

Planning Proposal



Edgecliff Commercial Centre Planning Controls



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Acknowledgement of Country

Woollahra Council acknowledges that we are on the land of the Gadigal and Birrabirragal people, the Traditional Custodians of the land. We pay our respects to Elders past, present and emerging.

1. Introduction

This planning proposal seeks amendments to the *Woollahra Local Environmental Plan 2014* (Woollahra LEP 2014) to implement the vision and built form framework of the *Edgecliff Commercial Centre Planning and Urban Design Strategy* (ECC Strategy).

It aims to facilitate development in the Edgecliff Commercial Centre (ECC) that occurs in a planned and coordinated manner. It would achieve this by creating opportunities for renewal, while also protecting the environmental amenity of the ECC and surrounding residential land.

Specifically, the planning proposal seeks to establish alternative building heights and floor space ratios (FSRs) for select properties within the ECC, as well as new local provisions to encourage high quality outcomes across the centre. It also proposes an affordable housing contributions scheme (AHCS), which would capture affordable housing contributions from the uplift envisaged.

Council staff are separately preparing a draft development control plan (DCP) to amend *Chapter D4 Edgecliff Centre* of the *Woollahra Development Control Plan 2015* (Woollahra DCP 2015). This will include complementary controls on built form outcomes and public domain treatments.

This planning proposal has been prepared in accordance with section 3.33 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and the *Local Environmental Plan Making Guideline*.

This planning proposal applies to the ECC, which is shown in **Figure 1** below.

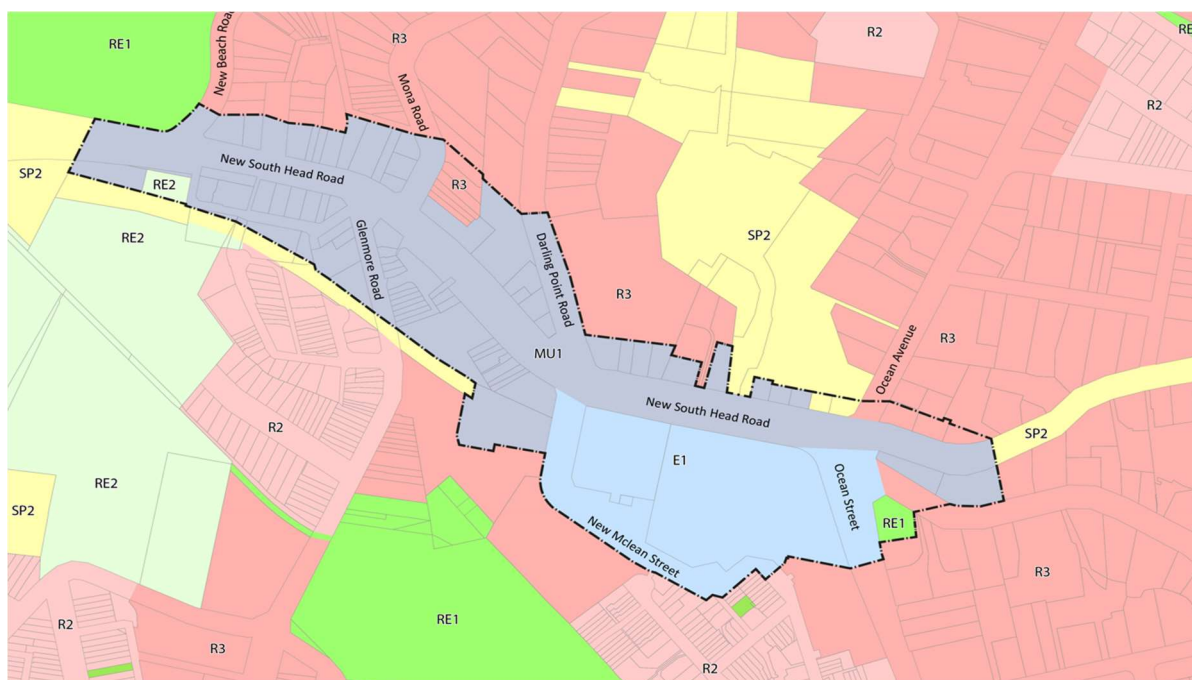


Figure 1: Map showing area subject to planning proposal (dotted line).

This document is principally guided by the adopted ECC Strategy and the *Edgecliff Commercial Centre: Heritage Assessment Report* by GML Heritage (Edgecliff Heritage Study). Relevant information regarding both these documents is outlined below.

1.1. Edgecliff Commercial Centre Planning and Urban Design Strategy

The ECC has been the subject of a number of proponent-led planning proposals, which are seeking uplift beyond that of the current planning controls. This has resulted in uncoordinated built form outcomes, which do not centre growth in the most appropriate areas.

Council has undertaken a strategic review of the planning controls for the ECC in order to provide a clear and coordinated approach to planning that will prevent ad-hoc development. Furthermore, Council has identified the ECC as a suitable area to facilitate controlled uplift to help meet our housing target of 1900 dwellings between 2024-2029.

The planning proposal is the outcome of the comprehensive strategic planning process that resulted in the adopted ECC Strategy, which seeks to deliver this controlled growth. After being publicly exhibited and refined in response to the feedback provided, the ECC Strategy was endorsed by Council on 29 April 2024 as follows:

THAT Council:

- A. Receives and notes the submissions received in response to the Draft Edgecliff Commercial Centre Planning and Urban Design Strategy.*
- B. Receives and notes the post exhibition report on the Draft Edgecliff Commercial Centre Planning and Urban Design Strategy and supporting documents.*
- C. Endorses the updated Edgecliff Commercial Centre Planning and Urban Design Strategy as provided at Attachment 1 of the report to the Strategic and Corporate Committee meeting of 24 April 2024, and requests staff to prepare a planning proposal to enact the updated Edgecliff Commercial Centre Planning and Urban Design Strategy and report the planning proposal to a future meeting of the Woollahra Local Planning Panel for advice subject to the following:*
 - i. Amend Figure 26 on Page 29 to show a separated cycleway in front of the Edgecliff Centre Site and the Edgecliff Station.*
 - ii. Amend Figure 19 on Page 22 to remove western crossing across New South Head Road and show existing crossings only.*
 - iii. Make no changes to the current controls or zone to the site at 81-83 New South Head Road Edgecliff.*
- D. Requests staff to prepare an Affordable Housing Contributions Scheme to enable affordable housing contributions to be required in conjunction with uplift, which is progressed concurrently with the planning proposal.*
- E. Requests staff to prepare a draft development control plan for the Edgecliff Commercial Centre to complement the provisions in the planning proposal.*
- F. Endorses the updated Edgecliff Commercial Centre Public Domain Plan provided at Attachment 2 of the report to the Strategic and Corporate Committee meeting of 24 April 2024 subject to the following:*
 - i. Amend Figure 8 on Page 15 to add pedestrians in the footway section to clarify it is a shared pedestrian and cycleway.*
 - ii. Amend Figure 29 on Page 32 to show a separated cycleway in front of the Edgecliff Centre Site and the Edgecliff Station.*
 - iii. Amend Figure 30 on Page 33 to add a cycleway line around into Ocean Street.*

- G. Requests staff to identify how the public domain improvements will be funded including reviewing opportunities to use Section 7.11, Section 7.12 and Voluntary Planning agreements.

The ECC Strategy was accompanied by the *Edgecliff Commercial Centre Public Domain Plan* (Public Domain Plan) and the *Edgecliff Commercial Centre Transport Study* (Transport Study) prepared by SCT Consulting in April 2024. These documents may be viewed here: <https://yoursay.woollahra.nsw.gov.au/edgecliff>.

The ECC Strategy has been updated by Council staff, reflective of the changes in the resolution, and is now an endorsed document. This planning proposal and the accompanying AHCS action Parts C and D of the above resolution.

In accordance with the ECC Strategy, the planning proposal seeks to enact the following:

- Alternative building height and FSR controls on certain sites, where site amalgamation requirements are met, and sites are not subject to any additional bonuses;
- An AHCS applying to the uplift sites.
- A range for non-residential FSRs; and
- Controls for active frontages, dwelling mix and the public domain.

The remaining matters identified in the ECC Strategy will be addressed in the draft DCP, including but not limited to, character statements, street wall heights, setbacks, awnings, overshadowing, public domain upgrades and open space provision.

An excerpt of the ECC Strategy's recommended built form outcome is provided in **Figure 2** below.

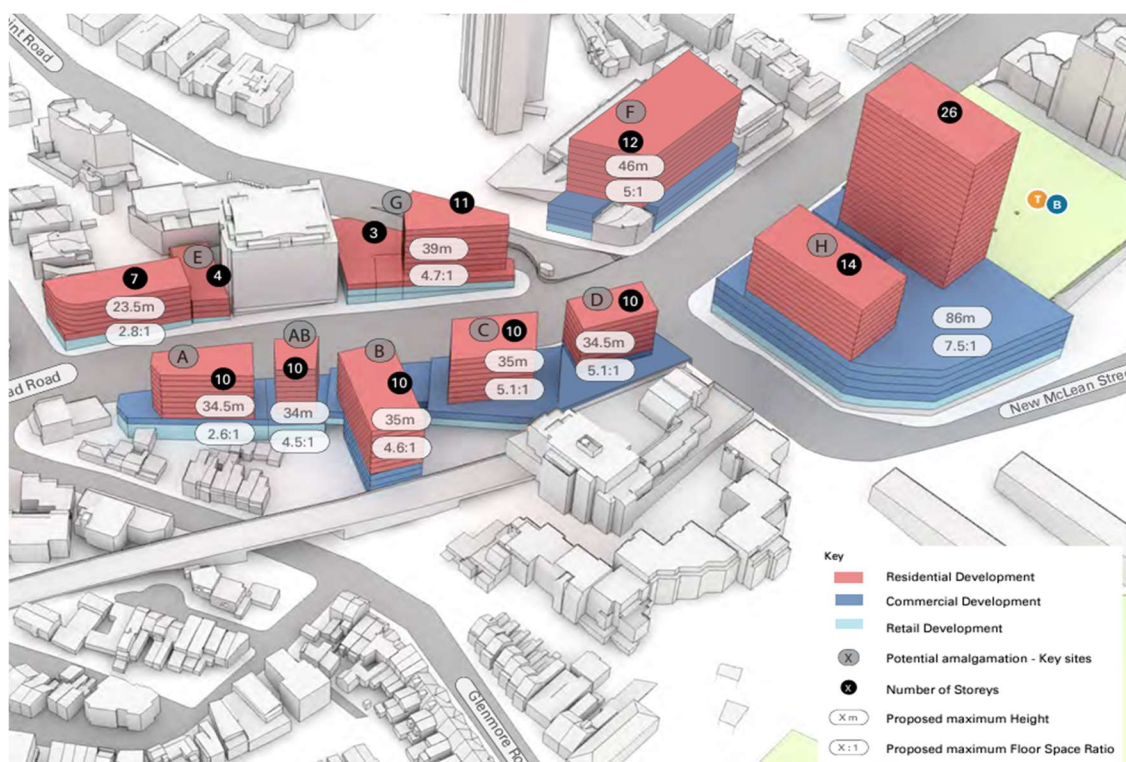


Figure 2: Built form outcome from endorsed ECC Strategy.

1.2. Edgecliff Heritage Study

In 2022, Council engaged GML Heritage to undertake a study of the ECC.

The Edgecliff Heritage Study originally recommended that Council prepare a planning proposal to list six local items and one heritage conservation area (HCA). The report was presented to the Woollahra Local Planning Panel (LPP) in October 2023 and following their feedback, the report was revised to include an additional two buildings recommended for heritage listing. After being supported by Council, the planning proposal was lodged for Gateway in June 2024. No Gateway determination has been issued as of 6 February 2025.

The final list of eight items and one HCA being recommended for heritage listing is presented below in **Table 1**. These recommended listings have been considered in the preparation of this planning proposal.

Table 1: Properties for proposed heritage listing in the Centre.

Item Name	Address	Lot
‘Gruzman House’, including interiors	6–8 Oswald Street, Darling Point	Lot 12, DP 3893 and Lot 3, DP 1197166
‘Winston House’, including interiors	20 New South Head Road, Edgecliff	SP 20728 SP 31826
‘Portland Hall’, including interiors and gardens	48 New South Head Road, Edgecliff	Lot 1, DP 82089 Lot 1, DP 1107185 Lot 1, DP 921798
‘Cobham’, including interiors and gardens	166 New South Head Road, Edgecliff	SP 90371
‘Brantwood Court’ including interiors and gardens	168 New South Head Road, Edgecliff	SP 11580
‘Brantwood Hall’ including interiors and gardens	170 New South Head Road, Edgecliff	SP 86720
Victorian Georgian terrace group – three cottages	543–547 Glenmore Road, Edgecliff	Lots 34, 35 and 36, DP 255233
Phoenix Palms at Oswald Street Reserve, Darling Point	Oswald Street, Darling Point	Road reserve
Brantwood Heritage Conservation Area	164 New South Head Rd	SP 16897
	166 New South Head Rd	SP 90371
	168 New South Head Rd	SP 11580
	170 New South Head Rd	SP 86720
	172-180 New South Head Rd	SP 10535

1.3. Edgecliff Centre site planning proposal

We note that the site at 203-233 New South Head Road (Area H in the ECC Strategy) is subject to a separate proponent-led planning proposal that seeks greater uplift than that envisaged in the ECC Strategy. Should this planning proposal be finalised, staff will remove this site from this planning proposal. As at 6 February 2025, it is at the pre-Gateway stage.

1.4. Local Planning Panel advice

This planning proposal was referred to the Woollahra LPP on 19 December 2024. The panel were supportive of the proposed amendments and recommended that Council proceed. The Woollahra LPP's advice is provided below.

Part A. THAT the Woollahra Local Planning Panel advises Council that it supports the planning proposal (as provided at Attachment 1 of the Panel Agenda), as it demonstrates site-specific and strategic merit for following reasons:

- i. The planning proposal is consistent with the relevant objectives of the Greater Sydney Region Plan: A Metropolis of Three Cities and the relevant planning priorities and actions of the Eastern City District Plan.*
- ii. The planning proposal aligns with the Woollahra Local Strategic Planning Statement, Woollahra Local Housing Strategy and Council's Community Strategic Plan Woollahra 2032.*
- iii. The planning proposal is supported by a detailed transport study undertaken by SCT Consulting, to analyse the existing and the future transport capacity within the ECC.*

Part B. The Woollahra Local Planning Panel advises Council that it supports the planning proposal (as provided at Attachment 1) to amend the Woollahra Local Environmental Plan 2014 which seeks to achieve the following:

- i. Provide increased building heights and floor space ratios for areas identified on the Key Sites Map, subject to amalgamation requirements being met.*
- ii. Restrict bonuses from other environmental planning instruments applying where the increased building heights and floor space ratios are taken up.*
- iii. Specify minimum and maximum non-residential floor space ratios for the areas identified on the Key Sites Map.*
- iv. Insert local provisions for all development in the Edgecliff Commercial Centre, addressing dwelling mix, active frontages and the public domain.*
- v. Insert a clause that requires affordable housing contributions for areas identified on the Key Sites Map, consistent with the Woollahra Affordable Housing Contributions Scheme at Attachment 2.*

Part C. The Woollahra Local Planning Panel advises Council to ensure there are local provisions to facilitate design excellence in the Edgecliff Commercial Centre.

Part D. The Woollahra Local Planning Panel notes that the Edgecliff Commercial Centre Local Heritage Listing planning proposal to implement the Edgecliff Heritage Study has been lodged with the Department of Planning, Housing and Infrastructure for Gateway determination and this planning proposal should be considered separately.

Part E. The Woollahra Local Planning Panel notes the many public submissions made to the meeting of 19 December 2024 made comments on the three proponent-initiated planning proposals that are beyond the remit of this local planning panel and are being administered by the Sydney Eastern City Planning Panel.

Part F. The Woollahra Local Planning Panel encourages staff to monitor the evolving outcomes from various planning proposals in Edgecliff and state-led planning reforms for their implications in relation to this planning proposal.

In relation to Part C, Council agree that design excellence provisions are essential to ensuring high quality architectural outcomes in the ECC. Staff are separately preparing a planning proposal to establish design excellence provisions that capture development across the whole Woollahra LGA. This will help ensure the achievement of high quality architectural outcomes irrespective of whether development is in a key centre, and will avoid the duplication of controls for different areas (such as in a future planning proposal for the Double Bay Centre).

Parts D, E and F are noted by Council staff. We will ensure that the evolving outcomes of other planning proposals in Edgecliff, as well as the NSW Government reforms, are closely monitored and appropriately acted on where necessary.

2. Existing context

2.1. Subject area

The ECC runs along both sides of New South Head Road, from its intersection with New Beach Road in the west to its intersection with Ocean Avenue in the east.

The ECC contains a mix of dwellings, shops, offices, and other services. A commercial hub at Edgecliff Station includes Eastpoint Food Fair (235-285 New South Head Road, above the station) and the Edgecliff Centre (203-233 New South Head Road, adjacent to the station). Each has a supermarket, specialty shops, cafes, parking, and pedestrian access through to Edgecliff Station and bus interchange.

There are nearby public open spaces including Rushcutters Bay Park, Trumper Park and Trumper Oval providing a range of recreational facilities.

Several schools are located within walking distance of the ECC. These include the private schools (primary and secondary) of Ascham, Sydney Grammar and Edgecliff Preparatory School, and Double Bay Public School.

The ECC has access to other nearby precincts that offer shopping and entertainment, including Bondi Junction, Kings Cross, Oxford Street and Darlinghurst, Double Bay and Surry Hills.

2.2. Building types and uses

The eclectic style and character of the built form in the ECC reflects the varied land uses present. Building age varies, generally from the early to late twentieth century. Building height ranges from one to 16 storeys. The three to four storey-built forms along New South Head Road are punctuated by several taller buildings that are generally of later construction.

The suburb of Edgecliff has a high percentage of apartments in medium and high-rise buildings – 70% of dwelling stock (ABS, 2021). Consequently, a significant number of properties within and surrounding the ECC have been strata subdivided.

Some of these older apartment buildings contain smaller units, have no parking or on-site facilities and are a type of housing that is unlikely to be facilitated in today's market. These buildings make an important contribution to housing diversity in the ECC.

2.3. Existing movement network and accessibility

The ECC is primarily accessed from New South Head Road. It is serviced by frequent public transport services including bus routes and trains at Edgecliff Station, being on the Eastern

Suburbs line. These transport services provide access to surrounding centres such as the Sydney CBD, Kings Cross and Bondi Junction. The ECC also has pedestrian links to Paddington and the Sydney CBD, providing opportunities for active transportation.

Within the ECC, there are moderate traffic volumes outside peak periods, with all intersections providing acceptable levels of service. However, on New South Head Road, worsened congestion and high traffic volumes have been identified during the morning and evening peak periods.

3. Existing planning controls

The existing planning controls applying to the ECC are summarised under the headings below.

3.1. Land use zone

The ECC is predominately zoned E1 Local Centre and MU1 Mixed use. In terms of permissible uses, both zones allow for commercial premises, which facilitates the introduction of a wide variety of businesses, including retail outlets, office space and consumer services. They also permit the construction of shop top housing, but not residential flat buildings. This ensures a wide distribution of commercial uses and encourages active site frontages.

3.2. Height of buildings

The maximum building height for the land within the ECC ranges from 5m to 34m. The distribution of the maximum heights generally follows the topography. The largest heights are focused on Edgecliff Station (a high point on the ridgeline) and then transition down the hills towards Rushcutters Bay and Double Bay. Some development around the ECC that has a greater height than is currently permitted, was built before the introduction of the Woollahra LEP 2014.

3.3. Floor space ratio

The maximum FSR for land within the ECC ranges from 0.5:1 to 4:1. Like building heights, the FSRs are highest around Edgecliff Station and follow the topography.

3.4. Heritage

Local heritage items within the ECC (on New South Head Road) include a masonry wall within Darling Point Road, the former bank building at 136, Ascham School at 188, the former Post Office at 287–289 New South Head Road. Rushcutters Bay Park (adjoining the ECC to the north-west) and the Fenton residential building at 8 Albert Street (to the south-east) are listed as state heritage items.

The Paddington HCA and Mona Road HCA adjoin the ECC (both having a small number of properties inside the centre as well), and the Woollahra HCA is to the south-east. Edgecliff Station and the Edgecliff (Rushcutters Bay) Viaduct are heritage items under Section 170 of the *Heritage Act 1977*.

As previously outlined, a current planning proposal also recommends the listing of eight local heritage items and one HCA in the ECC.

4. Objectives of planning proposal

The objectives of this planning proposal are to:

- Grow the ECC by facilitating uplift on appropriate sites, and protect the local character of land surrounding the centre.
- Encourage a mix of uses including retail, employment residential and community space, with non-residential uses on lower levels and residential above, with integrated community infrastructure.
- Accentuate the core, with the tallest buildings on the hill around the Edgecliff Station.
- Protect the environmental amenity of existing development and the public domain.
- Conserve environmental heritage in and around the ECC.
- Protect diverse housing in the ECC and promote the development of new affordable housing.
- Improve the public domain via improvements including new public spaces, urban greening, street furniture and lighting, pedestrian paths, cycleways and public art.
- Mitigate traffic impacts through upgraded infrastructure and the reduction of private vehicle reliance.
- Provide for the implementation of an AHCS to facilitate affordable housing provision in the area.

5. Explanation of provisions

The objectives of this planning proposal will be achieved by amendments to the Woollahra LEP 2014, including:

- Alternative building height and FSR controls on certain sites, where site amalgamation requirements are met, and sites are not subject to any additional bonuses;
- An AHCS applying to the uplift sites;
- A range for non-residential FSRs; and
- Controls for active frontages, dwelling mix and the public domain.

These amendments are consistent with those recommended in the adopted ECC Strategy. This section separately discusses controls concerning built form outcomes and affordable housing contributions under the headings below.

5.1. Basis for built form controls

The ECC Strategy recommends built form outcomes using a precinct-based approach. These precincts are shown in **Figure 3** below.



Figure 3: Precincts identified in the ECC Strategy.

The four precincts, listed in order of the numbers in **Figure 3**, are further described below.

5.1.1. Western Basin

The Western Basin (Precinct 1) is one of the main entrances to the Woollahra LGA and is the western entrance to the ECC. Some of the most diverse housing in the ECC is located in this precinct. It contains a large amount of older apartment stock, with smaller studio and one-bedroom dwellings that are more affordable to rent or buy. If these buildings were redeveloped, local market conditions would likely result in these dwellings being replaced by higher cost housing that does not cater to the same demographics.

It also has Moreton Bay Figs along the side of New South Head Road and in a landscaped median, which are fundamental to the precinct's character. Landscaping frames views into the ECC and building height responds to the height of the trees. The visual and physical relationship across the precinct, between the Paddington slopes and Rushcutters Bay, is retained.

No uplift is recommended for this precinct. This will assist in the retention of smaller, low-cost apartments, while also protecting the visual catchment across the basin and ensuring the LGA's entrance is framed by landscaped features. There are also a number of heritage items being separately proposed in this precinct. Gruzman House, Winston House and the Phoenix Palms previously described make development around Oswald Street unsuitable.

Public domain upgrades will be sought through the accompanying draft DCP. Unit mix controls being proposed will also promote housing diversity throughout the ECC.

5.1.2. Mixed Use Corridor

The Mixed Use Corridor (2) contains a mix of retail, services, and residential uses. Retail activates the New South Head Road frontages and continuous awnings provide pedestrian amenity. Articulated facades and upper storey setbacks reduce the apparent bulk and scale of buildings. Built form in this precinct is varied, contributing to an interesting streetscape, and frames the landmark development on the Edgecliff Centre site.

This planning proposal recommends uplift that would increase dwelling density and retail floor space in this precinct, providing for more housing and local services. However, this has been balanced against a need to respect places of heritage significance and allow an appropriate built form transition from the Local Commercial Core to the lower scale Western Basin. A height range of 7-11 storeys is proposed within this precinct. These heights are based on individual site merit, urban design testing, and context.

5.1.3. Local Commercial Core

The Local Commercial Core (3) serves as a community hub, being a focus for employment, shopping and mass transportation. It sits at the top of the ridgeline, resulting in its economic importance being underscored by its visual prominence.

This planning proposal seeks to further reinforce these characteristics by making provision for the growth of residential and commercial floor space. Subsequent redevelopment would also allow for the upgrading of prominent public spaces, and connections to important transport infrastructure. Importantly, the proposal also endeavours to concentrate bulk in areas that respect New McLean Street as a transition zone to the Paddington HCA and Trumper Park and have regard to the proposed Brantwood HCA.

This proposal will also capitalise on an opportunity to create an urban marker to strengthen the identity of the ECC. It recommends a landmark tower of 26 storeys on the Edgecliff Centre site. This is based on unique feasibility, urban design, environmental considerations and amenity outcomes.

5.1.4. Eastern Edge

The Eastern Edge (4) is the primary connection to the adjoining Double Bay Centre. No uplift is recommended in this area, as relevant sites are either used for education purposes or already developed to an appropriate density. Any further development would compromise the transition of bulk down the hill towards Double Bay. However, similar to the Western Basin, public domain upgrades will be set out in the accompanying draft DCP.

5.2. Details of built form controls

The planning proposal recommends uplift on certain sites at the top of the ridge, closest to the Edgecliff Station. This uplift would be facilitated over seven amalgamated sites. The sites are shown in **Figure 4**.



Figure 4: Seven consolidated subject sites (showing E and F, which have controls already gazetted).

Sites E and F have already been subject to site specific planning proposals initiated by their respective owners, and consequently the controls illustrated in the ECC Strategy are already in force. Site E has an adopted building height and FSR of 23.5m and 2.9:1 respectively. Site F has 46m and 5:1. They have been included in relevant maps and their site identifiers (e.g. Site E) have been retained as is, to maintain alignment with the adopted ECC Strategy. Amalgamation criteria do not apply to either Sites E and F, as this issue was already addressed in their respective planning proposals.

To align with drafting conventions in the Woollahra LEP 2014, we have had to convert the sites to 'areas' for inclusion in the Key Sites Map. These are shown in **Table 2** below.

Table 2: Summary of proposed controls for uplift sites*

ECC Strategy Site Identifier	Address	Key Sites Map Area
A	135-155 New South Head Rd	Area 2
AB	157-159 New South Head Rd	Area 3
B	161 New South Head Rd	Area 4
C	179-191 New South Head Rd	Area 5
D	1 New McLean St	Area 6
G	110-130 New South Head Rd (also partly known as 2A-2B Darling Point Rd)	Area 7
H	203-233 New South Head Rd and road reserve	Area 8

*Note exclusion of Sites E and F as already gazetted. Site E is already Area 1 on the Key Sites Map.

Under this planning proposal, each of the remaining seven sites would receive an alternative maximum building height and FSR if lot amalgamation criteria are met. A non-residential FSR range would also apply. The key envelope controls proposed for each site are summarised in **Table 3** below.

This planning proposal also recommends a provision that prevents any uplift site receiving additional building height or floor space. This would be done by restricting bonuses from any other environmental planning instrument.

Table 3: Summary of proposed controls for uplift sites

Site	Address	Lots	Existing height / storeys	Proposed height / storeys	Existing FSR	Proposed FSR	Proposed non-residential FSR
A	135-155 New South Head Rd	<ul style="list-style-type: none"> Lot 1 in DP 793936 Lot 2 in DP 793936 	14.5m / 4 storeys	34.5m / 10 storeys	1.5:1	2.6:1	0.7:1 -1.2:1
AB	157-159 New South Head Rd	<ul style="list-style-type: none"> Lot 101 in DP 854375 SP 51202 	14.5m / 4 storeys	34m / 10 storeys	1.5:1	4.5:1	2:1 – 2.9:1
B	161 New South Head Rd	N/A, already consolid.	14.5m / 4 storeys	35m / 10 storeys	2:1	4.6:1	1.6:1 – 2.5:1
C	179-191 New South Head Rd	<ul style="list-style-type: none"> Lots 14, 15, 16, 17, 18, 19, 20 in DP 255233 	14.5m / 4 storeys	35m / 10 storeys	2.5:1	5.1:1	2:1 – 3.1

Site	Address	Lots	Existing height / storeys	Proposed height / storeys	Existing FSR	Proposed FSR	Proposed non-residential FSR
D	1 New McLean St	N/A, already consolid.	14.5m / 4 storeys	34.5m / 10 storeys	2.5:1	5.1:1	2.2:1 – 3.2:1
G	110-130 New South Head Rd (also partly known as 2A-2B Darling Point Rd	<ul style="list-style-type: none"> Lot A in DP 176247 Lot C in DP 180913 SP 3819 SP 42657 	20.5m / 6 storeys	39m / 11 storeys	2:1	4.7:1	0.4:1 – 1.4:1
H	203-233 New South Head Rd and road reserve	N/A	6-26m / 7 storeys	86m / 26 storeys	2.5:1	7.5:1	3:1 – 4.5:1

This planning proposal also recommends provisions that would apply to any development for new buildings or significant additions anywhere in the ECC (as shown on a new Locality Identification Map to be inserted into the Woollahra LEP 2014). These address active frontages, the enhancement of the public domain and dwelling size mix.

5.3. Built form controls draft clause

The following text is indicative of what would be included in the Woollahra LEP 2014 as a new local provision. It should be noted that the draft clause is indicative only and would be subject to drafting by the Parliamentary Counsel's Office, should the proposal progress to finalisation.

6.12 Development on land in the Edgecliff Commercial Centre

(1) *The objectives of this clause are as follows—*

- (a) to provide additional building height and floor space to specified land,*
- (b) to encourage the consolidation of lots to promote high quality urban design outcomes and the efficient use of land,*
- (c) to ensure new development responds to the desired future character of the Edgecliff Commercial Centre,*
- (d) to protect the environmental amenity of surrounding land uses and the public domain,*
- (e) to enhance the public domain through improved community infrastructure and frontage activation,*
- (f) to encourage diversity in dwelling sizes.*

(2) *This clause applies to development in the Edgecliff Commercial Centre on the Locality Identification Map, involving-*

- (a) the erection of a new building,*
- (b) significant alterations and additions to an existing building.*

(3) *Despite Part 4, the building height and floor space ratio of development on land on the Key Sites Map to which this clause applies must be no more than -*

- (a) in respect to Area 2 – 34.5m and 2.6:1*
- (b) in respect to Area 3 – 34m and 4.5:1*
- (c) in respect to Area 4 – 35m and 4.6:1*
- (d) in respect to Area 5 – 35m and 5.1:1*
- (e) in respect to Area 6 – 34.5m and 5.1:1*
- (f) in respect to Area 7 – 39m and 4.7:1*
- (g) in respect to Area 8 – 86m and 7.5:1*

(4) *Development subject to subclause (3) that exceeds development standards under Part 4 must have a **non-residential** floor space ratio between-*

- (a) in respect to Area 2 – 0.7:1 and 1.2:1*
- (b) in respect to Area 3 – 2:1 and 2.9:1*
- (c) in respect to Area 4 – 1.6:1 and 2.5:1*
- (d) in respect to Area 5 – 2:1 and 3:1*
- (e) in respect to Area 6 – 2.2:1 and 3.2:1*
- (f) in respect to Area 7 – 0.4:1 and 1.4:1*
- (g) in respect to Area 8 – 3:1 and 4.5:1*

(5) *Consent must not be granted to development on land to which this clause applies unless the consent authority is satisfied that-*

- (a) all lots comprising an area on the Key Sites Map are consolidated into a single lot, with the exception of Area 8,*
- (b) active frontages will be provided,*
- (c) the development will improve the quality of the surrounding public domain.*

(6) *Development subject to subclause (3) that exceeds development standards under Part 4 must not use additional building height or floor space ratio provided under another environmental planning instrument.*

(7) *Development with over 9 dwellings must have at least 30% of the dwellings (to the nearest whole number) as self-contained studio or one bedroom dwellings, or both.*

(8) *In this clause **non-residential** means used for purposes other than residential accommodation.*

5.4. Details of affordable housing component

This planning proposal recommends the introduction of affordable housing provisions for the ECC. SGS Economics and Planning were commissioned by Council staff to carry out feasibility testing on the suggested uplift sites and recommend appropriate rates for the provision of affordable housing.

The testing found that a 3% rate, rising to a 5% rate after three years, would allow an AHCS to apply in the ECC without hampering the economic viability of new development. Details of the testing, and the broader strategic justification for the AHCS, are provided in Part 6 of this planning proposal.

If implemented, amendments to the Woollahra LEP 2014 would require the dedication of affordable dwellings in perpetuity, or payment of an affordable housing contribution to Council (consistent with the AHCS), via a condition of development consent. Any monetary contributions would be pooled and then used to invest in affordable housing assets, made available to lower income workers who meet pre-established criteria.

While the structure of the proposed AHCS allows for both dedications and in lieu contributions, Council has received advice from SGS Economics and Planning and the Community Housing Industry Association that in lieu contributions are preferred. This preference emerges from the consideration of operational burdens, where scattered affordable dwellings present a higher operating expense burden on community housing providers (e.g., fixed and variable costs associated with site-to-site maintenance, management, travel, strata fees etc.).

We also note that section 7.12 development contributions, used to fund local infrastructure works, would be imposed concurrently with any affordable housing contribution.

Unlike the built form controls, Area 1 on the Key Sites Map (former Site F, or 136-148 New South Head Road) is included. While new envelope controls have been gazetted, no development application has been lodged as yet. Accordingly, the inclusion of this site allows Council to obtain an additional affordable housing contribution.

The *Woollahra Affordable Housing Contributions Scheme* itself and the *Woollahra Affordable Housing Contributions Scheme –Report* (AHCS Report), prepared by SGS Economics and Planning, are circulated with this document.

5.5. Affordable housing draft clause

The following text is indicative of what would be included in the Woollahra LEP 2014 to enact the AHCS. Similar to the built form controls, the draft clause would be subject to drafting by the Parliamentary Counsel's Office, should the proposal progress to finalisation.

6.13 Affordable housing in Edgecliff

(1) *This clause applies to land identified as Areas 1 through to 8 on the Key Sites Map.*

(2) *The consent authority may, when granting consent to the carrying out of development (other than development that is **excluded development**) impose a condition requiring a contribution equivalent to the "affordable housing contribution", being—*

- a) for a development application lodged from [COMMENCEMENT DATE OF SCHEME] and up to and including [3 YEARS FROM COMMENCEMENT DATE] — 3% of the total floor area of the development that is intended to be used for residential purposes, and*
- b) for a development application lodged after [3 YEARS FROM COMMENCEMENT DATE] — 5% of the total floor area of the development that is intended to be used for residential purposes.*

(3) *The floor area of any excluded development is not to be included as part of the total floor area of a development for the purposes of calculating the applicable affordable housing contribution.*

(4) *A condition imposed under this clause must satisfy the affordable housing contribution-*

- a) by way of a dedication in favour of the Council of land comprising 1 or more dwellings (each having a total gross floor area of no less than 50 square metres) with any remainder being paid as a monetary contribution to the Council, or*
- b) By way of a monetary contribution to the Council, but only for the purposes of affordable housing.*

(5) *The rate at which monetary contribution is taken to be equivalent to floor area for the purposes of this clause is to be calculated in accordance with the Edgecliff Affordable Housing Contributions Scheme adopted by the Council on [DATE OF ADOPTION].*

Note: *The plan is made available by the Council on its website.*

(6) *To avoid doubt—*

- a) it does not matter whether the floor area, to which a condition under this clause relates, was in existence before, or is created after, the commencement of this clause, or whether or not the floor area concerned replaces a previously existing area, and*
- b) the demolition of a building, or a change in the use of the land, does not give rise to a claim for a refund of any contribution.*

(7) *In this clause—*

"excluded development" *means development for the following purposes—*

- a) development for the purposes of residential accommodation that will result in the creation of less than 100 square metres of total floor area,*

- b) development for the purposes of residential accommodation that involves a change of use of existing floor area from other than residential accommodation to residential accommodation that will result in a change of use affecting less than 100 square metres of total floor area,*
- c) development for the purposes of residential accommodation that is used to provide public or affordable housing in perpetuity.*

"total floor area" means the total of the areas of each floor of a building within the outer face of the external enclosing walls and including balconies, but excluding the following—

- a) columns, fins, sun control devices, awnings and other elements, projections or works outside the general lines of the outer face of the external walls,*
- b) any area of a balcony that is more than the minimum area required by the consent authority in respect of the balcony,*
- c) the maximum ancillary car parking permitted by the consent authority and any associated internal vehicular and pedestrian access to that car parking,*
- d) space for the loading and unloading of goods.*

6. Justification

This section establishes the need for a planning proposal, achieving the key outcomes and objectives. The set questions below address the strategic origins of the proposal and whether amending the Woollahra LEP 2014 is the best approach to achieve its aims.

6.1. Section A - Need for planning proposal

6.1.1. *Is the planning proposal a result of an endorsed local strategic planning statement, strategic study or report?*

The planning proposal is a result of the ECC Strategy, which was endorsed by Council on 29 April 2024. The built form outcomes from this strategy directly inform the scope of the Woollahra LEP 2014 amendments sought.

The AHCS Report prepared by SGS Economics and Planning forms the basis of the AHCS sought as part of this planning proposal. This component directly responds to affordable housing objectives in the ECC Strategy, as well as the *Woollahra Local Housing Strategy 2021* (Woollahra LHS 2021).

1. ECC Strategy foundation – Urban Design Study

The ECC Strategy is the guiding document that provides direction for the future growth of the ECC. The Edgecliff ECC establishes a vision for the ECC and provides recommendations on proposed planning controls, urban design outcomes, public domain improvements and transport enhancements to guide future development.

The *Edgecliff Commercial Centre Study* (the Urban Design Study) prepared by SJB informed the recommendations of the ECC Strategy. It contains the baseline research used to identify the preferred built form and urban design outcome for the ECC. It includes a detailed analysis of the study area, identification of opportunities and constraints, design principles, scenario testing, development of the preferred built form and recommendations to achieve the desired future character for the ECC.

The Urban Design Study tested three unique development scenarios in order to develop a preferred scenario for the ECC based on themes emerging from the site testing. The minimum and maximum range of built forms recommended in each scenario was informed by a market analysis commissioned by Council

A summary of the three scenarios is discussed below:

- Scenario 1: This scenario only considered existing or known proposed uplift. This consisted of three opportunity sites identified by Council in 2009, one approved development application and one approved planning proposal. The resulting built form was mixed use development with a height of four to 15 storeys, scattered across a limited number of sites.
- Scenario 2: This scenario considered a uniform increase in development potential across all sites in the ECC. It did not take into account the natural topography of the ECC, or the work of the Opportunity Sites. The resulting built form included commercial, retail and residential uses evenly distributed across the ECC with a height generally between six to eight storeys.

- Scenario 3: This scenario focused the maximum employment floor space around Edgecliff train station, and distributed retail and residential uses across the rest of the ECC. The resulting built form was the greatest with a height ranging from four to 26 storeys, which included a mix of commercial and residential towers.

Having taken into account the natural topography, heritage conservation, overshadowing, amenity and access, the preferred scenario combined elements from Scenarios 1, 2 and 3.

The preferred scenario, used to inform the ECC Strategy, also had regard to economic conditions and provided forecasts for future demand for retail, commercial and residential floor space in the ECC. Market analysis commissioned by Council identified strong potential for residential growth in the ECC in conjunction with retail and office uses.

2. ECC Strategy – overview

The exhibited version of the ECC Strategy was the result of the preferred scenario identified above. Its objective was to revitalise the ECC by creating a clear and coordinated framework to facilitate development that:

- Provides high quality transit oriented development with a suitable mix of uses;
- Displays design excellence;
- Upgrades the public domain and enhances active transport;
- Protects heritage;
- Provides affordable housing; and
- Contributes to the delivery of community infrastructure.

It was publicly exhibited from 31 May 2021 to 30 September 2021, where comment was sought from local residents, business, community groups and government bodies. This included posting 9000 letters to surrounding property owners and/or residents. In response, Council received 153 submissions and 123 online survey responses

3. ECC Strategy – post-exhibition amendments

Following public exhibition, as detailed in Chapter 4.2 of the ECC Strategy, Council staff amended the document to respond to issues raised in submissions.

The updates included the:

- Preservation of the entrance to the Woollahra LGA and ECC as the Western Basin;
- Amendment of the review sites to focus uplift around Edgecliff Station, with the updated ECC Strategy focusing additional height and floor space on sites that:
 - Are closer to Edgecliff Station;
 - Have a frontage to New South Head Road;
 - Have potential for higher housing yield;
 - Have no identified heritage or character value; and
 - Will not interrupt the view of the Paddington basin.
- Review of built form controls, through additional urban design testing, to ensure all adjusted building height and FSR controls align with one another;
- Inclusion of design principles for the Edgecliff Centre site (discussed more later);

- Adjustment of built form recommendations near potential heritage items, resulting from the Edgecliff Heritage Study; and
- Revision of amalgamation patterns for uplift sites to factor in all of the above.

The resulting final version of the ECC Strategy is therefore the result of a fine-grain, site-by-site review of the ECC and is informed by supporting urban design, traffic, economic, and heritage studies. There are no recommendations for blanket changes to planning provisions. It seeks to support the development of each site in accordance with the desired character of the area.

The adopted ECC Strategy is a clear reflection of the community and Council's position on the desired future character of the ECC. This planning proposal implements the key vision and recommendations set out in the ECC Strategy.

The recommended built form will generally follow the sloping topography of the ECC with the tallest buildings around Edgecliff Station. Current building heights within the Western Basin precinct will be preserved. This will enable retention of the apartment buildings that contribute to housing diversity.

New vehicle entries will be restricted to secondary streets, away from New South Head Road, to minimise congestion and improve public domain and street activation.

The proposed built form will ensure that solar access to Trumper Park and Oval, the Paddington HCA and existing dwellings is maintained. At a minimum, development will be required to allow two hours of direct sunlight between 10.00am and 2.00pm on 21 June. Narrow floorplates will be encouraged, wherever possible, to facilitate fast-moving shadows and minimise impacts on existing solar access.

4. ECC Strategy – Edgecliff Centre site

The existing Edgecliff Centre building (203-233 New South Head Road) is a key site in the ECC due to its size, its location next to the Edgecliff Station, and its location at the top of the ridge.

The proposed height provides for a landmark development at the ECC's core, marking the top of the hill and Edgecliff Station, while not overwhelming nearby residential areas and public spaces (**Figure 5**). The scale of the built form proposed is appropriate to its location and role in the strategic centre hierarchy. This proposal recommends a building height of 86 metres (26 storeys). A maximum FSR of 7.5:1 and a minimum non-residential FSR of 3:1 are also recommended to help retain and enhance the role of the Local Commercial Core.

A development measuring 26 storeys on the Edgecliff Centre site would result in the tallest building within the ECC. However, it will not produce any unreasonable environmental planning impacts. For instance, solar analysis indicates development on the Edgecliff Centre site would not produce excessive overshadowing. Trumper Oval would receive no additional shadowing after 10.00am in mid-winter. Dwellings south of the ECC will also be capable of receiving at least two hours of sunlight to their private open spaces.

This uplift site, unlike others identified in this planning proposal, also does not have any amalgamation requirements. Council owns the southern section of land comprising the area of the Key Sites Map. Accordingly, if an amalgamation requirement were imposed, it could have an influence on Council's negotiating power for the necessary sale of the land (to merge it with the privately held land). As such, the sites will be allowed to remain separated to avoid this issue.



Figure 5: Graph showing growth in dwelling sizes, 2011-2021 (SGS, 2024)

5. ECC Strategy – other local provisions

In addition to key building envelope controls, the ECC Strategy also makes recommendations on lot amalgamation, public domain treatments, active frontages and housing diversity. Other local provisions are proposed to capture these elements and ensure the delivery of high-quality planning outcomes in the ECC.

Uplift envisaged under the ECC Strategy assumes the amalgamation of fragmented lots in the ECC. This process allows for efficient floorplates, simpler vehicular access and enhanced opportunities to provide amenity. Accordingly, the draft clause requires all lots (except the Edgecliff Centre site, Area 8) within one area of the Key Sites Map to be amalgamated before increased building height and FSR can be accessed. The planning proposal suggests this approach for the draft clause instead of individually nominating lot numbers as the legal description of lots can change, and excessive text would make the clause less legible.

The ECC Strategy also places focus on the enhancement of the public domain. A specific vision for this is incorporated within the accompanying Public Domain Plan, and its implementation will be facilitated by new controls in the draft DCP. However, to ensure its delivery, it is appropriate to reference improvements to the quality of the public domain in the draft Woollahra LEP 2014 clause as well. This will ensure the DCP provisions are supported, and that high quality public domain outcomes (such as tree planting or the replacement of pavers) can be facilitated through development consents.

The activation of street frontages also underpins placemaking outcomes in the ECC Strategy. Accordingly, the draft clause also requires new development to provide active frontages. These will contribute to place identity, increase commercial vitality and allow passive surveillance of the streetscape.

Additionally, the ECC Strategy identifies the importance of diverse housing. Due to market factors, apartment delivery in the Woollahra LGA is biased towards larger dwellings aimed at families or residents downsizing from detached houses. While it is important that these demographics continue to be catered for, it is also essential that smaller, lower cost

dwellings are available for couples and singles. Only 12.5% of dwellings in the LGA are studios and one bedroom dwellings (ABS, 2021). This was the fastest growing typology across the Eastern Harbour City and Greater Sydney over the last decade, increasing by 38 percent and 43 percent, respectively. In contrast, Woollahra saw a one percent decline in one-bedroom and studio dwellings over the same timeframe. Larger dwellings saw positive growth in Woollahra, particularly four-bedroom homes which grew by 18 percent (see **Figure 6**).

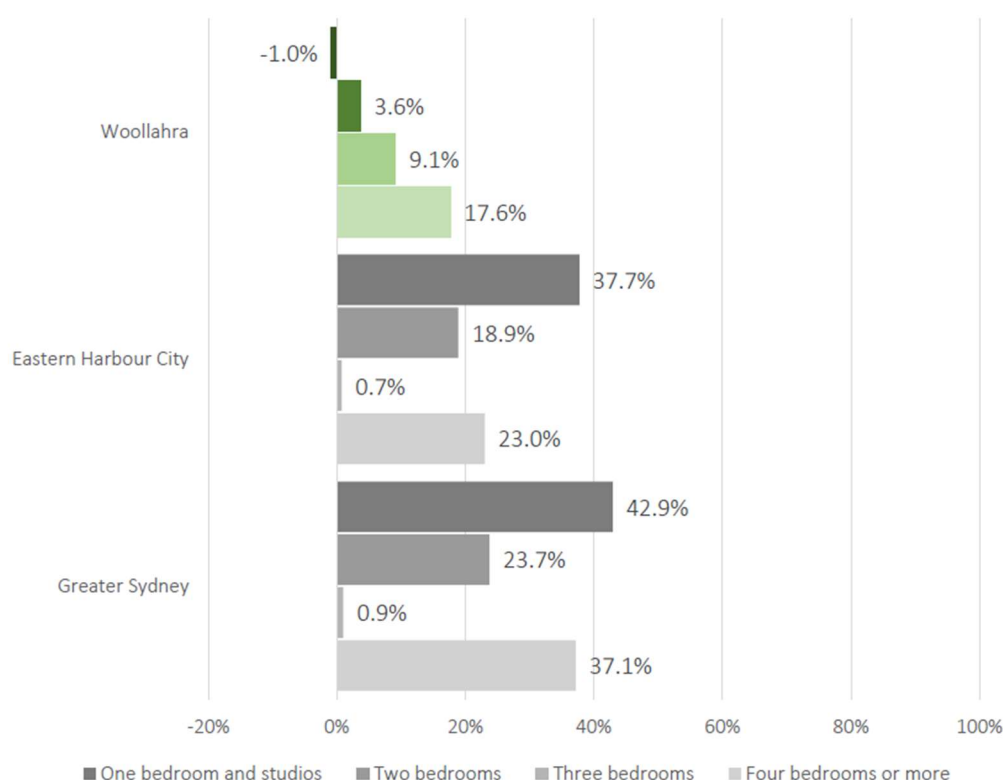


Figure 6: Graph showing growth in dwelling sizes, 2011-2021 (SGS, 2024)

Accordingly, the draft clause requires buildings with over nine dwellings to have at least 30% of them (to the nearest whole number) as self-contained studio or one-bedroom dwellings, or both. The nine dwelling figure is based on a staff investigation of the average dwelling yield of new development in the vicinity, and where it would be feasible to require a mix. The 30% share of total dwellings aligns with the 30% share of lone households in the LGA, and the similar 27% of households with couples without children. This approach is consistent with those of the *Canada Bay Local Environmental Plan 2013* and *Inner West Local Environmental 2022*, which both including dwelling mix provisions.

The drafting of the clause applies the public domain, active frontage and dwelling mix provisions to the whole of the ECC. While they are initially intended for the uplift sites, they will ensure that any future redevelopment not anticipated in the ECC Strategy will still provide high quality outcomes.

6. ECC Strategy – Non-residential floor space

The ECC Strategy also recommends minimum non-residential FSRs to ensure the provision of employment-generating floor space, which is important for the future vitality of the ECC. However, it does not recommend maximum non-residential FSRs. Nominating these at planning proposal stage is important as they will prevent the development of wholly

commercial buildings and assist with Council complying with its housing targets. As such, the draft clause recommends an FSR range for non-residential uses.

The maximum non-residential FSRs have been developed by adding 20% to the minimum FSRs, as a percentage of the total FSR for the site. For example, a minimum FSR that comprises 30% of the total allowable gross floor area would have a corresponding 50% maximum. The 20% figure was selected to provide appropriate flexibility in floorplate design, having regard to the unique characteristics of each included site.

7. ECC Strategy – Housing SEPP provisions

On 14 December 2023, the NSW Government implemented infill affordable housing reforms to encourage the provision of affordable housing. They include an FSR bonus of 20–30% and a height bonus of up to 30% for projects that include at least 10-15% of gross floor area as affordable housing. The affordable housing under this scheme must be provided for only 15 years.

While Council supports the incentivisation of affordable housing, the bonuses available under *State Environmental Planning Policy (Housing) 2021* (Housing SEPP) are not compatible with the provisions of this planning proposal. Uplift beyond the recommended controls would adversely affect the desired future character of the precincts and produce amenity outcomes not anticipated by Council staff. Accordingly, the draft provisions recommend that no bonuses from any other environmental planning instrument apply if the increased envelope controls are taken up.

8. SGS Affordable Housing Study 2024

In line with the adopted ECC Strategy, this planning proposal seeks the implementation of an AHCS in the ECC via the implantation of a new affordable housing clause in the Woollahra LEP 2014. The AHCS Report prepared by SGS Economics and Planning is circulated with this document and forms the primary evidence base and justification for the scheme. The accompanying *Edgecliff Affordable Housing Contributions Scheme*, which would facilitate the operation of the AHCS, is also enclosed with this document

The proposed AHCS is justified by the worsening housing affordability crisis across Greater Sydney, which is being felt acutely by residents of the Woollahra LGA. The Woollahra LHS 2021 identifies there is a significant shortfall in the supply of affordable housing when compared to demand. This creates an issue when one-third of all renter households are living in housing stress, meaning they spend more than 30% of their pre-tax income on rent (SGS, 2024). This is set to worsen with 3,367 renter households in housing stress by 2041, an increase of 722 households.

SGS Economics and Planning developed the basis for the AHCS in full compliance with the NSW Government's *Guideline for Development an Affordable Housing Contributions Scheme*. The AHCS Report was developed using the following methodology:

1. Review of legislative and policy framework - to ensure compliance with the EP&A Act and relevant Council strategies and plans.
2. Developing an affordable housing evidence base – detailed research on trends and conditions in the housing market, such as housing demand drivers (e.g., population and household growth and cohort shifts), housing sales and rent trend, household incomes, households by tenure and rental stress, housing supply conditions, dwelling stock by type and projections of need for social and affordable housing.

3. Nomination of areas for testing- to capture relevant areas of uplift and identify redevelopment typologies for testing.
4. Testing the viability of affordable housing contributions – to examine (using a residual land value, or RLV methodology¹) redevelopment viability with the proposed uplift, with varying degrees of additional uplift, with varying potential contribution rates, and with projections of market conditions.

Based on the findings of the viability testing, the AHCS Report recommended the following:

- Council pursue a contribution rate of 5%, with analysis demonstrating that viability can be achieved across all sites with a 5% AHC (either in-kind or in-lieu contribution) within five to ten years.
- That a lower contribution rate of 3% be employed until 5% becomes viable, consistent with the approach of other councils with similar circumstances.

These rates are reflected in the draft clause in this planning proposal, and in the *Edgecliff Affordable Housing Contributions Scheme*. The dollar amount for the in-lieu contribution rate is based off the median strata sales price for the last 12 months, and is also grounded in current new dwelling sales data obtained from Council's consultant. This is consistent with industry best practice.

6.1.2. *Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?*

Yes. A planning proposal is the best means and most efficient way to amend the controls necessary to achieve the objectives outlined in this document. This planning proposal is underpinned by a comprehensive, evidence-based strategy informed by technical studies.

Built form in the ECC is undergoing a significant transition, with pressure from development applications that exceed the height and FSR limits contained in the current planning controls. In the absence of a comprehensive and up to date planning framework, development has been taking place in a fragmented and uncoordinated way. A single planning proposal that applies to the ECC is the most rational and orderly means to implement the recommendations and directions of the ECC Strategy to achieve the outcomes for employment, dwellings, and affordable housing. A planning proposal is also necessary to amend development standards within the Woollahra LEP 2014. This would not be possible with a draft DCP.

An alternative method, such as relying on individual site-specific and ad hoc planning, would be an inefficient means of achieving the objectives of the District Plan and the *Woollahra Local Strategic Planning Statement 2020* (Woollahra LSPS 2020). It will derogate from Council's ability to co-ordinate development and supporting infrastructure that achieves consistent and innovative place-based outcomes. Growth should be managed in a proactive and coordinated manner.

¹ RLV modelling seeks to determine the viability of redevelopment by determining the underlying value of a development site by subtracting all costs (construction, soft costs, finance costs, risk, etc.) from the gross realisable value of the proposed built form.

6.2. Section B - Relationship to strategic planning framework

6.2.1. Will the planning proposal give effect to the objectives and actions of the applicable regional or district plan or strategy (including exhibited draft plans or strategies)?

Yes. The planning proposal is consistent with the relevant objectives of the *Greater Sydney Region Plan: A Metropolis of Three Cities* (2018) and the relevant planning priorities and actions of the *Eastern City District Plan* (2018), as discussed below.

1. Greater Sydney Region Plan: A Metropolis of Three Cities

The planning proposal is consistent with the directions and objectives of *Greater Sydney Region Plan: A Metropolis of Three Cities* (Region Plan), as outlined in **Table 4**.

Table 4: Compliance with Region Plan.

Objectives	Planning proposal response
Objective 4: Infrastructure use is optimised	The planning proposal will facilitate an increase in housing density in an area well-served by public transport and other amenities, making more effective use of existing regional infrastructure (such as public transport, roads, schools and hospitals).
Objective 6: Services and infrastructure meet communities' changing needs.	Proposed changes to the Woollahra LEP 2014, including increases in height and FSR, as well as specific clauses to guide apartment unit mix will have implications on the urban fabric of the ECC. This residential uplift and the provision of a variety of apartment sizes will bring more varied demographics to the ECC, thereby addressing Objective 7 of the Region Plan to facilitate resilient, diverse communities.
Objective 7: Communities are healthy, resilient and socially connected	<p>Access to services and infrastructure</p> <p>The ECC has relatively good access to community facilities, cultural precincts, health services and open spaces, which are all essential pieces of social infrastructure that enhance social opportunity in a centre. This adheres to Objective 6 and 7 of the Region Plan.</p> <p>The ECC Strategy and the Public Domain Plan underpinning this planning proposal outline a range of initiatives to help achieve a healthier urban environment in the ECC including:</p> <ul style="list-style-type: none">• Requirement for a public open space as a part of any redevelopment of the Edgecliff Centre Site (203- 233 New South Head Road);• Increasing urban greening in the ECC, enhancing the amenity of existing parks and providing better connections to open spaces;• Promoting active street life through human scale development, requiring ground floor active street frontages and substantial improvements to the public domain such as wider footpaths, outdoor dining, street trees and landscaping, street furniture and public art; and• Prioritising active transport through provision of new cycleways, and improvements to pedestrian access and safety through the public domain including through-site links, and new lighting, pedestrian crossings and wayfinding

Objectives	Planning proposal response
	<p>All of these components together foster social opportunity, ensuring that the future community of Edgecliff have the facilities and services available to live and belong to the community.</p> <p>The planning proposal will also improve liveability within the ECC by contributing to the development of mixed-use neighbourhoods that improve opportunities for people to walk and cycle to schools, local shops and services.</p>
<p>Objective 10: Greater housing supply</p> <p>Objective 11: Housing is more diverse and affordable</p>	<p>The planning proposal creates more capacity for new housing in the right locations. This planning proposal supports Objective 10 and 11 of the Region Plan as it provides for greater housing supply, choice and diversity by:</p> <ul style="list-style-type: none"> • Delivering between 490-615 additional dwellings through proposed changes to built form controls. • Requiring a mix of apartment sizes. <p>The planning proposal also requires an affordable housing contribution for nominated development within the ECC to increase the provision of affordable housing.</p> <p>The proposed controls for studio and one bedroom apartments are expected to reduce the price point for entry into the Edgecliff housing or rental market and increase housing choice in a well-located and well-serviced centre. We anticipate that these housing opportunities will then attract younger demographics to live and work in the ECC.</p>
<p>Objective 12: Great places that bring people together</p> <p>Objective 13: Environmental heritage is identified, conserved and enhanced</p>	<p>The ECC Strategy was developed using a fine grain approach, to ensure that future building envelopes enabled by the controls result in appropriate heights, scale, setbacks and floorplates. The envelopes are designed to provide good internal amenity and compliance with the Housing SEPP and the <i>Apartment Design Guide</i> (ADG).</p> <p>The revision of the built form controls applying to the uplift sites will ensure an attractive and well-designed built environment for the ECC. The new controls will also require new development to appropriately relate to the surrounding neighbourhood.</p> <p>Increasing economic viability in the area will improve the quality of the built environment by encouraging the replacement of poor quality buildings with newer buildings.</p> <p>New development will generate increased income through development contributions which will be directed towards implementing public domain improvements to street lighting, wayfinding, laneway activation, and open spaces. These components will improve liveability throughout the ECC for both its residents and visitors, thereby addressing Objective 12 of the Region Plan.</p> <p>Consultation with the community during the exhibition of the ECC Strategy also enabled an understanding of the heritage values and how they contribute to the significance of the place. In response to issues raised during the public exhibition of the draft ECC Strategy, Council engaged GML Heritage in 2022 to undertake a study of buildings in the area. The purpose of the study was to consider and identify places with heritage value that meet the criteria for listing under</p>

Objectives	Planning proposal response
	<p>the Woollahra LEP 2014. The outcomes of the study informed significant amendments to the ECC Strategy.</p> <p>Therefore, the proposed built form controls of the planning proposal are influenced by a separate planning proposal (PP-2024-1101) to list eight new heritage items and one HCA within the ECC. The proposed controls ensure that any changes to height and FSR are sympathetic to the significance of the heritage items and HCA within the ECC and would deliver sensitive development outcomes. This gives effect to Objective 13 of the Region Plan.</p>
Objective 14: A Metropolis of Three Cities – integrated land use and transport creates walkable and 30-minute cities	<p>This planning proposal integrates land use and transport by concentrating housing and employment close to the Sydney CBD and public transport infrastructure.</p> <p>The planning proposal will increase the local community's capacity to live within 15 minutes of the Sydney CBD.</p>
Objective 22: Investment and business activity in centres	<p>The planning proposal supports the overall renewal of the ECC facilitating growth of retail, health services and hospitality.</p>

Eastern City District Plan

The *Eastern City District Plan* (District Plan) identifies Edgecliff as a local centre located in close proximity to Bondi Junction (identified as a strategic centre).

The District Plan indicates opportunities should be taken to better align growth with infrastructure by considering the capacity of existing infrastructure and includes the following objective:

“Aligning growth with infrastructure, including transport, social and green infrastructure, and delivering sustainable, smart and adaptable solutions”.

The District Plan has also identified the ECC for potential housing, retail and commercial growth opportunities within a 400m walking catchment of its public transport nodes. As outlined in the previous section, this planning proposal implements this vision by enabling development at a higher density and creating wider public benefits via modern employment and residential floor space.

In particular, the planning proposal directly aligns with the following planning priorities in **Table 5**.

Table 5: Compliance with District Plan.

Priorities	Planning proposal response
Planning Priority E5 Providing housing supply, choice and affordability, with access to jobs, services and public transport	<p>The ECC is primely positioned in the Eastern City District to facilitate a highly liveable centre with increased and sustainable housing, jobs and services. This planning proposal provides an opportunity for the ECC to contribute to the future growth of the District by creating additional housing and infrastructure such as services and accommodation.</p> <p>The District Plan identifies the ECC as a local centre, capable of accommodating moderate growth to meet the needs of the local community. The scale of built form facilitated through the planning</p>

Priorities	Planning proposal response
	<p>provisions are appropriate, and reinforce the role of the ECC as a local centre. The ECC has, and will continue to have, a moderate amount of retail and employment space. It is not a major employment hub, nor does it have the extensive range of retail, commercial, and services that are characteristic of most strategic centres.</p> <p>The proposed amendments to FSR and height of building provisions will provide additional capacity for approximately 490-615 dwellings which would significantly contribute to the Eastern City District Plan's dwelling target.</p> <p>In May 2024, the Department of Planning, Housing and Infrastructure (DPHI) identified a new five year housing completion target of 1,900 dwellings for the Woollahra LGA. The outcomes of the ECC Strategy will also contribute to these targets.</p> <p>Additionally, the District Plan proposes affordable housing targets that build on <i>A Plan for Growing Sydney</i>. It recommends a range of 5 – 10% of new floor space on land that has been re-zoned where a need for affordable housing has been identified. This planning proposal is consistent with that direction.</p>
Planning Priority E6 Creating and renewing great places and local centres, and respecting the District's heritage	<p>The planning proposal will assist with renewing the ECC by facilitating urban renewal and development at the select sites. It will do this by increasing feasibility for underutilised sites.</p> <p>Centre-wide DCP controls will be introduced that enable active frontages, pedestrianised streets, new plazas/civic spaces and urban greening. These controls will aim to enhance the vibrancy of the ECC and reinforce a human-scale public domain.</p> <p>The ECC Strategy seeks to protect the character of existing and proposed heritage items and HCAs through crafting sensitive built form solutions. The planning proposal's built form recommendations align with this approach.</p>

6.2.2. *Is the planning proposal consistent with a council LSPS that has been endorsed by the Planning Secretary or GSC, or another endorsed local strategy or strategic plan?*

1. Woollahra Local Strategic Planning Statement

The proposed changes to the planning controls in the ECC are consistent with the Woollahra LSPS 2020, a plan which sets out a 20-year vision for the Woollahra LGA and its centres. Organised under four themes of Infrastructure & Collaboration, Liveability, Productivity and Sustainability, the Woollahra LSPS 2020 aims to:

- Manage future growth, new technology, and changing community needs;
- Conserve our heritage, villages, local character, and environment;
- Ensure resilience and sustainability despite challenges such as climate change;
- Identify areas for further detailed strategic planning; and
- Link our plans to the implementation of the NSW Government's strategic plans.

The ECC Strategy, that underpins this planning proposal, gives effect to the priorities and actions of the Woollahra LSPS 2020, which relies on the revitalisation of the ECC and promotes diverse housing choices in planned locations.

The Woollahra LSPS 2020 identifies the ECC as an important hub for local productivity. It also highlights the importance of protecting and enhancing employment space in our villages. The inclusion of a minimum non-residential FSR in this planning proposal reinforces this objective and would promote growth of jobs, businesses and services in a well- located area.

Revitalising the ECC through the implementation of the proposed controls, and effective placemaking strategies will enhance the role of the local centre, making it a place the community wants to work in, visit, stay and live.

2. Woollahra Local Housing Strategy

The Woollahra LHS 2021 establishes the long-term housing vision for our local area. The proposed amendments are consistent with the vision of the Woollahra LHS 2021 to facilitate new housing in well-planned locations that are close to villages, services and public transport hubs, such as the Edgecliff Centre. In particular, the Woollahra LHS 2021 outlines that housing growth and uplift should ideally:

“Be located within 400m easy walking distance of both an existing a local centre and high-frequency public transport service consistent with the vision for a 30-minute city.”

The Woollahra LHS 2021 identifies that Woollahra’s housing targets will be primarily met in the ECC, it being the only area within the LGA that is capable of accommodating growth without NSW Government investment in major infrastructure and services. This planning proposal implements the housing targets identified in the Woollahra LHS.

The Woollahra LHS 2021 includes an aspirational target of 5% affordable housing. This planning proposal sets an affordable housing contribution (for uplift sites) at a variable rate of 3% for three years after the scheme’s commencement, and then increased to 5% to ensure feasibility.

The planning proposal also gives effect to the recommended action of the Woollahra LHS 2021 to encourage a range of housing choices through the introduction of unit mix provisions. The planning proposal introduces a clause to include a minimum 30% requirement for studio dwellings or one-bedroom dwellings in new development within the ECC. By providing a mix of units the planning proposal aims to attract a wider range of social groups, particularly young workers.

3. Woollahra Community Strategic Plan

Adopted in 2022, Woollahra Community Strategic Plan *Woollahra 2032* characterises the community, sets out current and future social, environmental and economic challenges, while additionally guiding potential strategies to address these issues.

The planning proposal is consistent with the following goals:

- *Goal 4: Well-planned neighbourhoods;*
- *Goal 5: Liveable places; and*
- *Goal 9: Community focused economic development.*

Council values the community as a source of local expertise and actively seeks feedback to help shape decisions that affect residents and people who visit, work or go to school in Woollahra. This approach is consistent with the plan. The feedback obtained from the community on the exhibited ECC Strategy has been carefully considered with significant amendments made to the final ECC Strategy to address local issues.

6.2.3. *Is the planning proposal consistent with any other applicable State and regional studies or strategies?*

Yes. The planning proposal is consistent with the NSW Government's *Housing 2041* and *Future Transport Strategy*.

The planning proposal aligns with key ambitions of *Housing 2041* as follows:

- It will increase support for those in need, by establishing an AHCS intended to contribute to the supply of affordable housing;
- It will promote investment for diverse housing, through the unit mix clause recommended for the Woollahra LEP 2014; and
- Through concentrating growth around Edgecliff Station, it will improve the alignment of new housing with mass transit infrastructure.

The planning proposal is also consistent with the Future Transport Strategy, as it will promote transit-oriented development and contribute to the efficient use of public transport infrastructure in NSW.

6.2.4. *Is the planning proposal consistent with applicable State Environmental Planning Policies?*

Yes. The planning proposal is consistent with the *Standard Instrument – Principal Local Environmental Plan* and all other applicable State Environmental Planning Policies (refer to **Schedule 1**).

6.2.5. *Is the planning proposal consistent with applicable Ministerial Directions (s.9.1 directions)?*

Yes. The planning proposal is consistent with applicable section 9.1 directions (refer to **Schedule 2**).

6.3. Section C - Environmental, social and economic impact

6.3.1. *Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected because of the proposal?*

No. This planning proposal relates to an existing centre in an urbanised environment and seeks to increase densities within this footprint. There are no critical habitat areas, threatened species, populations or ecological communities or their habitats present on the subject land. Accordingly, the proposal will not have any impact in this regard.

6.3.2. *Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?*

No. There are no likely environmental effects that would arise as a result of the planning proposal. Other environmental effects that might arise through the redevelopment of the

sites would be identified through the development application process. Good design and conditions of consent will limit these effects.

Any other environmental effects will be managed through updates to Woollahra DCP 2015-*Chapter D4 Edgecliff Commercial Centre*. These will include best practice sustainability standards and environmental mitigation measures to ensure minimal ecological impacts to Trumper Park.

6.3.3. *Has the planning proposal adequately addressed any social and economic effects?*

1. Economic Impacts

The proposed amendments will stimulate economic activity in the ECC, firstly through construction-related jobs and secondly through increased opportunities for commercial services. The retail and commercial floor space delivered through this proposal will support employment generation and encourage spending within the local centre.

The proposed FSRs have also been subject to economic viability testing by SGS Economics and Planning to provide greater certainty that the development potential provided will justify the redevelopment of existing assets.

2. Social Impacts

The planning proposal is seeking to facilitate redevelopment, whilst ensuring local amenity and character is preserved. The planning proposal will deliver positive social effects including:

- Enabling housing and employment growth in a desirable area that has good access to community facilities, cultural precincts, health services and open spaces, which are all essential pieces of social infrastructure and will enhance social opportunity in the ECC;
- The uplift proposed will facilitate the delivery of public benefits such as an affordable housing contribution, an enhanced public domain, retention of employment and retail space, and significant residential yield.
- The proposed controls for residential unit mix would increase housing choice and supply in a well-located centre.

6.4. Section D - Infrastructure (Local, State and Commonwealth)

6.4.1. *Is there adequate public infrastructure for the planning proposal?*

Yes. The ECC is serviced by existing public infrastructure, including regular and frequent public transport services, education, public open space, and community and health facilities. The subject properties are connected to water, sewer, electricity, and telephone services.

In terms of water and sewage services, Sydney Water have provided confirmation that the water and wastewater system has adequate capacity to service the proposed development anticipated by the planning proposal.

The Transport Study was undertaken by SCT Consulting in 2024 to analyse existing and future transport capacity within the ECC. It notes the proposed scope of development supports best practice transit-oriented development principles, by providing increased residential and employment density close to mass transit infrastructure.

Based on the adopted trip generation rates of the respective land uses, the Transport Study notes the proposed increase in development yield in the ECC will generate a total of 117

additional vehicular trips during the weekday AM peak hour and 55 additional vehicular trips during the weekday PM peak hour.

Road network analysis shows that performance of the local network will continue to operate at acceptable levels with the trips generated by the potential development. In the AM peak hour, the greatest impact on the road network performance is forecast to be at the New South Head Road / Ocean Street / Ocean Avenue and the New South Head Road / Darling Point Road / New McLean Streets intersections, which will operate with a Level of Service (LoS) C and B, compared to LoS B and LoS A in the existing scenario.

Overall, the New South Head Road / New Beach Road and the New South Head Road / Glenmore Road / Mona Road intersections will continue to perform satisfactorily for all time periods, with the added trips in peak hours.

The study recommends several strategies to help ensure a successful outcome for potential development. These include methods to reduce trip generation (such as limiting additional parking), introducing green travel plan programs and car share schemes, and further improving active transport infrastructure. Parking restrictions would be accommodated in a complementary amendment to the Woollahra DCP 2015.

Infrastructure improvements suggested include the introduction of new signalised pedestrian crossings, optimisation of signal phasing, and pedestrian crossing improvements.

In a submission to the ECC Strategy, Schools Infrastructure NSW noted that local schools are expected to experience growth in their intake areas, which may require asset intervention to meet demand. Based on population projection data, the uplift may result in increased demand for one additional primary teaching space and up to one additional secondary teaching space. They considered that a combination of asset improvement and non-asset solutions across these schools could be required to accommodate the projected enrolment demand.

Notwithstanding the above, Council will consult with public utility and service providers during the public exhibition when required, including Transport for NSW and Schools Infrastructure NSW.

6.5. State and Commonwealth Interests

6.5.1. *What are the views of State and Commonwealth public authorities consulted in accordance with the Gateway determination?*

This section will be completed following consultation with public authorities identified in the Gateway determination. Public authorities, including but not limited to, will be notified:

- Sydney Water;
- School Infrastructure NSW;
- Transport for NSW; and
- Heritage NSW.

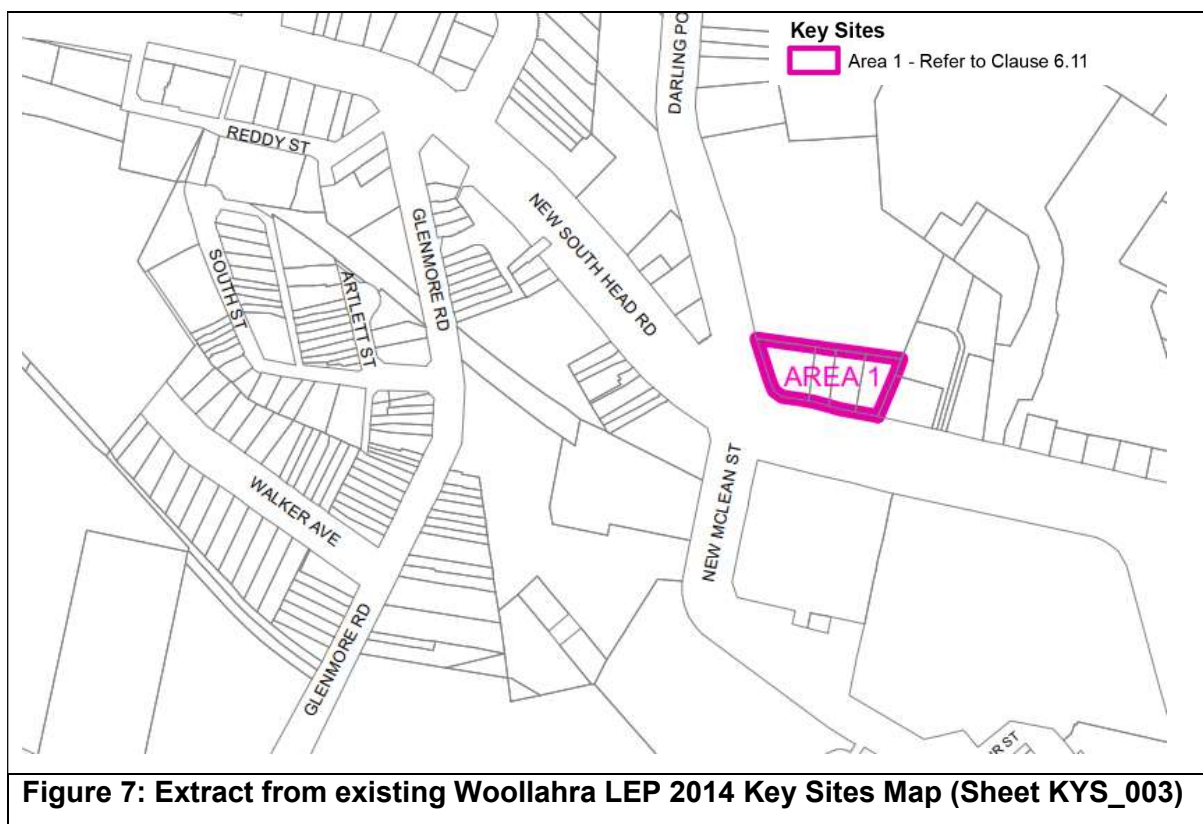
Any other authorities identified by the DPHI will be consulted during the public exhibition of the planning proposal.

7. Mapping

The planning proposal seeks to amend the Key Sites Map (Sheet KYS_003) under the existing Woollahra LEP 2014 maps to identify areas of uplift and create a new Local Identification Map (Sheet CL1_003) that outlines the extent of the ECC.

Areas within the ECC have been identified on the Key Sites Map that will refer to the proposed exceptions subclause under *6.12 Development on land in the Edgecliff Commercial Centre*. The alternative building height and FSR standards are subject to the sites achieving specific criteria.

Extracts of the existing and proposed maps are provided in the figures on the following pages.



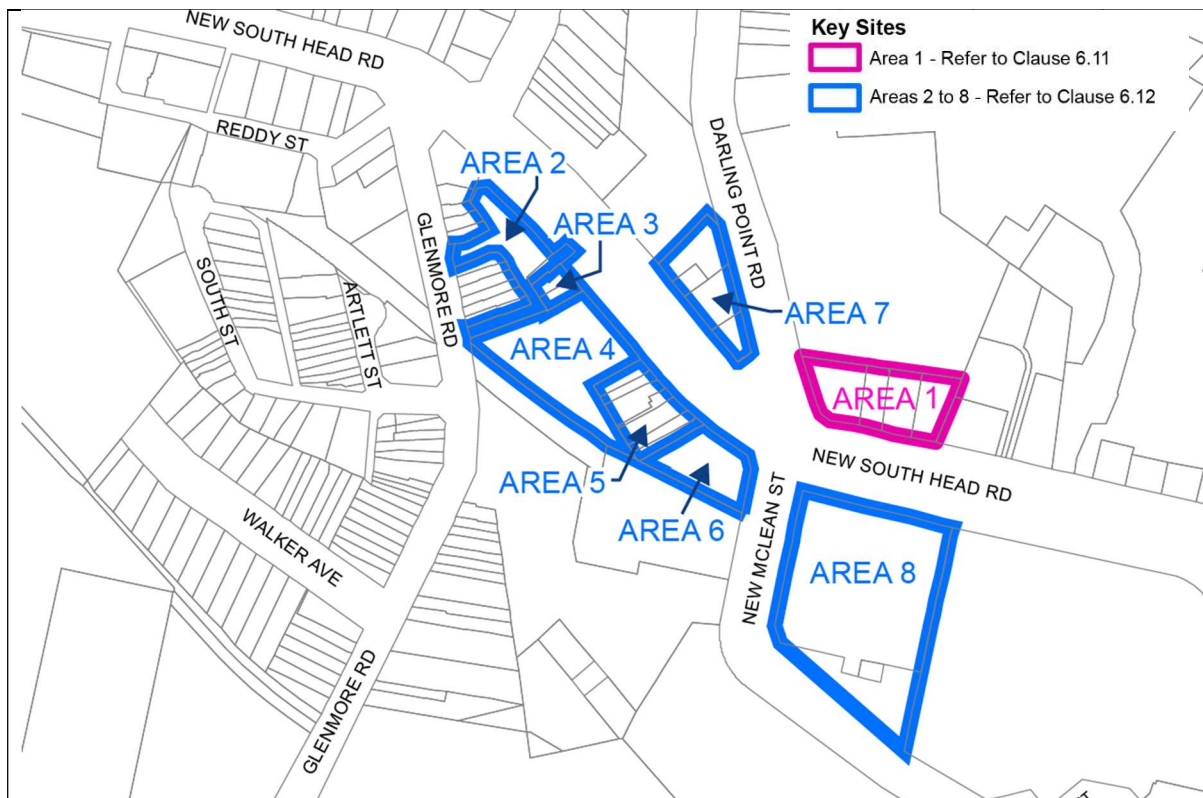


Figure 8: Extract from proposed Woollahra LEP 2014 Key Sites Map (Sheet KYS_003)

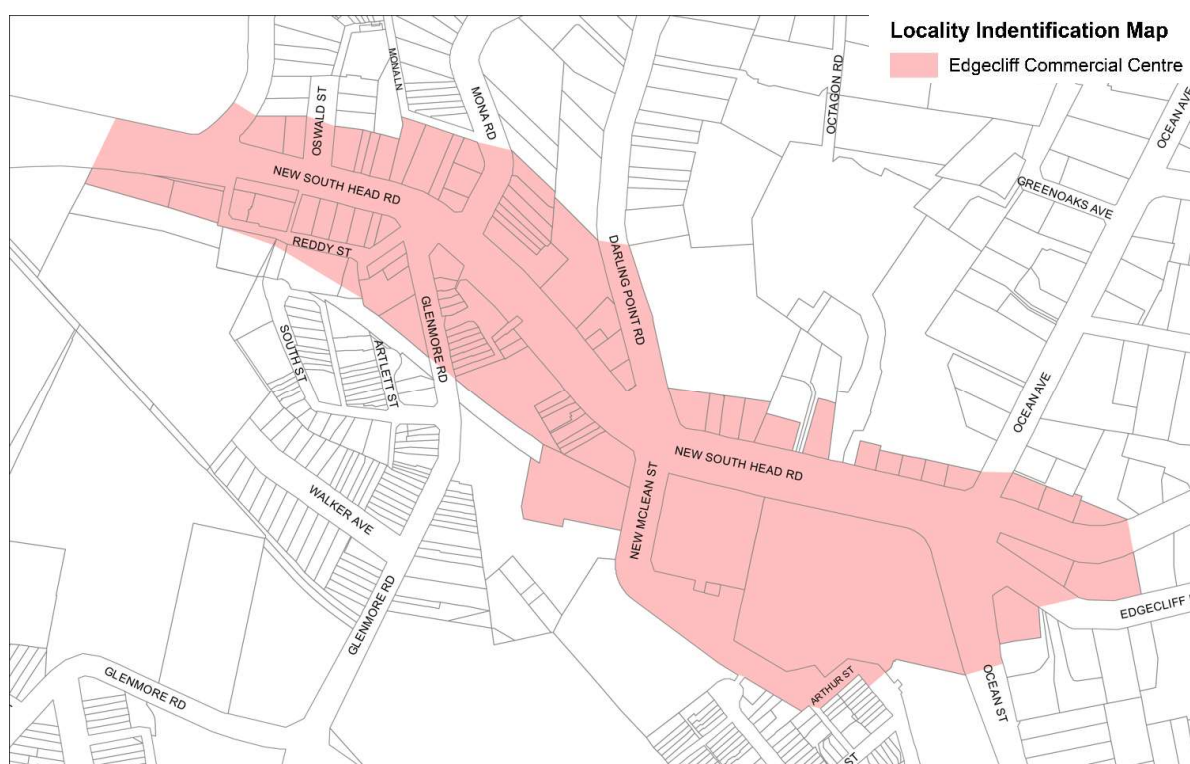


Figure 8: Extract from proposed Woollahra LEP 2014 Local Identification Map (Sheet CL1_003)

8. Community consultation

Public exhibition will be undertaken in accordance with the requirements of the Act and the *Environmental Planning and Assessment Regulation 2021*. It will also have regard to the *Local Environmental Plan Making Guideline* and any conditions of the Gateway determination.

The planning proposal will be exhibited for a minimum of 28 days.

Public notification of the exhibition will comprise:

- Weekly notice in the local newspaper (the Wentworth Courier) for the duration of the exhibition period, when a hardcopy version of that newspaper is being published.
- A notice on Council's website.
- A letter to land owners in the vicinity of each site, which will include every landowner in the ECC.
- Notice to local community, resident and business groups.

During the exhibition period the following material will be available on Council's website and in the customer service area at Woollahra Council offices:

- The planning proposal, in the form approved by the Gateway determination.
- The Gateway determination.
- Information relied upon by the planning proposal (such as relevant Council reports).
- Woollahra LEP 2014.
- Section 9.1 Directions.

The planning proposal is consequential to the ECC Strategy, which was supported by community consultation. The ECC Strategy was on public exhibition from 31 May 2021 to 30 September 2021, to which Council received 134 submissions. The ECC Strategy was amended in response to the community feedback received, with additional studies and information considered by Council.

9. Project timeline

As Council is authorised to exercise the functions of the Minister for Planning under section 3.36 of the EP&A Act 1979, the proposed timeline for completion is as follows:

Plan-making step	Estimated completion
Council Committee consideration	February 2025
Council resolution	February 2025
Gateway determination	June 2025
Government agency consultation	August 2025
Public exhibition period	August 2025
Council assessment of planning proposal post exhibition	October 2025
Council decision to make the LEP amendment	December 2025
Council to liaise with Parliamentary Counsel to prepare LEP amendment	December 2025
Forwarding of LEP amendment to Greater Sydney Commission and Department of Planning, Housing and Infrastructure for notification	December 2025
Notification of the approved LEP	January 2026

Council staff consider the planning proposal to be classed as 'complex' under the *Local Environmental Plan Making Guideline*.

Schedules

Schedule 1 – Consistency with State Environmental Planning Policies (SEPPs)

State environmental planning policy	Comment on consistency
SEPP (Biodiversity and Conservation) 2021	<p>Applicable and consistent.</p> <p>The planning proposal does not contain a provision which is contrary to the operation of this policy.</p>
SEPP (Exempt and Complying Development Codes) 2008	<p>Applicable and consistent.</p> <p>The planning proposal does not contain a provision which is contrary to the operation of this policy.</p>
SEPP (Housing) 2021	<p>Applicable and consistent.</p> <p>The planning proposal does not contain a provision which is contrary to the operation of this policy.</p> <p>The proposed built form controls were modelled and tested against the standards and requirements of the Housing SEPP and the ADG including building separation, building depth and solar access requirements.</p> <p>The proposed built form will ensure that solar access to Trumper Park and Oval, the Paddington HCA and existing dwellings is maintained. At a minimum, development will be required to allow two hours of direct sunlight between 10.00am and 2.00pm on 21 June.</p> <p>Solar analysis indicates that a 26-storey development on the Edgecliff Centre site would not produce excessive overshadowing. Trumper Oval would receive no additional shadowing after 10am in mid-winter.</p> <p>The draft clause for the built form controls contains a provision that prevents bonuses from other environmental planning instruments applying if the site-specific uplift in this document is taken up. This will not permit developers to also utilise affordable housing bonuses under the Housing SEPP. This approach is necessary as the use of both bonuses would create poorer urban design</p>

	outcomes, which would unreasonably affect the amenity of the ECC.
SEPP (Industry and Employment) 2021	Applicable and consistent. The planning proposal does not contain a provision which is contrary to the operation of this policy.
SEPP (Planning Systems) 2021	Applicable and consistent. The planning proposal does not contain a provision which is contrary to the operation of this policy.
SEPP (Precincts – Eastern Harbour City) 2021	Applicable. There are currently no identified state significant precincts located in the Woollahra LGA.
SEPP (Precincts – Central River City) 2021	Not applicable.
SEPP (Precincts – Regional) 2021	Not applicable.
SEPP (Precincts – Western Parkland City) 2021	Not applicable.
SEPP (Primary Production) 2021	Not applicable.
SEPP (Resilience and Hazards) 2021	Applicable and consistent. The planning proposal does not contain a provision which is contrary to the operation of this policy.
SEPP (Resources and Energy) 2021	Applicable and consistent. The planning proposal does not contain a provision which is contrary to the operation of this policy.
SEPP (Sustainable Buildings) 2022	Applicable and consistent. The planning proposal does not contain a provision which is contrary to the operation of this policy.
SEPP (Transport and Infrastructure) 2021	Applicable and consistent. The planning proposal does not contain a provision which is contrary to the operation of this policy.

Schedule 2 – Compliance with section 9.1 directions

Planning proposal – Compliance with section 9.1 directions		
Direction		Applicable/comment
1	Planning systems	
1.1	Implementation of Regional Plans	Applicable. The planning proposal is consistent with the objectives of the <i>Greater Sydney Regional Plan: A Metropolis of Three Cities (2018)</i> , and the relevant priorities and actions of the <i>Eastern City District Plan (2018)</i> as discussed herein.
1.2	Development of Aboriginal Land Council land	Not applicable. This planning proposal does not affect Aboriginal Land Council Land.
1.3	Approval and referral requirements	Any additional approval or referral requirements can be met by this planning proposal in accordance with this direction.
1.4	Site specific provisions	Applicable and consistent. The planning proposal does not contain any unnecessarily restrictive site specific planning controls. A site-specific clause is proposed that enables additional height and floor space, subject to meeting specified amalgamation requirements. The criteria reflects the FSR and height achievable under the recommended amalgamation pattern under the ECC Strategy and is not considered restrictive. The requirement for amalgamation of properties ensures the creation of more efficient, functional and flexible floor plates for future retail, commercial and residential development within the ECC.
1.4A	Exclusion of development standards from Variation	Applicable and consistent. The planning proposal does not contain any provision which is contrary to this direction.
1.5 – 1.22	Implementation Plans	Not applicable. These plans do not apply to the Woollahra LGA.
2	Design and place	
	[This Focus Area was blank when the Directions were made]	

Planning proposal – Compliance with section 9.1 directions		
Direction		Applicable/comment
3	Biodiversity and conservation	
3.1	Conservation zones	Applicable and consistent. The planning proposal will not affect the conservation standards of any environmentally sensitive land.
3.2	Heritage conservation	Applicable and consistent. The planning proposal will not change existing heritage provisions. The proposed changes in built form controls will not have any adverse environmental heritage outcomes, as previously discussed in this document.
3.3	Sydney drinking water catchments	Not applicable. This direction does not apply to the Woollahra LGA.
3.4	Application of C2 and C3 zones and environmental overlays in Far North Coast LEPs	Not applicable. This direction does not apply to the Woollahra LGA.
3.5	Recreation vehicle areas	Not applicable. The planning proposal does not apply to sensitive land or land with significant conservation values. It will not allow land to be developed for a recreation vehicle area.
3.6	Strategic Conservation Planning	Not applicable. The planning proposal does not apply to avoided land or land in a strategic conservation area.
3.7	Public Bushland	Not applicable. This planning proposal will not affect any public bushland.
3.8	Willandra Lakes Region	Not applicable. This direction does not apply to the Woollahra LGA.
3.9	Sydney Harbour Foreshores and Waterways Area	Not applicable. The planning proposal does not apply to land identified within Foreshores and Waterways Area under the <i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i> .
3.10	Water catchment protection	Applicable and consistent. The planning proposal does not contain a provision which is contrary to the objective of this direction.

Planning proposal – Compliance with section 9.1 directions		
Direction		Applicable/comment
4	Resilience and hazards	
4.1	Flooding	<p>Applicable and consistent.</p> <p>Some of the sites identified for uplift are identified as being flood prone in the Woollahra LEP 2014. Council's flood engineer has identified that the flood issues can be mitigated through additional flood protection measures. The needed measures are likely to include a combination of terrain modification, raised thresholds, flood barriers and local drainage augmentation.</p> <p>These issues will be assessed further at development application stage.</p>
4.2	Coastal management	Not applicable. The planning proposal will not affect land in a coastal zone.
4.3	Planning for bushfire protection	Not applicable. The planning proposal will not affect bushfire prone land.
4.4	Remediation of contaminated land	<p>Applicable and consistent.</p> <p>The planning proposal does not contain a provision which is contrary to the objective of this direction.</p>
4.5	Acid sulfate soils	<p>Applicable and consistent.</p> <p>Existing acid sulfate soils provisions will not be altered by the planning proposal.</p>
4.6	Mine subsidence and unstable land	Not applicable. The planning proposal does not apply to land within a proclaimed Mine Subsidence District or to land identified as unstable.
5	Transport and infrastructure	
5.1	Integrating land use and transport	<p>Applicable and consistent. The planning proposal does not contain a provision which is contrary to the aims, objectives and principles of:</p> <ul style="list-style-type: none"> Improving Transport Choice – Guidelines for planning and development (DUAP 2001), and The Right Place for Business and Services – Planning Policy (DUAP 2001).

Planning proposal – Compliance with section 9.1 directions		
Direction		Applicable/comment
5.2	Reserving land for public purposes	The planning proposal does not amend reservations of land for public purposes. The planning proposal is consistent with the direction.
5.3	Development near regulated airport and defence airfields	Applicable and consistent. The planning proposal does not contain a provision which is contrary to this direction.
5.4	Shooting ranges	Not applicable. The planning proposal does not apply to land adjacent to or adjoining an existing shooting range.
6	Housing	
6.1	Residential zones	Not applicable. The planning proposal does not apply to land in a residential zone.
6.2	Caravan parks and manufactured home estates	Not applicable. The planning proposal will not affect any caravan parks or manufactured housing estates.
7	Industry and employment	
7.1	Employment zones	Applicable and consistent. The planning proposal does not remove or alter a business zone and does not reduce the achievable employment floor space in the existing E1 Local Centre zone that applies to subject site. The intended outcome is maintenance or increase in employment floor space on the land the planning proposal applies to.
7.2	Reduction in non-hosted short-term rental accommodation period	Not applicable. This direction does not apply to the Woollahra LGA.
7.3	Commercial and retail development along the Pacific Highway, North Coast	Not applicable. This direction does not apply to the Woollahra LGA.
8	Resources and energy	
8.1	Mining, petroleum production and extractive industries	Not applicable. This planning proposal will not affect any of the nominated activities.
9	Primary production	

Planning proposal – Compliance with section 9.1 directions		
Direction		Applicable/comment
9.1	Rural zones	Not applicable. This planning proposal will not affect any rural zones.
9.2	Rural lands	Not applicable. This planning proposal will not affect any rural lands.
9.3	Oyster aquaculture	Not applicable. This planning proposal will not affect any Priority Oyster Aquaculture Areas.
9.4	Farmland of state and regional significance on the NSW Far North Coast	Not applicable. This direction does not apply to the Woollahra LGA.

Supporting documents (circulated separately)

1. Woollahra Affordable Housing Contributions Scheme – November 2024
2. Woollahra Affordable Housing Contributions Scheme – Report (SGS Economics and Planning) – October 2024