

13 November 2019

15254

Craig Wrightson  
General Manager  
Lane Cove Council  
48 Longueville Rd  
Lane Cove NSW 1595

Attention: Michael Mason, Executive Manager Environmental Services

Dear Mr Wrightson,

**Planning Proposal - Supplementary Information  
524-542 Pacific Highway, St Leonards (Telstra Exchange Site)**

Following our meeting of 10 October 2019, several additional issues were raised in relation to the planning proposal for the Telstra Exchange Site that is currently being considered by Council.

This letter provides additional information to address those issues, and is accompanied by the following documents:

- Supplementary design information, prepared by PTW Architects (**Attachment A**); and
- Traffic Generation Analysis letter, prepared by GTA Consultants (**Attachment B**).

**Issue 1: Quality of office floor space**

Issue: Council noted that one of the land use objectives in the *Draft St Leonards and Crows Nest 2036 Plan (Draft 2036 Plan)* is to “allow mixed-use development on key sites to encourage more A-grade commercial office floorspace and encourage revitalisation of St Leonards”. Council’s key contention was that the site will not necessarily be able to provide A-grade floor space.

Response: PTW has undertaken an analysis of the commercial floor space that could be provided in the future redevelopment of the site, based on the Property Council of Australia’s *A Guide to Office Building Quality (3<sup>rd</sup> Edition)*. It is noted that the criteria in this document are a guide and not a strict set of regulations – the document specifically notes that “it is not necessary to achieve every parameter nominated in this guide. However, to qualify for a particular quality grade, it is anticipated a building will overwhelmingly meet the stated criteria.”

The analysis shows that all criteria are theoretically able to be met in the future development. In relation to the floor plate parameter, levels 6-9 are able to meet the minimum size, while it is suggested that levels 3-5 could be combined into a single tenancy to achieve sufficient NLA.

Overall, it is considered that the quality of the commercial floor space is capable of being extremely high and would generally meet all the criteria for A-grade commercial floor space. The development is therefore consistent with the objective of the Draft 2036 Plan to “allow mixed use development on key sites to encourage more A-grade commercial office floorspace”.

**Issue 2: Setback to New Hope development**

Issue: Council queried the compliance and appropriateness of the podium setback to New Hope.

Response: The following points are noted in relation to the eastern setback to New Hope:

- New Hope provides a 7m setback from its western boundary to the Telstra Exchange.

- The proposed design for the Telstra Exchange Site provides a 6m setback for the height of the podium, which will contain commercial uses.
- The total separation is therefore 13m for the podium levels.
- Lane Cove DCP (Part D – Commercial Development and Mixed Use) provides that:
  - a minimum of 12m separation should be provided between towers (Section 4.4 and controls for Block 3) – this is achieved; and
  - for commercial development sharing a boundary with a residential zone or business zone, a side setback of 6m should be provided (Section 1.1.6) – this is achieved.
- The original Statement of Environmental Effects for New Hope, prepared by Urbis, anticipated future commercial uses on the Telstra Exchange Site with a separation of 13m, and noted that the most affected apartments are at or significantly above ADG minimums, and that the main occupancy times for the commercial development would not align with the occupancy times for the apartments. Primary balcony areas are also oriented away from the Telstra Exchange Site.
- The affected units will already receive less than two hours of solar access in mid-winter – the proposed development does not further impact the solar access of the affected units in New Hope.
- Above the proposed commercial podium, the residential component of the tower complies with the Apartment Design Guide by providing the full 24m separation distance, even though the Apartment Design Guide only calls for development to provide half of this from the boundary. The proposal has opted to set back further to compensate for the approved, non-compliant New Hope setback.

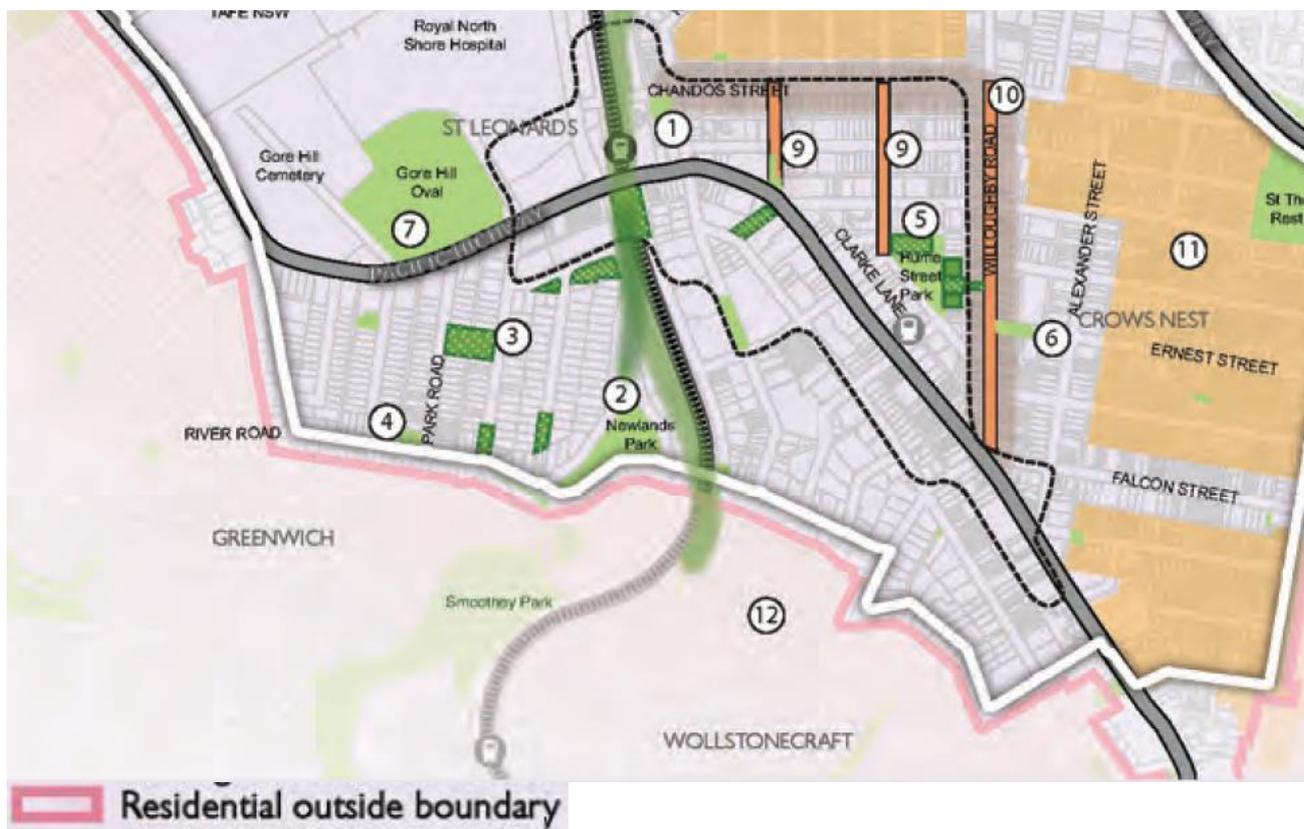
Based on the above, the proposed commercial and residential setbacks are considered appropriate and are compliant with the relevant DCP setbacks and Apartment Design Guide separations.

### **Issue 3: Overshadowing of residential outside boundary of Draft 2036 Plan**

Issue: Council noted that the proposal may not comply with the sun access plane in the Draft 2036 Plan for residential areas outside the nominated boundary.

Response: The Draft 2036 Plan shows a boundary for ‘residential outside boundary’, to which the sun access plane relates.

An extract showing this boundary is shown at **Figure 1**.



**Figure 1 Residential outside boundary**

Source: Draft St Leonards and Crows Nest 2036 Plan

The boundary commences approximately one lot back from River Road. PTW has undertaken an analysis to determine whether the proposal encroaches on the ‘residential outside boundary’ area.

The analysis shows that at 9 am on June 21, when the shadow is at its most extreme, the building does not encroach on the ‘residential outside boundary’ area as defined by the Draft 2036 Plan. By approximately 9:15 am, the shadow recedes and no longer falls on any lots beyond River Road.

Based on this analysis, our view is that the proposal complies with the ‘residential outside boundary’ sun access plane as defined by the Draft 2036 Plan.

**Issue 3: Reuse of the Telstra Exchange**

Issue: Council questioned whether the Telstra Exchange would be able to be integrated into the development should Telstra no longer require the building.

Response: As per information previously submitted with the planning proposal and now resubmitted with the supplementary information, PTW has undertaken an analysis that has determined that the Telstra Exchange could easily be adaptively reused and has the potential to accommodate a range of alternative uses that would benefit the locality, including a new activated public link through the site.

**Issue 4: Redevelopment potential of AMA site**

Issue: Council questioned the impact of the proposed development on the development potential of the AMA site.

Response: As per information previously submitted with the planning proposal and now resubmitted with the supplementary information, PTW has undertaken an analysis that shows that the AMA site is already heavily constrained by the New Hope development and minimal setbacks that were adopted. The redevelopment of the

Telstra Exchange site would have very minimal impact on the developability of the AMA site, as its northern boundary setback is almost completely dictated by separation requirements from New Hope.

#### **Issue 5: Traffic generation of proposal versus development under current controls**

Issue: Council raised general issues around traffic generation of the proposed development.

Response: GTA has prepared a letter (**Attachment B**) that compares the traffic generation of the proposed mixed-use development with the potential traffic generation of a fully commercial development under the current controls.

The analysis shows that a compliant commercial use under the current controls would produce in the order of 150 per cent more traffic movements than the proposed mixed-use building. This is largely due to the residential use generating significantly less vehicle movements than the commercial use.

This analysis shows that the planning proposal, with its proposed change from B3 Commercial Core to B4 Mixed Use, would actually result in a decrease in the overall maximum potential traffic generation.

We trust that this information is sufficient to show that the planning proposal does not result in any wholesale change to the potential traffic generation of the site, and that further detailed analysis of the traffic generation of a specific development proposal would more appropriately occur at development application stage.

#### **Conclusion**

We trust this supplementary material serves to address the most recent issues raised by Council. This material is supplementary information and should be treated as part of the planning proposal for the site.

Should you have any questions, please feel free to contact me at [andre@ethosurban.com](mailto:andre@ethosurban.com).

Yours sincerely,



**André Szczepanski**  
Principal  
9409 4940  
[andre@ethosurban.com](mailto:andre@ethosurban.com)