



20th March 2026

Hon Paul Scully MP
Minister for Planning and Public Spaces
Via the NSW Planning Portal

Dear Minister,

**Subject: OBJECTION — State Significant Development
Application SSD-80626208 8–10 New McLean Street, Edgecliff.**

I make the following submission in my capacity as a Councillor, but not on behalf of Woollahra Council (the Council). My submission is based on my knowledge of and involvement in the Double Bay Ward as an elected, local representative for 8 years and as a Woollahra resident for 34 years. I have also listened closely to those parts of the community most directly impacted by the proposal to better understand their circumstances and concerns.

HOUSING CRISIS

We're told we're living in the middle of a nationwide housing crisis, which is particularly acute in NSW and especially Sydney, where housing costs have become all but unaffordable.

We're told that we need drastically altered planning controls to address this crisis with Low and Mid Rise (LMR) Housing Provisions and the Infill Affordable Housing Provisions (the Affordable Housing Bonus).

If this is indeed the case, then there could not be a better example of the complete opposite of any such well-intentioned reforms than this development application.

Far from providing much needed affordable accommodation for lower income families, SSD-80626208 seeks to demolish the existing 106-unit residential complex and replace it with a 65-apartment building. That's a conclusive loss of 41 homes, almost 40% of the current stock.

Nothing could be more damaging to any ambitious policies aimed at increasing housing supply.

And as if that weren't bad enough, the mix of apartments goes from the current blend of older style affordable studios, one bedders and two bedders, to completely unaffordable luxury two and three-bedroom apartments.

This "Stage 1" apartment mix is not only non-compliant, but a cynical insult to the single-person households and young people saving to enter the housing market; the very groups affordable and infill housing policies are intended to serve.

LABOR PARTY VALUES

Please do not be distracted by empty claims regarding the potential of the so called “Stage 2” to address any compliance issues.

There is no definitive plan, no lodged application, no approved plans and no consent. There is no legal obligation on the proponent to build Stage 2, no timeframe for doing so, and no mechanism to enforce compliance with the no net loss requirement if Stage 2 is never built, is built later to a reduced scale, or is approved under different conditions.

“Stage 1” needs to be viewed in isolation and is obliged to conform in and of itself. There is no such thing as a “temporary non-compliance.” It either complies or it doesn’t. Approving “Stage 1” in isolation permanently reduces Woollahra’s housing stock by 41 dwellings whilst simultaneously enabling the developer to benefit from such an enormous increase in site value due to rezoning. The community bears the cost; the developer takes the profit. Nothing could be more inequitable, more alien to Labor’s social values, or more of an affront to policies specifically aimed at significantly increasing affordable housing in NSW.

ABUSE OF RESOURCES

No matter how much we may pretend otherwise, the biggest cause of the housing shortage and threat to affordable housing is not slow Council approvals, it’s not a lack of development opportunities, or excessive immigration post-Covid or “NIMBYs.” It’s a shortage of and the associated prohibitive cost of building supplies and builders.

You can’t blame developers for falling prey to the allure and excessive profit margins of developing luxury dwellings in more affluent areas.

But what the government will be inadvertently doing by approving this application is tying up hundreds of tradespeople and incalculable resources to build homes very few can ever afford and reducing, rather than increasing, the number of dwellings by over one third.

Meanwhile those same workers and building supplies could have been much better utilized elsewhere to actually deliver more homes which more people could actually afford.

5 LEVELS OF EXCAVATION to a depth of 16.2m and enough concrete to build underground parking for 134 cars to service just 65 luxury apartments. 8m away from existing residential buildings in a heritage conservation area where houses adjacent to deep excavation have a tendency to collapse.

Does anyone believe this is a sensible or worthy use of either people or resources? Can anyone fool themselves into imagining that a development which provides more accommodation for cars than people is solving the housing crisis?

COMMUNITY CONCERNS

There are plenty of other serious concerns amongst the community, which I believe other submissions have addressed more fully, such as:

- Catastrophic construction noise on all surrounding residents, with exceedances up to 31 dB above NMLs and no binding CNVMP before consent
- Vibration risks to both residents and heritage fabric unassessed and unmitigated
- Removal of 152 of 203 trees, including 114 native species and in proximity to a threatened species specimen

- Critical infrastructure resolution – sewer diversion, electrical design – deferred to post-consent conditions
- Omission of private residential viewpoints from the visual impact assessment.

But the fundamental issue is this: given its self-confessed breaches and flagrant disdain for our planning controls, one could only in all good conscience approve this development application if you genuinely believed that it is furthering the greater good or taking even the most minute step towards providing much needed, more affordable housing. If it isn't, and by its own admission, it isn't, then it must be refused.

Yours sincerely

Cr Mark Silcocks.