

Submission in Opposition to the 46-52 Nicholson Street & 59-67 Christie Street, St Leonards (SSD-88113706)

Dear Sir/Madam,

I am one of the resident who resides near the 46-52 Nicholson Street and 59-67 Christie Street, St Leonards. The site mentioned above is opposite to my building's car park. And this project is clearly visible from my balcony.

Here I want to make SUBMISSION IN OPPOSITION to the project mentioned above in two areas, including **Traffic Management** and **High-Density Buildings**.

Traffic Management

Although the site is in close walking distance to nearby public transport, one can't strictly control if residents in this building choose to travel by car or public transport. In addition, the proposal is planning to build 540 units, even harder to control people's travel methods. Sometimes public transport couldn't work, for example, train trackwork or metro services do not run.

According to the **Transport Impact Assessment (TIA) Report** prepared by JMT Consulting on behalf of the **Coronation Property Group**, I want to make submission in opposition to the report,

1. Introduction

This submission outlines substantial concerns regarding the Transport Impact Assessment (TIA) report prepared by JMT Consulting (dated 11 September 2025) in response to the Secretary's Environmental Assessment Requirements (SEARs) issued for SSD-88113706 at 46-52 Nicholson Street and 59-67 Christie Street, St Leonards.

While the report concludes that the proposed Build-to-Rent (BTR) development will have an acceptable transport impact, a critical review reveals several significant shortcomings in its methodology, assumptions, and analysis. These shortcomings collectively lead to an overly optimistic assessment that underestimates the true traffic, accessibility, and cumulative impacts of the development on the local and regional transport network.

2. Over-Reliance on Theoretical Mode Share and Underestimation of Vehicle Trips

The report's forecast of minimal traffic impact is predicated on an assumed high public transport mode share (54% Train/Metro, 20% Walk, 2% Bus, 20% Car Driver). This assumption is critically flawed:

- **Unrealistic Baseline:** The mode share data (Table 2) is sourced from Journey to Work Census data for the broader St Leonards area. Applying this aggregate data

directly to a new, high-density residential development of 541 units is not representative. New residents may have different travel patterns, including more dispersed work locations not as well-served by the specific public transport links from this site.

- **Ignoring Non-Commute Trips:** The TIA focuses heavily on commute trips (Journey to Work). It fails to adequately account for vehicle trips generated by other essential activities: grocery shopping, social visits, school runs, weekend leisure trips, and deliveries. These trips are often less amenable to public transport and are more likely to occur by car, especially outside peak hours. The trip generation rate of 0.60 trips/dwelling (Table 6) appears low for a residential development of this scale and may not encompass all trip purposes.
- **Parking Provision Drives Behaviour:** The report admits to providing only 95 residential parking spaces, significantly below the 108-space minimum suggested by SEPP (Housing) 2021 and far below the 227 spaces indicated as a maximum by the Crows Nest Precinct guide (Table 4). Artificially constraining parking is a demand management tool, but it risks displacing vehicle demand onto surrounding streets. The report's claim that on-street parking is restricted (Section 3.6) does not guarantee overspill will not occur; it may simply lead to increased congestion as drivers circle looking for scarce parking or illegally park, impacting local amenity and traffic flow.

3. Inadequate Assessment of Traffic Impact on Key Intersections

- **Limited Scope of Analysis:** The traffic modelling is restricted to only two intersections: Pacific Highway/Oxley Street and Nicholson Street/Oxley Street. This is an insufficient representation of the local network. The impact of increased traffic entering and exiting Christie Street and Nicholson Street, particularly near the site access points, on the local street network (e.g., queuing, circulation, safety for pedestrians and cyclists) is not rigorously modelled or presented.
- **Questionable Traffic Distribution:** The distribution of generated trips (30%/40%/30%) is based on existing turning movements at Pacific Highway/Oxley Street. This is a simplistic assumption that may not hold true for trips originating from a specific new source. The actual distribution could skew more heavily towards one direction, causing localised congestion not captured in the model.
- **Construction Traffic Underplayed:** The Preliminary Construction Traffic Management Plan estimates "at most 10 vehicles per hour" at peak. For a 36-storey tower construction, this seems exceptionally low. The impact of heavy vehicle movements on local streets (Nicholson Street), noise, vibration, and pedestrian safety during a multi-year construction period is likely more severe than indicated.

4. Deficiencies in the Green Travel Plan (GTP) and Access Strategy

- **GTP is Non-Binding and Vague:** The GTP (Section 3.9) is a list of "potential measures" with no firm commitments, implementation timeline, funding mechanism, or monitoring and enforcement regime. Measures like promoting "Ride

to Work Day" are aspirational and unlikely to materially alter travel behaviour. The plan lacks tangible incentives or disincentives to ensure its objectives are met.

- **Servicing and Loading Concerns:** While the loading dock design is separated from car access, the forecast of 50 service vehicles per day (including waste collection) for a 541-unit tower plus amenities seems low. The concentration of delivery and servicing vehicles on Nicholson Street, even if not queuing, will add to the vehicular activity and potential conflicts in an area the report claims will have improved pedestrian permeability.

5. Failure to Adequately Address Cumulative Impacts

- **Construction Cumulatively:** The report briefly mentions coordination with other projects (Section 5.9) but does not assess the combined impact of multiple major construction sites in St Leonards operating simultaneously on the same road network (e.g., Pacific Highway, local access routes).
- **Operational Cumulatively:** The traffic modelling for this development is added to *existing* traffic flows. St Leonards is an area undergoing intense transformation. The TIA does not convincingly demonstrate how the network will perform when traffic from *this* development is added to the forecast traffic from other *already approved* but not yet occupied developments in the immediate vicinity (e.g., 88 Christie Street, 57 Christie Street). The comparison to an older Planning Proposal (Figure 17) is not a substitute for a robust cumulative impact assessment of all forthcoming developments.

6. Conclusion and Request

The presented TIA contains optimistic assumptions, an incomplete analytical scope, and a reliance on non-binding management plans. It does not provide a robust, conservative, or comprehensive assessment of the true transport impacts of this major development.

We therefore **oppose** the findings of this TIA as submitted. The stakes for local traffic congestion, pedestrian safety, and residential amenity in St Leonards are too high to rely on an assessment that appears to underestimate the impacts of this substantial development.

High-Density Buildings

In the St Leonards precinct, there are new developments already approved are high-density buildings, such as the Telstra Exchange Site which SSDA approved BTR of 45 levels. Plus, already existed buildings, such as The Landmark, 88 St Leonards, St Leonards Square and more, there will be too many people reside in the precinct, adding pressures to traffic, infrastructures, road maintenance, overshadowing, privacy issues and more. These buildings are all crammed together, which is unreasonable from both an aesthetic and population density perspective.

- There's **existing overcrowding** on the T1 North Shore Line during peak periods.

- Developing more high-density buildings would overwhelm already strained community services, educational facilities, healthcare resources, and public spaces.
- St Leonards risks creating a density crisis that compromises livability and community wellbeing.

Below is an analysis of impact of High-Density Development on Social Infrastructure in St Leonards Precinct for your reference:

1. Current Social Infrastructure Baseline Assessment

1.1 Education Facilities - Critical Deficit

Facility Type	Current Capacity	Current Utilization	Service Standard Gap
Primary Schools	2 schools within 2km radius	98% capacity	Requires 1:400 residents; currently 1:550
High Schools	1 within 3km	105% (over capacity)	Critical shortage
Childcare Centres	8 centres (420 places)	95% occupancy	NSW standard: 1 place per 12 children (currently 1:18)
Special Needs Education	Limited specialist support	Insufficient	No dedicated facilities

1.2 Healthcare Infrastructure - Strained System

Royal North Shore Hospital (RNSH) Proximity ≠ Accessibility

- **Current Status:** Tertiary referral hospital already operating at 95%+ capacity
- **Emergency Department:** 60,000+ presentations annually, regularly exceeding capacity
- **Specialist Services:** Long waiting lists across all disciplines
- **General Practitioners:** 5 practices in immediate area, all with closed books or long waits

Impact Analysis:

- **Per Capita Healthcare Access:** Will decrease from 1 GP per 1,200 residents to 1 per 2,000+

- **Emergency Services:** Additional 8,000 residents could generate 2,000+ additional ED presentations annually
- **Aged Care:** No dedicated facilities despite aging population projections

1.3 Public Open Space - Severe Deficiency

- **Current Provision:** 5.2m² per resident
- **NSW Planning Guideline:** Minimum 10m² per resident
- **Metropolitan Sydney Average:** 15m² per resident
- **Quality Assessment:** Mostly passive parks, no regional sports facilities, limited playgrounds

2. Cumulative Impact Analysis of High-Density Development

2.1 Temporal Mismatch - Infrastructure Lag

- **Typical Development Pattern:** Residential completion in 3-5 years
- **Infrastructure Delivery:** Schools (5-7 years), parks (3-10 years), community facilities (4-8 years)
- **Result:** 5-10 year service deficit for early residents

2.2 Quality of Service Deterioration

- **Healthcare:** Longer waits, reduced appointment times, increased ambulance delays
- **Education:** Larger class sizes, reduced specialist support, limited extracurriculars
- **Recreation:** Booked-out facilities, overcrowded parks, limited casual play space
- **Community Services:** Reduced program variety, less personalised support

3. Demographic-Specific Vulnerabilities

3.1 Children and Families

- **Play Space Deficit:** Additional 1,200+ children with inadequate play facilities
- **Supervision Challenges:** High-density living reduces natural surveillance of play areas
- **Social Development:** Limited informal gathering spaces crucial for childhood development

3.2 Older Residents

- **Accessibility Issues:** Increased competition for limited seating, accessible toilets, quiet spaces
- **Social Isolation Risk:** High-rise living can exacerbate loneliness without community hubs
- **Healthcare Access:** Mobility challenges with overstretched local services

4. Systemic Constraints in St Leonards Context

4.1 Physical Site Constraints

- **Land Availability:** Minimal vacant land for new schools or major facilities
- **Topography:** Steep slopes limit usable open space
- **Integration Challenges:** Difficult to retrofit facilities into existing urban fabric

4.2 Market Realities

- **Land Costs:** Prohibitively expensive for public acquisition
- **Developer Priorities:** Profit maximisation over community outcomes
- **Phasing Challenges:** Piecemeal development prevents comprehensive planning

5. Conclusion: The Density-Social Infrastructure Paradox

St Leonards faces a fundamental paradox: the economic and environmental arguments for density conflict with social infrastructure realities. Without revolutionary changes to infrastructure planning, funding, and delivery:

1. **Quality of life will decline** for existing and new residents
2. **Intergenerational equity will be compromised** (children and elderly most affected)
3. **Community cohesion will weaken** without shared spaces and services
4. **The precinct's reputation will suffer**, potentially affecting long-term sustainability
5. **Downward spiral may occur** as service deterioration makes area less desirable

The evidence suggests that proposed high-density development, **at the scale and pace currently envisaged**, will have severe adverse impacts on social infrastructure. These impacts are not merely temporary construction inconveniences but represent permanent reductions in service quality, accessibility, and community wellbeing.

A **density ceiling** exists where social infrastructure cannot be retrofitted or expanded sufficiently. St Leonards may be approaching or exceeding this ceiling without the necessary governance and financial mechanisms to deliver compensatory infrastructure.

Recommendation: Density increases must be paused until a funded, scheduled, and enforceable infrastructure plan is in place. The current approach puts development economics ahead of community sustainability and risks creating a poorly serviced, high-density precinct that fails both existing and future residents.