SUBMISSION — OBJECTION

Edgecliff–Woollahra Precinct State-led Rezoning Proposal

Lessons from Nine Elms, London and Docklands, Melbourne: the pitfalls of developer-led rezoning

To: NSW Department of Planning, Housing and Infrastructure (via the NSW Planning Portal)

From: Councillor Merrill Witt, Vaucluse Ward, Woollahra Municipal Council

Date: 29 October 2026

Position: I OBJECT to the Rezoning Proposal in its exhibited form.

This submission is made in my capacity as a Councillor for Vaucluse Ward. The views expressed are my own and do not represent a resolution or the formal position of Woollahra Municipal Council.

1. Summary

The Edgecliff–Woollahra Rezoning Proposal asks the community to accept heights of up to 121 metres (around 34 storeys) and floor space ratios of up to 9:1 (Department of Planning, Housing and Infrastructure, Explanation of Intended Effect: Edgecliff-Woollahra Precinct State-led Rezoning Proposal, September 2026 [EIE], p. 13), and capacity for around 9,400 new homes, in return for a new station, new parks, community facilities and affordable housing (EIE, p. 4).

Looked at closely, those benefits are much thinner than the headline suggests, and most of them are not secured:

- **Parks.** The promised "3.5 hectares of new, extended and embellished public open space" (EIE, p. 4) is made up of about 2.0 hectares of new space and 1.56 hectares of "embellishments" to three existing parks: Cooper Park, the Lough Playing Fields and Moncur Reserve. More than 40% of the headline figure is therefore land residents already have.
- **The new open spaces are mostly small:** eight of the eleven are under 3,000 square metres, and they range from a 283 square metre extension to Saber Street Reserve to 4,261 square metres at Cliff Edge North (ATX Consulting for the Department of Planning, Housing and Infrastructure, The Edgecliff-Woollahra Precinct Social and Community Infrastructure Assessment, 3 September 2026 [the Assessment], Table 13, p. 79). **For around 19,600 new residents (p. 60), that is roughly one square metre of new open space each.**
- **Embellishment means intensifying the activities in existing parks:** the Government's own assessment proposes six to ten multipurpose hard courts and floodlighting at the Lough Playing Fields, a flood prone area with a history of residential opposition to hard-surfacing green spaces because of noise, traffic and parking issues from more intensive activation (pp. 73, 76).
- **Affordable housing contributions are negligible.** The base requirement is just 3% in perpetuity, rising to 15% only on specific mapped sites, and it can be satisfied with cash instead of homes (EIE, p. 17).

- **Delivery of new parks and community facilities is uncosted and uncertain.**

The new parks and most of the new community facilities depend on developers choosing to take up incentive controls (Explanation of Intended Effects (EIE), p. 16).

- The station is costed only as "$$$" (MM Australia, Edgecliff and Woollahra Infrastructure Delivery Plan, prepared for the Department, 10 August 2026 [IDP], p. 43),
- the transport levy remains subject to feasibility testing (EIE, p. 26), and
- funding sources for much of the rest are, by the Department's own account, yet to be identified (EIE, p. 27).

This model has been tried before, and two well-documented precincts show where it leads. At Nine Elms in London, a transport link was funded from development uplift and delivered, but affordable housing was traded away, a promised river crossing was never built, the linear park was tied to development completion and has been slow to deliver, and the housing product was skewed toward investors.

At Docklands in Melbourne, a market-led approach delivered towers but not the schools, parks and community facilities residents needed; these are still being retrofitted at public expense more than 25 years later.

The two cases differ in important ways, and this submission acknowledges those differences. **But they share a common lesson: benefits that are not legally secured at the rezoning stage are the ones that fail to arrive.**

The Edgecliff–Woollahra Precinct State-led Rezoning Proposal, on the evidence of its own supporting documents, repeats that structure. **Unlike either case study, however, the Edgecliff–Woollahra Precinct is not vacant land: the Proposal would also degrade the heritage and leafy character on which its own economic case depends.**

According to the Rezoning Proposal's heritage consultant, GML Heritage, the area's heritage significance is not just about its heritage listed buildings, including seven items on the State register. It's **“expressed collectively through contributory fabric, fine-grained subdivision, low-scale streetscapes, mature landscape settings, sandstone walls, topography and HCA legibility, particularly in Queen Street, East Woollahra, the Plateau, Woollahra Centre and the Trumper Park interface” (**GML Heritage Edgecliff Woollahra State-Led Rezoning Milestone 4—Heritage Assessment Report, September 2026, p.5).

The Trumper Park interface also sits at the southern edge of the Paddington HCA, which is widely regarded as one of the best-preserved Victorian-era suburbs in Australia. (Susan Wyndham, Paddington review: The first history of the famous suburb for 40 years, The Sydney Morning Herald, 1 February 2019).

GML Heritage identifies the cumulative loss of contributory fabric as the central risk, and that is exactly what the Rezoning Proposal allows. It argues that "cumulative impact is the central heritage issue and must be assessed at precinct, character-area, block and streetscape scales” (p. 7).

Understandably, GML Heritage's support is heavily qualified, noting that “acceptable heritage outcomes can be achieved” only if its recommendations are “translated into statutory controls that

secure retention, manage interfaces, protect landscape and setting, and address cumulative impacts at rezoning stage”(p. 7). In its current form, the Rezoning Proposal addresses none of these concerns .

This submission sets out the parallels with the two relevant case studies and concludes with specific requested changes to the Rezoning Proposal.

2. Case study 1: Nine Elms, London

Nine Elms is a former industrial riverside district between Vauxhall and Battersea. A partnership of Wandsworth and Lambeth Councils planned around 20,000 new homes there, with green space, visitor attractions and 25,000 jobs (Building magazine, "Nightmare on Nine Elms Street", undated, c. 2016). The centrepiece was a two-station extension of the Northern Line, funded largely by contributions from the developments it was meant to serve (Pinsent Masons, Out-Law News, "Plans approved for 3,000 new homes in Wandsworth", 20 June 2012).

2.1 What was delivered

- The Northern Line Extension opened in September 2021, with stations at Nine Elms and Battersea Power Station.
- The US Embassy relocated to the area in 2017 and Battersea Power Station was redeveloped.
- Sections of the Linear Park were built, but only in phases as each adjoining development was completed (The B1M, "Regenerating Nine Elms: London's New District", 15 February 2017).

2.2 What went wrong

Affordable housing was traded for infrastructure. The London Plan had originally aimed for half of new housing in opportunity areas to be affordable, with developers able to argue for less through financial viability assessments, which in practice became a routine get-out clause (O. Wainwright, "Penthouses and poor doors: how Europe's 'biggest regeneration project' fell flat", The Guardian, 2 February 2021).

At Nine Elms, the 2012 planning framework went further. It noted that Lambeth and Wandsworth would usually require 33–40% affordable housing, but said contributions to transport infrastructure should be prioritised and that a target of just 15% should be allowed. Developers contributed £266.4 million towards the two new Northern Line stations. Affordable housing across the area now averages around 18% (The Guardian 2021).

At Battersea Power Station the developer was permitted in 2017 to cut its commitment for affordable housing from 15% to 9% of the proposed 4,239 dwellings due to the cost and technical issues involved in the restoration work. This led to the removal of 250 affordable homes, with the remaining affordable dwellings located half a kilometre away, across a main road and beside the noisy railway (The Guardian, 2021).

Local reporting found that only three of the first 2,420 flats built there were affordable family-sized homes (South West Londoner, "Luxury Battersea flats snapped up by millionaires is 'fuelling housing crisis', claims Lib Dem candidate", 16 April 2015, citing BBC figures).

Promised amenity was not delivered. Wandsworth selected a design for a £40 million pedestrian and cycle bridge across the Thames to Pimlico in 2015. It was met with sustained opposition and never built. The Mayor of London declined to proceed without the support of all affected authorities (L. Laker, "Nine Elms cyclist bridge put on ice by Sadiq Khan", road.cc, 7 July 2016).

The housing product did not match local need. The flats were designed as investment products: The Guardian's architecture critic described "investment grade space", with small rooms that just meet minimum standards (The Guardian 2021).

Some towers were pitched at more than £2,000 per square foot, twice the price of their neighbours, and prices in one later fell by an average of 20% over five years.

Demand was weaker than it appeared. Analysts found agents repeatedly delisting and relisting the same flats, so that 35 properties for sale looked like 368 and prices appeared to be rising when they were falling, while developers were quietly selling homes in bulk to corporate landlords at discounts of up to 38% (The Guardian, 2021). In one development 85% of the first 800 flats were reported to have been sold to overseas buyers (N. Durrant, "Labour and Conservatives clash over housing in Wandsworth", South West Londoner, 26 July 2021).

The model also proved fragile for developers themselves. In 2022 the Chinese developer R&F Properties sold its 50% stake in the Thames City (Nine Elms Square) scheme to its partner CC Land, booking a loss of about £187 million; fewer than 90 flats there had sold in 2020, more than half of them to related parties (The Telegraph, "Chinese developer sells another Nine Elms project at £187m loss", 29 April 2022, as reported in C. Richert, "Thames City project in Nine Elms sold as developer pulls out", Clapham Junction Insider, 4 May 2022).

In 2024 R&F sold its One Nine Elms towers for a nominal sum, saying that sales milestones in its loan agreements had become "increasingly difficult to meet" (Bisnow, "Chinese Developer Sells £1B London Project At Big Discount As Loan Default Looms", 6 February 2024).

Values have fallen and running costs have risen. Official UK House Price Index data show Wandsworth flat prices down 5.7% year on year, and resale data show Nine Elms owners accepting nominal losses (Investropa, "Are Nine Elms flats finally repricing?", investropa.com, updated 5 October 2026, citing the UK House Price Index).

Annual service charges of £6,000–£7,000 for a one- or two-bedroom flat are common in current listings (Benham and Reeves sales listings for Sky Gardens, Wandsworth Road SW8 and Electric Boulevard SW11, 2026).

Shared-ownership residents in one block have taken their landlord to tribunal after service charges rose roughly five-fold (C. Lillywhite, Local Democracy Reporting Service, "Leaseholders battle 'unbearable' service charges for concierge and garden used by wealthy neighbours", South London Press, 17 June 2025).



Nine Elms (October 2026), Author's photo

One tall tower led to many. The first, the 180-metre St George Wharf Tower, was refused by Lambeth Council but approved by the Secretary of State in 2005, despite expert warnings that it "could set a precedent for the indiscriminate scattering of very tall buildings across London". It did: once one 200-metre tower was permitted, neighbouring landowners inflated their plans, backed by the threat of costly appeals if refused (The Guardian, 2021).

The community became divided. Affordable homes were placed at the back of sites, where land values are lowest, along the railway line. At Embassy Gardens, a shared-ownership resident reaches his flat through "a small door located between ventilation grilles and a bin store, facing onto a railway line", while private residents use a hotel-style main entrance and have a private cinema, gym, rooftop bar and the Sky Pool. "It's only there for us to look at," he said.

At a neighbouring scheme, a gated fence keeps housing association tenants out of the podium garden, and one told The Guardian: "We are strategically excluded from being part of the community." The housing associations said affordable tenants were excluded from private amenities

to keep their service charges down (The Guardian, 2021). As recently as May 2021, Wandsworth's planning committee approved a further scheme with separate entrances (C. Richert, "Nine Elms: hubris and complacent council leads to obscenity", Clapham Junction Insider, 5 June 2021).

2.3 A fair reading

Nine Elms is not a simple failure, and parts of the criticism are contested. London's prime market was hit by a fall in prime prices as overseas-buyer demand weakened (Building), which does not apply in Sydney.

The image of empty investor flats is also disputed. A 2018 survey of 873 residents of new Nine Elms homes, commissioned by Wandsworth Council, found that 60% held UK passports, most householders worked full time on earnings close to the London average, three-quarters had moved from elsewhere in London, and 72% of their children attended state schools (Bisnow, "Nine Elms Might Not Be The Dystopian Vision Of Empty Flats You Imagined", 28 March 2018).

The survey, however, did not report on how many residents rent or how many homes sit empty. **And the core lesson is not in dispute: when public benefits are funded from uplift, viability pressure falls on the benefits that are not legally locked in.**

3. Case study 2: Docklands, Melbourne

Docklands is a 200-hectare waterfront precinct on the western edge of Melbourne's CBD, redeveloped from former port land beginning in the late 1990s. It now houses more than 15,000 residents in a mixed use development of apartment towers, offices and retail. Unless otherwise noted, this section draws on The Age's April 2024 series on Docklands (C. Waters, R. Dexter and M. Cunningham, "Docklands: Lifeless concrete jungle or vibrant hub", The Age, 12 April 2024), as summarised in the inquiry evidence described in section 3.3. As a Melbourne precinct operating in an environment of comparable planning, market and governance conditions, it is directly relevant to the Edgecliff-Woollahra Precinct State-led Rezoning Proposal.

3.1 The delivery model

In 1997 the Kennett Government decided that Docklands should be market-driven, with no government subsidy. To make the scheme commercially viable, the land was divided into seven large precincts and released to the market largely at once.

Only well-capitalised developers could take on sites of that scale, and only large apartment towers and corporate offices could deliver the returns needed to justify the risk. **The developer-led approach made no provision for schools, parks or libraries.**

3.2 What went wrong

Schools were not planned for. The precinct was not designed with families in mind, but families came anyway. A State review in 2016 projected a shortfall of around 4,800 primary and 2,000 secondary school places across Docklands and surrounding areas by 2031 (Premier of Victoria, "Docklands School Review Moves To Next Stage", media release, 29 February 2016). A $58 million

primary school opened in 2021, but enrolments grew so quickly that a temporary campus had to be opened in a shopping centre, and the school has used a car park rooftop for playground space.

Docklands still has no high school and no land identified for one (N. Sambul, "There are hundreds of children in Docklands, but no high school. Residents want it built on the Costco site", The Age, 12 April 2024). The residents' campaign for one on the former Costco site failed in 2025 when the site was instead sold to Sonic Healthcare for $100 million for a pathology laboratory (Real Estate Source, "Costco sells ex-Docklands store", 6 June 2025).

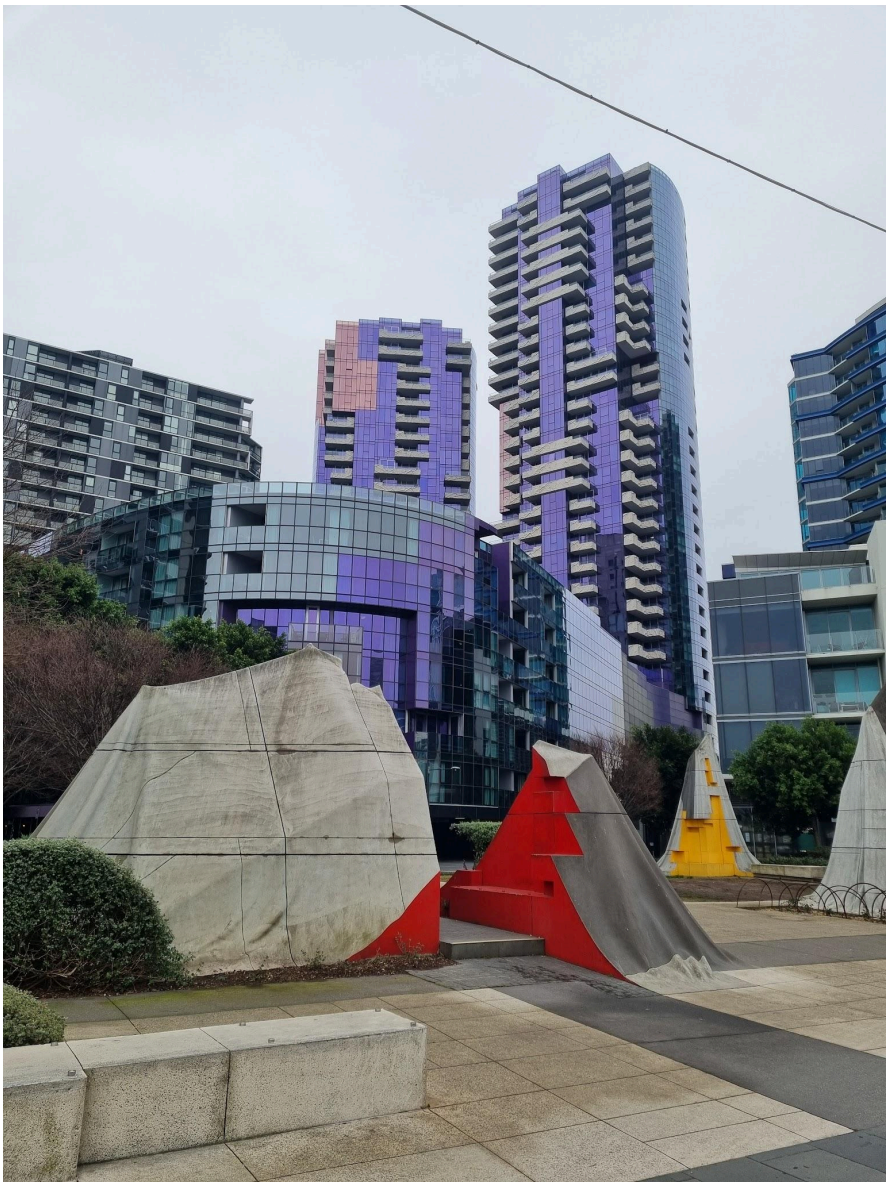
Open space and community facilities were retrofitted at public expense. Because amenity was not secured at the outset, public space and facilities have had to be added later, at State Government cost.

Community groups continue to argue that the precinct has an open space deficit. The Docklands Neighbourhood House, which ran a homework club and a playgroup for newly arrived families, closed in 2023 when the City of Melbourne stopped funding it: a reminder that delivering a facility is not enough without ongoing operating funding.

A transient, single-product community. According to the head of the Planning Institute of Australia's Victoria division, around two-thirds of Docklands residents rent, which makes the community comparatively transient. The dominance of apartment and office towers, low home ownership and a high number of short-stay rentals have left the precinct vulnerable to economic shocks, as the pandemic showed.

Streets and waterfront that people avoid. Hospitality and street-front retail have struggled for years. In December 2020 a City of Melbourne survey found 47% of Docklands street-front shops closed, 21.9% of them vacant (3AW, "The staggering number of closed and vacant shopfronts in Docklands", 1 March 2021).

The pandemic made matters worse, but closures continued afterwards, including a string of waterfront venues in 2023 and 2024.



Docklands (July 2024), Author's photo

Part of the reason lies in the built form. Docklands sits in the path of Melbourne's south-westerly winds, and apartment and office towers were built over open space with little regard to their effect at street level. A wind engineer told The Age that "there was never a clear plan for the area on how to manage and mitigate wind" and that "no in-depth wind testing has ever been conducted in the suburb to guide future planning" (M. Cunningham, "The Bureau of Meteorology is based in Melbourne's 'freezing wind tunnel', but no one's measuring the wind there", The Age, 12 April 2024).

The then Lord Mayor also pointed to streets lined with "entrances into apartment or office buildings with no activity, really, happening at a ground level" (N. Sambul, "Docklands can shake its ghost-town reputation. Here's how", The Age, 27 January 2024). The City of Melbourne now requires a wind impact assessment by a qualified wind engineer for new permits in the Docklands.

3.3 Has Docklands improved?

In evidence to the NSW Legislative Council inquiry into the Transport Oriented Development Program in June 2024, Grattan Institute's Brendan Coates argued that criticism of Docklands is outdated and that it is now a vibrant community offering comparatively affordable inner-city housing (NSW Legislative Council Portfolio Committee No. 7, Inquiry into the development of the Transport Oriented Development Program, uncorrected transcript of evidence, 7 June 2024, p. 27).

At the Chair's request, I prepared and lodged supplementary evidence to the inquiry on behalf of the Save Greater Sydney Coalition, setting out why Docklands is widely considered a planning failure (Save Greater Sydney Coalition, supplementary evidence to the Inquiry into the development of the Transport Oriented Development Program, received 26 June 2024). This section draws on and updates that evidence.

There is some truth in Mr Coates's view. The Melbourne Star observation wheel is due to reopen by the end of 2026 (Time Out Melbourne, "It's official: the infamous Melbourne Star will spin again in 2026", 27 July 2026); Development Victoria and the AFL are seeking a partner to redevelop the Harbour Esplanade waterfront with new public spaces and pedestrian links to the CBD; and Development Victoria is removing the unsafe Central Pier with a view to revitalising the waterfront (Development Victoria, "Search for development partner to transform Harbour Esplanade", development.vic.gov.au, updated 6 February 2026; Development Victoria, Central Pier project page, updated 30 April 2024).

But the improvements are almost entirely State-led and publicly funded, arriving decades after the original release, and they are concentrated on the waterfront and visitor attractions. The core social infrastructure gap that matters most to residents, a secondary school, remains unresolved, and the most obvious remaining site has gone to another use.

Docklands has improved because the government has spent public money fixing what planning should have required at the outset. That is the lesson for the Edgecliff-Woollahra Precinct State-led Rezoning Proposal.

3.4 A fair reading

Docklands differs from the Edgecliff-Woollahra Precinct in one important respect: it was largely government-owned land released in large parcels, whereas the Edgecliff–Woollahra Precinct is established infill with fragmented ownership.

The risk in this case is therefore not an "instant city" but the opposite: slow, piecemeal redevelopment in which public benefits tied to individual sites arrive late, or not at all, while the population grows regardless.

4. The common lessons

1. **Benefits not secured at rezoning are the ones that fail.** At Nine Elms, affordable housing and the bridge gave way; at Docklands, schools and open space were never required. In both, the priority infrastructure or the private product was delivered, and the community infrastructure was not.

2. **Land for schools and parks must be identified up front.** Once sites are redeveloped, land for schools and parks becomes very hard and very expensive to find, as the loss of the Costco site at Docklands shows.
3. **Fixing it later costs the public.** Both precincts have required substantial public spending after the event to retrofit what should have been planned and funded upfront.
4. **A single housing product creates a fragile community.** Investor-oriented, renter-dominated apartment towers produced transience at Docklands and falling values and high running costs at Nine Elms.

5. How the same risks appear in the Edgecliff–Woollahra Rezoning Proposal

The table below summarises the parallels. Each is then discussed with reference to the Proposal's exhibited documents.

Issue	Nine Elms, London	Docklands, Melbourne	Edgecliff–Woollahra
Delivery model	Infrastructure funded by developer contributions from uplift	Market-driven, no government subsidy; land released to large developers	Key-site incentive controls; developer-funded public benefits
Affordable housing	15% vs London norm of 33–40%; cut to 9% at the Battersea Power Station	Little social or affordable housing; two-thirds of residents rent	3% base rate; 4–15% on mapped sites; one key site at 0%; cash in lieu
Schools	—	No high school; primary school over capacity soon after opening; hoped-for school site sold	No public high school in the LGA; IDP says no new school needed short to medium term
Open space and facilities	Linear Park built piecemeal; Pimlico bridge never built	Parks retrofitted at State expense; Neighbourhood House closed when funding ended	Ten parks, all optional; open space need of 19–39 ha vs 3.5 ha anticipated delivery
Existing character	Former industrial land; little to lose	Former port land; little to lose	Established heritage precinct with 32% tree canopy; its character is the market's main selling point
Housing product	Investor-oriented luxury flats; high service charges; falling values	Apartment towers; transient, renter-dominated community	Government's economist expects luxury product beyond average earners

5.1 Public benefits are optional, not secured

The Explanation of Intended Effect (EIE) states that incentive heights and FSRs apply only where key-site requirements are met, and that where they are not, the existing controls continue to apply (EIE, p. 16). **The parks, community facilities and through-site links that justify the uplift will therefore only appear if individual developers judge them worthwhile.**

The EIE also states that the number, location and scope of key sites and their public benefits may be refined through exhibition feedback (EIE, p. 16), which leaves the package open to negotiation downward.

The Infrastructure Delivery Plan (IDP) lists all ten proposed new parks as "Developer – Public Benefit" items, each costed only with a "$" symbol rather than a figure (IDP, Table 6, p. 45).

Of the $1.33 billion in identified infrastructure, $556 million is assigned to developers and $314 million to Council (IDP, Table 10, p. 51). The IDP's next steps include confirming staging and funding with Council and, if required, a new local contributions plan (IDP, p. 51). The EIE acknowledges that where contribution plans or the Housing Productivity Contribution (HPC) are inadequate, a "suitable alternative funding source" will need to be identified (EIE, p. 27).

This is the structure common to both case studies: benefits tied to the pace and viability of private development, with nothing in the Rezoning Proposal to prevent uplift being granted while benefits are deferred, reduced or never delivered.

Nine Elms also shows that developers under financial pressure sell, stall or renegotiate: R&F withdrew from two major schemes at heavy losses. Where a park or community facility depends on a particular key site being developed, that risk falls on the community.

5.2 The Proposal would erode the qualities that give Woollahra its value

Unlike Nine Elms and Docklands, which were built on former industrial and port land, the Edgecliff–Woollahra Precinct is an established neighbourhood – the principal value lies in what is already there.

The Government's own economist is explicit about its existing attributes. Atlas Urban Economics expects demand for new apartments to rest on proximity to the CBD, harbour views and "the appeal of the heritage values and leafy streetscapes" (Atlas Urban Economics, Edgecliff-Woollahra State-led Rezoning: Economic Impact Assessment, prepared for the Department, September 2026 [Economic Impact Assessment], p. v). It attributes Woollahra's median unit price growth of 6.5% a year over the decade to 2025, against 1.6% across Greater Sydney, to the interplay of heritage values, leafy appeal, amenity and scarcity (p. 19). **The Rezoning Proposal's market case therefore depends on the two qualities – heritage and leafy streetscapes – its proposed built form would most damage.**

Heritage. Woollahra Council's mapping of the master plan indicates that around 310 contributory buildings in the heritage conservation areas would be directly affected, about 191 of them likely to be demolished, and 26 heritage items left isolated beside redevelopment sites. **The loss would be enough that the Woollahra Heritage Conservation Area may no longer meet the threshold for listing** (Woollahra Municipal Council, Edgecliff-Woollahra State-led Rezoning – Council Submission, September 2026, PDF p. 122 and pp. 57, 59).

The Department's own heritage consultant, GML Heritage, identifies cumulative impact as the central heritage issue, and warns that design excellence and future merit assessment cannot substitute for clear statutory controls (GML Heritage, Edgecliff Woollahra State-Led Rezoning Heritage Assessment, September 2026, p.7). Its support for the master plan is expressly contingent on the rezoning controls setting clear limits and design requirements at the outset, rather than relying on future merit-based assessment (p. 114).

GML also recommends that the Low and Mid-Rise Housing Policy be excluded from, or clearly subordinated to, the precinct framework (Executive Summary). Yet key protections are left to a discretionary Design Guide rather than the planning instrument (Council submission, p. 89).

Even a far smaller scheme cannot avoid this harm. Council's own Alternative Approach, at 2,200 to 3,600 additional dwellings, was designed around the heritage conservation areas, yet Council's heritage staff concede a negative impact on the heritage values of the Woollahra Heritage Conservation Area is "unavoidable if seeking to permit a substantial increase in density", with "more modest negative impacts" on the Paddington Heritage Conservation Area.

About 26 contributory buildings would most sensibly be assumed to be demolished under that scheme (Woollahra Municipal Council, Late Correspondence, Item 16.7, Alternate Approach to the State-Led Rezoning – Cumulative Impacts, staff memorandum, 24 August 2026 [Staff memo, Item 16.7], pp. 7–8).

The Government's Rezoning Proposal carries between two and a half and four times that yield and affects around 310 contributory buildings. **If the smaller, heritage-led scheme cannot avoid harm, the Proposal's damage would be far greater.**

Tree canopy and green character. The Biodiversity Assessment estimates current canopy cover in the Precinct at 32%, or 51.25 hectares (Eco Logical Australia, Edgecliff-Woollahra Precinct – State Led Rezoning: Biodiversity Assessment, September 2026 [Biodiversity Assessment], p. 66). Every proposed building envelope intersects existing canopy, and 452 street tree canopies fall wholly within the impact area (p. 66). Most of the vegetation directly affected, 5.66 of 6.75 hectares, is in private gardens (p. 62), yet the tree-by-tree assessment excluded trees on private land altogether (p. 66). On the consultant's own figures, canopy would fall from 32% to 29%, below Woollahra's 30% target (p. 80).

The report then concludes that canopy could recover to 33%, but only by assuming that 100% of new open space, through-site links and deep-soil areas are planted with tree canopy (pp. 78, 80), and by describing the loss as temporary (p. 80). The same report notes that the mature trees provide hollows that are critical to native wildlife sustainability, and they can take more than a century to form (p. 50).

Replacing established trees with saplings is not a temporary loss for human and native wildlife residents.

This is the contradiction at the heart of the Rezoning Proposal. As Council has observed, it relies on the desirability of places like Woollahra to justify growth while weakening the controls that created their appeal and sustainability (Woollahra Municipal Council, report to the Extraordinary Council Meeting of 30 September 2026, Item 12.1 [Council report], p. 5).

The Economic Impact Assessment acknowledges a "potential loss of neighbourhood character", but says it will be offset by public spaces, community facilities and affordable housing (p. v): the very benefits that, as sections 5.1 and 5.4 show, the Proposal does not secure.

5.3 Schools have not been planned for

There is no public high school in the Study Area or anywhere in the Woollahra LGA; the nearest are Rose Bay Secondary College, Randwick High School and Inner Sydney High School (Cred Consulting, Edgecliff and Woollahra State-led Rezoning – Social Infrastructure Needs Study, commissioned by Woollahra Municipal Council, March 2026 [Needs Study], pp. 40, 56).

The Needs Study estimates the rezoning could add between 255 and 1,021 high-school-aged young people and between 357 and 1,427 primary-aged children (p. 56), but acknowledges that school planning is a responsibility of the NSW Government (p. 56).

The IDP states that the rezoning will not create a need for a new school in the short to medium term, relying on existing capacity at Woollahra Public School and surrounding schools. It says the Department of Education will continue to monitor enrolments (IDP, s. 5.5, p. 34). No land is reserved and no school is listed in the works schedules.

This is exactly the Docklands sequence:

- **a precinct planned as though families would not come;**
- **a reliance on monitoring rather than land reservation; and**
- **a school shortfall that becomes impossible to fix once the sites are gone.**

Woollahra Public School is already near capacity with 701 enrolments (Needs Study, p. 57). The time to secure land for school expansion, or for a new public secondary school, is now.

5.4 Affordable housing is set too low and allows cash in lieu

The Proposal sets a base affordable housing contribution of just 3%, rising to 15% only on specific mapped sites, and allows contributions to be satisfied by money rather than dwellings (EIE, p. 17).

Key sites delivering other public benefits may be excluded from the scheme altogether (EIE, p. 17); one Edgecliff key site, 2–4 New McLean Street, carries a 0% affordable housing requirement despite an FSR of 4.3:1 (Economic Impact Assessment, p. 5).

This is much lower than the 15 per cent rate for which Nine Elms was widely criticised (The Guardian, 2021). It also sits uncomfortably beside the Department's own Sydney Plan, which cites Waterloo South as a model precinct delivering a minimum 30% social housing and around 20% affordable housing alongside a new station (NSW Government, The Sydney Plan, August 2026, p. 69).

The 3% base rate is also hard to reconcile with the advice of the Government's own consultant. Atlas Urban Economics, which prepared both the Precinct's Economic Impact Assessment (EIA) and its Affordable Housing Strategy, also reviewed the City of Sydney's contribution rates in October 2024. For the City's East precinct, which takes in Rushcutters Bay, Elizabeth Bay and Potts Point immediately west of Edgecliff, Atlas recommended a uniform 20 per cent residential contribution on rezoned land (Atlas Urban Economics, Review of Affordable Housing Contribution Rates, report to the City of Sydney, October 2024, Executive Summary).

The urban planning academic Glen Searle notes in a 2026 peer-reviewed review of Sydney's housing supply policies that analysis prepared for NSW Treasury found Woollahra the most financially feasible suburb in Sydney for new apartments (G. Searle, "Sydney's New Housing Supply Policies: A Review",

Urban Policy and Research, vol. 44, no. 2, 2026, pp. 217–229, at pp. 225–226), and the EIA expects new apartments in the Edgecliff-Woollahra Precinct to be priced at the luxury end of the market (p. 21).

Searle describes requirements of 2–3% as "tokenistic at best", noting far higher rates in London and Adelaide and that higher requirements set in advance allow land prices to adjust (Searle 2026, p. 226). Consequently, a recommendation for a 3 per cent affordable housing contribution base rate against a 20 per cent base rate for equally high end suburbs in the neighbouring City of Sydney deserves scrutiny. The Government should explain why a rezoning in Edgecliff-Woollahra Precinct warrants less than one-sixth of the rate the same consultant recommended just across the municipal boundary.

The proposed trade-off. Cash contributions are a particular concern in Woollahra. SGS Economics notes that community housing providers prefer pooled monetary contributions (SGS Economics and Planning, Broad-Based Affordable Housing Contribution Scheme, report to Woollahra Council, 20 April 2026, p. 72). That is understandable from an operator's perspective, but in a municipality with very few sites available for affordable housing, cash collected in Edgecliff may never become homes in Edgecliff.

The City of Sydney's experience is instructive. Where developers have been given the choice, they have overwhelmingly paid cash rather than build affordable dwellings (City of Sydney, "Post Exhibition – Planning Proposal – Affordable Housing Contributions Review", report to the Equity and Housing Committee, 11 May 2026). In 2023 Meriton committed to the community and to the City that it would build an affordable housing building on its Zetland site at 118–130 Epsom Road and 905 South Dowling Street. After the City approved the rezoning of the former Suttons Holden site, subject to Meriton's offer, the developer withdrew it and advised that it would build no on-site affordable housing. It opted instead for a financial contribution estimated at $29 million. The City responded by resolving to seek the power to require on-site delivery (City of Sydney, Resolution of Council, "Power to Require Affordable Housing be Built on Site by Developers", 19 February 2024).

The question for Edgecliff–Woollahra is the one Zetland leaves unanswered: if affordable housing is not built on the sites that generate the uplift, where else will it be built? In a municipality with almost no land available for affordable housing, the honest answer is nowhere nearby. That episode is a direct warning for a Proposal whose key-site benefits may be refined after exhibition.

Affordable housing in this Precinct should be required onsite, as dwellings, and written into the instrument rather than left to negotiation.

5.5 The housing product will not meet local need

The Government's own Economic Impact Assessment expects the market to deliver residential products aimed at the luxury end, and acknowledges that even with a unit-mix control, new dwellings are likely to be priced beyond the reach of average income earners (Economic Impact Assessment, p. 21). The Proposal imposes a dwelling mix only within 200 metres of the stations, deliberately leaving the rest of the Precinct to the market in order to preserve developer capacity to pay contributions (p. 21).

Both case studies show where this leads: towers designed around investor returns rather than residential need, high strata levies, and a transient community. The Department should explain why the same outcome would not occur here.

5.6 Everything hinges on the station, and on a market that can only absorb so much

The Proposal's growth is premised on the new Woollahra Station, and the Department's economist expects development momentum to build from 2028–2029, coinciding with the station's completion (Economic Impact Assessment, p. 25). Yet the same report describes that completion date as an "estimated project completion time, subject to change" (p. 12), and states that its forecasts assume the new controls are made by 2027 and the station is operational by 2029: "A shift to these timeframes would result in a shift in estimated economic activity" (p. 26).

Council has been advised that construction is anticipated to start in 2027, with completion "targeted for 2029, subject to approvals and funding" (Council report, p. 12). The proposed $15,000-per-dwelling transport levy also remains subject to indexation and feasibility testing (EIE, p. 26).

The market is already being tested. The Department's forecasts lean heavily on the market's response to the Low and Mid-Rise Housing Policy. Its economist reports that the policy "drove a flurry of market/development activity", mostly larger luxury apartments on elevated sites with harbour views (Economic Impact Assessment, p. 19), and developed its base case forecast on that recent pipeline (p. 26).

Nowhere is that response clearer than in Rose Bay. Council estimates that the policy alone creates capacity for around 2,470 additional dwellings in the Woollahra part of Rose Bay (Woollahra Municipal Council, Alternate Approach to the State Led Rezoning – Late correspondence memo, 21 August 2026 [Council memo], p. 3). From my own scrutiny of applications as a councillor, around 23 State Significant Development applications and development applications in Rose Bay have now been approved or are in the pipeline, many involving deep basement excavation in an area with a well recognised fragile hydrogeological profile (GHD Pty Ltd, Rose Bay Hydrogeological and Geotechnical Impacts Study, final report prepared for Woollahra Municipal Council, 31 July 2024), ageing infrastructure and existing flooding constraints. Council and residents are rightly concerned about how Rose Bay will cope.

That pipeline is competing for the same small pool of buyers the Proposal depends on. Council's property adviser, Savills, estimates that the Woollahra market can absorb at most 200 to 250 new apartments a year in the short term, and around 100 to 125 a year over the medium to long term (Council memo, p. 14). It notes that across all of Sydney there were around 2,996 apartment sales above $2 million in the past year, of which Woollahra will capture only a small share (p. 15). Rose Bay, Double Bay, Edgecliff and Woollahra are all drawing on that same narrow, high-end market. **Savills warns that releasing too much development capacity at once "can place downward pressure on sales values and adversely affect project feasibility"** (p. 13).

Nine Elms shows what happens when that warning is ignored. Supply of near-identical luxury flats outran demand, developers sold in bulk at discounts of up to 38%, and R&F Properties walked away

from two major schemes at heavy losses (section 2.2). **When projects stall or change hands, the public benefits tied to them stall too. For a Rezoning Proposal in which parks, community facilities and affordable housing depend on individual key sites being built, an oversupplied market is not just a risk to developers; it is a direct risk to the community.**

This is a strong reason to stage the rezoning. **Savills advises that a staged approach can support both infrastructure planning and development feasibility, provided the stages and their infrastructure milestones are clearly set out in advance, noting that it would "reduce the risk of excessive development capacity entering the market simultaneously".** It points to Green Square and The Hills Showground as precincts where staging has worked, and its modelling indicates that most sites remain feasible where rezoning is deferred by up to three years (Council memo, p. 13).

Council has itself recommended that any rezoning be implemented through a staged statutory framework, with a deferred rezoning mechanism that withholds additional capacity until the associated infrastructure is funded, programmed and legally committed, and with enforceable delivery triggers linked to dwelling and population growth (Council report, p. 2, Recommendations C, F and G).

The first stage should not take effect until the station is open. The road network is already struggling with existing levels of development. The Government's own transport plan concedes that "there are no current studies which have assessed intersections in the Woollahra area". It relied instead on Google Maps traffic data, which showed recurring congestion on New South Head Road, particularly westbound between Double Bay and Edgecliff in the weekday peaks (Transport for NSW, Edgecliff-Woollahra State-led Rezoning: Transport Management and Accessibility Plan, exhibited with the Proposal [TMAP], pp. 53–54). Its own modelling identifies the New South Head Road/Ocean Street intersection as "operating near capacity" (p. 101).

Council's traffic consultant found that the Oxford Street/Moore Park Road/Queen Street intersection is already over capacity, with a degree of saturation of 1.16, and that New South Head Road/Ocean Street is at capacity, at 1.00, today (SCT Consulting, Edgecliff-Woollahra Precinct State-led Rezoning: Traffic and transport review, including Scenario 3, 3 July 2026, slide 12, tabled as late correspondence to Council).

Council's own intersection modelling likewise found that New South Head Road has less than 7% spare capacity and that multiple intersections already operate near a degree of saturation of 1.0 (Council submission, PDF p. 215). Council staff advise that the Oxford Street/Moore Park Road/Queen Street intersection cannot realistically be improved without banning turns, closing approaches or grade separation, and that even at 3,600 dwellings the mitigation measures devised for 5,000 dwellings are still required (Staff memo, Item 16.7, p. 3). Half of all trips in the area are already made by car, against 12% by public transport (TMAP, p. 150).

Any credible traffic outcome for the Precinct depends on a large shift to public transport that only the new station can provide. If that shift does not happen, staff expect private vehicle traffic to grow and peak congestion to spread over longer periods, "given the network has a constrained capacity" (Staff memo, Item 16.7, p. 3). **Releasing uplift before the station opens would add traffic to roads that have no capacity left.**

Nine Elms illustrates how this plays out. Developer contributions of £266.4 million were directed to the Northern Line extension, which was delivered (The Guardian, 2021). Critics argue this came at the expense of affordable housing, where requirements were set well below London norms and later reduced further on viability grounds (The Guardian, 2021). The Pimlico bridge, which had no secured funding, was never built. **If the Woollahra Station is delayed, or if the levy is reduced after feasibility testing, the community needs to know in advance which commitments will give way. The Proposal does not say.**

5.7 Open space and community facilities fall far short of need

The Council's Social Infrastructure Needs Study records 31.1 hectares of public open space in the Study Area, or about 1.9 hectares per 1,000 people. Simply maintaining that rate would require an additional 19.4 hectares for 5,000 new dwellings and 38.8 hectares for 10,000 (Needs Study, p. 72).

The Study itself warns that new open space will be difficult to deliver given limited land and high acquisition costs (p. 72). Council staff go further. The 29-hectare deficit forecast for just 2,500 dwellings should not be read as "suggesting that 29ha of new open space could realistically be delivered", and the cost of land acquisition has not been estimated (Staff memo, Item 16.7, pp. 5–6).

The Study Area is already three sports fields short (Staff memo, Item 16.7, p. 4). The Government instead leans on the regional parks. The Social and Community Infrastructure Assessment, prepared by ATX Consulting for the Department, counts Centennial Park and Rushcutters Bay Park, 193.4 hectares, in its summary of existing open space provision, and calls connections to them "one of the most valuable investments" for the Precinct (Assessment, pp. 46, 74). Yet it concedes "relative proximity" should not be confused with "accessibility" (p. 45), noting that Centennial Parklands, while proximate, "is difficult to access" (p. 97).

As Council staff point out, regional parks such as Moore Park, Queens Park and Centennial Park "serve a much broader population catchment and therefore do not typically count towards local open space provisions" (Staff memo, Item 16.7, p. 5). **Being near a regional park is not a substitute for local open space. The ten small, developer-dependent parks in the IDP do not come close to closing that gap.**

The Social and Community Infrastructure Assessment confirms the scale of the problem and shows how the Proposal responds to it. **It describes public open space as "probably the most challenging aspect" of planning the Precinct, and expects that "much of" the Sydney Plan's 15% open space benchmark "will be existing open space that will require enhancement and embellishment"** (Assessment, p. 49). It also states that the focus in under-served areas is "not so much … on the quantity of space provided" (p. 72).

The Assessment's figures bear this out. The Master Plan adds 20,074 square metres of new public open space and counts a further 15,577 square metres of embellishment to existing parks (Assessment, Table 13, p. 79). Together these make up the EIE's "3.5 hectares". **On the Assessment's own table, total public open space per resident would roughly halve, from about 19.6 to about 9.3 square metres per person, as the population grows from 15,826 to 35,385** (pp. 60, 63, 79).

The Assessment's claim that the Precinct meets the Sydney Plan's 15% benchmark also relies on counting Lough Playing Fields and part of Cooper Park, which lie outside the rezoning area: it reports 17% on that basis, and 19% if all open space within 200 metres of the boundary is included (pp. 47, 80).

The new parks are small. The Assessment's own standard for high-density areas is a local or neighbourhood park of 0.15 to 0.5 hectares within 200 metres of every home (p. 49), and the Sydney Plan benchmark it adopts is a 400-metre walk to open space of at least 3,000 square metres (p. 47). Only three of the eleven new or extended spaces reach 3,000 square metres (Cliff Edge North, Jersey Road and Glenmore Road); the rest range from 283 to 2,151 square metres (Table 13, p. 79). The Social Infrastructure Needs Study recommends one to two quality neighbourhood parks of 0.3 to 0.5 hectares with road frontage and visibility (Needs Study, p. 89).

The embellishments to the existing parks are not straightforward and will likely be met with strong public opposition. At the Lough Playing Fields, the Assessment proposes six to ten multipurpose outdoor hard courts, a possible indoor recreation centre at the northern end, and floodlighting to increase capacity (pp. 73–74, 76). It acknowledges that Council's earlier plan for multipurpose hard courts "was met with substantial local resident opposition", due to concerns about noise, traffic and parking (p. 73).

At Moncur Reserve, the embellishment depends on a proposal to relocate the services of the Holdsworth Community Centre so that the reserve can become a larger park (p. 67).

Converting grass and informal open space into lit hard courts may increase capacity for organised sport, but it reduces the green, informal open space that residents value, and it adds no land.

Docklands also shows that public space only works if people want to spend time in it. Council's urban design review found that the Government's own wind assessment predicts "localised uncomfortable wind conditions" in the Queen Street and East Woollahra character areas, so that "the successful high street character and local commercial activity along Queen Street and Edgecliff Road" could be "seriously impacted", and that some new links and open spaces would be unsuitable for lingering at all (Council submission, pp. 151–152). **It also found that many of the master plan's own communal open spaces would not receive even two hours of sun in midwinter, and that overshadowing would extend to Trumper Park, Cooper Park and Woollahra Public School** (p. 154).

The proposed new local centre on Wellington Street, a minor side street that could achieve at most 50% active frontage, with ground-floor setbacks of 3 to 7 metres separating shops from the footpath, risks repeating Docklands' inactive ground floors (PDF p. 110).

At Nine Elms, the Linear Park arrived piecemeal as each site was built; at Docklands, parks had to be retrofitted at State expense. Docklands also shows that community facilities need ongoing operating funding, not just a building: the Neighbourhood House closed when its funding ended.

The Rezoning Proposal's community facilities are to be delivered as "warm shells" by developers (Economic Impact Assessment, p. 5), with no indication of who will fit them out or fund their operation. Existing facilities are already full: the Needs Study finds that Woollahra Library at Double

Bay has reached capacity and, within a mixed-use development, has "no room to move" (Needs Study, p. 48).

5.8 Capacity, delivery and cumulative impact

The Proposal provides theoretical capacity for 9,400 additional dwellings, but the Government's own economist estimates that only around 4,800 would be delivered between 2026–2046, and that around 4,000 dwellings of capacity already exists under current controls through the Low and Mid-Rise Housing Policy and infill bonuses (Economic Impact Assessment, p. 25). The case for doubling capacity, with the height and amenity impacts that entails, has not been made.

The Proposal also fails to consider the cumulative effect of the rezoning alongside the existing LMR Housing Policy and infill Affordable Housing Bonus take-up elsewhere in the municipality, particularly in Rose Bay and Double Bay, where development pressure is already significant.

Both case studies show the consequences of planning supply in isolation from the social infrastructure it depends on. Even Council's own Social Infrastructure Needs Study does not account for the cumulative impact of the State significant development and Low and Mid-Rise pathways, as staff confirm, and the high-level infrastructure cost estimate prepared by TCubed Consulting has not been made public (Staff memo, Item 16.7, pp. 4, 6–7). Council and the community are rightly concerned about how the wider municipality will absorb these combined pressures.

5.9 Flood infrastructure is unfunded and depends on developers

The same pattern applies to flooding. The Government's Flooding and Stormwater Report finds that much of the existing drainage network is already undersized for a 1-in-20-year storm (Rhelm, Edgecliff Woollahra Precinct State-led Rezoning: Flooding and Stormwater Report, Rev 04, 4 August 2026, p. 30). **It concludes that the precinct can take the proposed density only if it is retrofitted with three things: upgraded drainage pipes, nine overland flow corridors through private land, and a flood detention basin in Lower Cooper Park** (pp. 36–47).

None of the proposed flood mitigation measures are secured. Rhelm describes some of the upgrades as "Essential – required to support the rezoning" (p. ix). Yet the IDP assigns all $89.4 million of flooding and stormwater works to Council and local contributions, with timing "Following Development / Long Term (10+ years)" (IDP, pp. 4, 47).

The flood corridors, covering about a hectare of private land, would be secured only "through easements as redevelopment occurs" (EIE, p. 21), the same key-site model as the parks. And even with every measure in place, Council's engineers found that flood levels would still rise on downstream properties (Council submission, Appendix 12, PDF p. 252).

The detention basin is needed only because of the rezoning's own drainage upgrades.

Today the Lough Playing Fields act as an informal flood basin, holding back stormwater in heavy rain. The upgraded pipes would carry more water underground, past the playing fields and into the Double Bay Creek channel, raising flood levels downstream (Rhelm, pp. 46–47).

To hold that water back, Rhelm proposes using part of Lower Cooper Park as a detention basin. There would be no underground storage; the water would be held on the park itself. The large drain under the park, a 3.65 m × 1.45 m culvert, would be narrowed to a single pipe 0.6 metres in diameter. In heavy rain, stormwater that cannot fit through would rise out of the drain onto the park. An embankment about 2 metres high near Suttie Road would hold it there until it slowly drained away (Rhelm, pp. 46–47, Table 7-1, p. 50).

The design is not settled. Rhelm acknowledges that the basin "has been represented simplistically in the model at this stage". Even so, flood levels on Kiaora Road still rise, and Rhelm says only that these impacts are "expected to be able to be adequately managed" through "further refinement of this design" (p. 52).

The basin would cost residents a park and put a sensitive environment at risk. Council's engineers reject the basin for several reasons (Appendix 12, PDF p. 252):

- **Public safety. It would turn a flood-free recreation area into a high-hazard flood storage area up to about 2 metres deep.** Because the catchment above it is steep, it could fill rapidly in a storm, with little warning, while people are using the park. Its outlet is prone to blockage from bushland debris, and the consequences if the embankment failed have not been assessed. It may require dam safety approval.
- **Loss of the park. It would hold water several times a year, making the area unusable.** It would flood the adjacent car park, and the proposed surcharge pits would take up recreation space and detract from the park. Council would also bear the ongoing cost of clearing debris and sediment and of cleaning up after floods.
- **Unjustified. The basin was not recommended in Council's Double Bay Floodplain Risk Management Study and Plan**, and no benefit–cost analysis has been done.

The environmental risk has not been assessed. Cooper Park contains a patch of Littoral Rainforest, which is listed as critically endangered under the national Environment Protection and Biodiversity Conservation Act 1999. The park is also considered critical habitat for the threatened sunshine wattle (Eco Logical Australia, Edgecliff-Woollahra Precinct Biodiversity Assessment, 2026, pp. 10, 34). Yet the Government's Biodiversity Assessment does not consider the basin. Rhelm says only that it intends to retain all existing trees, but "this would need to be confirmed" once the design is settled (Rhelm, p. 47).

Council's stormwater harvesting system, which irrigates the park, draws water from the creek immediately upstream of the drain to be restricted, and Rhelm has not examined how the basin would affect it (pp. 54, 57).

Unlike Nine Elms and Docklands, this proposal would sacrifice assets the community already has. Nine Elms and Docklands were built on former industrial and port land, with little to lose; their failures were in what they did not deliver. The Edgecliff–Woollahra Proposal would take away what already exists. **Cooper Park is one of the parks the Government counts towards the precinct's open space, yet part of it would become flood storage for the precinct's development. The flood corridors would run through private gardens, and the drainage works needed to make the density work would fall to ratepayers a decade or more after the towers are built.**

The case studies' third lesson, that fixing it later costs the public, applies here in its most serious form. Infrastructure that should be planned and funded up front would be retrofitted later at public expense, and part of the price would be paid in heritage, parkland and bushland that cannot be replaced.

6. Changes requested

If the Department proceeds, the following changes are needed to avoid repeating the experience of Nine Elms and Docklands:

1. **Secure the public benefits before granting the uplift.** Key-site incentive controls should be tied to binding, costed obligations, with open space and community facilities dedicated before occupation certificates are issued. The IDP should replace "$" placeholders with costed figures.
2. **Write heritage and canopy protections into the instrument.** Adopt GML Heritage's recommendations as statutory controls, exclude the Low and Mid-Rise Housing Policy from the Precinct as GML recommends, and require no net loss of tree canopy, with retention of mature trees rather than reliance on replacement planting.
3. **Reserve land for schools now.** The Department and Schools Infrastructure NSW should identify and protect land for primary school expansion and a public secondary school serving the Precinct and the wider LGA, before the rezoning is finalised.
4. **Raise the affordable housing contribution rate and require on-site delivery.** The base rate should be lifted substantially, with Waterloo South as the benchmark the Department itself has endorsed. Contributions should be delivered as dwellings onsite, not as cash, and no key site should be exempt.
5. **Rule out viability-based reductions.** The final instrument should state that affordable housing and public benefit obligations cannot be reduced later on viability grounds, as occurred at Battersea Power Station.
6. **Fund community facilities to operate, not just to be built.** Warm-shell facilities should come with a committed fit-out and operating funding arrangement.
7. **Stage the rezoning and sequence it to infrastructure.** Release the uplift in clearly defined stages, announced in advance, with each stage triggered by infrastructure milestones and by evidence that the market is absorbing the previous stage. No stage of the uplift, including the first, should take effect until Woollahra Station is complete and operating, and the transport levy rate should be fixed before the controls are made. Staging should take account of the development already under way in Rose Bay and Double Bay under the Low and Mid-Rise Housing Policy.
8. **Require a genuine dwelling mix across the Precinct.** The unit-mix control should apply throughout the Precinct, not only within 200 metres of the stations.
9. **Address open space properly.** Set a no-net-loss open space target per resident and identify land and funding to meet it.

10. **Assess cumulative impact.** Model the combined effect of the rezoning, the LMR Housing Policy and the infill Affordable Housing Bonus across the municipality, including in Rose Bay and Double Bay, before finalising controls.
11. **Right-size the capacity.** Reduce maximum heights and FSRs to a level consistent with the Government's own realistic delivery estimates. Nine Elms shows that an approval for a building higher than the planning controls becomes the benchmark for the next; 34-storey controls here would set that benchmark for the whole eastern suburbs.
12. **Fund and deliver flood infrastructure before the uplift, without sacrificing parkland.** The essential drainage works, and the downstream works outside the Precinct on which they depend, should be State-funded and delivered before any uplift takes effect.
13. **Abandon the Lower Cooper Park detention basin.** The extra flows it was meant to hold back should be managed within development sites, for example through on-site detention, with modelling showing that flood levels will not rise on downstream properties. If any form of the basin is retained, it should not proceed without a full assessment of its safety, its impact on the park's use and its impact on Cooper Park's critically endangered rainforest and threatened species.
14. **Secure overland flow corridors as public land,** zoned for drainage or recreation, or acquired and costed, rather than left to easements over private land as sites happen to redevelop.

7. Conclusion

Nine Elms and Docklands show that a developer-led rezoning can deliver towers, and sometimes headline infrastructure, while failing on the things that make a place liveable: schools, affordable homes, open space, community facilities and a housing product that serves residents rather than investors. Where those failures have been fixed, it has been at public expense and decades later.

The Edgecliff–Woollahra Proposal is built on the same model and, on the evidence of its own supporting documents, carries similar risks, and adds others of its own. It would degrade the heritage and green, leafy character that make Woollahra a place people want to live. And its complicated, unfunded and unproven flood mitigation measures would degrade parkland and bushland and put public safety at risk.

I ask the Department not to proceed with the Proposal in its exhibited form, and to adopt the changes requested above before any rezoning is finalised.

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