THE PADDINGTON SOCIETY INC
FOR COMMUNITY AND HERITAGE
EST 1964

For the attention of the Hon. Paul Scully MP
Minister for Planning and Public Spaces
Email: office@scully.minister.nsw.gov.au and osec.corro@dpie.nsw.gov.au

11 November 2026

For attention: Ms Kiersten Fishburn, Secretary, NSW Department of Planning, Housing & Infrastructure

Dear Minister Scully and Ms Fishburn,

SSD-94261458 - Shop Top Housing at New South Head Rd and 529-539 Glenmore Rd, Edgecliff

Construction of a mixed-use building comprising retail/commercial floor space and approximately 109 dwellings including 15% affordable housing.

OBJECTION and LACK OF COMMUNITY NOTIFICATION

The Paddington Society (the Society) notes that the local community, including our Society, received no form of notification that this SSDA had been lodged with DPHI.

It is deeply concerning that the 14-day Exhibition Start date of 28 October commenced 2 days before submissions were due for the massive Edgecliff-Woollahra Precinct State-led Rezoning Proposal.

The Society and exhausted members of the community, including those well within the affected areas surrounding this development, were taken by surprise and only found out by chance several days into the already-insufficient period for assessment of the hundreds of pages of documentation.
There appears to have been no letterbox drop and no other form of media notification.

OBJECTIONS ON BEHALF OF THE PADDINGTON SOCIETY

- **We strenuously object to this State Significant proposal.**
- **The Society does not oppose new development or provision of additional dwellings in Edgecliff and Paddington, but we note that these precincts are already the most densely developed parts of the Woollahra LGA.**
- **We do *not* support inappropriate development at an inappropriate scale for its context.**
- **This proposal is completely inappropriate in scale and we believe that it should be refused.**

We note the following as historical background to our comments, concerns and objections:

PLANNING HISTORY for 529-539 GLENMORE ROAD 2014

The Society notes that an application for redevelopment of the 529-539 Glenmore Road component of the current SSD site was submitted to Woollahra Council and to the Joint Regional Planning Panel (The Panel) for determination in 2014.

That application included increasing the maximum building height (HOB) from 9.5 m (3 storeys) to 34m (10 storeys). The proposal also sought to rezone the site to R3 Medium Density Residential.

That Application was not supported by Council, noting that it was:

- Not in context with the character of the surrounding buildings.
- Will not reflect the desired future character of the Paddington Heritage Conservation area.
- Does not provide a suitable built form transition between the site and the surrounding areas.

The Panel *also did not support* the scheme as submitted, but noted that since the site is close to a major transport node, redevelopment of the site to a high density is appropriate despite its location within a Heritage Conservation area.

The Panel noted that an alternative with a maximum height of six storeys *may* be acceptable.

In October 2014 the DPE advised Council that the proposal for 529-539 should *not* proceed to Gateway determination stage, primarily due to the excessive bulk and scale of that 10 storey proposal.

The excessive bulk and scale of the current SSD on the 12 Storey 529-539 Glenmore Road component of the site *significantly exceeds* the *previously rejected proposal* – it is therefore *even more excessive in bulk and scale*, and should again be refused for the same reasons.

PLANNING HISTORY for 135-155 NEW SOUTH HEAD ROAD

The New South Head Road component of the site was included in Council's Vision and Strategy for the Edgecliff Commercial Centre Planning and Urban Design Strategy (ECC Strategy) endorsed by Council in April 2024 and supported on advice of the WLPP in December 2024 and again in February 2025.

Council-approved controls for development on that component of site, were based on a coordinated ECC approach, increasing HOB 9.4m/14.5m = 3/4 storeys to HOB 34m = 10 storeys, including a 2 storey podium.

The Society maintains support for Council's 2025 strategy, revitalising /augmenting the ECC core, reflecting topography, with the tallest building buildings at the crest of the hill at Edgecliff Station, and reducing building heights as New South head Road descends westward, increasing affordable dwelling numbers and housing diversity, and respecting adjacent Heritage Conservation areas of Edgecliff and Paddington.

We note with concern that Council's ECC Strategy has not been formally approved or adopted by DPHI, well over two years after its formal adoption by Council, now also due to the overlapping Edgecliff-Woollahra Precinct State-led Rezoning Proposal.

The State-led Rezoning Proposal may not be in place for over a year and may *never* be in place.

However, if that State-led Rezoning Proposal ever *did* come to pass, the 135-155 New South Head Road site is designated in the current DPHI documents for HOB 43.5m and only 12-13 storeys.

13 storeys exceeds the 10 storeys proposed by Council for the ECC, but would be a far more suitable height transition to the adjacent Cadry's building, the Heritage item on the Glenmore Road corner.

The 26 storey component of the SSD proposal is *twice the Rezoning height proposed by DPHI* and *2 ½ times* above the *maximum height* proposed in the ECC by Council.

It should therefore again be refused for the same reasons*: it is excessive in bulk and scale*

THE SITE & GLENMORE ROAD CONTEXT

- **We note that *no sites* in the Paddington Heritage Conservation Area (HCA) are currently zoned for significant uplift.**

- **The Society maintains support for the current LEP zonings *and* maintaining compliance with the existing LEP and HCA DCP controls.**
- **This SSD application pre-empts future rezoning (which is uncertain), particularly in this part of the LGA.**
- **References to LMR in the application are therefore completely misleading.**
- **This 12 storey building should *not be permitted* on Glenmore Road, it is non-compliant!**

The 529-539 terraces should be retained in accordance with the LEP and Paddington HCA DCP.

- The whole of the terrace house sites and all built fabric should be retained.
- The retention of the existing facades is the worst form of facadism.
- The minimal setbacks proposed above the terrace facades are ineffective and meaningless.
- Excavation and construction of the six basement levels proposed for the new development would almost certainly mean that all of the existing fabric of those terraces would be demolished.
- None of the existing fabric should be demolished.

See comments further below re Traffic, Excavation, Floodin, and Groundwater

- On New South Head Road at this, the most significant gateway into the whole of Paddington, the 26 storey tower would completely dominate and overwhelm the Heritage Cadry's building on the Glenmore Road corner and at the gateway to the Paddington HCA.
- Both towers will overwhelm the adjacent brick single storey cottages at 543-549 Glenmore Road, amongst the oldest buildings in Paddington as well as the adjacent two storey stone building.
- The towers would dominate all of the views northward down Glenmore Road, including from Trumper Park and oval and the majority of the uplands beyond.
- On the axis of Cascade Street, it would be highly intrusive, dominant and inappropriate in the HCA.
- Existing dwellings on Glenmore Road, Walker Avenue, Artlett Street and South Street will be overshadowed; many of these dwellings are on tiny sites with minimal private open spaces; their solar access must not be reduced.

<u>TRAFFIC including ON-SITE TRAFFIC MANAGEMENT, INGRESS & EGRESS</u>

As the gateway to a dense urban area, traffic movements around and through the Edgecliff Paddington area is often already a challenging experience. The additional traffic generated by this development will add to those challenges in navigating our narrow and winding streets.

- Vehicular access to and from the site is of great concern, requiring some unworkable manoeuvring.
- It is unclear how access and egress via Basement B1, and connecting to B0, will be workable, particularly for large service and waste collection vehicles etc, which will all require regular access.
- These are indicated to be managed by reversing onto the site via the proposed narrow access route to and from Glenmore Road along the southern site boundary with a tight turn into the basement.
- It is difficult to believe that such repeated manoeuvres can be proposed without major disruptions to existing traffic movements each way on the single lane road access into and out of Paddington.
- Large vehicles would need to cross into the opposite side of both the road and the access driveway.
- Glenmore Road access and egress to and from New South Head Road is presently already compromised and frequently grinds to a stand-still on the single lane in from the east and out towards the west, with build-up and extensive backlog of queuing vehicles in both directions already causing disruption due to the many heavily trafficked intersections along New South Head Road.
- Most intersections are recorded in previous traffic studies to be already at or near capacity, not only during weekday morning and evening peak and school pick-up periods, but also during weekends.

CUMULATIVE TRAFFIC IMPACTS

In common with previous SSD proposals, this proposal fails to address the cumulative traffic impacts of adding some 109 additional apartments and numerous commercial spaces into this precinct.

It is difficult to believe that the 86 car spaces alone will only generate 3 incoming vehicle movements and 10 outgoing movements during the AM peak or the 8 incoming and 2 outgoing during the PM peak.

It is even more difficult to comprehend of believe the Modelling Scenarios which include that:
"to account for future traffic conditions, including the cumulative effects of committed and anticipated development within the locality, a standard background growth rate of 1% per annum has been adopted for the future year assessments."

With the multiple new SSD developments already approved and in the pipeline for approval in the Edgecliff / Woollahra precinct and the LMR and SSDs in the system further afield in Double Bay and Rose Bay, the above stated anticipated cumulative traffic growth conditions are patently inadequate.

CAR PARKING PROVISION

The amount of residential car parking provision in the basements (86 car spaces) is questionable, particularly given the proximity of the site to the transport node of Edgecliff Station and the bus interchange. Both of these provide frequent public transport service connections to Bondi Junction, the CBD and many directions further afield.

- The frequency, variety and regularity of such services are amongst reasons for Transport for NSW recommending rates of parking relating to the high accessibility of a site, which for this site is Category 1A, including Edgecliff, parts of Double Bay-Darling Point.
- Category 1A for dwelling numbers and the dwelling mix proposed indicates a recommended provision of fewer than 70 spaces, indicating that one or more basement levels could be deleted for the proposal.

DEEP SOIL, LANDSCAPING and COMMUNAL OPEN SPACE

The deep soil provision on the amalgamated site is negligible, totalling just 22.33 sqm = 1.2% of the total site area; that figure includes 16.55 sqm of permeable paving and just 5.78 sqm of actual deep soil !!

- Narrow fringes of landscaping groundcovers are provided at the Level 10 and rooftop terrace level to soften the curved perimeter building line, with a small circular planter for "small trees"
- The proposed landscaping is minimal and limited in providing meaningful amenity.

COMMUNAL OPEN SPACE

Accessed by a flight of steps from Glenmore Road and a narrow walkway from New south Head Road, this does not appear to be complaint with the Apartment Design Guide.

- It will be in shadow for significant parts of the year and the landscaping proposed is minimal.

OVER-SHADOWING

- As noted above regarding the Glenmore Road context, existing dwellings on Glenmore Road, Walker Avenue, Artlett Street and South Street will be dramatically overshadowed; many of these dwellings are on tiny sites with minimal private open spaces; their solar access must not be further reduced.

- The existing mid-rise Wimbledon apartment buildings accessed via Glenmore Road and New McLean Street directly to south and south-east of the site will receive significant overshadowing from the combination of the two tower blocks in this SSD proposal, despite the applicant's claimed effort to provide sunlight via the space between the towers.
- Habitable rooms, private open spaces, landscaping and tree canopy will all be detrimentally affected.
- Those apartment buildings are under threat from traffic and road access proposals of the State-led Rezoning proposals - and re-zoning may not eventuate – plus overshadowing therefore remains of concern.
- Significant parts of the tree canopy and Trumper park will also be overshadowed.

We also note that shadows from the 26 storey Tower will cast shadows onto the roof and solar panels of the Glenmore Road tower, compromising their effectiveness and viability.

Solar access to the strata apartments at 161 New South Head Road will also be severely reduced, with only 35 of the 68 apartments receiving 2 hours of midwinter sunlight.

Potential future redevelopment of that site is presently not anticipated and the owners and residents of those apartments will not be cheered by such unrealistic claims.

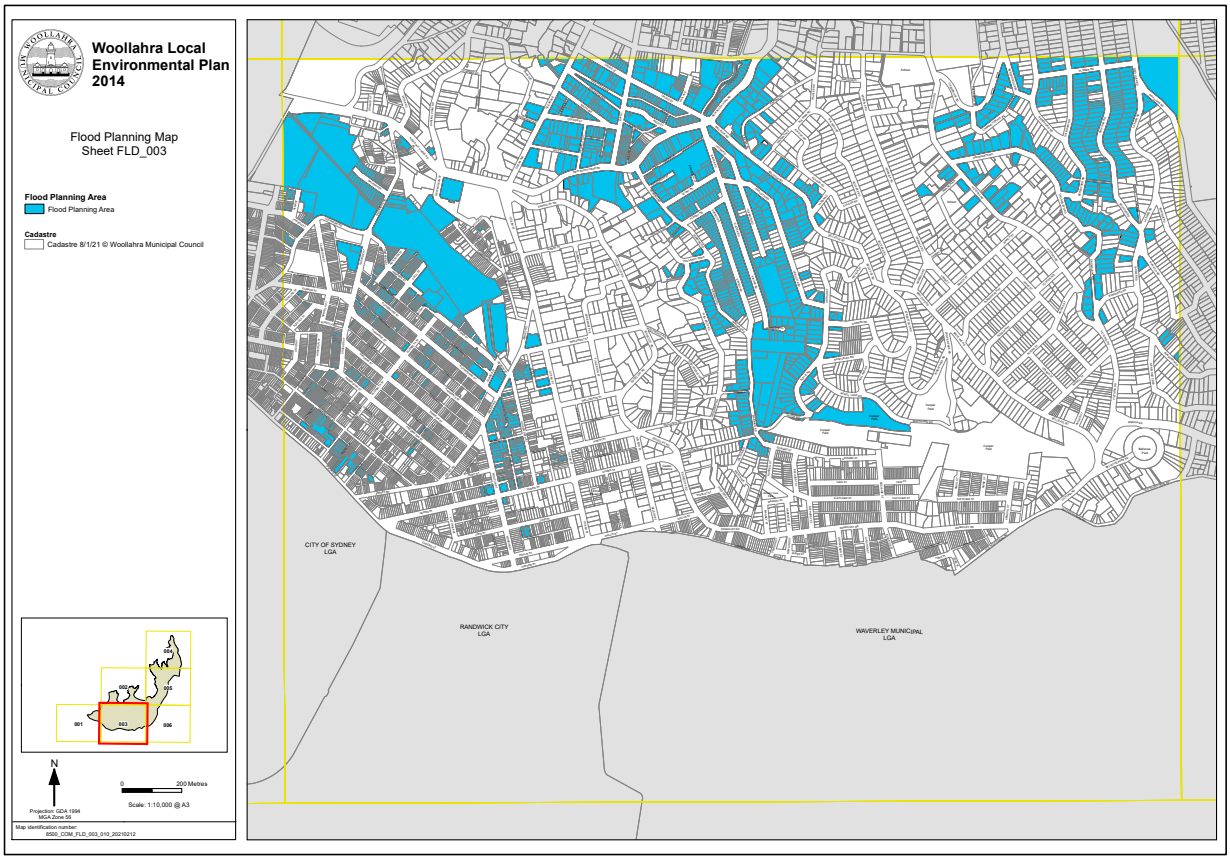
EXCAVATION

- Basement excavation will require ongoing groundwater pumping, which will increase environmental impacts, plus additional risks to adjacent and surrounding properties.
- Owners and residents in the flood affected zones in Paddington are extremely familiar with ongoing flooding problems, already exacerbated by ever increasing loss of deep soil, basement excavations for carparking, all diverting groundwaters to adjacent, surrounding and downstream sites.
- These problems are in addition to deficiencies in existing ageing and insufficient stormwater drainage, infrastructure and degraded sandstone typical in this precinct.
- The Geotech report notes that excavations will be "about 2 to 8 m below the ground water table"
- This is a significant concern in this flood zone.
- Terraces and even older dwellings were developed on uneven and frequently degraded quarried sandstone foundations, with inadequate - or in some cases - no footings - and certainly without waterproofing at foundation levels.
- The Geotech report also notes that excavation "is anticipated to undermine the foundations of the terrace houses" and that underpinning may need to be considered. Together with the tanking and groundwater diversions noted above, the deep basement excavations are highly problematic.
- Council experiences elsewhere in Double Bay and Rose Bay have revealed the risks of basement excavations and groundwater impacts in fragile, vulnerable flood prone areas.
- **The Society believes that these have not been properly assessed and are additional grounds for refusal of this proposal.**

FLOODING

It is important to record that the development site is in a high flood risk zone, clearly illustrated in WLEP 2014 – Flood Planning Map sFLD_003 (attached below)

- The applicant's claims regarding flood risk are incorrect and understated.
- The EIRS notes that the site is "not flood affected" and the application flood report incorrectly notes that the Glenmore Road frontage is in "Council's low and medium flood risk precinct"
- The minimal, negligible deep soil provision and 6 levels of basement excavation which will require tanking, will exacerbate diversion of flood and groundwaters to properties adjacent, further downhill and well beyond, all of which are already in high flood zones as is evident on the LEP Flood Planning Map.



IN SUMMARY:

Although this SSD proposal claims benefits from many of the recent DPHI planning initiatives, including the very recent, not yet assessed or determined or in-force Edgecliff-Woollahra State-led Rezoning Proposal.

The bulk, height, form and scale of this SSD is inconsistent with - and radically contravenes - the specific Height of Buildings Zonings as existing *and* as proposed, although not yet in force

The 12 storey tower with its 26 storey companion are far too high and inappropriate in the New South Head Road streetscape and the Paddington Heritage Conservation area.

The development proposes greater floor space ratios, excessive building heights, and, in practical effect, demolition of the six contributory terrace buildings adjacent to the heritage cottages in Glenmore Road and the heritage Cadry's building.

The visual impact statements do not properly or adequately consider this change of scale, and the traffic and cumulative traffic predictions are patently inadequate

The seven storey MONA development directly opposite on the Mona Road / New South Head Road corner - designed by the same architectural team - could be an appropriate model for this site.

The Paddington Society's objections and concerns regarding the proposal are based on all of the above, and we request that the application be refused.

Yours faithfully

Esther Hayter

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