

10 March 2014

Mr Tim Archer
Team Leader Metropolitan Delivery
Growth Planning and Delivery
Planning & Infrastructure
4 -6 Bligh Street
GPO Box 39
SYDNEY NSW 2001

Dear Sir/Madam

Pre Gateway Request – Planning Proposal at 529 – 539 Glenmore Road, Edgecliff

This letter and accompanying documents have been prepared on behalf of Edgecliff Bistro Pty Ltd and comprise a request for Pre-Gateway review of a planning proposal submitted to Woollahra Council (Council) on 7 November 2013.

In short, we do not believe that Woollahra Municipal Council (Council) has given adequate consideration to a genuine proposal to address their inability to contribute to the achievement of the NSW Department of Planning and Infrastructure's (DPI) housing target.

Despite the NSW Department of Planning and Infrastructure's (DPI) housing target for the LGA having been reduced from 2,900 to 2,175, Council acknowledges that current controls provide only 1,300 additional dwellings. While Council's "*Dwelling Opportunity Sites*" study identifies an additional 1,000 potential dwellings, with 464 of these in Edgecliff, 400 of these are within the single Edgecliff Centre project. As this would need to be constructed over an existing shopping centre, bus interchange and railway station, there is considerable risk that these dwellings will never eventuate.

Furthermore Draft Woollahra LEP 2013 fails to implement the recommendations of this study and provides for a total of only 31 additional dwellings across the entire LGA, with none in Edgecliff. This Pre-Gateway review request relates to a proposal to provide a sensible and achievable development option to provide an additional 40 transit oriented dwellings within the Edgecliff Town Centre.

The Planning Proposal seeks to initiate an amendment to the Woollahra Local Environmental Plan 1995 (WLEP 1995) to allow for the future redevelopment of 529 – 539 Glenmore Road, Edgecliff (Lots 27, 28, 29, 30, 31 and 32) for medium density residential development. The intended outcomes of the planning proposal are to:

- Increase the maximum floor space ratio to 6:1;
- Increase the maximum building height for the site of 34 metres; and
- Rezone the site to R3 Medium Density Residential under Draft Woollahra Local Environmental Plan 2013 (DLEP 2013).

Woollahra Municipal Council (Council) voted not to support the Planning Proposal at the Urban Planning Committee Meeting held on Monday 14 February 2014. Therefore we request a Pre-Gateway review of the Planning Proposal by the Department of Planning and Infrastructure.

In addition to this letter, the following information has been provided in this request:

- A completed Pre-Gateway Review application form.
- Disclosure of reportable political donations.
- A copy of the Planning Proposal Report prepared by Urbis dated 7 November 2013 including the Urbis Heritage Impact Statement (Attachment 1).
- A copy of the Indicative Design Concept Analysis prepared by Rothe Lowman dated October 2013 (Attachment 2).
- A copy of correspondence between Council and Urbis during the Council's assessment period. This includes an Addendum to the Planning Proposal prepared by Urbis and dated 23 January 2014 (Attachment 3).
- A copy of Council's Urban Planning Committee Agenda (with annexures) and Minutes for the meeting held Monday 10 February 2014 (Attachment 4).
- An electronic copy of the above documentation (CD).
- The relevant application fee: \$5000

Justification for the Pre-Gateway Review

As per Departmental Guidelines, this review is warranted for the following reasons:

- The Draft East Subregional housing target for Woollahra LGA is 2,900 dwellings by 2031,
- Council acknowledges that only about 1,300 dwellings can be provided under WLEP 1995;
- The Woollahra Council Strategic Planning Team have:

"identified latent capacity in the business and medium density residentially zoned land under the current LEP, and estimate that the existing planning control framework could reasonably yield 1,300 new dwellings if that land is developed to its highest and best potential. However, this means our dwelling capacity has a shortfall of approximately 875 new dwellings."

[Urban Planning Committee Agenda, 11 July 2011]

- While the State Government has required that Draft LEP 2013 accommodate 75% of the housing target (i.e. 2,175 dwellings), and Council's Strategic Planning Team identified 24 "Dwelling Opportunity Sites" to contribute to the attainment of this target during the preparation of DLEP 2013, the exhibited version of DLEP 2013 does not make any tangible provision for the existing 875 dwelling shortfall;
- Council's "Dwelling Opportunity Sites" process identified potential for an additional 1,000 dwellings in the LGA, and recognised Edgecliff as the primary opportunity for increased density.

"Focus increased density on the centres in the Woollahra LGA, especially Edgecliff; and avoid changes to the low density residential areas"

[UPC Agenda, 14 December 2009]

- The Edgecliff Commercial Centre has been identified by Council as being suitable to accommodate 464 new dwellings. This is by far the most significant increase in housing density proposed in the Woollahra LGA, and represents 46.4% of all potential new dwellings identified by the Council's "Dwelling Opportunity Sites" study.
- However 400 of the dwellings predicted in Edgecliff are within the single redevelopment of the Edgecliff Centre, and it is questionable as to whether such density can practicably be realised over an existing train station, shopping centre and bus interchange
- Urbis analysis demonstrates that land within the Edgecliff CBD suitable for residential infill, excluding the Edgecliff Centre, and land unconstrained by strata title and heritage listing, is extremely limited (refer to Section 2.4 of the Urbis Planning Proposal).
- In contrast, the subject site is a regularly proportioned parcel of 722m² under single ownership in the heart of the Edgecliff Town Centre. It is only a 452 metre walk from Edgecliff railway station, which provides a 5 minute rail journey or 12 minute bus journey to the Sydney CBD; and
- The Planning Proposal therefore proposes controls to facilitate a 10 storey residential flat building that could contribute approximately 40 additional dwellings towards the LGA housing target in a manner that would not be inconsistent with the built form context of the Edgecliff Town Centre, and that would help relieve pressure upon the existing character of low density residential areas within the LGA, including the Paddington Conservation Area.
- While the Woollahra Council officer's report questions the indicative design concept in terms of its relationship to the status quo in the immediate vicinity of the site, it fails to give any consideration to the strategic significance of Edgecliff, or what officers may consider to be an appropriate response to the strategic context of the site.
- Furthermore, it emphasises the very low scale of some surrounding development, whilst ignoring the numerous surrounding buildings that are significantly larger than what is proposed.

In view of the above we do not believe that the Council has provided adequate consideration of a genuine proposal to provide additional housing capacity, in accordance with DPI's target.

The proposal is directly consistent with the principles of a range of broader strategic planning considerations contained within the Sydney Metropolitan Plan for Sydney 2036, the draft East Subregional Strategy and the recently released draft Metropolitan Strategy for Sydney to 2031 which support a centres-based approach to managing growth. The site represents a logical location to accommodate new housing opportunities in close proximity to existing services and infrastructure consistent with this approach.

Should you have any queries in respect to this request please do not hesitate to contact the undersigned (02) 8233 9970.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Ian Cady".

Ian Cady
Associate Director - Urban Planning

Enc.: Attachment 1

Planning Proposal Report prepared by Urbis dated 7 November 2013 including the Urbis Heritage Impact Statement

Attachment 2

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Attachment 3

Correspondence between Council and Urbis during the assessment period. This includes an Addendum to the Planning Proposal prepared by Urbis and dated 23 January 2014

Attachment 4

Council's Urban Planning Committee Agenda (with annexures) and Minutes for the meeting held Monday 10 February 2014