Objection to the Edgecliff-Woollahra Precinct State-led Rezoning Proposal

Submission by Residents First Woollahra

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About Residents First Woollahra

Residents First Woollahra is an umbrella group for independent (non major party affiliated) councillors on Woollahra Council. Our Councillors currently represent residents in all five Wards, including Cooper Ward, which covers Woollahra and Edgecliff.

Formerly known as the Woollahra Action Committee, Residents First and its predecessors have represented local residents on Council for more than 40 years. Our broad objectives are to:

- prevent overdevelopment;
- safeguard local heritage and special character areas;
- protect the foreshore environment and open space; and
- improve local facilities and services.

These are the matters this proposed rezoning puts most at risk.

Executive summary

Residents First objects to the Edgecliff-Woollahra Precinct State-led Rezoning Proposal (the Rezoning Proposal) and asks that it not proceed in its exhibited form.

We do not oppose more housing in Woollahra. We oppose a rezoning that creates capacity for about 9,400 additional dwellings, almost double the Government's own 20-year delivery forecast of up to 4,800, without the evidence, infrastructure funding or protections needed to make that growth work. Our residents are owners, renters and small business operators. They will have to live with the consequences of multiple poor planning decisions if the Rezoning Proposal proceeds.

Our objection is informed by Woollahra Council's detailed submission, Edgecliff-Woollahra State-led Rezoning – Council Submission (September 2026), endorsed by Council at its extraordinary meeting on 30 September 2026 and cited here as "Council submission"; the independent peer reviews Council commissioned to inform its submission and its Alternative Approach; and the Government's own exhibited technical studies.

This objection supports the Council's findings, but also draws attention to the following additional evidence to support its conclusion that a rezoning of this scale is both impractical and irresponsible:

- **The station levy will not pay for the station.** At realistic delivery rates, the $15,000-per-dwelling levy would raise a fraction of even the reported minimum cost of Woollahra Station (section 3).
- **The flood strategy doesn't hold water.** The drainage network already fails in a 1-in-20-year storm. The $89.4 million of projected flood mitigation works is left to Council, 10 or more years after development, and flood levels still rise downstream even with every mitigation built (section 8 and our supplementary submission on flooding).
- **Even 3,600 additional dwellings overload the roads.** Council's traffic consultant tested lower yields, and four intersections still fail (section 4).
- **Sydney Water's servicing advice reversed without explanation.** No capacity in 2023, capacity "found" in 2025, and the advice has never been published (section 3).
- **The Government's rail capacity figures contradict each other.** "High capacity" in 2023; "only 43 per cent utilised" in 2026 (section 4).

- **The Rezoning Proposal's affordable housing contribution rate is a fraction of the rate recommended by the Government's own consultant for an adjacent local government area.** Atlas Economics recommended a 20 per cent affordable housing contribution rate for the neighbouring City of Sydney Council area, but only a 3 per cent base rate for the Rezoning Proposal (section 9).
- **Key protections are unenforceable.** The Draft Design Guide contains errors and carve-outs that allow its key protections to be set aside (section 5).
- **Density and heritage are not in conflict.** Woollahra, Paddington and Potts Point already house people at medium to high densities within Heritage Conservation Areas. The proposal would reach even higher densities by demolishing the heritage and leafy streetscapes that, on the Government's own economic evidence, underpin Woollahra's appeal (section 6).
- **Zoning is not what is holding back housing supply.** Independent evidence shows that finance, presales, land costs and interest rates, not planning controls, determine how many homes are built (section 1).
- **The Government ignores its own cumulative impact guidelines.** It requires individual developments to assess cumulative impacts, but does not apply the same test to the Rezoning Proposal (section 10).
- **The rezoning was championed by the development lobby.** Its design closely reflects positions the industry has long advocated, while the industry's own test for a business case has not been met (section 2).
- **The Council's Alternative Approach is a better starting point for accommodating growth around the proposed new Woollahra Station.** But it also highlights that the Edgecliff-Woollahra Precinct will struggle to accommodate even 2,200 to 3,600 additional dwellings (section 11).

The proposal at a glance

- **Additional dwelling capacity.** About 9,400, against a 20-year forecast of up to 4,800, of which about 2,400 could be built under existing controls (Council submission, pp. 6, 26).
- **Existing homes to be acquired.** About 2,860 homes on 653 properties, many strata-titled (Council submission, p. 130).
- **Towers.** 142, up to 34 storeys (Council submission, pp. 48–49).
- **Heritage.** 191 contributory buildings likely demolished; 26 heritage items isolated (Council submission, p. 122).
- **Open space.** About 2 hectares genuinely new (Council submission, p. 123).

- **Tree canopy.** About 25 per cent (9.5 ha, more than 900 trees) lost or affected (Council submission, p. 124).
- **Infrastructure.** $1.33 billion, with no funding model (Council submission, p. 33).
- **Flooding.** Downstream levels rise by more than 10 mm even after $90 million of mitigation (Council submission, pp. 251–252).
- **Affordable housing.** Close to 500 older apartments at risk, for the equivalent of 144 affordable homes (Council submission, p. 193).

Our requests to the Minister and the Department

1. **Withdraw the exhibited proposal.** Any rezoning should begin from a much smaller first stage, informed by Council's Alternative Approach and subject to the conditions outlined in section 11.
2. **Make Woollahra Station a legal precondition.** Publish its business case, costings and funding, with an enforceable delivery timetable, before any rezoning is gazetted.
3. **Publish a funding model.** Show how the forecast $1.33 billion infrastructure package and the station will be paid for at realistic delivery rates of 2,400, 3,600 and 4,800 dwellings, and explain how funding gaps will be paid.
4. **Stage the rezoning.** Release uplift only when the infrastructure it depends on is funded and delivered.
5. **Publish the servicing and rail evidence.** Release Sydney Water's servicing advice, and Transport for NSW hourly train loading data for the AM peak.
6. **Make protections enforceable.** Put essential protections into the statutory instrument, not the Design Guide. These include heights, setbacks, deep soil, canopy, heritage transitions, dwelling mix, solar access and open space dedications.
7. **Protect heritage.** Adopt all of GML Heritage's recommendations and retain contributory buildings.
8. **Secure open space as land.** Zone it RE1 or nominate it for acquisition, and state the need in hectares.
9. **Investigate the ground before rezoning.** Complete a precinct-scale hydrogeological and geotechnical investigation, including a detailed assessment of the risks to the Eastern Suburbs Railway tunnels.
10. **Manage flood risk.** Comply with the Ministerial revised flood planning direction and abandon the Lower Cooper Park detention basin.

11. **Deliver affordable housing on-site.** Set rates reflecting Woollahra's feasibility, ensure no net loss of existing affordable homes, and keep the in-fill affordable housing bonus switched off in the precinct.
12. **Assess cumulative impact.** Cover every growth pathway within and around the precinct.
13. **Assess the costs, not just the benefits.** Prepare a full economic cost-benefit analysis, a social impact assessment, and an assessment of hospital and emergency service capacity.
14. **Consult all relevant agencies and publish their advice.** Consult Heritage NSW and the Heritage Council of NSW, and publish the advice of NSW Health, the Department of Education and the emergency services.
15. **Re-exhibit properly.** Exhibit any revised proposal for at least 42 days, with the station business case, the funding model, Sydney Water's advice and draft planning provisions together.

1. A target-led proposal, not an evidence-based one

The number came first and the studies followed. The Government announced the proposed new Woollahra Station and up to 10,000 dwellings in August 2025, before any transport, infrastructure, heritage or urban design investigations had been done (Council submission, p. 14). Council's applications for information, including the station business case, have been with the NSW Information and Privacy Commission on external review since 18 December 2025, more than ten months, without a decision (pp. 13–14).

The resulting capacity of about 9,400 dwellings is nearly double the Government's own 20-year forecast of about 4,800 dwellings, with its Economic Impact Assessment conceding that the forecast "would reflect approximately half of the total theoretical capacity identified in the draft Master Plan" (Atlas Economics, Economic Impact Assessment, September 2026, p. 25).

A report Council commissioned on development feasibility from Savills estimated demand across the entire LGA at only 120–150 units a year, or 2,400–3,000 over 20 years (Savills, Review of the Economic Impact Assessment of the Edgecliff Woollahra State led Rezoning, September 2026, Appendix 4 to the Council submission, p. 169; Council submission, pp. 23–24). In answers to Councillors, Savills put short-term absorption at no more than 200–250 new apartments a year, falling to around 100–125 a year over the medium to long term (Council memo, p. 14).

Whilst we accept that capacity should exceed demand, because some land may never be redeveloped, no explanation has been given for why capacity for 9,400 dwellings is needed.

Zoning is not what is holding back housing supply

Approvals are not the main delay. Planning approval accounts for a quarter or less of apartment development time; presales and finance matter more (Glen Searle, "Sydney's New Housing Supply Policies: A Review", Urban Policy and Research, vol. 44, no. 2, 2026, p. 218).

Rezoning alone does not deliver. By June 2026, only around 4,400 homes had been approved under the Transport Oriented Development (TOD) program, against more than 170,000 expected over 15 years (NSW Government statement on TOD approvals, June 2026).

Upzoning raises land costs and does not necessarily lead to more affordable accommodation being built. Rezoning lifts site values, so developers pay heavy premiums to amalgamate sites, pushing projects towards the luxury end of the market (Ruth Gallagher, Griffith University, Misaligned Policy and Practice, 22 April 2026).

Feasible capacity is taken up slowly. The Department's own Feasible Housing Capacity Policy notes that even on highly feasible sites, only around 20 per cent have a development application lodged within five years (p. 13, cited by Savills in Woollahra Council's Alternative Approach – Late correspondence memo, 21 August 2026 ("Council memo"), p. 15).

Analysis for NSW Treasury found Woollahra the most financially feasible suburb in Sydney for new apartments, yet delivery remains slow because the top end of the market can absorb new stock only so quickly (Searle 2026, pp. 225–226).

Supply peaked under existing controls. Greater Sydney completed more than 42,000 homes in each of 2017–18 and 2018–19, under essentially the controls the Government now blames for holding supply back (Department of Planning and Environment, Explanation of Intended Effect: Changes to create low and mid-rise housing, December 2023). Completions have since fallen primarily because of interest rates and construction costs, not planning rules (Productivity Commission, Housing supply regulation – Interim report, July 2026, p. 5).

New homes will be premium homes, out of reach for moderate income earners. The Economic Impact Assessment expects the delivery of a premium product that will be out of reach for average income earners, yet contains no modelling of prices or rents (Atlas Economics, Economic Impact Assessment, pp. 21, 30).

Research suggests that cheaper apartments are typically the first to be replaced by premium stock (section 9).

Woollahra is already dense, and not a greenfield site. Woollahra is the seventh most densely populated LGA in NSW, and 78 per cent of the precinct's housing is

already medium or high density (Council submission, p. 19; Council report, 30 September 2026, p. 7).

Other growth precincts start from almost nothing. Bradfield is planned for about 10,000 dwellings on 114.6 hectares of largely vacant land, with 36 hectares of open space. Edgecliff-Woollahra is already home to about 16,000 people and has no vacant land (Cred Consulting, Edgecliff and Woollahra Social Infrastructure Needs Study, commissioned by Woollahra Municipal Council, March 2026, p. 72).

The Urban Design Report's density comparisons, which include Erskineville, Central Park and Zetland, are misleading because they were built on former brownfield sites (Council submission, PDF pp. 112–113). The Explanation of Intended Effect (EIE) cites no examples of comparable density achieved by amalgamating hundreds of small, strata-titled and heritage-affected lots on steep terrain in what is already one of the most densely populated Local Government Areas (LGAs) in NSW.

About 10,800 additional dwellings could be delivered across the area of influence under existing pathways, without any rezoning (Council memo, p. 4).

Council exceeded its previous district housing target by 82 per cent (Council submission, p. 29), and approved 958 new dwellings in 2024/25.

The Economic Impact Assessment only considers the benefits of the Rezoning Proposal

The Economic Impact Assessment (EIA) is the Government's main economic justification for the Rezoning Proposal, but it is not a cost-benefit analysis. Its input-output modelling counts construction activity, jobs and household spending (p. iv), but not the costs, which include:

- commercial business disruption from at least two decades of continuous construction activity;
- the impact on the Woollahra LGA's visitor economy, which in 2024/25 generated about $1,307.5 million in tourism sales (.id economic profile, "Tourism value"), and
- the likely paralysis of the real estate market, which relies on "the appeal of the heritage values and leafy streetscapes" to sell new apartments. (A Domain article discusses the upheaval to the Rose Bay real estate market caused by the LMR and the utilisation of the Affordable Housing Bonus to maximise height and floor space ratio, see Sue Williams, “Sydney's abandoned 'ghost' train station back in the spotlight as potential housing hotspot”, Domain, 23 February 2026).

The EIA concedes an unquantified "potential loss of neighbourhood character" (p. v), and inexplicably calls construction impacts "short-term" (p. iv) while modelling development over 20 years.

2. A rezoning championed by the development lobby

The Rezoning Proposal delivers on a long campaign conducted by the property development lobby to open Woollahra's premium property market to high-rise development. The Government should decide it on the evidence, including the advice of its own consultants, not on industry advocacy.

Long-standing advocacy. Urban Taskforce Australia, which represents major property developers and equity financiers, told the 2024 parliamentary inquiry that leaving Edgecliff and Bondi Junction out of the TOD program because of recognised capacity constraints "clearly raises significant questions" (Urban Taskforce, Submission No. 125 to the Legislative Council inquiry into the TOD Program, 27 March 2024 ("Urban Taskforce 2024")).

Support ahead of the announcement. Its chief executive, Tom Forrest, publicly backed completing the Woollahra “ghost” station in July 2025, weeks before the Government's announcement (7 News interview, reposted by Urban Taskforce, 12 July 2025), and welcomed the rezoning as the Government "staring the NIMBYs down" (Urban Taskforce, media release, 25 August 2025).

A premium market. Mr Forrest has described Woollahra as ideal for new housing because of its amenity, beaches, views and shopping (Williams 2026). His description of the desirability of the area is consistent with the Government's own forecast that new dwellings will be out of reach of average earners (EIA, p. 30). In fact, the median house price, according to the latest Domain House Price Report, is $4.91 million, well above Sydney’s median of $1.76 million, while the median unit price is $1,462,500, as against Sydney’s general $844,390 (Williams 2026).

Positions reflected in the Rezoning Proposal. Urban Taskforce has also asked the Government to make strata buildings easier to redevelop, describing older walk-up apartments as having lower standards and amenity, and has also sought greater information-sharing with the development sector on TOD precincts (Urban Taskforce 2024). It argues that affordable housing contributions "just push up the price for all other home purchasers" (Urban Taskforce, 25 August 2025).

The exhibited proposal opens close to 500 older strata apartments to redevelopment, sets a 3 per cent affordable housing contribution base rate, and relies on servicing advice for essential infrastructure that Woollahra Council and the community have not been allowed to see.

The industry's own test has not been met. Urban Taskforce insisted that "approving large investment in public transport needs to be accompanied by a business case that justifies the investment" (Urban Taskforce 2024). No business case for the proposed Woollahra Station has been published.

3. Unfunded infrastructure and an uncosted station

The infrastructure package is a list of needs, not a plan to meet them. Growth would be switched on first and paid for later, if at all.

The station levy will not pay for the station

Development within 800 metres of Woollahra Station will pay a Transport Project Component contribution of $15,000 per dwelling, or $200 per square metre of new commercial floor space, towards the station (NSW Government, "First look: Woollahra long-term housing transformation", media release, September 2026). Because the levy is paid per dwelling built, what it raises depends on how many homes are actually delivered:

Dwellings delivered	Levy raised	Share of a $193m station
2,400 (possible under existing controls)	$36 million	19%
4,800 (Government's 20-year forecast)	$72 million	37%
9,400 (full capacity)	$141 million	73%

These figures are our calculations, and they overstate the revenue, because the levy applies only within 800 metres of Woollahra Station, not across the whole precinct.

The station's cost has not been disclosed. The Infrastructure Delivery Plan lists it only as "$$$", State-funded (MM Australia, Infrastructure Delivery Plan, p. 43). When the station was announced, the reported minimum price was $193 million (The Urban Developer, August 2025). At that figure, the levy would need about 12,900 dwellings to cover it, more than the precinct's entire capacity.

The money arrives after the station. The station is due to open in 2029, but the levy is collected only as homes are built over 20 years. Taxpayers will forward-fund the station, and the Government has not explained how much it expects to recover.

The levy rests on unrealistic delivery. At Savills' estimate of 120–150 new units a year across the whole LGA (Council submission, pp. 23–24), the levy would raise only about $2 million a year, even if every new unit in the LGA were within the levy area (our calculation).

$1.33 billion with no funding model The Infrastructure Delivery Plan identifies about $1.33 billion of works, roughly $556 million assigned to developers, $462 million to State agencies and $314 million to Council, with no funding model (Council submission, p. 33). The infrastructure is justified by 9,400 dwellings of capacity but must be funded by the far smaller number expected to be built (p. 37). Transport initiatives are not tied to development triggers (Transport Management and Accessibility Plan, s. 8.3).

Water and sewerage: an unexplained reversal

2023: no capacity. The Planning Minister said Edgecliff was excluded from the TOD program because of limited sewerage and water infrastructure (Michael McGowan, "Minister reveals why Sydney's eastern suburbs were spared housing density push", Sydney Morning Herald, 11 December 2023).

2025: capacity found. The Minister told Budget Estimates that Sydney Water had re-examined the issue and found capacity, and that he could not say why the advice had changed (Budget Estimates, 25 August 2025, corrected transcript).

Still secret. At the Legislative Council's TOD inquiry, the Department said its servicing information had been presented in a commercial-in-confidence Cabinet setting, and Sydney Water declined to name sites needing investment because further TOD sites could be announced (corrected transcript, 24 July 2024, pp. 2, 4, 18).

That reason no longer applies. With Ku-ring-gai's alternative finalised in November 2025, the last of the 13 TOD councils has joined the program (The Urban Developer, 2026). Neither the 2023 nor the revised advice has been released.

A known constraint, already failing. The precinct drains to the Bondi Water Resource Recovery Facility, Sydney Water's oldest treatment plant, operating since 1953. It "was originally designed to serve 250,000 people, but now serves an equivalent population of over 780,000", and Sydney Water plans a decade of investment in the plant and the Bondi system (Sydney Water, "Bondi WRRF resilience system investment planning").

Council's Local Housing Strategy, endorsed by the Department of Planning in 2022, identifies roads and the sewer system as constraints on housing (p. 14), and sewage already overflows in heavy rain into swimming sites such as Redleaf Beach and Rose Bay Beach (Woollahra Council, "Harbour water quality").

Retrofitting is slow, costly and disruptive. Sydney Water is already retrofitting the area just to serve today's population. Its Refresh Vaucluse and Diamond Bay project diverts Sydney's last three ocean outfalls, which discharge around four million litres of untreated wastewater off Vaucluse and Diamond Bay, to the Bondi plant.

Construction began at Parsley Bay in mid-2024. The Parsley Bay car park and Horler Avenue have been closed since May 2024, Carlisle Street in Rose Bay has been one-way since May 2026 while a new pipeline is laid, and Ian Street and Ian Lane were disrupted from June to August 2026.

The Diamond Bay stage, including a pressure pipeline along Old South Head Road, was due to start in late September 2026 and is not expected to finish until mid-2028. In June 2026, Sydney Water added further works on Old South Head Road to increase the capacity of the wastewater network (Sydney Water, "Refresh Vaucluse and Diamond Bay").

The project was announced in 2018 at a cost of $86 million (The New Daily, 4 November 2018); its current cost has not been published.

A decade from announcement to completion, months of road closures and an undisclosed final cost: that is what fitting essential infrastructure into an established suburb involves. The Government has not said what further upgrades thousands of new homes would require, what they would cost, or how long residents would live with the construction disruptions.

Thousands of dwellings should not be connected to this network on the strength of advice no one from outside Government has seen. Council cannot prepare the contributions plan the Government expects of it (Infrastructure Delivery Plan, p. 51) without that evidence.

Schools

About 2,160 additional school-aged children are forecast, but no new school is planned (Council submission, p. 208), and up to 1,021 additional high school places may be needed (Cred Consulting, p. 87).

Confidence in the Government's commitment to monitor and respond to public school demand is understandably not high. Homebush's TOD plan, for example, lost two schools and provided none for 16,100 new dwellings (Searle 2026, p. 225).

Electricity supply

Woollahra Council has estimated that about 38 MVA of new electrical demand would require zone substation upgrades (Council submission, pp. 69–70). Already, the appearance of streetscapes in Double Bay and Rose Bay has been sullied by large electrical kiosks.

Hospitals and emergency services

The proposal would add around 19,000 people with no assessment of hospital capacity, ambulance demand or emergency response times, and no health or

emergency infrastructure in the Infrastructure Delivery Plan (Council submission, pp. 91–92).

NSW hospitals face severe "bed block" from patients awaiting aged care or NDIS placements, which the Health Minister has described as growing at an unsustainable rate (Nathan Schmidt, "Number of patients stranded in NSW hospitals expected to surge by June 2027", news.com.au, 9 September 2026). The main district hospital, Prince of Wales, is among the lower performers on emergency treatment times (Isabella Ross, "Sydney hospitals with highest attendances at emergency departments revealed in new BHI report", ABC News, 9 September 2026). NSW Ambulance, Fire and Rescue NSW, the Police and the SES are not listed as consulted.

The wrong sequence

The Government's own model is Epping: the rail link opened in 2009, the controls followed around 2014, and take-up then averaged more than 500 dwellings a year (EIA, p. 26). The station came first. Here, uplift would be permitted from 2027 (Council submission, p. 31), while the station's 2029 opening remains "subject to approvals and funding", with no plans or business case exhibited (Council report, p. 12).

4. Unconfirmed and contradictory traffic and rail capacity

The roads serving the precinct are already at or over capacity and cannot be widened (Council submission, p. 7). Council's own modelling of 16 key intersections found New South Head Road has less than 7 per cent spare capacity, and the Oxford Street / Moore Park Road / Queen Street intersection already operates above capacity (PDF p. 215). The Government's transport plan does not test what the proposal would do to them.

Google Maps instead of studies. The Transport Management and Accessibility Plan concedes that no current studies have assessed intersections in the area. Its authors reviewed Google Maps traffic data instead of conducting physical traffic studies to measure level of service or degree of saturation (p. 53). Even that review found recurring congestion on New South Head Road and Ocean Street.

Lower dwelling yields still cause the road network to fail. SCT Consulting, Woollahra Council's traffic consultant, tested lower-yield scenarios for Council's Alternative Approach. Even at 3,600 dwellings, four intersections exceed capacity in at least one peak (degree of saturation above 1.0 means queues keep growing) (SCT Consulting, Traffic and transport review – Scenario 3, 3 July 2026, slide 12):

Intersection	Today	5,000 dwellings	3,600 dwellings
New South Head Rd / Mona Rd	below 1.0	1.18	1.15
New South Head Rd / Ocean St	1.00	1.08	1.08
New South Head Rd / Manning Rd	below 1.0	1.12	1.09
Oxford St / Moore Park Rd / Queen St	1.16	1.23	1.23

Delays more than double. At 5,000 dwellings, the evening intersection delay from the city via New South Head Road rises from 1 minute 8 seconds to 2 minutes 40 seconds (slide 11).

No fix for the worst intersections. SCT could not identify workable solutions at New South Head Road / Ocean Street or Oxford Street / Queen Street. Because the latter sits at 1.23 at both 5,000 and 3,600 dwellings, its congestion appears to be at least partly driven by regional through-traffic.

Council staff confirmed that the Oxford Street / Moore Park Road / Queen Street intersection cannot realistically be improved without banning turns, closing approaches or grade separation (Staff memo, Item 16.7, p. 3).

The Government should say who will fix key intersections and the road network before facilitating additional demand.

Everything depends on the station. These results assume public transport use by new residents rises from 34 to 49 per cent (slide 5). Without the station, outcomes would be worse. If the shift does not happen, staff expect car 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).

The Government's rail capacity figures contradict each other

2023: "high capacity". Explaining why Bondi Junction and Edgecliff were left out of the TOD program, the Planning Minister's office used Opal data to show the T4 eastern suburbs train line was already at "high capacity" (Michael McGowan, "Minister reveals why Sydney's eastern suburbs were spared housing density push", Sydney Morning Herald, 11 December 2023).

2026: "only 43 per cent utilised". The exhibited transport plan now says the T4 line is only 43 per cent utilised in the morning peak inbound (Transport Management and Accessibility Plan, p. 32). The Government has not explained the change.

An average hides the peak. The 43 per cent figure is averaged across the whole morning peak, while the plan's own data shows Edgecliff boardings peaking sharply at 8am (pp. 145–146, figure B.8).

The Government should publish train loading data by hour and line segment for the AM peak.

5. Carve outs in the Draft Design Guide undermine objectives

We endorse Council's urban design findings: 142 towers with no logical relationship to the ridgeline (Council submission, pp. 46–49), a Draft Design Guide that contradicts the master plan in every character area (pp. 136–146), and a new local centre on Wellington Street that is likely to fail (pp. 109–115). The scale of change is shown by the largest height increases (Explanation of Intended Effect, September 2026):

Location	Height	Storeys	Floor space ratio
Edgecliff Station site	114.4–120.7 m	30–34	9.0:1
Woollahra Station site	108.6–109.4 m	30–34	3.3–3.5:1
New South Head Road	74.2–102.5 m	18–34	4.3–6.0:1
Ocean Street	42.2–90.2 m	12–29	2.6–3.1:1

We add the following:

The dwelling mix adds up to 120 per cent. The Draft Design Guide requires 20 per cent studios, 30 per cent one-bedroom, 50 per cent two-bedroom and 20 per cent three-bedroom apartments within 200m of the train stations (Draft Design Guide (September 2026), p. 17, table 3). An error of this kind for a central housing control raises questions about quality assurance.

The mix can be set aside anyway. Variations are allowed if an applicant provides "an authoritative analysis of current and future demand" (Draft Design Guide, p. 17). Applicants routinely commission such analyses.

The solar access promise has the same escape clause. The Draft Design Guide promises to protect solar access to existing dwellings and parks, then allows for more overshadowing if a development complies with the envelope controls and is supported by "an authoritative analysis" (p. 18). The envelopes create the shadow, and compliance with them excuses it.

"Incentive" controls in name only. The tallest heights are framed as incentives for sites that amalgamate or provide public benefits. In practice, that is how most of the precinct's capacity would be delivered.

Guidance can be argued around. Master plans placed in development control plans act only as guidelines, so taller buildings can still be approved. **Around 80 per cent of Housing Delivery Authority applications seek a rezoning to get around existing controls** (Searle 2026, pp. 219, 224–225).

Enforceable controls work. Serious defects affected 53 per cent of strata buildings registered between 2016 and 2022, but have trended down since 2020, when the Design and Building Practitioners Act and related legislation made standards enforceable (Building Commission NSW and Strata Community Association NSW, 2023 Strata Defects Survey). Quality improved when controls became law, not when they were left to discretion.

Our requests: set heights, setbacks, deep soil, heritage transitions, dwelling mix and solar access in the statutory instrument; correct the dwelling mix table; and redo the Visual Impact Assessment, which excludes heritage and conservation area views (Council submission, p. 53).

6. Attributes that underpin the area's desirability – heritage and leafy streetscapes – are severely impacted

We endorse Council's findings: 310 contributory buildings affected, 191 likely to be demolished and 26 heritage items isolated, which would likely push the Woollahra Heritage Conservation Area below the threshold for listing (Council submission, PDF p. 122; p. 59). Neither Heritage NSW nor the Heritage Council was consulted, despite seven State Heritage Register items in the precinct (pp. 91–93).

Even a far smaller scheme would harm the heritage conservation areas. Council's Alternative Approach, at 2,200 to 3,600 additional dwellings, was designed around heritage, canopy and topography. Yet Council's heritage staff advise that it would have a negative impact on the heritage values of the Woollahra Heritage Conservation Area that is "unavoidable if seeking to permit a substantial increase in density", with "more modest negative impacts" on the Paddington Heritage Conservation Area (Staff memo, Item 16.7, p. 8).

About 26 contributory buildings would most sensibly be assumed to be demolished under that scheme (pp. 7–8). The State's proposal carries between two and a half and four times that yield, and affects around 310 contributory buildings**. If a heritage-led scheme of 3,600 dwellings cannot avoid harm, then obviously this Rezoning Proposal will do far greater damage.**

Density and heritage are not in conflict

The Rezoning Proposal treats more homes and heritage protection as a choice between the two. Sydney's inner east shows that this is a false choice. Its densest suburbs are also among its most heritage-protected:

Suburb	People per km² (2021)	Heritage context
Elizabeth Bay	about 19,500	Largely within heritage conservation areas, with several State Heritage Register items
Darlinghurst	about 12,400	Largely within heritage conservation areas
Potts Point	about 11,500	Largely within heritage conservation areas
Paddington	about 7,800	Australia's first conservation area, declared in 1968
Edgecliff	about 7,800	Within the precinct
Woollahra	about 5,800	Woollahra Heritage Conservation Area, within the precinct

Source: ABS, 2021 Census QuickStats (Suburbs and Localities), rounded.

Woollahra is already dense. Woollahra houses about 5,800 people per square kilometre and Edgecliff about 7,800, the same as Paddington. Seventy-eight per cent of the precinct's housing is already medium or high density (Council report, 30 September 2026, p. 7). Much of it is in older apartment buildings, including the close

to 500 smaller apartments now on redevelopment sites (section 9). That density has been achieved alongside heritage conservation, not at its expense.

Density does not require height. Paddington, Australia's first heritage conservation area, houses more people per square kilometre than Woollahra does today, largely in two- and three-storey terraces.

The Rezoning Proposal reaches higher density only by demolition of contributory buildings in the Heritage Conservation Areas. It would take Woollahra to about 16,700 people per square kilometre (Council submission, p. 19), denser than Potts Point or Darlinghurst. Those suburbs achieved their density within their heritage conservation areas. The proposal would achieve it by removing 191 contributory buildings, likely pushing the Woollahra Heritage Conservation Area below the threshold for listing.

Form, not numbers, decides compatibility. What makes density work with heritage is fine-grained buildings, retained streetscapes and height located away from contributory fabric. Those are the conditions the Department's own heritage consultant set out (below), and the conditions the Rezoning Proposal fails to secure.

The Department's own heritage consultant set conditions that are not met

Recommendations ignored. Most of GML Heritage's recommendations, numbers 2 and 4 to 12, were not adopted in the Rezoning Proposal (Council submission, pp. 55–56).

Four conditions. GML said the Rezoning Proposal may be supportable only if yield is concentrated on fewer sites, uplift is constrained in sensitive areas, contributory fabric is retained, and cumulative impacts are managed through statutory controls (GML Heritage Assessment, s. 7.1). None of these conditions were adopted.

Cumulative impact is the real risk. GML identifies the principal risk as the cumulative loss of contributory fabric, which is exactly what the Rezoning Proposal allows. It warns that "contributory clusters" are no substitute for site-by-site assessment (Council submission, p. 57). Quambi Place, where ten of twelve lots are heritage items or contributory, is labelled a "non-contributory cluster" (p. 58).

Unlisted “heritage” buildings at risk. GML recommends heritage assessment before demolition of any unlisted building more than 50 years old (Recommendation 10), acknowledging that no comprehensive heritage study will precede the rezoning, and heritage worthy items may have been missed.

Transferred floor space. GML proposes letting about 19 heritage houses sell unused floor space for extra height elsewhere (Recommendation 11). Residents have not been told where that height would land.

Council's 2021 Aboriginal Heritage Study identifies the Woollahra Station site as an area of Aboriginal Heritage Sensitivity. The recommended Aboriginal Cultural Heritage Assessment has not been done (Council submission, pp. 61–62).

Our requests: adopt all of GML's recommendations; retain contributory buildings; publish an address-by-address list of buildings affected; and complete the Aboriginal Cultural Heritage Assessment before rezoning.

7. Open space, sunlight and tree canopy protections are ineffective

We endorse Council's findings:

- proposed parks on private and strata-titled land, only two meeting the Government's own 3,000 m² minimum;
- part of Lower Cooper Park turned into a 2-metre-deep detention basin (Council submission, PDF pp. 230–238, 252);
- winter overshadowing of Trumper Park, Cooper Park and the Woollahra Public School playground (PDF pp. 137, 154–161);
- more than 900 trees lost or affected; and
- threatened species, including the Powerful Owl, left unassessed (PDF pp. 124, 273–274).

How much open space the growth would need

Council's Social Infrastructure Needs Study measures need in two ways: a conventional benchmark of 2.83 hectares per 1,000 people, and a "no net loss" benchmark that keeps today's rate of 1.9 hectares per 1,000 people (Cred Consulting, pp. 62–63, 72).

Scenario	Additional people	To keep today's rate (1.9 ha/1,000)	At 2.83 ha/1,000, including today's 14 ha shortfall
10,000 dwellings	20,415	38.8 ha	72 ha
5,000 dwellings	10,208	19.4 ha	43 ha
2,500 dwellings	5,104	9.7 ha	29 ha

Against this, the Rezoning Proposal offers about 2 hectares of genuinely new open space. Keeping today's rate alone would require around 36 hectares for 9,400 dwellings (our calculation from Cred's figures). The same study finds demand for 5 to 11 additional sports fields (p. 75). Council staff accept that the 29-hectare deficit at just 2,500 dwellings should not be read as "suggesting that 29ha of new open

space could realistically be delivered", that land acquisition has not been costed, and that the area is already three sports fields short (Staff memo, Item 16.7, pp. 4–6).

Regional parks cannot make up the shortfall

The Government's Social and Community Infrastructure Assessment counts Centennial Park and Rushcutters Bay Park, a total of 193.4 hectares, in its summary of existing open space, while conceding that Centennial Parklands "is difficult to access" (Social and Community Infrastructure Assessment, pp. 45–46, 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).

Centennial Parklands already receives almost 31 million visits a year (Centennial Parklands, "Centennial Parklands", centennialparklands.com.au). Its sports fields are "some of the most intensively used in Australia", and demand is such that they cannot be given a proper recovery period between seasons (Centennial Parklands, "Sports fields for the community", 7 April 2019).

Moore Park, meanwhile, is being reshaped for other growth areas. Up to 20 hectares of Moore Park Golf Course is to become public parkland because, in the Planning Minister's words, "the communities of Redfern, Waterloo, Green Square and Zetland are crying out for more green space", with 80,000 residents expected to live within two kilometres of Moore Park by 2040 (ArchitectureAU, "Sydney golf course to become public park", 24 October 2023). A rezoning should not rely on parks that are already intensively used and are being planned for other growing communities.

Canopy targets and heat

A lower than recommended tree canopy target has been adopted. The proposal is measured against a 30 per cent canopy target, and falls below even that. The Sydney Plan sets 40 per cent by 2046, and the Government's Greener Neighbourhoods Guide sets a minimum of 40 per cent on residential land (Department of Planning, Industry and Environment, December 2021; Council submission, PDF pp. 264–266).

Rebuilding strips tree canopy. A typical knock-down rebuild removes about 62 per cent of front-yard canopy (Macquarie University, "Death of the front yard", The Lighthouse, 19 March 2026). Towers on amalgamated sites will remove far more.

Canopy keeps the precinct cool. City of Sydney and Western Sydney University mapping found that suburbs near the harbour are up to 15 degrees cooler in extreme heat, with areas near green space cooler at night (City of Sydney, media release, 14 March 2025).

Residents cannot see the impact on their street

Shadow testing is incomplete with no precinct-wide overshadowing assessment. The testing also covers only the redevelopment sites, not neighbouring homes that won't be rezoned (Council submission, p. 52). Streets such as John Street, where 5-storey buildings face intact terraces, and the Ocean Street gateway, where 9–12 storeys sit beside the Queen Street heritage area (Draft Design Guide, p. 91), have no street-level overshadowing analysis.

Our requests:

- **Secure the open space in the planning instrument.** Zone every proposed park RE1 Public Recreation or nominate it for acquisition. At present none of the new open space is zoned or nominated, so its size, location and delivery depend on future negotiations with landowners and developers (Council submission, p. 123).
- **State the need in hectares.** The Government should state how many hectares of open space the predicted level of growth requires, using the Needs Study benchmarks, and how much of that gap the proposal meets. Only genuinely new land should count, not embellishment of existing parks or regional parks outside the precinct.
- **Abandon the Lower Cooper Park detention basin.** Council's engineers advise that it would turn a flood-free recreation area into a high-hazard flood storage area up to 2 metres deep. It would pond several times a year and fill rapidly with little warning, and it may trigger the need for dam safety approval.

  The Double Bay Floodplain Risk Management Study and Plan did not recommend it, and no cost-benefit analysis has been done (Council submission, p. 252). Flood impacts should be resolved within development sites, not by compromising parkland and threatening biodiversity.
- **Protect winter sunlight by statute.** The planning instrument, not the Design Guide, should require no additional overshadowing of school playgrounds and public parks between 10am and 2pm at the winter solstice. It should cover every new park, as well as Trumper Park, Cooper Park and the Woollahra Public School playground, which the exhibited plans would overshadow in winter (Council submission, pp. 137, 154–161).
- **Publish street-level shadow diagrams.** Diagrams should be labelled with street names and show existing homes, parks and schools, not just the new buildings. They should be hourly at the winter solstice and the equinoxes, and should include sensitive interfaces such as John Street and the Ocean Street gateway, so residents can see the effect on their own street.

- **Adopt enforceable canopy and deep-soil controls.** Set a 40 per cent canopy target, consistent with the Sydney Plan and the Greener Neighbourhoods Guide, and write it into the planning instrument with minimum deep-soil areas on every site. Deep soil should be no less than the 30 per cent on tower sites proposed in Council's Alternative Approach (PDF p. 268). Mature trees should be retained, and canopy forecasts should not assume that all new open space will be planted.
- **Allow no encroachment into Trumper Park.** Remove every proposed development encroachment into the park, including any new road or built form, and set a protected buffer around its bushland edges and threatened flora, as Council's biodiversity review recommends (PDF p. 276). The Trumper Park tennis courts, including the two counted as the new "Jersey Road Park", should stay in public recreational use (PDF p. 234).

8. Geotechnical risks, and a flood study that doesn't hold water

We endorse the findings of Council's geotechnical (SMEC) and flood (Living Water) reviews. We add:

- **The geotechnical brief was not met.** Mott MacDonald was asked to assess "stability and buildability considering the rail corridor" (Geotechnical Assessment, p. 3). Its desktop report instead defers everything to future site-specific assessment (pp. 39–40) and itself recommends a precinct-scale hydrogeological study (p. 39).
- **Development near the rail tunnels is uncertain and potentially risky.** Ground anchors may be prohibited in the rail protection reserve (p. 41), and nearby development must avoid any groundwater drawdown (p. 40). Council's geotechnical reviewer, SMEC, adds that the old tunnel linings cannot be assumed to carry new loads (Council submission, p. 248). No one has mapped which sites, or how many dwellings, are affected.

A flood mitigation strategy that doesn't hold water

Our full analysis is set out in Residents First's supplementary submission on proposed flooding and stormwater impacts and the recommended mitigation measures.

In summary:

- **The Proposal has no deliverable flood strategy**. The Government's own Flooding and Stormwater Report (Rhelm, Rev 04, August 2026) shows that the precinct can only take the proposed level of density if large parts of it are retrofitted for substantial new water overflow channels and a large detention basin on public parkland.

Council's specialist engineers, Living Water Engineering, found that the assessment "does not adequately demonstrate" that the density can be accommodated without adverse downstream flooding, costly mitigation, impacts on evacuation routes or development in high-risk areas (Council submission, pp. 73–74; Appendix 12):

- **The drainage network already fails in a 1-in-20-year storm**, inside the precinct and downstream in Paddington, Double Bay and Darling Point (Rhelm, pp. 30–31).

  Council has informed the Minister of seven serious floods in Double Bay and Rose Bay since 2015 (General Manager's letter to the Minister for Planning, 17 September 2025).

- **The proposed upgrades stop at the precinct boundary**, and the downstream works they depend on are not identified or costed (p. 37).
- **Rhelm calls some upgrades "essential", yet the Infrastructure Delivery Plan leaves all $89.4 million of flood works to Council, 10 or more years after development starts** (IDP, p. 47).
- **Flood levels still rise downstream in every modelled event**, including in Double Bay, even with all mitigation works in place (Appendix 12; Rhelm, pp. 52–53).
- **The flood modelling ignores development around the precinct**. The Government's own documents acknowledge major growth nearby, including about 3,000 additional dwellings planned in Bondi Junction immediately to the south, the Council's Edgecliff Commercial Centre and Double Bay rezoning proposals, and continuing Low and Mid-Rise development (EIE, pp. 6, 24–25). Rhelm lists 13 nearby planning proposals and Housing Delivery Authority projects but models none of them (pp. 16–17).
- **The Lough Playing Fields already intercepts "almost all overland flows from the top of the catchment in Bondi Junction"** (p. 46). This is the same Lough Playing Fields, Cooper Park and Double Bay Creek system that the precinct's flood strategy depends on, and where flood levels are already shown to rise.
- **The retrofit depends on access to private land and public parkland.** It requires the implementation of nine separate flood corridors collectively across about a hectare of private land, secured only by easements as sites redevelop, with no funds allocated for the acquisition of private land (pp. 39–46).
- **It also requires a 2-metre-deep flood basin in Lower Cooper Park, which Council's engineers reject as a high-hazard**, **fast-filling structure** that may need dam safety approval (Appendix 12).

- **Core safety tests have not been done**, including an evacuation assessment to justify shelter in place for up to 9,400 additional dwellings.
- **The Rhelm Report was not tested against the Ministerial Direction on flooding now in force**. This direction bars development in floodways and proposals likely to significantly increase government spending on flood mitigation.
- **Council's engineers identify 400 Glenmore Road as a floodway and a H5 high hazard. Yet it is upzoned in the Rezoning Proposal from R3 Medium Density to R4 High Density (Appendix 12, PDF p. 251).** H5 is the second-highest hazard category: floodwater is unsafe for both people and vehicles, and buildings need special engineering to withstand it. The Government's Flooding Direction bars development in floodways and residential accommodation in high-hazard areas.
- **Flood safety margins are reduced without Council's approval.** Rhelm lowers the minimum height of floors above the 1-in-100-year flood level from the 0.5 m Council requires to 0.3 m.

  The Draft Design Guide then drops the higher 0.7 m margin Rhelm recommended for the flood-prone Manning Road frontage. Council's engineers advise that any reduction must go through Council's own floodplain risk management process (Appendix 12).

  The Draft Design Guide contradicts itself. It promises to "limit redevelopment in low-lying or flood-affected areas" (p. 11). Yet the proposal upzones a floodway site and relies on nine new overland flood corridors running through development sites to mitigate flood risk (pp. 20–21).

- **The proposed towers on Manning Road facing the Lough Playing Fields have no safe, workable evacuation access**. Manning Road, which is beside the Lough Playing Fields, is flood-prone. To keep residents and cars out of floodwater, the Draft Design Guide requires vehicle and pedestrian access to these towers from Wallaroy Road, at the top of the hill (p. 70). Two pages later, it puts the residential entries and townhouse front doors on Manning Road (pp. 71–72).

  Manning Road is where the buses, the playing fields and the most convenient walk to Double Bay are located, so residents will use those Manning Road doors and walk straight into the flood-prone area. Meanwhile, all basement, delivery and service traffic for these towers would be pushed onto Wallaroy Road, which is itself flood-affected and has had no traffic assessment.

- **Coastal hazards are unassessed because the Government has never published coastal vulnerability mapping for the area, a gap the NSW Auditor-General criticised in 2025** (Audit Office of NSW, Coastal

management, performance audit report, 10 September 2025, Key findings and Recommendation 5).

We request that:

1. **Nothing is finalised until a revised flood assessment shows compliance.** The new assessment should meet the Ministerial flooding Direction (P5.7, in force since 1 July 2026). It should be measured against Council's adopted flood studies and include a precinct-scale evacuation assessment prepared with the NSW SES.
2. **The State funds and delivers the drainage works before any uplift takes effect.** This covers the essential drainage works and the downstream works outside the precinct they depend on.
3. **No land in a recognised floodway is upzoned**, starting with 400 Glenmore Road.
4. **The flood corridors are secured as public land**, not piecemeal easements.
5. **The Lower Cooper Park basin is abandoned.**
6. **Council's flood controls are retained.** These include its 0.5 m freeboard, and a precinct-wide on-site detention control should be adopted.
7. **Cumulative development and coastal hazards are modelled before finalisation**. This includes Bondi Junction, which drains to the Lough Playing Fields area.
8. **A precinct-scale hydrogeological and geotechnical investigation is completed**. It should map sites in the rail protection reserve and identify settlement risk to heritage buildings.

Full details and citations are set out in our supplementary submission on flooding and stormwater.

9. Affordable housing is eroded

The proposal is likely to leave the precinct with less affordable housing than it has today.

Who lives here

- **Renters are the largest group:** 35.8 per cent of households at the 2021 Census, compared with 34.2 per cent who owned outright (.id, Woollahra community profile, "Housing tenure").
- **Council's Local Housing Strategy, endorsed by the Department of Planning, found nearly all low-income households in rental stress,** only 140 social and affordable dwellings against a shortfall of at least 1,900, and identified teachers as the largest group of key workers living in the LGA (pp. 30, 33–36).

- These residents are the most exposed to the loss of older, smaller apartments.

Existing affordable homes would be lost

Close to 500 smaller, older apartments sit on redevelopment sites, and most fall outside the Housing SEPP's protections because they are strata-titled (Council submission, PDF pp. 192–193). One State Significant Development at 8-10 New McLean Street would demolish 106 small units and provide only 2 affordable dwellings (PDF p. 194).

The replacement numbers are inflated

Gross, not net. The Affordable Housing Strategy claims that up to 432 affordable dwellings could be accommodated, but the calculation is based on 12,262 gross dwellings rather than 9,400 net (Atlas Economics, Affordable Housing Strategy, pp. 38–39). The difference, about 2,860, matches the existing homes on change sites (Council submission, PDF p. 130). Contributions are counted on rebuilding homes that already exist, while the real affordable housing lost is never assessed.

144 homes, not 432, is the take-up the Strategy itself expects (Council submission, PDF p. 193).

From a 10 per cent affordable housing contribution to 3 per cent. When the rezoning was announced in August 2025, the affordable housing contribution rate was announced to be up to 10 per cent of the uplift (Council submission, p. 13). The exhibited base rate is now only 3 per cent.

The Government's own consultant says rates should be higher

Atlas Urban Economics, the author of the Rezoning Proposal's Affordable Housing Strategy, reviewed the City of Sydney Council's affordable housing contribution rates in October 2024. It recommended a 20 per cent contribution on rezoned land (Atlas Urban Economics, Review of Affordable Housing Contribution Rates, October 2024). For Woollahra, the most financially feasible suburb in Sydney for new apartments, it recommends 3 per cent. Searle describes the 2–3 per cent requirements for the TOD precincts as "tokenistic at best" (Searle 2026, p. 226). The Government should explain why 10 per cent is no longer viable.

Cash contributions will not build homes here

The Strategy prefers cash paid to Homes NSW, which may be spent in "adjoining areas" outside Woollahra (pp. 23, 40–41).

The experience of neighbouring councils shows why cash fails in high-value areas:

- The City of Sydney Council has collected about $495 million in affordable housing contributions since 1996, supporting around 1,525 affordable

dwellings built or planned. Given the choice, developers have overwhelmingly paid cash rather than build (City of Sydney, Equity and Housing Committee report, 11 May 2026). In 2023 Meriton, for example, committed to build an affordable housing building on its Zetland site. But once the City approved the rezoning, it withdrew the offer and opted for a cash contribution of about $29 million instead. The City responded by resolving to seek the power to require on-site delivery (City of Sydney, Resolution of Council, 19 February 2024).

- Waverley's affordable rental supply meets only 57 per cent of demand (Waverley Council, Affordable Housing Contributions Scheme 2023, s. 1.6, pp. 5–6). Buying a six-unit block at 49 Mitchell Street, Bondi Beach, in March 2025 was, in Council's words, "the most significant expansion of its affordable housing portfolio in over a decade" (Waverley Council, "Waverley Council achieves major move forward in affordable housing", media release, 29 March 2025).
- Randwick Council owned 33 affordable housing properties in March 2025 (Randwick City Council, response to supplementary questions, NSW Legislative Council Select Committee on Essential Worker Housing, 7 March 2025), against 1,765 affordable rental dwellings its Housing Strategy says are required by 2036 (Randwick City Council, Housing Strategy, p. 32). In December 2025 it replaced its fixed affordable housing target for new development with "a flexible, feasibility-based approach" (Randwick City Council, "Wrap-up from December 2025 Randwick Council meeting", 10 December 2025).

If affordable housing is not built on the sites that generate the uplift, where else in Woollahra or the surrounding area will it be built?

We support the Government's proposal to switch off the in-fill affordable housing bonus in the precinct. Its homes are affordable for only 15 years and it adds height and bulk on top of the Low and Mid-Rise Housing Policy (Searle 2026, pp. 225–226). It must not be reintroduced.

Our requests: deliver affordable housing on-site and in perpetuity, at rates reflecting the precinct's feasibility; ensure no net loss of existing affordable housing; accept cash only for small residual amounts, ring-fenced to Woollahra; and prepare a social impact assessment covering displacement, community change and two decades of construction.

10. Cumulative impact beyond the precinct not considered

The proposal is assessed as if it were the only change in the eastern suburbs. Council identifies capacity for more than 6,000 dwellings through other pathways in

Double Bay, Rose Bay and Bondi Junction (Council submission, p. 22), and SCT assumed 6,900 dwellings of growth outside the precinct (Scenario 3 review, slide 4). That is a second precinct's worth of growth on the same roads, drains and schools. Council staff confirm that even Council's own Social Infrastructure Needs Study does not account for these other pathways (Staff memo, Item 16.7, p. 4).

Of the Government's documents, the Rhelm Flood and Stormwater Report gives the fullest list of development already in the pipeline, although the EIE and the Economic Impact Assessment mention some of it. Even Rhelm's list only scratches the surface, as significant SSDAs and DAs in the surrounding areas of Double Bay, Darling Point, Paddington and Bellevue Hill are not included. From Rhelm's lists (pp. 16–17):

> *"There are numerous planning proposals that were current or in draft at the time of preparation of this memo, and a number with Housing Delivery Authority (HDA) declarations, including:"*
>
> *• 203-233 New South Head Road, Edgecliff (Edgecliff Centre) (PP-2024-540) (HDA declared)*
>
> *• Edgecliff Commercial Centre (PP-2025-375)*
>
> *• Heritage Listing of Eight Sites and One HCA in the Area of the ECC Strategy boundary (PP-2024-1101)*
>
> *• Double Bay Centre (PP-2025-823)*
>
> *• 136-148 New South Head Road, Edgecliff (PP-2022-1646)*
>
> *• Net Dwelling Loss (PP-2025-604)*
>
> *• Housekeeping FSR (PP-2025-1038)*
>
> *• Contemporary Buildings Heritage Listings (PP-2025-1581)*
>
> *• 8-10 New Mclean Street, Edgecliff (approved)*
>
> *• 135-153 and 155 New South Head Road, Edgecliff (HDA)*
>
> *• 45, 47-49, 53-57 Oxford Street, 7, 9 Denison Street and 2 Mill Hill Road, Bondi Junction (HDA)*
>
> *• 410-414, 416-418, 420, 422, 424, 426, 428-432, 147, 149, 153, 155, 157, 167, 169, 171, 175, 183 Oxford Street, Bondi Junction (HDA)*
>
> *• 110-122 Ebley Street and 17 Hollywood Avenue, Bondi Junction (HDA).*

The Government does not apply its own guidelines on cumulative impacts

The Department's Cumulative Impact Assessment Guidelines for State Significant Projects (March 2026) state that cumulative impacts at broader scales are best

assessed at the strategic level, through precinct plans and local environmental plans (s. 2.3, p. 13; Appendix A, p. 26). This rezoning *is* a strategic instrument.

A double standard. Each State Significant project must be assessed together with "any major greenfield and urban renewal developments that are scheduled for the area" (s. 3.4, p. 17). But the Rezoning Proposal fails to consider the 6,000 or more dwellings already enabled around it.

No reliable baseline for cumulative impacts on traffic and flooding. Proponents cannot complete the cumulative impacts assessment required of them when the Government's baseline consists of:

- a desktop geotechnical review,
- Google Maps traffic data, and
- flood modelling showing adverse impacts that the proposed mitigation does not resolve.

Two competing schemes for development inside the Edgecliff-Woollahra precinct, with no recognition of their combined cumulative impact

The Low and Mid-Rise Housing Policy would continue to apply to "non-change sites", about 75 per cent of the precinct (Council submission, PDF p. 130; Explanation of Intended Effect, p. 25). A master plan cannot manage growth if most of its area can be developed outside it.

For the Ku-ring-gai LGA, the Department excluded the mapped Low and Mid-Rise areas from the TOD precincts to avoid this exact scenario (Ku-ring-gai Council, "Transport Oriented Development (TOD)"). The same standard should apply here.

Rose Bay and Double Bay are already under pressure and have both experienced damage from excavation

The Low and Mid-Rise (LMR) Housing Policy alone has enabled around 4,960 additional dwellings in the Double Bay–Edgecliff area and 2,470 in Rose Bay (Council memo, p. 3).

In fact, Rose Bay and Double Bay are already proving to be cautionary examples of the dangers of implementing the LMR Housing Policy before cumulative impact studies are completed.

The LMR Housing Policy, coupled with the take up of the popular Affordable Housing Bonus (AHB) has led to a tsunami of development applications (DAs) in both Rose Bay and Double Bay. Applications already lodged around the Rose Bay Centre, for example, could deliver well over 1,000 dwellings, with around 23 State Significant DAs and DAs in Rose Bay approved or in the pipeline.

In response to evidence of damage from excavation to surrounding properties, Woollahra Council commissioned studies from GHD (Rose Bay - Hydrogeological and Geotechnical Impacts Study 2024 and Double Bay - Hydrogeological Geotechnical Impacts Groundwater and Geotechnical Assessment Report 2020). These reports led to a tightening of its dewatering and excavation controls, but developments are now being approved before an assessment of the cumulative impact on groundwater flows and settlement of multiple basement constructions (as called for in the GHD reports) has been completed. Consequently, existing residents live in fear that potentially catastrophic damage will occur when construction of multiple deep basement excavations begins.

Rose Bay is also severely constrained in terms of its road network, depending on New South Head Road as the main arterial road, already heavily congested between Double Bay and Edgecliff during peak times.

Savills warns that releasing too much capacity at once "can place downward pressure on sales values and adversely affect project feasibility" (Council memo, p. 13). Rose Bay, Double Bay, Edgecliff and Woollahra are all competing for the same narrow, high-end market.

Our requests:

- complete a cumulative impact assessment covering every growth pathway in and around the precinct, including Waverley and the City of Sydney LGAs;
- require a joint cumulative assessment for State Significant Developments in the precinct and the Rose Bay and Double Bay LMR designated town centres; and
- switch off the Low and Mid-Rise Housing Policy in the Edgecliff-Woollahra Precinct and in areas with documented constraints such as Rose Bay and Double Bay.

11. Council's Alternative Approach: a better starting point, with conditions

Woollahra Council has proposed an Alternative Approach as the basis for the first stage of any rezoning (Council submission, pp. 10, 97). Residents First considers it a far better starting point, provided it is supported by the delivery of the proposed Woollahra Station and the required significant infrastructure spending, which depends on binding commitments from developers.

Its strengths

- **A design-led approach** informed by existing heritage, canopy and topography rather than a target (Council submission, p. 17).

- **A more realistic net increase of about 2,200 to 3,600 dwellings** (Council memo, p. 1), with floor space ratios Savills found feasible on about 90 per cent of sites (Council submission, p. 25).
- **Less heritage and tree loss,** with 30 per cent deep soil on tower sites (p. 58; PDF p. 268).
- **A staged, "deferred rezoning" model similar to Green Square**. Note: Savills warns that stages and triggers must be announced from the outset: if they are not, the share of feasible sites falls from 90 per cent to 40 per cent after three to five years (Council memo, p. 13).
- **A precedent for its consideration:** on 14 November 2025 the Government adopted Ku-ring-gai Council's alternative to the TOD controls. Whilst that alternative delivered at least equivalent capacity, Ku-ring-gai's centres also started at 2,100–2,600 people per square kilometre, against about 5,800 in Woollahra and 7,800 in Edgecliff (ABS 2021 Census; Council report, p. 7).

Its limitations

- **The yield is a range, but the submission presents only the top of it.** The memo gives 2,200–3,600 dwellings (p. 1); the submission refers only to 3,600 (pp. 9, 17, 98).
- **Heritage loss remains significant.** For about 25 contributory properties, staff say it "makes more sense to start from the assumption they would be demolished", and about 34 more would be retained only as their principal building form, which staff acknowledge would still have negative impacts (Council memo, pp. 4–5). Staff concede that the negative impact on the Woollahra Heritage Conservation Area is "unavoidable if seeking to permit a substantial increase in density" (Staff memo, Item 16.7, p. 8; see section 6).
- **The roads are still over capacity at 3,600 additional dwellings.** Staff advised that the network's ultimate capacity is about 5,000 dwellings and that capacity is exceeded at 3,600 without road upgrades (Council memo, p. 7).

  For the Alternative Approach, SCT Consulting recommended several network modifications to improve traffic flow and efficiency through the precinct, including:

- delivery of Woollahra Station to support a significant shift towards public transport and reduce reliance on private vehicles;
- targeted upgrades to key intersections and signal operations to improve network efficiency and manage additional traffic demand;
- improved walking and cycling connections throughout the precinct, particularly links to centres, public transport hubs and local destinations;

- enhanced north-south bus connections to improve access to Woollahra Station and strengthen integration between rail and bus services;
- end-of-trip facilities, bicycle parking and supporting infrastructure to encourage active transport; and
- reduced residential parking rates for future residents to reduce private vehicle reliance (p. 27).

  But none of these enhancements are likely to reduce traffic congestion issues to acceptable levels, especially since the Alternative Approach acknowledges that "access to public transport options can be limited as the railway line exists along the cliff edge of the Woollahra plateau, reducing convenient access for many residents located further east" (p. 1). Further, retrofitting the narrow streets and hilly terrain of Edgecliff-Woollahra Precinct for bicycle lanes is already proving difficult.
- **The Alternative Approach infrastructure and facilities are uncosted**, and a high-level estimate by TCubed Consulting has not been published (Staff memo, Item 16.7, pp. 6–7).
- **Its open space falls short and depends on private developer commitment and coordination.** It proposes about 2 hectares of new open space, where 8.5–14 hectares would be needed to keep today's rates, with new open space only achieved from allocation in privately held proposed podiums incorporated into redevelopments and the gardens of heritage-listed estates.
- **It has not been exhibited or fully tested**, includes towers of up to 20 storeys on the Woollahra Station block, and residents have raised concerns about ridgeline massing at the Trumper Park interface.

Our conditions for supporting the Alternative Approach

Residents First would support the Alternative Approach as the basis for a first stage only if:

- **Woollahra Station is legally committed** before any station-dependent capacity is switched on;
- **stage one has its own triggers**, tied to delivery of the infrastructure it relies on;
- **its infrastructure is costed and funded**, including the road upgrades SCT identifies;
- **open space and community facilities are secured** by binding planning agreements;
- **affordable housing is delivered on-site**, with no net loss of existing naturally occurring affordable homes;

- **the yield is stated honestly as a range** with the true loss to the area's heritage fabric acknowledged; and
- **the full Alternative Approach is published for community consultatio**n before it is adopted.

12. A process that has not allowed informed participation

- The exhibition was originally only 28 days, not the 42-day minimum for urban renewal master plans (Council submission, p. 31).
- The station is being progressed separately by Transport for NSW, so residents cannot weigh its costs and benefits alongside the rezoning (p. 90).
- Residents were asked to comment on concepts, not draft planning provisions (p. 77).
- Advice from Council, the State Design Review Panel and the Department's own consultants was repeatedly not reflected in the master plan (pp. 15–16).
- Drop-in sessions were held only in Double Bay, and the Planning Portal's 10 MB file limit may exclude detailed submissions (pp. 90–93).

13. Conclusion

The exhibited Rezoning Proposal should not proceed. It creates far more capacity than the market can absorb or the infrastructure can support, and asks residents to accept the loss of heritage, canopy, sunlight and existing affordable homes in exchange for benefits that are uncosted and uncertain.

The catalyst for the Rezoning, the proposed Woollahra Station, has no published cost or business case, and the levy that's meant to help fund it would raise a fraction of its reported minimum cost.

The Government's own experts have flagged these exact risks: its heritage consultant warned about the loss of contributory buildings, its geotechnical specialist highlighted groundwater and rail tunnel hazards, its flood modelling revealed adverse downstream impacts that its proposed mitigation does not resolve, and its affordable housing consultant recommended much higher contribution rates for high-value areas in a neighbouring council area. Yet, the Rezoning Proposal dismisses these expert findings while adopting the long-standing demands of the property development industry.

Residents First supports appropriately planned new housing that is staged, tied to a committed station and fully funded infrastructure, protective of local heritage and tree canopy, and delivers genuine, permanent affordable homes within the precinct.

Council's Alternative Approach, subject to the conditions outlined in section 11, provides a reasonable foundation to begin that work.

We ask the Minister and the Department to withdraw the exhibited proposal, act on the requests in this submission, and re-exhibit a revised proposal, with the Woollahra Station business case, the funding model and draft planning provisions, for at least 42 days.

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