



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

22 June 2018

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

**The Wollstonecraft Precinct Committee Strongly Objects to the Applicant's
Proposal**

Introduction:

Wollstonecraft Precinct of North Sydney Local Government Area like most of the public, enthusiastically supports the addition of a metro rail transport into Sydney in advance of the population expansions predicted by the Greater Sydney Commission generally; and specifically supports the creation of a Metro station in North Sydney as a part of the new Sydney Southwest line.

The Precinct notes the Integrated Station Development proposed by the applicant covers the simultaneous construction of a combined metro station and an above station office building. The Over Station Development (OSD) seeks approval for a 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, carparking, access, land use and public domain works.

The Precinct has reviewed the EIS for the Integrated Station Development for Victoria Cross Station in North Sydney and strongly 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: no more, no less.

The Precinct is of the view that the North Sydney CBD desperately needs quality public and civic spaces and the only place we're likely to be able to achieve them is on land owned by the State Government incorporating the entrance to a Metro station.

The introductory messages from the Premier and the Minister for Transport both speak in glowing terms about the Sydney Metro project as if an endorsement of the applicant's proposal whilst barely mentioning that this EIS is an opportunity to the public at large to make informed comment on the environmental impacts of the project which have to be assessed within an unacceptably short time frame of 28 days.

Our objection to 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 822,496 m² 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 the current 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 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 difficult to get a view of the water at all at street level from most parts of the North Sydney CBD.

The Sydney Metro's proposed Victoria Cross station in North Sydney CBD must provide 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, 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 Metro 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 in the CBD, featuring only more retail shops 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 instead 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 outlined above, there are a series of specific objections as detailed below.

1. 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 more 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.

An open park should be developed on this site, linking to the open space outside the MLC Centre, because it is the last site in the CBD that does not get significant over shadowing and is unlikely to ever get overshadowing (because Monte Sant'Angelo will presumably not go high rise) and which is not a wind tunnel.

2. Oversized floor plate

The site area of this proposal is obviously far 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 help protect the winter sun access to the limited public outdoor recreation areas in the centre of North Sydney and they should have been respected and complied with in this application. The EIS does not include critical public views of the proposed OSD from Denison Street and Berry Street which are essential to understand how the proposed building will fit into the urban context of North Sydney. By any view, it does not fit at all.

3. 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.

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

4. 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.

5. No easy 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. By refusing this OSD application, many barriers to the construction of an underground link to North Sydney Station would be eliminated.

Similar short sightedness 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!

Likewise there has been no apparent consideration of the possibility of the need to make Miller and Walker Streets one way streets, or to create a pedestrian plaza by closing the section of Miller Street between the Pacific Highway and Berry Streets completely. The latter is our preferred option. 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.

Lastly, 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 an office-bound adult commuter who works in North Sydney. This is a total failure of imagination.

For all the grand language in the Metro publicity material about opportunity to create exciting spaces and design landmark buildings this proposal 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.

6. 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 we know that the Waverton Precinct were not consulted on this project at all. Why the applicant refers only to Waverton Precinct is further proof that consultation is being done to “tick the box”. 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 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 not been addressed and certainly not fulfilled in the applicant’s proposal.

7. Cost of Rejection of the Applicant’s Proposal

The only cost to the applicant of rejection of this proposal would be the loss of the “value capture” of the air space. Demolition and remediation costs are sunk in any case and therefore the government could achieve a hugely popular public benefit by saving the whole site for development of quality public space.

8. Benefit of Rejection of the Applicant’s Proposal

Benefits of rejection would include:

- The immediate ability to close Miller street and join it with this site
- An unparalleled public space similar to those in the Sydney CBD
- Plenty of sunshine for the thousands of workers and visitors in the North Sydney CBD
- Creation of a vibrant public place for social and cultural interaction and contributing to the vibrant and accessible streets and open space around the stations as stated in this EIS.

Conclusion

For all these valid and considered reasons, Wollstonecraft Precinct strongly rejects this application and requests that all our concerns be considered by the Approval authority when determining its decision.

John Hancox
Chair, Wollstonecraft Precinct