



PCU075028

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

Department of Planning
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Scanning Room

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Application for Integrated Station Development for Victoria Cross Station Concept State Significant Development May 2018

The proposed Integrated Station Development by Sydney Metro for combined metro station, Over Station Development (OSD) seeks approval for 233m high 42 storey building with GFA of 60,000m² and 12.46:1 FSR including approval for the building heights, setbacks, floor space, carparking, access and land use and public domain works.

I have reviewed the EIS for the Integrated Station Development for Victoria Cross Station in North Sydney and strongly reject this proposal.

The rejection of the proposed OSD development is based on the following reasons:

The State Government's 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.

The North Sydney CBD currently caters for a huge number of office workers, university students, school children and residents overcrowding street footpath and struggling to find an outdoor quiet place in the sun to eat lunch or to relax. There are very limited public outdoor spaces and no cultural or entertainment facilities in North Sydney CBD.

The Sydney Metro's Victoria Cross station in North Sydney CBD will be a once in a generation opportunity for a major transformation of the 6th largest commercial centre in Australia, from 9-5 office environment to a vibrant and attractive centre which attracts people to enjoy its working, educational, recreational, retail and civic attractions.

With the planned large increase of worker population in North Sydney CBD it is critical that this proposal for the OSD on the State Government owned land, in the heart of the city,

offers significant public open space and some cultural facilities as part of the street level interface.

1. The North Sydney community have lost a very successful and popular Tower Square development in the centre of North Sydney 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 few retail outlets and no quality public domain or community facilities at street level to activate this central area and create a lively precinct for workers and local community. It is important to stress that the Tower Square site's air space has been already sold and developing over this particular site is very much considered as double dipping.

Quality public and civic spaces are desperately need in North Sydney CBD 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.

Unfortunately, it is very obvious that the only criteria driving this OSD proposal is to achieve the highest possible value capture from this site by the State Government.

2. The site area of this proposal is obviously too small for this oversized commercial tower with large floor plates. The proposed building envelope encroaches significantly onto the Miller Street and Berry Street setbacks as set in the 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.

There is a need that No 65 Berry Street site be incorporated into the OSD plan to achieve required setback in Miller Street and to allow for the creation of a generous, sun filled public square on Berry Street to align with the setback of No 79-81 Berry Street property to activate this important, central site for civic and recreation activities.

Both of these setbacks must be complied with in any future development.

3. Inadequate public circulation.
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 15,500 commuters streaming from the station in the morning peak. The width of this passageway needs to be significantly increased.

There are no details shown of how will the OSD building meet the lower colonnade of MLC building and the new station level.

The 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. Inadequate view analysis.

The EIS does not include critical street level 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.

5. False and misleading 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.

6. The 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 in Miller Street. The link to Greenwood Plaza is 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 a large number of existing and future workers and the local community. This link/shopping mall could become very active and economically attractive addition to the current North Sydney limited public domain.

7. No comprehensive Stakeholder Engagement details are included and what issues were raised by the various stakeholders and how were they addressed.

8. There is no Public Domain Strategy included in this proposal just the focus on 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 fulfilled in this proposal for Victoria Cross station.

No compliance with the Secretary's Environmental Assessment Requirements (SEAR) Section 78A (8) of the EPA Act 1979 just mentions Public Domain Strategy in Appendix G.

However, the SEAR requires the following;

On (3) Design Excellence

- Provide Design Excellence Strategy, what has been provided is very inadequate.
- Provide the constitution of the Design Excellence Panel, this has not been provided.

On (4) Built Form and Urban Design

- Provide an urban design analysis which considers the proposed building forms, typologies, height, bulk and scale in the context of the immediate locality and the broader North Sydney CBD.

There is no urban design analysis provided with the EIS to justify the proposal's height, bulk and scale, the building massing appears this same since November 2017 brochure was published.

On (8) Heritage

- Provide Detailed Heritage Impact Statement.

The Heritage Impact Statement is not very detailed and it supports the OSD development, which is highly questionable considering the impact of this development on the heritage MLC building and on the significant green space corridor in Miller Street.

The Design Guidelines prepared by the NSW Government Architect are just as limited in their detail and scope. The EIS states that the Sydney Metro Design Excellence Evaluation Panel will provide independent evaluation. This is considered not possible if the panel will be chaired by the NSW Government Architect working directly for the Minister of Planning who will be approving this development.

As a professional with over 30 year's experience in architecture, urban design and planning and the local resident I strongly recommend that this proposal is significantly modified to achieve a much better public outcome for the community of North Sydney.

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