27 October 2026

The Hon. Paul Scully, MP
Minister for Planning and Public Spaces

Sent via: www.nsw.gov.au/nsw-government/ministers/minister-for-planning-and-public-spaces

Dear Minister

Edgecliff Woollahra Precinct Plan

The Edgecliff Woollahra Precinct is a beautiful and established part of Sydney that is unique to anywhere else in Australia. It boasts charming historic streets, distinctive architecture and changing topographies of ridges and valleys that create surprising pockets of ocean and city views.

The Edgecliff Woollahra Precinct supports a diverse housing mix in one of the most densely populated regions in the country. Many established apartments provide low and medium cost supply and contribute to the much-loved character of the region. It is an example of density done well.

The delivery of a new train station at Woollahra provides uplift opportunities and there is community support for additional density, but new housing development must be carefully planned following strategic place-based analysis.

The proposed plan has been devised from a predetermined target that is grossly excessive and inappropriate; if permitted to proceed, it would ruin an area that people across Sydney love and that is already pulling its weight in providing density and low and medium cost housing.

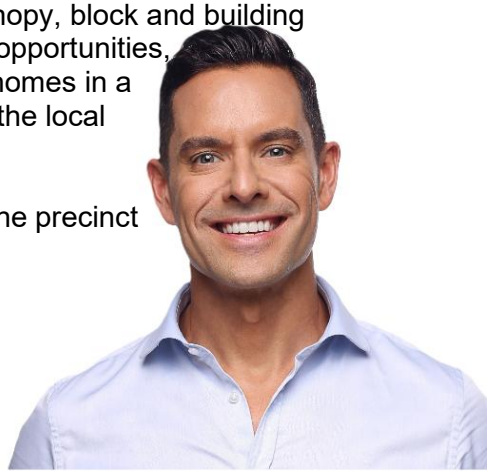
I call for more work to deliver a plan that responds to the advantages and challenges of the precinct in a way that protects its beauty, diversity, affordability, heritage and environment.

While my submission focuses on impacts in my electorate and on my constituents, I share wider community concern about overdevelopment in other parts of the precinct.

<u>Housing Target</u>
The Woollahra Municipal Council (WMC) local government area is one of the most densely populated in the state – reported as the seventh densest. The highly urbanised area is predominantly made up of apartments, and existing planning controls in the local government area already have the potential to deliver more than 10,800 additional homes, 5,200 of which would be within the precinct. Even with a new train station at Woollahra, the region cannot be expected to deliver the same dwelling numbers as greenfield and brownfield areas.

The WMC has undertaken comprehensive planning assessment to determine how much additional housing the Edgecliff Woollahra Precinct could accommodate with a new train station. The analysis included heritage values, topography, flood plains, open space, tree canopy, block and building separations, and the road network. The work identified significant uplift opportunities, finding the precinct could accommodate up to an additional 3,600 new homes in a way that would promote housing affordability, residential wellbeing and the local environment.

I share strong community concern that the target of 9,400 proposed in the precinct



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plan was established working back from a target devised solely for a political announcement. The department should instead use the WMC assessment as a basis, and work with the council to identify improvements and further uplift opportunities. The approach would enable new housing with community confidence and support.

The government should use the WMC plan as a starting point for further investigation, and work with the council to find the right housing target within existing constraints.

Within the target of 9,400 new homes, there is no clarity on how many existing homes will be demolished to get to that target. How many existing homes and apartment buildings up for demolition should be made clear.

The government should disclose the number of homes that would be demolished to reach the proposed 9,400 target.

Inter and Post War Apartments

Across the precinct, the plan proposes to rezone and amalgamate blocks currently occupied by apartment buildings built in the 20th Century in the arts and crafts, art deco and modernist traditions. These homes are a vital part of the precinct's visual, historic and social fabric.

The inter and post war buildings are regarded positively by the local and wider community for their aesthetic appearances. They add to the fine grained visual beauty of the precinct and contribute to the heritage values of adjacent conservation areas including the Paddington Heritage Conservation Area in my electorate – even when buildings have not been officially deemed "contributing" in plans. The apartment blocks line Ocean Street, Jersey Road and Edgecliff Road within and adjacent to my electorate, and streets throughout Woollahra, creating visual continuity and attractiveness.

Importantly these homes provide low and medium cost housing with good amenity close to the city. The apartments are attractive to live in because they are well maintained, visually appealing, bright, and have good ventilation – outcomes that would be difficult to achieve with amalgamated blocks and large floor plates. Inter and post war blocks have been built adjacent to each other providing a cohesive streetscape, something that towers can't achieve due to the separation needed.

Compared to contemporary apartment developments, inter and post war apartments are smaller and have lower rates of car parking. Many are in reach of owners and renters on modest incomes, supporting social diversity. Redeveloping them would likely result in luxury development, causing a net loss of low-cost housing options.

Demolishing existing buildings that already provide large numbers of homes that are in good condition, support amenity and contribute to character and heritage is a waste of resources at a time when building materials and labour are in short supply and there is a need to reduce emissions from the housing sector.

The plan should maintain inter and post war apartment blocks to protect heritage, housing diversity, density and amenity.

Heritage

The proposed plan intersects with the Paddington Heritage Conservation Area, the Woollahra Heritage Conservation Area, the Mona Road Heritage Conservation Area and the Loftus and Mona

Road Heritage Conservation Area. Land covered by the plan includes seven state listed items and 200 locally listed items. It is a region that is highly sensitive to heritage impacts.

While the proposed plan claims not to touch any state or local listed buildings, its impacts on heritage values would be huge.

Existing streetscapes along and between Ocean Street and Edgecliff Road are currently lined with inter war apartments that provide a cohesive urban landscape that tells the story of Sydney's early apartment history. Their contribution to the values of adjacent heritage conservation areas is recognised by WMC plans and the Heritage Assessment Report. The buildings create soft transitions between the Paddington Heritage Conservation Area and the Woollahra Heritage Conservation Area, adding to their local character. The apartments have historic and aesthetic value in their own right.

Inter war buildings must be protected.

Introducing towers around Paddington would severely damage Paddington's heritage values. Paddington is one of the world's most intact Victorian terrace suburbs. Integral to its heritage values are uninterrupted views of the water and sky throughout. If towers line Paddington's surrounds, they would dominate skyline views and block sunlight. Paddington as a heritage area would become an isolated aberration, disconnected from Woollahra. The 23 storey tower proposed at 400 Glenmore Road is particularly problematic. It would see heritage homes throughout Paddington overshadowed, exposing them to deterioration.

Towers around Paddington must be scaled back to protect heritage.

The WMC has submitted heritage proposals that are awaiting gateway determination to respond to community concern about heritage impacts of the uplift planned around the Edgecliff Railway Station, and to recognise the value of modernist buildings, a defining feature of the area's architecture history. These proposals have been established through careful analysis and should proceed to community consultation and inform the precinct plan proposal.

The Heritage Assessment Report recommended against demolishing inter war apartments but that advice is not reflected in the plans. Proposals have been developed without consultation with the Heritage Council of NSW or Environment and Heritage NSW. There is little community confidence that there has been any genuine attempt to protect heritage in this region.

The plan should be referred to the Heritage Council of NSW and the Environment and Heritage NSW office urgently and WMC's heritage proposals awaiting gateway approval should proceed to community consultation.

<u>Heights</u>
The plan relies entirely on towers to deliver housing. While towers can produce large numbers of homes, they can also create significant visual, solar and wind impacts. Towers need to be carefully located in strategic sites like above train stations or within civic centres to protect adjacent homes, businesses, parks and the public domain.

The plan introduces towers across the precinct, into established areas where they would completely overwhelm the region. Towers up to 14 storeys would line Ocean Street, Jersey Road, Forth Street and Edgecliff Street making their streetscapes bulky and intrusive, visible from afar including in Paddington. Towers are introduced adjacent to public parks, low rise buildings on the state heritage register, heritage conservation areas and near the waterfront.

Density done well is not just the introduction of homogenous towers lining streets. Density done well celebrates and builds on existing character, challenges and benefits. It supports low, mid and high rise. The plan is inappropriately skewed almost entirely towards high rise.

Towers need to be scaled back including on Quarry Street, Ocean Street, Jersey Road, Forth Street, Edgecliff Street and Darling Point Road, and at 400 Glenmore Road.

Affordable Housing

While affordable housing would be provided in perpetuity, the provisions are grossly inadequate and can be provided outside the precinct.

The Sydney Plan identifies a severe shortfall in social and affordable housing and recommends provisions of three to 18 percent in Accelerated Precincts. Three percent is the absolute minimum and should only apply to areas where values are too low to yield enough profit to subsidise affordable housing – this is not the case in Woollahra.

Only two sites would provide a 15 percent affordable housing contribution around the Edgecliff Station and only a handful would provide six, five and four percents. Sites required to deliver other public benefit, such as infrastructure, open space or community facilities, would be exempt from affordable housing provisions.

All sites in the Edgecliff Woollahra Precinct must provide a minimum contribution of 15 percent affordable housing.

There is no guarantee that affordable housing provisions would be delivered onsite or even within the WMC local government area. In a plan for 9,400 new homes, dedicating a few hundred dwellings to affordable homes should be easily achieved and mandatory.

Affordable homes must be delivered within the precinct.

Social Impact

For these new homes to be built, existing low and medium cost apartments would be demolished. People will be displaced and won't be able to achieve like-for-like once they are evicted for the demolition. The proposal would result in the displacement on steroids of low- and medium-income earners, elderly people and essential workers on steroids.

This trend is already impacting people across the inner city, inner east and eastern suburbs with developers having little regard for the rights of existing tenants and vulnerable owners.

The government should limit the demolition of existing homes and ensure protections and tenancy pathways are provided to those who may be displaced.

Housing Mix

The stated reason for the proposed rezone is to increase housing affordability through new supply near the city and a new train station. For that aim to be achieved, new homes must be predominantly affordable to owners and renters on low and medium incomes and essential workers.

Most uplift is coming at the expense of existing low and medium cost apartment buildings, and there is a real risk that new homes would be mostly luxury, capitalising on water views in a sought-after precinct, as is the trend for redevelopment in this region.

The proposed dwelling mix would exacerbate the problem because the proportions are based on the number of dwellings not floor space, allowing large luxury homes to dominate space in new buildings, while smaller homes are squeezed into lower floors and podiums. If new buildings spread a few prestigious homes across most of their floor space, uplift would not be justified and the status quo would achieve a better housing affordability outcome.

Controls need to set maximum sizes for new apartments to prevent penthouses and sub penthouses and base dwelling mix maximums on floor space rather than number of dwellings.

Furthermore housing mix *minimums* do not exist for studio apartments, allowing them to be completely excluded. While thirty percent of stock must be studio or one bedroom homes, without a specific minimum for studio apartments, they won't be delivered. The minimum floor space ratio across all R4 zoned homes of 900 square metres would make studio apartments unlikely.

Specific minimum provisions must be set for studio apartments.

The near precinct-wide floor space minimum of 900 square metres is high for inner city studios and one bedroom apartments. Much smaller homes remain popular with apartments of 500 to 900 square metres considered large within sought-after areas like Potts Point and Elizabeth Bay. Most banks don't consider a home too small for lending purposes if it is above 500 square metres, with many providing standard lending rules to homes above 400 square metres. Flexibility is needed to enable genuinely affordable homes to be built within the precinct and protect social diversity. Allowing smaller plans for some homes could help reduce the scale of development.

Consideration should be given to reducing the minimum size of apartments in R4 zoned land.

<u>Trumper Park</u>
Paddington has extremely low levels of green public recreation space compared to the rest of the state, with Trumper Park providing rare supply. Trumper Park is not just any park, it is a biodiversity hub that includes habitat for native flora and fauna, and a genuine nature retreat for inner city residents close to home. Threatened species that live in the park include the powerful owl and microbats.

Trumper Park provides Trumper Oval for team sport matches which is in regular use. There are opportunities for uplift around Trumper Park but it needs to be sensitive to avoid undermining its important recreational and biodiversity services.

Buildings proposed around the park are towers 20 to 29 storeys high – to its north, east and west. The former bowling club site, which is situated on the grassland, adjacent to bushland, would be 29 storeys. At 400 Glenmore Road Paddington on the western side of the park, a 23-storey tower would be built on the ridgeline, exacerbating impacts.

These towers would dominate views from within and cause extensive overshadowing of this vital park throughout the day in winter, undermining the recreational experience including of the oval and harming biodiversity within the gully. Urban density relies on quality open space and recreational experiences to be a healthy housing option.

Towers around Trumper Park need to be scaled back with further work undertaken to establish appropriate heights that protect the park for recreation and biodiversity.

400 Glenmore Road Paddington

The 23-storey tower at 400 Glenmore Road would have additional impacts on public recreation by overshadowing the White City Hakoah community and sporting facility. White City is essential to the health and wellbeing of local residents, providing opportunities to be active and fit. It includes tennis courts, an outdoor pool, basketball courts, football field, gym and children's play. Its role in community health and fitness has been recognised by significant state and Commonwealth government grants.

The tower would overshadow this facility, reducing the health benefits it can support from outdoor sport and recreation while making the facility less attractive to attend.

The tower would overshadow terrace homes across Paddington, making them dark, cold and energy inefficient and reducing their heritage values. Overshadowing impacts would be extensive given the site is on the ridgeline.

The land is located within a floodwater zone and because of the high hazard flood risks, WMC's hydrological experts recommended against rezoning the site. Excavation and construction works would exacerbate flood risks that putting neighbouring homes in Paddington under serious flood risk.

The tower at 400 Glenmore Road must be drastically scaled back to protect White City and heritage homes in Paddington.

Rushcutters Bay Park

Rushcutters Bay Park is an iconic harbour park that provides green open space with water views for residents across the surrounding region including from Paddington, Darlinghurst, Potts Point, Elizabeth Bay, Rushcutters Bay, Darling Point and Edgecliff. It is heavily used and on any clear day is filled with picnickers, sunbathers, joggers, dog walkers, and children using play equipment. It will soon include a youth recreational area.

Housing to the east of Rushcutters Bay Park includes a combination of single dwellings and apartments, nestled within beautiful old growth trees that add to Rushcutters Bay Park's beauty.

The proposed plan includes rezoning the apartments and houses on Darling Point Road to permit towers of 11 to 14 storeys high. Darling Point Road is higher towards the ridgeline than the streets closer to the harbour, exacerbating the visual impacts of towers. The proposed heights threaten to create a wall of development east of the park, altering its natural ambiance. Beautiful old growth trees on public and private property would be destroyed.

Because homes on Darling Point Road have water views, their values would make redevelopment expensive, with new dwellings delivered from uplift likely to be larger and prestigious, attracting multimillion dollar premium prices. Redevelopment at this location would not contribute in any way to resolving the housing affordability crisis.

New open space in the plan is in the form of small pocket parks that are poorly located and configured and would likely provide little public benefit. Protecting existing quality open space, including at Trumper Park and Rushcutters Bay Park would have better outcomes to support new density.

Heights on Darling Point Road should be drastically scaled back to protect Rushcutters Bay Park with rezoning reconsidered in the context of likely housing outcomes being skewed towards unaffordable homes.

Tree Canopy

The Sydney Plan sets a target of 40 percent tree canopy by 2046. Tree canopy is vital to healthy urban areas, providing oxygen, shade, urban cooling, flood mitigation, and habitat for native fauna.

Tree canopy in the WMC local government area is 27 percent and in the Edgecliff Woollahra Precinct, it is 32 percent – higher than the rest of the region but lower than what is needed. Much of the canopy in the precinct is from rare old growth and heritage trees that pull their weight in cover and act as vital green corridors for wildlife linking the harbour with inland green spaces. Mature trees are located on streets and in the private gardens of apartment buildings.

The proposed uplift would require extensive site amalgamation, excavation and disturbance that would result in significant urban deforestation. Conclusions that trees would be protected are not backed by comprehensive analysis and an urban forest and canopy strategy is needed.

If tree canopy is impacted, WMC would suffer an irretrievable setback that new plantings would have limited ability to fix and Sydney would be further from its 2046 target.

Despite mature trees on private land and along streetscapes providing habitat for threatened species, there is no assessment on their biodiversity values or expected impacts from their removal other than very limited survey data. Specific threatened species surveys that cover nighttime sightings are needed, specifically for the powerful owl and microbats.

At a time of rapidly rising global temperature, more extreme weather events and biodiversity collapse, the proposed loss of trees is reckless.

Existing old growth and heritage trees must be protected through an urban forest and canopy strategy that is informed by comprehensive threatened species surveys.

Transport and Traffic

The Edgecliff Woollahra Precinct plan has the potential to be car free or near car free.

The delivery of a new train station in Woollahra will connect more people to the city, Bondi Junction and elsewhere without the need to drive. Expanding the centre at the existing Edgecliff Railway Station and providing a new local centre at the Woollahra station would provide jobs and services close to new homes, reducing the need to use a private motor vehicle. But if excessive car parking is provided, people would keep and use their car, adding to congestion.

The precinct plan’s limit on car parking spaces would see more than 5,000 new cars using the road network. Local roads are already heavily congested especially New South Head Road, but also Ocean Street and Edgecliff Road. With this many more cars, roads would become impossible and rat running through the backstreets of Paddington would increase, eroding residential amenity across the precinct.

Car parking spaces should be further restricted with provisions based on the projected needs of people with disability and people with jobs that require vehicles such as tradespeople and taxi drivers.

The Edgecliff Woollahra Precinct Plan must further limit car spaces for dwellings.

Aged Care

Aged care is an essential service. To achieve the best outcomes for residents, it needs to be close to family and community and a familiar neighbourhood. Aged care in the inner city and inner east is in low supply leaving families with few options to secure appropriate accommodation close to their home. Increased housing density would further increase future demand for seniors' accommodation, particularly given projections of an ageing population.

The Edgecliff Woollahra Precinct Plan proposes to rezone Goodwin Village in Woollahra and St Vincent's Aged Care in Edgecliff for residential housing. The proposal is short sighted and would leave the area underserviced by aged care and retirement living options. If there is potential for more density on land occupied by these facilities, uplift should be limited to increasing aged care and accommodation options.

Rezoning of aged care and retirement living must be ruled out.

Social Infrastructure

While the explanation of intended effects states that the proposed plan would not create the need for new schools in the short and medium term, the region is highly developed and in the long term when new schools would be needed, all land opportunities could be lost. If a new school would be needed, it would only be feasibly accommodated within rezoned land, likely within a mixed-use tower. There are already strong calls in the local community for a new high school to be incorporated within a tower over the Edgecliff Railway Station.

The Edgecliff Woollahra Precinct Plan must set aside land or floors within proposed buildings for future school facilities.

Despite bringing around 22,0000 new residents to the region, no provision has been made to ensure they have access to hospital, emergency and medical services. Indeed, existing provisions would be removed with the Wolper Jewish Hospital rezoned residential. Land needs to be reserved for an increase in demand for health services.

The Wolper Jewish Hospital must be retained and land should be set aside for public hospital, emergency and medical services.

Exhibited Documents

Despite introducing towers of up to 34 storeys in height throughout the region, shadow analyses are limited.

Significant overshadowing is expected over heritage conservation areas, homes, schools, parks, streets and aged care facilities, but there is insufficient information for the community to understand the full extent of the solar impacts.

Plans should be re-exhibited with comprehensive shadow diagrams.

The draft Edgecliff Woollahra Precinct Plan treats this well established, beautiful, highly sensitive region like a greenfield or brownfield site that is flat, empty and isolated. Rezoning shows no evidence of consideration of the complex urban context of the region or the needs of future residents. The plan is irresponsible and destructive and needs substantial changes to reduce bulk and scale.

I strongly oppose the plan and call for a major overhaul.

Could you please work with the Woollahra Municipal Council to reduce targets, prevent overdevelopment and protect existing low and medium cost housing, inter and post war apartments, heritage, open space, biodiversity and amenity?

Could you please ensure this letter is taken as a submission and objection for the purposes of the Department of Planning, Housing and Infrastructure's environmental impact assessment?

Yours sincerely



Alex Greenwich
Member for Sydney