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23 February 2024

Director - State Significant Acceleration  
NSW Planning, Department of Planning, Housing and Infrastructure  
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**Attn:** Caleb Ball – Assessing Planner

## Submission – SSD-35631707 – Telstra Exchange Site, St Leonards

This submission has been prepared on behalf of Tanert Pty Ltd in relation to the State Significant Development Application (SSD-35631707) proposed at 524-542 Pacific Highway. Tanert Pty Ltd is the registered owner of two nearby commercial sites in St Leonards.

The proposed SSD includes the following development:

42-storey mixed-use development, comprising:

- Retention of the Telstra Exchange facility;
- 21,472m of build-to-rent housing across 34 storeys, including 272 dwellings.
- 3,840m<sup>2</sup> of non-residential space within an 8-storey podium including ground level retail (159m<sup>2</sup>, 2 premises) and short stay accommodation (3,681m<sup>2</sup>, 84 serviced apartments).
- 721m<sup>2</sup> of Key Worker Housing across 1 level, within the podium, delivering a total 10 dwellings to be managed as part of the build to rent development.
- 2,014m<sup>2</sup> of community amenity facilities throughout the building.

Ultimately the development will accommodate 366 apartments with the following unit breakdown identified for the build to rent and key worker housing elements:

- 102 x 1 bedroom;
- 121 x 2 bedroom; and
- 11 x 3 bedroom.

BRS have reviewed the proposed development documentation and whilst our client and BRS are generally supportive of the provision of build to rent and key worker housing in St Leonards, the retention of the existing Telstra Exchange facility creates a significant hurdle in relation to the adaptive re-use of the built form.

The Traffic and Parking Assessment submitted with the SSDA (tppa, REV I, 2023) indicates that 48 car parking spaces, 112 bicycle spaces and 4 motorcycle spaces are to be provided to service 366 apartments. With respect to DCP and SEPP(Housing) 2021 compliance, the report calculated that a minimum of 93 car spaces were required, however due to the constraints of the retained telecommunications infrastructure on-site, the provision of additional parking was not possible. This is a non-compliance of 45 spaces which, in the context of the scale of development proposed, cannot and should not be supported.

The Housing SEPP already facilitates a reduction in parking requirements with 0.2 spaces required per apartment in an accessible area. This is considered to be the bare minimum. As evident in the extract below the justification for the significant parking non-compliance provided in the Traffic and Parking Assessment is inadequate.

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*The confines of the site with the need to retain the Telstra Infrastructure limit the ability to provide conventional ramp access parking and the capacity of stacker parking. Thus it is proposed to provide 48 car parking spaces in an automated podium car stacker.*

*Given the highly accessible public transport services, employment, shopping and entertainment facilities available in the vicinity of the site, it is considered that the proposed parking provision for the development elements will be adequate and appropriate.*

The Traffic and Parking Assessment argued that 48 spaces were adequate and appropriate for the development owing to the proximity of the development to rail, Metro and bus services. Whilst the development is proximate to public transport services it would be completely remiss of the NSW Department of Planning, Housing and Infrastructure (DPHI) to support a development accommodating 366 apartments, many of which are 2 and 3 bedrooms, with provision for 48 car spaces. The non-compliance cannot be justified on the grounds that the retention of the existing Telstra Exchange facility does not allow for the development to achieve the necessary parking. This non-compliance clearly demonstrates that appropriate parking cannot be provided in accordance with the SEPP and DCP requirements and the proposal represents a significant overdevelopment of this specific site.

Further to the above, proposed on-site car parking is reliant on car stacking facilities which are likely to exacerbate the impact of the significant parking noncompliance. The Proponent's Traffic Engineer found car stacking to be adequate with no inappropriate impact to be generated via queueing. This is queried in an operational sense.

Despite the justifications provided in the Traffic and Parking Assessment, it is apparent that demand for street parking will increase significantly in the local area owing to site visitation and the insufficient provision for parking for residents or on-site staff who own or use private vehicles. The development will provide 366 apartments of which 318 apartments will be provided with no parking facilities, not to mention that there is no discussion of parking for visitors to the facilities or workers in the retail / commercial component is discussed in the traffic report. This is not acceptable.

The Traffic and Parking Assessment concluded that parking, traffic capacity, safety and impacts and servicing arrangements were suitable and satisfactory. BRS have reviewed these conclusions and provide the following comments in response:

- Modelling indicates the Pacific Highway/ Christie Street intersection is operating at Level of Service (LoS) B which is 'Good with acceptable delays and spare capacity'. The development modelling indicates there will be no real impact on intersection performance, however that is reflective of SIDRA's inputs which, in the context of this development, only equates to 48 spaces which is a significant variation to the controls. Whilst it is acknowledged that SIDRA inputs are related to number of car spaces within a development and associated trip generation, it would be negligent of DPHI to accept that residents of the development will be serviced by the 48 car spaces only without any additional impacts to street parking as well as visitors. Accordingly the SIDRA analysis is flawed and does not provide a true indication of future traffic impacts.
- The Traffic and Parking Assessment assessed trip generation on the basis that there are only 28 'residential' car spaces to be provided. The traffic report does not provide a clear allocation of spaces and it is unclear how spaces will be allocated or broken down into different land uses. This trip generation identified doesn't factor in cars that future residents own that will not be accommodated within the building. This is not appropriately addressed in the Traffic and Parking Assessment, particularly given the SEPP facilitating the Build To Rent housing already allows a lower parking rate than the DCP.
- The Green Travel Plan (GTP) has been reviewed and there is no certainty that alternate modes of travel will be adopted. The GTP actually states "*The measures proposed will be taken up by the purchaser as a matter of free choice and this modal choice is beyond the Building management*". Modal shift, therefore, is great on paper but difficult to implement or track.

The inability of the existing built form and land use to be adaptively reused to facilitate the parking required is not sufficient for DPHI to support a parking variation of this scale. The provision of 48 spaces for 366 apartments is unsatisfactory and the development will create an unjustified strain on available street parking that services retail and commercial facilities throughout St Leonards which includes commercial holdings owned by our client.

The proposed development must undergo a significant reduction in scale if the Telstra Exchange facility is to be retained within the mixed use development. The importance of this telecommunications infrastructure does not override the responsibility of a developer to provide sufficient parking for future residents. The significant parking non-compliance proposed is not adequately justified and the development as proposed cannot and should not be supported.

Any queries can be directed to the undersigned on [ben@brs.com.au](mailto:ben@brs.com.au) or 9659 0005.

Yours faithfully,



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**Barker Ryan Stewart Pty Ltd**