Harriet Price
Councillor – Paddington Ward

Woollahra Municipal Council

30 October 2026

Hon Paul Scully MP
Minister for Planning and Public Spaces
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Dear Minister

The Woollahra Edgecliff State-Led Rezoning

I make the following submission in my capacity as a Councillor. My submission is based upon my knowledge of and involvement as an elected Councillor on Woollahra Municipal Council for the past 9 years and as a Paddington resident for the past 21 years.

From the outset, I want to make it clear that I support the delivery of additional housing in the Woollahra Local Government Area (LGA) and recognise the need to respond to the current housing affordability crisis.

I have worked closely with members of the community directly impacted by the Rezoning Proposal (the Rezoning) to better understand their circumstances and concerns. During the exhibition period, I have also attended and hosted a number of community forums and feedback sessions to answer questions, listened to concerns and encouraged the community to lodge a submission.

On 30 September 2026, I attended an Extraordinary Council Meeting and proudly voted to endorse Council's excellent and very thorough submission (Council's Submission). I proposed a number of amendments to the draft of Council Submission and secured meaningful amendments to strengthen it.

My submission is intended to complement rather than duplicate Council's Submission by highlighting key community concerns informed by my engagement with residents and my knowledge of the local area. It should not be regarded as an exhaustive assessment of the Rezoning, nor should the absence of comment on any particular assumption or supporting technical study be construed as acceptance or endorsement.

The Rezoning target of 9,400 dwellings is excessive and does not reflect the physical, environmental and heritage constraints of the precinct. Council Staff and elected Councillors have detailed knowledge of local conditions, the infrastructure constraints and community needs.

Housing targets can be established by the State, but Councils should retain the primary role in determining how and where growth is accommodated through locally informed planning processes. To this end, Council's has developed an Alternative Approach, indicating a capacity for up to 3,600 new dwellings. This Alternative Approach should form the basis for future planning.

Key Community Concerns

<u>The Exhibition Period</u>

The very limited exhibition time period has not provided a reasonable or practicable opportunity to undertake a thorough assessment of the Rezoning and its extensive supporting technical materials.

Despite this, the community has nonetheless made a determined effort to understand the Rezoning and prepare informed submissions. Corflute posters distributed by Council, encouraging participation, have been proudly displayed throughout the Municipality - affixed to the palisade fences, timber cottage gates, sandstone pillars as well as on the front doors of interwar apartment buildings.

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We acknowledge the Gadigal and Birrabirragal people who are the traditional custodians of this land and we pay our respect to Elders past and present.

These grassroots efforts have helped raise awareness, share information and mobilise the community. Neighbours have helped one another to prepare submissions and navigate the technical requirements of uploading them. For many, this has been a daunting process. I have been genuinely impressed by the generosity, persistence and willingness of neighbours to support one another and ensure that more voices can be heard.

Community Sentiment

In my discussions with the community, many have described feeling overwhelmed, anxious and confused by the Rezoning. The community cannot understand how an additional 10,000 new dwellings can be accommodated in an already dense and congested neighbourhood.

Of particular concern is that many relatively affordable interwar apartment buildings, including rented studios and one-bedroom apartments, will be demolished and replaced by luxury high-rise towers. Residents are concerned not simply about the scale of change, but about whether the Rezoning will retain the housing choices that enable a diverse community to continue living in the area.

The community holds a deep attachment to our highly regarded heritage conservation areas (HCAs). The community value not only individual heritage buildings, but also the cohesive streetscapes and mature tree canopy that define our neighbourhoods' distinctive character.

My engagement with the community has revealed overwhelming support for protecting this local heritage and retaining its diverse mix of housing – particularly our dwindling supply of relatively affordable homes. Ultimately, as my submission will outline, the Rezoning in its current form fails to adequately protect either and should not proceed.

The Technical Documentation

The volume and complexity of the public exhibition material is overwhelming and for many residents intimidating. Whilst the Explanation of Intended Effect (the EIE) provides a high level summary, it is difficult to reconcile with the extensive technical studies and appendices that accompany it. I have attempted to reconcile the EIE with the information and assumptions contained in the supporting documents. Critically, many of the key recommendations from the technical studies have not been incorporated into the planning material used to support the Rezoning.

The Pressure to Sell

Some of my constituents have reported approaches by real estate agents, developers and other interested parties seeking to secure properties on sites identified for substantial uplift. Some owners have spoken to me about feeling pressured to 'sell up' and fear being ostracised if they choose to remain in their home. Many feel 'rattled' and unsettled by the underlying uncertainty created by the Rezoning.

What's the Point?

Regrettably, many residents have also expressed doubt that their genuine concerns, questions and objections will meaningfully influence the outcome. To restore confidence in the process, the Government must demonstrate how submissions have been considered, explain how substantive concerns have been addressed and identify what changes have been made in response before any final decision is made to finalise the Rezoning.

Housing Diversity and Affordable Housing

Any Rezoning must deliver genuinely affordable housing outcomes and a diverse housing mix. Controls should encourage smaller dwellings, set limits on oversized luxury apartments and ensure the retention (as well as delivery) of studio and one-bedroom homes.

Council estimates that the Rezoning may affect a loss of 500 smaller sized one-bedroom and two-bedroom units. These units contribute to the existing diversity and relative affordability of housing within the precinct. [Council Submission p.27]

In addition, although the Rezoning provides for a broad based affordable housing contribution of 3% in perpetuity (as well a contribution rate of between 4% to 15% on some key sites), these rates are only expected to deliver 144 affordable housing dwellings over a 20 year period. [Council's Submission p.45] In addition, the maximum 15 % contribution applies to just 2 key sites. Having regard to the scale of the uplift proposed, the affordable housing delivery is woefully inadequate (a mere 1.5%).

Concerningly, the affordable housing contributions may be satisfied either through the actual delivery of floor space/units or via an equivalent monetary contribution [EIE p.17]. It is most concerning that there is no requirement for affordable housing contributions generated within the Precinct to be delivered within the rezoned area or even with the Woollahra LGA.

Overall, there is a real risk that the Rezoning will reduce rather than improve housing diversity and overall housing affordability. Furthermore, redevelopment of existing affordable and medium-cost apartment buildings risks displacing tenants and disrupting established community connections. There are no measures in place to minimise displacement and maintain access to local services and support networks.

Affordable housing contributions should reflect the value uplift created by rezoning. A stronger affordable housing requirement should apply across the precinct, with affordable housing delivered on-site and within the local government area.

Furthermore, the complete omission of any strategy or provision for social housing is a major omission and lost opportunity to help permanently house our most vulnerable community members.

Heritage and Local Character

The suburbs of Paddington, Woollahra, Darling Point and Edgecliff form a distinctive urban area of outstanding heritage significance. Conserving that significance should be a fundamental objective of the Rezoning, shaping the location, scale and form of any additional development, rather than being treated as a matter to be resolved after increased development capacity has been established at the development application stage.

The EIE states that the Rezoning:

'… aims to accommodate future growth while conserving the area's important heritage values.' [EIE p.18]

The Heritage Assessment Report prepared by GML Heritage with Warren and Mahoney (HAR) underscores the importance of that commitment. It describes an extensive and sensitive historic environment encompassing State and locally listed heritage items, multiple HCAs, contributory buildings, intact historic subdivision patterns, cohesive streetscapes, mature landscapes and important topographic relationships. [HAR p.i] These HAR accurately observes that these interrelated qualities require a precinct-wide approach to heritage conservation and protection.

While the EIE refers to only three HCAs, the HAR correctly identifies all of the following HCAs within the Rezoning Area:

- Darling Point Road HCA;
- Lotus Road and Mona Road HCA;
- Mona Road HCA;
- Paddington HCA; and
- Woollahra HCA. [HAR p.13]

The HAR also recognises the substantial body of heritage information contained in Council's commissioned studies. Those studies identify additional potential heritage items and at least one potential HCA that must inform any rezoning-led increase in development capacity [HAR p.15]. The HAR further identifies nine properties within the precinct that are subject to planning proposals for local heritage listing.[HAR p.21] The EIE and the DG materials do not take account of identified potential heritage significance as well as existing listings.

Against this background, it is particularly concerning that the HAR records 'no consultation' with the Heritage Council of NSW or Heritage NSW. [HAR p. 26] Consultation with those bodies must inform the planning process before development controls are finalised or development applications are lodged.

I am also concerned that the DG does not articulate how heritage constraints have determined the proposed heights, FSR and development footprints. Site-specific assessment cannot substitute for a sound strategic decision about whether the scale of development enabled by the Rezoning is appropriate in the first place. Nor does it adequately address the cumulative effects of redevelopment across multiple sites.

Trumper Park

Trumper Park provides a clear illustration of these concerns. The HAR recognises Trumper Park as a sensitive heritage interface and calls for a carefully managed, heritage-led response to any increase in uplift. It emphasises the need 'for 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.' [HAR p.104] The HAR also warns of risks of visual dominance, loss of setting and diminished landmark presence. [HAR p.10]. It also emphasises Trumper Park's role as an open-space setting and buffer to the Paddington HCA as well as the need for development along its southern and eastern edges to remain clearly subordinate to the low-scale historic fabric to the north. [HAR p. 107] The Rezoning must explain how the proposed heights satisfy that principle. On the materials presented, I do not consider that compatibility has been demonstrated. The following proposed heights around Trumper Park are a stark example of this incongruous approach:

- 27 storeys at 400 Glenmore Rd; and
- 23 storeys at the Quarry St Site.

Such extensive uplift is impossible to reconcile with the HAR advice. Both sites must be removed from the Rezoning or alternatively, significantly reduced in height and scale.

Moreover and across the entire Rezoning area, I am concerned that important recommendations made in the HAR have not been translated into the proposed heights or FSRs envisaged by the draft Design Guide (DG).

Inter-War Flat Buildings

Existing inter-war and post-war apartment buildings make a significant contribution to housing diversity, affordability and local character in the area. The HAR recognises that: '… these buildings contribute to streetscape identity, landscape setting and the transition

between lower-scale detached housing and more intensive postwar or contemporary development.' [HAR p.41] These buildings are an important part of the precincts urban history and already provide medium-density housing close to jobs and transport. These building types should be retained wherever possible rather than replaced by large-scale redevelopment.

The HAR importantly also recognises that:

'… retention can also be positive from a sustainability perspective, as these buildings embody materials and energy that may otherwise be lost through demolition and replacement. In many cases they are robustly constructed.' [HAR p.42]

The Visual Impact Assessment

The Visual Impact Assessment (VIA) does not adequately demonstrate the effects of the proposed development on heritage items, significant public views, HCAs or the wider heritage setting. This is a significant gap in the evidence needed to assess the Rezoning. A clear account of how each substantive heritage recommendation has been addressed, supported by an integrated assessment of visual and heritage impacts, must be performed.

Cultural Heritage

The Country Cultural Assessment Report (CCA) notes that further engagement is required before several matters can be treated as finalised. These further matters include:

- Engagement with the La Perouse Local Aboriginal Land Council and the broader Aboriginal Community; and
- Reviewing concept and detailed designs against the cultural sensitivity mapping and design themes as they are produced [CCA p.2]

In 2021, Council endorsed the Woollahra Aboriginal Heritage Study, which identifies Aboriginal heritage sensitivity of land across across the LGA. The site of the Woollahra Station is bordered along its western edge by the cliff and is identified as an area of Aboriginal Heritage Sensitivity. Given the significant uplift proposed for this area, more in depth research of the area is required to ensure the risk of damage to any Aboriginal heritage is minimised.

Overall, from a Hertiage perspective, future growth must respect the existing urban form, heritage assets, landscape settings and the existing neighbourhood character. In my view, the Rezoning in its current form fails to demonstrate that it can achieve its stated conservation objective. Its proposed scale is incompatible with the heritage significance and character of the area and has not been adequately addressed.

The Rezoning cannot proceed in its current form. Any revised proposal should be heritage-led, informed by consultation with the relevant heritage bodies and supported by controls that demonstrably protect both individual heritage places and the wider conservation areas. Conservation must shape the development outcome, not be left to mitigate the consequences of excessive development capacity after Rezoning.

Draft Design Guide

The exhibited documents include a draft Design Guide (DG). The DG supports the implementation of the proposed planning controls and will inform the preparation, assessment and determination of future development applications. [DG p.3] Crucially, the DG provides the key objectives to help guide future development within the precinct. The overarching objective is:

'… promote compact, walkable, character-sensitive neighbourhoods with integrated transport, strong heritage and landscape protection and increased, diverse housing supply'.[DG p.7]

The Rezoning framework fundamentally fails to meet this objective. Rather than fostering a character and heritage sensitive neighbourhood with landscape protections, the proposed controls operate to restrict the diversity of housing types, disrespects heritage and the established urban canopy. By failing to align the proposed development controls with these core principles, the Rezoning completely undermines the strategic vision of the DG.

Building Heights

For good reason, the Municipality currently contains no land zoned 'R4 High Density Residential'. The introduction of an entirely new residential zone represents a significant policy shift with implications extending beyond the precinct. In most instances the proposed R4 Zoning is inconsistent with the intended future character, exisiting development capacity and existing use of the land.

There are many instances where the proposed building height controls as well as floor space ratios do not accurately reflect the development outcomes envisages by the rezoning framework. In many instances, the proposed controls do not take account of sire-specific constraints, including topography, basement requirements on challenging sites and site access arrangements. There is also no adequate analysis of the impacts of these new building heights on solar access, overshadowing and open space amenity. The implications of the proposed new built forms on recreational amenity, park usability and landscape character are also largely ignored.

There is no adequate analysis on how key public open space will retain adequate solar access to support passive recreation, sporting activities, turf performance, vegetation health and user comfort. There is also no consideration of visual enclosure, perceived openness and the cumulative impact on the character and amenity of exisiting public open spaces and in particular, Trumper Park and the Lough Playing Fields.

Moreover, the Biodiversity Assessment (BA) does not address the effects of overshadowing arising from the height and close spacing of the proposed buildings. The availability of sunlight will have impact on retained, influencing their crown density, future growth, canopy distribution and long term viability.

Excessive heights will dominate existing streetscapes, create visual impacts and undermine the character of established neighbourhoods. Building heights must be reduced and better aligned with local context.

Tree Canopy and Biodiversity

The precinct's mature tree canopy and habitat connections are substantive environmental assets that should shape the Rezoning, rather than be treated as matters to resolve after development capacity has been established. I am most concerned that the scale of redevelopment proposed risks substantial canopy loss and habitat fragmentation without an adequate precinct-wide assessment of the consequences.

The community is particularly concerned about the Powerful Owl and the protection of its habitat. The assessment should clearly identify the mature trees, potential nesting and roosting sites, prey habitat and connections that support this species, rather than assume that isolated patches of retained vegetation will be sufficient.

Replacement planting should not be treated as an immediate or equivalent substitute for established trees. The assessment must account for the time needed to restore canopy and habitat functions, including the availability of hollows, and explain how ecological values would be maintained during that intervening period.

The field survey and dataset underpinning the Biodiversity Assessment (BA) is problematic. The survey is confined to public trees and excludes trees on private land, which the BA assigns by default to a 'low-value' category [BA p. 48]. Council has identified that approximately 84% of direct vegetation impacts will occur on private land. [Council's Submission p.4]

Accordingly, the BA understates the ecological value of the vegetation most exposed to redevelopment. The BA does acknowledge that values on private land 'may be underrepresented' and calls for site-specific assessment at the development application stage. [BA p. 47]

The exhibited material does not provide sufficiently 'ground truth' inventory of trees across affected public and private land, including their species, canopy condition, habitat features and the presence of hollows. Without that baseline, conclusions about the extent and significance of potential loss cannot be regarded as adequately substantiated.

I am most concerned that deferring these questions to individual development applications risks a fragmented, site-by-site response that overlooks the precinct's ecological connectivity. Site-specific assessment remains necessary, but it cannot substitute for the strategic assessment needed to determine appropriate development capacity and identify areas where vegetation retention must take priority.

The BA also does not clearly identify whether trees on Council's Register of Significant Trees, or trees individually listed as heritage items, would be affected or removed. These trees and their protection requirements should be mapped against the proposed building envelopes and access arrangements. Their retention may materially constrain the scale and footprint of development and must therefore inform the controls before they are finalised.

The DG identifies an objective of 'enabling heritage-led density' for the Woollahra Station Block within the Woollahra Centre Character Area.[DG, p. 57] It is challenging to reconcile this objective with the addition of proposed towers of up to 30 and 32 storeys within this precinct. The trees identified at 66 Wallaroy Road and along Rosemont Avenue, Ocean Avenue and Cooper Street should be expressly addressed, with their listing status, protection requirements and implications for development capacity confirmed.

The DG appears to place greater emphasis on future planting than on securing the retention of existing mature trees. A credible greening strategy should begin with avoidance of unnecessary loss and demonstrate that retained trees will have sufficient space and suitable conditions to remain viable alongside the proposed development.

Alarmingly, Rezoning would intensify development across an area whose habitat connections extend between Trumper Park, Cooper Park, Harbourview Park, Centennial Park and Sydney Harbour. The assessment should examine how redevelopment would affect those connections, including the combined effects of canopy removal, increased building bulk, artificial lighting and changes to the spaces through which fauna move. Potential urban heat impacts should also be assessed alongside the proposed loss and replacement of canopy.

In particular, potential vegetation clearance around the proposed Woollahra Station Site requires a detailed assessment of the area affected and its habitat value. The 'low value' classification should not be accepted without adequate survey evidence and an explanation of how both direct loss and reduced connectivity have been evaluated.

<u>SSROC Mapping</u>

There also appears to be a discrepancy between the BA's mapping and the Southern Sydney Regional Organisation of Councils (SSROC) Connected Corridors mapping. Areas assigned 'low' or 'vert low' biodiversity value in the BA overlap with areas identified as

'supporting habitat' or supporting areas in the SSROC mapping. These categories may reflect different methods and purposes and should not be assumed to be directly equivalent. Nevertheless, the difference requires an explicit explanation, including how the BA has accounted for the contribution of these areas to the wider habitat network.

Existing vegetation should be assessed for its actual ecological function, not discounted solely because it occurs on private land or includes non-native species. The assessment should establish whether individual trees and planted areas provide shelter, foraging opportunities or connections used by native fauna.

Overall, the Rezoning cannot be finalised without targeted ecological surveys and a precinct-wide assessment addressing threatened species, habitat trees and movement corridors, supported by appropriate investigation of affected private land. The assessment should consider proposed building heights, lighting, canopy loss and altered movement routes. Reliance on desktop information and later development application assessments is insufficient to resolve these strategic questions.

I fully endorse the recommendations in Council's excellent Environmental and Sustainability Response. The final planning framework should identify enforceable tree-retention and habitat-connectivity requirements, measurable canopy outcomes and responsibility for monitoring their delivery.

Until the survey gaps and cumulative impacts have been adequately addressed, I do not consider that the Rezoning has demonstrated an acceptable biodiversity outcome.

The Pedestrianisation of New McLean Street

I fully endorse Council's critique of the exhibited Transport Management Accessibility Plan (TMAP) and its recommendations.

My constituents are particularly concerned about the proposed pedestrianisation of New McLean Street, Edgecliff, and the implications for access to their homes, businesses and transport facilities.

The TMAP proposes a new plaza near New McLean Street and the closure of the street to vehicular traffic. The Urban Design Report (UDR) appears to depict a connection extending west towards or into Trumper Park, although the nature and alignment of that connection is unclear [UDR, pp. 92 and 97]. The exhibited material also proposes that Council create a new road link between Ocean Street and Glenmore Road to maintain local access. These proposals need to be explained together, with a clear distinction between pedestrian connections and vehicular routes.

New McLean Street currently performs several important access functions. It provides access to and egress from the Edgecliff Centre car park, serving Aldi, Coles and other shops and commercial premises, as well as access to loading facilities. It also accommodates a passenger pick-up and drop-off point for Edgecliff Station.

Any closure must therefore demonstrate how these functions would be maintained, including access for residents, deliveries and people who rely on vehicle-based access to shops or public transport. The creation of a plaza cannot be assessed in isolation from its consequences for the operation of the commercial centre and the surrounding street network.

On the exhibited information, it is difficult to determine the alignment of the proposed replacement road, the land required or how it could be delivered. In particular, it is unclear whether it would affect existing homes or require the use of land within the upper section of Trumper Park. These are fundamental questions about the feasibility and consequences of the transport strategy, not matters of detail that should be left unresolved until after the Rezoning.

The Government's stated position that there will be no compulsory land acquisition makes clarity about delivery especially important. If the proposed road requires land that is not already available for that purpose, the Government must explain how it would be secured without compulsory acquisition and what would happen if the necessary owners did not agree to sell. That assurance should be supported by an identifiable and practicable delivery pathway, rather than leave residents uncertain about the future of their homes or the protection of public parkland.

Until these matters are resolved, I do not consider that the pedestrianisation proposal has been adequately justified or shown to be deliverable.

The creation of 'Glenmore Road Park'

Many of my constituents have expressed concerns about the proposed public open space at 400 Glenmore Road, identified as 'Glenmore Road Park'. The proposal appears to involve land adjoining the privately owned former White City site and the Weigall Sports Grounds. The exhibited material does not clearly establish the park's boundaries, the ownership of all land required or the mechanism by which it would be secured as permanent public open space. These matters must be distinguished from the separate question of securing public access through adjoining private properties.

The recreational value of the proposed park also requires closer examination. Its size, configuration, gradients, accessibility and solar access should be assessed against the activities it is intended to accommodate and the needs generated by additional residents. The site's drainage function, mature trees and established landscaping may constrain its usable area and require careful protection and management.

The Urban Design Report (UDR) also depicts a walking and cycling corridor connecting the proposed park through the Weigall Sports Grounds and parts of the former White City site. Council previously investigated a shared 'Greenway' path, linking Trumper Park with Rushcutters Bay in this area. The Greenway did not proceed for a number of reasons, including that the private landowners were not prepared to agree to public access through their properties. Unless circumstances have materially changed, the same delivery constraints are likely to remain.

Paddington Bowling Club

Many in the community are also concerned about the treatment of the former Paddington Bowling Club Site. The Rezoning references this site as part of its broader recreation and open space response. However, the site is privately owned by the La Perouse Local Aboriginal Land Council following the successful determination of an Aboriginal land claim and transfer of title in January 2026. The Rezoning does not establish a clear mechanism by which this land would become publicly accessible open space capable of meeting the recreational needs generated by the Rezoning.

This 'aspirational' use of privately owned land should not be presented as a secured public benefit or relied upon to justify additional development capacity, without a credible delivery pathway. This critique applies to much of the proposed public open spaces throughout the Rezoned areas.

Aged Care Facilities and the Wolper Jewish Hospital

Many in the community are shocked by the increased development capacity proposed for existing aged-care sites, including Goodwin Village on Jersey Road, Woollahra and St Vincent's on Albert Street, Edgecliff. These sites accommodate essential services whose continuing availability should be a central consideration in planning for the precinct. I appreciate that increased development residential capacity does not necessarily mean that these important facilities will close, but the Rezoning must demonstrate how existing care accommodation and services will be protected if redevelopment does occur.

The demographic context makes this especially important. The population is ageing, with both the number and proportion of older people expected to increase. The Rezoning should support a continuum of accommodation and care, including residential aged care and accessible rehabilitation, rather than assume that additional apartments can replace these much needed services.

Residents have conveyed to me how highly valued these facilities are and how important it is to obtain appropriate care close to home. The potential loss of local capacity raises serious questions about where people would receive equivalent care, whether it would be affordable and accessible and whether alternative providers could accommodate displaced demand. Moving care further away can also make regular visits and practical support from family and friends more difficult.

The Wolper Jewish Hospital (Wolper) is another important part of this local care network. Its services include inpatient rehabilitation, day rehabilitation and allied health services. Its rehabilitation for older people provides short-stay restorative care for patients with complex medical needs, while its day programs enable patients to receive multidisciplinary rehabilitation without an overnight stay. These services have a different function from residential aged care and are complementary to it.

Many of my constituents speak very fondly of the rehabilitation sand care they have received at Wolper and the value of being able to access treatment locally. Disruption or relocation could make attendance more difficult for patients and increase the practical burden on those who assist them.

Overall, the Rezoning has not considered continuity of care, access to specialist staff and facilities or the relationship between inpatient treatment, day rehabilitation and ongoing community support. These deficiencies must be addressed.

Other Basics - Utilities

The Utilities Infrastructure Servicing Report (UIS) raises fundamental questions about whether the proposed growth can be supported by essential utility infrastructure. Its conclusion that the Rezoning could 'potentially' be serviced is not equivalent to confirmation that sufficient capacity exists or that the necessary upgrades can be delivered when required. My concern is that the assessment relies heavily on broad assumptions and preliminary engagement with utility providers. Although it identifies a number of upgrades, it does not provide sufficient certainty about their funding, timing or coordination with redevelopment.

<u>Sydney Water</u>

Concerningly, the UIS states that its findings and recommendations concerning Sydney Water are based on 'limited early engagement' and 'high-level assumptions pending further detailed investigations'. [UIS p.4]. These qualifications indicate that important aspects regarding actual capacity of the network remain unresolved. These fundamental investigations cannot be treated as matters for later investigation.

It is particularly concerning that the UIS identifies the existing Woollahra Reservoir (which currently services most of the Rezoning area) as having 'limited capacity and is considered unsuitable for servicing any of the proposed uplift.' [UIS p.10]

The scale of 'indicative' utility upgrades are substantial. The UIS identifies approximately:

- 23.7 km of pipe for the sewer reticulation network; and
- 17.5 km of pipe for the portable water reticulation network. [UIS Appendix C].

These upgrades with be hugely expensive and reinforce the need for a coordinated delivery program, with clear responsibilities for funding arrangements. The community needs to understand not only what infrastructure is required, but also how it will be

funded, how construction would be coordinated with redevelopment and how disruption to existing residents and businesses would be managed.

Bondi Ocean Outfall Sewer

The Bondi Ocean Outfall Sewer (BOOS), which passes through part of the precinct, presents a further significant constraint [UIS, Appendix A, p. 1]. The UIS rightly identifies the BOOS as a State heritage-listed asset more than 100 years old and that:

'Any development over the top of this asset is likely to be significantly restricted to ensure the integrity of the asset is maintained.' [UIS, p. 7] [My emphasis]

Alarmingly, the proposed development controls and the DG do not in any way address or acknowledge this issue described in the UIS itself as a 'Key Constraint' [UIS p.7]

The Infrastructure Delivery Plan (IDP) should therefore clearly link the proposed growth to the utility upgrades needed to support it. Before the Rezoning is finalised, the Government must demonstrate agreement with the relevant utility providers on the required works, identify funding and delivery responsibilities. The Rezoning must be supported by a credible infrastructure capacity assessment and a funded delivery plan.

Conclusion

I urge the Government not to proceed with the Rezoning in its current form. The concerns raised are not peripheral matters of design detail. They go to the fundamental suitability of the proposed scale of development, the adequacy of the evidence supporting it and the capacity to deliver the infrastructure and public benefits on which it relies. The exhibited material has not demonstrated that the proposed growth can be accommodated without unacceptable consequences for heritage, housing diversity, biodiversity, public amenity and essential local services.

Delivering more homes must mean more than increasing permissible heights and floor space ratios. It must also mean retaining and providing housing that meets a range of needs, protecting the services that sustain the community and ensuring that additional development is supported by funded and deliverable infrastructure. Heritage conservation, mature-tree retention and the protection of usable public open space must shape the planning controls from the outset. They cannot be left to compensate for excessive development capacity after it has been established.

I ask the Government to work with Council and the community on a substantially revised, locally informed approach, using Council's Alternative Approach as the starting point. That process should resolve the gaps in the technical assessments, reduce heights and densities to respond to demonstrated site constraints, strengthen affordable housing outcomes and establish clear commitments for infrastructure and essential services. Proposed parks, transport connections and other public benefits should be relied upon only where there is a credible mechanism to secure and deliver them. Any substantially revised proposal should be publicly exhibited with sufficient time and accessible information to enable meaningful scrutiny.

The community has made a considerable effort to understand the Rezoning and participate constructively, often in difficult circumstances. That effort deserves a substantive response explaining what has been heard, what will change and why.

As a Councillor and long-standing resident, I ask the Government to give genuine weight to this local knowledge and experience. The measure of this Rezoning should not be the number of dwellings it enables on paper, but whether it delivers a liveable, inclusive and well-serviced place for current and future residents while safeguarding the qualities that make these neighbourhoods distinctive. On the material exhibited, that case has not been made.

I hope that you might make yourself available to visit the Rezoning area and observe the uniqueness of this special place. I would be pleased to welcome you and discuss any aspect of my submission.

Yours sincerely



Cr Harriet Price