

Submission on Stage 1 Concept Modification Application (SSD-8874-Mod-1)

Sydney Metro has already, at several earlier information sessions, been given detailed comments opposing the over development proposed over the Metro Station at Victoria Cross. I continue to oppose this current proposal from Lend Lease and Sydney Metro, which unfortunately differs in no significant way from the earlier proposal. It is puzzling that with the numerous earlier community information/consultation sessions by the Sydney Metro and huge community concerns about the inadequacy of the OSD design concept proposal nothing has been changed or improved.

The brutal building form remains brutal in spite of the EIS claiming *that the brutal building form has been reduced by a minute tokenistic building setbacks.*

This proposal for the OSD remains a significant 'missed opportunity' to create a 'civic heart' for North Sydney, revitalising what has become a working CBD drab and empty on the weekends and after working hours where people and civic life have been absent for decades.

The OSD on public land should maximise openness and civic functions at street level. The project should offer community and civic functions rather than retail that will close after hours and on weekends as what currently happens with other retail functions in the CBD.

The OSD proposal does not create a generous egress and exit for the 15,000 commuters travelling into and out of this station each day and the proposed workforce of 4,900. 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 2 m wide footpath in Miller Street and wait for the traffic lights to change.

This OSD is concerned only with the maximising of the commercial return to the State Government and a massive lost opportunity for the North Sydney community.

The following are more specific comments on the EIS:

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"*.
2. **This is a bizarre and untrue statement.** The proposal does NOT create any "large scale civic spaces". 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.

3. 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.”*
4. **This is untrue.** The project does not address the integration with the MLC building next door which has pedestrian spaces along Miller Street on a much lower level 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.
5. The documents state *“The OSD project is part of fully integrated transport system”*
6. **This is untrue.** The Victoria Cross Sydney Metro station does not integrate with the heavy rail line nor the existing rail station in North Sydney. It happens to independently arrive into the same CBD. There is also no discussion in the EIS on how it will integrate with the buses in the CBD area, which are a major transport mode for commuters in the surrounding suburbs not serviced by rail lines.
7. The documents state in the OSD they *“ Design(ed) a podium which offers commercial and retail opportunities via thriving civic place”*
8. **This is untrue.** Where is the thriving civic place proposed? Commercial and retail spaces in a podium are NOT ‘civic spaces’. The narrow building setback in Miller Street definitely does not qualify as such, nor does the narrow laneway to Denison Street.
9. 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.”*
10. **This is very 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 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 and so it should not be replicated in North Sydney. The 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.*

11. The documents state *"The OSD will provide a high-quality built form which sits harmoniously within the context of significant built heritage"*
12. **This statement is perversely untrue.** How can a 168m high tower 'sit harmoniously' within the context of two storey hotel, the adjacent iconic MLC Centre, the post office and court house, and the low-rise school buildings in the proximity?
13. The documents state the OSD will *"provide a built form that minimises overshadowing impacts to surrounding public spaces"*.
14. **This is demonstrably untrue.** It is a proven and undeniable fact that the 42-storey new tower will definitely overshadow further Miller Street and other existing public spaces in the CBD. The local community developed the shadow diagram modelling of the CBD and has it ready to show this to you to demonstrate the composite shadow impacts of this development and all the adjoining major developments on the existing scarce public open space in North Sydney.
15. The documents state that the *"Consultation informed the public domain"*.
16. **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. There never has been the slightest glimmer of an intention to depart from the fundamentals of the original proposal. It appears the only interest the State Government seeks from this OSD is to maximise the desired uplift of commercial floor space and the financial return from this development.
17. The documents state that *"The EIS states that it provides comprehensive justification for exceeding building height control. "*
18. **This is completely untrue.** There is no justification offered as to why the development should be granted *additional* 1,600m² of floor space nor why it should encroach on the current 5m street setback requirement in Berry Street. It justifies the additional height and floor space on the achievement of more footprint and greater commercial floor plates and obviously greater financial return.
19. The documents offer the community *"the Hub"* - a 200m² 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.
20. **This is apathetic and offensive token gesture** and very much not what the community was expecting from this significant State Government project on the

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.

21. **In addition**, 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.

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

23. **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 CBD. 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 week day. Another opportunity to create something relevant and unique is completely missed.

24. More specific comments on the Public Domain Concept Plan.

25. This plan offers a widened footpath area fronting Miller Street with only about 2m pedestrian paved area along the kerb of Miller Street which is completely inadequate for the current and future pedestrian traffic. The building setback is cluttered with raised grassed area and series of ramps and fenced outdoor platforms in front of the retail shops strictly privatising this very scarce and needed public space.

26. The suggested approach to public domain proposal for Miller Street frontage is considered unacceptable and bad urban design outcome for this hub of pedestrian activities in the CBD. The design should be maximising the circulation space and providing a flexible, level and generous plaza with shade trees and series of seats under trees fully integrating it with the Council’s proposed widening of the existing pedestrian area in Miller Street.

27. 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.

28. **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.

In summary I would like to stress that this proposal for the OSD on State Government land is no different to any other commercial office buildings currently being constructed in the North Sydney CBD. It is an oversized, bland commercial building which will definitely not contribute to a notion of well-designed, healthy, responsive, integrated, equitable and resilient built environment as specified in the current Better Placed design policy for the built environment of NSW published by the NSW Government Architect and endorsed by the NSW Minister of Planning. This document states on page 21 *What we don't want: Poor fit and not responding to context, Poor for Community, Poor for People, Poor functionality, Poor look and feel.*

Unfortunately, this is what North Sydney community is going to get.

Yours sincerely

Margaret Petrykowski FRAIA
Architect, Planner, Urban Designer
Local Resident