



address 200 Miller Street North Sydney NSW 2060
all correspondence General Manager North Sydney Council
PO Box 12 North Sydney NSW 2059
DX10587

telephone (02) 9936 8100

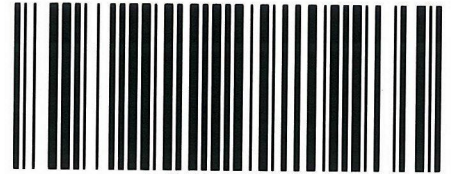
facsimile (02) 9936 8177

email council@northsydney.nsw.gov.au

internet www.northsydney.nsw.gov.au

ABN 32 353 260 317

Mr Russell Hand
Principal Planning Officer
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001



PCU075827

BY POST & EMAIL: russell.hand@planning.nsw.gov.au

GM(CIS)

Dear Mr Hand,

**RE: SYDNEY METRO VICTORIA CROSS OVER STATION
DEVELOPMENT (SSD8874)**

Thank you for the opportunity of commenting on the Response to Submissions for the Sydney Metro Victoria Cross over station development, State Significant Development Application (SSDA).

The response has been considered and it does not adequately address Council's concerns with the proposal, as detailed in the attached comments.

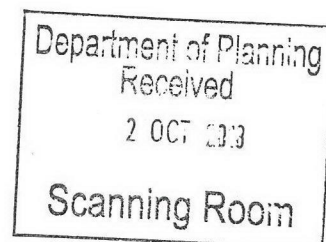
It is strongly felt that the proposed tower does not need to breach Council's setback requirements with regard to Miller Street. The tower above the podium at RL 118 can be setback (rather than brought forward) and the articulation of the tower occur within the 5m setback.

Council also considers that the opportunity will be lost to provide a significant station plaza, which integrates with the public domain of Miller Street and Berry Street by relying on Condition E101 of the CSSI approval. The "station box" needs to be revisited to allow for widening of the footpath at ground level on Berry Street where pedestrian numbers will be significantly increased with the opening of Victoria Cross.

Should you have any queries in relation to this application, please do not hesitate to contact me on 9936-8100.

Yours Sincerely


JOSEPH HILL
DIRECTOR CITY STRATEGY



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Victoria Cross Over Station Development Response to Submissions Report

Council's submissions to the DPE are summarised under the heading **Submission**. The Metro's response to Council's submission is reproduced under the heading **Response**. Council's further comments with regard to the Metro's response are under the heading **COMMENTS**.

The planning approval for the Metro project includes specific conditions requiring that detailed holistic plans be adopted to address the relationship of the Metro with surrounding areas and in particular with the public domain. These conditions of approval are condition E 92 – Interchange Access Plan and E 101 Station Design and Precinct Plan.

These conditions of approval contain a detailed list of requirements. It is considered that the current proposal undermines the requirements and the intent of these conditions. Council would welcome the opportunity to discuss these matters in greater detail at your earliest convenience.

5.11.1 Design options to promote a public plaza (Part 1)

Submission:

The submission from Council advocates for design excellence and design options that promote a public plaza of such size and characteristics that provide a much needed heart for the North Sydney CBD including:

- *consideration of no building above the station*
- *the alignment of the setback of any building form with the MLC building (to increase the opportunity for a public plaza)*
- *full or partial closure of Miller Street between Berry Street and Pacific Highway.*

Response:

Sydney Metro notes the comments from Council. The comments raised above are contrary to Council's endorsed and published vision of the Victoria Cross site. Sydney Metro has developed the concept proposal for the Victoria Cross OSD to align with NSLEP 2013, and the planning policies and controls which apply to this development site, as detailed in Chapter 6 (Assessment of compliance with strategic plans) and Chapter 7 (Assessment of compliance with statutory provisions) of the EIS. This includes the Sydney Metro Planning Study (supported by the North Sydney Capacity and Land Use Study) and the amendments to NSLEP 2013, as reflected in the North Sydney Centre Planning Proposal, both of which have recently been endorsed and/or adopted by Council and reflect Council's vision (at that time) for a significant commercial development above Victoria Cross Station

The design rationale for the OSD building envelope has been established with reference to the design parameters set by the design for Victoria Cross Station, as approved (CSSI Approval). In this regard, the base of the building envelope, including its alignment, allows for the appropriate integration of the station and OSD from an architectural, structural and operational perspective. The future design for the station (through the preparation of the SDPP and IAP) and the OSD (through the preparation of the detailed SSD Application) would be resolved through further design development. The building envelope is considered to establish appropriate outer limits for any future building, and will be subject to a design excellence process.

The design of the public domain and the opportunities to provide a significant station plaza which integrates with the public domain of Miller Street will be considered and refined as part of the preparation of the SDPP. In accordance with the Condition E101 of the CSSI Approval, the SDPP would present an integrated urban and place-making outcome for the integrated station development and would be developed in consideration of relevant Council policies. This plan would be developed in consultation with Council.

Regarding the issue raised by Council that the Victoria Cross site provides the last opportunity for a public plaza in the North Sydney Centre, Sydney Metro notes that Council is currently preparing a Masterplan for the Ward Street Precinct which includes a new public plaza (referred to as the 'North of Centre Square') incorporating pedestrian links to the north and south of the site, including to Denison Street and the metro station. On this basis, Sydney Metro considers that the Ward Street Precinct, given it includes Council-owned land and its planning is in the early masterplan stages, would provide a significant opportunity for new public open space and amenities for North Sydney CBD.

COMMENTS:

Council acknowledges that the Ward St Masterplan does include the provision of new public space, however the site of the new metro station has a level of natural amenity that is unmatched anywhere in the North Sydney CBD including Ward Street. The SSD design should recognise and respond to this once in a lifetime opportunity to provide much needed high amenity public space.

5.11.2 Compliance with the Miller Street setback

Submission:

That the DA be amended to comply absolutely with the Miller Street setback for the entirety of the façade of the building which faces Miller Street.

Response:

Sydney Metro contends that the Clause 4.6 Variation Request adequately addresses the provisions of Clause 6.4 of the NSLEP 2013. It specifically identifies that the proposal is non-compliant with Clause 6.4(2) as it breaches the 1.5-metre height limit and furthermore, it establishes that this breach occurs above RL 118, where the building envelope projects over the Miller Street setback area. As detailed in the Clause 4.6 Variation Request, the impact of the non-compliance would not compromise the objective of Clause 6.4, as the primary intention of the objective is compliance with the Miller Street setback and maintenance of the landscape setting. The proposal is considered to achieve this intent. Given the projection of the building envelope over the Miller Street setback occurs at RL 118, the proposal would still maintain a legible street wall in accordance with the objectives of Clause 6.4. There would be a consistent street wall from ground level to RL 118 that complies with the Miller Street setback.

The Victoria Cross Design Guidelines require that the final architecture and form of the integrated station development relate to the datum and composition of neighbouring buildings. Through detailed design, Sydney Metro is confident that the architectural resolution of the building can provide a contemporary solution that provides a contextually appropriate design response without necessarily adopting a podium and tower form. It is noted that the current form and character of development in Miller Street is varied and inconsistent, and there is no prevailing podium height or building form to the north or south of the site. Further, recently approved buildings do not demonstrate this form. As such, the proposed development's lack

of setback above the RL 118 and lack of a defined podium and tower is not considered to disrupt any prevailing character.

COMMENTS:

Council controls requires a podium with tower setback of 5m. The proposal does the reverse which is totally inconsistent with every recent development in the CBD and Council's character statement for the CBD as part of its DCP. The State Government should be a model applicant in this regard. The articulation of the tower could occur within the 5m setback behind the podium building line at RL 118 with a weighted average of 5m at least. Council could consider a variation of the entire setback less than the weighted average of 5m. The tower should not be closer to the street than the proposed podium but setback to be consistent with all of the other buildings in the CBD. This would also assist in reducing the building's dominance to Miller Street.

5.11.6 Deferral of SSD Application determination

Submission:

It is recommended that the planning proposal be gazetted prior to determination of this concept SSD Application.

Response:

The comments of Council are noted by Sydney Metro. Sydney Metro submits that the *North Sydney Centre Planning Proposal* has legal status and as such, is a matter for consideration by the consent authority under section 4.15 of the EP&A Act.

An assessment of the concept proposal against the proposed amendments to the NSLEP 2013 is provided in Section 7.5 of the EIS. This section also acknowledges that the *North Sydney Centre Planning Proposal* would need to be made (gazetted) prior to a determination of the concept SSD Application.

COMMENTS:

Gazettal still unknown. Council notes that there are a number of projects relying on the Planning Proposal gazettal that are likely to be constructed prior to the opening of the Metro.

5.11.8 Management of construction traffic

Submission:

The ongoing construction traffic should be contained to Miller Street and northern part of Denison Street so that the Denison Street plaza can be established for the completion of 1 Denison Street and entry to the new station in Denison Street when it becomes operational. It is also important to ensure that vehicular access can be provided through the carpark of the OSD to the MLC site to provide an alternate access for parking and loading that would result in a safer and better pedestrian plaza that forms the entry to the station without the conflict of cars and trucks.

Response:

The concept SSD Application does not seek approval for any construction. Final arrangements for the management of construction traffic would be confirmed at the detailed SSD Application stage in consultation with Council and other relevant stakeholders during preparation of the

Construction Traffic Management Framework (CTMF) and the Construction Traffic Management Plan (CTMP).

Provision has been made for a future a breakthrough within the car park of the Victoria Cross integrated station development (soft walls). The current level of station design has provision for a possible future connection to the MLC building. Any future breakthrough and link would be delivered by the adjoining owner. Until this link is realised, building owners and tenants will continue to be responsible for the management of vehicular traffic into and out of their loading dock and car parking facilities

COMMENTS:

Noted, Council raised the concerns about traffic impacting on Denison Street so that the proponent was aware of the situation. It is important when the Metro becomes operational that the Denison Street Plaza is established for a better public domain outcome for the Metro and reduce conflict between construction traffic and pedestrians. The future breakthrough within the carpark to the MLC is important as a method of removing cars from the pedestrian route to resolve traffic conflicts and this needs to be provided and retained in the SSD application.

5.11.3 Public domain strategy and removal of MLC café

Submission:

That Transport for NSW make approaches to the owners of the existing café between the Metro site and the MLC building with a view to including this site in its overall vision for a more pedestrian focused Miller Street environment.

Response:

Whilst the indicative public domain treatments are considered in the concept SSD Application as part of the conceptual vision for the site, it is emphasised that the design and construction of the entire public domain area is to be resolved under the terms of the CSSI Approval and does not form part of this application.

The public domain strategy will be addressed through the preparation of the SDPP (E101) and IAP (E92) by the proponent. Council will be consulted during the preparation of these plans under the specific terms of each condition as detailed in Section 2.2 of this Submissions Report.

As acknowledged in the Council submission, the removal of the MLC café is outside the scope of the project. However, opportunities to ensure a high-amenity pedestrian outcome through the connectivity of the linear open space along Miller Street can be explored in consultation with Council during the development of the SDPP.

COMMENTS:

Noted. This is a matter that Council will continue to pursue for a pedestrian focussed Miller Street public domain.

5.11.1 Design options to promote a public plaza (Part 2)

Submission:

That an appropriately scaled forecourt be provided at the ground plane on the corner of Berry and Miller Streets in recognition of the pedestrian prominence of this corner, its potential visual relationship to the Ward Street precinct and its solar amenity.

Response:

The design rationale for the OSD building envelope has been established with reference to the design parameters set by the design for Victoria Cross Station, as approved (CSSI Approval). In this regard, the base of the building envelope, including its alignment, allows for the appropriate integration of the station and OSD from an architectural, structural and operational perspective. The future design for the station (through the preparation of the SDPP and IAP) and the OSD (through the preparation of the detailed SSD Application) would be resolved through further design development. The building envelope is considered to establish appropriate outer limits for any future building, and will be subject to a design excellence process.

The design of the public domain and the opportunities to provide a significant station plaza which integrates with the public domain of Miller Street will be considered and refined as part of the preparation of the SDPP. In accordance with the Condition E101 of the CSSI Approval, the SDPP would present an integrated urban and place-making outcome for the integrated station development and would be developed in consideration of relevant Council policies. This plan would be developed in consultation with Council.

Regarding the issue raised by Council that the Victoria Cross site provides the last opportunity for a public plaza in the North Sydney Centre, Sydney Metro notes that Council is currently preparing a Masterplan for the Ward Street Precinct which includes a new public plaza (referred to as the 'North of Centre Square') incorporating pedestrian links to the north and south of the site, including to Denison Street and the metro station. On this basis, Sydney Metro considers that the Ward Street Precinct, given it includes Council-owned land and its planning is in the early masterplan stages, would provide a significant opportunity for new public open space and amenities for North Sydney CBD.

COMMENTS:

The relationship of the ground floor of the tower with the public footpath at Miller and Berry Streets raises a number of concerns which should be resolved prior to the design proceeding.

The relationship of the northern corner of the building with Berry Street has been misrepresented in the plans with the existing delivery bays (serving multiple buildings) shown as footpath. The actual available footpath along Berry Street would actually be less than 2m. This is wholly inadequate for such a high traffic pedestrian area.

The relationship with Berry Street is further compromised by the proposed Western Harbour Tunnel Beaches Link. This proposed road way plans for an increase vehicle traffic on Berry Street which further disrupts the already congested delivery bays along Berry St. This serves to prevent any future widening of the footpath along Berry Street.

The concept stage of the Victoria Cross Station development indicated an open forecourt on the corner of Berry St and Miller St as shown in Figure 01 below. Subsequent design drawings show this important space as 'glassed-in' and no longer publicly accessible (Figure 02). Pedestrian modelling undertaken under the CBD Transport masterplan indicates a volume increase of 300% at this particular junction. The removal of this publicly accessible space will be detrimental to the public domain outcome and does not meet council strategic guidelines for the future amenity for North Sydney CBD.

Figure 02 highlights the areas of space that require review. There is scope for these spaces to be re-designed to meet the original design concept objectives. We request that this space be reviewed to meet future pedestrian growth figures as well as provide an outstanding urban design outcome for the most prominent sun-lit corner of the CBD.



Figure 01: Concept Victoria Cross OSD

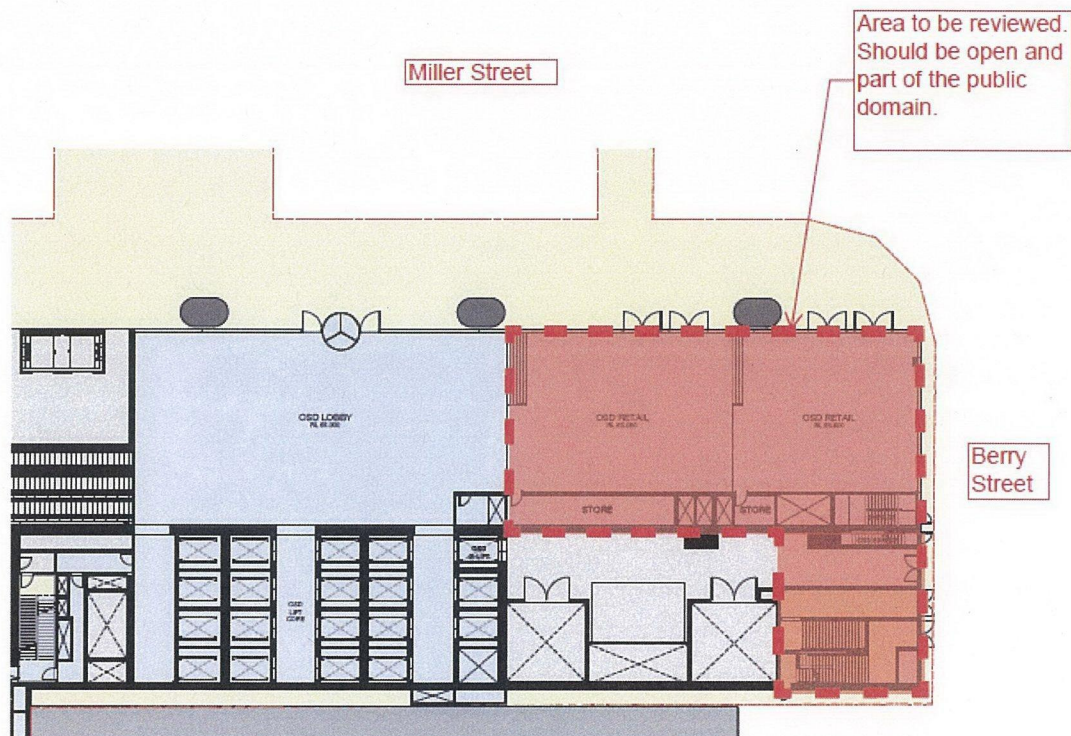


Figure 02: Open space now removed and glassed-in tenancies put in place.

5.11.4 Berry / Miller Street forecourt and building setback

Submission:

That the proposed development provides a setback to Berry Street which is more consistent with the adjoining setback of 65 Berry Street in recognition of the emerging character and potential connectivity to the Ward Street precinct.

Response:

The functional and structural requirements of the station and consequential ground planning, means that the equivalent setback to 65 Berry Street cannot be achieved. The station box aligns with the Berry Street site boundary and is necessary to accommodate the structural and servicing requirements for the station. Furthermore, this alignment responds to the location of the northern adit design (i.e. which provides the underground connection to the station). Sydney Metro notes that the built form for the station has been approved under the CSSI Approval. Design will be resolved further through the preparation of the SDPP required to be prepared under Condition E101 of the CSSI Approval. Therefore, this matter is outside the scope of this concept SSD Application.

It is noted that a setback of five metres to the northern boundary is proposed for the OSD building envelope and is consistent with the prescribed setback in the NSDCP 2013.

COMMENTS:

The 5m setback of the tower from the northern boundary should also be at ground level to widen the Berry Street footpath if at all possible. This issue has been addressed previously above with regard to the corner and Berry Street.

5.11.5 Miller Street façade alignment**Submission:**

That Transport for NSW explore opportunities and the feasibility of aligning the proposed development at the ground plane, with that of the existing MLC building.

Response:

Sydney Metro notes the comments from Council. In respect to the impact of the building alignment on the MLC building, as stated above, the ground plane arrangements, the structural grid and the podium form of the OSD are fundamentally established as part of the station design.

The current reference design for the station partially aligns with the MLC building and also the predominant setback in Miller Street, resulting in a staggered western building alignment. The OSD building envelope responds to this design and also complies with the minimum six-metre setback required for Miller Street in NSLEP 2013, as detailed in Chapter 7 of the EIS, although provision has been made for an articulation zone. The low-rise form along Miller Street at the south end of the site, which forms part of the station development under the CSSI Approval, serves as an intermediary form and provides a transition between the MLC building and the OSD. This is consistent with the minimum setback required in NSLEP 2013 and Council's *Sydney Metro Planning Study* (specifically for a development option incorporating a northern tower). This is, considered to be appropriate and in accordance with Council's vision for the area.

COMMENTS:

The proposal allows for a substantial amount of office space over the station. Council contends that for the ground plane at least that setbacks are maximised to provide for a high quality public domain to provide for the significant increase in workers to the CBD. This would include the opening of the retail spaces at the corner and the widening of Berry Street footpath. The cantilevering of the "articulation zone" over the Miller Street setback is not supported due to the building's dominance above the public domain.

5.11.1 Design options to promote a public plaza (Issue 3)

Submission:

The submission from Council advises that it is in the final stage of preparing the North Sydney CBD Transport Masterplan, which seeks to maximise the benefits of the metro and ensure that walking, cycling and public transport mode share is maximised, the mode shift benefits of metro are capitalised upon, and that this contributes to a high amenity, attractive and inviting precinct post metro. The current through traffic function of both Miller and Berry Streets is not aligned with this objective, especially given the location of new plaza/ pedestrian space for the site and anticipated pedestrian traffic at this location in the peak hour.

Response:

Sydney Metro notes that the partial closure of Miller Street between Berry Street and the Pacific Highway is a matter for Council to pursue with the relevant road authorities. The IAP required to be prepared by Condition E92 of the CSSI Approval would be relevantly designed to respond to the surrounding road network and would be developed in consultation with the Council and the transport agencies.

COMMENTS:

Noted, Council will be pursuing the closures with the relevant authorities. These measures would improve the amenity of the public domain.

Figure 5.3 in the *Response to Submissions Report* is inaccurate and does not reflect the correct kerb to building setback. This base diagram has been used throughout the various Sydney Metro reports and continually misleads as to the true setback on Berry St. The parking bays do not end at 65 Berry St rather they extend to approximately 14m from edge of Miller St creating a reduced setback and reduced footpath width that will not be adequate for the expected numbers of pedestrians along this strip of Berry St post-Metro. This pinch-point along one of North Sydney's busiest streets is unacceptable. See diagram below for further clarification.

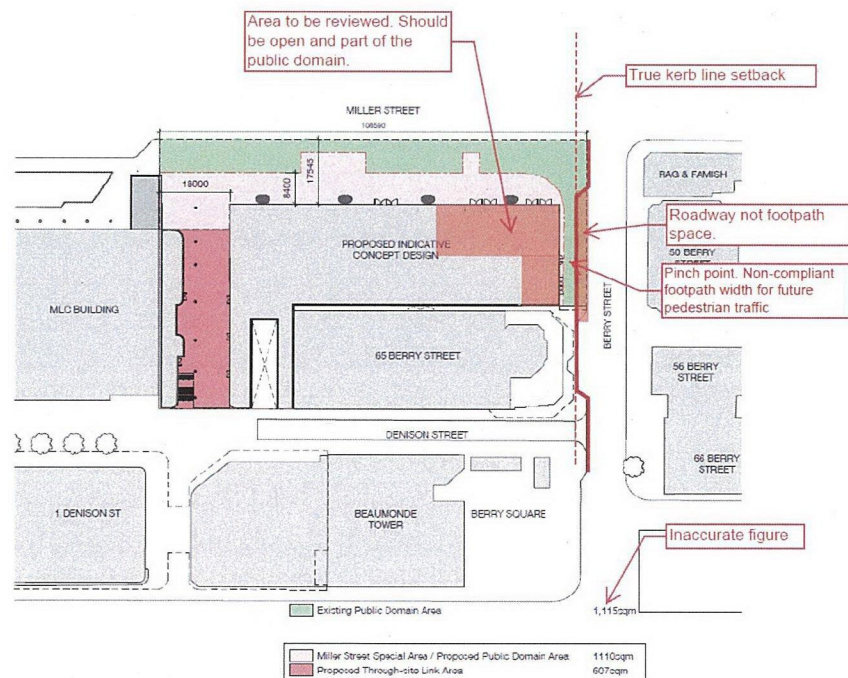


Figure 5.3 — Indicative station design – public domain and open space

5.11.10 Integration of Metro with North Sydney Station

Submission:

Council contends that the proposal represents a lost opportunity to integrate the proposed metro station with the existing North Sydney station. The submission advises that a link between Victoria Cross Station and Greenwood Plaza (North Sydney Station) would provide weather protection boundary of the current development application, it highlights a significant flaw in the vision for the creation of a new high amenity public domain corridor for North Sydney. If nothing else, it reinforces the existing undesirable pinch point which will only experience growth in pedestrian traffic under metro. This small portion of land remaining to function in its current state under the new metro vision, is a significant lost place-making opportunity for North Sydney.

Response:

Whilst the indicative public domain treatments are considered in the concept SSD Application as part of the conceptual vision for the site, it is emphasised that the design and construction of the entire public domain area is to be resolved under the terms of the CSSI Approval and does not form part of this application.

The public domain strategy will be addressed through the preparation of the SDPP (E101) and IAP (E92) by the proponent. Council will be consulted during the preparation of these plans under the specific terms of each condition.

COMMENTS:

Noted, Council may need to wait until future opportunities to integrate the stations however the preference is for the state to lead any such initiative.

5.11.11 Lack of open space, public domain or cultural facilities

Submission:

Council recommends that the ongoing construction traffic should be contained to Miller Street and the northern part of Denison Street so that the Denison Street plaza can be established for the completion of 1 Denison Street and entry to the new station in Denison Street when it becomes operational.

Response:

The concept SSD Application does not seek approval for any construction. Final arrangements for the management of construction traffic would be confirmed at the detailed SSD Application stage in consultation with Council and other relevant stakeholders during preparation of the Construction Traffic Management Framework (CTMF) and the Construction Traffic Management Plan (CTMP).

COMMENTS:

Council raised the concerns about traffic impacting on Denison Street so that the proponent was aware of the situation. It is important when the Metro becomes operational that the Denison Street Plaza is established for a better public domain outcome for the Metro and reduce conflict between construction traffic and pedestrians.

5.11.11 Lack of open space, public domain or cultural facilities

Submission:

Council contends that the proposal lacks open space, public domain or cultural facilities. The previous Tower Square was a successful place where people congregated for lunch and socialising. Council's submission contends that the proposal misses an opportunity to create quality public domain or community facilities at street level to activate this space.

In addition, the submission contends that North Sydney CBD lacks a town hall, performance spaces, meeting spaces, cinema, exhibition spaces and the like that could be incorporated into a significant development such as that being proposed by the NSW Government.

Response:

Sydney Metro considers that the proposed commercial uses respond to Council's strategic vision for the site and to the broader vision to improve North Sydney CBD's role as a primary office market in an internationally competitive Sydney. As the concept SSD Application seeks approval for commercial premises on the site, the final mix and configuration of land uses (i.e. retail, office and business premises) will be a matter for the future detailed SSD Application.

It is noted that the commercial use of the OSD is consistent with the Council's Sydney Metro Planning Study, which identifies the site as suitable for a large iconic commercial building to meet premium or A-grade market demand and which will reinforce the commercial character of the North Sydney Centre.

Sydney Metro acknowledges Council's desire for the transformation of the Victoria Cross into an active and vibrant urban place. Sydney Metro will work collaboratively with Council during the for public domain and public amenity on the site. This work will be delivered under the terms of the CSSI Approval and is outside the scope of this application.

COMMENTS:

The proponent of the SSD application needs to be aware of the need to create quality public domain or community facilities at street level to activate this space and that North Sydney CBD lacks a town hall, performance spaces, meeting spaces, cinema, exhibition spaces and the like that could be incorporated in the SSD.

Tower Square had good solar amenity and was an open, publicly accessible, space to gather that was protected under the North Sydney LEP. The Victoria Cross Station will need to provide the equivalent and build on this to reflect the increase in patron numbers. All future tenancies and spaces which receive good solar amenity will need to be reviewed and protected for public use to ensure the OSD achieves the amenity that was LEP protected previously for Tower Square.

5.11.12 Acquisition and integration with 65 Berry Street

Submission:

Council recommends that the proposal should include the acquisition and integration of 65 Berry Street into the metro station and OSD. Whilst the land acquired serves the purpose of the provision of a metro station, Council contends that the acquisition of the adjoining site at 65 Berry Street would represent a vastly superior basis for an OSD to deliver wider benefits befitting North Sydney CBD.

Response:

The Victoria Cross site was acquired by TfNSW specifically for the purpose of constructing the Sydney Metro. The acquisition of additional land at 65 Berry Street is outside the scope of the acquisition powers afforded to TfNSW under the *Transport Administration Act 1988* and would be surplus to the transport infrastructure requirements of Sydney Metro. The OSD site boundaries have been determined as part of the CSSI Application (and subsequent approval) and the proposed OSD building envelope relates to the airspace above the already acquired development site.

COMMENTS:

Noted. Council still contends that the acquisition of the adjoining site at 65 Berry Street would represent a vastly superior basis for an OSD to deliver wider benefits befitting North Sydney CBD. Without the compulsory acquisition of 65 Berry St the 5m setback of the tower from the podium (as per LEP/DCP requirements) is unachievable thus resulting in a poor building envelope outcome for the tower that is not compliant with North Sydney LEP setback requirements.

5.11.13 Width of pedestrian access**Submission:**

Council contends that the width of access into and from the metro station is not sufficient to accommodate pedestrian movement between Miller Street and Denison Street. The station will accommodate approximately 15,000 pedestrian movements in the morning peak. Consideration should be given to the functional width of these access points to provide for the public circulation requirements of the metro station and to maximise the place-making benefits at the site.

Response:

The scope of this concept SSD Application is limited to the OSD (i.e. the OSD structure above the station and the OSD spaces provisioned for within the approved station box, above and below ground level). In this regard, this SSD Application does not extend to works associated with the Victoria Cross Station, the ground plane arrangements and pedestrian connections.

The resolution of the ground plane and pedestrian circulation will be addressed through the preparation of the SDPP (Condition E101) required to be prepared under the terms of the CSSI Approval. Sydney Metro notes that pedestrian forecasts and analysis indicate that there is adequate width to accommodate pedestrian movements to access points and between Miller Street and Denison Street. Section 6.4.2 (Footpath Capacity) of Appendix P (Transport, Traffic and Parking Assessment Report) of the EIS addressed the footpath capacity near the station entry points. It noted that the forecast increase in pedestrian demand on this footpath would be largely attributed to the introduction of Victoria Cross Station and the planned development of the precinct and the intensification of surrounding development, rather than the OSD.

COMMENTS:

This issue has been addressed previously above with regard to the corner and Berry Street. The comment *'It noted that the forecast increase in pedestrian demand on this footpath would be largely attributed to the introduction of Victoria Cross Station and the planned development of the precinct and the intensification of surrounding development, rather than the OSD'* has no relevance to the submission concerns of Council. The OSD is the only opportunity to alleviate the concerns regarding the pinch-point that will be created along Berry St by the OSD

being built right to the boundary. The OSD ground-plane design needs to be re-designed as per the diagram shown below:

5.11.14 Inadequate street level view assessment

Submission:

Council contends that the application does not include critical street-level views of the proposed OSD from Denison Street and the eastern side of Berry Street. Council contends that these views are important to understand how the proposal will fit into the urban context of North Sydney.

Response:

While the View Impact Study in Appendix Y of the EIS does not use Denison Street or Berry Street as specific vantage points, the 14 key vantage points chosen are considered to provide a comprehensive depiction of the visual impacts of the development from the surrounding area. The Visual Impact Assessment Report at Appendix AA of the EIS concludes that the development would be consistent with its CBD context and compatible with surrounding development.

Sydney Metro has undertaken a further view study of the impact of the integrated station development when viewed in the context of Denison Street at the intersection with Berry Street (refer to Appendix I). A series of sketches have been prepared showing the previous (pre-demolition) view and the impact of the building envelope as exhibited (noting the amended building envelope has no impact on this view). Refer to the Streetscape and Visual Impact Study – Denison Street at Appendix I.

COMMENTS:

Noted. Council's comments on the lack of setback of the tower to Miller Street is still the major concern. Adequate streetscape sketches have still not been provided for Berry St indicating a resistance by Sydney Metro to disclose the visual bulk and amenity loss by the podium edge facing Berry St. Council urgently requests that this information as the existing setback along the southern side of Berry St is one of great significance and opportunity for the Sydney Metro project.

5.11.15 Integration of bus services

Submission:

Council has raised concern that the integration of bus services has not been fully considered and that B Line bus services to and from the Northern beaches presents an opportunity of linking with this new public transport service. Connecting to Sydney Metro will significantly reduce bus congestion for those travelling across the Sydney Harbour Bridge. This interchange potential should be better considered.

Response:

The proposal will not preclude possible future B-line (Northern Beaches) related bus service changes in North Sydney. The future integration of the development (as relevant) will be considered during the preparation of the IAP in accordance with Condition E92 of the CSSI Approval.

COMMENTS: The preparation of the IAP should include reference to the adopted *North Sydney CBD Transport Masterplan 2018*