THE PADDINGTON SOCIETY INC
FOR COMMUNITY AND HERITAGE
EST 1964

27 October 2026

Ms Kirsten Fishburn
Secretary
NSW Department of Planning, Housing and Infrastructure
Lodged via the NSW Planning Portal

Dear Ms Fishburn,

Edgecliff-Woollahra Precinct State-led Rezoning Proposal
Submission by The Paddington Society

On behalf of The Paddington Society (the Society) and the Paddington community, I am lodging this submission in response to the draft *Edgecliff-Woollahra Precinct State-led Rezoning Proposal* (the Proposal), exhibited by the NSW Department of Planning, Housing and Infrastructure (the Department) from 8 September, originally to 7 October 2026 and now extended to 30 October 2026.

The Paddington Society strenuously objects to the Proposal in its current form.

This submission focuses primarily, but not exclusively, on the impacts of the Proposal on Paddington. However, Paddington is the principal gateway to the whole of the Woollahra local government area (LGA). As such, we also comment on matters affecting Edgecliff and Woollahra, and the broader council area. Ultimately, the Proposal's impacts on transport, infrastructure, and the environment will be felt across much of the northern part of Sydney's eastern suburbs. The loss of heritage items and character is of metropolitan and state significance.

Following this introduction, Section 1 provides information on the Society's efforts over more than 60 years to protect the suburb's valuable heritage. Section 2 places Paddington and Edgecliff-Woollahra in a broader context, and explains how these suburbs (Paddington in particular) are already among the densest in Sydney. Section 3 highlights a number of overarching critiques of the Proposal. Section 4 outlines the Society's objections to the Proposal's initiatives with direct impacts on Paddington, while Section 5: (a) outlines our objections to the Proposal's indirect impacts on Paddington; and (b) highlights other weaknesses with the Proposal. Section 6 sets out our conclusions and views on three alternate courses of action available to the NSW Government. We believe the first of these – not proceeding with construction of the proposed Woollahra rail station, and not proceeding with the rezoning of land in Edgecliff-Woollahra – should be pursued.

1. The Paddington Society and the importance of the suburb's heritage

The Paddington Society was founded in 1964 and is a community association incorporated in New South Wales. For more than 60 years, it has worked to celebrate, protect and conserve Paddington, one of the most intact nineteenth century terrace house suburbs in Australia for future generations. The Society's objectives are to:

- celebrate the distinctive qualities of Paddington as an early Victorian suburb
- protect its historic character, architectural heritage, streetscapes and landscape setting
- conserve Paddington and its community for future generations.

The Society was formed at a time when Paddington faced large-scale demolition for freeways and high-rise redevelopment. In the 1960s, it successfully opposed the proliferation of eight-storey apartment buildings that would have destroyed the character of the suburb. Its advocacy and constructive liaison with Woollahra Council helped establish the planning and heritage controls that now assist in protecting Paddington and significant parts of Edgecliff, including height limits that keep new development to an appropriate scale. Those controls – now in the *Woollahra Local Environmental Plan* (LEP) and associated *Paddington Heritage Conservation Area* (HCA) *Development Control Plan* (DCP) - have been great guides for the community and Council over the last 50 years.

Since those controls were introduced, no intrusive high-rise development of the kind seen in the 1960s has been approved in Paddington. Apart from the eight-storey buildings from that time, the whole suburb is remarkably intact. We believe it should remain so.

The Society continues to engage constructively with Woollahra Council, the City of Sydney and the NSW Government on planning matters affecting Paddington, and regularly makes submissions on all development, including State Significant Developments (SSD) and Low-Mid Rise (LMR) planning proposals.

The Society is not alone in understanding the importance of Paddington's heritage. Paddington, and its unique terraced streetscapes, is widely regarded as one of the best-preserved Victorian-era suburbs in Australia. The significance of the suburb's heritage has been recognised by others for decades. It was recognised by Commissioner Bunning in his 1968 inquiry for the NSW Government into the then-proposed widening of Jersey Road. Paddington, he wrote, is a conservation zone 'of architectural and historical merit', mandating a dedicated plan to guide development. The suburb was registered on the National Estate in 1980, and discussion has started in Council circles for application for UNESCO World Heritage status.

2. The Society's position on development and growth

Despite suggestions that may be made in some quarters, the Society is not opposed to all forms of growth. For example, we have previously supported additional housing near Edgecliff Station while raising concerns about the cumulative impacts of overdevelopment. The Society has also supported other infill development, e.g. various development applications for secondary dwellings and additions to dwellings where the design has shown sensitivity to the character of the local area.

What we oppose is poorly-planned growth: growth that ignores topography, the LEP and DCP heritage controls and infrastructure capacity, that is rushed, and that leaves the hard questions to be resolved later at the development application stage.

We will support additional housing, including genuinely affordable housing, where it is properly researched, properly planned, consistent with the LEP and DCP, and is properly supported by infrastructure.

The current Proposal does not meet those standards.

The wider Woollahra LGA, Edgecliff-Woollahra area and Paddington (in particular) are already some of the densest parts of Sydney. The Proposal would rezone 168 hectares, about 18.9% of the Woollahra LGA, for approximately 9,400 dwellings and a projected 19,740 residents, with towers of up to 34 storeys at Edgecliff and 32 storeys in Woollahra. In the absence of clear information in the Proposal, the Society estimates this would require demolition of some 2,500 existing dwellings.

The Department's conclusions on infrastructure and funding, along with the failure to examine the sequencing of development and infrastructure, provide no confidence that the Proposal will meet the Government's own objectives. About half of the area to be rezoned lies within Heritage Conservation Areas and, across much of the study area, the public domain and amenity will almost certainly be despoiled.

Woollahra Municipal Council has prepared an 'Alternative Approach' which would deliver around 3,600 additional dwellings while respecting topography, heritage, tree canopy and infrastructure capacity. While we do not endorse every aspect of Council's alternative, we strongly agree with its place-based approach, and we urge the Department to work genuinely with Council on that basis. That said, development of the Paddington Bowling Club site, as set out in Council's alternative proposal, is still excessive. The Society recommends that the site be retained with its current RE1 Public Recreation zoning. No tall buildings should be built within the Paddington HCA.

3. Overarching critiques of the Proposal

Our objections fall into three broad categories: overarching critiques, objections to the Proposal's direct impacts on Paddington (discussed in Section 4), and indirect impacts on Paddington and other weaknesses in the Proposal (discussed in Section 5). Further detail on several of the objections is set out in an appendix. The overarching critiques fall into three areas:

- **Preparation of the Proposal has been rushed. Planning to retrofit a large number of dwellings into an already high-density area is complex and needs far more detailed and considered analysis:** It is evident from the Proposal's supporting studies that relatively limited work has been undertaken on various matters critical to the Proposal's success:
  - in some cases, e.g. the flood analysis, it appears that modelling was simplified to enable the model 'runs' to be completed within the time available
  - in many areas, the Proposal is highly speculative, e.g. about rates of development, the impacts of that development on the local area and the need for infrastructure. Greenfield release areas typically go through years of structure planning, infrastructure sequencing and funding agreements before rezoning. Release area planning is not perfect and may sometimes be criticised as being too slow, but this Proposal applies a far-faster rezoning process to a far more complex, established and heritage-rich urban area. The risk of serious mistakes with lasting consequences is very high.

- **The infrastructure elements of the Proposal are deeply flawed:**
  - the fundamental problem is that the infrastructure suggested in the reports underpinning the Proposal is unable to support another 20,000 residents
  - in several cases, the standards of provision, and the associated service levels for users, and the community, are unclear or can't be met
  - expectations of the amount and rate of redevelopment are not specified in any detail, or linked to the service levels and provision of expected infrastructure
  - the identification and definition of infrastructure needed to support the rezoning reflects four presumptions:
    - that the infrastructure forming part of the Proposal will support another 20,000 people.
    - that demand is unlikely to materialise until well into the future (despite the stimulating effect of the proposed Woollahra railway station)
    - certain types of infrastructure are therefore not required until late in the forecast period (or even beyond the 2046 horizon underpinning the studies) or not at all
    - there is no need to commit to the delivery of infrastructure

- this “trust us, we have this under control” approach to the provision of infrastructure struggles for legitimacy and community support
- the supporting studies assume or simply declare, without support evidence, that:
  - the recommended packages of infrastructure initiatives will maintain reasonable levels of service when - in several cases, particularly transport - almost certainly, they will not
  - project scopes are deliverable when, in a number of cases, they may not be.
- the expected cost of the infrastructure, other than a ‘headline’ figure of $1.33 billion (2026$), has not been disclosed. The failure to provide an itemised breakdown, when, clearly, there must have been some form of initiative-by-initiative costing to identify the total cost, further undermines public confidence in the Proposal.
- in any event, the cost estimates are highly optimistic. In some cases, notably among the proposed transport initiatives, the costings appear to be for studies only, not for delivery of any recommended works. Including the cost of any initiatives to emerge from those studies would add materially to the headline cost quoted above. Moreover, the costings do not include the cost of land acquisition.
- history shows that infrastructure projects almost always end up costing far more than first expected. Why would the infrastructure in this case be any different? This bears on funding arrangements and expected timetables for delivery. The ‘devil is in the detail’. Identifying and resolving those critical matters can only come from doing further work, and doing it ahead of any rezoning.
- the proposed infrastructure funding arrangements lack credibility. In short:
  - the NSW budget is already under short - and long - term stress
  - other, competing State priorities are highly likely to ‘crowd out’ funding for the supporting infrastructure
  - the reliance on developer contributions is problematic, in terms of: the total yield from the contributions relative to plausible cost estimates; uncertainty about impacts on development viability and therefore whether and if so when contributions will be received; and the risk of future pressure to reduce contributions to “maintain housing feasibility”
  - there is no guarantee that Housing and Productivity Contributions will ever be spent in and around the Edgecliff-Woollahra-Paddington area. Quite simply, the balance in the Housing and Productivity Fund – only $39 million for the entire state as at 30 June 2025 – is dwarfed by the scale of prospective demands on the Fund.
  - the impacts on Woollahra Council’s budgets, capital spending and rates are likely to be very significant. The *Infrastructure Delivery Plan* claims that Council’s share of infrastructure costs would be $314 million (2026$), although, as noted above, actual costs will be greater than this amount. To place this amount in context, the Council’s *Delivery Program 2025/26 to 2028/29* anticipates $85.7 million (in nominal terms) in capital expenditure over the four years. Actual expenditure in 2025/26 and budgeted outlays for 2026/27 suggest that barely half of this four-year total (51%) could be on new assets (the rest being on asset renewal). On these figures, even the $314 million in expected council infrastructure costs (for all its limitations) is equal to almost 30 years of Council’s total expenditure on new assets for the entire LGA. The impact on Council and local residents is not just the total amount; many of the infrastructure costs will need to be incurred either ‘up front’ or early in the life of the redevelopment, e.g. drainage and flooding infrastructure and the proposed road between Ocean Street and Glenmore Road.
- there are no commitments to the delivery of the infrastructure, other than (perhaps) the station. Delivery of the railway station by 2029 is highly optimistic, but it is only one (highly visible) example among many

- yet, with all of those weaknesses, the *Explanation of Intended Effect* foreshadows that Edgecliff-Woollahra will be rezoned by the end of 2027
- ***This is the antithesis of good, integrated planning. Is this really the standard of planning that should be considered acceptable?***

- **The consultation process has been wholly inadequate for a proposal of this scale, complexity and permanence; the Proposal therefore lacks a 'social licence':**
  - there was no public consultation during development of the Proposal. Instead, the Proposal has to a significant degree been presented as a *fait accompli*
  - however, in contrast to the failure to consult residents, there is reason to query whether the Department liaised with developers during preparation of the Proposal. Residents are aware that a large company with real estate interests had sought expressions of interest for purchase of the 400 Glenmore Road site over the last year. It appears, therefore, that the proposed rezoning of the site may have been put to the Department during development of the Proposal.
  - the community was given just four weeks (since extended to eight weeks) to review three core documents - the *Explanation of Intended Effect*, the draft *Design Guide* and the proposed Maps - and 17 technical studies spread across almost 2,600 pages of content
  - the Proposal is undermined by a lack of transparency. Key information - including transport modelling and a coherent, credible infrastructure funding and delivery strategy - has not been made available for review
  - several of the supporting studies, e.g. in relation to flooding and schools, reach conclusions that strain credulity and fail to align with residents' lived experience
  - many issues remain unresolved, and the documents repeatedly defer resolution of those issues to later stages. Too many fundamental issues are deferred to the development application stage. Once key development standards, such as height and floor space ratios, are in place, the opportunity to get the planning and design 'right' is lost. Matters such as flood risk, heritage impact, amenity impacts and infrastructure capacity must be resolved before rezoning, not after
  - despite weaknesses in the consultation process to date and fundamental gaps in several of the documents, the Department proposes no further consultation prior to rezoning of Edgecliff-Woollahra
  - The number of submissions from residents in Edgecliff-Woollahra and Paddington, and the strength of their objections, demonstrates that the Proposal has failed to secure a 'social licence'.

4. Direct impacts of the Proposal on Paddington

Although the Proposal is described as the Edgecliff-Woollahra Planning Proposal, it will have several direct impacts on Paddington. The impacts and the Society's objections are as follows:

- **Paddington is distinct from Edgecliff and Woollahra:** The Proposal seeks to rezone parts of Trumper Park and its environs to permit residential development and permit high-density development in the Rushcutters Creek valley and at Edgecliff. The park, including the Bowling Club, and the valley are part of Paddington and serve the Paddington community. They should not be treated as part of an Edgecliff-Woollahra growth precinct.

- **The Proposal will destroy many important heritage items and fundamentally undermine the existing Heritage Conservation Areas (HCA):** The Proposal is a reflection of the strategic direction for Sydney set out in *The Sydney Plan*. It is profoundly disappointing to see that the Plan contains only four references to "heritage", all of them related either to Indigenous heritage and/or the UNESCO listing of the Blue Mountains.

These are very important considerations; the Society does not dispute them; but ***the absence of a <u>single</u> reference to built-heritage in The Sydney Plan says volumes about how little this features in the Government's thinking. As far as we can tell, this is the first metropolitan strategy in around 40 years (perhaps longer) that has not made at least some reference to the protection of such forms of heritage.***

- This is reflected in the weight given to heritage conservation in the Proposal. Over 50% of the precinct is within a HCA. The inter-related Paddington and Woollahra HCAs will be diminished by the extensive loss or compromising of heritage items in Woollahra. The *Heritage Assessment Report* is highly problematic; its Executive Summary states, 'the preferred masterplan is capable of being supported from a heritage perspective where uplift is directed to locations with greater capacity for change, sensitive areas are clearly protected, and rezoning controls are strong enough to manage cumulative heritage risk'. The masterplan does <u>not</u> demonstrate these principles.
- The Heritage Assessment does not adequately assess the Paddington HCA relative to the sites proposed for uplift. Overall, the Proposal puts at risk more than 50 years of heritage protection that has made Paddington one of the best-preserved Victorian suburbs in Australia.
- Our concern is that heritage considerations are being subordinated to development considerations. Appendix B of the *Heritage Assessment Report* states, "the consistent low scale development and fine-grained allotment pattern are defining features of the (Paddington) HCA and are to be maintained".
- However, in several cases, the conclusions and recommendations of the *Heritage Assessment Report* have not been reflected in the draft masterplan. For example, in relation to the Trumper Park character area, the report concludes: " "… the key heritage risk in this character area is the effect of substantial uplift on item I499 and on the park-edge interface more broadly. Because Trumper Park functions as an open-space setting and buffer to the Paddington HCA, development at its southern and eastern edges must remain clearly subordinate to the low-scale historic fabric to the north." This area, west of Jersey Road, includes the Paddington Bowling Club site.
- Despite the heritage concerns noted above, the *Explanation of Intended Effect* shows the land in this area (including the site of Item I499) is to be rezoned for high-density residential development, with floor space ratios of 2.3 and 2.5 to 1, and height limits of between 78 and 90 metres (23-29 storeys). It is not as though rezoning of the land in question could be justified on the grounds it is close to transport facilities; in fact, the land is remote from both the proposed Woollahra and Edgecliff stations and some 600m from Oxford Street. Finally, it needs to be remembered that much of the land proposed to be rezoned is presently open space and zoned RE1; the provision of open space in the face of significant increases in population is a particularly sensitive issue. These matters beg the question, why is this land proposed to be rezoned? The case for the density has not been made out. The current zoning of the land in question should stay in place.
- In other cases, very high towers are proposed literally next door to heritage items. An example is just south of the intersection of Glenmore Road and New South Head Road. Heritage items (some low stone and brick cottages) are located on the east side of Glenmore Road. The masterplan presently proposes that the relatively narrow properties immediately to the east (fronting New South Head Road) be rezoned to allow 43.5 and 74.9 metre towers. The size and shape of the sites means there is no room for 'stepping down' of development to the boundary of the heritage sites. The permissible height of development on these sites should be reduced.

- The Society is also concerned about the risk that developers' reluctance or inability to amalgamate sites will lead to a situation where a large number of smaller sites are developed and therefore the risk of greater impacts on contributory heritage items and character.

- **The proposed rezoning of 400 Glenmore Road will have a dramatic adverse impact on the Paddington Heritage Conservation Area and add materially to traffic passing through Paddington:** The Society strongly objects to this aspect of the Proposal, which seeks to increase the height limit on this site from 9.5 metres to 74.2 metres (up to 23 storeys) on a high flood risk site, for a net gain of perhaps 84 dwellings.

  - The *Heritage Assessment Report* contains no specific assessment of the impact of this rezoning on Paddington's heritage. This is a significant weakness in the report, as the area character statement concludes, "Any uplift in the vicinity of Trumper Park ... requires a highly managed and heritage-led response, with careful attention to scale, setbacks, landscape setting, view relationships and cumulative effects over time so that the integrity, legibility and residential character of the Paddington HCA are not eroded."
  - The resulting tower would massively breech and disrupt the skyline from key public viewpoints across Paddington. The tower would cast shadows over much of Trumper Park, reducing its amenity, value and useability (especially in winter). Given the propositions in the TMAP, both construction and operational traffic associated with the development will inevitably be forced through Paddington's fine-grain local street network.

- **The proposal to close the north-south component of New McLean Street and construct a new road between Glenmore Road and Ocean Street is unworkable**: The Transport Management and Accessibility Plan (TMAP) and draft Design Guide show that it is intended to close New McLean Street at its intersection with New South Head Road (although initiative GT2 in the TMAP also states, "Investigate lengthening the right turning lane on New South Head Rd into New McLean St."

  - The Society strongly objects to closing New McLean Street at New South Head Road and replacing it with an ill-conceived, yet-to-be-designed (indeed, potentially undeliverable) road falling some 30 metres from Ocean Street to Glenmore Road. It will almost certainly require acquisition and demolition of several residential and commercial buildings and require the use of driveways to existing apartment blocks. Figure 8.1 in the TMAP shows that it would follow High Street, Great Thorne Street and Arthur Street, all effectively narrow (in some cases, steep) single-lane roadways.
  - It is astonishing that the Government could present such an ill-conceived, ill-defined proposal to service a dramatic increase in density in and around an expanded Edgecliff Centre (a 4-5 times increase in the permissible floor space ratios across these properties is proposed).
  - The TMAP is vague and obtuse about how the road is to be delivered. It <u>appears</u> to be contingent on the staging of private development in the area, notably along New South Head Road, leaving open:
    - questions about what interim arrangements would be required:
      - during the period until the road is completed
      - should a developer of land between the intersections at Glenmore Road and Ocean Street want to proceed before developers at the intersections want to proceed (presumably the 'land-locked' middle sites could not be redeveloped)
    - the possibility that the road is, in effect, never completed.

- If construction of the road is not to be staged, the up-front financing and longer-term funding arrangements will be massively expensive and the associated legal and construction issues associated funding arrangements would be massively expensive. Yet, funding arrangements for delivery of the road are unclear. Developers will resist the use of developer contributions to fund the road and/or are likely to seek offsets against other contributions. Given those constraints, and the substantial cost of the road, it seems Woollahra Council - described in the TMAP as the 'lead agency' – will be expected to fund most if not all of the road's cost. This is unfair on residents and businesses in the Woollahra LGA, as it shifts costs that should (at least partly) be borne by the NSW Government.
- If the road proceeds, traffic at all intersections, especially entering/leaving Glenmore Road and Ocean Street, but also along New South Head Road, will be chaotic. There will be cascading impacts in all directions.

- **Paddington Bowling Club and Trumper Park:** The proposed rezoning of the Bowling Club site from RE1 Public Recreation to allow residential development with a floor space ratio of 2.3:1 and a height of 90.2 metres (up to 29 storeys) cannot be supported.

- ***No RE1-zoned land in Paddington, and no part of Trumper Park, should be lost.***

- **The Proposal fails to provide adequate additional open space, and is inconsistent with *The Sydney Plan*'s open space commitments:** The Proposal fails to ensure adequate additional open space to support the expected growth in population and consequent additional demand on existing open space. Only 3.5 hectares of additional open space is proposed for an additional population of almost 20,000 people.

  - *The Sydney Plan*, released just two months ago, in August 2026, identifies Edgecliff-Woollahra-Paddington as an area of "limited open space access and provision". The obvious consequence of the Proposal is that it will add demand for open space in an area already with constrained supply. The Plan identifies five approaches that will underpin its "Response 7: Grow and connect public open space", the third being, "*Every significant rezoning decision improves access and provides new open space*: precinct scale rezonings are an opportunity to make sure that housing growth is supported by provision of good quality open space, that is accessible to all residents. Policies are needed to make sure that every rezoning decision improves access, and public investment focuses on land acquisition and delivery in areas of greatest need." The provision of barely 3 hectares of open space is manifestly inconsistent with the thrust of the Government's own recently-released Plan. This problem cannot be corrected in the future. The land required for additional open space needs to be identified upfront, zoned RE1 and provision made for progressive acquisition of the land in question.

- **Increased runoff from new development and risk of flooding:** The Society is deeply concerned that additional hard surfaces associated with new development in the Rushcutters Creek catchment will increase runoff towards the low-lying land around Trumper Park. As acknowledged in the *Flooding and Stormwater Report* for the Proposal, "… the existing stormwater drainage network of pits and pipes are undersized, even for more frequent events (such as the 5% AEP [Annual Exceedance Probability])." The report also observed that the 2016 *Paddington Flood Study* found that "… flooding in the locality (near Trumper Park) in excess of 0.5 m in the 20%, 5% and 1% AEP events. In the PMF [Probable Maximum Flood] event, flood depths appear to be in excess of 2m in this area." The study acknowledges the significance of existing overland flows along New South Head Road and

Glenmore Road, and along Arthur Street and New McLean Street prior to discharge into Trumper Park. An indicative floodway for the PMF passes through 400 Glenmore Road. Critically, the report states that the flood management strategy for the Edgecliff-Woollahra precinct should, "…avoid development in the floodway".

- Remarkably, despite the Flood Planning Area forming a key part of the Woollahra LEP 2014, Section 3.2.1 of the *Flooding and Stormwater Report* states: "The flood planning area is not formally defined in the Woollahra LEP." In fact, as shown in the Appendix, the map accompanying the LEP shows Trumper Park and almost all land north-west of the intersection of Glenmore Road and Cascade Street falling within the Flood Planning Area.
- Flooding is a critical issue and cannot be addressed on a DA-by-DA basis; it needs a robust catchment-wide assessment before land in the catchment is rezoned
- Although existing and 'post-development' scenario maps have been presented in the *Flooding and Stormwater Report*, there is little detail about study inputs and modelling, particularly inputs to the 'post-development' scenario, e.g. assumptions about the nature of extent of buildings, deep soil areas, site coverage, what drainage upgrades are included in the modelling. It is especially important to understand these matters, as the report concludes, "an overall improvement to flood immunity throughout the Precinct as well as greatly reduced flood risk in the post-development scenario." Such a strong conclusion demands scrutiny of the analysis.
- All of the stormwater works identified in the *Infrastructure Delivery Plan* are marked as being the responsibility of Woollahra Council and to be funded by the Council and/or developer contributions. The implications of this for Council finances and/or development feasibility is not shown in either the *Infrastructure Delivery Plan* or the *Flooding and Stormwater Report*.
- Clearly, if the Proposal is to proceed, further work is needed. For that work to be credible, Woollahra Council needs to be actively involved from the outset, and the work needs to be independently peer-reviewed.

5. Broader impacts on Edgecliff, Woollahra and Paddington, and other flaws in the Proposal

While many of the Proposal's impacts will be felt most acutely in Edgecliff and Woollahra, the Proposal will also have a number of undesirable broader, indirect impacts on Paddington.

The lives of Paddington residents are closely linked to Woollahra and Edgecliff. Paddington residents enjoy Woollahra's attractions, heritage, public spaces and amenity, and frequently use the shopping, other services and transport facilities at Edgecliff. Similarly, businesses in Paddington interact closely with those in the two contiguous suburbs. Impacts from the Proposal on Woollahra's environment, and on the character of and access to Edgecliff will adversely affect the quality of life of those living in Paddington. In addition, notwithstanding the proposed station, a significant amount of traffic arising from the proposed development in Edgecliff and Woollahra will inevitably pass through Paddington. More generally, the Society is deeply concerned that the Proposal will be accepted as what constitutes 'good planning' and 'set the bar' for future planning proposals that may affect Paddington more directly.

And there are other aspects of the Proposal where, if it proceeds, change is required.

5.1 Cumulative Impacts from development elsewhere in the Woollahra LGA

One of the key flaws in the Proposal is the failure of the various 'supporting studies' to account expressly for the cumulative impacts from development elsewhere in the Woollahra LGA, notably in the Double Bay and Rose Bay areas. These will compound the Proposal's impacts, particularly in relation to transport and certain social infrastructure, especially schools.

At the time of preparing its submission on the Proposal, Woollahra Council identified active State Significant Development (SSD) applications and LMR applications accounting for more than 900 dwellings across the Woollahra LGA, as well as a development of more than 400 dwellings at Rose Bay that had been declared State Significant through the Housing Delivery Authority pathway.

Council's housing-delivery data also identified, at the time it was compiled:

- 896 gross new dwellings already approved but not yet completed across the LGA, including complying development and SSDs; and
- a further 1,238 potential gross dwellings in SSD applications under assessment.

The Society acknowledges these figures may overlap in part (at least in part) with the 900+ figure mentioned above.

Separately, Council's assessment identified substantial theoretical LMR capacity. Around the Edgecliff/Woollahra rezoning precinct alone, but outside its boundary, approximately 885 LMR-affected sites were estimated to have capacity for about 2,900 additional net dwellings.

Council's broader cumulative-impact assessment estimated capacity for more than 6,000 additional dwellings through alternative planning pathways outside but directly adjoining the rezoning precinct, including Double Bay, Rose Bay and Bondi Junction. Cumulative impacts are not acknowledged or addressed in the Proposal.

5.2 Transport

The *TMAP* is a disappointing document; it is high-level and opaque. It fails to present a compelling case for the recommended suite of initiatives aimed at meeting prospective transport demand. The Society's overall comments on transport issues associated with the Proposal are set out below:

- **Woollahra Railway station** The Society remains to be convinced that the proposed Woollahra Station is necessary. Much of Woollahra and Edgecliff is already located only a short walk from Edgecliff and Bondi Junction stations:

    - although the station is presented as the cornerstone of the entire Proposal, it is unfunded and uncommitted
    - the Society is concerned that the rezoning may occur without the station, or that the station could be deferred for some time. Rezoning around the station should not proceed until: (a) further details of the station precinct have been developed (Edgecliff Road cannot plausibly provide the vehicle and pedestrian access demanded by the station) and exhibited for public comment; and (b) the station is fully-funded in the State Budget.
    - even if the Station is built, we maintain that, as a 'local centre' (mentioned many times in the documents forming the Proposal), development around it should be of a much lesser scale that at Edgecliff and Bondi Junction, which are 'hub' locations.

- **Serious weaknesses in addressing demands on the road network for vehicles, public transport, cyclists and pedestrians**: Road space in the precinct and nearby areas is effectively a finite resource. Unfortunately, the TMAP seriously understates the complexities and trade-offs in dealing with road-based transport. This shortcoming is best exemplified by the range of initiatives proposed for the roads and streets around Edgecliff. The TMAP:

    - acknowledges the intersection at New South Head Road, Ocean Street and Ocean Avenue is already at or near capacity but fails to explain how the intersection might handle the additional traffic from development in the precinct, development east of the precinct and at Bondi Junction
    - proposes investigating the removal of right-hand turn movements from Darling Point Road into New South Head Road, without explaining how that traffic might otherwise gain access to New South Head Road
    - proposes investigating implementation of a 'double right' turn from Mona Road into New South Head Road to improve the intersection performance, presumably as an alternative (at least partially) for current movements from Darling Point Road
    - proposes investigating lengthening the right-turning lane for eastbound traffic from New South Head Road into New McLean Street, even though other parts of the TMAP and other Proposal documents suggest the northern part of New McLean Street would be pedestrianised
    - proposes investigating the provision for bus priority measures along New South Head Road where possible, such as bus lanes, bus jumps and signal priority
    - proposes installing a separated cycleway along New South Head Road where feasible through ground floor setbacks (retaining the existing carriageway), and a shared path otherwise.

    There may (or may not) be sound reasons for some of these propositions, particularly those aimed at improving public transport services and cycling. However:

    - the package of initiatives for this critical location is clearly under-developed. The package provides no confidence that a workable solution to this area's transport challenges been developed
    - interaction between the elements and how it all fits in
    - no ideas of what happens if the various proposals for further investigation 'do not work', e.g. what is the alternative, cascading impacts, costs, environmental impacts, staging, etc.

    Similar conclusions can be drawn in relation to the cluster of intersections west of Bondi Junction: Oxford Street, Syd Einfeld Drive, Ocean Street and York Road.

- **The Society supports the proposed maximum rates of parking provision.** They should be set as a development standard, making them more difficult to vary at the development application stage. The Society notes section 7.3 of the *Sydney Local Environmental Plan 2012* sets parking rates as a development standard.

5.3 Housing

- **It is unclear just how many dwellings are expected to be delivered by the Proposal and over what number of years.** The Proposal is ostensibly aimed at increasing the number of dwellings in Woollahra and Edgecliff. However, it does not state how many existing dwellings would be demolished or specify the net increase in dwelling numbers that would be delivered. It appears around 2,500 dwellings will be lost. Rezoning assumes a large number of site amalgamations, which is speculative. Sites could be amalgamated and cleared, with no guarantee that replacement buildings are ever built.

- **In fact, there is a risk of a net loss of dwellings:** There must be some doubt as to whether the Proposal's housing outcomes are deliverable. Sites could be amalgamated and cleared, with no guarantee that replacement buildings are built, e.g. as a result of changing economic and financial circumstances.

- **The provisions aimed at addressing housing affordability - both in relation to the provision of 'affordable housing' as defined and the provision of market housing' - need to be more substantial and effective**. One of the key concerns for many people, not just in Paddington, is that dwellings in the new developments will be unaffordable, including for 'key workers such as teachers, those working in hospitals and emergency services. The Society is concerned that new units in the precinct will be marketed to high-income earners or those with wealth, as we have now seen with the marketing for the recently approved 160 Oxford Street, Paddington. As a result, dwellings will be sized in response to that market, as seen in multiple SSD developments in Sydney's east.

- **The requirements for the provision of affordable housing need to be increased. In several ways, the proposed affordable housing provisions are do not meet the scale of the affordability challenge.** The Proposal has a 'base' requirement for affordable housing of 3% of residential floor space and between 4% and 15% of floor space for sites within 200-250 m around the proposed Woollahra station and Edgecliff station. These percentages are too low to have any meaningful impact on the supply of affordable housing. The base requirement should be increased to 5% of floorspace, and the ceiling for high rates should be raised to 20%. In addition, the Society believes:

    - the affordable housing requirement should be satisfied via in-kind contributions, as this will provide affordable housing more immediately and avoid potential delivery problems in acquiring and developing properties for purpose-built affordable housing
    - contributions should be provided in the precinct or, failing that, the LGA. We need vibrant, diverse communities in Eastern Sydney.
    - community housing providers must set affordable housing rents to less than 30% of the occupants' household income
    - if cash contributions are maintained, contributions should <u>not</u> be transferred to Homes NSW, as is being contemplated by the NSW Government.

    That said, it is pleasing to see that affordable housing, as defined in the Proposal, would have to be provided in perpetuity. This is a welcome change to the, frankly, 'temporary' affordable housing arrangements in *State Environmental Planning Policy (Housing) 2021*, which enables affordable housing associated with a development to be sold after 15 years.

- **The mix of dwelling sizes in developments in the precinct needs to place more emphasis on smaller dwellings**: Affordable housing, as defined, will address only a modest part of the housing challenge facing Sydney-siders, particularly those living in Sydney's eastern suburbs. While the Society recognises there is a need for three-bedroom units in the LGA and eastern Sydney more generally, there is a strong case for increasing the proportion of studio, one-bedroom and two bedroom units for residential developments in the precinct.

- Recent development proposals are increasingly including 'mega-units' with 300m^2+ of floorspace. In effect, substantial development rights are being created by governments and used by developers to supply housing for an extremely small fraction of society. Given the impacts of the Proposal on the amenity of the precinct, and on public infrastructure, it is reasonable to question whether this is appropriate. While some will argue 'the market'

should determine what type and size of units are developed in the precinct, governments have long used land use planning controls to achieve broader public policy outcomes. The Society believes the Government should consider applying a maximum dwelling size control. This will increase the supply of housing available within given floor space ration and height standards, and offer a more balanced mix of housing that meets social needs.

5.4 Draft Design Guide

- **The draft *Design* Guide is highly problematic; it 'does not meet the pub test':** We object to the Design Guide because it is founded on the premise that the densities being proposed are acceptable. They are not. The gap between the visual analysis objectives and the prospective densities is so large that it cannot plausibly be closed. The Guide is implicitly aimed at legitimising what is an unacceptable impact on the area.

    - The Guide makes statements that seem unachievable when compared to the reality of the height and FSR Maps and the Visual Impact Assessment. For example, the Design Guide has key objectives of 'strengthening local centres and neighbourhood character' while fundamentally destroying many neighbourhoods and street amenity with dense towers, and 'enhancing - landscape, heritage and cultural identity' while removing a lot of landscape and promoting towers at sensitive heritage interfaces and even within the HCA (400 Glenmore Rd). 'A Design Guide should provide detailed building envelopes for each site, to ensure a good response to each site's constraints.
    - Figure 23 of the Design Guide proposes a zero setback along Glenmore Road from New South Head Road to approximately 50m south of the Eastern Suburbs Railway viaduct and to allow a 29-storey tower on the site immediately south of the viaduct. We object to this proposal. It will have a dramatic impact on Trumper Park and breech the skyline for residents in Paddington. It would be wholly out of character with the low-scale, older dwellings immediately west of Glenmore Road.
    - The towers proposed for the Edgecliff-Woollahra ridge line and the southern edge of the 'Edgecliff Character Area' – mostly 28-34 storeys, with some around New McLean Street at 13-17 storeys – will place much of Trumper Park in shadow for significant parts of the day, especially during the middle of each year.
    - These same towers will present as a visually intrusive wall from many viewpoints around Trumper Park, from across the Rushcutters Creek valley and along the Edgecliff-Woollahra ridge line. The number and height of the towers should be reduced, and spacing of the towers needs to be reduced.

5.5 Tree canopy and other environmental concerns

- The Proposal presents a range of environmental challenges:

    - The Society objects to the loss of tree canopy on private properties and in public spaces that will result from the Proposal. In the great majority of cases, these trees have been in place for decades. Even if the 'deep soil' controls are implemented fully (and experience with other development across Sydney suggests they will more than likely be pared back at the DA stage), those mature trees will take decades to replace. Some of the transport initiatives, e.g. the cycleways in Ocean Street, may also lead to the loss of trees in the public domain.
    - It is essential that any rezoning and the assessment of development applications be administered to minimise the threats to biodiversity

- The number of towers proposed for the precinct, some up to 34 storeys, will create wind tunnel effects and reduce pedestrian comfort and safety at street level, particularly around stations, parks and on steep streets. These impacts should be resolved in the planning controls, not left to individual developments.

5.6 Governance and Transparent Reporting on Implementation

- Disappointingly, there is no mention in any of the published documents of some form of over-arching governance arrangement, involving relevant state agencies, utilities and Woollahra Municipal Council to oversee finalisation of the Proposal and its implementation. The Urban Development Program mentioned in the *Explanation of Intended Effect* is insufficient; it concentrates on matters at a state level. In any event, despite the reference to councils in the relevant section of the Explanation, it appears that councils have little effective say on the Program. Similarly, the *Infrastructure Delivery Plan* includes no more than a vague statement, "Key next steps include … periodic review, monitoring and reporting on infrastructure funding, delivery and any changing infrastructure needs".

- If the Proposal is to proceed, then precinct-specific arrangements, with published terms of reference, must be established no later than early 2027.

- Nor is there any mention of public reporting on implementation of the Proposal, including a credible *Infrastructure Delivery Plan*. The governance arrangements mentioned above need to provide for at least annual reporting on progress, and not at some aggregated whole-of-precinct level, but at a detailed, itemised level where progress with specific initiatives can be tracked.

- Implementation of the Proposal involves more than just progress with the supporting infrastructure; it also concerns application of the development controls – for example, standards for building and floor space ratios, and deep-soil planting – to establish whether the aspirations and more specific objectives for the precinct are being realised and, if not, what may need to change. Given the community's deep concerns about amenity, streetscape, heritage and the character of the area, reporting on these aspects of the Proposal is essential.

5.7 Other Matters

- **Greenhouse gas (GHG) emissions associated with the Proposal have not been assessed**: Remarkably, given the *Climate Change (Net Zero Future) Act 2023* and given the replacement of around 2,500 dwellings with 9,400 additional dwellings, there has been no assessment of the GHG emissions associated with the Proposal. Even with rising use of electric and hybrid vehicles and increases in the use of renewable energy, embodied emissions associated with the demolition and redevelopment of existing housing may well represent a net increase in emissions from the area.

- **The Society is concerned that the development standards arising from the rezoning will simply be a starting point for developers to push for even further development potential:** This will be a particular risk as the housing market changes and as development feasibilities change. Experience with the Government's Low and Mid-Rise housing controls – for example, the development at 160 Oxford Street, Paddington recently approved by the Department, and elsewhere - shows that developers:

- frequently apply for variations to those controls, using the provisions of clause 4.6 of the Woollahra LEP
- not infrequently attempt to modify a development consent

Given the scale of development permitted under the Proposal, the use of such provisions would only add to the development's impacts on local areas.

6. Conclusion and future courses of action available to the Government

The Paddington Society supports well-researched, properly-planned growth that respects Paddington Edgecliff and Woollahra's heritage, landscape and community, and is supported by funded infrastructure. But the Proposal in its current form is not that. It is too large, too rushed, too uncertain, and, if adopted, will cause lasting harm to Edgecliff-Woollahra, Paddington and the wider Woollahra LGA.

The Paddington Society therefore strenuously objects to the current Proposal.

From here, we see three possible courses of action open to the Government.

Our much-preferred path, Course of Action A, is not to build the station and not proceed with the rezoning proposal. Course of Action B asks that any rezoning of the Edgecliff-Woollahra area be deferred until further, more detailed investigations have been completed and until there has been proper community engagement. Course of Action C assumes that the Government and the Department are determined to proceed with the rezoning broadly in line with the *Explanation of Intended Effect* and broadly to the timetable set out in that document, i.e. by end of 2027.

The Society urges the Government not to pursue Course of Action C. The results for the people of Edgecliff, Woollahra and Paddington, indeed all residents of the Woollahra LGA, will be devastating. We ask the Government to consider whether the standard set by this Proposal really is the one against which future planning for Sydney is to be judged. Is this really the legacy for which the Government wants to be remembered?

COURSE OF ACTION 'A" – DON'T BUILD THE STATION AND DO NOT PROCEED WITH THE CURRENT PLANNING PROPOSAL

This course of action recognises:

1. Edgecliff, Woollahra and Paddington are already among the densest areas in Sydney and will remain so over the next 20 years
2. other developments already approved or expected in the Woollahra LGA - notably SSD and Low-Mid Rise development in Paddington, Edgecliff, Darling Point, Double Bay and Rose Bay – mean

the LGA will more than meet a sustainable share of new dwelling construction over the next 20 years

3. the fact Edgecliff and Bondi Junction stations are already close to the Edgecliff-Woollahra precinct and travel time savings (and therefore mode shift to public transport) is unlikely to be significant
4. there is substantial scepticism about whether the Government's claims and projections of additional housing arising from the rezoning can be realised
5. in any event, development across Sydney needs to be sequenced so that the NSW Government can fund the timely provision of supporting infrastructure in:
    a. greenfield areas of Sydney that are already struggling to see timely delivery of critical transport, education and social infrastructure
    b. other established parts of Sydney (but with existing densities lower than in Paddington, Edgecliff and Woollahra) that have also been identified for redevelopment
6. the NSW Government and Woollahra Council do not have, and will not have, the capital works funds (even with developer contributions) to deliver the present infrastructure package, much less:
    a. what would be required to meet the real costs of the package (i.e. addressing the absence of any serious effort to scope the proposed initiatives in the *Infrastructure Delivery Plan*, the inclusion of land acquisition costs, and probable optimism bias in the current costings; or
    b. the even greater costs of a package that more honestly addresses the infrastructure required as a consequence of the proposed rezoning.
7. the Proposal's impact on Woollahra Municipal Council's finances, and the Council's ability to provide infrastructure for other parts of the LGA where denser development is already happening
8. the risk that uncertainty about the feasibility of development will:
    a. lead to pressure to add additional development rights, e.g. variations under clause 4.6 of the Woollahra LEP
    b. create uncertainty about the funding and, consequentially, delays in the staging of critical infrastructure.

COURSE OF ACTION 'B' – IF THE GOVERNMENT INTENDS PROCEEDING WITH THE STATION AND INCREASED DENSITIES, BUT ACKNOWLEDGES THE WIDESPREAD WEAKNESSES IN THE CURRENT PROPOSAL, AS IDENTIFIED BY WOOLLAHRA COUNCIL, COMMUNITY GROUPS AND INDIVIDUALS

The NSW Government should commit immediately (and, in any event, ahead of the March 2027 state election) to:

1. not proceeding with <u>any</u> rezoning of Edgecliff and Woollahra until:
    a. the extensive weaknesses in the current Proposal have been addressed, in line with investigations mentioned in point 2 below, and the Proposal has been substantially modified.
    b. the infrastructure required by that revised proposal, notably the proposed railway station and vehicle and pedestrian access in Edgecliff-Woollahra, is fully funded in the NSW State Budget.

2. directing the Department of Planning, Housing and Infrastructure and other relevant agencies, notably Transport for NSW, to prepare an amended draft proposal for Edgecliff-Woollahra. The amended draft proposal needs to incorporate and reflect the

findings from the following investigations and other actions (even if they reduce additional dwelling yields):

a. establish governance arrangements for the investigations that provide for close, open engagement with Woollahra Municipal Council
b. prepare and publish (at an early date) a detailed, comprehensive response to:
    i. Woollahra Council's submission and its 'Alternative Approach'
    ii. public submissions on the Proposal made during the current consultation period
c. provide for far greater community input than has been evident during development of the current Proposal
d. assess the cumulative impacts of dwelling and population projections arising from all active SSD and LMR developments lodged or 'in the pipeline' or approved to date, both in Woollahra and the Waverley LGA
e. reconcile inconsistencies in relation to projected population and dwelling numbers in the various studies forming part of the Proposal and other Government documents, notably *The Sydney Plan*
f. incorporate the results of the 2026 Census into the analysis of population growth and dwelling demand
g. publish the number of existing dwellings to be demolished under the revised proposal, the net increase in dwelling numbers and the likely displacement of renters, together with details of the methodology used in arriving at the estimated number and timing of dwellings anticipated under the revised proposal
h. ensure the results of the assessment and other investigations at 2(d) – 2(g) are:
    i. used in the updated investigations of associated demand for infrastructure and other services
    ii. published alongside the updated investigations
i. in light of comments on the various infrastructure and other studies underpinning the current Proposal, in each case, complete more detailed investigations, subject them to independent peer review and exhibit the studies for public comment, particularly:
    i. provide thorough analysis of transport and road network constraints around the gateway suburbs of Paddington and Edgecliff-Darling Point, and options to address those constraints in light of projected dwelling demand and confirmation that all have been thoroughly and publicly examined, and that the resultant option to address those constraints has been fully-funded in the NSW budget (notionally by 2030) to enable the resulting infrastructure works to be completed (notionally no later than 2034).
    ii. updated flood and stormwater analysis, undertaken in conjunction with Woollahra Council
j. prepare more detailed assessments of the capacity and levels of service being offered by all infrastructure networks and facilities - flood risk, transport (especially road-based transport), education, community, health and utilities – both existing and under various demand scenarios
k. prepare an assessment of land required for necessary infrastructure and the cost of acquisition
l. prepare more detailed cost estimates of the various infrastructure initiatives
m. develop a scenario-based, itemised, sequenced and funded infrastructure delivery plan, linked to anticipated rates of development and infrastructure service levels, and setting out:
    i. plausible project lead times for investigations, environmental assessment, procurement and construction
    ii. inter-dependencies between projects
    iii. project costings, including anticipated costs of land acquisition

iv. identify land that might need to be protected and acquired to provide scope for development of specified infrastructure in the future

n. develop a statutory mechanism that defers rezoning until infrastructure and other obligations associated with the additional development capacity are funded and programmed, i.e. a mechanism that allows rezoning of land to be 'switched on' or activated at the appropriate time

o. develop draft 'envelope controls' to be applied to development proposed for Edgecliff and Woollahra, e.g. as in Helsinki, and associated envelope approval and façade approval processes

p. completes an assessment of the greenhouse gas implications of the Proposal

q. maintains the 'in perpetuity' requirement on affordable housing developed in conjunction with new development arising from the Proposal, while:
   i. increasing the base rate of floorspace to be provided as affordable housing from 3% to 5%
   ii. increasing the required minimum floor space to be developed as affordable housing on sites close to the stations from 15% to 20%
   iii. expanding the areas within the precinct where a 'higher than base rate' amount of floor space is required to be provided, generally to within 400m from the stations
   iv. requiring affordable housing to be provided in-kind rather than as a cash contribution
   v. requiring affordable housing to be provided <u>within</u> the Woollahra LGA

r. complete a heritage impact assessment of the Proposal on the Paddington HCA, consult with the Heritage Council of NSW during preparation of the assessment, and publish the Council's views on the assessment

s. work with Woollahra Municipal Council on a place-based approach that responds to topography, heritage, tree canopy and infrastructure capacity

3. **re-exhibiting for public comment**:
   a. a revised proposal that incorporates the findings from the investigations identified in point 2 above
   b. the documents referred to in point 2 above.

4. **Proceed with a final proposal following consultation in point 3 above** and, at the same time, publish a detailed response to submissions on the draft proposal.

COURSE OF ACTION 'C' – IF THE GOVERNMENT CHOOSES TO PROCEED WITH THE STATION AND (MORE OR LESS) THE CURRENT PROPOSAL, DESPITE ITS OBVIOUS WEAKNESSES AND IMPACTS

If the Government determines to proceed with rezoning Edgecliff and Woollahra in line with the timetable and process set out in the *Explanation of Intended Effect* (i.e. no further consultation and finalisation of a rezoning by late 2027):

1 the Government commits to fully-funding construction of the station in the NSW Government's 2027-28 budget (i.e. prior to rezoning)

2 the Department of Planning, Housing and Infrastructure, in recommending any rezoning and other actions for Edgecliff and Woollahra, incorporates the following changes to the exhibited Proposal:
   a. excludes all of the Paddington Heritage Conservation Area, including Trumper Park and the Rushcutters Creek valley, from the precinct, and permit no increase in height within or at the edge of the Paddington HCA that would break the skyline from Paddington's public viewpoints

b. in particular, excludes any rezoning of the land at 400 Glenmore Road and retain the site's existing R3 zoning and 9.5 metre height limit
c. maintains the existing RE1 Public Recreation zoning over the site of the Paddington Bowling Club, and does not permit any other encroachment on Trumper Park
d. abandons the proposed closure of New McLean Street and the new road connection to Glenmore Road and find an alternative means of addressing the substantial road and intersection capacity constraints along New South Head Road between Manning Road, Double Bay and New Beach Road, Edgecliff
e. includes safeguards in the Woollahra LEP that prevent the demolition of existing dwellings until binding finance and construction contracts for delivery of the replacement buildings are secured
f. incorporates the affordable housing requirements described in item 2(q) of Course of Action B
g. ensures that the rates of required vehicle parking set out in Table 4 of the *Edgecliff-Woollahra Precinct draft Design Guide* are established as development standards in the Woollahra LEP
h. incorporates provisions in the Woollahra LEP in collaborative consultation with Council:
    i. such that development standards, especially those relating to height limits, floor space ratios and the provision of parking, cannot be varied by an application made under clause 4.6 of the LEP
    ii. allows for more detailed specification of the circumstances in which applications made under Clause 4.55 of the *Environmental Planning and Assessment Act* to modify consents for development in the Edgecliff-Woollahra precinct will be entertained and considered.

The Society would welcome the opportunity to meet with Departmental representatives to discuss this submission.

Yours sincerely,



Esther Hayter
President
The Paddington Society
M: 0411 109 770
E: president@paddingtonsociety.org.au

Appendices – Additional details supporting the submission

Order of the appendices

The appendices are arranged as follows:

A1 – Paddington and Edgecliff-Woollahra in context

A2 – Consultation on the Proposal

A3 – Paddington should not be considered part of Edgecliff-Woollahra

A4 – Housing

A5 – Flooding and drainage

A6 – Transport

A7 – Visual and amenity Impacts

A8 – Social infrastructure

A9 – Water, energy and telecommunications

A10 – Tree canopy and biodioversity

A11 – Delivery, budgets and sequencing

A1 - Paddington and Edgecliff-Woollahra in context

At 4,505 persons per km^2 in 2025, Woollahra is already the seventh most densely populated local government area in Sydney.[1]

Analysis of the Australian Bureau of Statistics' Estimated Resident Population (ERP) data for June 2025 bears out this point. It shows:

- that part of the Bureau's Paddington Statistical Area 2 (SA2)[2] within the Woollahra LGA, i.e. north of Oxford Street, has a density of almost 8,900 persons per km^2 (demonstrating that the Paddington Heritage Conservation Area achieves a high residential density through its terraces and townhouses, i.e. without high-rise buildings)
- the Double Bay-Darling Point SA2 (which includes Edgecliff) had a density of 6,175 persons per km^2; and
- the Woollahra SA2 had a density of 5,821 persons per km^2,

making them respectively the 20th, 43rd and 55th densest such areas (out of 373) in the Sydney region.

The Society has undertaken detailed analysis of 2021 Census data for SA1 areas in each of the three SA2 areas mentioned above. At the 2021 Census, it appears there were:

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1 The others are: Sydney (9,064), Waverley (7,844), North Sydney (7,026), Burwood (6,162), Inner West (5,485) and Canada Bay (4,668).

2 ABS Census data, and other inter-Censal data, is published using a structured 'statistical geography'. The term 'SA2 ' (Statistical Area level 2) refers to a locality, generally containing between 3,000 and 25,000 people, but with an average of about 10,000 people. The boundaries of SA2s may align with local government boundaries, but not necessarily. The Woollahra LGA covers five SA2s, one of which (Paddington) also covers land south of Oxford St that forms part of the City of Sydney LGA. SA1s generally contain between 200 and 800 people, with an average of roughly 400 people.

- 5,214 dwellings in the 'Woollahra LGA' part of the Paddington SA2, of which something less than 100 are in the Edgecliff-Woollahra study area
- 5,688 dwellings in the Double Bay – Darling Point SA2, of which (it appears) approximately 1,000 - 1,500 dwellings are within the study area
- 3,640 dwellings in the Woollahra SA2, of which approximately 2,500 - 3,000 dwellings are located in the study area.

Over the four years between 2021 (the Census year) and 2025, the estimated resident population of all three SA2 areas grew: Paddington (763 persons or 5.1%); Double Bay-Darling Point (165 persons or 1.6%) and Woollahra (292 persons or 3.9%).[3]

A2 – Consultation on the Proposal

Even with the extension to the consultation period, flaws in the process of developing the Proposal have denied the community the opportunity to fully understand, assess and respond to the Proposal. There simply has not been enough rigorous analysis presented for the community to review.

Compounding the weak consultation processes to date, Section 5 of the *Explanation of Intended Effect* makes it clear that the Government does not propose any further consultation on the Proposal. Given the scale of the proposed development, the limited analysis to date and the Proposal's manifest shortcomings, that is an unacceptable approach to urban planning. There must be a further round of consultation - underpinned by substantive analysis and credible responses to public submissions - before steps are taken to present an updated rezoning proposal to the Minister for Planning and Public Spaces.

The Society asks the Government to commit to re-exhibiting a revised Proposal once the information gaps have been filled. These are not matters that can simply be resolved at the development application stage, once the zoning and height controls are already in place.

The problem is far deeper than just the constraints on public consultation to date; just as importantly, there hasn't been time for state agencies to analyse the government's own proposal properly. From a public announcement about a new station to supposedly well-considered plans for up to 10,000 dwellings in barely twelve months is not enough time to analyse the issues in sufficient depth. The Proposal and associated reports bear out that conclusion. Compare the time taken to prepare equivalent land use and infrastructure plans in Sydney's greenfield areas, i.e. where integrated planning is probably less complicated (in many ways) than planning to retrofit both major development and substantial infrastructure into established, already high density, suburbs.

A3 - Paddington should not be considered part of Edgecliff-Woollahra

Trumper Park is in Paddington, not Edgecliff. It lies in the Paddington catchment of Rushcutters Creek, and its primary public access is from Glenmore Road and from Hampden, Roylston, Cecil and Harris Streets in Paddington. It serves the whole of the Paddington community.

By contrast, Trumper Park has only one public access point from Edgecliff (Bowes Avenue) and one from Woollahra (Quarry Street). The only other link, from New McLean Street to Edgecliff Station, is a right of footway easement over private strata land at 4 and 8-10 New McLean Street, which Council is not responsible for maintaining. There is no planning basis for treating this part of Paddington as part of a station precinct.

[3] Figures drawn from ABS 2025 ERP data. Estimates of dwelling numbers for inter-Censal years are not published by the ABS.

A4 - Housing

At the heart of the problems with the Proposal lies a lack of clarity about the current number of dwellings and population in the precinct (and the Woollahra LGA as a whole) and the prospective number of dwellings and population in those areas. The *Explanation of Intended Effect* refers to "approximately 9,400 new homes" but fails to make clear whether these are in addition to the current housing stock or inclusive of any existing stock that needs to be demolished (in that case number of the homes is 'new' only in the sense that they are newly built. The Proposal suggests the population of Edgecliff-Woollahra could grow by 19,740 people, although, again, there is no clarity as to whether this is a gross or net figure.

The projected population growth set out in the Proposal is inconsistent with the projections underpinning *The Sydney Plan (TSP)*. The TSP, published in August 2026 (i.e. some 12 months after the Government's announcement to develop the station and increase densities across Edgecliff-Woollahra and only one month before release of the Proposal), suggests that the population of the whole of the Woollahra LGA would increase by 2,050 people between 2026 and 2046, i.e. even with apparently):

- population growth arising from the Proposal (which is expressly referred to in the TSP)
- other SSD and LMR developments in the LGA.

The *Economic Impact Assessment* refers to 9,600 dwellings of capacity created by the Proposal but a much lower likely delivery of around 4,800 dwellings by 2046. At an occupancy rate of 2.1 persons per dwelling, an additional 4,800 dwellings by 2046 would yield an additional population of 10,080 persons in the precinct. Even if the 4,800 figure is treated as an estimate of net dwellings, the population of the precinct alone would increase by around 7,400 persons,[4] more than three times the projected population growth for the entire LGA in the TSP. Something doesn't add up.

To compound the confusion the *Transport Management and Accessibility Plan* accompanying the Proposal is based on 2026 – 2046 projections utilising the Government's *Common Planning Assumptions* prepared in 2024.

This is <u>not</u> the way to undertake strategic planning.

These inconsistencies need to be explained. The Department should explain how the scale of the Proposal relates to the Woollahra LGA's share of projected metropolitan housing growth in The Sydney Plan, and why this precinct has been asked to accommodate so much of it. The Society is concerned that *The Sydney Plan* projections could be used to justify an unrealistically small share of the NSW Government's infrastructure budgets, and be used to criticise the local community as NIMBYs.

A4.1 Housing affordability

Supply is not affordability. New high-rise apartments in Edgecliff, Woollahra and Paddington, many with harbour views, will be sold at the premium end of the market. Increasing supply in these locations will do little for housing affordability generally.

If 2,500 existing dwellings are demolished in the process of constructing the new residential towers, around 5,250 people would need to relocate (at an assumed occupancy rate of 2.1 persons per dwelling). If a third were renters, about 1,750 renters would be displaced.

A base rate for affordable housing of 3% of floorspace, rising to 4-15% on a fairly limited part of the precinct is a limited response to the need for affordable housing. The Proposal must show: how affordable housing will be secured in perpetuity; how it will be managed by a registered community

[4] Calculated on the assumption that 2,500 of the total 9,400 dwellings projected for the precinct would be need to be demolished.

housing provider; and how it will be delivered locally rather than through contributions spent elsewhere.

The Proposal anticipates a mix of dwelling sizes. The case for the proposed percentage for each dwelling type has not been made out. Moreover, the requirements apply only to development within 200m of Edgecliff, Bondi Junction and the proposed Woollahra railway stations. In addition, the controls are intended to be applied though a Development Control Plan. If the Proposal proceeds:

- the desired housing mix is more likely to be secured if the percentages are to be applied as a development standard in the statutory planning controls rather than through the DCP
- given the delivery of affordable housing is one of the stated objectives of the Proposal, consideration should be given to requiring a larger share of studio and 1-bedroom units. Reliance on an uncommitted amount of social housing alone will not address the need for a greater supply of affordable housing.

The Society is seriously concerned that the rezoning, if approved, could result in a net loss of homes rather than a gain. Once the new controls are in place, developers can be expected to acquire and amalgamate sites to take advantage of the increased heights and floor space. Many of those developers may not be able to finance the construction of the buildings the Proposal envisages, particularly for high-rise towers with complex basements on steep or flood-affected land, and particularly if market conditions or construction costs change.

There is nothing in the Proposal to stop existing buildings being demolished before finance for their replacement has been secured, and no guarantee that replacement buildings will ever be constructed. Sound existing flats and houses, many of them among the more affordable rental homes in the area, could be cleared and the sites left vacant for years. Across a precinct of this size, this could result in a massive net loss of dwellings and the displacement of existing residents, the very opposite of what the Proposal is intended to achieve.

The Society asks that any rezoning include safeguards so that existing dwellings cannot be demolished until a development consent has been granted, construction finance has been secured and construction of the replacement building is ready to commence.

A5 - Flooding and drainage

Section 3.1.1 of the *Explanation of Intended Effect* states that the proposed built form has been informed by the *Flooding and Stormwater Report*, "including limiting development within flood-prone areas", and that future development will need to comply with clause 5.21 of the Woollahra LEP and the Woollahra DCP 2015".

That statement cannot be reconciled with:

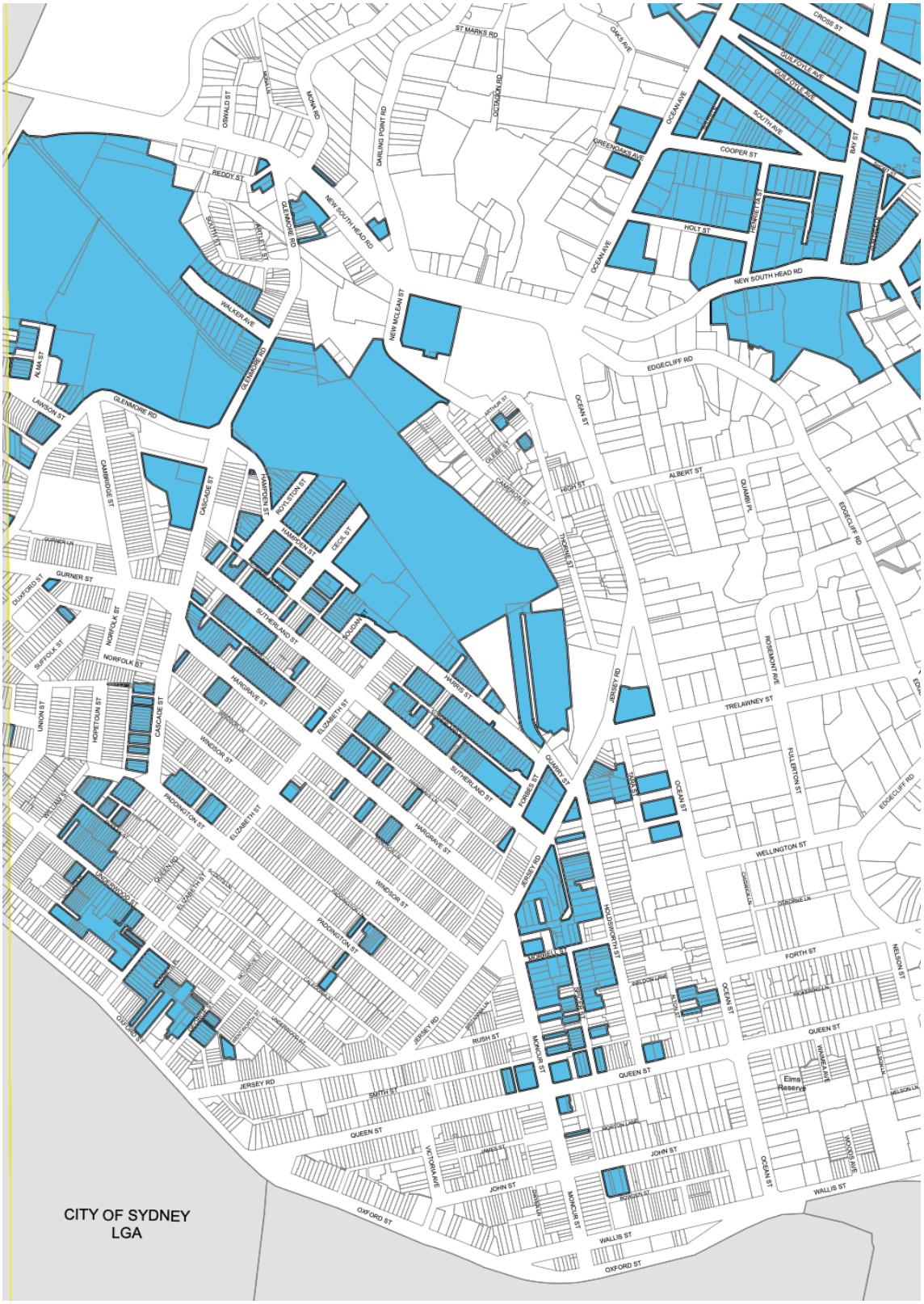
- the proposed rezoning of 400 Glenmore Road, a high flood risk site on the floor of the Rushcutters Creek valley, or
- the increased development in the Trumper Park catchment, which already has significant flood risks.

Figure A-1 is an extract from the relevant section of the Woollahra LEP's *Flood Planning Map*. It clearly shows the flood zones in the catchment areas of Paddington and to the east, including:

- 400 Glenmore Rd / the adjacent Hakoah and Sydney Grammar sites to its west & those opposite to south
- all the small Victorian terraces to its north and beyond in this catchment – i.e. those fronting both sides of Walker Ave.

- Trumper Park / the oval / the SSD site at 8-10 New McLean St site to north of the park / the Edgecliff Centre corner site (proposed by DPHI for redevelopment) / the Glenmore Rd New South Head Rd corner sites (the narrow entry/exit proposed for the new road and its junction.
- the Paddington Bowling Green site
- others along Jersey Road / Ocean Street.

Figure A-1 – Extract from the Flood Planning Map Sheet FLD 003 in the Woollahra LEP



Source: Woollahra Council

Owners and residents in these flood zones are extremely familiar with on-going flooding problems, already exacerbated by ever-increasing loss of deep soil, basement excavations, diverting groundwaters to adjacent and down-stream sites, ageing and insufficient stormwater drainage infrastructure, degraded sandstone etc.

Development arising from the Proposal will increase the amount of hard surfaces, deep basements and so on, increasing runoff and flood risk for Paddington properties downstream. Deferring flood risk to the development application stage is not acceptable: land that is subject to high flood risk should not be up-zoned in the first place.

A6 - Transport

As a dense urban area, moving around and through the Edgecliff-Woollahra precinct is often already a challenging experience. The additional travel demand generated by the proposed rezoning will add to those challenges, notwithstanding (and to some extent due to) the presence of the new station.

A6.1 Current travel patterns

Regrettably, the TMAP provides fairly limited information on existing travel patterns, and still less on prospective travel patterns under the Proposal. The community therefore has no reasonable means of independently assessing the transport implications of the Proposal. Questions exist around:

- the mode split for trip purposes other than the journey-to-work
- the accuracy of the bus occupancy data used in the TMAP (e.g. 31-45% on route 389 buses between 8:00 and 9:00am at The Fiveways intersection, Paddington). This does not align at all with user experience
- How is the Public Transport Accessibility Level (p.51) calculated? What are the units of measurement? Why hasn't the TMAP provided both 'before and after the station' maps?
- What did the 2023 *Edgecliff Commercial Centre Transport Study* show was the expected intersection performance after the proposed development, and what did it propose to keep the Level of Service no worse (or better) than at present?
- Calibration and use of the four-colour "fast" to "slow" range in Figure 3.36 of the TMAP. Is it some percentage of the sign-posted speed? It is unclear why equivalent diagrams for the weekday PM peak and weekends was not included.
- What did the 'enquiry by design process' (p.59) involve?
- Why weren't the results from the scenario testing provided, instead the TMAP is just presenting qualitative results ('just trust us') for their preferred solution?

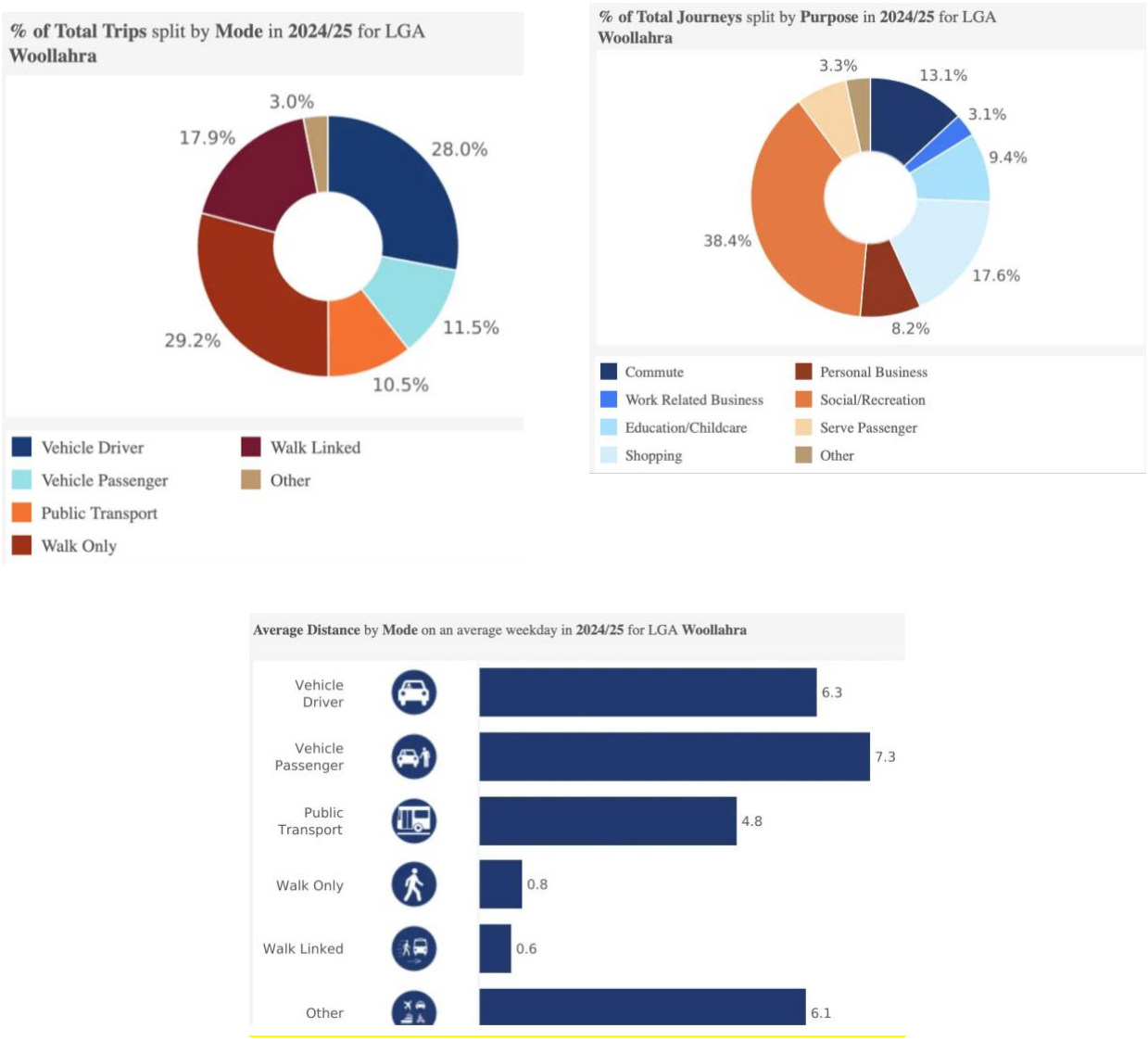
Data from the NSW Government's *Household Travel Survey* (HTS) provide an indication of the travel patterns of those presently living and working in the Woollahra LGA, as well as an indication of the potential growth in transport demand associated with the Proposal. The TMAP presents information from the 2023-24 HTS, but only for the Woollahra SA2.

The TMAP acknowledges that an overall transport solution is required, one that caters for all types of trips. It states:

> *The HTS shows that social and recreational trips account for the largest share of travel at 36 per cent, followed by shopping at 17 per cent and work-related travel at 14 per cent. This is an important finding for the rezoning because it reinforces that the transport response needs to support not only peak commuting, but also a broad range of local daily trips between homes, centres, services, schools, recreation areas and public transport.*[5]

The most recent HTS data for 2024-25 (see the three charts in Figure A2) shows there are approximately 270,000 weekday trips per day beginning and/or ending in Woollahra. Applying Woollahra's 2025 ERP of 55,218 persons yields an average trip rate of 4.9 trips per person per day.[6] Of the total number of trips, around 74,000 are by the driver of a vehicle. This suggests the driving-age population in Woollahra has an average 2 trips.

Figure A2 – Travel Patterns in Woollahra in 2024-25



Data from the Census also yields important insights, especially the significance of travel by car for the journey to work. Results from the 2016 Census (which is more relevant compared to the COVID-period 2021 Census) shows the mode taken by Woollahra LGA residents travelling to work. On the day of the Census, the most common methods of travel to work for employed people included Car, as driver 37.3%, Train 12.0%, Walked only 8.7%, Worked at home 8.5% and Bus 8.2%. On the day, 30.0% of employed people used public transport (train, bus, ferry, tram/light rail) as at least one of their methods of travel to work and 42.5% used car (either as driver or as passenger).

At p.40, the TMAP states, "In 2021, during the Covid lockdown, working from home dramatically increased to 67 per cent, while 19 per cent drove a car and other modes were relatively small. This

6 Transport for NSW https://opendata.transport.nsw.gov.au/data/dataset/household-travel-survey/resource/2a29cb63-c2c9-4cb4-9a33-e84074158820, Accessed on 13 October 2026. 'Walk linked' is a walking trip to another transport mode. 'Other' includes cycling.

suggests good digital connectivity and professional roles conducive to remote work, with a strong change from 2016 travel patterns." COVID was a unique period, and travel patterns will have shifted back somewhat since that time. Indeed, many employers are requiring their staff to 'return to work', i.e. return to working in the office, etc. That said, the Society recognises that 'working from home' (WFH) is still significant. Research in 2025 by Roy Morgan found that 55% of workers in Sydney work from home at least part of the time. Among CBD workers, the percentage was 70%.[7]

Even with WFH more common than previously, car travel is still likely to be substantial. Relevantly, the TMAP shows rates of car ownership per household are higher in Woollahra and Double Bay-Darling Point than in two other areas (St Leonards-Naremburn and Rhodes) that have been or are experiencing redevelopment.[8]

A6.2 The strategic priorities in the TMAP

The Proposal and the TMAP presently rest on two foundational propositions:

- delivery of the railway station
- a focus on initiatives to improve 'passive transport', i.e. walking and cycling.

These are potentially fine, but the transport plan for the precinct must also acknowledge and address bus transport, private motor vehicles and freight movements.

A6.3 The proposed Woollahra Station

Construction of the station appears to be unfunded and uncommitted, and the estimated cost of the station has not been published. Moreover, the status of a business case for the station is unclear. Hardly an encouraging foundation for the central 'plank' underpinning the Proposal.

We understand a budget for the station has not been committed, even though the Government has announced construction from 2027 and opening in 2029. While the station receives a passing mention in the Government's *NSW 2026-27 Budget Paper No. 3 – Infrastructure Statement*, there appears to be no funding allocation for the station. Other infrastructure projects with budgets likely to be well under that required for the station are listed in the budget, but not the station. This suggests the robust site analysis, planning and 'project development' for the project was not undertaken in time for the project's inclusion in the 2026-27 state budget. This raises reasonable questions about the government's ability to deliver the station by 2029 and, indeed, beyond.

Infrastructure NSW's (INSW) 'Gateway' assessment for the station business case needs to be published. Infrastructure projects in NSW are required to pass through a multi-stage 'gateway' process managed by INSW. The station is likely to be a 'high profile/high risk' project requiring an assessment at all gates. By this stage in the development of the Proposal, the case for the station should have been assessed at least at Gate 0 – Confirmation of Service Need and Gate 1 – Analysis of Service Need as well as, one might have thought, a review of a business case at Gate 2. The business case should be published in full in order to address valid community concerns about the viability of the station project and the lack of committed funding for the project.

TFNSW''s consultant is consulting now with stakeholders as part of a social and economic impact assessment of the station 'activation project'. The extent and scope the activation project is unclear. This timing suggests that preparation of a Review of Environmental Factors on the station and the activation precinct is unlikely to be completed until the end of 2026 or probably early 2027, raising serious questions about the claim that the project will be delivered by 2029.

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7 Roy Morgan (2025) *More than 6.7 million Australians 'work from home'*, https://www.roymorgan.com/findings/9981-work-from-home-june-2025

8 Transport for NSW (2026) *Transport Management and Accessibility Plan*, p. 18. It appears, though this is not made clear in the report, that the locations are ABS SA2 areas.

The Proposal seeks to collect $15,000 per dwelling (or $200 per square metre of commercial floor space) from development within 800 metres of the station to fund construction of the station. Unless the NSW Government is prepared to fund construction of the station 'upfront', delivery of the station will necessarily be tied to the pace of development, which is itself uncertain.

The basis for the $15,000 per dwelling contribution rate is not specified in the Proposal. Even if the Proposal provides for a net increase of 9,400 dwellings, i.e. after demolition of existing dwellings, or a gross 9,400 dwellings (the Proposal does not make this clear), the total yield from the contributions is highly unlikely to be more than half the cost of the station, and could quite easily be somewhat less than that percentage. Given pressures on the NSW Government's capital budget, shortfalls or delays in the receipt of developer contributions could easily lead to delays in the construction of the station or, perhaps more likely, delays in other works necessary to support development of the Edgecliff-Woollahra area. Either way, there will be impacts on the precinct and surrounding areas, including Paddington.

The conclusion from this must surely be that any rezoning needs to be contingent on delivery of the station. This should mean not just funding in the state budget, but signed contract(s) for construction. After all, successive NSW Governments have had a history of promising projects, then delaying them or cancelling them altogether.

A6.4 Traffic and road network - general

As noted earlier, more than 72,000 per weekday use New South Head Road near Edgecliff. Almost 40,000 vehicles per day use Syd Einfeld Drive, a figure that rises to around 60,000 vehicles per day immediately west of the Ocean Street/Oxford Street intersection. These figures underscore just how busy these arterial roads are already.

Important 'connector roads' in or immediately adjoining the precinct also carry high traffic volumes. Ocean Street, Edgecliff Road (the station is proposed immediately east of the road) and York Road all carry more than 20,000 vehicles per day.

Yet, the Executive Summary of the TMAP concludes that "the traffic demand remains within the capacity of the road network" and "increased demand is likely to result in some localised congestion, and infrastructure initiatives have been identified to address this where necessary." The problem is: the traffic modelling to support these conclusions has not been made available for review; it contradicts various statements made in the TMAP, and it is inconsistent with the 'lived experience' of many residents and businesses.

It is difficult to reconcile this with the information in the TMAP. Table 7.3 shows that Transport for NSW is expecting 89,000 additional trips (compared to the base case) under the 100% yield (10,000 dwellings) scenario and over 62,000 trips under the 60% yield (6,000 dwellings) scenario.

The transport studies do not appear to account for the SSD and LMR developments approved or under consideration further east in the LGA, or for the cumulative impact of other development already approved or permissible.

The proposals for transport improvements around Edgecliff are a particular problem. The proposed cycleway on Ocean Street needs to be reconciled with the traffic, parking and bus demands that the Proposal itself will create, and with the new road connection described above.

Figure 24 in the draft *Design Guide* suggests the section of New McLean St between New South Head Road and (approximately) the bend in the street would become a plaza, while the TMAP which shows the same section of New McLean St as a road). Indeed, the GT2 in the TMAP flags an intention to examine lengthening the turning lane for eastbound traffic turning out of New South Head Road into

New McLean Street. This attests to the rushed nature of the Proposal. The Government's intentions for this intersection need to be made clearer.

The New South Head Road/Ocean Street/Ocean Avenue intersection is already at or close to capacity. The TMAP refers to a 2024 study of New South Road which found, "The forecast degree of saturation (DoS) of 0.98 in the AM peak hour for the New South Head Road-Ocean Street-Ocean Avenue intersection is reflective of the approaches from Ocean Street South and New South Head East, forecast to operate near capacity. This suggests that further demands on these two approaches cannot be accommodated beyond the trips generated by the potential development."[9] Relevantly, the potential development examined in that study was less than what is not contemplated as part of the Proposal.

Since then, further development in the Woollahra LGA is underway and will continue, particularly in Double Bay and Rose Bay. Car-based trips from future development in these areas will, in many cases, use New South Head Road to gain access to the CBD and other locations west of Edgecliff. This will add to existing congestion around the Ocean Street/Ocean Avenue, New McLean Street, Darling Point Road and Mona Road intersections.

Future development in parts of the Waverley LGA, notably Bondi Junction, will add to demand on the road networks in Edgecliff and Woollahra. Additional development in Bondi Junction will generate additional transport demand. While some the transport demand from that area will use public transport (and potentially cycling infrastructure), some will also pass through Edgecliff and Woollahra. In particular, car drivers from that area who are looking to access the Cross City Tunnel/Harbour Tunnel or the northern part of the CBD are highly like to use Ocean Street and New South Head Road.

Edgecliff Road cannot provide credible access to the proposed Woollahra station. Edgecliff Road is completely inadequate to accommodate the vehicle and pedestrian access that a new station, and the high-density centre proposed around it, would require. The road already handles something in excess of 20,000 vehicles per day.[10] There is no provision for safe pedestrian movement, drop-off and pick-up, buses, taxis, bicycles or service vehicles, and no plan for how Edgecliff Road would be upgraded, at what cost, or by whom.

The limited scale of investigations to date presents real risks of 'cost blowouts'.

The TMAP's implementation plan does not guarantee delivery. It does not commit to what will be built, when, or by whom. Nor should it, given the serious questions and unresolved issues associated with the suite of initiatives forming that plan. Much more work needs to be done to provide the foundation for a credible plan that can be funded and delivered.

Rezoning must follow funding for the station, not precede it. A large part of the rezoning, including towers of up to 32 storeys, depends on the station. If the station is not delivered, would the rezoning remain in place? The Society asks that the rezoning of Edgecliff-Woollahra not proceed until the station is fully funded in the State Budget. This would provide certainty and allow time for unresolved details to be worked through.

A6.5 Traffic issues associated with additional development at 400 Glenmore Road

Traffic associated with the construction of a residential tower at 400 Glenmore Rd would inevitably traverse the local streets of Paddington for several years.

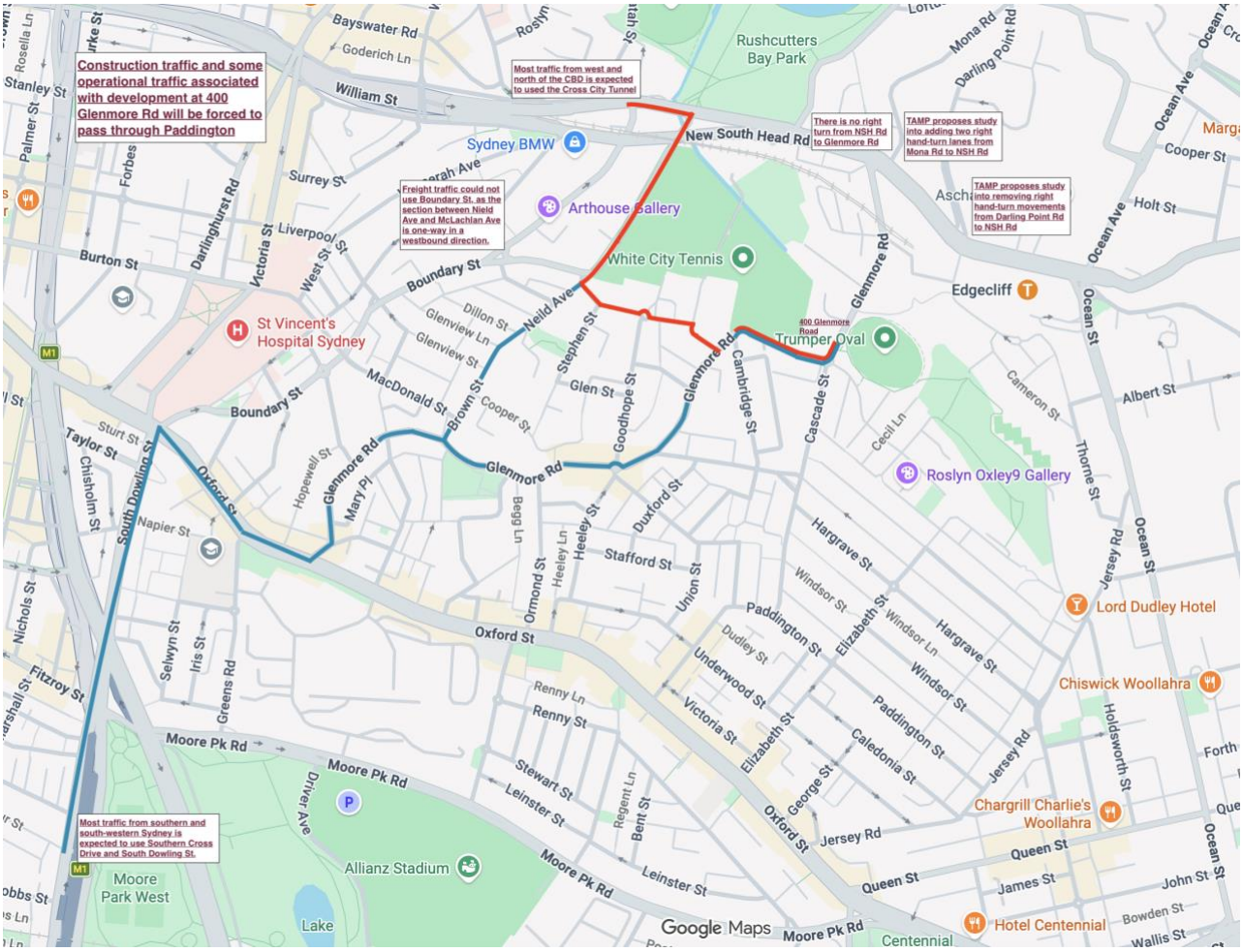
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9 Transport for NSW (2026) *Transport Management and Accessibility Plan*, pp,130-131

10 Transport for NSW, https://www.transport.nsw.gov.au/system/files/media/documents/2023/Traffic%20volume%20map%20-%2012D.pdf. Accessed on 5 October 2026. The map in question shows that Edgecliff Road and Ocean Street, handle at least 20,000 vehicles per day. The specific traffic volumes are not shown on the map.

As shown in Figure A3, from the south, traffic would move almost exclusively from South Dowling Street, through the centre of Paddington, to the site. From the west, traffic will need to move from William Street/New South Head Road to the site. However, for traffic looking to access 400 Glenmore Road, there is presently no right-hand turn out of New South Head Road and south into Glenmore Road. Construction-related traffic from the west would almost certainly turn from New South Head Road into Neild Avenue (adding to queuing and safety problems on New South Head Road's eastbound lanes in that location), then on to Neild Avenue and Lawson Street, then finally on to Glenmore Road. That construction traffic is highly unlikely to pursue an alternative route through Edgecliff to Ocean Street, then Hargrave Street, Trelawney Street, Jersey Road and, finally, on to Cascade Street; such a route would be both longer for traffic looking to access 400 Glenmore Road and more congested.

Figure A3 – Routes expected to be used by construction and operational traffic accessing 400 Glenmore Rd, Paddington



Source: The Paddington Society

Unfortunately, Transport for NSW's *Guide to Transport Impact Assessment*[11] is silent on estimating construction-related traffic associated with new development. This complicates calculation of prospective volumes of construction traffic, e.g. number of trucks, number of light vehicles ('tradies' utes), etc. Many workers and subbies will need to drive to bring their equipment and materials. Moreover, public transport to enable tradespersons to travel to site by 7:00am is pretty limited, so

11 Transport for NSW (2024) *Guide to Transport Impact Assessment*, https://www.transport.nsw.gov.au/system/files/media/documents/2025/print-version-guide-transport-impact-assessment-TS00085-v1.1.pdf

most are likely to drive for that reason alone, even if they are not bringing materials and equipment to site. Where will the vehicles park?

Once a development at 400 Glenmore Road is completed, drivers needing to access the site would still need to pass through Paddington (as noted above, for east-bound traffic on New South Head Road, there is no right-hand turn out of New South Head Road to Glenmore Road). Depending on their destination, some drivers departing 400 Glenmore Road would still pass through Paddington. Many though would leave the development via Glenmore Road, adding materially to congestion at the Glenmore Road/New South Head Road intersection.

This additional traffic and congestion needs to be placed in context, especially as the TMAP proposes various initiatives along this section of New South Head Road (discussed further in Section 6).

NSW Government data shows that, less than 300m west of the intersection with Glenmore Road (at Rushcutters Bay Park), some 72,044 vehicles use New South Head Road on an average day in 2026. Nine percent of those vehicles are commercial vehicles.[12] At this location, New South Head Road is one of the busiest arterial roads in Sydney.[13]

Yet the TMAP supporting the Proposal says nothing about traffic changes at the intersection of Glenmore Rd and New South Head Road.

Moreover, it (remarkably) proposes to "Investigate implementing a double right turn from Mona Rd into New South Head Rd to improve the intersection performance" (item GT9 in the TMAP), barely 20m east of the Glenmore Road/New South Head Road intersection. (This proposed initiative is seemingly intended as a means of accommodating traffic from the expected closure of right hand turn lanes out of Darling Point Road into New South Head Road (GT1)). It is almost inconceivable to envisage how a right-turn lane into Glenmore Rd could be accommodated in the road reservation. As a result, traffic associated with 400 Glenmore Road and at least some of the intended development set out in the Proposal would:

- forever pass through Paddington on the way to the site and, in turn,
- lead to further congestion and queuing as traffic leaves 400 Glenmore Road and seeks to join New South Head Road.

A6.6 Closure of New McLean Street and a new road from Ocean Street to Glenmore Road

The Society objects to the proposal to close the north-south leg of New McLean Street to create a small public open space (Initiative P2 in the TMAP) and, in its place, build a new road from Ocean Street into the eastern end of New McLean Street, with a new western connection down into Glenmore Road.

It should be noted there are also inconsistencies between the road alignment shown in the TMAP and the *Proposed Active Street Frontage Map*, which shows 501 Glenmore Road as an active street frontage. It can't be both; this does not provide confidence that the various parts of the Proposal have been thought through. We object to the road proposal because:

- it would fall some 30 metres via a steep, winding route from Ocean Street to Glenmore Road, raising serious questions about its gradient, safety and feasibility.
- as noted in Table 7.9 of the TMAP, the "key intersection" at New South Head Road/Ocean Street/Ocean Avenue is "operating near capacity". We believe other intersections are also already at capacity

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[12] Transport for NSW, *Traffic Volume Viewer*, https://maps.transport.nsw.gov.au/egeomaps/traffic-volumes/index.html#/?z=18&lat=-33.87604457865292&lon=151.23111691261371. Accessed on 5 October 2026

[13] As a point of comparison, daily traffic volumes along significant sections of Parramatta Road in 2022 and 2023 (i.e. before the relevant section of the WestConnex project was opened in November 2023) were around 60,000 vehicles per day.

- there is no information in the TMAP showing, even conceptually, how the proposed road would actually work, e.g. whether it would be one-way or two-way, be open to both general traffic and commercial vehicles, be closed to pedestrians and cyclists, how turning movements into and out of future developments at Edgecliff would work; whether the intersections with Ocean Street and Glenmore Road would be signalised; and implications for bus movements into/out of Edgecliff.
- the sheer volume and type of traffic that would need to use the road must be fully appreciated. This part of Edgecliff is proposed to have the highest floor space ratios and highest non-residential floor space ratios in the entire Edgecliff-Woollahra area. On the Society's initial (and very quick calculations), the proposed floor space ratios would permit:
    - in the order of 90,000 m^2 of non-residential uses, including retail and commercial uses
    - in the order of 230,000 m^2 of residential floor space, which, at an average dwelling size of 100m^2, would equal 2,300 units.

  Even allowing for the presence of the railway station, the traffic volumes needing to use this road, especially at peak times, needing to use the road will be very large
- all traffic to and from the Edgecliff commercial precinct would have to pass through a number of narrow intersections, most, it appears, with only one lane in each direction and little or no room for queuing
- even allowing for the early stage of analysis and planning underpinning the Proposal, to suggest or imply (seemingly with this level of design and this prospective intensity of use) that the road is to be <u>the</u> means of serving Edgecliff is breathtaking
- the indicative road alignment shown in Figure 8.1 of the TMAP shows the proposed road intersecting with Glenmore Road immediately south of the existing railway viaduct over Glenmore Road, a location where there is effectively no room to incorporate turning lanes from the south in Glenmore Road, i.e. the same section of Glenmore Road that will have to accommodate additional traffic from any development at 400 Glenmore Road and beyond;
- the indicative road alignment shown in Figure 8.1 of the TMAP shows the access road using High Street to then provide access on to and from Ocean Street. However, at least at present, at this location, there is a median strip preventing right-turn movements by southbound traffic on Ocean Street. If right-turn movements are planned as part of the Proposal, where would the turning lane be located? How long would it need to be?
- Traffic would need to traverse very narrow and, in some cases, very steep streets, e.g. High Street, Great Thorne Street and Arthur Street
- Between New McLean Street and Glenmore Road, the road would need to either make use of narrow driveways and/or require the demolition of existing blocks of units.
- the buildings that would need to be demolished to create the road have not been specifically identified, so neither the affected residents nor the community can properly understand the road's impact
- the cost estimate (described as '$$$', the third highest rating in the TMAP), is almost certainly under-stated. The TMAP makes it clear that land acquisition costs are not included in the cost estimate. On the indicative road alignment shown in Figure 8.1 of the TMAP, it is difficult to see how the new road could be developed without acquisition and demolition of at least some apartment blocks. The cost of acquisition would be substantial. Conversely, if it is argued that a road alignment can be found that avoids demolition of any apartment blocks, it is unclear what that would mean for the efficacy of the proposed new road, especially for heavy vehicles

Figure A4 illustrates some of these constraints.

Figure A4: Photos of current streets and driveways proposed to be used for a new Ocean Street to Glenmore Road servicing the Edgecliff Centre and other development



Looking east from South St, across Glenmore Rd to driveway to 501 Glenmore Rd (intended junction between new road and Glenmore Rd). NB – no room for turning lane from Glenmore Rd in either direction.



Looking south from driveway to 501 Glenmore Rd – NB curve in Glenmore Rd constrains sight lines. Traffic often queues back to this point during weekday morning peak and on weekends.



Traffic queuing in New McLean to turn right to NSH Rd., head straight ahead to Darling Point Rd (middle lane) and turn left into NSH Rd.



Driveway to 4 New McLean St (W side of the street). Proposed road extends through this property down to Glenmore Rd.



Looking east along New McLean St toward Arthur St



Looking north across New McLean St to one of two exits from Edgecliff Centre and loading dock



Looking from roundabout at top of New McLean St into Arthur St



Looking east from High St to Ocean St - NB median strip in centre of Ocean St and aged persons housing across the road.



Intersection of High St and Great Thorne St looking east along High St towards Ocean St.



Looking north along Great Thorne St from the intersection with Hill St – NB steep – appears to be @1:7 – 1:8 descent



Looking towards Arthur St from intersection with Glebe St



Looking broadly west from along Glebe St from the intersection with Arthur St

Other considerations include:

- we understand that the cost of the road is to be borne by Woollahra Council, an unreasonable impost on Council's budget and on its ratepayers for infrastructure required by a State-led rezoning;
- traffic would be pushed onto Glenmore Road and into Paddington's narrow streets, which cannot absorb such an increase; and
- The TMAP suggest that the construction of the road would be staged, "In accordance with new development". It is unclear what this phrase means, but it raises the possibility that:
    - development of the road may take many years to be completed;
    - the road may not be completed. The development feasibilities may be such that one or more sections of the road simply are not built.

It is therefore unclear what is proposed to occur during the interim period (or potentially, permanently) if these outcomes come to pass.

A6.7 Walking and Cycling

As a broad principle, the Society is supportive of measures aimed at encouraging 'passive transport' (subject to the details of the initiatives also being 'right'). The Society's principal question with these initiatives in the TMAP is whether the local and higher order road networks have the space to accommodate both passive use and motor vehicles (both moving vehicles and on-street parking).

Road widths throughout the Edgecliff-Woollahra area are constrained and have not been sufficiently acknowledged in the list of proposed initiatives. As an example, the TMAP includes a proposed two-way cycle lane on New South Head Road. The TMAP suggests, the cycle lane would be provided "where feasible through ground floor setbacks (retaining the existing carriageway) and a shared path otherwise". It is unclear how this could be accommodated, while at the same time implementing the 0m setback along New South Head Road suggested in the *Urban Design Report* (at p.89)

A7 - Visual and amenity impacts

Density should respond to topography and place. The slopes running down from Oxford Street have a wonderful relationship with Rushcutters Bay and Sydney Harbour. That relationship is already disrupted by the 12-storey Bayside building at 85 New South Head Road. It would be a tragedy if a wall of towers extended along New South Head Road and into the Rushcutters Creek valley. More height west of Glenmore Road would be a disaster for Paddington.

Proposed dwellings in Darling Point Road would overshadow other dwellings and reduce the outlook of existing dwellings further to the east.

A7.1 400 Glenmore Road, Paddington

The Society strongly opposes the rezoning of 400 Glenmore Road. The Proposal would:

- change the zoning from R3 Medium Density Residential to R4 High Density Residential;
- increase the maximum height from 9.5 metres to 74.2 metres, an additional 64.7 metres, or about 24 storeys, similar in height to Blues Point Tower;
- allow an indicative floor space ratio of 2.2:1 on a site of 6,234 square metres, or about 13,714 square metres of gross floor area; and
- permit a building three times the height of the eight-storey buildings the Society and the Council stopped in the 1960s, in an area where the heritage controls limit buildings to some three storeys.

At roughly 100 square metres per apartment, this would yield about 137 apartments. The site already contains 53 dwellings, all of which would be demolished. All of this impact would be for a net gain of perhaps 84 dwellings. The "trade" offered is a small park on Rushcutters Creek, and we see no justification for additional playground space west of Glenmore Road to serve Edgecliff.

The site is on the valley floor of Rushcutters Creek and is subject to high flood risk. Previous attempts to build basements in the Rushcutters Creek floodplain have experienced serious difficulties. The Heritage Assessment makes no assessment of this site, and its own recommendation is that tower forms be located only at and around the railway stations.

The top of a 74.2 metre building on this site would be at approximately RL 80 metres. It would therefore tower over the public domain of Paddington, as shown in Table A1.

Table A1: Height of development at 400 Glenmore Road above the horizon when seen from various viewpoints in Paddington

Public viewpoints in Paddington	Street level (RL, m)	Tower top above viewpoint (approx.)
Corner of Oxford Street and Jersey Road	72.50	7.5 m
Corner of Oxford and Ormond Streets	67.54	12.5 m
Corner of Paddington and Cascade Streets	54.24	26 m
Corner of Oxford Street and Glenmore Road	49.98	30 m
Fiveways (Glenmore Road)	39.13	41 m
Corner of New South Head Road & New McLean Street	33.00	47 m

Looking down Cascade Street from Paddington Street, a key public viewpoint, the tower would stand about 25 metres above the horizon. Looking down Glenmore Road from Fiveways, it would be about 40 metres above the horizon line. It would be highly visible from Oxford Street, one of Sydney's most important heritage streets.

A8 - Social infrastructure

Section 3.2.3 of the *Explanation of Intended Effect* states that the Proposal "will not create a need for a new school in the short to medium term", relying on existing capacity at Woollahra Public School and surrounding schools. An additional 19,740 residents will inevitably include many children. There is no plan for their long term needs, and no apparent consideration of secondary schools. Local schools are already in high demand.

- **Health:** There is no plan for additional GP clinics, community health or hospital capacity.
- **Child care:** Demand for child care will increase significantly, but no provision is identified.
- **Community facilities:** Very little in the way of additional community facilities is proposed.
- **Aged care:** The Proposal does not address aged care, despite the older age profile of people living in the area.
- **Emergency services**: It appears no provision is to be made for additional or upgraded emergency services to support the additional population.

A8.1 Schools

Section 3.2.3 of the *Explanation of Intended Effect* fails to grasp the depth of community concern about the provision of public school infrastructure in Paddington, Edgecliff and Woollahra. Notwithstanding the re-development of Randwick High School, the need for another high school in Sydney's northern-eastern suburbs, in particular, is a regular topic of discussion.

The experience with planning and delivery of schools in other growth areas demonstrates that the confidence displayed in the EIE is not shared by the community.

The report on social infrastructure states that School Infrastructure NSW "does not use numerical standards" and therefore proposes 'indicative standards' for:

- the provision of public secondary schools on the basis of 2,000 secondary school students, i.e. serving a population of 10,000 - 25,000 people
- the provision of public primary schools on the basis of 1,000 primary school students, i.e. serving a population of 2,000 - 10,000 people.

The table below shows the number of potentially school-age persons living in the Edgecliff-Woollahra area at the 2021 Census.

Table A2: School-age children as a % of the population in the Edgecliff, Paddington and Woollahra SA2 areas at the 2021 Census

Name of ABS Statistical Area 2	No. of persons aged 5-12 years	No. of persons aged 13 - 18	Total Population for the SA 2	5-12 year olds as % of total population	13-18 olds as % of the total population
Double Bay-Darling Point	499	431	9,958	5.0%	4.3%
Paddington	854	694	14,793	5.8%	4.7%
Woollahra	563	547	7,454	7.6%	7.3%
Total	1,916	1,672	32,205	5.9%	5.2%

Source: Analysis by The Paddington Society of data from the Australian Bureau of Statistics – 2021 Census - Community Profiles for the Double Bay-Darling Point, Paddington and Woollahra Statistical Area 2s, https://www.abs.gov.au/census/find-census-data/search-by-area

If the percentages above (especially for the Woollahra SA2) are applied to the population expected to arise from the Proposal and the 'indicative standard', it is clear that:

- at least an additional primary school will be required (say, 6% of a population of 19,740 = 1,184 students)
- the case for a new high school in the eastern suburbs becomes more compelling (the same 6% assumption would generate 1,184 secondary students. Population growth from the other LMR/SSD developments in Sydney's east will add to that pressure.

The NSW Government announced in June 2026, "The NSW Government will invest a record $9.2 billion in school infrastructure over the next four years as part of the 2026-27 NSW Budget, delivering new and upgraded schools to ensure every family has access to a world-class public education, close to home."[14] However, there is no focus on planning and budgeting for new schools or substantive school upgrades in the Edgecliff-Woollahra catchment.

Instead, the 2026-27 budget papers:

- show that by June next year, some $38 million will have been spent on an upgrade to Randwick High School
- do not mention planning for a new high school at Edgecliff over the period to 2029-30, although the papers do refer to a "Castle Hill High School – Planning (for long term future)" project [why not for the Edgecliff-Woollahra-Paddington area?]
- make no mention of new primary schools, or upgrades to existing primary schools, that might serve the Edgecliff-Woollahra-Paddington area.

All of this points to poor planning, delays and overcrowded schools.

Capital costs associated with new schools

The development of new school(s) is likely to be the most expensive form of social infrastructure required to support higher density development in Edgecliff-Woollahra. Given the cost of acquiring land (schools are commonly two or more hectares in area), any school or schools would almost certainly be multi-storey in nature. An idea of the potential cost of such schools can be seen in the Inner Sydney High School built on the site of the previous Cleveland Street Intensive English High

[14] School Infrastructure NSW (2027) https://www.schoolinfrastructure.nsw.gov.au/news/2026/06/nsw-government-delivering-a-record--9-2-billion-for-new-and-upgr, Accessed on 13 October 2026

School in Surry Hills. The NSW 2022-23 Budget papers (by which time the school was nearing completion) show that the school was estimated to cost $135.5 million[15] (in real terms, now probably in the order of $150+ million. It needs to be remembered that that high school was built on the site of an existing school, so there were no land acquisition costs. Given that difference, development of a new school in Edgecliff-Woollahra would be somewhat more expensive than that figure. Beyond the substantial cost, the budget paper also suggests that development of the high school took seven years to complete. Again, this underscores the limited analysis in the Proposal and its associated *Infrastructure Delivery Plan*.

A9 Water, energy and telecommunications

- The capacity of ageing water supply, sewerage and stormwater infrastructure to support 9,400 additional dwellings must be demonstrated, with upgrades funded and scheduled.
- Electricity, gas and telecommunications upgrades need to be identified and funded.
- Utility works need to be coordinated with each other and with the transport changes, so that streets are not repeatedly dug up. This is not easy, but the Government must try.

A10 Tree canopy and biodiversity

- **Tree canopy.** The Proposal commits only to maintaining overall tree canopy, not increasing it, and Council has warned of a significant reduction in tree cover. Notwithstanding the site amalgamation provisions in the Proposal, large building footprints and basements leave little room for deep soil planting and mature trees, which are essential for cooling, amenity and biodiversity as the climate warms.
- **Threatened species.** Mature trees and bushland corridors such as Trumper Park and Rushcutters Creek support threatened species such as the Powerful Owl. The impacts of tree loss, shadowing, lighting and construction on these species need to be properly assessed.

A11 Delivery, sequencing and budgets

The *Explanation of Intended Effect* states, "Timely and coordinated delivery of … infrastructure is fundamental to the Precinct's success." However, Section 4 of the EIE paints an implausibly optimistic view of how the required infrastructure will be funded.

The *Infrastructure Delivery Plan* needs to be a committed, funded and sequenced program, with infrastructure delivered before or alongside new housing, not after it. However, the document is so high-level that it is misleading to call it a 'Plan'. In general, the Proposal's approach to the provision of infrastructure is founded on the following presumptions:

- broadly, there is sufficient capacity within existing networks and assets to meet additional demand associated with development anticipated under the Proposal
- in those cases where additional infrastructure is required, it can broadly be provided within the footprint of existing infrastructure
- there is a 'Micawber-like' or 'she'll be right' optimism about infrastructure funding.

For the reasons set out below, these presumptions are highly problematic. They pose significant risks, both budgetary and for the quality of life of residents in the area and beyond, i.e. the risk that adequate infrastructure will not be provided at all or, at best, will be materially delayed.

The various reports exhibited to support the Proposal provide little and, in some cases, no analysis to demonstrate that there is sufficient capacity to meet plausible demand. For example: service

[15] NSW Government, *Infrastructure Statement – Budget Paper No. 3*, https://www.nsw.gov.au/sites/default/files/noindex/2026-01/2022-23_budget-paper-no-3-infrastructure-statement.pdf, Accessed on 6 October 2026

standards are not assessed in any detail; analysis about the plausible demand and the timing of that demand arising is quite limited, and lead times for the provision of infrastructure are not provided.

Without some sense of the scope of potential infrastructure solutions, even a sketch plan, there can be no certainty or confidence that any required infrastructure upgrades can be accommodated within the existing footprint of existing assets. This is most relevant in the case of transport infrastructure. However, it is also relevant for various forms of social infrastructure, notably schools. If the infrastructure can't be accommodated within the existing footprint, then:

The cost of the infrastructure in question will be higher, both because of land acquisition costs and because of the need, at least in some cases, to demolish existing buildings, or

The infrastructure may not be provided at all, or with limited scope (i.e. to fit an available budget envelope). That is not a financial cost, but it is an economic cost in terms of the under-provision of necessary infrastructure services.

There is no detail (even in a range) or itemisation of anticipated infrastructure costs or confidence limits around those cost estimates. For example , the TMAP simply uses what can best be described as a visual guide – a $ to $$$$ indicator - of the anticipated cost of the relevant initiative. There isn't even a range of costs associated with each of the signs, e.g. a $ indicator = $X – Ym.

Moreover, several of the initiatives highlighted with a single $ sign appear to be for the cost of particular studies; they do not provide any indication whatsoever of the potential range of costs associated with possible or likely infrastructure works arising from those studies.

As the Government would know, there is a considerable body of literature and direct experience in New South Wales of infrastructure projects ultimately costing more than was first anticipated. This is not a problem confined to NSW; it is a worldwide challenge. But it does highlight the extraordinary risks associated with embarking on the Proposal without a far more rigorous understanding of prospective infrastructure costs and how they will be funded.

Critically, the $1.33 billion estimate (in 2026$) for the total cost of the proposed infrastructure excludes land acquisition costs. Land in the Edgecliff-Woollahra precinct will be expensive for two reasons:

- the underlying land is intrinsically expensive, because of its proximity to the city and the coast, and
- secondly, because most if not all of the land required for additional infrastructure will be developed in some manner (and often with existing high density development).

Given those factors, it is conceivable that land acquisition costs could reach several hundred million dollars. There is little detail on how the infrastructure costings were prepared.

There are no cash flow projections in the exhibited documents that show when expenditure will be required and when revenues will possibly be available. Equally, there is no discussion about financing, as opposed to funding, arrangements to cover cashflow short falls. Estimated costs appear too low, and do not appear to include land acquisition.

Budgets are optimistic, and there are no cashflow projections showing when funds will be available relative to when residents arrive.

A11.1 NSW Government capital expenditure

These are not hypothetical concerns about the veracity of the Proposal's infrastructure assumptions. Quite the reverse; the fiscal context in which the Proposal has been developed makes those concerns all the more relevant.

The NSW Government's 2026-27 Budget projects that 'general government' capital expenditure will fall from 2.5% of Gross State Product (GSP) in 2024-25 and 2025-26 to 1.9% of GSP by 2029-30. In nominal dollars, capital outlays are projected to fall from $21.9 billion in 2026-27 to $20.6 billion in 2029-30. The Government's 2026-27 NSW Intergenerational Report (IGR) describes the decline in capital spending as a share of GSP as reflecting, "a more targeted pipeline, designed to deliver essential infrastructure and services within a sustainable limit." The IGR then assumes that general government capital expenditure will average 1.9% of GSP over the next 40 years, and that transport's share of capital spending will need to fall to allow increased capital spending on health. Media coverage of a recent speech by the NSW Treasurer points to the Government's focus on reducing infrastructure spending:

> *Premier Chris Minns has frequently indicated his desire to get the state budget back in surplus rather than committing to expensive new city-shaping infrastructure projects. That sentiment is echoed in the treasurer's speech, which indicates the government will not be making expensive election promises over the next six months.*
>
> *"At the March election, I will, and the premier will, ask the people of NSW for a mandate to go further in the fight against inflation," [Treasurer] Mookhey will say.*
>
> *"The Minns government will not promise to spend money NSW's families do not have, on promises the state cannot afford.*
>
> *"From tonight, every promise in the NSW election campaign, ours included, can be measured against two fiscal guardrails: a plan to cut debt by at least $10 billion, and a net debt ceiling of 15 per cent of GSP.*

The Government's budget assumptions and the resulting overall fiscal strategy may or may not be reasonable. However, they only add to our concern that the NSW Government capital funding required for the Proposal to deliver development that is well-supported by infrastructure will not be forthcoming.

A11.2 Utilities and IPART

The *Infrastructure Delivery Plan* says very little about the funding of utility infrastructure. There is a presumption that:

- the utilities will prioritise upgrades to their infrastructure as they see fit
- where utilities operate within a regulated asset base, that:
  - the upgrades will feature in the relevant utility's capital plans and submissions to the Independent Pricing and Regulatory Tribunal (IPART)
  - and that the Tribunal will support the inclusion of the upgrades in

The Society believes that further testing of these presumptions is required with the utilities and with IPART.

A11.3 Developer contributions

The proposed funding arrangements rely heavily on developer contributions ($556 million out of the $1.33 billion estimated cost of infrastructure). The *Infrastructure Delivery Plan* provides no insight as to how this figure has been calculated, even the split between contributions for state versus council-provided infrastructure. This creates a real risk that essential infrastructure, including the station, schools, open space and flood mitigation, will be delayed until well after the new population arrives, or never delivered at all.

Developer contributions for state/regional infrastructure under the *Housing and Productivity Contribution Order 2024* ($11,269 per unit as of 1 October 2026) and $15,000 per unit for the railway

station will not raise sufficient sums to meet prospective costs of state-provided infrastructure. These contributions rates are applied to new dwellings, i.e. after talking account of the number of existing dwellings.

As noted elsewhere in this submission, the documents released with the Proposal do not provide detailed information about the number of existing dwellings within the precinct. The Society is working on the basis that there are approximately 2,500 dwellings in the precinct at present. If so, 6,900 new dwellings would be developed in the precinct. On that assumption, and after applying the proposed station contribution rate and the current HPC rate, the total yield from developer contributions for state-provided infrastructure would be:

- $103.5 million for the station (probably a third or less of the potential cost of the station)
- $77.8 million for all other state-provided infrastructure (again, a fraction of the real cost of providing the infrastructure.

In short, funding the NSW Government share of required infrastructure through the HPC and station developer contributions is inconceivable. Yet the *Explanation of Intended Effect* includes the following platitude:

> *Where there are any limitations in use of a local contributions plan or the HPC, the Department, infrastructure providers and Council will need to identify a suitable alternative funding source such as grants, incentives or planning agreements. The Department will continue to collaborate with stakeholders to identify potential funding sources for infrastructure delivery.*

While this might sound reasonable and plausible, in fact it is grossly misleading. Underlying that statement is an assumption that alternative funding sources can be found or will be viable. However, grants may not be available. Given the density anticipated by the Proposal, further development incentives will probably have a significant adverse impacts on the area. And planning agreements are just another form of developer contribution. The more likely result is that contribution-funded infrastructure will either be delayed or not funded at al.

In fact developer concerns about the impacts of developer contributions on development feasibility and 'affordability' will almost certainly lead to a battle between the NSW Government and Woollahra Council about the use of developer contributions to meet their respective funding needs. As was seen in western Sydney in the first 10 years or so of this century, contributions for local infrastructure will almost certainly be 'squeezed' to assist the NSW Government bridge the inevitable funding gaps associated with this Proposal.

Developer contributions for state/regional infrastructure must be spent in the area. At present, the contributions are simply paid to a central fund managed by Treasury, and can be spent anywhere in the state. Given the demand for infrastructure funding in other areas of Sydney and NSW, we are gravely concerned that contributions to state infrastructure will never be spent in the Edgecliff-Woollahra precinct.

A11.4 Implications for Woollahra Municipal Council's budgets

The TMAP and *Infrastructure Delivery Plan* suggest that much of the infrastructure would need to be funded by Woollahra Municipal Council. The *Infrastructure Delivery Plan* estimates that costs to be borne by Woollahra Council would total $314.5 million. Some of the initiatives assigned to Council, notably the proposed road between Ocean Street and Glenmore Road, are likely to be very expensive. Regrettably, there is no itemisation of the 'headline' figure.

Nor is there any serious effort to provide anticipated cashflows for those outlays. The Society acknowledges there is inherent uncertainty around the timing of development and at least some of

the infrastructure. But it should have been possible to provide at least a plausible range of scenarios. One can only speculate as to why they have not been presented.

In any event, actual outlays are likely to be substantially higher than the figure presented above. As noted earlier, given the absence of any information about the scope of the various infrastructure and the failure to include land acquisition costs, there can be no confidence about the figure above.

Developer contributions to meet the estimated local infrastructure costs would need to be approximately $45,580 per net new dwelling (2026$).[16] As the cost of local infrastructure is under-estimated in the Proposal, actual contribution levels would need to be somewhat higher than that figure.

Council's *2026-27 – 2035-36 Long Term Financial Plan* expressly excludes, "Investment in infrastructure that may be required to meet NSW state government housing strategy targets". The financial plan incorporates the NSW Independent Pricing and Regulatory Tribunal's approval of a Special Rate Variation to fund $48.9 million for specific projects over a ten year period, ending in 2033. None of the projects are associated with the Proposal, as Council's application for a rate variation and IPART's consideration of the application predate the Government's station announcement and the Proposal.

The long-term financial plan, and the associated four-year delivery plan, are requirements of the NSW Government's *Integrated Planning Framework* for councils. They are aimed and ensuring the Council's financial sustainability. Table A3 summarises Woollahra Council's forecast capital expenditure over the period 2025-26 to 2028-29 across various areas of council activity. It shows that the Council is forecasting to spend a total of $85.7 million on capital items over the four years, of which the largest is transport and engineering ($39.2 million) followed by parks, trees and recreation ($12.3 million).

Council budgets are updated each year. Table A4 shows actual capital expenditure in 2025-26 and budgeted capital expenditure in 2026-27. Over the two years, actual and budgeted capital expenditure is expected to be about 10% less (around $4.5 million) than projected in the four-year delivery plan It appears this has been necessary in order to maintain the Council's overall financial position within acceptable limits.

Table A4 also shows the share of capital expenditure over the two years that was or is expected to be for renewal of existing assets versus the creation of new assets. It can be seen that just over half of the capital expenditure (51.9%) is for asset renewal. That percentage can be used to calculate an approximate amount that might be spent on asset renewal and new assets each year over the four years, i.e. $11.1 million. It needs to be remembered that this figure covers all capital expenditure across the entire LGA.

As shown in Table A5, dividing the *Infrastructure Delivery Plan's* estimate of Council-related infrastructure costs ($314.5 million) by $11.1 million suggests that the total cost would be equal to around 28 years of average annual capital expenditure – across all asset classes. Obviously, this is a very high-level assessment, but it illustrates the scale of the costs and financial burden of the Proposal, especially when it is recognized that:

- the total cost is under-stated because of optimism bias and the exclusion of land acquisition costs

[16] Calculated by dividing $314.5 million by 6,900 net new dwellings. The Council's current contribution rate for development with an estimated construction cost over $200,000 is 1% of the estimated cost of the development.

- the total is presented in real 2026$ not in nominal dollars, which would need to take account of inflation (which may well be at historically high levels over coming years).

Table A3: Anticipated Capital Expenditure by Woollahra Council – 2025/26 to 2028/29

Area	2025/26	2026/27	2027/28	2028/29	Four year total
Land and Building Services	2,132,000	133,750	850,750	1,330,320	4,446,820
Transport and Engineering	12,147,050	10,382,834	8,523,439	8,120,000	39,173,323
Environment and Climate Change	5,082,850	3,294,101	1,576,933	1,872,665	11,826,549
Parks, Trees and Recreation	3,879,500	3,278,368	3,084,000	2,025,000	12,266,868
Community Services, Culkture and Arts	132,000	483,000	950,000	593,000	2,158,000
Library Services	707,779	464,164	700,558	506,513	2,379,014
Corpoorate Services	3,593,000	3,311,000	2,250,000	4,265,000	13,419,000
Total	27,674,179	21,347,217	17,935,680	18,712,498	85,669,574

Source: https://www.woollahra.nsw.gov.au/files/assets/public/v/3/council/documents/delivery-program-2025-26-to-2028-adopted-22-june-2026.pdf

Table A4: Actual (2025/26) and Budgeted Capital (2026/27) by Woollahra Council, and share of spending on asset renewal versus the creation of new assets

	Actual 2025-26		Budget 2026/27		Total 2025/26 & 2026/27	
	$	%	$	%	$	%
Asset Renewal	12,100,000	68.0%	9,300,000	34.8%	21,400,000	48.1%
Acquisition of New Assets	5,700,000	32.0%	17,400,000	65.2%	23,100,000	51.9%
Total	17,800,000		26,700,000		44,500,000	

Sources: Analysis by The Paddington Society of Woollahra Council 's Operating Plan 2026/27 and Woollahra Council's Audited Financial Statements for 2025/26

Table A5: Estimated years of annual capital expenditure by Woollahra Council required to deliver the *Infrastructure Delivery Plan's* estimated cost (2026$) of infrastructure where Council has been assigned responsibility for delivery

Estimated total Council capital expenditure on new assets over four-year to 2028-29	44,471,172
Average annual capital expenditure on new assets	11,117,793
Projected number of years of average annual capex to meet $314.5 million in Proposal-related council capital expenditure	28.3

Source: The Paddington Society

A11.5 Sequencing and tying rezoning to funding

The Sydney Plan makes several references to integrating land use development and the sequencing of infrastructure provision. Examples include:

- RESPONSE 1: Increase housing supply, diversity and choice refers to "Updated local planning should address … infrastructure planning needed to support housing growth. (p. 61). The Plan also states, "The plan for Sydney's housing over the next 20 years is to rebalance population around existing and planned infrastructure. This includes higher density around centres and transport hubs, particularly in central and eastern Sydney. Infill and urban renewal remain the most cost-efficient way to deliver varied, accessible housing that meets the needs of the changing population. Western Sydney will continue to develop housing areas in established precincts and in sequenced greenfield precincts as they become zoned, serviced and development ready." (p.63)
- RESPONSE 4: Grow housing and jobs in well-located centres.
- RESPONSE 10: Sequence planned greenfield precincts. This is needed just as much in inner areas, especially if there is insufficient funding to provide infrastructure in a timely manner. (See p.91 and p. 93).
- RESPONSE 12: Align infrastructure to planned growth.

The Sydney Plan clearly recognises the need for sequencing development and the provision of infrastructure, at least in greenfield areas. It must now apply the same thinking and decision-making

to established areas. There is no good reason not to do so. Given the constraints on government capital expenditure, the NSW Government must establish a means of progressively 'switching on' additional development potential in sub-precincts. This will:

- moderate the impacts of construction and more realistic staging of infrastructure
- ensure that reasonable standards of service are provided to existing and new residents and businesses
- facilitate the assessment of cumulative impacts of development, both in the precinct and the Woollahra LGA.

The Government will need to be wary of pressure from developers to 'release' sub-precincts within the overall Edgecliff-Woollahra area. Pressure from developers to apply 'acceleration protocols' in greenfield areas has led to previous governments releasing land for development, only to find that they have not been able to fund and provide the necessary supporting infrastructure.