

THE PADDINGTON SOCIETY INC  
FOR COMMUNITY AND HERITAGE  
EST 1964

Department of Planning, Housing and Infrastructure

23 March 2026

For the attention of Joseph Chan & Minister Paul Scully, Minister for Planning and Public Spaces

**OBJECTION to SSD-80626208 – 8-10 New McLean Street, Edgecliff**

On behalf of The Paddington Society, the local communities of Paddington and Edgecliff and those adjacent to the north and east, this submission outlines our **objections** to the above SSD.

**The SSD seeks development consent for:**

- Demolition of all existing structures on site, clearing of trees & vegetation and site preparation.
- Torrens title subdivision of the site into 2 lots: the smaller western lot, the subject of this SSD proposal, will be Stage 1.
- The larger, eastern lot is to remain vacant in anticipation of a future Stage 2 SSD application.

The exhibited planning proposal seeks to amend Woollahra LEP 2014 to:

- Increase the HOB to RL 91 (18 storeys)
- Increase FSR to 3.7:1
- Incorporate delivery of affordable housing in perpetuity
- Include a provision for a 'no net loss' and apartment mix clause to
- Ensure a range of apartment types and sizes is provided.

**The estimated cost of delivering the proposal is \$63,282,198 (excluding GST)**

**The EIS notes that:** "...feasibility testing has resulted in an adjustment to the overall project such that it is intended to be delivered in two parts".

- There is no guarantee – and no legal requirement - that a future Stage 2 will ever eventuate in the previously proposed, undefined, significantly larger, bulkier building envelope of the 18 storey tower.

**Appropriate assessment of the development on the site cannot meaningfully proceed without assessment of the impacts of both Stages 1 and 2.** Mandatory considerations in the assessment of this SSD must be as set out in **SEARs Part 6: Built Form and Urban Design:**

- *Demonstrate how the proposed built form (layout, bulk, scale, separation, setbacks, interface and articulation) addresses and responds to the context, site characteristics, streetscape and existing and future character of the locality.*
- Figures in the Visual Impact Assessment repeatedly illustrate and confirm the visual impacts of "massing and building envelopes" of **both Stages 1 and 2** in Photomontages from different viewpoints.

**Strategic planning relevant to Edgecliff and the proposed development**

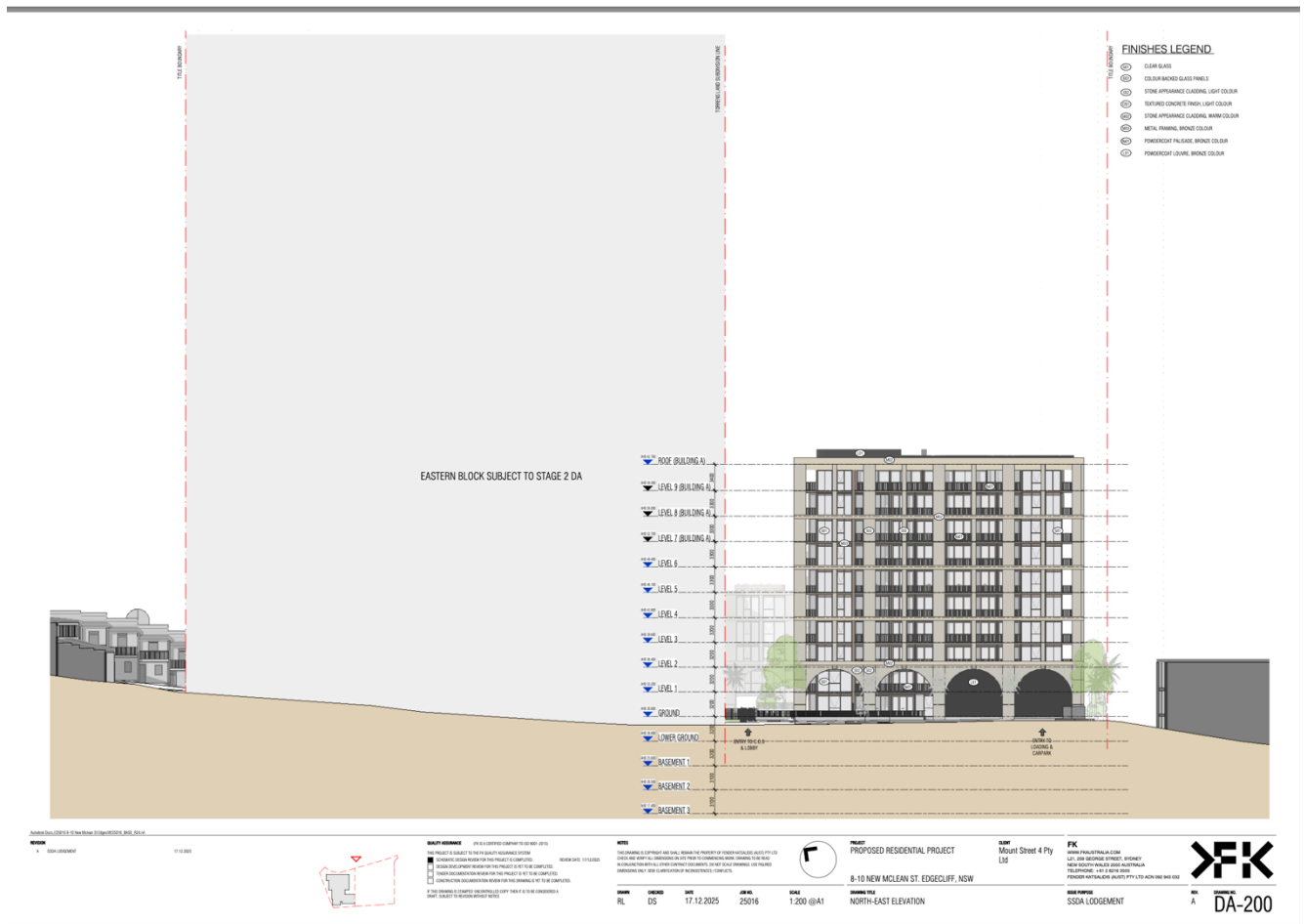
Fundamentally, the SSD is another example of ad hoc, site-specific 'planning' rather than an integrated view about how the overall Edgecliff centre will develop and how that development will be supported by appropriate infrastructure.

- The proposed development is antithetical to proper, structured and integrated planning.
- The applicant argues that the proposal is consistent with various NSW Government strategies, notably: so-called state priorities, the *Metropolis of Three Cities* strategy (particularly objectives 10 and 11 dealing with housing issues) and *Transport 2056*, and the *Eastern City District Plan*.
- The SSD seemingly makes no reference to the draft *Sydney Plan*, the current government’s successor to the ‘three cities’ strategy from 2018. The draft Plan refers to “priorities” and “responses”. Relevantly, the draft Plan highlights increasing the supply of housing, but it also refers to priorities such as, “Diverse and changing communities” and “Access to open space, infrastructure and services” and responses such as: “Align infrastructure to planned growth” and “Grow and connect public open space”. Assessment of the SSD must consider the draft priorities and responses.
- In short, the EIS for the SSD ‘cherry picks’ the various strategic planning documents to justify the proposed development. For example, it refers to:
  - a. Objectives 10 and 11 in the ‘three cities’ strategy, when the Strategy includes other Objectives also relevant to the proposed development. For example: Objective 1 is that, “Infrastructure supports the three cities”; Objective 2 is that “Infrastructure aligns with forecast growth; Objective 3 is that “Infrastructure use adapts to meet future needs”; Objective 5 is that “Benefits of growth realised by collaboration of governments, community and business”; Objective 6 is that “Services and infrastructure meet communities’ changing needs”; and Objective 39 seeks “a collaborative approach to city planning”.
  - b. Priority 5 in the Eastern City District Plan, when the Plan’s other priorities include: Priority E1 “Planning For a city supported by infrastructure”; Priority E2 “Working through collaboration”; Priority E6 “Creating and renewing great places and local centres, and respecting the District's heritage; ”Priority E10 “Delivering Integrated land use and transport planning and a 30 minute city”; Priority E17 “Increasing urban tree canopy cover and delivering Green Grid connections”; and Priority E18 “Delivering high quality open space”.
  - c. It fails to address the priorities and responses in the draft Sydney Plan. In any event, a focus only on the housing priorities and responses in the draft Plan will fail to address the need for balanced planning that considers a range of environmental planning considerations implicit in the draft Plan.

### **Planning Proposal – background and concerns**

- Woollahra Council and community members are aware of a previous planning proposal submitted by the applicant for 8-10 New McLean Street. This sought to increase the maximum building height standard to RL 110.0 and increase the Floor Space Ratio (FSR) over the site to 4.5:1. A 25-storey building was proposed for the site, including a podium of 3-10 storeys.
- Council staff and WLPP assessed this as “excessive in bulk and scale, identified lack of strategic and site-specific merit, and resolved not to proceed; in November 2024 the proposal was withdrawn.
- However, if the increased RL and FSR were to be re-submitted for a future western lot Stage 2 SSD, it *could* create a development some three times the bulk and twice the height of this SSD for Stage 1.
- The proposed site subdivision into two lots, in anticipation of a future undefined stage two SSD, heightens community concerns about the above possibility. Deferring provision of an increased number of Affordable dwellings, community facilities, etc into the undefined Stage 2 would enable the developer to seek a height bonus, for such an increase in RL and FSR above the standards for Stage 1.

- Such concerns are not hypothetical; they are well founded. Council and the community have seen several scenarios where approved SSD and LMR proposals, ie. 136-148 New South Head Road (1 Darling Point Road), sought *and obtained* RL and FSR increases, using the same mechanisms.
- The Visual Impact Assessment indicates several viewpoints where the future massing envelopes of the ECC are indicated; **an increased RL for Stage 2 would be of similar height and increased bulk.**
- We note that the outlined bulk of the EASTERN BLOCK SUBJECT TO STAGE 2 DA on elevations for this SSD is significantly higher than that for the 18-storey height and bulk of the approved building envelope, and does not indicate prescribed RL step downs towards the adjacent terrace houses.
- **It appears to indicate the bulk of the former 25-storey proposal refused in 2024, reinforcing the above noted concerns.**
- **The proposal is misleading, not presenting the full extent of redevelopment on the site as originally described.**



In a 3-2 split decision on 9 December 2025, the Strategic Planning Panel of the Sydney Central City Planning Panel decided to recommend to the Minister that the instrument be made, subject to:

- “That the planning proposal is updated prior to submission for finalisation to include a maximum height of building map which is consistent with Figure 2 within the indicative Site Specific Development Control Plan (DC) (Attachment A17 – Appendix Q – Site Specific DCP of the Post Exhibition Report), and the heights described in SJB’s Urban Design Review - Final Recommended Envelope (Attachment A19 – SJB Independent Urban Design Review - Final Recommended Envelope of the Post Exhibition Report).*

- b) *The Panel further recommended that future parking provision included with a Site Specific DCP should be a maximum rate rather than a minimum rate.*

**Translation of strategic intentions to development on the ground *must* consider the total site and context.**

Going back over 40 years, decisions by the Land and Environment Court have emphasised the need for consent authorities to give fully and properly consider the various 'heads of consideration' when determining development applications.

Section 4.15 of the *Environmental Planning and Assessment Act* requires consent authorities to consider, among other things:

- a) *the provisions of various planning instruments and associated documents*
- b) *the significant likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,*
- c) *the suitability of the site for the development.*

Section 65 of the *Environmental Planning and Assessment Regulation 2021* does not apply to the SSD. This is because the SSD application is 'standalone'; it is independent of what development may happen on the eastern part of the site. Development on the eastern part of the site is not "*other development,*" as it cannot reasonably be construed as "*development that is likely to be, or will be, required to be carried out as a result of the development that is the subject of the development application.*"

**In other words, the cumulative impacts of the two developments need to be fully assessed by the applicant and fully considered by the consent authority.**

**1. Context & dwelling yield: reduced dwelling numbers & net loss of 104 Affordable dwellings**

- **Stage 1** replaces the two existing low-rise buildings, presently including 106 small dwellings (of which 50 are Studios) with a total of just **65** new dwellings, (24 x 2-Bed and 41 x 3-Bed apartments) in the 10-storey tower building.
- **Just two** of the dwellings at ground level are to be dedicated as Affordable in perpetuity. This is an unacceptable outcome, and contrary to a key and much proclaimed objective of the NSW Government to provide more Affordable housing.
- **Stage 1 alone therefore results in net dwelling loss of 41 dwellings.** No Studios or 1-Bed units are proposed. This is an inappropriate dwelling mix, and an unacceptably low dwelling yield, particularly in this location, so close to the well serviced train station and bus interchange, with bus services extending further east in the LGA.
- Five basement levels are now proposed (in lieu of the three in the previous iteration) indicating a total of 140 car spaces, including 118 for residents, 16 for visitors, 6 utility spaces, 16 motorcycles and 124 bicycle spaces, including 30 for visitors.
- These numbers are excessive, as noted above for this strategic location close to the transport hub.

**OBJECTIONS from The Paddington Society and surrounding local communities include:**

**2. Context & location:** The site is at the main gateway to the Eastern suburbs:

- The Society supports the provision of additional housing stock, particularly affordable housing.

- We note that Woollahra Council's *Edgecliff Commercial Centre Strategy* (ECC) proposes uplift on nine sites, to include affordable housing, community infrastructure and public domain benefits.
- With other developments already proposed, approved and/or underway in the LGA, Council is already well advanced towards meeting and exceeding the State Government's dwelling targets.

### 3. Public benefit:

- No public benefit is achieved, in fact, public benefit is *reduced* by this SSD.
- In reality 106 genuinely affordable dwellings are proposed for demolition, significantly reducing dwelling numbers on the site. If approved, this would be a very unwelcome precedent in this already very dense part of the LGA.

### 4. Background: The site at 8-10 New McLean Street, was specifically *not* included in the ECC.

- Its location in the Paddington Heritage Conservation Area, adjoining Trumper Park, and presently screened from New McLean Street by mature trees, it is directly adjacent to several of the oldest 19c two and three storey terrace houses at the western end of Cameron Street and tiny Bowes Avenue, where parapets prominently note the construction date of 1881.
- The initial proponent-led proposal in August 2024 included a 25-storey tower, with a podium of 3-10 storeys with some commercial premises and a total of some 256 dwellings. Council considered the concept design "lacking in strategic and site-specific merit" deeming it excessive in bulk and scale.
- The Society believes that the bulk and scale of the current 10-storey proposal with five basement levels, i.e. exclusive of the undefined 18-storey development proposed on the eastern part of the site, still lacks "site-specific merit". Commercial and food and beverage and community facilities are absent in this proposal. The EIS describes the proposal as "*slender in form*" but the documents contradict that description.
- The proponent-led proposal for the site is now one of three declared SSD, in proximity to Edgecliff Station, all situated at the main gateway to the eastern suburbs. This site is directly opposite the Edgecliff Centre at 203-233 New South Head Road. A little to the east is 136-148 New South Head Road (1 Darling Point Road). The latter two sites propose uplift to 37 and 17 storeys respectively, greatly exceeding the ECC 26 and 12 storeys, endorsed by Council after extensive research and community consultation.
- **The cumulative impacts of these proposals, each proposing uplift well in excess of that endorsed for the ECC**, will have extensive detrimental impacts on the Heritage Conservation Areas of Edgecliff, Paddington, adjacent Darling Point and Woollahra, with flow-on impacts to Double Bay and Rose Bay further to the east, where proposals for significant uplift on numerous sites have already been lodged under the Low & Mid-Rise Housing Policy.
- **Adverse cumulative impacts include:** overwhelming bulk and scale, overshadowing, excessive excavation, insufficient supporting services and infrastructure, limitations on open space and recreation facilities, and massive construction, traffic congestion, and flow-on parking impacts.

### 5 & 6. Design Quality / Built Form and Urban Design:

The proposed built form, height, bulk, scale and interface with the New McLean and Cameron Street dwellings and those in tiny Bowes Avenue to the south will be overwhelming and massively dominant.

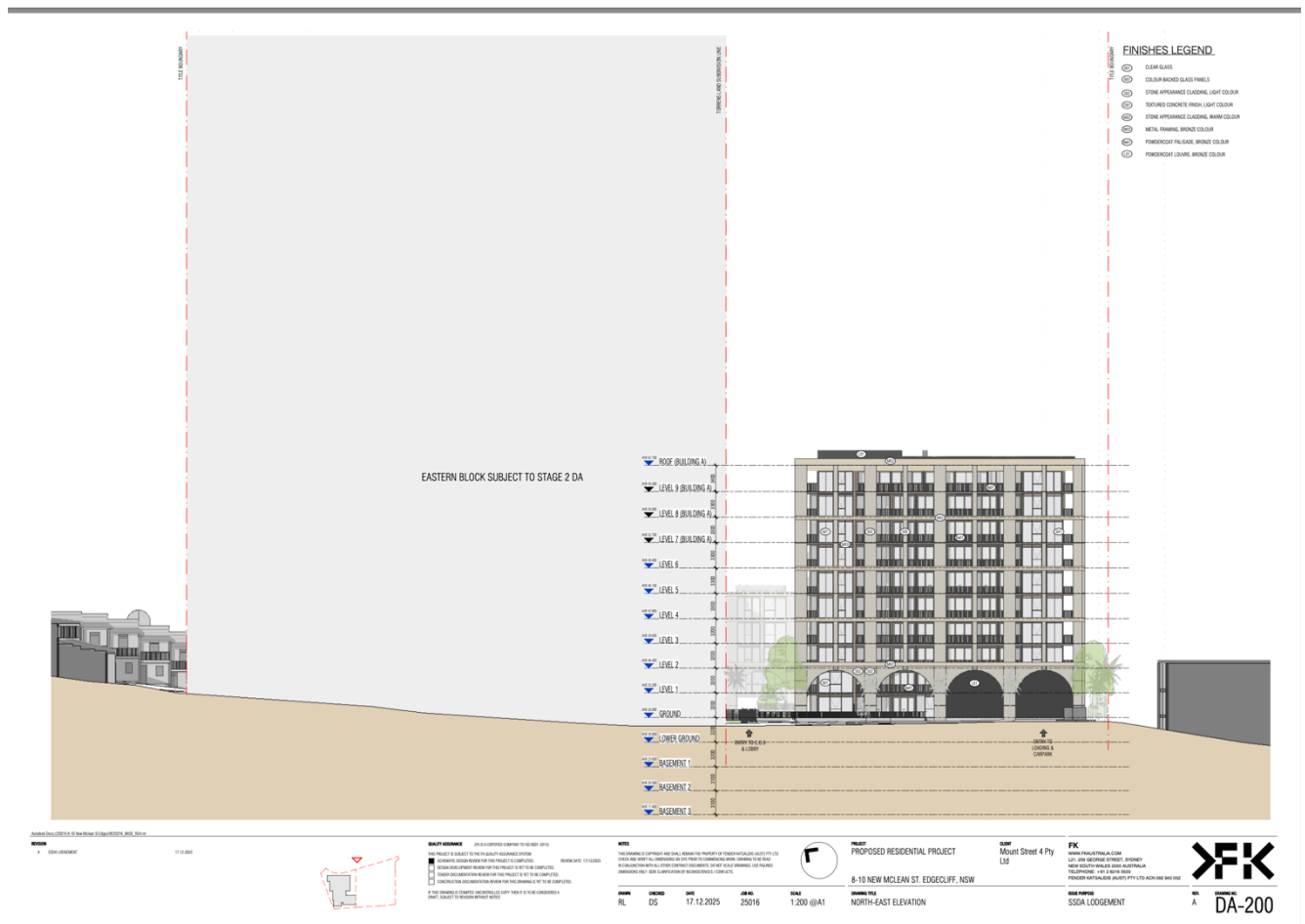
- The architectural drawings indicate that the Stage 1 built form remains excessive and bulky in this context.
- Sited close to the curve of New McLean Street, with wide street level arched openings for vehicle access and egress and with a freestanding blank walled substation on the front boundary, there will be minimal scope for the narrow perimeter areas of landscaping designed for Stage 1 to screen and soften the presentation of the building to the street.

### 7. Environmental Amenity:

- **Solar access** to several surrounding terraces and residential dwellings, particularly to those in Bowes Terrace to the south, including overshadowing of their private open spaces will be an unwelcome outcome if even Stage 1 of the proposal receives consent.

### 8. Visual Impact:

- At eight storeys greater in height and some twice the width of of Stage 1, the Stage 2 built form, if it ever eventuates, will be even more overwhelming; it will be highly visible from multiple locations to the north, east, west and from an extensive number of southern locations across Trumper park and oval and upwards in the catchment along the Paddington slopes towards Oxford Street.



**We note that the outlined bulk of the EASTERN BLOCK SUBJECT TO STAGE 2 DA on this and other elevations, as illustrated above, is significantly higher than that for the 18-storey bulk of the approved building envelope, and does not indicate the prescribed step-downs in RL towards the adjacent terrace houses in the HCA.**

**It appears to indicate the height and bulk of the former 25-storey proposal refused in 2024.**

## 9. Transport, traffic, congestion and flow-on parking impacts

The road network at the four-way intersection of New McLean Street, New South Head Road and Darling Point Road intersection and the intersections further to east and west are already close to capacity, and regularly beyond capacity, particularly at morning and afternoon peaks and school pick-up periods.

- Extensive traffic congestion is experienced daily by road users of the whole LGA, extending to all suburbs, including Double Bay, Woollahra and as far afield as Vaucluse and Watsons Bay. Traffic in both directions is banked up for hours in excess of traditional and measured peak periods on weekdays *and* weekends.

**The development proposed as Stage 1 of this SSD *and* the related future Stage 2 (if it eventuates) will significantly add to congestion, particularly during construction. It will:**

- Add to queuing of traffic seeking to exit from New McLean Street, and exacerbate existing queuing of traffic seeking to leave Darling Point Road.
- Critically for this site and its context within the precinct, noting developments already approved and under construction, the proposal will add to queuing problems for east-bound traffic looking to turn right from New South Head Road into New McLean Street to residential and commercial premises.
- Traffic seeking to turn right out of New McLean Street into New South Head Road face even more delays, frequently only two vehicles can exit the intersection during one phase of the traffic lights.
- In peak hours and even outside of peak hours, right-turning traffic already extends back into the through lanes on New South Head Road, causing delays for traffic heading further east.
- This intersection is the only access to this development and the Edgecliff Centre and Eastpoint sites, plus the large housing development at 180 Ocean Street. All are accessed from New McLean Street.
- Signal phasing for pedestrian movements is likely to be compromised, and safety for cyclists is also likely to be dangerously impacted, particularly if frustrated drivers start making *ad hoc* or ill-judged movements to escape delays on and around the intersection.
- **The application's proposals to deal with the development's traffic impacts are inadequate.** Analysis noting that there will be a "*negligible*" increase in traffic generated by the new development when completed is difficult to believe, particularly if Stage 2 ever accentuates.
- A more fundamental re-think and re-assessment of road transport in this area, one that will almost certainly require significant investment by the NSW Government, is necessary if this aspect of the impacts of the development is to be satisfactorily addressed.

### **Parking impacts and overflow to adjacent and surrounding residential areas:**

- Flow-on congestion impacts, already severe, will spread to areas in all directions further afield. Visitors to the shopping centres already park in residential streets in Edgecliff, Paddington, and Darling Point. Those streets are also full to capacity, as most of the terrace houses in the HCA do not have off-street parking. There is no practical constraint on street parking already used by visitors.
- We note that no major upgrades of the road infrastructure are forecast by the state government.
- Nor can it be argued that development contributions can be used satisfactorily to address the problem. After all:

- a) the per unit contributions fall dramatically short of what would be required for any strategic infrastructure intervention;
- b) even if the per unit contributions were at a substantially higher rate, funds would not become available to actually make the necessary infrastructure adjustments for some time (as a result, there would be probably years of congestion before any potential spending on the necessary strategic solutions);
- c) the contributions are deposited into a pool managed by the NSW Government (notably Treasury) for spending on development- related infrastructure across Sydney. The already critical backlog of infrastructure in other parts of Sydney suggests that those areas would be prioritized for the expenditure of state development contributions towards the provision of state infrastructure.

**Carparking capacity:** five basement levels for car parking in this development is excessive.

- Clearly, in its 9 December 2025 decision on the related planning proposal, the Strategic Planning Panel of the Sydney Central City Planning Panel had concerns about the oversupply of parking for development in New McLean Street. The Society strongly agrees with that view. As set out in this submission, the Society believes that the SD application should be refused. If however the consent authority determines to approve the application, it should be subject to a significant restriction on the supply of carparking.
- In this highly accessible location, with excellent public transport options, there should be fewer cars in fewer basements. The rail line connects to the entire Sydney rail and metro network at Martin Place, and numerous services operate through the Edgecliff Centre. Woollahra DCP 2015 Chapter B4 requires *maximum* parking rates in accessible areas for the proposed apartment mix, as opposed to the 140 spaces to be provided for 65 dwellings.

## 10. Construction - Noise and Vibration and Services

- We note a critical issue identifying that a Sydney Water sewer main runs directly through the proposed building footprint, noting that servicing upgrades will be resolved prior to issue of a construction certificate.
- Documentation regarding diversion of the sewer main does not appear to be addressed. Building over drainage and sewer lines in Heritage conservation areas where numerous properties share single services is always of great concern, particularly with ageing and frequently damaged services.
- Electrical infrastructure is also not yet available for assessment. Electrical supply has not been confirmed with the authorities, and the substation presently prominently located on the New McLean Street frontage has not been addressed in any meaningful sense.
- Whether the substation is to remain in this unsightly location, or elsewhere on the site, remains unclear but is a significant matter for further investigation during the assessment.

## 13. Contamination and Remediation

- Excavation will produce extensive material for disposal. For much of the 19c and well into the 1890s, the area directly to south of the site included thick scrubland on degraded sandstone outcrops, quarried to build villas, cottages, street boundary alignments and public buildings of the emerging suburb.
- Land to the south of the site was marked “Quarry Reserve for use of the Woollahra Municipality”. Quarried sandstone faces border the park, the area later became a dump for ash, and building waste.

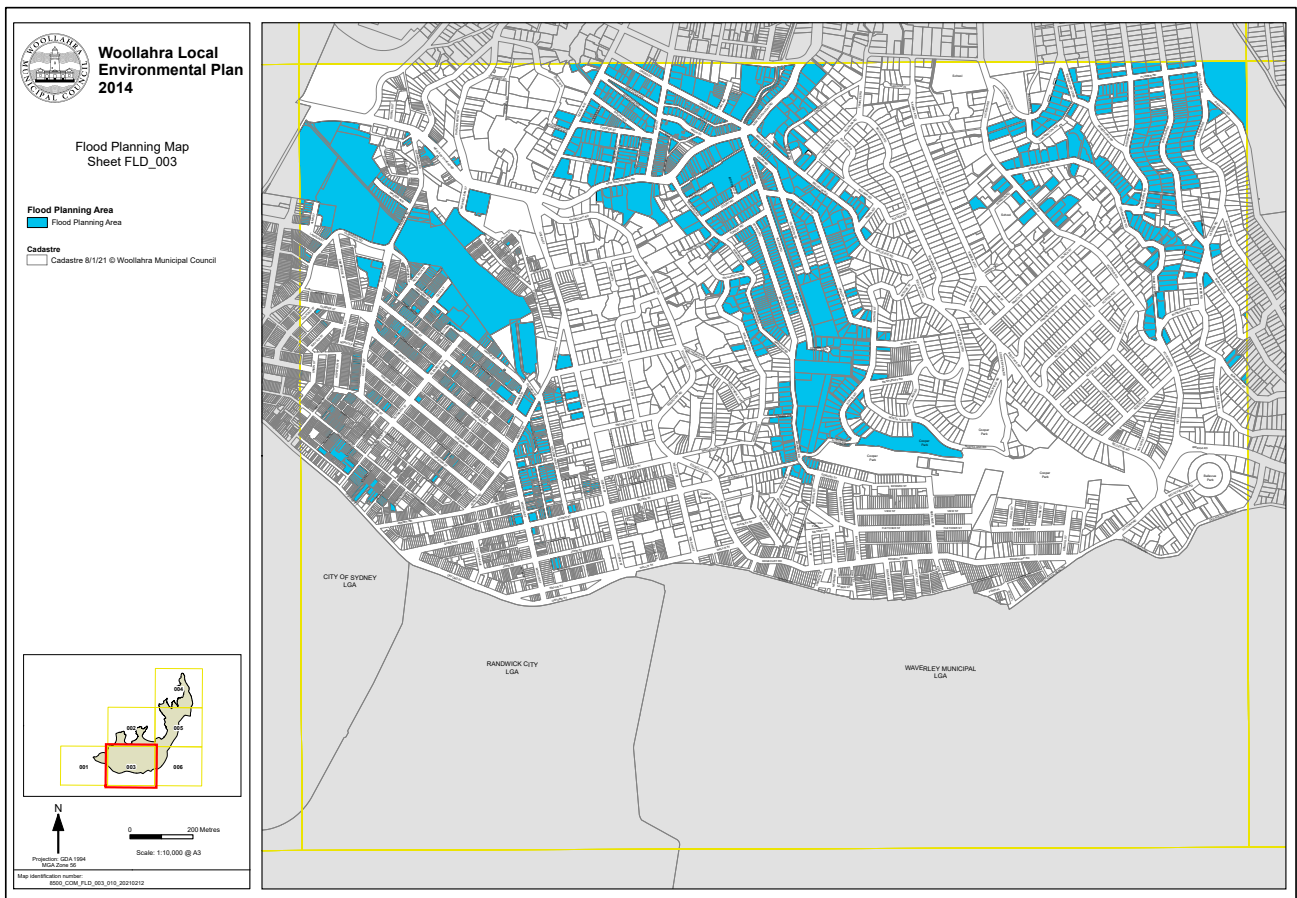
- Much of the excavated material is likely to include contaminated materials. Parts of Hampden Park (later re-named Trumper Oval and Park) had to be filled up to four metres to form the Oval, with much of the contaminated material likely to remain in the fill.
- Residents in Cecil Street to the south of the park regularly report to Council about contamination, and we are aware that asbestos has been identified by WMC as being one of the contaminants in the park, downstream from the *whole* 8-10 New McLean Street site.

## 12. Groundwater and 19. Flood Risk, Water Management

- The Flood Impact Assessment ***incorrectly illustrates and states*** that: "the proposed site lies outside of the Flood Planning Area (FPA)" see Figure 4.2 in the Flood Impact Assessment

### The site and the lands to the south of the site *are* clearly marked on LEP Flood map FLD\_003

- This Paddington lower catchment receives rainwater from former creeks and rainwater cascading to the former ponds originally used for the Glenmore Distillery and the later Tannery – one of these ponds remains a significant feature of Trumper park today.
- Paddington Society and community members living in Hampden, Cecil and Roylston Streets and lanes to the south of the site have often, and still do experience extensive *flooding and debris* flowing down from Trumper Park during and after heavy downpours. This is clearly illustrated in Council's **FLD\_003** (and is also clear in the Figure 4.2 overlay in the application's Flood Impact Assessment)



- Several of the Society's committee members and Woollahra Councillors have been involved with Council's Paddington Floodplain Risk Management Committee since 2015 and beyond.

- We are well aware of the flooding problems in our upper and lower catchment precincts, all exacerbated by ageing and /or inadequate drainage, not yet remedied by Council's flood mitigation projects in recent years.
- Deep basement excavation for the five carparking levels of this SSD will divert groundwater around the basements, impacting the water table, with risk of water penetration and damage to foundations and the minimal footings of the surrounding Victorian properties in proximity, exacerbating risks of already regular flood events in extensive areas of Paddington downhill from the site.
- If the anticipated larger eastern lot eventuates as a future Stage 2 SSD, related basements for *both* stages will further exacerbate the flooding risks.

**It is critical that the Flood Impact Assessment should be independently scrutinised / challenged.**

#### **14. Trees and Landscaping: (see SEARs part 14)**

- It is evident from the Arboricultural Impact Assessment that a significant number of the trees recommended to be *retained* are actually *outside* of the site boundaries to the south and south-west in Trumper Park, adjacent to and bordering the existing footpath in the public domain. These include two of the most important Moreton Bay Figs in the parkland.
- The Society certainly agrees that these trees **must** be retained, and will require "Tree sensitive construction design methods." We also agree that they must **not** be removed.
- However, the significant number of such trees external to the site makes the report very misleading for those who have not been able to examine the report in the limited time available.
- It creates the misleading implication that 51 of the trees impacted by the development and recommended for retention are *ON* the site, whereas more than half of that number are in the parkland, **not ON** the site... a bit of sophistry, seemingly designed to mislead.
- For those concerned about canopy retention and tree removal the numerical assessment of the actual numbers of trees **ON** the site, recommended for (and therefore likely for) removal should be clarified and well publicised to the assessment team, to Council and the community.
- It is presently unclear whether **all** the trees recommended for removal are on the Lot 1 Stage 1 site?
- **Importantly, during the first Lot 1 construction stage of "clearing of trees and vegetation and site preparation" it must be clarified whether the majority of trees recommended for removal on the large eastern Stage 2 Lot, will be removed during preparation for the Stage 1 works?**

#### **18. Social Impact and Public interest benefit**

The Social Impact Assessment is another example of sophistry, misleading in claiming that:

*"The proposed development, will provide a number of public interest benefits", including:*

- Addition of a range of dwelling sizes and contribution to the housing target for the LGA
- Provision of affordable housing for key workers and those on low to moderate incomes in a location that is close to public transport, shops and services
- Employment generation in the planning, implementation, and construction of the proposed development, in the ongoing maintenance of the premises and in the management of the affordable housing units. And that:

*“The proposed development is unlikely to generate any long term or significantly negative social impacts that require mitigation. While it is acknowledged that the proposed development and resultant increase in activity and population represents an intensification of use of the site, that intensification of use is not unexpected given the zoning of the site”.*

**The above claims can clearly *only* be applied to *both* Stages 1 and 2 *after* completion of both. Whereas only Stage 1 is the subject of this SSD. Another seemingly deliberately misleading component of the documents on exhibition.**

**This reinforces the Society’s assertion that it is inappropriate to consider Stage 1 in isolation, and that *both Stages 1 and 2 must be considered together.***

### **Economic Impact**

- Approval of Stage 1 without also addressing the fundamental transport problems mentioned above, may very well have an economic impact on businesses in the Edgecliff Centre and Eastpoint.
- Put simply, increased congestion arising from the SSD development, and that envisaged by the planning proposal, **Stages 1 and Stage 2** may well cause some customers of businesses in the Centre to go to other locations and in turn affect their viability.

### **22. Environmental and Heritage Impacts.**

- The large footprint and building out envelopes of even this Stage 1 building will overwhelm, dominate, and overshadow many of the surrounding residences and their private open spaces.
- It will negatively impact the amenity of residents, visitors, and users of public and private facilities, with detrimental impacts on the natural vegetation and wildlife habitat within the park.
- We disagree with the Heritage Impact Assessment which claims that *“removal of the existing buildings and structures will have a neutral impact on the significance of the Paddington HCA”*
- Existing landscaping within the site boundaries, including that on the eastern Lot, includes an attractive combination of turfed areas, mature trees and vegetation. Since the proposed works involve removal of most of the trees within the site boundaries, this statement is demonstrably incorrect.
- We also strongly disagree with the HIS assertion that the existing low-rise buildings, discreet, set well back from the street frontage in a natural setting and gently stepping down the attractively landscaped site are unremarkable examples of the Sydney School style of architecture.
- Designed in the 1960s by notable Australian architects and urban designers, George Clarke and Don Gazzard and partners, they are modest low-rise buildings, demonstrating sophisticated economical construction methods and careful planning to achieve remarkably successful modest accommodation of limited scale. They respect the surrounding Victorian residential scale of their surroundings.
- The Cameron Court dwellings have been much loved by residents and admired by the architectural and planning communities. Residents include precisely the target market for the NSW Government’s objectives and Planning changes with their claims of provision of additional Affordable housing.
- It is a retrograde step in terms of Environmental and Heritage impact to claim that their demolition and replacement with a 10-storey and presently undefined future 18-torey residential block is an improvement to the Heritage Conservation Area in Environmental and Heritage impacts.

## **IN CONCLUSION:**

**There are substantial grounds for refusal of this Planning proposal, with just an outline of the Society's objections set out on the preceding pages.**

**Without appropriate assessment of *both* Stages 1 and 2 for the overall development on the site, assessment of the impacts cannot meaningfully proceed.**

**Development on the eastern Stage 2 lot is absolutely undefined and uncertain.**

**Further information about final dwelling numbers, and apartment mix, particularly concerning numerical confirmation of Affordable housing provision, is essential for assessment, particularly to ensure addressing the present massive shortfall in Affordable housing provision.**

**Design within the approved building envelopes must be demonstrated, including apartment layouts, sizes, locations, setbacks, landscape and deep soil provision etc.**

**Compliance with LEP and DCP regulations are still unknown for the larger part of the site.**

**Important technical information about services and infrastructure is yet to be researched, confirmed, documented and presented for assessment.**

**Infrastructure and or community facilities required to meet the proposed increased housing provision are not guaranteed on – or even in the vicinity of – this site.**

**So called temporary “*non-compliances*” noted in the documents are not excusable in a project of this magnitude and in such an important location at the Gateway to the municipality.**

**Such critical matters cannot be deferred to a future stage, which may never arrive.**

**Mandatory considerations in the assessment of this SSD must be as set out in SEARs**

**A coordinated traffic report and assessment, including cumulative impacts from all SSD developments in this precinct, plus those associated with existing and potential LMR housing policy uplift sites should be an essential requirement to guide all assessments.**

**The Paddington Society and the local communities in Paddington and surrounding precincts trust that the appropriate staff in the Department of Planning, Housing and Infrastructure will further assess this and the cumulative impacts on our LGA.**

**We trust that they will work with Woollahra Council and the proponent towards a more appropriate proposal which will meet the Government's laudable aims of providing additional housing, including Affordable housing, in perpetuity, and without compromise to the context, workability and amenity of adjacent and surrounding communities, including those further afield in Woollahra.**

**We believe that SSD-80626208 for this site should be refused in its present undefined form.**

Yours faithfully



Esther Hayter

President - The Paddington Society - E: hayters@bigpond.net.au - M: 0411 109 770