Significant Development May 2018 -
Submission in response from Waverton Precinct**

Waverton Precinct supports the addition of improved heavy rail transport into Sydney in advance of the population expansions predicted by the Greater Sydney Commission generally; and specifically supports the creation of a railway station in North Sydney as a part of the new Sydney Metro line.

Having said that, the Precinct is of the view it is an opportunity lost that the two railway stations are unintegrated, and that there is to be no simple, at level, weather-proof connection between the existing North Sydney station and the new Victoria Cross station.

Such a link could be achieved simply from the existing corridor which passes under the Pacific Highway.

The Precinct notes the proposed Integrated Station Development by Sydney Metro covers the simultaneous construction of a combined metro station and an above station office building. The Over Station Development (OSD) seeks approval for 233m high 42 storey building with GFA of 60,000m² and 12.46:1 FSR including seeking approval for the building heights, setbacks, floor space, car parking, access and land use and public domain works.

The Waverton Precinct has reviewed the EIS for the Integrated Station Development for Victoria Cross Station in North Sydney and **strongly objects to and rejects** this proposal. While clearly an underground rail station needs a surface exit, this proposed integrated development is a ploy for the developer to seek to bullet-proof their commercial position by making the approval of an oversized office building tied to the access to a much-needed and overdue piece of transport infrastructure.

Alternatively, for example, the station could exit into a plaza, a town square, or into a new parkland. Any of these in our view would be preferable the proposed exit into the foyer of an anonymous office building - especially given the existence of a park

strip already next door outside the MLC Centre – or dumping commuters into a back lane, as proposed.

The rejection of the proposed OSD development is based on the following thinking and the listed specific reasons.

The North District Plan for the Harbour CBD (North Sydney CBD) sets housing targets for North Sydney at 3,000 new dwellings and additional 822,496m² of commercial office space. The job growth is predicted to increase from 60,400 jobs in 2016 to 81,500 jobs in 2036 adding 21,100 additional people using local services and public spaces in the North Sydney CBD area. The Plan also predicts 196,000 population growth and that 20% of the population will be over age 65. This will have a dramatic impact on the pressure in North Sydney CBD on quality public spaces, facilities and the need for cultural and social interaction.

One of the key objectives of the North District Plan is to deliver “high quality civic and public spaces which can be utilised for a variety of cultural and entertainment activities and designing places for people”. This is a feature notably lacking in current the North Sydney CBD – indeed, it has long been the butt of many jokes for decades about just how ‘dead’ the current North Sydney CBD is at night and on weekends. The proposed space achieves almost nothing towards this goal and will be a complete lost opportunity, in its current form.

The North Sydney CBD is the fifth or sixth largest in the country. It currently ‘caters’ for a huge number of office workers, university students, school children and residents on overcrowded suburban-standard street footpaths and a suburban residential grid street layout. Workers struggle to find any outdoor quiet place in the sun to eat lunch or to relax. School children have nowhere to congregate, mix, socialise – let alone play. There are very limited public outdoor spaces, no cultural or entertainment facilities, no sports facilities, no public gardens or parks, and no walking trails in the current North Sydney CBD. The Pacific Highway slices through the CBD at surface level and the Warringah Freeway provides a solid barrier to the eastern side of the CBD. Amazingly, in a suburb less than a single kilometre from the Harbour and with a hilly terrain, it is really hard to get a view of the water at all at street level from most parts of the North Sydney CBD.

The Sydney Metro’s Victoria Cross station in North Sydney CBD should be a once in a generation opportunity for a major transformation of one of the largest commercial centres in Australia - which currently only has any life between 9-5 on weekdays, by changing it into a vibrant and attractive centre which attracts people to enjoy its working, educational, recreational, retail and civic attractions.

The Sydney Metro documents talk grandly about these opportunities, which it clearly recognises. For example, it talks about how the new rail line is to create “an exciting opportunity to integrate global best practice and innovative thinking to develop a sense of place” but then it does absolutely nothing to realise any of these aspects. Instead, it creates yet another oversized building on the last remaining space for a proper parkland within the CBD, featuring only more retail shops, a bland forecourt and no public amenity, and empties its commuters into tiny back laneways which are

shared with supply trucks and commuters keen to find the last free car parking spot or to access a Council car park.

With the planned large increase of worker population in North Sydney CBD it is critical that this proposal for the OSD, in the heart of the city, instead should offer significant public open space and some public cultural facilities as part of the street level interface. Perhaps as well it could also do something specific and creative for the thousands of school children who will go through this station and the adjacent streets each day.

Within the thinking of these general observations as outlined above, there are a series of specific objections which are detailed below.

1. We object to the lack of open space and public domain

The North Sydney community has lost the very successful and popular Tower Square development in the centre of North Sydney – the one place where people could relax in the sun and have lunch away from the noisy and crowded streets. What we are going to get in return is a very large commercial building with a few retail outlets - and importantly no quality public domain or community facilities at street level to activate this central location after hours or on weekends and to create a lively precinct for either workers, schoolchildren or university students, or the local residential community. It is important to stress that the Tower Square site's air space has been already sold and developing over this particular site may be considered as double dipping.

We would actually prefer that an open park be built on this site, linking to the open space outside the MLC Centre and the forecourt of the Beau Monde building, because it is the last site in the CBD that does not get significant over shadowing and it is unlikely to ever get overshadowing (because Monte Sant'Angelo school will presumably never go high rise) and which is not a wind tunnel. That makes this specific site very important. The Precinct would like the State Government and Sydney Metro to withdraw this proposal and concentrate instead on creating open public area above the railway station which, over time will be improved and further extended as new developments occur in Berry Street.

However that outcome seems unlikely at this stage of the process, unfortunately.

So, if the preferred option cannot be achieved, at a minimum the Precinct requests that the development over the Victoria Cross Metro Station complies with Council set back limits on Miller and Berry Streets to form a public square on the intersection corner which over time will be improved and extended as new developments in Berry Street are set back to the same limit as the current building at 79-81 Berry Street.

In this context we request that consideration also be given by the Council and State Government, or the Sydney Metro, to purchasing 65 Berry Street and integrating that site now into a better integrated development. It is currently advertising 5000 square metres for lease so obviously must be fairly empty at the moment.

2. We object to the apparent absence of any contribution to public life in the North Sydney city centre

In addition and regardless of the future of 65 Berry Street, Waverton Precinct request a significant community cultural facility be incorporated in the Metro building in place of the lazy default choice of more generic and unnecessary retail shops. The legitimate need for access to the highrise building should be minimised to lifts and a concierge desk with the remaining space a ground level being devoted to public thoroughfare and related public amenities.

We note that Tower Square was demolished as part of the price of the metro station. The city lost its most successful public space, where people gathered and which featured a variety of small business that can only flourish in such spaces. There appears to be no attempt in this proposal to replace the sort of successful gathering place which has been lost.

More significantly, if this project is to benefit the city centre and deliver some of the stated aims and objectives of the District Plan, where are the places for public life? The North Sydney city centre lacks all of these: a town hall, performance spaces, meeting spaces, cinemas, exhibition spaces, incubators, shared spaces, community offices, markets, and many more. The massive changes wrought by the construction of the metro site are exactly the opportunity to create some of these missing spaces which characterise all good cities. The massive increase in values – extraordinarily high on the site of the previous Tower Square – can at least make good what has been lost and beyond that make a real contribution to the city centre where an additional 4,000 people will work by 2021.

3. We object to the oversized floor plates

The site area of this proposal is obviously too small for this oversized commercial tower with its large floor plates. The proposed building envelope encroaches significantly onto the Miller Street and Berry Street setbacks as detailed in the existing North Sydney Council's planning controls. These street setback controls have been established to protect the winter sun access to the limited public outdoor recreation areas in the centre of North Sydney and they should be respected and complied with. The EIS does not include critical public views of the proposed OSD from Denison Street and from the eastern side of Berry Street which are essential to understand how the proposed building will fit into the urban context of North Sydney. We request that No 65 Berry Street site be incorporated into the OSD plan - if not purchased outright and included in a revised development application as suggested above - to the degree that it will achieve the required setback in Miller Street and to allow for the creation of a single, continuous, generous, sun filled public square on Berry Street to fully activate this important, central site for civic and recreation activities. In addition, we insist that the Miller Street setback established by the heritage MLC building must also be retained in any new development. We further note that the opportunity presented by the existing blind boundary wall of the MLC Centre building is not being used to best advantage in this Proposal, to push the massing of the building to the south of the site and so free up maximum sunlit ground space for the public.

4. We object to the inadequate width of pedestrian exit and access into the station

There is an inadequate width of cross block public link between Denison Street and Miller Street leading to the Metro station entry.

The EIS documents do not specify dimension of the cross link but it appears on drawings within the 18m setback from the MLC building and it incorporates retail and pedestrian metro station entry which is considered too narrow to allow for the 15,000 commuters who are projected to be streaming from the station in the morning peak. The width of this passageway needs to be significantly increased simply to cope, let alone to create any 'sense of place' as part of the experience.

There are no details shown of how will the OSD building meet the lower colonnade of MLC building and the new station level. It seems to us that the existing café structure which projects out from the MLC building should be removed as it would have a major negative impact on the commuter movements to the metro station.

5. We object to the false images of the OSD building

The artists' impressions in the Metro publications and the EIS present false images of a very generous station entry and spacious 3 storeys colonnade. The architectural plans and the physical model show no colonnade to Miller Street and only narrow pedestrian passage within the 18m wide setback from MLC building. This is very deceptive and misrepresents the reality of the proposed building's inadequate public domain around the metro station. The drawings also indicate a steady 'ratchet out' of the building so that it actually offsets the sight lines, sunlight and shadowing effects, and the visual set back which are required at street level. This architectural trick is completely unacceptable. It is also inconceivable that this building would not have significant shadowing implications for the existing open areas to its south – the MLC Centre open space and Brett Whitely Square - and could ruin their amenity.

To only focus on possible shadowing effects on the Greenwood Plaza area is to ignore the loss of sunlight which will be created in the streetscapes closer to this new development.

6. We object to the inadequacy of commuter links between stations, or bus interchanges

A major omission in the design of the OSD project is the future proofing for the underground link to Greenwood Plaza and the commercial building across under Miller Street. The link to Greenwood Plaza is considered by the Precinct absolutely essential as an additional public domain connection between the two rail stations in North Sydney and as high quality public shopping arcade catering

for the large number of existing and future workers and the local community. For example, how popular is the link under the QVB? This suggested link could become just as active and economically attractive an addition to the current North Sydney limited public domain and cater for any need for 'more retail outlets' in the overall development. Any retail outlets 'lost' from the redesign of the foyer of the new building to meet our suggestions would instead be located here.

Similarly short sighted is the complete absence of any mention of the likely bus developments in the immediate and foreseeable future, specifically but not limited to the likely routing of 30-50% of the B Line buses from the Northern Beaches being sent to terminate in North Sydney. There is zero recognition in this proposal that bus and train passengers in the North Sydney CBD may in many cases be the same individuals, trying to commute across the Harbour Bridge!

Likewise there has been no apparent consideration of the possibility of the need to make Miller and Walker Streets one way streets, or to possibly created bus only streets outside both railway stations, or to create a pedestrian plaza by closing the section of Miller Street between the Pacific Highway and Berry Streets completely. Of course we understand that is not a part of the OSD, but it is a part of the only marginally broader question of what happens around and adjacent to a new railway station in a busy CBD location. So, someone at the approvals end needs to be thinking about the OSD proposal in this broader context.

As an absolute minimum, the station platform 'box' should be required to allow the flexibility for future sub-grade connections on all sides.

7. We object to the failure to consider an important specific community – high school students

The Precinct is amazed that in the largest concentration of high school students in the entire country, this Metro proposal makes no mention of them and does absolutely nothing to cater to their needs at all - and treats them just as poorly as any office-bound adult commuter who works in North Sydney. Even an underground link to the northwest corner of Berry and Miller St would seem helpful for the 1500 students at Monte, rather than all crossing the street on the surface, but even something so obvious and easy as this has not been suggested.

This lack of any apparent thought for the huge number of school students using this station is a total failure of imagination by the proponents.

For all the grand language in the Metro publicity material about opportunity to create exciting spaces and design landmark buildings, this building breaks the existing set back limits, offers zero public facilities, and sends 15,000 train passengers per day off into tiny lanes – so much for any sense of 'creating public amenity' or 'enhancing a sense of grandeur' or of 'being in a memorable place' as they talk about in the documentation.

8. We object that no comprehensive Stakeholder Engagement details are included; and what issues were raised by the various stakeholders is unclear.

Despite what it states, the consultation is coming after the proposal is tabled. For example, the EIS lists consultation with the Waverton Precinct on the project, however the Waverton Precinct denies being consulted on this project in any informed or purposeful way. Similarly, there is no Public Domain Strategy included in this proposal, instead just a focus on the building envelope and pedestrian access with only some vague statements such as: “Deliver a high-quality built form that exhibits design excellence, is a landmark building and it responds sympathetically to the surrounding heritage buildings”.

The Precinct fails to understand how an overbearing 42 storey glass building is even remotely sympathetic to the 2 storey nineteenth century rendered brickwork hotel which will sit directly opposite it?

The EIS overview brochure additionally states that “*design excellence principles will support the placemaking and urban design requirements of creating vibrant public places for social and cultural interaction and contributing to the vibrant and accessible streets and open space around the stations*”.

These objectives have hardly been addressed, even in a passing manner, let alone been fulfilled in this proposal for Victoria Cross station.

9. We object about perceived Conflicts of Interest in the Approvals process

The Design Guidelines prepared by the NSW Government Architect are limited in their detail and scope. The EIS states that the Sydney Metro Design Excellence Evaluation Panel will provide independent evaluation: this is hardly possible if the panel will be chaired by the NSW Government Architect as the Government Architect works for the Minister of Planning.

Yet, we note the Premier has already publicly declared what a positive move she sees this current proposal as being to the future of North Sydney.

Conclusion

For all these reasons, Waverton Precinct strongly objects to and rejects this application by Sydney Metro and requests that all these concerns be considered by the Approval authority.

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