Harriet Price
Councillor – Paddington Ward

Woollahra Municipal Council

11 November 2026

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

Objection to SSD 94261458: 135-155 New South Head Road and 529-539 Glenmore Road, Edgecliff

I refer to your decision to declare a State Significant Development (SSD) at 135-155 New South Head Road and 529-539 Glenmore Road, Edgecliff (the Proposal).

As you might recall, the Proposal seeks to construct a 2 tower form with a new 26 storey building to New South Head Road and a 12 storey building to Glenmore Road, Edgecliff, compromised of:

- 94 dwellings;
- a 4 storey basement car park requiring extensive deep excavation to provide for 103 car spaces; and
- 1,439sqm of commercial floor space,

Approximately 28 dwellings are proposed to be designated as 'affordable housing' for 15 years. To facilitate the approval of the SSD, a concurrent amendment to the Woollahra Local Environmental Plan 2014 (Woollahra LEP) is also required.

I make the following submission in my capacity as a Councillor but not on behalf of Woollahra Council (the Council). My submission is based on my knowledge of and involvement in the Paddington community as an elected, local representative for 9 years and as a Paddington resident for 21 years.

Timing of the Exhibition Period

The exhibition period for the Proposal (28 October to 11 November 2026) coincided with the exhibition of the Government's State Led Rezoning of Woollahra, Edgecliff and Paddington (the Rezoning Proposal). The community has been preoccupied by the Rezoning Proposal - a major and complicated process - and was not in a position to engage meaningfully with a second. Submissions for the Rezoning Proposal were due on 30 October 2026.

I was only alerted to the exhibition of the Proposal through social media posts by local resident groups. I have since spoken with members of the community, many who did not even receive official notification that the Proposal was on exhibition, until after the exhibition period had begun. This is totally unacceptable.

The 14-day exhibition period is wholly inadequate for a proposal of this scale and complexity. The volume of material, including the Environmental Impact and Rezoning Statement (EIRS), technical reports, addendums and appendices, is overwhelming and impossible for residents to properly read, comprehend or interrogate in such a short timeframe. The overlap with the Rezoning Proposal compounds the problem, forcing the

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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, present and emerging.

community to respond to two significant planning processes at the same time. An extension to the exhibition period is both warranted and necessary.

I have written to you on many previous occasions to outline my concerns on behalf of the community and reiterate the inadequacy of the consultation process regarding a number of recent SSDs. The community has found navigating large volumes of technical documents to be confusing and intimidating. The Planning Portal has been unreliable and at times inaccessible. In fact, when I first searched for the Proposal via the Planning Portal (using the prompts for the Woollahra Local Government Area) no results were even returned.

Overall, the timing of the exhibition and the 'community consultation' process have been woefully inadequate and has not enabled genuine engagement. Curiously, the EIRS states that 'stakeholder engagement has been undertaken by the project team in the preparation of the EIRS including direct engagement with: adjoining land owners and occupants; Government, agency and utility stakeholders and the local community" [p. xviii]. That claim is difficult to reconcile with my experience. As a member of the local community and a Councillor for the Paddington Ward, I confirm that I have not been contacted by the Applicant.

Moreover, a rezoning of this magnitude would ordinarily be presented to Councillors for input and a Council resolution, accompanied by an extended period of community consultation. This has not occurred. Council has not been given the opportunity to consider the Proposal and resolve a position. The community has been denied the careful, locally informed process that a change of this scale demands.

Objection

Given the inadequate notification and the overlap with the Rezoning Proposal, I have not been able to review the Proposal comprehensively in the limited time available. This submission should therefore not be regarded as a thorough assessment of the Proposal. The absence of comment on any of the technical studies must not be construed as acceptance or endorsement of them.

I object to the Proposal and to the accompanying amendment of the Woollahra LEP, (which is in effect is a complete rezoning of the Site). In my view, the application should be refused.

The Rezoning Proposal

As you are well aware, the Rezoning Proposal plans to fundamentally rezone the Local Government Area. The Proposal seeks to pre-empt a decision on the Rezoning Proposal. In other words, the Applicant seeks a site-specific rezoning ahead of that outcome.

The Applicant is candid about why it chose the SSD pathway. It says the precinct process 'is likely to take a considerable time' and that 'Woollahra Council is opposed to development of this scale' [EIRS pp.50–52]. Avoiding a slower pathway is not a sound planning reason to depart from a coordinated precinct plan.

The Housing Delivery Authority (HDA) has recommended deferral of many expressions of interest (EOI) within the precinct, pending the outcome of the Rezoning. It is not clear why the HAD did not adopt a similar approach for this site.

Height and Scale

The Explanation of Intended Effect (EIE) for the Rezoning Proposal identifies this site as a 'key site' - with a height of 43.5m (about 12 storeys) and a floor space ratio (FSR) of 3.7:1. The uplift is only available, if a through-site link and a 5% affordable housing contribution is provided [EIE Appendix D]. The Proposal instead seeks 26 storeys and an FSR of 6.79:1. Council's current controls are 14.5m (about 4 storeys) and 1.5:1. Council's Edgecliff Commercial Centre Planning Proposal (ECCPP) envisages 10 storeys and 2.6:1.

The ECCPP recognises the need for coordinated planning across the precinct. The ECCPP remains under assessment, awaiting a Gateway Determination by the NSW Department of Planning, Housing and Infrastructure (DPHI).

Excavation and Parking

The proposed excavation is excessive, extending to about 21m and reaching 2–8m below the water table. Groundwater was monitored for only one month, against a recognised minimum of three. The dewatering model assumes a watertight wall, yet the geotechnical report itself says there is a 'very high' potential for that wall to leak. The model predicts drawdown of 1.4m at the property boundaries, several times the dewatering limits Council applies in Rose Bay and Double Bay. The geotechnical report also states that the excavation is 'anticipated to undermine the foundations of the terrace houses.' In addition, contaminated groundwater, including heavy metals and PFOS, could be discharged to Rushcutters Bay.

The parking provisions are excessive and inappropriate for the Site. The Site is extremely well located to public transport (within footsteps to the Edgecliff Railway Station). The excessive amount of parking provision undermines the Applicant's own Environmental Sustainability principles and the broader strategic objective of the State Government's goal for Environmental Sustainable Growth and its Travel Demand Management Strategy - to reduce car dependency in well serviced inner city areas and encourage the shift to public transport (as well as alternative active transport modes such as walking and cycling).

The excavation required to facilitate the multiple levels of basement car parking will take many months, resulting in frequent heavy truck movements, noise, dust and vibration. The community hold valid concerns relating to excavation in close proximity to the surrounding Paddington Heritage Conservation Area (HCA).

Overall, the proposed basement design and car parking provisions must be refused or alternatively, resigned to substantially reduce excavation and car parking. If parking was provided in line with Council's Development Control Plan (DCP) (which set a maximum parking rate for housing in accessible areas located close to public transport) basement depth and duration of excavation could be substantially reduced. This approach is more than justified.

Heritage Impacts

Six contributory buildings in the Paddington Heritage Conservation Area (HCA) would be reduced to facades. This is a completely unacceptable heritage outcome. The Applicant's own Heritage Impact Statement finds that these buildings meet the threshold for local listing.

The heritage impacts of the Proposal have not been adequately assessed. Retaining only the facades of six contributory buildings, while excavating a deep basement immediately beside them, raises serious questions that the application does not answer. There is no structural methodology demonstrating how the facades could be retained during demolition and excavation. There is no Conservation Management Strategy for the retained buildings. The geotechnical report itself states that the excavation is 'anticipated to undermine the foundations of the terrace houses'. These matters go to the heart of whether any heritage fabric can realistically be conserved and they must be properly assessed before any determination is made.

Facade retention of this kind is not conservation. Removing the roofs, interiors, rear wings and structure of contributory buildings leaves only a thin remnant of their streetscape presence, and the buildings' historical and social significance is lost. The towering 26-storey and 12-storey built form behind and above those remnants would overwhelm the finer grain, scale and character of the surrounding Paddington HCA.

The consequences for the HCA would be unacceptable. The Proposal would erode the integrity of the conservation area at its edge, set a damaging precedent for other contributory buildings in Paddington and diminish the very qualities for which the HCA was established. The impacts have not been adequately assessed and cannot be justified by the benefits claimed for the Proposal.

The heritage significance of this Site is also recognised by Council. Council has a Planning Proposal under assessment, awaiting a Gateway Determination from DPHI, that is fundamental to this Site (the heritage listing of Eight Sites and the Brentwood Estate Heritage Conservation Area). That Planning Proposal was lodged in early 2024 and includes the listing of three cottages at 543–547 Glenmore Road, Edgecliff. Approving a development of this scale before that Planning Proposal has been determined would undermine a heritage protection process that is already well advanced.

Impacts on Neighbouring Residents

The Proposal would have severe impacts on the neighbouring Diseno apartment building at 161 New South Head Road. Nine of the 22 viewpoints assessed in Diseno are rated 'severe' or worse. Solar access to Diseno would fall to 51%, against the 70% standard. At street level, 30 of the 34 wind test points would become windier. These impacts are unacceptable.

<u>View Loss</u>

The extent of view loss is substantial. Nine of the 22 viewpoints assessed, more than 40% of the total, are rated 'severe' or worse. This is not a marginal or isolated impact. It indicates that a large proportion of the apartments assessed in Diseno would lose significant parts of their existing outlook as a direct result of a 26-storey tower being placed immediately alongside.

For residents, the loss of views is not an abstract planning matter. Outlook, daylight and a sense of openness are fundamental to the amenity of an apartment and to the value and enjoyment of the homes. The loss of those qualities, combined with reduced sunlight and a harsher wind environment must be more throughly assessed.

The severity of the impacts is a product of the excessive height and bulk sought. The Proposal is more than twice the scale that the Government's own Rezoning Proposal

contemplates for the Site. A scheme that complied with the applicable controls, or that adopted the 43.5m height identified in the EIE, would be expected to cause far less harm.

The Applicant has not demonstrated that a more reasonable distribution of building height and bulk has been considered, or that the view impacts have been minimised. View and solar assessments of Diseno must be undertaken against a compliant scheme before any determination is made, so that the true extent of the additional impact is understood.

Planning principles on view sharing require a consent authority to consider the extent and nature of the view loss, the reasonableness of the proposal causing it, and whether a more skilful design could achieve the same development potential with less impact. On each of those tests, a proposal that produces 'severe' or worse impacts at 9 of 22 viewpoints, while seeking more than twice the intended scale of the Site, cannot be regarded as reasonable.

Taken together, the loss of views, the reduction in solar access and the deterioration of the wind environment represent a significant and unacceptable loss of amenity for neighbours. These impacts should weigh heavily against the Proposal.

Affordable Housing

About 28 dwellings, roughly 15% of the floor space, would be affordable for only 15 years. By contrast, the Rezoning Proposal, the ECCPP and Council's proposed Affordable Housing Contribution Scheme (also awaiting gateway determination) would all secure affordable housing permanently. In addition, the Rezoning Proposal seeks to 'switch off' the in-fill affordable housing bonus that the Applicant relies on to justify its FSR.

Flooding, groundwater and wind

The same failure to consider cumulative effects applies to flooding, groundwater and wind. Deep excavation and dewatering at this Site, combined with other basements and below-ground works in the area, could alter groundwater levels and flow paths, with potential consequences for neighbouring properties and the nearby heritage terraces. The Glenmore Road frontage is also subject to flood risk. Additional hard surfaces and building bulk across the precinct could change overland flow paths and worsen flooding, and none of this has been tested. Similarly, a 26-storey tower will not be the only tall building in this area if the Rezoning Proposal proceeds. The wind effects of the Proposal need to be assessed together with the other towers that are expected to be built around it.

Traffic and parking

Council's traffic modelling shows that New South Head Road has less than 7% spare capacity. A road operating so close to its limit cannot absorb the additional traffic generated by a development of this size without consequences for the wider network. The Applicant's traffic assessment does not adequately consider these effects together with other approved and foreseeable development in the Edgecliff precinct.

The Proposal nonetheless includes 103 car spaces on a site only a five-minute walk from Edgecliff Station. Providing this level of parking in one of the best-serviced locations in the eastern suburbs is contrary to the objective of reducing car dependency. It would

add traffic to an already constrained road network and would require a four-storey basement that drives the excavation and groundwater risks described above.

Cumulative Impact Assessment

Considering each impact in isolation understates the true effect on the community and the environment. Before any determination is made, the Applicant should be required to provide a comprehensive cumulative impact assessment that considers traffic, flooding, groundwater and wind together with other approved, proposed and reasonably foreseeable development in the Edgecliff precinct, including development anticipated under the Rezoning Proposal. Without it, the consent authority cannot properly understand, let alone manage, the combined impacts of the Proposal.

Council's Alternative Approach

As you are aware, Council has developed an Alternative Approach to the Rezoning Proposal. The Alternative Approach is based on the principle that Council should retain the primary role in determining how and where growth is accommodated, through locally informed planning processes.

The Alternative Approach indicates a capacity for up to 3,600 new dwellings. While it has been adopted by Council, it is not a completed process. It has not been the subject of community consultation or detailed feedback. It is a starting point only and 'the basis for the first stage of any future rezoning, subject to further investigation, refinement and public consultation'. It is also fundamentally linked to the delivery of a new Woollahra railway station and other funded infrastructure.

The Alternative Approach was prepared to guide strategic planning across the broader precinct. It was never intended to endorse individual development applications or site-specific uplift. It does not identify this Site for a 26-storey tower and nothing in it supports the height and scale now proposed.

It must be emphasised that the Alternative Approach illustrates potential capacity for new dwellings, contingent on a number of other deliverables, including the new station and supporting infrastructure. It does not carry statutory weight in the assessment of an SSD.

The Applicant cannot selectively rely on the capacity identified in the Alternative Approach while disregarding the conditions attached to it. Those conditions include local investigation, public consultation and the delivery of new infrastructure. Council's position on development of this scale is also clear, as the Applicant itself acknowledges. Any suggestion that the Alternative Approach supports the Proposal misrepresents its purpose and status.

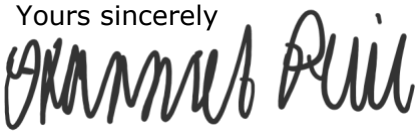
Conclusion

I request that the Proposal be refused in its entirety, including the proposed amendment to the Woollahra LEP. In the alternative, determination of this application should be deferred until the broader Rezoning Proposal is finalised. Any uplift on this site should only be considered within a staged framework that takes effect once Woollahra Station is formally committed to and delivered. Furthermore, it is imperative that all outstanding Planning Proposals are assessed without further delay.

Finally, given the complexity and significance of these matters, I ask that procedural fairness be afforded to the community and that any resident or stakeholder seeking a genuine extension of time to make a submission be granted one.

I would be pleased to discuss any aspect of this submission.

Yours sincerely



Cr Harriet Price