

Planning Proposal

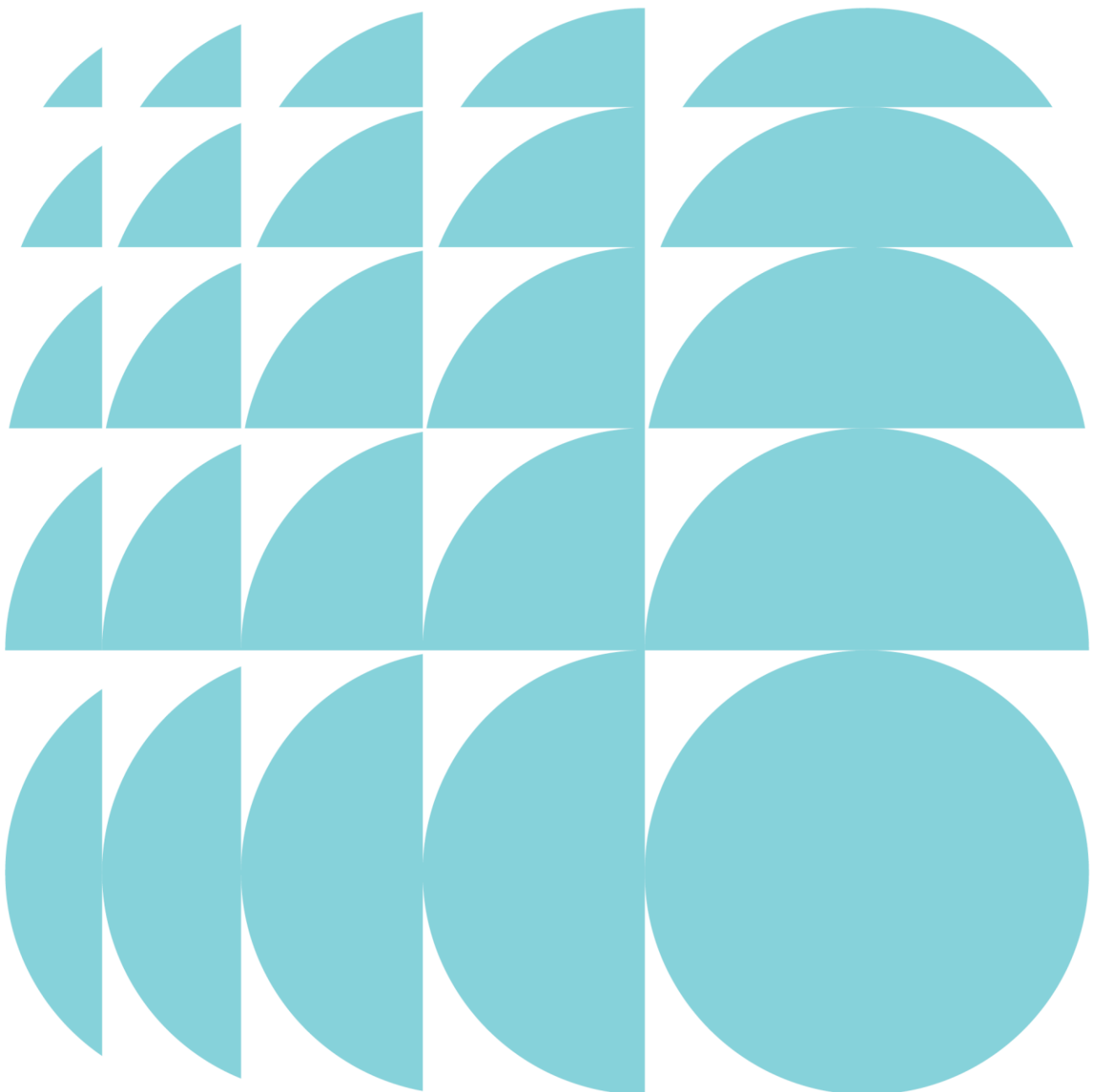
202 – 233 New South Head Road, Edgecliff

Amendments to the Woollahra Local
Environmental Plan 2014

Height of Buildings and Floor Space Ratio
development standards

Submitted to Woollahra Municipal Council
On behalf of Longhurst Group

26 November 2020 | 2190968



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Executive Summary

Purpose of this Report

This Planning Proposal is submitted to Woollahra Municipal Council to request an amendment to the *Woollahra Local Environmental Plan 2014 (Woollahra LEP)* for land at 202-233 New South Head Road, Edgecliff (**the site**). The purpose of this Planning Proposal is to introduce new maximum building height and maximum floor space controls for the site.

The Planning Proposal will facilitate the renewal of the site for a mixed-use development comprising a retail, commercial, medical/wellbeing podium with a residential building that will create a vibrant place for the town centre of Edgecliff. The proposal includes the opportunity to include significant ground plane and public domain improvements, including upgrades to the pedestrian entrances to the adjoining Edgecliff Railway Station, improved intermodal connectivity between the Edgecliff Bus Interchange and the Edgecliff Station, publicly accessible open green spaces and the inclusion of a civic ground floor plaza.

The building will reach RL 195 (being approximately 161-167m above ground level), with 44,190 sqm of floor space. The project is forecast to generate approximately 863 direct jobs during construction and provide for a total of 692 jobs in operation.

The Planning Proposal is prepared in accordance with Section 3.33 of the *Environmental Planning & Assessment Act 1979*, and describes the site, the proposed amendments to the Woollahra LEP and provides an environmental assessment of the proposed height and FSR controls, building envelope and indicative scheme, consistent with the strategic direction of the Edgecliff Centre.

Overview of the Planning Proposal

The objective of this Planning Proposal is to seek the following amendments to the Woollahra LEP:

- Height – Amend the applicable height limit from part 6m and 26m to RL 195m;
- Floor Space Ratio – Amend the applicable Floor Space Ratio (**FSR**) standard from 2.5:1 to 9:1;
- Inclusion of a minimum non-residential FSR of 3:1.

The Planning Proposal is supported by a range of specialist inputs to appropriately address all technical requirements required before LEP Gateway, and to confirm that the site is suitable for the future vision sought.

Background

Woollahra Council conducted an *Opportunity sites* study dated June 2010 which identified 24 opportunity sites within the Woollahra LGA. The purpose of the study was to identify sites capable of accommodating an increased dwelling capacity in order to meet the housing targets set out by the NSW Government in the draft Subregional Strategy in 2010. The study identified Edgecliff Centre as an opportunity site for the following key reasons:

- Increasing density at Edgecliff Centre is consistent with the well-established best planning practice of increasing development potential in centres to promote more sustainable and public transport orientated development.
- A single opportunity site with capacity to support a higher dwelling yield to meet 40% of the housing target and in turn protect lower density residential areas and/or conservation areas from significant change.
- Urban design testing (including overshadowing and view analysis) revealed that the site is capable of accommodating increased height and floor space ratio.

Accordingly, the study recommended an increase in building height to 17 storeys and an increase in floor space ratio to 6.05:1. The study estimated a residential yield of 400 dwellings for the site. The study also highlighted that the existing urban form does not have good amenity, has poor accessibility to transport areas that are in need of upgrading, and that the function of the shopping centre could be greatly improved. While the study was not further progressed, it is prudent to recognise that the site was identified for substantial renewal some 10 years ago given its

key attributes which support renewal of a sustainable and transit-orientated development and renewal of the Edgecliff town centre more broadly. Council have also recently indicated as part of the Pre Application Planning Proposal process that Council support reviewing the planning controls for this site.

The Site

The site is legally described as Lot 203 in DP1113922 and is owned by Longhurst Investments No. 1 Pty Ltd (**Longhurst**). The site is irregular in shape with a site area of 4,910 sqm and is currently occupied by the Edgecliff Centre. The centre comprises of a single seven storey building constructed circa 1970s that is occupied by a range of commercial premises including retail at the lower levels and offices premises above.

The existing building is significantly outdated and is in need of urgent rejuvenation. The existing shopping centre is anchored by a supermarket and specialty retail with a total of approximately 3,154 sqm of retail gross lettable area. Whilst the current centre plays an important role in providing local residents and workers with convenient access to retail facilities, it is insufficient to cater to the projected growth of the region and to service modern tenant or shopper requirements which is evident by the current higher than average vacancies

The Planning Proposal will allow the site to reach its strategic potential and deliver a desirable mix of land uses in a highly accessible location. The site benefits from immediate and direct connectivity to the transport interchange of Edgecliff, which offers significant transport capacity in the local area and offers fast connections to the CBD and wider catchment, including a future connection to the West Metro.

Site Context

The subject site is located in the Edgecliff local centre. The Edgecliff local centre is co-located with the Edgecliff Rail Station, which is part of the Eastern Suburbs Line. The Edgecliff Centre is located just over 2km from the eastern edge of the Sydney CBD (measured from Hyde Park).

Edgecliff Centre is located on New South Head Road, directly west of the Edgecliff Station and Bus Interchange. Edgecliff Station being the second station out of the CBD after Kings Cross Station, is in close proximity to existing schools, a shopping centre, public open spaces, hospitals and medical centres.

The Edgecliff local centre is situated within and at the eastern boundary of a landscape area that stretches from Hyde Park to Edgecliff that has a distinct presence of slender, taller towers. These taller towers are aligned in two main linear corridors. The east-west corridor is aligned with William Street and its extension Old South Head Road, and a complementary north-south spine stretching from the end of Darling Point to the Edgecliff Centre. Taller buildings in these spines are dominated by point towers dating from the 1960s to 1990s that have heights of up to 30 storeys. Given these attributes, Edgecliff Centre is different to the remainder of the Woollahra LGA, which in general has a more suburban character and lower building heights. This is also recognised by the Woollahra Local Strategic Planning Statement (**LSPS**) that identifies Edgecliff as the gateway between the eastern suburbs and the CBD.

Vision

Longhurst has a vision on delivering a high-quality renewal project which will strengthen Edgecliff as the town centre and a gateway that links Sydney's Eastern Suburbs and the Sydney CBD.

The project represents a step-change in the evolution of the Edgecliff Centre as a pre-eminent Local Centre which importantly can deliver on Council's objective of increasing the role of Edgecliff Centre as a key transport interchange (under the LSPS). It also aligns with the State's current strategy of increasing density around existing and planned infrastructure to grow high-value jobs, provide better access to homes and employment, and create liveable and sustainable centres.

This Planning Proposal establishes the planning framework to deliver on this vision for a high-quality, transit orientated development, which will:

- Provide a world class transport interchange and destination at ground level and podium, by leveraging off the site's scale and length of frontage to provide a completely new and invigorated street level outcome, supporting fine-grain activation and permeability;

- Provide open green space and a suite of uses which will galvanise the site as a destination, rather than merely a transport interchange, incorporating fine-grain retail, medical and wellbeing, professional services and leisure and open green space;
- Be of the highest standard of architectural, urban and landscape design, and provide a recognisable and high-quality contribution to the Eastern Suburbs, reinforcing the status of Edgecliff as the Gateway between Central Sydney and the Eastern Suburbs; and
- Deliver a mixture of residential, commercial, retail and medical/well-being floor space to support more efficient access to jobs, services, and homes and contribute to the Greater Sydney Commission's goal of the '30 minute city'.

The project makes the most of the scarce land available in the Edgecliff Centre to deliver employment, retail, medical/wellbeing and residential floor space. It unlocks latent, highly optimal and unconstrained land capable of delivering a mixture of uses and public benefits whilst minimising environmental impacts and not compromising the amenity of the surrounding streets, parks and valued public spaces.

The adjoining Edgecliff Transport Interchange is formed within a stratum ownership arrangement which makes it a highly constrained site to facilitate meaningful improvements or overall redevelopment. In developing the vision for the Edgecliff Centre, the proposal has sought to enable the regeneration of this interchange in a purposeful way to offer significant benefits in improvement of inter-modal connection, station legibility and overall customer experience. The redevelopment of the Edgecliff Centre seeks to provide these improvements within its boundary, utilising land and floor space for improvements to key public infrastructure and the realisation of a town centre.

The Proposal

The amendments to the Woollahra LEP include:

- Increase the maximum FSR on the site from 2.5:1 to 9:1. Within the proposed 9:1 FSR, 3:1 will be dedicated (by way of site-specific provision) to non-residential, employment-generating floor space. It is noted that the residential FSR of 6:1 is similar in magnitude to the FSR recommended in the Woollahra Opportunity Site study and that the additional FSR in this proposal (3:1) is for employment-generating land uses.
- Increase the maximum height on the site from part 26m and 6m to RL 195 (being a height above ground level of approximately 161m).

The proposed amendments in an envelope form was subject to detailed design and environmental impact testing including (but not limited to) urban design testing and visual impact analysis. The indicative design within the preferred envelope can accommodate:

- A 45-storey mixed-use building with a total GFA of 44,190 sqm (FSR of 9:1);
- Eight basement levels with capacity for 301 car spaces;
- Revitalisation and enhancement of the existing intermodal and transport interchange within the site;
- Introduction of potential public community space (subject to further consultation with Council) and a publicly accessible green space at podium level; and
- Public domain improvements at ground level, including a civic plaza.

As the name suggests, the indicative design is indicative only. It has been prepared for the purpose of demonstrating that the proposed building envelope can deliver a viable scheme which complies with the proposed amended planning controls and can fit inside the proposed envelope.

Design Principles

The Planning Proposal and Indicative Development Concept prepared by award-winning Architects FJMT has taken into consideration the development context of the site and its surrounds in order to produce the following key design principles:

- Extend existing street wall and height planes. Any extensions to the street wall height should be sympathetic to the existing street wall. Any extensions above this should be an extension of existing height planes established by Eastpoint tower to the east of the site.
- A new podium and slimmer tower typology is introduced, including a tower element that occupies only 15% of the site area, is setback from the main road, aligning with the existing higher density residential typologies in the vicinity of the site.
- View sharing considerations. Existing views from the residential developments east of the site towards the Sydney CBD and the Harbour Bridge have been considered in the envelope design to respond to view sharing principles.
- Sun access to Trumper Park Oval. The western setback and the angled articulation of the western façade ensures the Oval is not subject to overshadowing from 10:00am mid-winter.
- Site access reconfiguration. The reconfiguration of site access points and extension of activate frontages to support activation on a greater number of frontages.
- Improved integration and permeability to the Edgecliff Railway Station and bus interchange to support a more direct, accessible, and pleasant user experience.

Transport and Green Infrastructure

Edgecliff Centre is approaching the end of its functional life, with degraded internal and external infrastructure contributing to a visual profile that is tired, uninspiring and dysfunctional. The renewal of Edgecliff Centre will involve significant private investment in State and Regional infrastructure in order to provide a world class built form outcome that will deliver improved amenity for the site, including more natural light, greenery and enhanced connectivity to transport infrastructure.

Transport Infrastructure

A fundamental objective of the renewal of the Edgecliff Centre has been to capitalise on the proximate location to the Edgecliff Transport Interchange by providing direct vertical connectivity and enhancing the relationship between the railway station and bus interchange.

The renewal will include provision of a generous 38m wide entryway along New South Head Road, which creates an expansive public plaza at the ground-plane. The proposed entryway will create a well-defined focal point to the transport interchange which in turn creates a place function at the entrance for commuters, shoppers and community members to meet and congregate. Unlike the existing non-descript access point at New South Head Road, the proposed primary access point will be emphasised through appropriate signage and architectural design, providing a clear and intuitive entrance to the transport interchange enhanced by natural light and space.

The proposal also incorporates improvements to the through-site link that connects the primary entrance along New South Head Road to New McLean Street at the rear, therefore affording the site with enhanced pedestrian permeability. In order to deliver the through-site link, parts of the walls separating the Edgecliff Centre site from the adjacent train station access in the East Point Shopping Centre development will be removed. In turn, this fosters unimpeded active movement through the site and provides connections from the residential areas from the north to green spaces such as Trumper Park to the south.

In addition, the site includes a direct connection to the bus interchange from the new development by incorporating vertical connections through a series of escalators. This additional connection to the bus interchange reduces reliance on the non-descript stairs in the Eastpoint Shopping Centre to access bus platforms and provides better integration between the bus interchange and train station. It also provides visual access from the street, by way of large signage and a large atrium indicating that the entry leads to the bus interchange.

Green Infrastructure

The proposal includes the addition of new publicly accessible open green space that will include community spaces and a multi-functional open space adjacent to the bus interchange on the podium level. The park will provide opportunities to gather and congregate within the space directly accessible to and from public transport infrastructure providing an extension to the public realm. Features may include naturally rolling hills across two levels, canopy trees and planting, gardens, hard and soft landscaping, bicycle parking, open spaces for seating, leisure and retreat and varying place making initiatives.

Strategic Justification

The Edgecliff Centre Strategic and Urban Design Study prepared by Ethos Urban provides a strategic planning and urban design analysis to demonstrate that the renewal of the site (under this Planning Proposal) has sufficient strategic merit to proceed to a gateway determination. The study reveals that the role of Edgecliff and Double Bay as a centre is by its features and is potentially able to be elevated higher on the centre's hierarchy given locational attributes and high accessibility to key transport infrastructure. The study finds that:

- Under the *Greater Sydney Region Plan*, Edgecliff is designated as a Local Centre. This type of centre plays an important role in providing access to goods and services close to where people live. Increasing the level of residential development within walking distance of centres with a supermarket is a desirable liveability outcome.
- The *Future Transport 2056 Plan* identifies the importance of transport interchanges as places which will have a high level of accessibility as service frequencies and travel times are improved. On this basis, the *Greater Sydney Region Plan* states that there will be potential for interchanges specifically to deliver mixed-use, walkable, cycle friendly centres and neighbourhoods and that Council's need to consider local conditions through place based planning that provides for centres around interchanges to grow and evolve over time and potentially become strategic centres.
- Under the *Greater Sydney Region Plan*, Bondi Junction is the only Strategic Centre for the northern parts of the Eastern District. Edgecliff is the next level down in the hierarchy and is identified as a Local Centre. It however is larger in footprint and scale than most other local centres and has a number of attributes that suggest it already or has the potential to function as a form of Strategic Centre for that part of the Eastern District closer to the Sydney CBD (Edgecliff is just over 2km from the eastern edge of the Sydney CBD).
- For example, the District Plan notes that centres with a supermarket (Edgecliff contains two) qualify as larger local centres. Support for an elevated role is reinforced by the Woollahra LSPS which designates the centre as a 'key local centre'.
- Under the previous metropolitan plan, Edgecliff and Double Bay combined were designated as a Town Centre, which confers greater significance than that of a local centre. It is conceivable that with the right planning interventions, Edgecliff and Double Bay can be guided to evolve as a more coherent single centre comprising two distinct but related parts. The take up on this rare, larger unconstrained site, directly adjacent to transport infrastructure, supports the further evolution of Edgecliff to cater for a greater proportion of future residents and jobs without interfering with the character of Double Bay.

From a strategic planning perspective, the renewal of Edgecliff Centre aligns with the overall strategic planning framework and satisfies the strategic and site-specific merit test.

Does the proposal have strategic merit?

The proposal is considered to have strategic merit. This is because it is consistent with the applicable strategic planning framework set by the State and by Council. Specifically, the Planning Proposal will facilitate development which:

- Maximises existing infrastructure (the Edgecliff Railway Station) and provides more efficient access to housing, jobs and services to an existing transport hub. It also reduces reliance on vehicle usage and increases daily critical mass to support the viability of goods and services on the site and within the broader Edgecliff Centre;
- Integrated land use and transport creates walkable 30 minute cities. The Planning Proposal provides additional capacity in a location that is in close proximity to jobs, transport, services, and open space, in accordance with the '30 minute city';
- Contributes to the 0-5-year housing target for Woollahra and the housing projections by the GSC up to 2026, and the attainment of the overall housing target for the district which in turn will protect existing lower density residential areas from substantial change; and
- Protects commercial and employment floor space to support the increased role of Edgecliff as a key transport interchange and Centre.

Does the proposal have site-specific merit?

The proposal is considered to demonstrate site-specific merit because:

- It has been subject to a broader environmental assessment. In particular, it has been determined that the existing infrastructure and services on the site (with augmentation) will be capable of supporting the future redevelopment of the site. The proposal also incorporates significant regional infrastructure improvements in terms of the transport upgrades proposed; and
- It has considered environmental values such as views, overshadowing, traffic generation and other impacts as demonstrated in this report, and has been determined to result in an acceptable environmental impact.

The site thereby provides a unique opportunity to deliver significant improvements to the connectivity of the existing intermodal transport connection. This opportunity unlocks the potential for a place based planning approach to the site to accommodate additional employment generating uses, allied medical/wellbeing uses, a diversity of housing product and open space in a highly accessible location. Edgecliff is located within 3km of the Sydney CBD and has been identified in the Woollahra LSPS as *the gateway that links Sydney's Eastern Suburbs and CBD along a vital transit corridor*.

Social and Economic Benefits

The proposal will deliver significant social and economic benefits to the local community as well as broader flow-on benefits within the Sydney metropolitan area.

From an economic perspective, the proposal will support the local economy through the creation of new housing, employment and business opportunities. The project will stimulate local investment and position Edgecliff as a contemporary, activated and well-connected destination that provides a range of essential services and amenities for the community, supporting essential local economic viability, diversity and future growth.

From a social perspective, the amenity and accessibility improvements the proposal will deliver at this critical transport interchange, along with its mix of services, amenities and opportunities for recreation and socialising will serve to strengthen local liveability, community wellbeing and resilience in multiple, tangible ways.

Environmental Assessment

The Planning Proposal provides an environmental assessment of the proposed envelope and an indicative proposal (concept scheme) built to the proposed height and FSR control, providing a summary of the detailed environmental investigations undertaken.

It includes:

- detailed architectural design study;
- strategic and urban design study;
- visual impact assessment;
- traffic and transport assessment;
- rail impact assessment;
- social impact assessment;
- heritage impact assessment;
- wind assessment;
- acoustic and vibration assessment;
- ESD strategy;
- airspace assessment;
- flooding and stormwater assessment;
- contamination / environmental assessment; and
- geotechnical desk study.

Public Benefit

This Planning Proposal report demonstrates the significant public benefit created by the proposal. Whilst the proposal relates to the site, the benefits of the proposal will extend beyond the site's boundaries, importantly contributing to the reinvigoration of the existing bus interchange and railway station, and contributing overall to the reinvigoration of the Edgecliff town centre.

Notable public benefits include:

- A new address and upgraded entry experience linking New South Head Road to the Edgecliff Railway Station and bus interchange which will improve the legibility and permeability of the interchange.
- A new internal circulation and intermodal connection to provide legible and easily accessible pedestrian links through the site to the railway station and adjoining bus interchange.
- Creation of place through new public spaces and landscaping to establish a more attractive destination and town centre. This includes:
 - Attractive fine-grain retail laneway fronting New South Head Road;
 - A new ground floor open plaza and shared public square with further fine-grain retail;
 - New public forum integrating the site to the adjoining bus interchange with a new publicly accessible open space, retail, professional services and medical and well-being uses; and
 - Inclusion of a new through-site link to enhance pedestrian permeability to accommodate a connection between residents to the north and Trumper Park.
- The co-location of residential uses with retail, medical/well-being and commercial uses will support transit-orientated development and contribute to the creation of a walkable centre that provides homes in proximity to employment.
- Support dwelling supply on a strategically positioned site that will enable housing targets to be met while protecting the character of existing residential areas from drastic change. The dwelling supply will also increase the diversity and availability of housing to meet particular demand among higher than average local population of older people, allowing them to downsize and 'age in place' in their much loved LGA.
- Facilitate a mix of uses, including highly accessible health/medical and wellbeing uses that will increase the provision of much needed services necessary to support the growing and changing demographic of the population and support ageing in place.
- Provide the opportunity to create no net increase in traffic movements when compared to current conditions.
- Provide improvements in local amenity and services to the local community and provide better access to these renewed services for the wider community (due to the site's location to transport and the proposed intermodal upgrades).
- Provide the opportunity to improve safe pedestrian crossing across New South Head Road (particularly for students to and from Ascham School).
- Provide the opportunity to improve the pedestrian experience and safety between this strategic site and key public spaces at Trumper Oval and Rushcutters Bay.

Pre Lodgement Consultation and Project Response

This Planning Proposal has been the subject of pre-lodgement consultation with Council and addresses the formal pre-application comments issued by Council on 26 August 2020. Overall, Council have indicated there is general support for a review of the planning controls applicable to the site, but the controls proposed would create development taller and of a scale greater than anticipated.

This issue is addressed in detail within this report and the supporting appendices. The appropriateness of the density put forward is well-founded and is resultant of meticulous design, testing and analysis having regard to the constraints surrounding the site (including in particular view sharing and overshadowing), as well as the physical characteristics of the site (which has no planning constraints), its context to existing transport infrastructure and the overall environmental capacity for an unencumbered site to deliver transit oriented development and density.

In particular:

- The envelope podium comprises three distinct elements (the street wall, the lower podium, and the upper podium) which are a deliberate contextual response to the prevailing street frontage heights and heights of surrounding development along New South Head Road. The street wall height is intended to align with the adjoining Eastpoint frontage heights and the podium heights replicate the existing building heights of 170 and 180 Ocean Avenue.
- The tower element is well setback from the New South Head Road frontage which is consistent with the existing higher density residential typologies in the area whereby buildings are set back from the main street.
- The tower is of a taller, slimmer and narrow form. This is deliberate to:
 - ensure the creation of a taller slimmer tower meaning a skinnier shadow which creates a faster moving shadow for residents to the south, reducing the extent/length of time of shadow caused by the proposal;
 - ensure no overshadowing to Trumper Park Oval between 10:00am and 2:00pm in mid-winter in accordance with the Woollahra Development Control Plan 2015; and
 - effectively consider view sharing principles to the Sydney CBD and Harbour for the existing residential buildings, particularly at 170 and 180 Ocean Avenue. This is also supported by the position of the tower and its proportions on the site. It is positioned on the southern end of the site at an angle and in order to minimise its elevation length in the western view.
- The bulk and scale proposed does not affect surrounding residential receivers from achieving appropriate residential amenity in accordance with the Apartment Design Guide.
- The site is the only remaining large and unconstrained portion of land in the Edgecliff Centre corridor. It also sits above and adjacent to the only transport interchange in Woollahra, in a setting which has a very different character to the remainder of the LGA and which is capable of accommodating density without impinging on lower density residential and/or conservation areas.
- The unconstrained nature of the site represents an opportunity to deliver density without affecting the established residential character of the remainder of the LGA and can create a genuine transit orientated development.

Overall, the proposal represents a fundamental shift away from the setting of a generic fixed FSR and height control for town centre LEP maps, which is in isolation of site and locality-specific environmental context and impacts. The site specific consideration of the density that can be accommodated on the site, recognises the unconstrained nature of the site, being a large and unrestricted lot in the heart of Edgecliff above the Edgecliff Railway Station and directly adjoining the Edgecliff bus interchange. It also responds to the environmental capacity of the site in terms of overshadowing, traffic generation and other environmental impacts. This has then derived an appropriate height and FSR for the site.

Conclusion

The proposed amendments to the Woollahra LEP will allow the site to reach its strategic potential and contribute significantly to the local public domain and provide broader regional benefits in terms of the transport upgrades proposed. The site benefits from immediate and direct connectivity to Edgecliff Station and Edgecliff Bus Interchange which offers significant uplift in transport capacity in the local area and offers fast connections to a wider catchment.

To this end, the Planning Proposal and the indicative development concept for the site fosters the principles of transit-orientated development, whilst generating significant benefits and opportunities for Woollahra LGA and the Edgecliff town centre.

Accordingly, considering the proposal and the overall strategic nature of the site and justification provided in addressing planning issues, the Planning Proposal is considered to have strategic merit. This Planning Proposal also demonstrates that the density proposed can be appropriately accommodated on the site while also minimising environmental impacts and not compromising the amenity of surrounding residential receivers, heritage and valued public spaces. This supports the site-specific merit of the Planning Proposal.

For these reasons and the ones set out below, we have no hesitation in recommending this Planning Proposal for Gateway Determination.

- The proposal is by and large consistent with the overall strategic planning framework for the site;
- The development concept is fully aligned with Transit Oriented Development in that the planning proposal will facilitate the rejuvenation of Edgecliff, creating a vibrant mixed use town centre as the gateway to the Eastern City District;
- Provision of employment-generating floor space to accommodate a variety of uses including specialty retail and community, leisure, and medical/well-being facilities, to create additional job opportunities to meet the employment targets for the Eastern City District;
- Provision of housing within immediately adjacent to the Edgecliff station and in close proximity to the largest employment area being the Sydney CBD;
- Provision of housing that meets a demographic need in terms of downsizing and ageing in place in a higher accessible and desirable location;
- The proposal will deliver significant economic benefits to the locality and broader region, including the creation of 2,600 jobs across the broader supply chain and an industry value-added of \$66m to regional domestic product which will contribute to meeting the demand for retail floorspace without compromising to the viability of surrounding centres; and
- The proposal will deliver a range of social benefits including new public open space, new community spaces, new highly accessible curated medical/wellbeing offering and significant upgrades to the existing Edgecliff Station entry and intermodal connections to the adjoining bus interchange and new pedestrianised public domain spaces.

1.0 Introduction

This Planning Proposal Report is submitted to Woollahra Municipal Council (**Council**) in relation to proposed amendments to the *Woollahra Local Environmental Plan 2014 (Woollahra LEP)* for land at 203-233 New South Head Road, Edgecliff (commonly known as the Edgecliff Centre (**the site**)). Ethos Urban has prepared this Planning Proposal Report on behalf of Longhurst Investments No. 1 Pty Ltd (**Longhurst**).

The purpose of the Planning Proposal is to amend the existing Height of Buildings and Floor Space Ratio (**FSR**) development standards applicable for the site, in order to facilitate a fully integrated, mixed-use transit-orientated development for the site.

It is intended to accommodate the renewal of Edgecliff Centre for a mixed-use transit orientated development comprising retail, medical/well-being and office uses and a residential building up to a height of RL 195 (161-167m), with an overall Gross Floor Area (**GFA**) of approximately 44,190sqm. The proposal will create a vibrant place for the centre of Edgecliff as well as leveraging and improving the existing public transport infrastructure which is a key objective of the Planning Proposal.

The proposal will include opportunities for significant ground plane and public domain improvements, including upgrade of the pedestrian entrances to the adjoining Edgecliff Station, improved intermodal connectivity between the bus interchange and the rail station, community spaces, civic plaza and publicly accessible open green spaces. An indicative development concept has been prepared by FJMT with guidance from a multifaceted consultant team including Ethos Urban, ARUP, Aurecon, GMU, Curio, Cred Consulting and Richard Lamb and Associates.

Specifically, the Planning Proposal seeks to increase the Height of Buildings development standard applicable to the site from part 6m and 26m to RL195, and increase the maximum FSR from 2.5:1 to 9:1. The FSR proposed will include a minimum 3:1 of non-residential floor space component. Amendments to the Woollahra Development Control Plan 2015 (**Woollahra DCP**) will be required to support this outcome.

As required by Section 3.33 of the *Environmental Planning and Assessment Act 1979 (EP&A Act)*, this Planning Proposal will include:

- a statement of the objectives or intended outcomes of the proposed instrument;
- an explanation of the provisions that are to be included in the proposed instrument;
- the justification for those objectives, outcomes and provisions and the process for their implementation (including whether the proposed instrument will comply with relevant directions under section 9.1 of the EP&A Act); and
- details of existing and proposed community consultation.

This Planning Proposal Report describes the site, the proposed amendments to the Woollahra LEP and DCP and provides an environmental assessment of the proposed height and FSR controls, building envelope and indicative concept design. The report should be read in conjunction with the Design Report prepared by FJMT (**Appendix A**) and the accompanying specialist consultant reports (refer to Table of Contents).

The Planning Proposal has been prepared with regard to '*A guide to preparing planning proposals*' published by the Department of Planning, Industry and Environment (**DPIE**). It also includes a response to the formal comments issued by Council during pre-lodgement consultation with Council. Refer to **Appendix D**.

1.1 Vision and Background

The site has been considered an opportunity site for over a decade (given it has already been identified by Council as an Opportunity Site as far back as 2010). The site provides a large, consolidated area for renewal and is strategically positioned above an existing rail corridor and adjacent to a bus interchange.

The existing connectivity and interface to Edgecliff Station and Edgecliff Bus Interchange is poorly connected and is overdue for vast improvement. This is despite recent TfNSW investment in lift / DDA upgrades to the platform and station interface. However, due to the current ownership structure there is a limited ability to make large-scale improvements on the station site itself.

The Edgecliff Centre site thereby provides a unique opportunity to deliver significant enhancements to the connectivity of the existing intermodal transport connection and improve the interchange's ability to provide a modernised and delightful customer experience. This opportunity unlocks the potential for a place-based and transit orientated planning approach to the site to accommodate additional employment-generating uses, allied medical/well-being uses, a diversity of housing product and open space in a highly accessible location. Edgecliff is located within 3km of the Sydney CBD and has been identified in the Woollahra LSPS as the gateway that links Sydney's Eastern Suburbs and CBD along a vital transit corridor.

A mixed-use development that harnesses the site's prime location above Edgecliff Railway Station and adjacent to the Edgecliff Bus Interchange to deliver substantial employment and residential floor space, as well as public domain additions, can raise the status of Edgecliff as a centre. The Woollahra LSPS identifies Edgecliff and Double Bay as key local centres.

This Planning Proposal establishes the planning framework to deliver on this vision for a pre-eminent mixed-use transit orientated development in Edgecliff, which will:

- Provide a world class transport interchange and destination at ground level, by leveraging off the site's scale and length of frontage to provide a completely new and invigorated street level outcome, supporting fine-grain activation and pedestrian permeability;
- Provide open space which will galvanise the site as a destination, rather than merely a transport interchange, incorporating fine-grain retail, plaza areas and open green space;
- Be of the highest standard of architectural, urban and landscape design, and provide a recognisable and high-quality contribution to the Eastern Suburbs skyline, reinforcing the status of Edgecliff as the Gateway between Central Sydney and the Eastern Suburbs; and
- Deliver a mixture of residential, commercial, retail and medical/well-being floor space to support more efficient access to jobs, services, and home.

1.2 Pre-lodgement Consultation with Council

A pre-lodgement meeting was held with Council on 24 July 2020. The formal pre-application comments are provided at **Appendix C**. Each comment has been addressed throughout this report and within a response matrix at **Appendix D**.

Council have indicated there is general support for a review of the planning controls applicable to the site, but the controls proposed would create development taller and of a scale greater than anticipated. The appropriateness of the density put forward in this Planning Proposal is therefore justified in greater detail in this document, is well-founded and is the result of meticulous design, testing and analysis having regard to the constraints surrounding the site (including in particular view sharing and overshadowing), as well as the physical characteristics of the site, as well as considering its context and proximity to existing transport infrastructure.

2.0 Site Context and Description

2.1 Site Context

The site is located at 203-233 New South Head Road, Edgecliff within the Woollahra Local Government Area (LGA). Edgecliff is a suburb and local centre situated in the eastern suburbs of Sydney, positioned three kilometres east of the Sydney CBD (refer to **Figure 1**). Surrounding local centres bounding the suburb include Darling Point to the north, Double Bay to the east, Paddington to the south and Rushcutters Bay to the west.

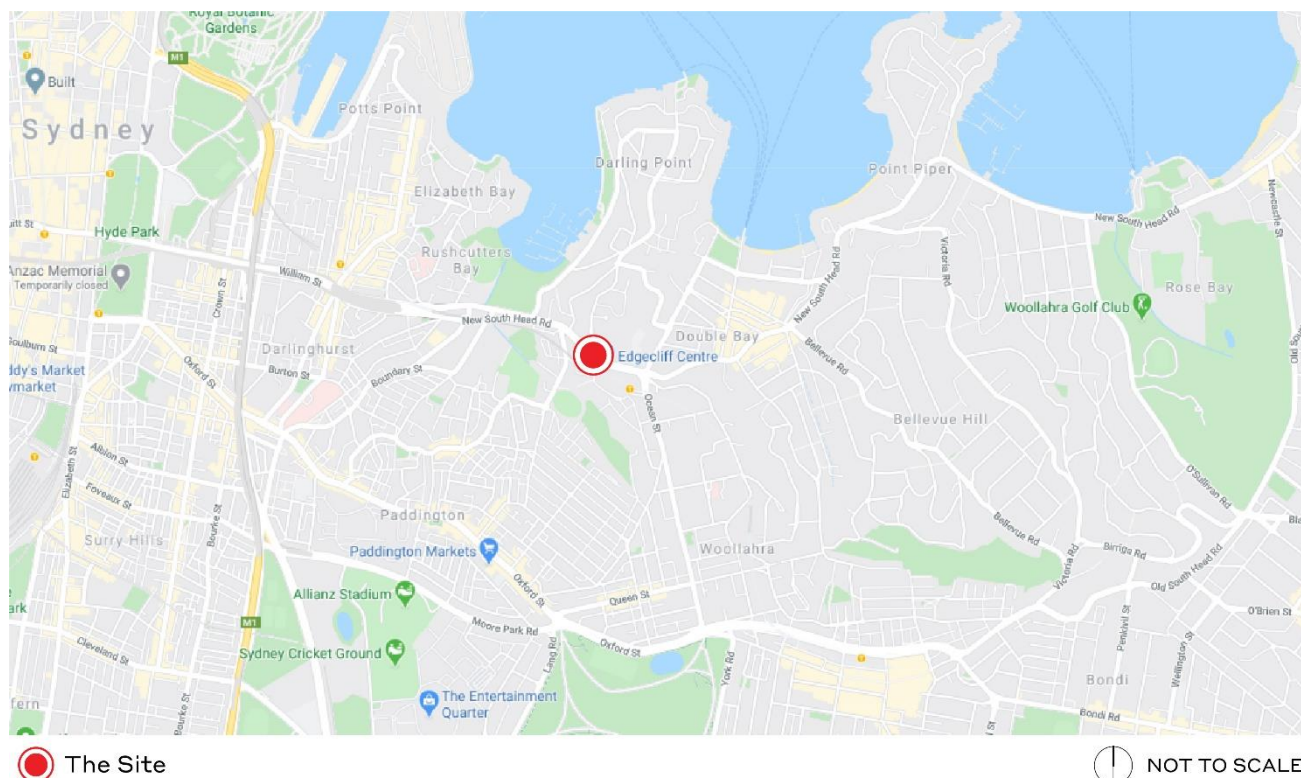


Figure 1 – Site context

Source: Google Maps & Ethos Urban

2.2 Site Description

The site is legally described as Lot 203 in DP1113922 and Lot 5 DP243380 and is owned by Longhurst Investments No. 1 Pty Ltd. The site is irregular in shape with a site area of 4,910 sqm. It has the following frontages (approximately):

- 70 metres along New South Head Road;
- 62.1 metres along New Mclean Street (south); and
- 64.25 metres along New Mclean Street (west).

The northern portion of the site contains a below ground easement to service the existing Eastern Suburbs railway line, with an unlimited depth and a height limited to RL 27.455 (which is existing ground level). A Survey Plan accompanies the Planning Proposal at **Appendix B**. Aerial photos of the site are provided at **Figure 2**.



Figure 2 – Site Aerial
Source: Nearmaps & Ethos Urban

2.3 Existing Development

The site is currently occupied by the Edgecliff Centre. The centre comprises a single seven storey building dating from the 1970s that is occupied by a range of commercial premises including retail at the ground, street front level and offices premises above. The existing development is shown in **Figure 3** to **Figure 6**.

The site is positioned adjacent to two train station entries, with one situated to the east of the site's northern frontage at New South Head Road and the other to the east of the site's southern frontage at New McLean Street. Both these train station entrances relative to the site are illustrated in **Figure 5** and **Figure 6** below. The bus interchange adjoins the site and is situated above the Eastpoint Shopping Centre development. The site does not include any direct vertical connections to the railway below or the bus interchange above.



Figure 3 – Edgecliff Centre, viewed from north west



Figure 4 – Edgecliff Centre, viewed from the north



Figure 5 – Edgecliff railway station entrance adjoining the site to the east on New South Head Road



Figure 6 – Rear of the site adjoining the entrance to Edgecliff railway station

2.4 Surrounding Development

The site is located in the Edgecliff local centre which broadly contains a mix of commercial, retail, entertainment, and residential uses. This is within a broad built form typology which ranges from one to over thirty-nine storeys which creates a varied hierarchy of height and density. More specifically, the site is surrounded by the following development.

2.4.1 To the North

On the northern edge of New South Head Road, opposite the site, there are a number of mixed use and residential developments of a medium density, ranging from two to four storeys. Further north, on Darling Point Road, there are some high-density residential developments including the 32 storey Ranelagh development, located 100m north of the site and 51 Darling Point Road, which is 14 storeys and situated 300m north of the site.



Figure 7 – New South Head Road facing east, showing development to the north including Ranelagh



Figure 8 – Development directly north of the site on the opposite side of New South Head Road

2.4.2 To the South

To the immediate south of the site, development is predominantly characterised as higher density residential. These developments along the southern edge of New McLean Street are part three and part four storey residential flat building developments (see **Figure 9** and **Figure 10**). Further south, on Cameron Street and Bowes Avenue, development is typically of a two-storey terrace typology.



Figure 9 – Part three and part four storey residential flat building development directly south west of the site on New McLean Street

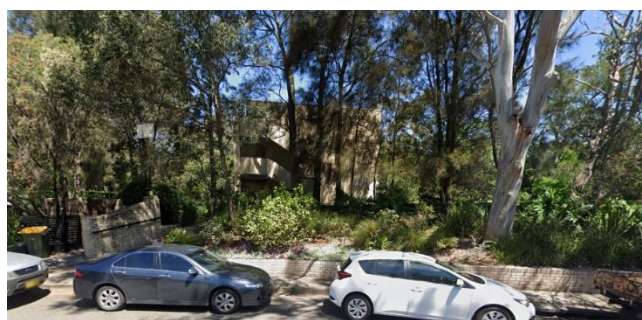


Figure 10 – Part three and part four storey residential flat building development directly south of the site on New McLean Street

2.4.3 To the East

Directly adjoining the site to the east is the Eastpoint Shopping Centre development which is located above the Edgecliff railway station and comprises a two-storey frontage along New South Head Road. Further to the east, at the junction of New South Head Road and Ocean Street and on Ocean Street, are Eastpoint Tower and Oceanpoint 170, respectively 16 storeys and eight storeys.



Figure 11 – Eastpoint Shopping Centre, which adjoins the site to the east



Figure 12 – Eastpoint Tower, looking west from Ocean Street

2.4.4 To the West

Immediately west of the site, on the opposite edge of New McLean Street, development is characterised as mixed use and this continues further west along New South Head Road. The density of these developments' ranges from two to ten storeys and is generally mixed use.



Figure 13 – Mixed use developments on the western side of New McLean Street, directly opposite the site



Figure 14 – Ten storey mixed use development on New South Head Road to the west of the site

More broadly, development along the Darling Point Peninsula is varied with a sporadic array of medium and high density developments (refer to **Figure 15**).

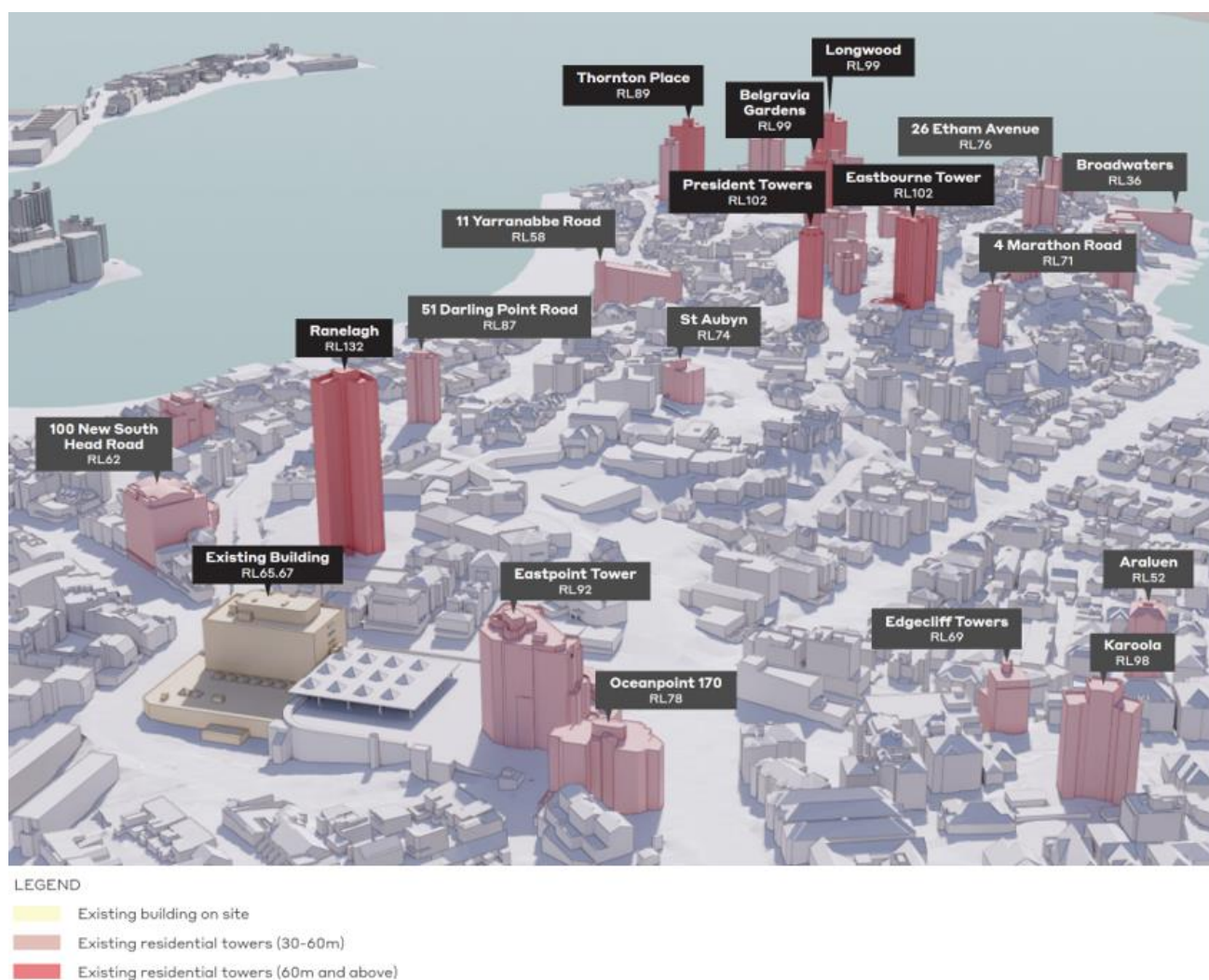


Figure 15 – Surrounding development along the Darling Point Peninsula

Source: Ethos Urban

2.5 Transport and Access

The site benefits from convenient public transport, being located adjacent to the Edgecliff railway and bus interchange. This connects the site with direct railway services to the Sutherland Shire and the Sydney CBD. The bus services at the bus interchange provide important connections to the Sydney CBD, the Lower North Shore and the Eastern Suburbs. Key bus connections from the Edgecliff bus interchange include:

- a five-minute connection to the Sydney CBD;
- an eight-minute connection to Bondi Junction; and
- a 10-minute connection to St Vincent's Hospital.

Vehicular access for public vehicles is provided to the west of the existing development via New McLean Street (see **Figure 16**), leading to one level of car parking. Egress for these vehicles is located at the south of the site on New McLean Street. Access to a tenant car park is also located to the south of the site, adjacent to the general car park exit and an additional loading vehicle entrances is located at the south-eastern corner of the site.

The majority of pedestrian entrances to Edgecliff Centre are located on New South Head Road, with one located on the north-western corner of New McLean Street.



Figure 16 – Vehicular access to the site along the western frontage via New McLean Street



Figure 17 – Vehicular access to the site along the southern frontage of New McLean Street

2.6 Heritage

The site does not consist of any heritage significant items, nor is it within a heritage conservation area. However, it is located in the vicinity of the 'Paddington, including parts of Woollahra and Edgecliff' heritage conservation area. This heritage conservation area is situated to the south of the site, on the opposite edge of New McLean Street. The closest heritage items are located on the northern edge of New South Head Road, directly opposite the site and include the following:

- 136 New South Head Road (opposite the site) – building and interiors;
- 188 New South Head Road (opposite the site) – Ascham school precinct; and
- Darling Point Road, near intersection with New South Head Road – Concrete balustrade.

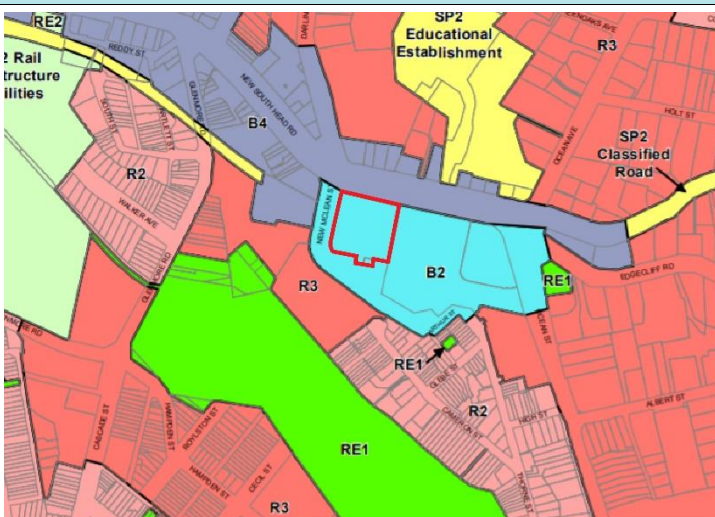
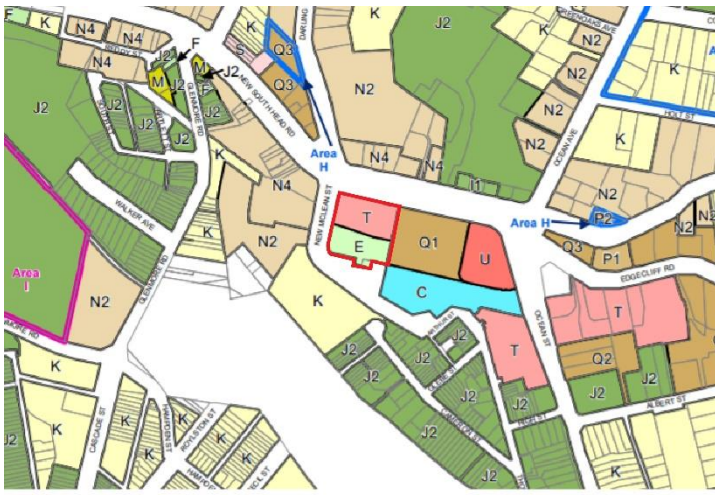
The site is also located above the subterranean Eastern Suburbs Railway and Edgecliff Railway Station which listed under Sydney's Trains Section 170 Register.

3.0 Current Statutory Planning Framework

3.1 Woollahra Local Environmental Plan 2014 (Woollahra LEP)

The Woollahra LEP is the principal environmental planning instrument applying to the site. Key provisions applicable to the site are identified in **Table 1**.

Table 1 – Summary of current Woollahra LEP Controls

Controls	Provision	Woollahra LEP Mapping
Clause 2.2 Zoning	The site is zoned B2 Local Centre under the Woollahra LEP. The proposed mix of land uses will include commercial office, retail, medical and shop top housing which are all permissible with development consent.	 Zones B2 Local Centre R3 Medium Density Residential RE1 Public Recreation B4 Mixed Use SP2 Infrastructure R2 Low Density Residential RE2 Private Recreation The Site NOT TO SCALE
Clause 4.3 Height of Buildings	Maximum height of buildings: Part 26m (fronting New South Head Road) and part 6m (fronting New McLean Street).	 Maximum Building Height C 5m E 6m F 6.5m H 8m J2 9.5m K 10.5m M 12m N2 13.5m N4 14.5m P1 17.5m P2 18m Q1 19m Q2 19.5m Q3 20.5m S 20.5m T 26m U 34m The Site NOT TO SCALE

Controls	Provision	Woollahra LEP Mapping
Clause 4.4 Floor Space Ratio (FSR)	Maximum FSR: 2.5:1.	
Clause 5.10 Heritage conservation	The site is not listed as a heritage item, nor is it located within a heritage conservation area under the Woollahra LEP. However, it is in the vicinity of a heritage conservation area and a number of heritage items, including: - Heritage conservation area C8 – Paddington, including parts of Woollahra and Edgecliff heritage conservation area; 136 New South Head Road (opposite the site) – building and interiors; 188 New South Head Road (opposite the site) – Ascham school precinct; and - Darling Point Road, near intersection with New South Head Road – Concrete balustrade.	

3.2 Woollahra Development Control Plan 2014 (Woollahra DCP)

The Woollahra DCP builds upon the Woollahra LEP and provides more fine-grain design and development controls applicable to the site. The site is located on land within the Edgecliff Centre (Refer to **Figure 18**) which is subject to a precinct specific DCP (Chapter D4 of Part D).

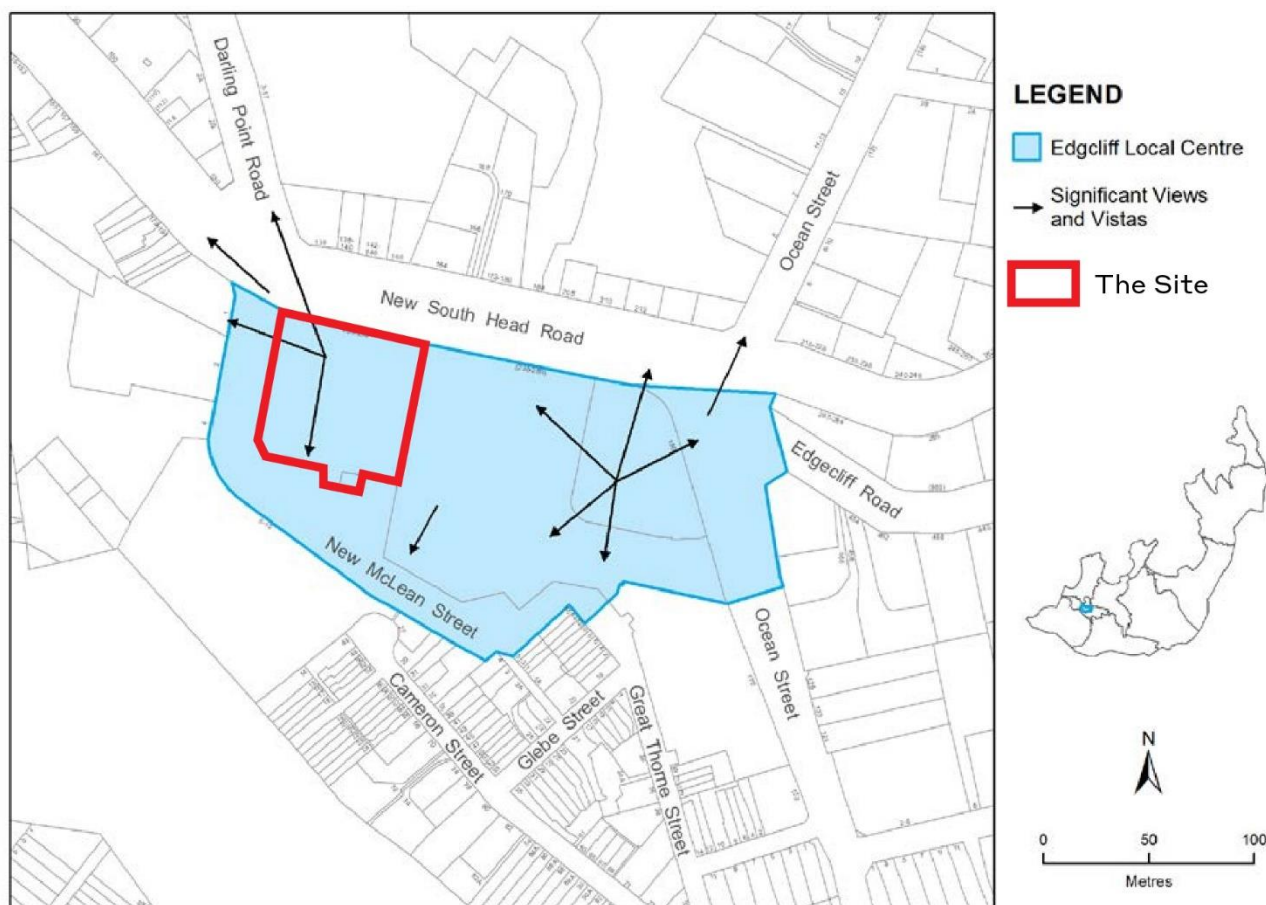


Figure 18 – Edgecliff Centre

Source: Chapter D4 (Edgecliff Centre) of Part D (Business Centres) of the Woollahra DCP

3.2.1 Desired future character for the Edgecliff Centre

The DCP envisages that the development within Edgecliff Centre is to contribute to the following desired future character:

- Reinforce the role of Edgecliff Centre as the *focus of retail and business activity and continue to be convenient place for people to meet, work, shop and use services.*
- *The built form will promote an urban environment which meets high standards of visual quality and pedestrian amenity.*
- *Buildings will be up to eight storeys on New South Head Road and transition down to one to two storeys at New McLean Street frontage. At the corner of Ocean Street and New South Head Road buildings up to 10 storeys are permitted.*
- *New McLean Street will have an active street frontage and parking and servicing arrangements will be reconfigured to be less visually intrusive. The amenity will be improved by including streetscape works, landscaping and reducing the frontage dedicated to vehicle movements.*
- *Pedestrian links across the centre, and through the centre to the bus interchange and railway station, will be enhanced. The connections to the surrounding New South Road commercial corridor and nearby residential land will increase pedestrian activity and convenience. Where commercial development addresses a street, awnings will be provided at street level for weather protection.*
- *Given the excellent public transport access, the centre is ideally located for increased residential and commercial land uses. Retailing, medical and health related services and professional services will continue to cater for the needs of the local community.*

3.2.2 Development controls

Key development controls applicable to the redevelopment of the site include the following.

- C1 The ground floor of the building on New South Head Road is setback 3m.*
- C2 The building at 203-233 New South Head Road Addresses New McLean Street, is related to the scale of pedestrians and provides visual interest. This may be achieved by:
 - a) providing an active frontage to New McLean Street;*
 - b) reconfiguring the parking and servicing arrangements so these do not dominate the streetscape; and*
 - c) reducing the number and width of vehicle cross overs.**
- C3 The design of the lower part of the street façade relates to the scale of pedestrians.*
- C12 The permeability and connectivity of the centre is improved. For example, by providing north-south thoroughfares and improving links between the retailing spaces and the public transport facilities.*
- C18 Development provides an active frontage to New South Head Road, New McLean Street and Arthur Street.*
- C27 Solar access to the Trumper Park Oval is provided between the hours of 10am and 2pm on 21 June. Where existing overshadowing is greater than this, sunlight is not to be further reduced.*

Assessment of these controls is provided in **Section 6**.

4.0 Indicative Development Concept

4.1 Vision

The vision for the site is to create a revitalised and vibrant transit-orientated development that enhances intermodal transport connectivity and legibility, provides essential services, increases the provision of housing close to transport and accommodates the provision of employment generating uses. The renewal will also provide essential retail, medical, health and wellbeing services, and has the potential to provide a new community space and a publicly accessible open green space and plaza areas that will benefit the broader community. This will enable the creation of a vibrant and rejuvenated town centre that fosters an attractive and accessible place to live, work and play.

The renewal provides a unique opportunity to make significant improvements to the public domain, transport infrastructure and provide new open space areas to develop a new mixed-use community that establishes a true focal point of activity for the centre of Edgecliff.

The new residential population will stimulate businesses and retail outlets in the centre of Edgecliff. Mixed uses along with modernised office space and allied medical/well-being uses will increase opportunities for residents to work locally and use local retail and leisure facilities. It is envisaged that the ground plane will accommodate uses such as dining and retail shopping facilities to promote activation in an open plaza type service offering, whilst facilitating an important connection for the inter-modal nature of the centre. It is anticipated that the space can be curated to enhance its ability to be a place to meet, congregate and connect with place-making initiatives for the community and town centre.

Redevelopment at the Edgecliff Centre offers the opportunity for the potential of public benefits such as a publicly accessible open green space and community space which will be integrated on the podium level of the bus interchange that will increase amenity for new residents, workers and commuters, and will foster the growth of a community choosing to stay and use the space and not simply commute. The inclusion of new pedestrian links will increase permeability and allow better activation and connectivity to key nodes within and surrounding the precinct.

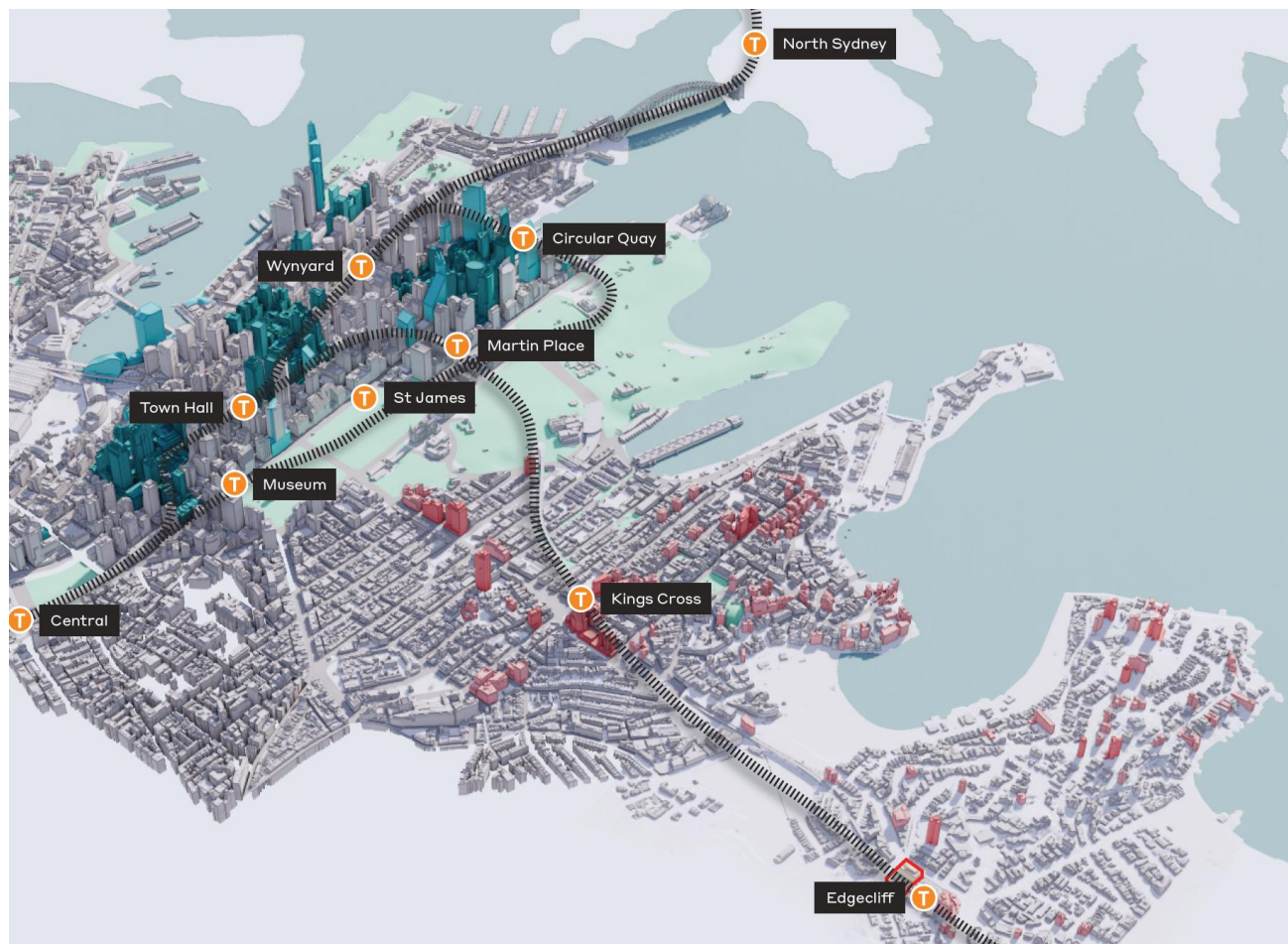
The design of the indicative scheme for the site considers views from adjoining residential development and strategically locates the building form in a way that considers view sharing. The siting of the building form also protects solar access to Trumper Park during required DCP hours and seeks to minimise overshadowing impacts on adjoining residential properties.

The scale of the proposed built form comprises of a podium base and a slender tower that will define the transport interchange and town centre of Edgecliff. This is generally configured to concentrate density around the station and bus interchange in accordance with local and State strategic planning policies and to protect the amenity of existing natural features, public open space areas and the character of existing lower density residential areas.

4.2 Urban Design Analysis

An Urban Design Study prepared by Ethos Urban and a future desired character study prepared by GMU is submitted with the Planning Proposal and provides a contextual analysis of the site and surrounding area. Based on this, the following key considerations have informed the indicative development concept and Planning Proposal:

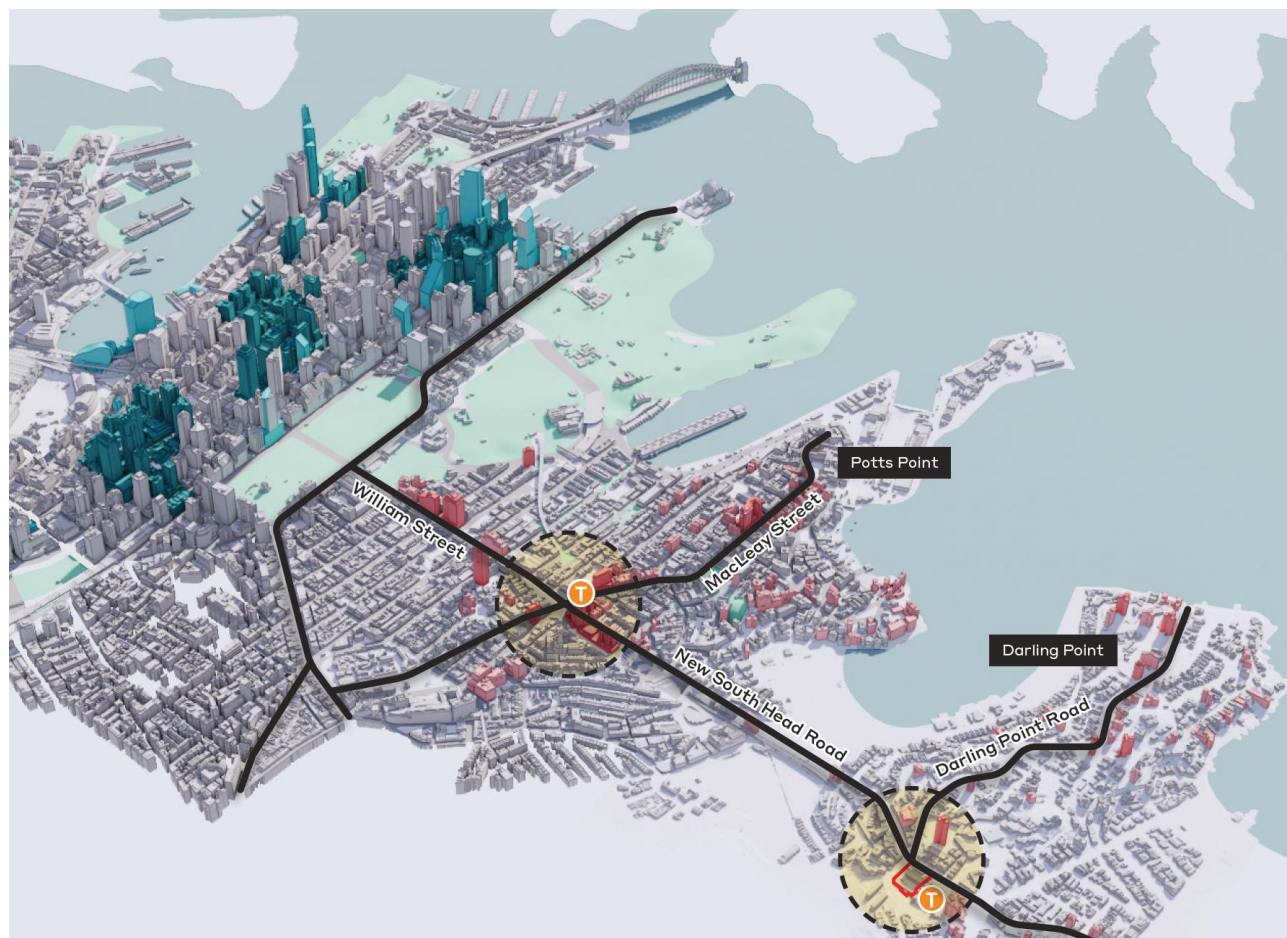
- Height around stations. The amenity and efficiencies associated with these public transport nodes supports buildings with greater heights and densities (refer to **Figure 19**).
- Heights along ridge roads. The site's along two main linear corridors which contain a number of taller tower forms which sit along ridge roads (William Street and New South Head Road, and Darling Point Road) (refer to **Figure 20**).
- Higher density clusters and activity centres. Throughout Sydney, activity centres have formed along ridge roads containing retail high streets and higher density clusters (refer to **Figure 21**).



-  Existing building on site
-  Existing buildings
-  Tower clusters identified in the Draft CSPS
-  Existing towers (approx. 30-60m)
-  Existing towers (approx. 60m and above)
-  Train stations
-  Train lines

Figure 19 – Heights near train stations

Source: Ethos Urban



- Existing building on site
- Existing buildings
- Tower clusters identified in the Draft CSPA
- Existing towers (approx. 30-60m)
- Existing towers (approx. 60m and above)
- T Train stations
- Ridge roads
- Intersection/termination of ridge lines

Figure 20 – Heights along ridge roads

Source: Ethos Urban



Figure 21 – Higher density clusters (identified in yellow) and activity centres (identified in orange)

Source: Ethos Urban

4.3 Design Principles

The Planning Proposal and Indicative Development Concept prepared by award-winning Architects FJMT has taken into consideration the development context of the site and its surrounds in order to produce the following key design principles:

- Extend existing street wall and height planes. Any extensions to the street wall height should be sympathetic to the existing street wall. Any extensions above this should be an extension of existing height planes established by Eastpoint tower to the east of the site.
- A new podium- and slimmer tower typology is introduced, including a tower element that is setback from the main road, aligning with the existing higher density residential typologies in the vicinity of the site.
- View sharing considerations. Existing views from the residential developments east of the site towards the Sydney CBD and the Harbour Bridge have been considered in the envelope design to respond to view sharing principles.

In addition to the above, the following design moves relating to the ground plane have also shaped the Planning Proposal and indicative scheme:

- Site access reconfiguration. The reconfiguration of site access points to support activation on a greater number of frontages (refer to **Figure 22**).
- Improved integration and permeability to the Edgecliff Railway Station and bus interchange to support a more direct, accessible, and pleasant user experience (refer to **Figure 22**).
- Extension of active frontages. Currently, only the New South Head Road frontage is active, with the southern and western frontages supporting predominantly vehicle access and loading (refer to **Figure 23**).

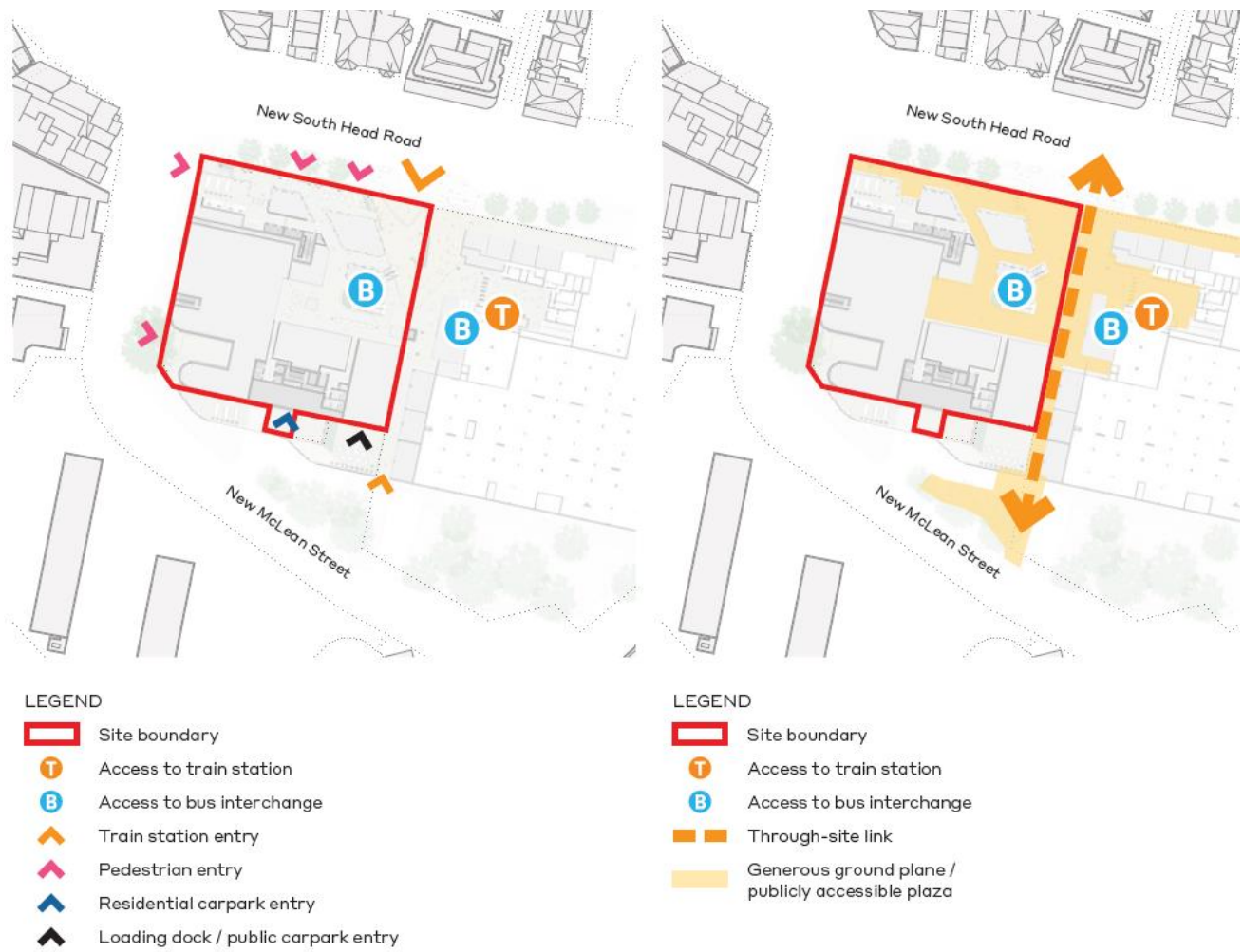


Figure 22 – Reconfigured site access and permeability

Source: Ethos Urban

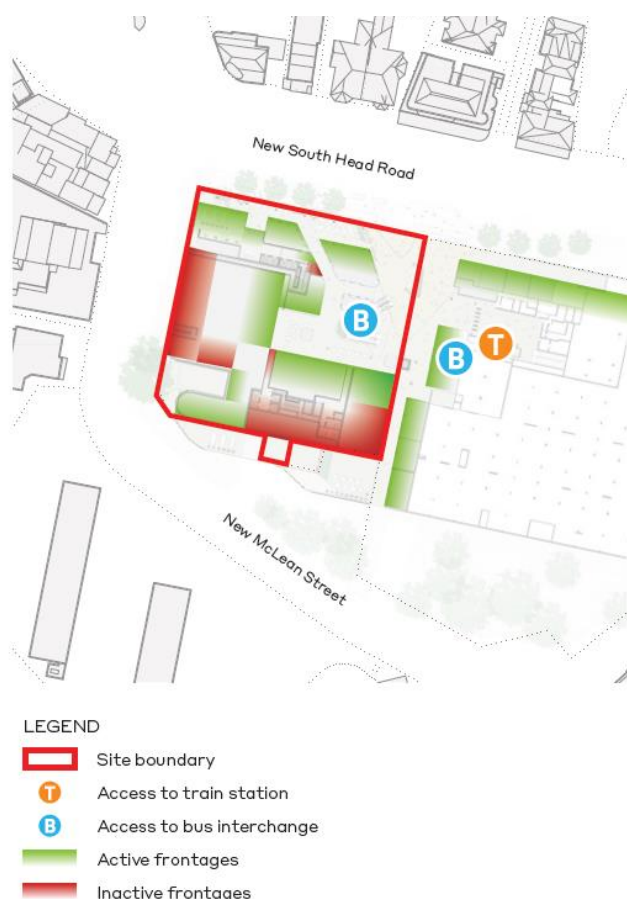


Figure 23 – Proposed active frontages

Source: Ethos Urban

4.4 Options Analysis

This section describes the background design work undertaken as part of the preparation of the Planning Proposal.

4.4.1 Different schemes explored

FJMT was engaged by Longhurst to review the development potential of the site and investigate options to redevelop the site in line with its surrounding context as well as the intended outcome for the site under Council's Opportunity Study 2010. The following options were explored and assessed. Each is elaborated on below and in the Urban Design Report prepared by FJMT in **Appendix A**.

- Option 1 – Compliant LEP scheme under the existing controls for the site;
- Option 2 – Opportunity Site Study envelope;
- Option 3 – Single lower broader tower envelope; and
- Option 4 – The proposed scheme (the subject of this Planning Proposal).

4.4.2 Site constraints and principles

In undertaking a review of the site's development potential, FJMT, Ethos Urban and GMU have identified the following site constraints and planning controls. Also identified are the built form principles which will support a built form outcome that is cohesive with its context.

- The proposed built form should be designed considering the principles of view sharing;
- Slender tower form to cast fast moving shadows to maintain solar access to Trumper Park;
- Extension of existing street walls along New South Head Road;

- Introduction of a street frontage component which is similar in height to development fronting New South Head Road; and
- A tower element which is setback from New South Head Road in order to be consistent with existing higher density residential typologies in the area.

4.4.3 Option 1 – Compliant LEP scheme under the existing controls for the site

A complying LEP envelope under the existing controls for the site is shown in **Figure 24**. A complying LEP envelope fails to best respond to the rare, unencumbered size of the site and its location adjacent to public transport, and does not support the increasing role of Edgecliff as a key transport interchange in the Eastern District nor support the principles of transit orientated developments.

The part 6m and 26m height limit forces a sub-optimal design outcome (i.e. a short squat building with inappropriate proportions) and insufficient density in proximity to key transport infrastructure. The demolition of the existing building on the site to redevelop up to 26m would not be feasible and this would be exacerbated given the constraints associated with the below ground rail easement. This option is therefore not realistic or optimal.



Figure 24 – Option 1, building envelope under the current LEP controls on the site

Source: FJMT

4.4.4 Option 2 – Woollahra Opportunity Site Study envelope

The Woollahra Council Opportunity Study Envelope tested a 53m height (17 storeys) and 6.05:1 FSR on the site. They study assumed the amalgamation of the site with the adjoining Eastpoint Centre (the adjoining site to the east). The outcome is shown in **Figure 25**. The envelope was included in a study of sites which Council identified as being capable of supporting additional density to meet the NSW Government's (then) housing targets, and comprised primarily residential uses with only minor retail for employment-generating floor space.



Figure 25 – Option 2 – Opportunity Site Study envelope (viewed from south-west)

Source: FJMT

The built form arrangement would make ADG compliance very difficult, if not impossible. The scheme would also fail to generate any feasible, modern, and efficient floor plates to support commercial development (which was not the predominant land use intended on the site under the scheme). The floor to floor heights (which are approximately 3.1m) would also be insufficient to meet the demands of retail and commercial development and would be insufficient for any loading requirements. Retail generally requires anywhere from 4.5 to 5m floor to floor heights and commercial generally requires 3.8m minimum floor to floor heights. On this basis, the Opportunity Site envelope would realistically be around a height of 72m if employment generating uses were factored in.

It is also noted that:

- The 17-storey street wall heights dominant the street front and supersede the general height pattern of existing street wall heights which front New South Head Road;
- The tower elements are not setback from New South Head Road which is inconsistent with the typologies in the area whereby tower elements are setback from the street. This results in a shear wall to the street that creates an undesirable pedestrian experience (and wind conditions) along New South Head Road;
- The envelope will have a significant impact on the views currently available to the residents of 170 and 180 Ocean Avenue in terms of Sydney CBD and Harbour views (elaborated in **Section 8.5**); and
- The envelope causes a larger, slow moving shadow which would shadow Trumper Park at 10am on 21 June which is inconsistent with the DCP.

4.4.5 Option 3 – Lower broader tower form, above podium setback envelope

Option 3 is shown in **Figure 26**. It aims to achieve the target FSR of 9:1, which comprises approx. 6:1 residential and 3:1 non-residential. This amount of FSR can be accommodated on the site appropriately and is comparable to density around other centres in Sydney (refer to **Section 8.2**). This FSR also allows the residential FSR envisaged by the Opportunity Site Study but adds a substantial amount of employment generating FSR (3:1) for a true mixed use transit orientated development.

Note that this option:

- Provides a better outcome than Option 1. It provides a 7m above podium setback to the western boundary and 10m setback to the eastern boundary to support ADG compliance and reduce overshadowing to the west;
- Provides a tower setback from New South Head Road to be compatible with the existing street wall;
- Supports enhanced view sharing (especially at the lower levels) for residents at 170 and 180 Ocean Avenue but will overshadow Trumper Park which is a significant public impact; and
- The form is broad and bulky at the base and tower element. This creates a more ill proportioned mass which would not allow sufficient articulation for a detailed building and extenuate the perceived bulk and scale of the building from the public domain.

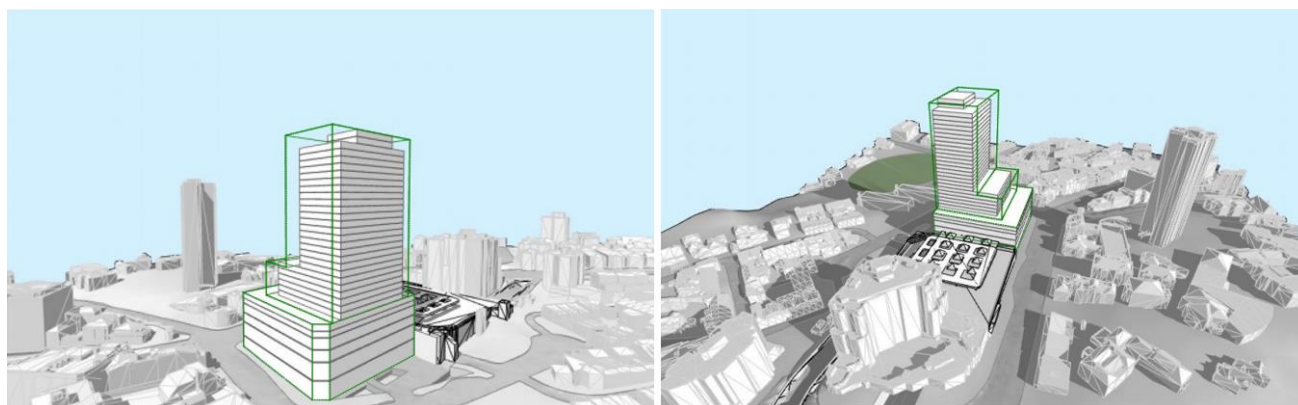


Figure 26 – Option 3 – lower broader tower form viewed from the south-west (left) and looking west along New South Head Road (right)

Source: FJMT

4.4.6 Proposed envelope scheme (the subject of this proposal)

The proposed envelope has been subject to testing by FJMT which has demonstrated it provides a better outcome compared to the other options identified in this section of the report. It also provides a better contextual response to the surrounding locality which highlights the suitability to accommodate a building form which supports an FSR of 9:1. This FSR allows the residential FSR envisaged by the Opportunity Site Study, but adds a substantial amount of employment generating FSR (3:1) for a true mixed use transit orientated development.

Within this envelope, an indicative scheme is shown to demonstrate how the LEP controls for the site (height and floor space) could foreseeably look. The planning proposal is an alternative pathway to facilitate the real and feasible construction of a transit-orientated, mixed use development up to a height of RL 195 on the site.

The proposed envelope is shown in **Figure 27**. How the form of the envelope compares to Option 2 and Option 3 is also depicted (refer to **Figure 28**). Although the proposed envelope is taller, the podium has been setback and reduced at the lower levels to better consider views to the Harbour and CBD for adjoining residents at 170 and 180 Ocean Avenue (refer to **Figure 29**). This mass has then been distributed upwards, into a slender tower which also reduces view loss impacts and creates a fast moving shadow for residents to the south, thereby reducing overshadowing impacts.

The building is also cut back on an angle on the western façade to ensure no overshadowing to Trumper Park between 10:00am and 2:00pm mid-winter in accordance with the DCP control (refer to **Figure 29**).

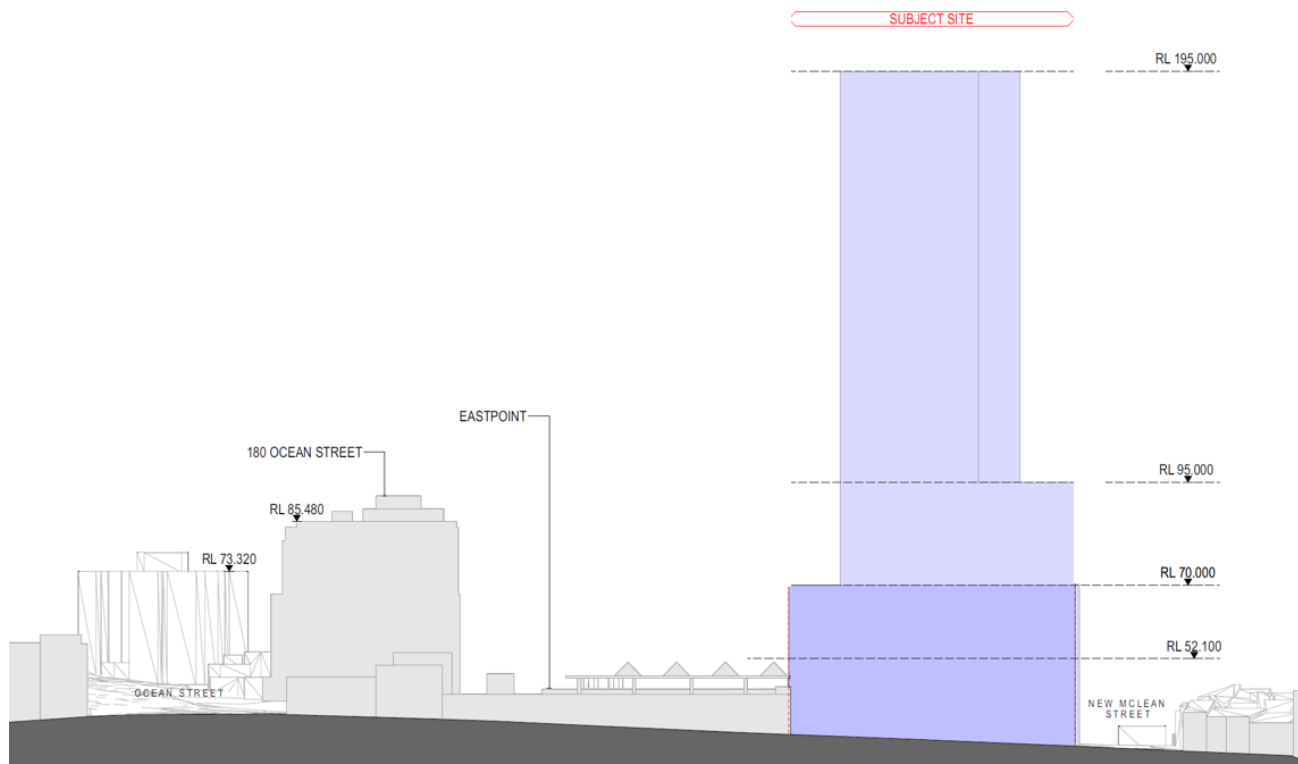


Figure 27 – Proposed envelope (north elevation) (envelope shaded purple)

Source: FJMT

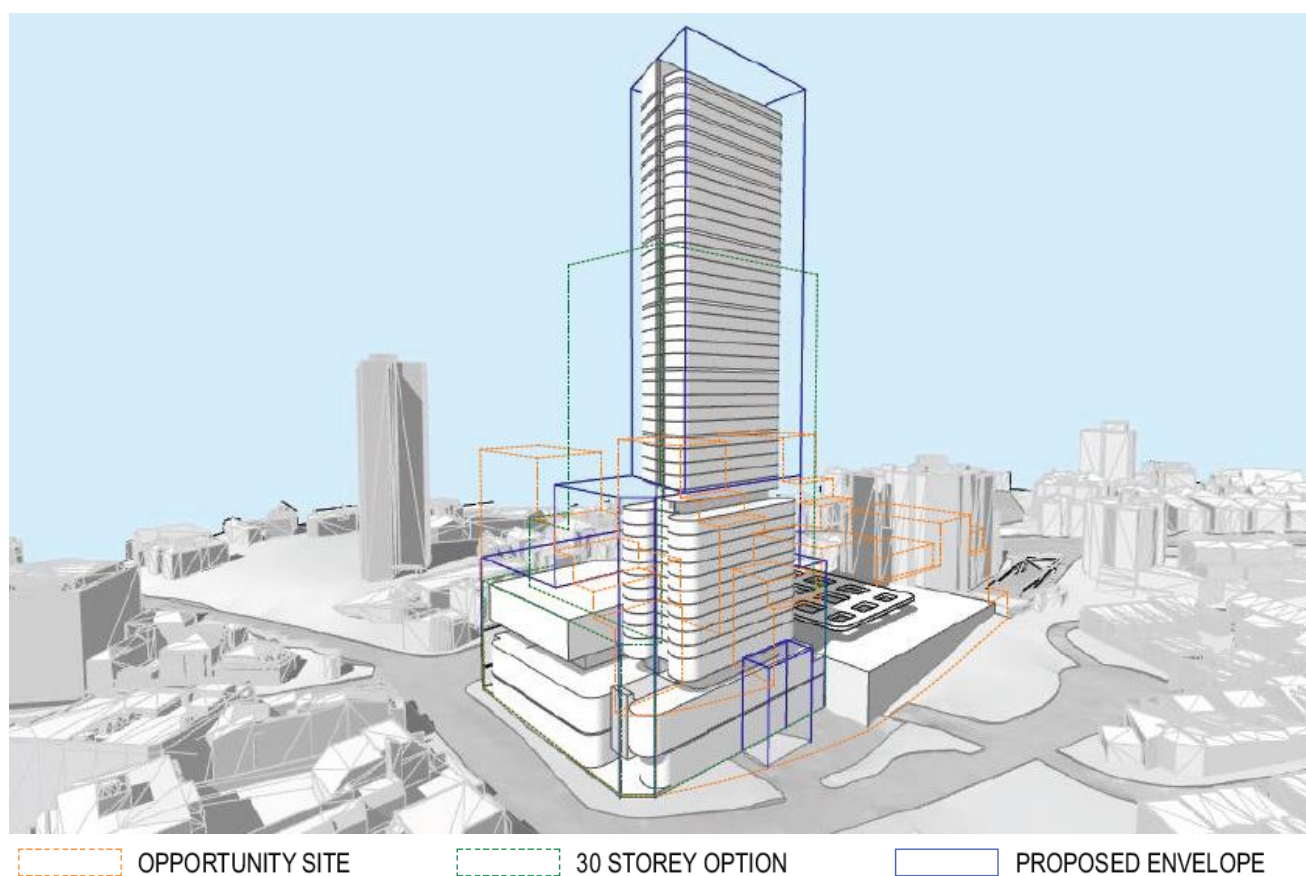


Figure 28 – Option 4 – Proposed envelope viewed from the south-west (top) and looking west along New South Head Road (bottom)

Source: FJMT

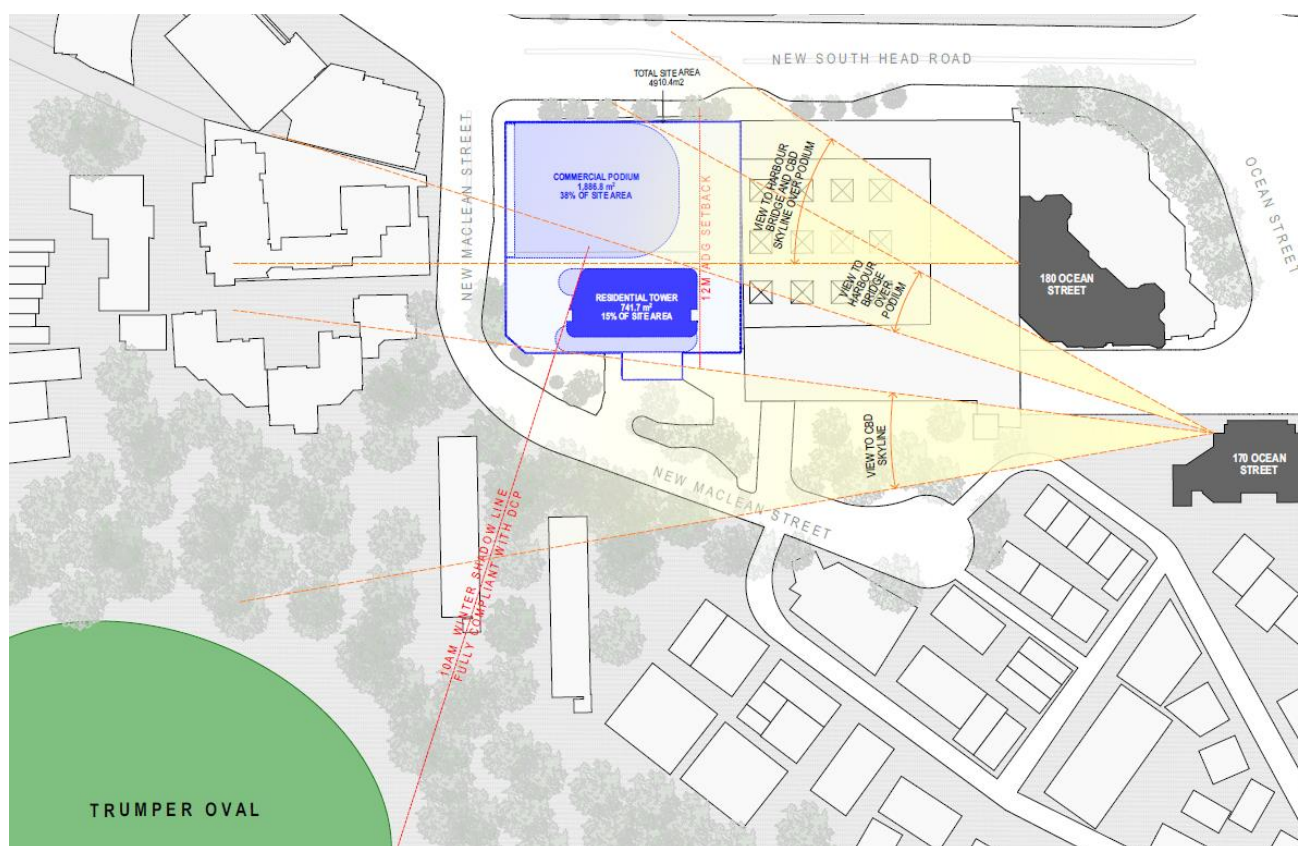


Figure 29 – Envelope and view analysis

Source: FJMT

This envelope and scheme more broadly will provide:

- The delivery of a truly transit-orientated, mixed use development which responds to the site and context, with the broad benefits proposed inextricably linked to the LEP amendment sought;
- The retention and increase in the variety of employment-generating floor space on the site;
- An elegant but identifiable entrance into Edgecliff from the east and a more navigable and visible connection from the street to the railway station and bus interchange;
- The provision of larger, premium grade floor plates (1,500 sqm+ for the commercial component) which can be more flexible to the needs of business and future workspaces, and are more attractive to tenants;
- A podium which is more consistent with the existing street wall character of New South Head Road and height of surrounding development;
- A more refined and elegant tower element (which occupies only 15% of the site area) than that which could be achieved under the existing LEP controls or the Opportunity Site draft;
- Significant public benefit, including improvements to the public domain in the form of a through-site link, publicly accessible open green space. There are also significant improvements to the Transport Interchange in the form of connectivity, accessibility and experience with the railway station and bus interchange;

The built form metrics of the proposed envelope are as follows:

Podium:

- Street frontage height: 38.5m;
- Lower podium height: 24.01m; and
- Upper podium height: 42.01m.

Overall Building:

- Building height: 167m;
- Eastern setback: 12m;
- Western setback: 12.45m – 24.17m; and
- Southern setback (road reserve): nil.

4.5 Indicative Concept / Development Outcome

In order to demonstrate that the proposed building envelope can deliver a feasible mixed-use development, FJMT has developed an indicative scheme (refer to **Appendix A**).

The Planning Proposal has been designed to be capable of accommodating public benefits including an activated through-site link, publicly accessible ground floor public plaza and open green spaces. There are also improved upgrades to the interconnectivity of the site to the railway station and bus interchange.

It should be noted that the indicative scheme is indicative only and has been prepared for the purpose of demonstrating that the proposed building envelope can deliver a viable scheme which complies with the proposed amended planning controls and can fit inside the proposed envelope.

The amendments to planning controls proposed in the Planning Proposal will support:

- A 45 storey mixed use building comprising a total GFA of approximately 44,190 sqm;
- Eight levels of basement car parking with capacity for 301 vehicles, accessed from the south of the site via New McLean Street;
- Revitalisation and enhancement of the existing intermodal and transport interchange within the site;
- Introduction of potential public community space (in consultation with Council) and open space at podium level; and
- Public domain and plaza area improvements at ground level.

A numerical summary of the concept development scheme is provided in **Table 2**.

Table 2 – Summary of indicative concept scheme key development parameters

Component	Development Concept
Site area	4,910 sqm
GFA	• 44,190 sqm, comprising: – 5,414 sqm of commercial office; – 7,143 sqm of retail; – 3,092 sqm of medical / well-being; and – 28,541 sqm of residential (with 232-268 residential apartments).
FSR	• 9:1, comprising: – 3:1 employment FSR (retail, commercial, medical, wellbeing); and – 6:1 residential FSR.
Maximum overall height	RL 192.68 (161.75m) to RL 195 (167m)
Street frontage height	RL 60.98
Residential apartments	232 - 268
Car parking spaces	• 301, comprising: – 117 retail spaces; – 184 residential spaces.
Bicycle spaces	387 • 268 residential spaces; and

Component	Development Concept
	119 non-residential spaces.
Motorcycle spaces	20

4.6 Transport Interchange

The site benefits from being located in the immediate vicinity of the Edgecliff transport interchange, with the main Eastern Suburbs Line located beneath the site and the Edgecliff bus interchange which is situated at the top of the Eastpoint Shopping Centre adjoining the site.

There are currently two transport interchange entrances, both accessible from Eastpoint Shopping Centre, including a primary entrance at New South Head Road and a secondary entrance from the rear at New McLean Street. The primary entrance to the transport interchange via Eastpoint Shopping Centre along New South Head Road is narrow and non-descript, acting more as a backdoor entrance than a main access point to a key transport interchange.

The adjoining Edgecliff Transport Interchange is formed within a stratum ownership arrangement which makes it a highly constrained site to facilitate meaningful improvements. In developing the vision for the Edgecliff Centre, the proposal has sought to enable the regeneration of this interchange in a purposeful way to offer significant benefits in improvement of inter-modal connection, station legibility and overall customer experience. The redevelopment of the Edgecliff Centre seeks to provide these improvements within its boundary utilising their own land and floor space for significant improvement to key public infrastructure and the realisation of a town centre.

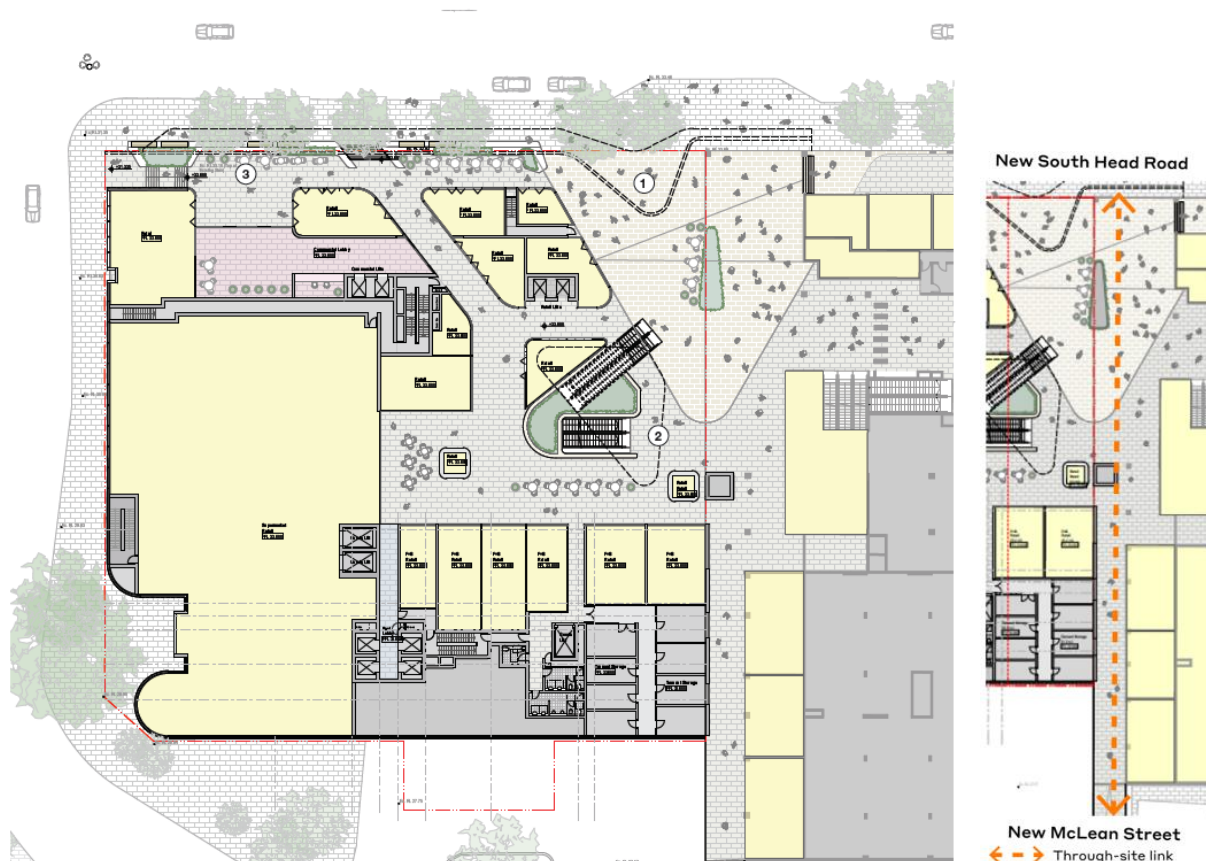
The design of the proposal directly responds to the proximate location to these key transport interchanges by providing direct vertical connections to the railway station below and the bus interchange above.

The scheme can facilitate the introduction of a 38m wide entryway along New South Head Road, which extends into a public plaza. This will soften the interface of the site and Transport Interchange from the busy six-lane New South Head Road, improve the site permeability, creating a highly legible entrance to the interchange, host the intermodal connection and create a place to congregate, mingle and meet. Unlike the existing, non-descript access point at New South Head Road, the proposed access point will be emphasised through appropriate signage and architectural design, providing a clear and intuitive opening to the transport interchange (refer to **Figure 30**). The extent of the enlarged entryway along New South Head Road is illustrated in **Figure 31**.



Figure 30 – Indicative proposed entrance to the transport interchange along New South Head Road

Source: FJMT

**Figure 31 – Ground floor plan identifying the transport interchange entrance and through-site link**

Source: FJMT & Ethos Urban

The proposal also enhances the through-site link that connects from this primary entrance along New South Head Road to New McLean Street at the rear, therefore affording the site with enhanced permeability (see **Figure 31**). In order to enhance the through-site link, parts of the walls separating the Edgecliff Centre site from the adjacent train station concourse will be removed. In turn, this fosters unimpeded active movement through the site and provides connections from the residential areas in the north to green spaces such as Trumper Park to the south.

In addition, the site includes a direct connection to the bus interchange from the new development by incorporating an open atrium. This additional connection to the bus interchange reduces reliance on the non-descript stairs in the Eastpoint Shopping Centre to access bus platforms and provides better integration and visual connection between the bus interchange and train station. It also provides visual access from the street, by way of large signage indicating that the entry leads to the bus interchange.

4.7 Access and parking

4.7.1 Vehicle Access

The indicative scheme incorporates eight levels of basement car parking. There will be two combined vehicle access and egress points to the south of the site, one for the residential basement car park (accommodating up to 184 car spaces) and the other for the commercial loading dock (accommodating up to three medium rigid vehicles) and commercial car park (accommodating up to 117 car spaces). The two upper basement levels will be dedicated to commercial uses and the bottom six basement levels will be dedicated to residential uses.

All vehicular entry and egress points for the proposal have been located within the road reserve which will act as a transition and buffer for all vehicular movements. This will result in only a single cross over at the pedestrian foot path improving the conditions for pedestrian movements.

The loading dock will likely be located on Basement Level 2, near the entry ramp to the commercial car park. No vehicular access will be provided to the western frontage along New McLean Street. This will culminate in a net reduction of two vehicular access and egress points, which will improve the traffic conditions (compared to current conditions) within close proximity to New South Head Road and New McLean Street interchange.

4.7.2 Pedestrian Access

The proposal retains the existing pedestrian points of entry and will provide an additional pedestrian access point at the south-western corner of the development via New McLean Street. This will allow for greater permeability and facilitate an active pedestrian environment. No points of pedestrian entry are located at the southern side of the development through the road reserve.

4.8 Green Infrastructure and Landscaped Outcomes

The proposal along with the indicative scheme includes the opportunity for a high-quality landscaped environment, which significantly ameliorates the existing harsh site environment. The primary frontage along New South Head Road is to be improved by a new arrival experience in the form of a 38m wide entryway to the transport interchange. This will be accompanied by a public plaza which will provide an improved pedestrian experience and allow for a more permeable ground plane and podium with placemaking opportunities to enhance the experience for the community. There will also be attractive fine-grain laneway retail that fronts New South Head Road and invites pedestrians to travel through the site, contributing to an active retail experience.

The proposal will also include the delivery of publicly accessible open green space above the mixed-use podium structure that fronts New South Head Road (see **Figure 33**). This will significantly enhance the public domain by providing landscaping features that adorn the development, while increasing the open space that is offered at ground level and on the rooftop of the mixed-use podium.

As shown in **Figure 34**, the podium beneath the residential tower will be surrounded by trees and the peak of the podium will be lined with planting to the north. Opportunities for further activation such as active uses and placemaking initiatives will be investigated throughout the detailed design process

The northern edges of Level 2 and the Level 2 Mezzanine will be lined with an abundance of landscaping features. A new circulation route is to be provided to connect to the bus interchange that adjoins the site to the east, and the bus interchange interface will be improved with a publicly accessible open green space which interacts with the proposed development with enhanced landscaping.

This proposal offers a unique opportunity to provide a meaningful and accessible open green space within a constrained urban setting utilising the public nature of the bus terminal creating an extension of the existing public domain into a multi-functional public realm destination, encouraging active use and not just commuting.

The bus interchange will be improved with a landscape buffer placed around the edge of the site, as demonstrated in **Figure 32**.

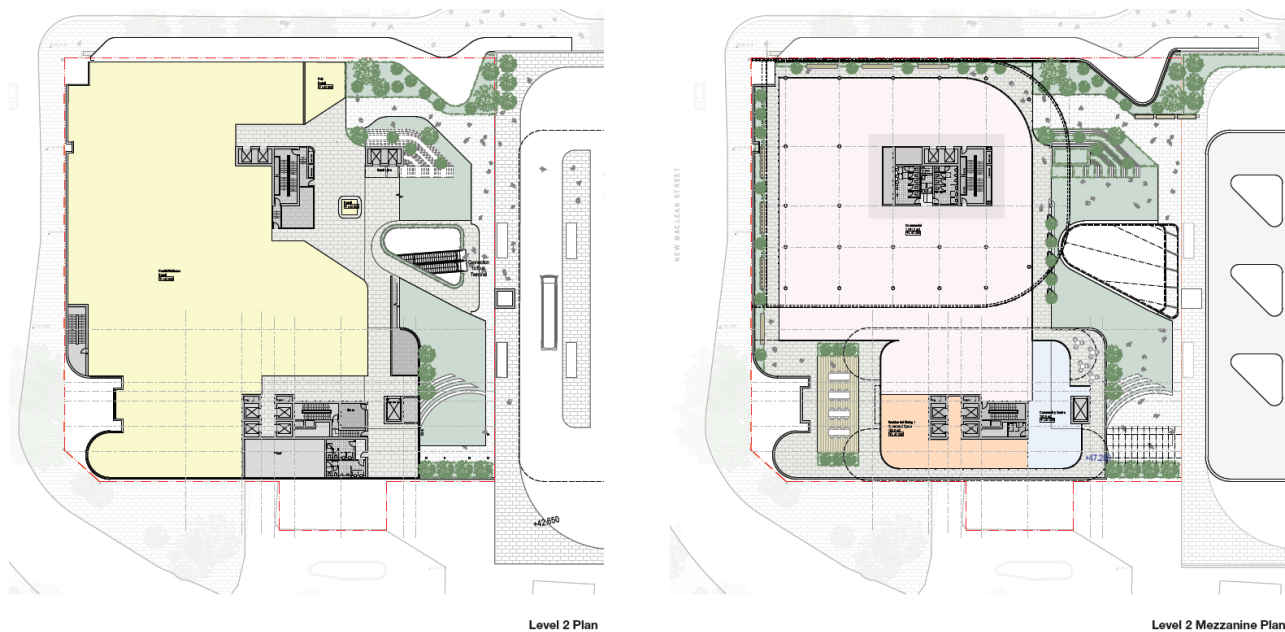


Figure 32 – Indicative scheme with landscape elements - Level 2 (left) and level 2 mezzanine (right)

Source: FJMT



Figure 33 – Landscape buffer at the bus interchange

Source: FJMT



Figure 34 – Sky plaza and publicly accessible open space (indicative scheme)

Source: FJMT

5.0 Part 1 – Objectives and Intended Outcomes

The intent of the Planning Proposal is to amend the height and floor space controls applicable to the site to allow additional height and floor space on the site.

The objectives and intended outcomes are to:

- Capitalise on the unrestrained ownership structure of the site and its position immediately adjacent to the existing railway station and bus interchange, to facilitate a great opportunity for additional employment, medical/wellness, retail and residential floor space.
- Promote the more efficient use of land from a single site by allowing greater height and density within an established Centre, to promote a sustainable public transport-orientated development.
- Provide improved pedestrian permeability and inter-modal connectivity from the site with the existing below-ground Edgecliff railway station and vertically with the bus interchange.
- Provide a greater contribution to the locality by providing a truly mixed-use development which can provide uses (such as retail, commercial and medical/well-being) to support the immediate, day-to-day needs of residents in an accessible location.
- Provide an improved urban design and pedestrian permeable outcome at ground level with good street activation, especially fronting New South Head Road.
- Facilitate place making on the site through the provision of varied land uses and spaces for public enjoyment.
- Concentrate density where it is considered most appropriate (i.e. within a centre, close to a railway station) while supporting the preservation of existing surrounding lower density residential areas in the LGA.
- Support the continuation and enhancement of non-residential floor space in the Centre.
- Allow existing Woollahra residents to enjoy the benefits stemming from the co-location of medical and well-being services and transport to support 'ageing in place' where residents are able to access local services

without the need for broader travel outside the LGA. The intent is to provide medical and well-being services which can broaden the diversity and continuum of local care available in Woollahra.

6.0 Part 2 – Explanation of Provisions

6.1 Land Use Zoning

The Planning Proposal will not amend the existing B2 Local Centre zone. The indicative development concept proposes a mix of land uses that will include commercial office, retail, medical and shop top housing, all of which are permissible with development consent under the B2 Local Centre zone.

6.2 Development Standards

The Planning Proposal incorporates the following amendments to the LEP for the site (refer to **Table 3**).

Table 3 – Summary of proposed amendments to Woollahra LEP

LEP Provision	Existing	Proposed
Building Height	6m and 26m	RL 195
Floor Space Ratio	2.5:1	9:1
Introduction of a minimum non-residential floor space provision	-	Dedication of 3:1 (out of the total proposed 9:1) FSR for non-residential land uses only.

The objectives and intended outcomes identified in Part 1 are intended to be achieved by allowing greater height and floor space on the site by way of amendments to the Woollahra LEP. This will include:

- Amendments to the Height of Buildings Map (Sheet HOB_003) to reflect a maximum building height of **RL 195** on the site; and
- Amendments to the Floor Space Ratio Map (Sheet FSR_003) to reflect a maximum floor space ratio of **9:1** on the site.

6.2.1 Minimum non-residential floor space provision

A minimum non-residential FSR of 3:1 is also proposed in the Woollahra LEP. This will ensure the site provides a minimum amount of employment-generating floor space which cannot be used for residential purposes.

The likely method of implementation will be the insertion of the site-specific clause within Part 6 (Additional local provisions) of the Woollahra LEP (subject to discussion and agreement with Council). Indicative drafting is provided below.

Clause XXX – Non-residential floor space in the Edgecliff Centre

(1) The objective of this clause is to ensure development provided in the Edgecliff Centre continues to provide commercial floor area for employment generation purposes.

(2) This clause applies to Lot 203 in DP1113922 and Lot 5 DP243380, being 203-233 New South Head Road, Edgecliff.

(3) Development consent must not be granted for a mixed use development identified on land in subclause (2) unless the consent authority is satisfied that a gross floor area equivalent to an FSR of 3:1 is dedicated to non-residential land uses.

(4) In this clause, non-residential floor space 203-233 means the ratio of the gross floor area of that part of a building used or proposed to be used for any purpose in all buildings within a site to the site area, other than for any of the following purposes—

(a) residential accommodation,

- (b) serviced apartments,
- (c) a car park

6.3 Draft Development Control Plan

A Draft Development Control Plan (**draft DCP**) amendment to the Woollahra Development Control Plan 2015 for the site will be prepared by the proponent in collaboration with Council and will likely largely be guided by the indicative scheme analysis undertaken by FJMT. The draft DCP will enshrine the vision and objectives for the site, and will provide a clear framework to guide and regulate future development in accordance with the proposed LEP controls.

It will likely be determined at Gateway Determination whether it is a stand-alone DCP or an amendment to Part G (Site-Specific Controls) of the existing Woollahra DCP and will be publicly exhibited concurrently with the Planning Proposal. This will enable greater detail regarding the proposed built form and layout of the site. The DCP will likely contain:

- A vision statement;
- Objectives and/or principles;
- Structure plan;
- Principles to achieve architectural design excellence;
- Objectives and controls for:
 - Public domain;
 - Built form matters, including height and setbacks;
 - Access and movement (i.e. vehicular, cycle, pedestrian);
 - Open space and community infrastructure;
- Sustainability initiatives and benchmarks; and
- Supporting figures, including maps and sections for thematic elements (e.g. access and movement, setbacks, activation).

Importantly, this will establish key objectives and controls for the proposed integration and mix of uses.

7.0 Part 3 – Justification

7.1 Section A – The need for the Planning Proposal

7.1.1 Q1. Is the planning proposal a result of an endorsed local strategic planning statement, strategic study or report?

Yes. The Planning Proposal will:

- Give effect to several planning priorities in the Woollahra Local Strategic Planning Statement 2020 (**Woollahra LSPS**) which was endorsed by the Greater Sydney Commission (**GSC**) in March 2020.

Woollahra Local Strategic Planning Statement 2020

The LSPS sets out a 20-year vision for the Woollahra LGA and establishes planning priorities to identify and manage:

- Future land use and growth;
- New technology and changing community needs;
- Heritage conservation and local character;
- Environmental resilience and sustainability; and

- Areas worthy of further detailed strategic planning.

The LSPS includes a number of planning priorities and actions that when read together support the investigation of renewal of the Edgecliff Centre and the site. In particular, under Planning Priority E1, the draft LSPS includes at action 6 that over the short to medium term Council will:

'Work with our community and government agencies to increase the role of Edgecliff as a key transport interchange in our area'.

The renewal of the site which will protect and increase commercial floor space and increase housing supply which will support the increased role of Edgecliff as a key transport interchange in the LGA. It will increase the quantum of jobs and homes closer to the interchange and will support how people move around the centre and function as an urban marker delineating the location and significance of the interchange.

Also, under Planning Priority E7, Action 41 seeks to *'introduce planning controls into the Woollahra Local Environmental Plan 2014 and Woollahra Development Control Plan 2015 to protect and enhance floor space for commercial, retail, business, health and community uses in centres, particularly in Double Bay and Edgecliff'.*

The proposal seeks to expand commercial (including retail) and health uses. This can support job containment in the Woollahra LGA (which at the moment only has 19,450 local jobs compared to 28,005 employed people). With additional housing close to this floor space, it may increase the desirability for employers and employees who value convenience and align to the Greater Sydney Commission's vision for a 30-minute City.

The proposal will also support the provision of new housing in the LGA which can feed into Council's Housing Strategy and longer-term housing outcomes. It will also support the Eastern District's broader housing supply targets over the next 6-10 and 20 years. Council has already specified in the LSPS that the Planning Reviews for Edgecliff and Double Bay will seek opportunities to increase housing and employment in these key local centres, and the proposal can significantly contribute to additional housing and employment on a single site. Further assessment of the consistency of the proposal with other LSPS planning priorities is included in **Section 8.2.2**.

Edgecliff Centre Strategic Study and Urban Design Study

A Strategic and Urban Design Study has been prepared by Ethos Urban and GMU and is submitted with the Planning Proposal (refer to **Appendix E**). Combined, the studies provide analysis from a strategic planning and urban design perspective to demonstrate the redevelopment of the site (under this Planning Proposal) has sufficient strategic merit to proceed to a gateway determination by addressing strategic and urban design considerations.

From a strategic planning perspective, the following is of note:

- Under the strategic planning framework, Edgecliff is designated as a Local Centre. This type of centre plays an important role in providing access to goods and services close to where people live. Increasing the level of residential development within walking distance of centres with a supermarket is a desirable liveability outcome.
- The *Future Transport 2056* Plan identifies the importance of transport interchanges as places which will have a high level of accessibility as service frequencies and travel times are improved. On this basis, the *Greater Sydney Region Plan* states that there will be potential for interchanges to deliver mixed-use, walkable, cycle friendly centres and neighbourhoods and that Council's need to consider local conditions through place based planning that provides for centres around interchanges to grow and evolve over time and potentially become strategic centres. This is especially crucial given the constrained land opportunities within Edgecliff which limits place based planning opportunities within this centre. The opportunity for future growth within transport interchanges, where redevelopment potential is scarce, are generational and will be limited in future.
- Under the *Greater Sydney Region Plan*, Bondi Junction is the only Strategic Centre for the northern parts of the Eastern District. As previously mentioned, Edgecliff is the next level down in the hierarchy and is identified as a Local Centre. It however is larger in footprint and scale than most other local centres and has a number of attributes that suggest it already or has the potential to function as a form of Strategic Centre for that part of the Eastern District closer to the Sydney CBD (Edgecliff is just over 2km from the eastern edge of the Sydney CBD).

- For example, the District Plan notes that centres with a supermarket (Edgecliff contains two) qualify as larger local centres. Support for an elevated role is reinforced by the Woollahra LSPS which designates the centre as a 'key local centre'.
- Under the previous metropolitan plan, Edgecliff and Double Bay combined were designated as a Town Centre, which confers greater significance than that of a local centre. It is conceivable that with the right planning interventions, Edgecliff and Double Bay can be guided to evolve as a more coherent single centre comprising two distinct but related parts.

7.1.2 Q2. Is the planning proposal the best means of achieving the intended outcome?

The site-specific amendments proposed to the Woollahra LEP are considered the best way of achieving the intended outcomes established under **Section 5.0**. The following options have been assessed, which is additional to the built form analysis undertaken in **Section 4.4**.

The options included:

- Option 1 – Do nothing.
- Option 2 – Redevelop the site under the current controls of the Woollahra LEP 2014.
- Option 3 – Prepare and submit a Development Application (**DA**) and request to vary a development standard pursuant to clause 4.6 of the Woollahra LEP to vary the Height of Buildings and Floor Space Ratio development standards.
- Option 4 – Wait for Council to progress their own planning for the Edgecliff Centre following the completion of the *Edgecliff Commercial Centre Planning and Urban Design Study*.
- Option 5 – Prepare a site-specific Planning Proposal to amend the Height of Buildings and Floor Space Ratio development standards (the subject of this planning proposal).

Option 1 – Do nothing

This option involves the operation of the existing commercial building on the site in its current form and function. Given the location of the site (above a railway line and within an established Centre), this option is considered a lost opportunity to provide additional housing, jobs and services in a highly accessible location, and providing density where it is most appropriate.

The existing centre is outdated and is nearing the end of its optimal life. The building suffers from an above average vacancy and will continue to offer poor productivity without significant investments to ensure the offering is relevant to modern tenant requirements. The existing connectivity and interface to Edgecliff Station and bus interchange is also poorly connected and is overdue for vast improvement (this is despite recent TfNSW investment in lift / DDA upgrades to the platform and station interface).

The 'do nothing' option forgoes a unique opportunity to deliver significant enhancements to the connectivity of the existing intermodal transport connection. The opportunity to facilitate a place-based planning approach to the site to accommodate additional employment generating uses, allied medical/well-being uses, a diversity of housing product and open space in a highly accessible location would also be lost.

The 'do nothing' option would also forgo the following public benefits:

- An exemplar transit orientated development;
- Additional housing supply and density within a high accessible and well-serviced location;
- Providing additional housing density removing the need for significant additional density in the established low density areas of the LGA;
- Improved street activation, pedestrian permeability, and an improved interface with the existing bus interchange;
- Improved intermodal transport connectivity for commuters between the bus interchange and railway station;
- Introduction of a public open green space fronting the existing bus interchange;

- Expansion of medical/well-being and updated relevant retail (including supermarket) uses to support the local community; and
- Diversification of more productive commercial floor space to meet the current and future needs of the community.

Option 2 – Redevelop the site under the current controls of the Woollahra LEP 2014

The shortfalls of a complying LEP envelope have been assessed in **Section 4.4.3**. A redevelopment scenario under the current controls would not support the intended outcomes of this Planning Proposal and would provide a sub-optimal urban design outcome and sub optimal transit oriented development outcome.

Option 3 – Development Application and Clause 4.6 variation request

In order to achieve the intended outcome, additional height and floor space is required for the site. Under the existing controls, this would require a variation to the Height of Buildings and FSR development standards prescribed by the current LEP.

Although relevant case law provides guidance which has established that the extent of the numerical variation does not form part of the test required to be exercised under clause 4.6, we are of the opinion that such reliance on clause 4.6 in this instance, is not the most appropriate pathway in achieving the intended outcome.

This is because there is strategic merit in seeking uplift in order to renew the site to create a truly mixed use, integrated development, more commensurate with its Centre location. This requires the preparation of a new, more appropriate planning framework (including a site-specific DCP) to support this vision, rather than relying on the existing controls (which would be inconsistent with the redevelopment of the site) and satisfying the relevant tests under clause 4.6.

Option 4 – Wait for the Edgecliff Commercial Centre Planning and Urban Design Study

The Woollahra LSPS indicates that Council is preparing (at the time of writing) the Edgecliff Commercial Centre Planning and Urban Design Study. This is anticipated to be completed potentially by end of 2020 for adoption for exhibition. Strategic planning for the Edgecliff Centre has however been in motion over several years (which has included a Commercial Centre Study in 2015 and an Opportunities Sites Study in 2010).

Once the Study is complete, it will likely be subject to Council endorsement for exhibition purposes, public exhibition and then finalisation. After this, any planning changes arising from the recommendations of the Study, still require a Planning Proposal to be implemented. We understand that the Study has been in process since 2015 and at time of writing there is no specific likely gazettal date of a Planning Proposal associated with the Study available for Longhurst to allow Longhurst to plan for the future of the Centre.

Conversely, Longhurst, over the last two years, have developed a specific and carefully considered urban design response to the site. This has involved meticulous design, testing and analysis having regard to the constraints surrounding the site (including in particular view sharing and overshadowing), as well as the physical characteristics of the site, its context to existing transport infrastructure and the overall environmental capacity for an unencumbered site to deliver transit oriented development and density.

The Planning Proposal has been prepared by FJMT with guidance from a multifaceted consultant team including Ethos Urban, ARUP, Aurecon, GMU, Curio, Cred Consulting and Richard Lamb and Associates. It is therefore well researched and well responsive to the strategic planning context of the site, including the goals of the Woollahra Council LSPS.

Existing leases on the site expire in 2022 and Longhurst require to progress the planning of the site to allow the timely consideration of the next evolution of its life. This requires the lodgement of a Planning Proposal in a timely manner, in advance of the likely time long tail of the Edgecliff Commercial Centre Study overall LEP. This Planning Proposal is ready for lodgement and will contribute to vitality of the centre in a post COVID world and beyond. This Planning Proposal does not preclude Council's consideration of the overall town centre LEP.

Option 5 – Site-specific Planning Proposal (this application)

As mentioned above, we consider that the intended outcome warrants a new planning framework (i.e. new controls) which will accommodate (in terms of height and floor space) a built form that is appropriate for the site and its context in a timely manner to allow Longhurst planning certainty on a site where leases are expiring in a suboptimal existing built form outcome. This will be supported by a site-specific DCP which will guide the finer-grain, detailed design outcome envisioned under the higher LEP framework.

7.2 Section B – Relationship to Strategic Planning Framework

7.2.1 Q3. Will the planning proposal give effect to the objectives and actions of the applicable regional, or district plan or strategy (including any exhibited draft plans or strategies)?

Yes. The applicable plans are:

- The Greater Sydney Region Plan (**the Region Plan**); and
- Eastern City District Plan (**the District Plan**).

Greater Sydney Region Plan – A Metropolis of Three Cities

The *Greater Sydney Region Plan* is the overarching strategy for growing and shaping the Greater Sydney Area. It sets a 40-year vision (to 2056) and establishes a 20-year plan to manage growth and change for Greater Sydney in the context of social, economic and environmental matters.

The plan was adopted in March 2018 and seeks to reposition Sydney as a metropolis of three cities – the western parkland city, central river city, and the eastern harbour city. In the same vein as the former *A Plan for Growing Sydney*, the Plan provides 10 high level policy directions supported by 40 objectives that inform the District Plans, Local Plans and planning proposals which follow in the planning hierarchy.

This Planning Proposal is consistent with the following policy directions and objectives of the Plan (refer to **Table 4**):

Table 4 – Consistency of this Planning Proposal with the relevant directions and objectives of the Greater Sydney Region Plan

Direction	Objective	Comment
A city supported by infrastructure	Objective 4: Infrastructure use is optimised	This Planning Proposal seeks to respond to and better utilise the existing Edgecliff Station and bring additional housing, jobs and services directly adjacent to an existing transport hub.
A city for people	Objective 6: Services and infrastructure meet communities' changing needs	This Planning Proposal will support the provision of a variety of services and health service facilities which is directly accessible via Edgecliff railway station. This supports improved health outcomes and supports ageing in place.
Housing the city	Objective 10: Greater housing supply	This Planning Proposal will support the provision of additional housing (in the form of one, two and three-bedroom residential apartments). This will assist in supporting the additional housing demand (including demand generated from professionals and local residents looking to downsize) anticipated for Greater Sydney (being an additional 725,000 homes by 2036).
A city of great places	Objective 12: Great places that bring people together	This Planning Proposal will support a mix of land uses and activates in a highly accessible location, supporting good social connections.
A well-connected city	Objective 14: A Metropolis of Three Cities – integrated land use and transport creates walkable and 30-minute cities	This Planning Proposal integrates jobs and housing supported by a strong public transport network. It will collocate retail and services, reducing travel and supporting more efficient public transport use.
Jobs and skills for the city	Objective 22: Investment and business activity in centres	This Planning Proposal will support the location of trip-generating activities and employment floor space above a railway station. It will support the creation of local jobs and increase productivity.
An efficient city	Objective 33: A low-carbon city contributes to net-zero emissions by 2050 and mitigates climate change	A key initiative of this Planning Proposal is to deliver a more sustainable development than is presently provided, and as such sustainability targets will be set for the development in the DCP.

Eastern City District Plan

The District Plan underpins the Region Plan and sets the 20-year vision for the District through 'Planning Priorities' that are linked to the Region Plan. This Planning Proposal is consistent with the following Planning Priorities.

Planning Priority E1 – Planning for a city supported by infrastructure

Objective 4 – Infrastructure use is optimised

The Planning Proposal maximises the utility of the existing Edgecliff Station and seeks to provide a new, mixed-use transit-orientated development which can directly leverage of the accessibility provided to it by the station.

Planning Priority E3 – Providing services and social infrastructure to meet people's changing needs

Objective 6 – Services and infrastructure meet communities' changing needs.

The Planning Proposal will support the provision of retail (including supermarket) and medical/well-being related land uses to support the current and long term needs of the community, and improve the accessibility of these services given its location adjacent to the existing railway station. This will be particularly pertinent to support the older residents which continues to increase in the district¹.

Planning Priority E5 – Providing housing supply, choice and affordability, with access to jobs, services and public transport

Objective 10 – Greater housing supply.

There is the need for an additional 157,500 homes between 2016 and 2036 for the Eastern City District, based on population projections by the (former) Department of Planning and Environment. The proposal will support the provision of 232-268 residential apartments on a single site, contributing to the 0-5-year housing target for Woollahra (being 300 dwellings), and attainment of the overall housing target for the district. Notwithstanding this, ongoing forecast data prepared by the Department (since 2018), issued by the GSC in their letter of support to Woollahra Council on their LSPS, indicates a projected need of 500-600 dwellings from 2021 to 2026². The proposal can play a critical role in providing for a large portion of this anticipated demand, within a highly accessible and appropriate location while reducing the need for new density to be placed within Woollahra's established neighbourhoods. This is important because studies undertaken on behalf of Council which are intended to inform Council's Local Housing Strategy, conclude that there is an apparent shortfall in capacity of current controls to support new high density residential housing (i.e. apartments)³.

The proposal also looks to concentrate new housing so as to optimise the use of existing infrastructure (being the Edgecliff railway station). In doing this, accessibility to employment, social and essential services is also optimised.

Planning Priority E6 – Creating and renewing great places and local centres, and respecting the District's heritage

Objective 12: Great places that bring people together

The Planning Proposal will directly contribute to the renewal of the Edgecliff centre. More specifically:

- The redevelopment is centred around a people-focused ground floor and podium comprising a mix of land uses including fine grain retail and open space, which is walkable, enjoyable and of a human scale;
- The redevelopment supports social infrastructure and services in the heart of Edgecliff and co-locates this will transport access;
- There will be an expansion of retail and commercial floor space and expansion of employment opportunities which will attract business into the heart of Edgecliff and increase the opportunity for local jobs; and
- Supports additional residential development in the centre, in immediate proximity to transport. This reduces reliance of vehicle usage and increases daily critical mass to support the viability of goods and services on the site and within the broader Edgecliff Centre.

¹ In the Eastern City District, 16 per cent of the District's population will be aged 65 or over in 2036, up from 12 per cent in 2016. This is resultant of an 102% proportional increase in people aged 85 and over and a 64% increase in the 65-84 age group, is expected by 2036.

² Letter of Support: Woollahra Council draft Local Strategic Planning Statement, Greater Sydney Commission, 12 March 2020.

³ Woollahra Municipal Council - Ordinary Council Meeting Minutes, 29 September 2020

Planning Priority E10 – Delivering integrated land use and transport planning and a 30-minute city**Objective 14**

The Planning Proposal introduces residential uses on the site and expands on commercial, health and retail uses with immediate access to rail and bus services. It will allow more efficient access to jobs, services and home, increase the proportion of trips made by public transport and reduce the need for longer commutes. The renewal of Edgecliff Centre underpins the notion of a 30-minute city.

Planning Priority E19 – Reducing carbon emissions and managing energy, water and waste efficiently**Objective 33**

The Planning Proposal will support a more ecologically sustainable development on the site. It will support development with a target of achieving a NABERS Energy rating of 5 stars, and a 4 Star NABERS Water rating. The proposal is also consistent with the principles of Transit Orientated Development (TOD) in that new employment is provided in a highly accessible location thus reducing reliance on the private motor vehicle.

NSW State Plan 2021

The New South Wales State Plan sets the strategic direction and goals for the NSW Government across a broad range of services and infrastructure. The Planning Proposal is consistent with the revised NSW State Plan 2021 in that it will:

- Create construction jobs;
- Contribute to housing supply;
- Encourage business investment; and
- Develop a high-quality development in proximity to existing state transport infrastructure.

NSW State Infrastructure Strategy 2018

The NSW State Infrastructure Strategy 2018-2038 brings together the infrastructure investment and land use planning of the Future Transport Strategy 2056 and the Greater Sydney Region Plan, and is underpinned by the State Infrastructure Strategy 2018–2038: Building Momentum that established a pipeline of investment for infrastructure that is underway or in advanced planning.

The Strategy sets out the NSW Government's vision for infrastructure over the next 20 years, focussing on aligning investment with sustainable growth. For Metropolitan NSW, the primary goal is to provide residents with access to jobs and services within 30 minutes, known as the '30-minute city' model.

The Strategy sets out six directions for infrastructure in NSW, of which the following is relevant:

- *Integrating land use and infrastructure planning.* This planning proposal looks to maximise the use of the existing Edgecliff railway station by developing within the centre of Edgecliff so as to capitalise on the accessibility it provides. This seeks to 'get the most' out of current infrastructure stock given the State's growing population and tightening fiscal measures.

Future Transport Strategy 2056

The *Future Transport Strategy 2056* is the 2017 update of the NSW Long Term Transport Master Plan and supersedes the Master Plan. It is a 40-year vision for mobility in NSW, developed with the Greater Sydney Commission, the Department, and Infrastructure NSW. It seeks to ensure that transport planning and land use planning are fully integrated and is based upon the key themes of a Productive Economy, Liveable Communities and a Sustainable Society.

This Planning Proposal will best serve the objectives of this Plan through:

- Supporting the '30-minute city' model allowing better access to jobs and essential services closer to home, and closer to each other;

- Facilitating integrated transport and land use planning, allowing for better activation of the existing public spaces fronting and adjoining the site, and improve liveability by making essential, retail and medical/well-being services more accessible;
- Supporting the utilisation of the rail system, by providing significant employment opportunities in direct proximity to an existing heavy rail station; and
- Assisting to unclog the Sydney CBD transport system by connecting more people to existing heavy rail and the bus interchange and encouraging patronage of an existing network.

Greater Sydney Services and Infrastructure Plan

The Greater Sydney Services and Infrastructure Plan is the 40-year plan for transport in Sydney and supports Future Transport 2056 and the Regional Plan. The plan establishes the specific outcomes transport customers in Greater Sydney can expect and identifies the policy, service and infrastructure initiatives to achieve these. It aims to enable people and goods to move safely, efficiently, and reliably around Greater Sydney, while facilitating access to nearby centres within 30 minutes by public transport.

The Planning Proposal is consistent with the Greater Sydney Services and Infrastructure Plan as it will:

- Provide a through site link and a permeable public plaza that will facilitate safe walking routes throughout the Edgecliff Centre;
- Deliver a variety of employment uses and dwellings in the vicinity of the Edgecliff transport interchange, making metropolitan and strategic centres easily accessible within 30 minutes;
- Create an integrated transport interchange, that allows for seamless interchanging between services within five minutes;
- Provide a direct connection to the bus interchange, while also widening the transport interchange entrance to make it more accessible for all customers.

Q3a. Does the proposal have strategic merit?

The proposal is considered to have strategic merit. This is because it is consistent with the applicable strategic planning framework set by the State and by Council. Specifically, the Planning Proposal will facilitate development which:

- Effectively responds to existing infrastructure (the Edgecliff Railway Station) and provides more efficient access to housing, jobs and services to an existing transport hub. It also reduces reliance of vehicle usage and increases daily critical mass to support the viability of goods and services on the site and within the broader Edgecliff town centre;
- Contributes to the 0-5-year housing target for Woollahra (including the most recent targets identified for Woollahra), and the attainment of the overall housing target for the district, thereby assisting in protecting lower density areas from development pressures; and
- Protects but modernises commercial floor space to support the increased role of Edgecliff as a key transport interchange and Centre.

Q3b. Does the proposal have site-specific merit?

The proposal is considered to demonstrate site-specific merit because:

- It is a large urban site in the Edgecliff Centre that is unencumbered with any significant natural environmental values;
- Technical input has demonstrated it can be readily serviced by utilities and infrastructure to support the proposed use and density;
- It sits above the Easter Suburbs Railway line, adjacent to the Edgecliff Railway Station and directly adjoins the Edgecliff Bus Interchange;
- It will not overshadow Trumper Park between 10:00am and 2:00pm in mid-winter as per DCP controls;
- The built form has considered the existing uses surrounding the site, especially in relation to:

- View sharing for the residents at 170 and 180 Ocean Avenue; and
- Overshadowing to the existing residents to the south.
- The design concept confirms that a design solution can be achieved for the residential component that is consistent with the objectives and guidelines of SEPP 65 and the Apartment Design Guide;
- A high-quality design solution is proposed that is capable of achieving design excellence;
- Vehicular access and servicing can be achieved in an acceptable manner and the density proposed can generate no net increase in traffic when compared to current conditions;
- It considers the existing commercial role of the site and seeks to protect, increase and enhance employment-generating floor space;
- The proposal can support the changing demographics of the area. In particular, it will:
 - Provide housing stock to support the growing population of the Woollahra LGA (being a forecast increase from 58,964 in 2019 to 59,850 in 2036 and to 80,626 in 2056);
 - Provide employment-generating floor space to help reattract a working age population (those aged between 20-64 years) into the LGA (which is forecast to decline by 3% to 2036); and
 - Provide medical and well-being uses to support ageing in place for older persons in the LGA (22% increase in those aged 65 – 84 and 68% increase in those aged 85+).
- It has been subject to a broader environmental assessment (refer to **Section 8**). In particular, it has been determined that the existing infrastructure and services on the site (with augmentation) will be capable of supporting the future redevelopment of the site. Significant regional contributions are proposed to upgrade the interchange accesses, whilst local benefits and open space is also proposed.

7.2.2 Q4. Will the planning proposal give effect to a council's endorsed local strategic planning statement, or another endorsed local strategy or strategic plan?

Woollahra Local Strategic Planning Statement 2020

The Planning Proposal gives effect to several planning priorities of the Woollahra LSPS. Those most relevant are identified below.

It is also worth noting that findings from the preparation of the LSPS indicated that in relation to community sentiment, higher density development is more suitable to Edgecliff (over smaller centres such as Vaucluse, Bellevue, and Rose Bay) given its position to existing infrastructure while supporting the continuation of smaller, village-type suburbs in the locality. Consistent with this, the proposal will release pressure from these smaller villages to accommodate additional density and utilise existing and suitable land for higher order development.

Infrastructure and collaboration

- *Planning Priority E1: Planning for integrated land use and transport for a healthy, connected community, and a 30-minute city*
- *Planning Priority E2: Planning for a community supported by infrastructure that fosters health, creativity, cultural activities, and social connections*
- *Planning Priority E3: Working in collaboration with our community, government, businesses, and organisations*

The Planning Proposal is consistent with Planning Priority E1, E2 and E3 as it:

- Represents a transport orientated development of scale with integrated land uses in a centre and adjacent to a railway station;
- Will support an increased portion of people living with easy walking access to a range of jobs, services and facilities, as well as access by bus to other nearby activity centres and by train to other centres;
- Will, through the size and scale of the site and length of frontage, improve the existing adjoining public domain and provide for a more comfortable and attractive walking environment for people of all capabilities;

- Will, through the open space and public domain inclusions and medical/well-being uses proposed, contribute to the community which can foster health and support social connections; and
- Through the diversity of land uses and public spaces, and the activation and critical mass this provides, contribute to place making within the heart of Edgecliff.

Liveability

- *Planning Priority E4: Sustaining diverse housing choices in planned locations that enhance our lifestyles and fit in with our local character and scenic landscapes*
- *Planning Priority E6: Placemaking supports and maintains the local character of our neighbourhoods and villages whilst creating great places for people*

The Planning Proposal is consistent with Planning Priority E4 and E6 as it:

- Provide a greater amount and choice of new homes in a mixed use, transit-oriented form within a centre aligned with a train station. Combined with an improved public domain outcome and mix of uses, it will improve placemaking and social interactions.

Productivity

- *Planning Priority E7: Supporting access to a range of employment opportunities and partnerships*
- *Planning Priority E8: Collaborating to achieve great placemaking outcomes in our local centres which are hubs for jobs, shopping, dining, entertainment, and community activities*

The Planning Proposal is consistent with Planning Priority E7 and E8 as it:

- Will support commercial floor space which given the local centre zoning, can support a range of employment uses. This will support the retention and diversification of local employment opportunities; and
- Collocate medical/well-being and business uses within a public domain filled with fine-grain retail to create a more interconnected environment to support placemaking.

Sustainability

- *Planning Priority E13: Improving the sustainability of our built environment, businesses, and lifestyles by using resources more efficiently and reducing emissions, pollution, and waste generation*

The Planning Proposal is consistent with Planning Priority E13 as it:

- Provides a more sustainable form of development (transit orientated development) compared to more dispersed growth options;
- Like mentioned above, it will support a more ecologically sustainable development on the site with strong NABERS and Greenstar ratings. The scale of the site and proposal provides the opportunity to provide innovative, best practice and tangible measures that would be likely less viable as part of smaller scale renewal.

Woollahra 2030 – The Woollahra Community Strategic Plan

Woollahra 2030 was adopted by Council on 18 June 2018. It represents the long-term vision for the Woollahra community and identifies the LGA's current and future environmental, social, economic and civil challenges and aspirations.

The Community Strategic Plan is based on five (5) themes. Each theme is supported goals and strategies to support the achievement of these goals. Those in which are supported by this planning proposal are identified in **Table 5**.

Table 5 – Applicable themes and actions in the Woollahra Community Strategic Plan

Theme	Goal	Strategy	Comment
Community wellbeing	A connected, harmonious and engaged community for all ages and abilities	Provide places and spaces for people to connect and interact	The planning proposal provides significantly improved communal and public open spaces for social interaction, supported by access to services, transport and fine-grain retail.
Quality places and spaces	Well planned neighbourhoods	Enhance the form and function of the local business centres	The proposal will elevate the existing function of the local centre through an expansion of commercial, medical/well-being and residential floor space, supporting an increase in local jobs and daily critical mass to support the vitality of the centre.
Local prosperity	Community focused economic development	Encourage vibrant and vital local suburbs, villages and neighbourhoods that support a healthy economy	
A healthy environment	Sustainable use of resources	Reduce greenhouse gas emissions and ecological footprint	The proposal aims to provide a more ecologically sustainable development on the site. It will support development with a target of achieving a NABERS Energy rating of 5 stars, a 4 Star NABERS Water rating and a Greenstar rating of 6 stars

Draft Woollahra Integrated Transport Study

The Draft Woollahra Integrated Transport Study (ITS) articulates Council's policy for transport and sets a vision for a more sustainable and accessible LGA.

The themes and objectives of the ITS which are aligned with this Planning Proposal are set out below.

- Access, Mobility and Liveable Spaces (Theme 1). The proposal supports intermodal access from the public domain to the existing Edgecliff Railway Station and bus interchange which will be permeable and DDA compliant. This is also intended to align with the medical and wellbeing uses proposed on the site.
- Public Transport (Theme 2). The proposal will bring homes closer to existing transport infrastructure and will increase the ease and improve the experience of intermodal travel which overall will support increased public transport patronage in the LGA (Objective 6.1).
- Active Transport (Theme 3). The proposal will include bicycle parking. Combined with Council's policy commitment to investing in and building safe, accessible and attractive pathways and cycleways, this will ensure the site can support active transport in the LGA (Target 7.2).
- Roads and Parking (Theme 4). The proposal will create a concentration of jobs, homes and services which will reduce demand for travel across the LGA, supporting the need for private vehicle ownership (Target 8.2).

7.2.3 Q5. Is the Planning Proposal consistent with applicable State Environmental Planning Policies?

Yes. An assessment of the planning proposal against relevant State Environmental Planning Policies (SEPPs) is set out in **Table 6**.

Table 6 - Consistency with State Environmental Planning Policies

SEPP	Consistency		N/A	Comment
	Yes	No		
State Environmental Planning Policy No 55—Remediation of Land	✓			SEPP 55 will be considered during the detailed design of the proposal. Recent amendments to SEPP 55 has removed the need for the SEPP to be considered at the Planning Proposal stage.
State Environmental Planning Policy No 64—Advertising and Signage			✓	Not relevant to proposed amendment. May be relevant to future development applications applicable to the site.
State Environmental Planning Policy No 65—Design Quality of Residential Apartment Development	✓			The residential component of the Indicative design proposed under this Planning Proposal has been subject to assessment against SEPP 65 and the Apartment Design Guide to demonstrate that development for residential purposes on the site can generate appropriate residential amenity (refer to Appendix A). Any future detailed development on the site for residential

SEPP	Consistency		N/A	Comment
				purposes will be subject to reassessment against SEPP 65 and the Apartment Design Guide.
State Environmental Planning Policy (Affordable Rental Housing) 2009			✓	Not relevant to proposed LEP amendment.
State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004			✓	Not relevant to the proposed LEP amendment. Any future detailed design will be subject to this SEPP so as to ensure sustainable residential development.
State Environmental Planning Policy (Exempt and Complying Development Codes) 2008			✓	Not relevant to proposed LEP amendment. May apply to future development on the site.
State Environmental Planning Policy (Infrastructure) 2007	✓			- Division 17 of the Infrastructure SEPP will apply to the proposal as it will exceed 10,000 sqm of commercial (retail) floor space. Any application for development will need to be referred to the RMS. It also includes more than 75 residential apartments with access to or from a road within access to a classified road (within 90m). - The site is also located in an existing rail corridor. Division 15 of the Infrastructure SEPP will apply, and concurrence will be required by Transport for NSW prior to the determination of the detailed DA.
State Environmental Planning Policy (State and Regional Development) 2011	✓			Part 2 of the State and Regional Development SEPP will apply to the proposal as it will have a capital investment value in excess of \$30 million and is located in a rail corridor. More specifically, any future application for development will be classified as State Significant Development because it involves development within a rail corridor or associated with railway infrastructure that has a capital investment value of more than \$30 million for the purposes of residential accommodation and commercial premises.
Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005	✓		✓	The proposal is applicable to and is consistent with the Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005 (SREP 2005). - The SREP 2005 applies to land identified within the Sydney Harbour Catchment. The land is identified within the Sydney Harbour Catchment under the Sydney Harbour Catchment Map (Amendment 2016). - The Planning Proposal is considered consistent with the aims of the SREP 2005. Notably, it does not adversely impact the catchment, foreshores, waterways and islands of Sydney Harbour, their recognition, protection, enhancement or maintenance. - The Planning Proposal is consistent with Part 2 Planning Principles. - The Planning Proposal is consistent with the matters for consideration, in particular clause 26 which relates to the maintenance, protection and enhancement of views. The built form envelope envisioned under the Planning Proposal has been designed to maximise views to and from Sydney Harbour and its landmarks and the public domain through a slimmer and angled tower typology (refer to Section 6.4).

7.2.4 Q6. Is the planning proposal consistent with applicable Ministerial Directions (s.9.1 directions)?

An assessment of the planning proposal against applicable section 9.1 Directions is set out in **Table 7** below.

Table 7 – Consistency with section 9.1 directions

Direction	Consistency		N/A	Comment
	Yes	No		
1. Employment and Resources				
1.1 Business and Industrial Zones	✓			This direction is applicable because the site is located in a business zone (B2). This planning proposal gives effect to the directions of this direction because:

Direction	Consistency		N/A	Comment
				- It will provide a suite of medical/well-being and commercial (including retail and potential co-working spaces) uses which will support employment growth on the site. The site is considered suitable because it is highly accessible, adjacent to the Edgecliff Railway Station and directly adjoining the Edgecliff bus interchange; - Does not seek to remove (only expand) commercial floor space, ensuring commercial floor space is protected in the B2 zone; and - Does not seek to remove or change the area and location of the B2 zone; - It will support the viability of the Edgecliff Centre by: - Allowing it to accommodate a greater quantity and standard of commercial floor space, increasing its ability to accommodate local jobs; and - Through additional job and housing creation, provide for additional daily critical mass to sustain the vitality of other services in the Edgecliff centre.
1.2 Rural Zones			N/A	This direction is not applicable.
1.3 Mining, Petroleum Production and Extractive Industries			N/A	This direction is not applicable.
1.4 Oyster Aquaculture			N/A	This direction is not applicable.
1.5 Rural Lands			N/A	This direction is not applicable.
2 Environment and Heritage				
2.1 Environmental Protection Zones			N/A	This direction is not applicable.
2.2 Coastal Protection			N/A	This direction is not applicable.
2.3 Heritage Conservation	✓			The objective of section 9.1 direction 2.3 is to conserve items, areas, objects and places of environmental heritage significance and indigenous heritage significance. There are no listed heritage items on the site of this Planning Proposal. Refer to Section 8.9 for further discussion regarding Heritage. Overall, the proposal will not undermine the achievement of this direction. Existing legislation will remain in place to ensure the conservation of heritage.
2.4 Recreational Vehicle Area			N/A	This direction is not applicable.
2.5 Application of E2 and E3 Zones and Environmental			N/A	This direction is not applicable.
2.6 Remediation of Contaminated Land				Given the recent amendments to SEPP 55, Contamination is not required to be considered at the Planning Proposal stage but will be considered during detailed design.
3. Housing, Infrastructure and Urban Development				
3.1 Residential Zones	✓			The B2 zone allows significant residential development which is proposed. The residential component of the development: - Supports a variety of one, two and three bedroom units to support housing diversity, - Broadens the choice of building types through high-density residential accommodation; - Improves the location of housing, allowing accommodation in the heart of the Edgecliff Centre; and - Will be subject to detailed design to ensure it is of high-quality design.
3.2 Caravan Parks and Manufactured Home Estates	✓		N/A	This direction is not applicable.

Direction	Consistency		N/A	Comment
3.3 Home Occupations	✓			No change is proposed to the current permissibility of home occupations.
3.4 Integrating Land Use and Transport	✓			This planning proposal does not propose to create, alter or remove a zone or a provision relating to urban land, including land zoned for residential, business, industrial, village or tourist purposes. Notwithstanding, the planning proposal remains consistent with the objectives of the Direction as it: - Significantly improves access to housing and jobs by public location give its proximity to Edgecliff Railway Station and bus interchange; - Increases choice in in-proximity public transport (i.e. bus and rail), reducing the need for car dependence and reducing car-generated trips; and - Will contribute to a significant critical mass (i.e. residents, workers and visitors) to support the viability of rail and bus services.
3.5 Development Near Licensed Aerodromes	✓		N/A	This direction is not applicable.
3.6 Shooting Ranges	✓		N/A	This direction is not applicable.
4. Hazard and Risk				
4.1 Acid Sulfate Soil	✓			Under the Woollahra LEP, the site is located on land classified as Class 5 Acid Sulfate Soils. At the time of any future development application, the need for an Acid Sulfate Soils Management Plan will be addressed.
4.2 Mine Subsidence and Unstable Land			N/A	The site is not identified as mine subsidence or unstable land.
4.3 Flood Prone Land			N/A	The site is not located on land in a flood planning area.
4.4 Planning for Bushfire Protection			N/A	This direction is not applicable.
5. Regional Planning	✓		N/A	These Directions are not applicable.
6. Local Plan Making				
6.1 Approval and Referral Requirements	✓			This Planning Proposal is consistent with this Direction in that it does not introduce any provisions that require any additional concurrence, consultation or referral.
6.2 Reserving Land for Public Purposes	✓			This Planning Proposal is consistent with this Direction in that it does not create, alter or reduce existing zonings or reservations of land for public purposes.
6.3 Site Specific Provision	✓			The Planning Proposal will not result in any unnecessarily restrictive site-specific planning controls.
7. Metropolitan Planning				
7.1 Implementation of A Plan for Growing Sydney	✓			The Planning Proposal is consistent with the Metropolitan Plan, as discussed in this section.

7.3 Section C – Environmental, Social and Economic Impacts

7.3.1 Q7. Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

The Planning Proposal is unlikely to result in any impact on critical habitat or threatened species, populations or ecological communities or their habitats, given the site's urban location.

7.3.2 Q8. Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?

Section 6 of this report provides a preliminary environmental assessment. No unacceptable impacts are likely to result from the proposal and future development of the site.

7.3.3 Q9. Has the Planning Proposal adequately addressed any social and economic impacts?

The social and economic impacts of the proposal are addressed in **Section 8** of this report. The Planning Proposal will have a positive social and economic impact.

7.4 Section D – State and Commonwealth Interests

7.4.1 Q10. Is there adequate public infrastructure for the planning proposal?

Yes. An infrastructure and utility service assessment has been undertaken for the site. It determines that the existing infrastructure (water, telecommunications, sewage, and gas) will have adequate capacity to accommodate the proposal. Likely infrastructure augmentation / upgrades are also identified.

Specifically, the following is of note:

- In order to accommodate the proposal, two new onsite substations will likely be required;
- Two natural gas mains are located in the vicinity of the site. These are estimated to have adequate to support the proposal (subject to assessment and approval from the gas provider Jemena);
- Multiple telecommunications conduits are located along New South Head Road and McLean Street, and these are anticipated to have the carrying capacity to support the proposal;
- No major existing water services will need to be disconnected or diverted. The existing reticulation tee of the trunk main in New South Head Road will likely need upgrading to supply the proposal; and
- An existing gravity sewer (225mm) extends from the southern boundary of the site, across McLean Street and connecting to a sewer main at New McLean Street. It is considered to have enough existing capacity to serve the proposal.

The necessary consultation and approvals with the relevant public authorities and service providers will continue to progress in line with the ongoing design and development of the proposal. Notwithstanding, early consultation has already occurred with TfNSW and the Department of Planning, Industry and Environment.

7.4.2 Q11. What are the views of State or Commonwealth public authorities consulted in accordance with the Gateway determination?

The views of State and Commonwealth public authorities will be known once consultation has occurred in accordance with the Gateway determination of the Planning Proposal. However, it is noted that early engagement with key stakeholders including Transport for New South Wales have been positive given the improvements to the Transport Interchange.

Also, given the proposed height, referral to the Civil Aviation Safety Authority will likely be required in obtaining a height approval (by the Commonwealth Department of Infrastructure, Transport, Regional Development and Communications) for exceeding the OLS.

8.0 Planning Assessment

This section considers the key planning issues associated with the Planning Proposal as well as a high level consideration of associated environmental impacts which may arise with the future development of the site.

In establishing the Planning Proposal, an indicative development concept prepared by award-winning Architects FJMT has been prepared to ensure all relevant built form, amenity and design parameters have been considered, and to establish a reasonable scale and density for the future building on this particular site. Accordingly, the outcomes of these investigations and analysis have largely guided the content of this Planning Proposal and Indicative Scheme as relevant.

By adopting this approach, the built outcomes, and associated impacts of the Planning Proposal (and subsequent Development Applications to implement the vision presented for the site) can be tested, understood and clearly presented.

8.1 Built Form and Urban Design

8.1.1 Street Wall Height and Podium

The podium comprises three distinct elements (the street wall, and a podium which has different scales to respond to the street which are a contextual response to the prevailing street frontage heights and heights of surrounding development along New South Head Road.

The overall podium height will reach RL 95.00. The upper component of the podium is designed to replicate the height of Eastpoint Tower (180 Ocean Street) and the lower component of the podium is designed to align to the residential building at 170 Ocean Avenue. Given the heights and setback proposed, the podium avoids generating an undue sense of enclosure and scale to the public domain and respects the scale of existing development (refer to **Figure 35**).

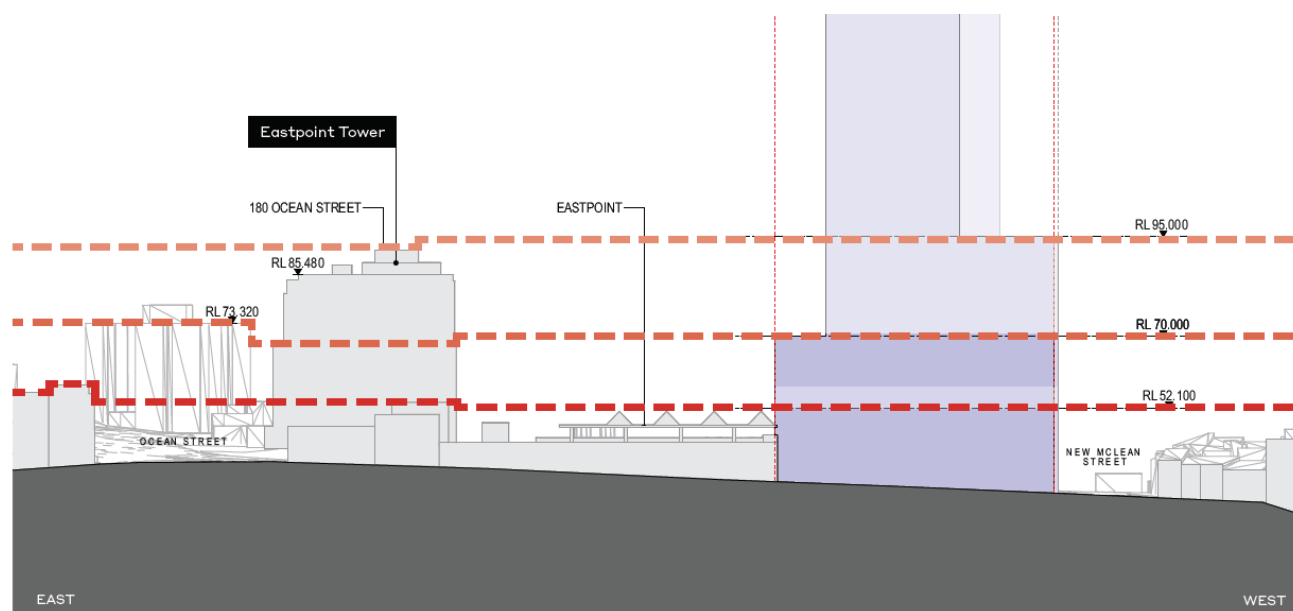


Figure 35 – Street frontage and podium heights fronting New South Head Road

Source: FJMT

8.1.2 Tower Form

The tower component extends up to 45 storeys (161m) and is setback 38m from New South Head Road and 12m from the eastern boundary of the site. The positioning of the tower form is based on:

- Sun access to Trumper Park Oval. The western setback (between 14.5m and 24.1m) and the angled articulation of the western façade ensures the Oval is not subject to overshadowing from 10:00am mid-winter (in accordance with the DCP control);
- A 12m eastern setback to ensure suitable building separation and privacy (for development over 25m) between the site and high-rise residential development to the east; and
- Consideration of view sharing for residents to the east looking back at the Sydney CBD and Harbour (refer to **Section 8.5** for further analysis). The building line of the envelope has been positioned to the southern end of the site and minimise its elevation length in the western view.

8.2 Suitability of Increased Density

As detailed throughout this report, the proposal has been thoughtfully designed, tested, and analysed having regard to the site and the various environmental constraints surrounding the site. It was then further refined and sculpted having regard to urban design principles and contextual analysis.

The result is a height and FSR achievable within the building envelope, which is the product of urban and architectural design testing and environmental analysis. This testing established the appropriate maximum building envelope in terms of its impacts and the site's environmental constraints (especially in relation to overshadowing and view sharing). From there, the building envelope was further refined to be capable of accommodating a higher density built form appropriate to the context.

The approach set out above is a fundamental shift away from the setting of a generic fixed height and FSR number in isolation of site and locality-specific environmental context and impacts. This approach recognises the unconstrained nature of the site, being a large and unrestricted lot in the heart of Edgecliff above the Eastern Suburbs Railway Line, adjacent to the Edgecliff Railway Station and Edgecliff bus interchange.

This approach is a more contextual approach and allows a more appropriate density (irrespective of numerical value) to be established on a site-specific basis, and which is the product of urban design responsiveness and environmental testing. In this instance, the density proposed provides an appropriate environmental outcome and supports a strong contextual response to Edgecliff Centre and in response to the principles of transit oriented development.

The physical characteristics of the site and its location also require consideration. The site represents a single large lot under single ownership. It does not have any significant environmental planning constraints and like mentioned above, sits adjacent to the Edgecliff Railway Station and Edgecliff bus interchange within the heart of the Edgecliff town centre. At the strategic level, a number of planning priorities when read together support the investigation of the renewal of the Edgecliff Centre and the site. These focus on the integration of land use and transport through the provision of a greater amount, choice and affordability of homes in locations such as Edgecliff that have access to jobs, services and public transport.

At present, the Edgecliff Centre is a medium rise office building with active uses at the street-facing ground floor built in the 1970s. Given its attributes and opportunities mentioned, this represents an underutilisation of the site and results in poor urban design outcomes.

Accordingly, adherence to predetermined densities based on generic assumptions alone should not inhibit the development potential of a site which is latent, highly optimal and unconstrained, and can clearly deliver on the vision set out in the Region and District Plans for Edgecliff. A more optimal site or a site with the same favourable attributes may take significant time to materialise (if ever given the pattern of land ownership in Edgecliff).

Further, the density proposed is intended to provide a mix of employment-generating land uses and diverse housing options to support housing demand, the growing population of the LGA, and ageing in place. Under the LSPS, Edgecliff is identified as being important to local productivity and the site is perfectly placed and suitable to accommodate these mixed-uses with the density proposed to provide the required amenity in an otherwise constrained urban setting.

The proposed density is also considered appropriate having regard to the height and floor space objectives of the Woollahra LEP, as elaborated below.

8.2.1 Height objectives – clause 4.3 of the Woollahra LEP

(a) to establish building heights that are consistent with the desired future character of the neighbourhood,

Part D4, Section 2.2 of the Woollahra DCP sets out the *desired future character* for the Edgecliff Centre is. Each element of the *desired future character* statement is addressed in **Table 8**.

Table 8 – Consistency of the proposal against D4.2.2 Desired future character of the Woollahra DCP

Desired Future Character	Comment	Consistent
<i>The Edgecliff Centre will reinforce its role as the focus of retail and business activity and continue to be convenient place for people to meet, work, shop and use services.</i>	The proposal includes a suite of non-residential uses (protected by a minimum non-residential floor space provision) to support ongoing employment generating land uses and service provision on the site. It also proposes public domain spaces to support informal meetings and social interaction. This will ensure the site maintains a strong retail and commercial focus.	YES
<i>The built form will promote an urban environment which meets high standards of visual quality and pedestrian amenity.</i>	The built form capable under the proposed envelope will allow a tiered podium and slender tower form. Building mass has been designed and positioned on the site to respond to the existing built form typology surrounding the site, to support visual quality and visual integration of the proposal within the surrounding built form context. In particular, the street wall height is intended to better align with the adjoining Eastpoint frontage heights, and the podium heights replicate the existing heights of 170 and 180 Ocean Avenue. The tower form is setback from the primary frontage, consistent with the existing residential tower apartment building typologies in the area whereby towers are set back from the main street. Pedestrian amenity is created through the retail laneway, publicly accessible plaza, through-site link, and sky park.	YES
<i>Buildings will be up to eight storeys on New South Head Road and transition down to one to two storeys at New McLean Street frontage. At the corner of Ocean Street and New South Head Road buildings up to 10 storeys are permitted.</i>	The proposal exceeds eight storeys on New South Head Road, though a seven storey podium is proposed which in part responds to this objective. The site-specific characteristics of the site and its strategic context does however demonstrate the appropriateness of additional density on the site. An eight storey street wall height fronting New South Head Road would also be at odds with the predominant two storey street wall heights along the same road.	NO
<i>New McLean Street will have an active street frontage and parking and servicing arrangements will be reconfigured to be less visually intrusive. The amenity will be improved by including streetscape works, landscaping and reducing the frontage dedicated to vehicle movements</i>	The proposal will replace the currently inactive frontage of New McLean Street with retail tenancies and a residential lobby. Servicing will be via the rear of the site, away from the active frontages, reprioritizing the western boundary of the site for pedestrian use.	YES
<i>Pedestrian links across the centre, and through the centre to the bus interchange and railway station, will be enhanced. The connections to the surrounding New South Road commercial corridor and nearby residential land will increase pedestrian activity and convenience. Where commercial development addresses a street, awnings will be provided at street level for weather protection.</i>	New vertical connections and a through-site link will support enhanced pedestrian permeability to and within the centre. Active frontages will New South Head Road and New McLean Street will likely be capable of incorporating awnings (subject to detailed design).	YES
<i>Given the excellent public transport access, the centre is ideally located for increased residential and commercial land uses. Retailing, medical and health related services and professional services will continue to cater for the needs of the local community.</i>	The site sits adjacent to the Edgecliff Railway Station and Edgecliff Bus Interchange. It is difficult to identify a more suitable site to increase residential and commercial capacity side the Edgecliff Centre given the constraints of the ownership of the Eastpoint Shopping Centre (preventing redevelopment). Retail, wellbeing and medical uses form the suite of employment-generating floor space which will cater to the needs of local residents.	YES

The assessment above demonstrates that the *desired future character* of the Edgecliff Centre is not centred solely around height and really reflects a similar environment to that currently in place. Given that Council has a desire to review the planning controls for Edgecliff, it would be assumed this desired future character is outdated compared to future expectations for the Edgecliff Centre and broader local centre.

Notwithstanding, the *desired future character* statement considers a range of matters ranging from land use to pedestrian amenity which have been considered in this Planning Proposal.

Although the height proposed exceeds eight storeys (which is the height anticipated for development fronting New South Head Road), it does not preclude the proposal from satisfying the large majority the desired future character requirements of the DCP. In addition, a seven storey podium is proposed which responds to this objective. Given Council are reviewing the Edgecliff Centre controls in any event, it is assumed this character statement is in need of updating and that the Edgecliff Centre DCP (associated with this Planning Proposal) will provide updated character objectives.

(b) to establish a transition in scale between zones to protect local amenity

The incorporation of podium scales with higher density built form above is an appropriate method to modulate density and deliver a transit oriented development. The proposal is also well setback from its southern boundary by virtue of the existing road reserve and street buffers. The height and form of the podium also provides a compatible transition to 170 and 180 Ocean Street located to the south-east.

Reducing the height on the site would on face value create a more gradual height transition but it would not be the best approach in protecting the local amenity of development surrounding the site. The intent of a taller slimmer built form is to take mass away from the lower levels (which impacts a greater number of views from 170 and 180 Ocean Avenue), and reduce the extent of shadow for residential development and Trumper park to the south. **Section 4.4** has already demonstrated what the impacts would be for a development up to 17 stories or 30 stories being lower in height but a worse outcome.

The proposed scheme also responds to its urban context with a built form that is set back by approximately 38m from New South Head Road. This is consistent with the existing built form in the area (refer to **Figure 36**).

(c) to minimise the loss of solar access to existing buildings and open space,

The proposed slender tower form casts a fast-moving shadow, reducing overshadowing impacts to residential development to the south. A shorter, bulkier height and form would increase the width of shadow cast to the south, causing residential land to the south to be shadowed for longer. The proposal also does not overshadow Trumper Park between 10:00am and 2:00pm in mid-winter.

(d) to minimise the impacts of new development on adjoining or nearby properties from disruption of views, loss of privacy, overshadowing or visual intrusion

The proposal is consistent with objective (d) for the reasons already set out in this report:

- The envelope is designed to respond to view sharing principles for residents at 170 and 180 Ocean Avenue. The podium is setback and lowered at the lower levels to reduce the amount of bulk obscuring views at the lower levels. The overall building is then cut back and angled on the western side to maximum views and ensure there is no overshadowing to Trumper Park during the DCP control hours.
- Having a taller, thin tower creates a slimmer and fast moving shadow which reduces the extent and duration of shadow cast on residential development to the south. Reducing the height would distribute bulk across the site and cause a wider, slower moving shadow.
- The eastern boundary is approximately 80m from the Eastpoint residential tower to the east. This physical distance combined with an additional 12m (ADG compliant) setback will limit privacy and visual intrusion.

(e) to protect the amenity of the public domain by providing public views of the harbour and surrounding areas.

The Visual Impact Assessment identifies a range of public domain locations from where the proposal is likely to be visible (including areas which have views of the Harbour). It determines that view from the public domain outside the site would not be significantly affected by the proposal, and no significant view loss will occur (refer to **Appendix H**).

8.2.2 Floor space ratio objective – clause 4.4 of the Woollahra LEP

(b) for buildings in Zone B1 Neighbourhood Centre, Zone B2 Local Centre, and Zone B4 Mixed Use—to ensure that buildings are compatible with the desired future character of the area in terms of bulk and scale

As detailed in **Section 8.2.1**, the desired future character for the Edgecliff Centre is established by the DCP. There is no specific mention of a desired bulk and scale of development. It therefore provides less guidance in specifying what bulk and scale would satisfy the desired future character of the Edgecliff Centre.

Again, height (eight storeys) is mentioned in the desired future character statement, but bulk and scale responds to more than just height. Bulk and scale relates to the positioning, distribution, and articulation of building mass on a site, and how it is perceived from the public domain. The numerical height (and floor space) alone does not determine bulk and scale. Rather, it's how this height is translated on to a site (i.e. where and how it is positioned) which determines its bulk and sale, and ultimately, how it sits within the public domain.

Given the lack of specific guidance given by the DCP on the desired future character of the area in terms of bulk and scale, the proposal has relied on distributing mass on the site (i.e. a lower podium and setback tower) which would allow the street wall and podium to reach a height more consistent with existing heights along New South Head Road, and allow the overall building to respond to the same apartment building typology in the area (i.e. a tower element above podium setback from the street frontage). This ensures the bulk and scale of the proposal is not excessive and not dissimilar to the typology of New South Head Road, which ensures a degree of consistency in character.

8.2.3 Density in other Centres

Council, in the pre-application response (**Appendix C**), have requested a comparison of density (height and floor space) of the proposal to the density available in Bondi Junction and the Sydney CBD.

A mere two-dimensional comparison of height and FSR numbers across three different centres misconstrues some of the complexities and nuances of planning height, bulk and scale in an effective responsive form. It does not appropriately consider the very different contextual and site-specific characteristics of the site, Bond Junction, and the Sydney CBD. In particular:

- The site is the only remaining large and unconstrained portion of land in the Edgecliff Centre. It also sits above and adjacent to the only interchange in Woollahra in a setting which has a very different character to the rest of the LGA;
- Spatially, Bondi Junction has a large commercial and mixed centre which provides numerous opportunities for redevelopment and the more level distribution of density across a number of different development sites. Conversely Edgecliff has minimal development sites capable of accommodating such rises in density.
- Also, the LEP controls for Bondi Junction came into force in 2012. This predates Bondi Junction's designation as a Strategic Centre (under the current Region and District Plan) by eight years. A height limit of 60m does not therefore necessarily reflect the appropriate height for a Strategic Centre, with planning for transit orientated developments in such close proximity to the CBD having progressed significantly in the last decade. For these reasons an analogous comparison to Bondi Junction is not considered appropriate as a reason to cap Edgecliff Centre.
- The Sydney CBD is Australia's primary economic centre and plays a significant role in the regional and national economy. It generates \$130 billion in economic activity annually (which is over 7% of the total national economy)⁴. It also includes nearly 13,000 business, 340,000 employees and 31,600 residents. Density controls in the CBD need to provide development which can support this capacity and encourage development which can future-proof the CBD's competitive advantage. In earnest, the Sydney CBD controls are upon examination far in excess of what is proposed in this Planning Proposal.

A detailed consideration of pre-application comments is set out below.

⁴ Planning Proposal: Central Sydney February 2020, City of Sydney Council

Council comment – Height

The proposed building height control represent a building height of approximately 161.75 - 167m above ground level. A comparison of the proposed building height to other approved building height controls show that the proposed control is:

- *substantially greater than the current highest maximum building height of 34m permitted under the Woollahra LEP 2014*
- *substantially greater than the maximum building heights of 60m permitted under Waverley Local Environmental Plan 2012 at Bondi Junction, which is designated as a strategic centre in the Regional Plan and District Plan*
- *greater than the majority of maximum building heights permitted under Sydney Local Environmental Plan 2012 in the Sydney CBD, which is designated as a metropolitan centre in the Regional Plan and District Plan.*

Response

In response to point one and in order to achieve the vision for the site, the current maximum permitted height under the Woollahra LEP needs to be exceeded. Development up to 34m is simply not feasible and does not provide any uplift compared to the current development on the site.

We also note that Council in their LSPS have identified that the two key Local Centres of Double Bay and Edgecliff require planning intervention to support the renewal of both centres which could only be achieved with development uplift. It is further noted that building heights above 34m were previously identified as part of the opportunity study from 2010.

Further, 34m does not reflect a height the site can accommodate in terms of environmental impact and does not speak to the strategic designation of Edgecliff as a 'Key Local Centre' and transport interchange capable of accommodating transit orientated development and renewal. In addition, a 34m height limit would not:

- promote the efficient use of land and allow additional height appropriate to a location directly adjacent public transport;
- promote a density which limits the ability to accommodate new uses feasibly and practically with other employment-generating uses to create a truly mixed-use, accessible development;
- contribute feasibly and meaningfully to upgrades to the existing railway station and the development's connectivity to the adjoining bus interchange; and
- Best respond to the one remaining large lot within the Centre which is not subject to constrained ownership (i.e. stratum).

In relation to point two and like previously touched on above, due to larger land areas and lot configurations, height in Bondi Junction can be distributed across a greater commercial and mixed use centre which allows greater density at lower overall heights. Given the smaller size of the Edgecliff Centre site (compared to Bondi Junction) and the very limited number of large developable lots within Edgecliff, there is limited opportunity to supply and distribute density. Edgecliff is therefore not directly analogous and a simple comparison of blanket FSR standards between Bondi and Edgecliff does not sufficiently canvas the appropriateness of built form on the Edgecliff Centre site.

It is critical to note that the planning framework for Bondi was adopted as part of the Waverley LEP 2010 (Bondi Junction) which has now been superseded by the current Waverley LEP 2012. Both instruments predate the current Greater Sydney Plan. The uniform height and FSR standards for Bondi (in addition to the existing cadastre of Bondi which comprises of large development blocks) encouraged a building typology of broader and bulkier buildings limited to a height of 60 metres which is apparent with the existing building form of the skyline of Bondi Junction.

The framework for Bondi does not reflect the evolution of planning in centres over the last decade which contemplates developments of narrower and slender building forms which promotes sustainability, enhanced environmental outcomes and better design quality. This is evident through emerging centres which support Transit Orientated Development including Waterloo, Crows Nest, St Leonards, and centres along the North West Metro line.

The site is the only large unconstrained lot in the Edgecliff Centre. It is appropriately located (above and adjacent to public transport) to support additional height and can accommodate this height in a sensitive manner so as to ensure impacts to surrounding receivers are reduced. Key design moves adopted as part of the design principles established for the site ensures that the strategic siting of building form and the tower typology is compatible with tower forms along Darling Point and will not adversely generate undue environmental impacts with respect to shadows, views and vistas, compatibility with the nearby heritage conversation area and privacy and overlooking.

In relation to point three, the 'maximum building heights' identified by Council are not the maximum available and, in many cases, operate as 'base' heights available to land in the Sydney CBD. These base heights range up to 235m which can achieve additional height through the completion of a competitive design process (which allows 10% height bonus).

Many sites in the CBD are not given a height limit and are restricted only by either sun access planes to protect overshadowing to public open spaces in the CBD, or the obstacle height limitation surface, both of which can exceed the height of the proposal.

Further, the City of Sydney Council is currently in the process of introducing its ground-breaking *Central Sydney Planning Strategy* (exhibited between 1 May to 10 July 2020) which sets a new strategic direction to continue to position and strengthen Sydney as Australia's leading global city. The Strategy includes LEP amendments which supports a design excellence process to support 50% more height in certain tower cluster areas in Central Sydney which can support development up to 300m.

Council comment – Floor Space

A comparison of the proposed FSR with other FSR development standards in the Woollahra LGA and in major centres in other LGAs shows that the proposed control is:

- *substantially greater than the current maximum FSR of 4:1 permitted under the Woollahra LEP 2014*
- *greater than the maximum building heights of 8:1 permitted under Waverley Local Environmental Plan 2012 at Bondi Junction, which designated as a strategic centre in the Regional Plan and District Plan*
- *greater than the base FSR permitted under Sydney Local Environmental Plan 2012 in the Sydney CBD, which is designated as a metropolitan centre in the Regional Plan and District Plan*

Response

The response to point one is similar to that mentioned for height. In order to achieve the vision for the site, an FSR above 4:1 is warranted, particularly given its accessible location. An FSR of 4:1 on the site given its ability to provide a genuine transport-orientated development, directly responding to the only interchange in Woollahra, would be a complete underutilisation of the site. It is also prudent to note that the preceding opportunity study recommended an FSR of 6.05:1 which included predominately residential uses. The proposed scheme responds to this and provides a residential FSR of approximately 6:1, but further complements the transit orientated development by including a minimum of 3:1 for non-residential employment-generating uses. Rather than providing a narrow 6:1 FSR residential scheme, the proposal includes a variety of uses for community and public benefit without undue environmental impacts.

In relation to point two, the proposed FSR on the site (9:1) is comparable and not significantly different to what is available in Bondi Junction (8:1). Further, it is noted that the FSR of 8:1 for Bondi Junction does not encompass a minimum non-residential FSR component as proposed with this Planning Proposal. The proposed FSR reflects a density which can feasibly and appropriately be placed on the site and in response to a Station and Transport Interchange located less than 4 minutes from the CBD, arguably better located than Bondi Junction.

Bondi Junction also adopts a consistent approach to density which reflects a more uniform and established way of allocating density across a centre. It does not consider the capacity of each site and the density it can or cannot appropriately accommodate. The proposal on the other hand reflects a more contemporary approach to density allocation based on what the site can actually and appropriately accommodate. It supports an acceptable environmental outcome to surrounding receivers and supports a tower typology which is not inconsistent with the typology of towers already on the Darling Point Peninsula.

In relation to point three, the proposal does exceed the general 'base' FSR for land within the Sydney CBD (8:1). This base acts as the starting point for the cumulative FSR scheme which operates in the CBD and which is deliberately designed to incentivise development over the base FSR.

The Central Sydney Local Environmental Plan 1996 first introduced the award for what is known as 'accommodation floor space'. It allows additional floor space (above the base) and was originally devised to incentivise commercial and residential floor space. The same still system applies under the current LEP and dependent on your location within the CBD, development can achieve accommodation floor space anywhere from 1.5:1 to 6:1 FSR (above the base).

If the proposal for example was located in the centre of the Sydney CBD (say near Town Hall), under the Sydney LEP it would be eligible for a base FSR of 8:1 and accommodation floor space of 6:1 for residential or hotel. Development over 55m will require a competitive design process (which after its successful completion) awards a 10% bonus in FSR (or height). The development would therefore have a permitted FSR of up to 15.4:1. There is also additional FSR available for certain functions including the provision of end of trip facilities, reduced car parking, and entertainment and club floor space (amongst other things). Put simply, the base FSR of 8:1 is not the measure of actual FSR available to development in the Sydney CBD.

8.2.4 Transit Orientated Development

For many years now, the NSW Government has sought to grow high-value jobs and provide better access to homes and employment, and create liveable and sustainable centres. This strategy has translated into the successful increase in density around existing and proposed public transport, including over-station developments. This thinking in planning has advanced significantly since the controls for Bondi Junction (for example) were first envisaged over a decade ago.

St Leonards is a prime example. It has seen a significant increase in density to land surrounding the existing train station and metro station. Height in St Leonards reaches up to 50, 45, 42 and 35 storeys with FSR as high as 25.4:1, 20:1, 18:1 and 15:1. This has been solidified in the recent St Leonards and Crows Nest 2036 Plan (finalised in August 2020). Like Edgecliff is to the Sydney CBD, St Leonards is also only two stops away from the North Sydney CBD and three from the Sydney CBD.

Edgecliff is similar in locational advantage to St Leonards and Crows Nest, where densities of this scale have been deemed appropriate by recent State Government work. Where Edgecliff differs is the *highly limited number of sites suitable for the scale* of transit oriented development, with the Edgecliff Centre having the size and proportions and being the only real site capable of delivery of a transit oriented development within the centre.

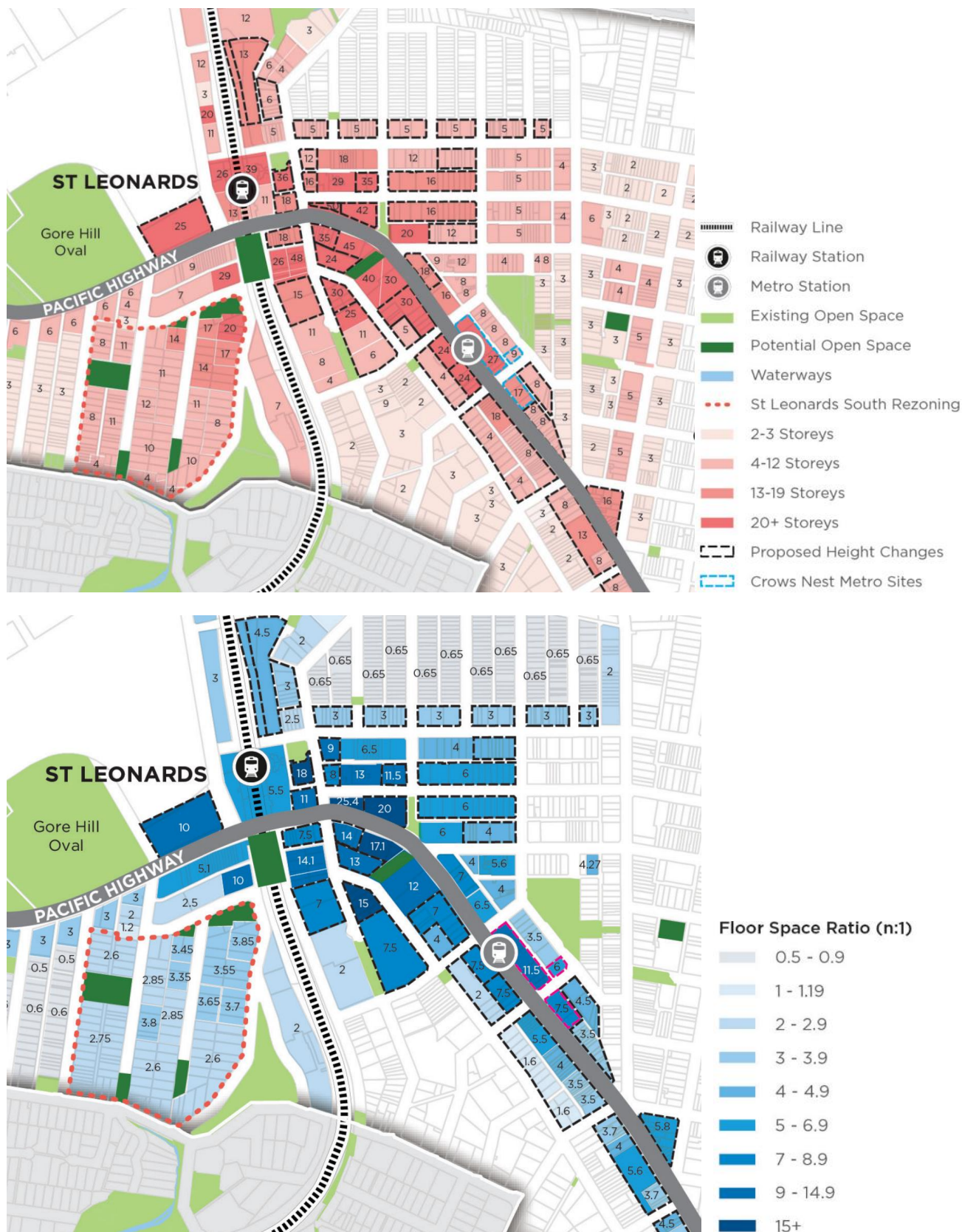


Figure 36 – Height and floor space surrounding St Leonards Railway Station Metro Station

Source: St Leonards Crows Nest 2036 Plan, NSW Department of Planning, Industry and Environment

The same can be said for the following centres that are capable of supporting transit orientated development such as:

- Epping (which permits up to 72m and 6:1 FSR);
- Chatswood (which permits heights up to RL 246m, RL 234m, RL 201m and RL 175m with corresponding FSR's of 8:1, 7:1, 6:1 and 5.5:1);
- Waterloo Metro Quarter which has and will continue to leverage of existing and planned infrastructure with heights up to RL 116.9, RL 104.2 and RL 96.9 with a corresponding FSR of 6:1. With a site area of approximately 13,500 sqm, this allows a GFA of up to 81,000 sqm which is significantly higher than the GFA proposed in this Planning Proposal.
- The Sydney Metro Northwest Urban Renewal Corridor (which includes eight station precincts from Cherrybrook to Cudgong Road) also demonstrates a commitment to increasing density with infrastructure.

8.3 Landscape and Public Domain Concept

A high-quality landscape and public domain outcome is central to achieving the objectives for the site's redevelopment. A preliminary concept to assist in establishing the key principles to be adopted and developed within the Planning Proposal and the future detailed design phase has been established by Longhurst, FJMT and Ethos Urban.

Included at **Appendix A** is a concept plan prepared by FJMT for the ground plane. The key features include:

- Upgraded entry experience and activated frontage from New South Head Road to the Edgecliff Railway Station;
- New public square at ground level with attractive fine-grain laneway retail; and
- Enhanced intermodal circulation from the train concourse to the bus terminal within a naturally lit atria connecting the public plaza to the public accessible green space;
- Highly accessible public open green space adjoining the bus terminal, improving and expanding the existing public realm for the wider community, and connecting this to the amenity of the Edgecliff Centre and East Point Centre and by virtue of the interchange the wider LGA.

8.4 Overshadowing

Overshadowing caused by the concept envelope has been assessed against:

- Solar access to Trumper Park Oval between 10:00am and 2:00pm on 21 June (control C26 of the Edgecliff DCP); and
- Solar access to existing adjoining residential dwellings for a period of two hours between 9:00am and 3:00pm on 21 June to north facing windows of habitable rooms, and for a minimum of two hours to 50% of the private open space (control C27 of the Edgecliff DCP).

8.4.1 Overshadowing to Trumper Park Oval

FJMT has undertaken modelling to determine the shadow cast generated by the concept envelope on Trumper Park. The assessment identifies that between 10:00am and 2:00pm, the envelope and indicative scheme does not cast any shadow over Trumper Park Oval in accordance with the requirements of the DCP (refer to **Figure 37**).

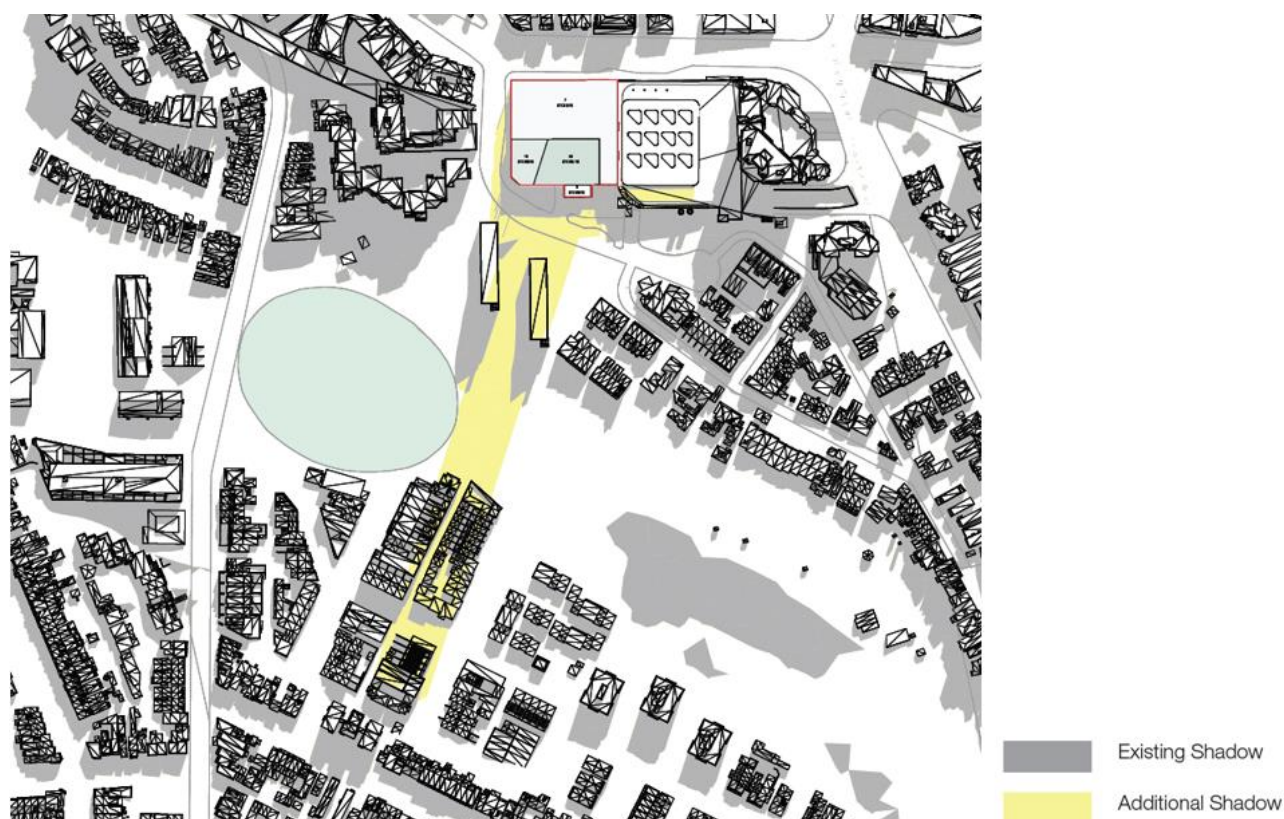


Figure 37 – Shadow cast by indicative envelope at 21 June – 10am (left), 11:00am (right)

Source: FJMT

8.4.2 Solar Impacts to Adjoining Properties

FJMT have prepared a solar access analysis to determine if the proposed envelope results in solar impacts to the surrounding residential properties. The analysis relates to the period between 9:00am and 3:00pm during the winter solstice on 21 June.

Chapter D4 of the DCP specifies that buildings be designed to ensure that adjoining residential development receive at least 2 hours solar access between 9am and 3pm on 21 June to existing north facing windows of habitable rooms. Consistent with the DCP requirement, the analysis (**Appendix A**) demonstrates that with the proposed envelope and indicative scheme, the adjacent residential dwellings to the south and south east will receive 2 hours or more of solar access during the nominated time period.

8.5 View Sharing and Visual Impact

Richard Lamb and Associates (**RLA**) has prepared a Visual Impact Assessment (**VIA**) to determine the visual impact of the proposal from the public domain and in relation to view sharing with adjoining residential development. The VIA considers the principles of *Tenacity*, as well as the viewpoints identified in Part D of the Woollahra DCP. The conclusion reached by RLA is that the overall level of visual impact varies from low to moderate but is acceptable on balance.

8.5.1 Private Domain Views

Potential impacts caused by the proposal on view sharing on surrounding residential receivers was assessed at the strategic level. Given the location of the site and the location of scenic views to the west and north, the main buildings to consider are those east of the site, particularly the Eastpoint Tower (180 Ocean Avenue) to the east and the Oceanpoint Tower (170 Ocean Avenue) to the south-east. The Ranelagh Tower (3 Darling Point Road) was also considered.

Further to the east outside the immediate catchment is the Karoola Tower on Edgecliff Road. It has been considered that the height of the proposed envelope up to the same height of the Karoola tower would be in the visual catchment shadow of the Eastpoint Tower (i.e. its view is blocked by the Eastpoint Tower).

Based on the modelling by FJMT, RLA concludes that given Eastpoint reaches RL92m with a height approximately 26m higher than the existing development on the site, roughly eight storeys could be affected by view impacts above what is already caused by the existing development on the site. Additional height on the site above RL92m would cause minimal or no view impacts.

RLA has also undertaken an analysis of the effects on private domain views under three different scenarios. These replicate the options identified in **Section 4.4** of this report and include:

- The massing proposed by Council under their 'Opportunity Site' Study (Option 2);
- A 30 storey lower broader tower option (Option 3); and
- The 45 storeys proposed under this Planning Proposal (Option 4).

The likely view sharing of each option (at three different heights) on private domain views for the Eastpoint Tower (180 Ocean Avenue), Oceanpoint Tower (170 Ocean Avenue) and Ranelagh Tower (3 Darling Point Road) has been assessed by RLA considering the principles of *Tenacity*.

The preliminary view sharing analysis from Eastpoint, Ocean Point and Ranelagh Towers is provided at **Appendix A** and **Appendix H**. The assessment concludes that the level of visual impact varies from low to moderate with moderate impacts to close views. At the Planning Proposal stage, the most important factor in determining visual impact is compatibility and the proposal provides high compatibility with the urban features for all the view places assessed and is therefore on balance deemed acceptable.

8.6 Internal Residential Amenity

Preliminary testing indicates that the indicative development concept is capable of achieving the solar access ADG requirement for a minimum of 2 hours solar access on 21 June between 9am and 3pm with a large portion of apartments capable of achieving more than 2 hours of direct sunlight to living areas and private open space.

In designing the internal layouts, natural ventilation and cross ventilation have been considered in order to reduce the reliance on mechanical ventilation. The precise cross ventilation percentages will be determined at the detailed DA phase. Notwithstanding, the development is capable of including:

- A large quantity of dual aspect apartments;
- A façade design that maximises the provision of windows;
- Adequate ceiling heights; and
- Adequate apartment depths.

Detailed studies pertaining to solar access and cross ventilation will be provided at the detailed DA phase to demonstrate consistency with the Apartment Design Guide and State Environmental Planning Policy 65 (Design Quality of Residential Apartment Development). Nevertheless, an assessment of the design objectives and design criteria of the ADG has been carried out based on the indicative concept which confirms that the proposal is capable of full compliance. An ADG schedule is provided in **Appendix A**.

8.7 Traffic and Transport

PTC has undertaken a Traffic and Transport Accessibility Report (refer to **Appendix I**) to accompany the proposal and determine its potential impact on the surrounding road network in relation to parking and traffic.

8.7.1 Parking

The proposed number of car parking spaces in the concept proposal have been assessed against the relevant provisions of the Woollahra DCP. A summary of residential and non-residential parking is provided in **Table 9**, **Table 10** and **Table 11**.

Table 9 – Residential car parking requirements under the Woollahra DCP

Mix	No. of residential apartments	rate	Max permitted under the DCP (rounded up)	Proposed
Studio	21	0.5 per unit	11	184
1 bedroom	85	0.5 per unit	43	
2 bedroom	102	1 per unit	102	
3 bedroom	60	1.5 per unit	90	
Visitors	268	0.2 per unit	54	
Total			300	184

Source: PTC

Table 10 – Non-residential car parking requirements under the Woollahra DCP

Use	GFA	rate	Parking multiplier	Minimum parking requirement	Proposed
Commercial office	5414	2.5 spaces per 100 sqm GFA	0.6	82	117
Retail	7143	3.3 spaces per 100 sqm GFA	0.6	142	
Medical	3092	2.0 spaces per 100 sqm GFA	0.6	93	
Total (non-residential)				317	117

Source: PTC

Table 11 – Accessible parking requirements

Use	No. of apartments / car spaces	BCA minimum rate	Parking provision (min)	Proposed
Residential (adaptable)	27 units	1 per adaptable unit	27	24
Commercial office	117	1 per 100 car spaces	1	4
Retail		1 per 50 car spaces + 1 per additional 100 spaces	2	
Medical		1 per 50 car spaces or part thereof	1	
Total				28

Source: PTC

The residential car parking proposed is consistent with the Woollahra DCP requirements for residential car parking and accessible car parking. Non-residential car parking however is below the DCP requirements and proposes a shortfall of some 200 car spaces. This shortfall is primarily due to the existing subterranean rail tunnel which has physically limited parking capacity on the site. The nature and location of the site (being a transit orientated development) does however support a reduced non-residential car parking rate. The intent to not increase existing traffic activity associated with the exiting development on the site also supports the reduction of non-residential car parking spaces (i.e. more non-residential parking, more traffic).

Bicycle and motorcycle parking

- Under the DCP, a total of 406 bicycles spaces are required. The concept scheme provides a total of 387. Given however the detailed building configuration is subject to future detailed design and detailed development approval, the bicycle arrangements will be revised at the detailed design stage with the intention of satisfying the DCP criteria.

- The concept proposal provides for 32 motorcycle spaces (20 spaces for residential and 12 for non-residential) which is in accordance with the minimum 19 and 12 needed for residential and non-residential development respectively under the DCP.

8.8 Traffic generation

The traffic generation of the site under current conditions is extrapolated in **Table 12**.

Table 12 – Existing traffic generation

Land use	Peak period	Total peak hour trips from boom gate date	Inbound trips	Outbound trips	Existing car spaces	Trip generation rate per car space
Retail and Medical Consulting Services (Customer Car Park)	Weekday AM Peak	41	30	-	113	0.27 inbound trips/car space
			-	11		0.10 outbound trips/car space
	Weekday PM Peak	179	81	-		0.72 inbound trips/car space
			-	98		0.87 outbound trips/car space
Commercial (Tenant Car Park)	Weekday AM Peak	18	17	-	141	0.12 inbound trips/car space
			-	1		0.01 outbound trips/car space
	Weekday PM Peak	25	3	-		0.02 inbound trips/car space
			-	22		0.16 outbound trips/car space
Retail and Medical Consulting Services (Customer Car Park)	Saturday Midday Peak	232	117	-	113	1.04 inbound trips/car space
			-	115		1.02 outbound trips/car space
Commercial (Tenant Car Park)	Saturday Midday Peak	7	2	-	141	1.01 inbound trips/car space
			-	5		0.04 outbound trips/car space

Source: PTC

8.8.1 Future traffic generation

For the residential component (based on RMS rates) the traffic generation of the proposal is anticipated to be:

- 6 inbound trips and 22 outbound trips (based on 0.15 trips/car spaces) during the weekday AM peak; and
- 18 inbound trips and 4 outbound trips (based on 0.12 trips/car spaces) during the weekday PM peak.

For non-residential components, the traffic generation of the proposal is anticipated to be:

- For retail and medical / wellbeing: 44 total peak hour trips in the weekday AM peak and 186 in the weekday PM peak; and
- For retail and medical / wellbeing: 241 total peak hour trips in the Saturday Midday peak.

As detailed above, a total of 117 spaces will be allocated for non-residential use. Since the exact allocation of non-residential spaces is yet to be determined at this early stage, the rate for retail and medical use (which has a higher trip generation rate) has been used by PTC to undertake a conservative assessment

8.8.2 Net traffic generation

Based on existing and future traffic generation, the potential additional traffic which will be generated by the development (net traffic generation) can be determined. This determined by subtracting the existing traffic generation from the potential future generation (refer to **Table 13**).

Overall, the proposal will not change the overall number of trips in the morning peak hour. The overall trips for the weekday evening peak hour and Saturday peak hour are anticipated to be slightly reduced (by 16 and 3 respectively). This is equivalent to approximately 1 reduced trip every 4 minutes for weekday evening peak hour which is expected to improve the intersections performance marginally during the weekday evening peak hour.

Table 13 – Net traffic generation

Heading	Proposed trip generation	Existing trip generation	Net traffic generation
Weekday AM	72 (38 In, 34 Out)	72 (60 In, 12 Out)	0 (-22 In, +22 Out)
Weekday PM	208 (102 In, 106 Out)	224 (87 In, 137 Out)	-16 (+15 In, -31 Out)
Saturday Midday	241 (122 In, 119 Out)	244 (121 In, 123 Out)	-3 (+1 In, -4 Out)

Source: PTC

8.9 Heritage Impact

A Heritage Impact Statement has been prepared by Curio Projects (refer to **Appendix J**) to assess the heritage impacts associated with the concept proposal and redevelopment of the site in relation to the site's surrounding heritage context, in particular the surrounding heritage conservation areas. Curio make the following conclusions in relation to heritage impact and the proposal:

- The proposal will not generate any physical impact to any heritage items or fabric given the site is not listed as a heritage item and is not located on land inside a heritage conservation area;
- The proposal will not generate any heritage impact to the below and adjoining Edgecliff Railway Station which is listed under the Heritage and Conservation Register under Section 170 of the Heritage Act 1977.
- The proposal is considered to be consistent with the moderate mixed-use precinct in which it is located.
- The detailed design and articulation, as well as materiality and colour palette is commensurate with the character of surrounding heritage conservation areas and heritage items is considered to support the reduction of more distinctive visual impacts of the proposal from these sensitive areas and items.
- Materiality and planting at the streetscape level (through the proposed public domain spaces on the site) will support a positive visual impact on the precinct at the street level and align to the greenery attributed to the surrounding heritage conservation areas.
- Although the proposal would be visible from surrounding heritage items and adjacent HCAs, it would not adversely impact views and vistas to and from these items or HCA's given the key significance of these listings relate to the internal street character and street-level experience of these HCA's.
- The heritage significance and key views and vistas of Rushcutters Bay Park relate predominately to the park itself, and the connectivity of views and vistas to Sydney Harbour and surrounding inner Sydney parklands, rather than just views of surrounding development as part of the wider eastern suburb's skyline. Further, views southeast from Rushcutters Bay Park towards the development area, demonstrate that while the tower and part of the podium components of the proposal would be visible, the addition of the tower would be commensurate with the existing skyline which includes an existing residential tower and larger scale buildings.
- The existing HCAs and heritage items surrounding the site are currently affected by the current building and that the proposal provides an opportunity to have a more commensurate and improved design.
- The proposal fronting McLean Street to the south will provide a positive impact on views which are currently described by the DCP as being visually intrusive.

8.10 Rail Corridor Impact

Arup has prepared a Rail Impact Assessment Report (refer to **Appendix K**) to identify potential areas of impact of development associated with the rail corridor and provide engineering principles in relation to pedestrian flow (identified in **Section 4.6**), fire engineering and acoustics to support development within the corridor.

Arup identify the following fire engineering matters for consideration and potential mitigation measures in relation to:

- Fire in the station;
- Means of escape from the station and retail concourse areas;
- Fire in the new proposed retail concourse area or any area with an open connection to the concourse;
- Smoke hazard management between the railway station and the retail areas at the concourse areas;
- Compartmentation and fire separation between the railway station entry and retail areas; and
- Access and facilities for the fire service.

The report summaries that the overall impact of the development is an improvement to the existing rail corridor.

8.11 Wind

An Environmental Wind Assessment was undertaken by Arup (refer to **Appendix L**). It provides an experience-based wind assessment of the proposed concept envelope on pedestrian wind level conditions in and around the site. Overall, Arup considers that at the majority of locations around the site would be suitable for walking with locations on the western corners being at the upper end of the classification which can be dealt with ameliorations in the detailed design process, which is standard practice. The assessment concludes though that these wind conditions would remain suitable for the intended use of the space.

Arup also make the following recommendations to consider during the detailed design of the proposal (which is not being sought under this Planning Proposal):

- Local wind amelioration may be required for outdoor seating areas around the site, especially at the south west corner;
- A permanent or temporary screen may be recommended at the podium retail levels to dissipate winds, especially winds traveling from south to north;
- The external façade of the upper retail level should have the ability to be enclosed;
- The pool on level 14 will be subject to windy conditions and may require further enclosure;
- Higher residential balconies will be subject to windy conditions and thus for useability should have the ability to close of all faces but one to restrict air flow;
- Perimeter screening on the communal rooftop terrace should be raised to the same height as the mechanical plat to avoid flow recirculation; and
- A lift lobby is recommended on all basement levels to minimise internal flows up the lift shafts, especially for the residential car parks.

Based on the conclusions of the report, the proposal is suitably assessed at the concept Planning Proposal level and any areas of increased windiness able to be ameliorated at the detailed design stage.

8.12 Noise and Vibration

Arup has undertaken an acoustic review of the indicative scheme associated with the Planning Proposal (refer to **Appendix M**). A full Acoustic Assessment will accompany the future Development Application. It discusses from an acoustic perspective, the suitability of the uses proposed for the site given its over-station position and proximity to New South Head Road.

Arup conclude that:

- It will be feasible to comply with the relevant acoustic policies and standards to provide a suitable acoustic outcome for uses of the site; and
- Detailed acoustic and vibration studies will be required during the detailed design and approval stage, including detail and specific mitigation and management measures.

8.13 Contamination

Aurecon has undertaken a Detailed Site Investigation Assessment (refer to **Appendix N**), even though it is technically not required following recent amendments to SEPP 55. Based on the desktop information reviewed, it has been considered that the site represents a low risk in relation to contaminants of potential concern with concentrations that would pose a potential risk to human health and or the environment, or constrain the future use of the site for the intended purposes.

Specifically, the following is noted:

- The site has been subject to urban development since prior to the 1940s and has been in its current state since the 1970s.
- The site is anticipated to consist of man-made fill above residual soils and bedrock. This man-made fill from onsite filling in the 1970s from the construction of the existing site and railway corridor does mean some present contaminants of potential concern, however, as detailed above, these are not likely to pose a risk to human health.
- Any future redevelopment and excavation will be subject to soil sampling either prior to construction or as spoil is produced. This will further determine the suitability of the site for the proposed uses, inform waste classifications for disposal, and whether spoil can be re used on site or disposed off site.
- A Construction Environmental Management Plan/s (CEMP) should be prepared during any future redevelopment to minimise risks associated with runoff and dust. It should also include an Unexpected Finds Protocol for incidental potential contamination finds during earthworks and construction. The CEMP must detail the methodology to handle, manage and dispose any contamination found previously identified.

For these reasons the proposal is considered suitable from the SEPP 55 perspective.

8.14 Infrastructure Services

IGS has undertaken a desktop review of the existing utilities of the site and their capability in accommodating the proposal (refer to **Appendix O**). It also makes recommendations so as to any utility upgrades which would be required to accommodate the proposal. The following is of note from the IGS review:

- In order to accommodate the proposal, two new onsite substations will likely be required;
- Two natural gas mains are located in the vicinity of the site. These are estimated to have adequate to support the proposal (subject to assessment and approval from the gas provider Jemena);
- Multiple telecommunications conduits are located along New South Head Road and McLean Street, and these are anticipated to have the carrying capacity to support the proposal;
- No major existing water services will need to be disconnected or diverted. The existing reticulation tee of the trunk main in New South Head Road will likely need upgrading to supply the proposal; and
- An existing gravity sewer (225mm) extends from the southern boundary of the site, across McLean Street and connecting to a sewer main at New McLean Street. It is considered to have enough existing capacity to serve the proposal.

8.15 Ecologically Sustainable Development

8.15.1 Sustainability

Ecologically sustainable development requires the effective integration of economic and environmental considerations in decision-making processes. Ecologically sustainable development can be achieved through the implementation of the following principles and programs, in accordance with the EP&A Regulation. The proponent is

targeting to redevelop the site in accordance with the following sustainability commitments and targets identified in the ESD Strategy prepared by Arup (refer to **Appendix P**).

- Aspirational 5 Star NABERS energy rating for commercial office space;
- 40% reduction in water use and 25% reduction in energy use as per BASIX; and
- Compliance with Section J of the BCA for the retail component.

These commitments will be achieved across the delivery of the development. These comprise initiatives to address the management and maintenance of the building, the selection of construction materials, demand for resources such as water and power, the use of sustainable modes of transport, impacts to the local ecosystem, emissions, and general community wellbeing. It demonstrates that there are opportunities to implement best-practice sustainable building principles and improve the environmental performance of the development.

8.15.2 Precautionary Principle

The precautionary principle is utilised when uncertainty exists about potential environmental impacts. It provides that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. The precautionary principle requires careful evaluation of potential environmental impacts in order to avoid, wherever practicable, serious or irreversible damage to the environment.

This Planning Proposal has not identified any direct serious threat of irreversible damage to the environment and therefore the precautionary principle is not required to be applied in this instance.

8.15.3 Intergenerational Equity

Inter-generational equity is concerned with ensuring that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations. The proposal has been designed to benefit both the existing and future generations through:

- encouraging sustainable transport options as a Transit Orientated Development;
- reduces carbon emissions and the demand on resources;
- reduces waste that goes to landfill via the choice of materials and a centralised waste strategy;
- monitoring and tuning the performance and operation of the building across the range of land uses.
- Social benefits of the proposal – ageing in place, medical and wellness, homes to families and singles.

The proposal has integrated both short and long-term social, financial and environmental considerations so that any foreseeable impacts are not left to be addressed by future generations. Issues with potential long term implications such as waste disposal would be avoided and/or minimised through construction planning and the application of safeguards and management measures.

8.15.4 Conservation of biological diversity and ecological integrity

This principal upholds that the conservation of biological diversity and ecological integrity should be a fundamental consideration in development. The proposal would have no significant impact on biological diversity and ecological integrity.

8.15.5 Improved valuation, pricing and incentive mechanisms

The principles of improved valuation and pricing of environmental resources requires consideration of all resources which may be affected by a proposal, including air, water, land and living things. The cost of infrastructure, biodiversity offsets, design measures, and other sustainability initiatives for the renewal of Edgecliff Centre have been incorporated into the cost of development and will be delivered in the most cost-effective way via a life cycle cost approach that provides best return on investment. Mitigation measures for avoiding, reusing, recycling and managing waste during construction and operation would also be implemented to ensure resources are used responsibly in the first instance.

8.16 Geotechnical and Structure

A Geotechnical and Structural Engineering Statement has been prepared by Aurecon (refer to **Appendix Q**). The assessment identifies geotechnical constraints which may impact the proposed redevelopment of the site. The impact on and from the future redevelopment on the site on the existing rail infrastructure has also been considered.

Overall, Aurecon conclude that based on the expected geotechnical conditions of the site, the proposal can be feasibly designed and constructed on the site to ensure no adverse impact to the below rail corridor. This is based on conformance with the recommended design measures and mitigation measures identified by Aurecon.

8.17 Airspace Operation

A Preliminary Aeronautical Assessment has been undertaken by Strategic Airspace (refer to **Appendix S**) to assess the aviation-related airspace height impacts of the proposal. The assessment concludes:

- The height of the proposal would infringe the Obstacle Limitation Surface (**OLS**) on the site by 39m which would trigger the need for height approval under the Airports (Protection of Airspace) Regulations (**APAR**). The proposed height is approvable under the APAR but may be subject to conditions.
- The height of the proposal would be well below the PANS-OPS and the Radar Terrain Clearance Chart and is therefore considered approvable.
- There would be ample room for cranes to operate at a maximum height that would not exceed the height constraint of the limiting surface. Thus, implications associated with cranes would not affect the assessment of the height application.
- Considering the above, Strategic Airspace see no technical impediment to approval of the proposed works under the APAR.

8.18 Economic Impacts

An Economic Impact Assessment has been prepared by Hill PDA (refer to **Appendix R**) and a Social and Economic Benefits Statement has been prepared by Ethos Urban (refer to **Appendix W**). The Planning Proposal will have the following economic benefits:

- The proposed scheme will have a construction cost of circa \$346 million, with total economic activity associated with construction estimated at 1 billion. This includes:
 - \$443 million of economic activity in production induced multiplier effects;
 - \$313 million in consumption induced effects;
 - 863 jobs directly in construction; and
 - An additional 2,604 jobs through production induced and consumption induced multiplier impacts.
- The proposed scheme when or close to full occupation will generate an estimated 692 jobs. This is a net increase of 225 over the current operation. This will include:
 - 197 full and part time retail jobs;
 - 390 predominantly full-time jobs associated with the office floor space; and
 - 85 predominantly full-time jobs associated with the medical/well-being uses.
- The site once developed will contribute \$66 million to regional domestic product. This is an \$19 million net increase from current operation.
- The net increase in retail expenditure to the Edgecliff area from the additional residents and employees is estimated to be equivalent to approximately \$5 million per year.
- There is growing retail demand in Edgecliff. This is largely from the primary trade area (i.e. local residents within 500m of the site), adjoining residents from Darling Point (where there is no shopping centre), the 3,000 workers in Edgecliff, and the 3,500 daily train commuters. From these sources of demand, total retail sales could reach 110 million by 2026 which would translate to a need for 14,400 sqm of additional retail space, of which 4,700 sqm would be for supermarkets.

8.19 Social Impacts

A Social Impact Assessment has been prepared by Cred Consulting (refer to **Appendix X**) and a Social and Economic Benefits Statement has been prepared by Ethos Urban (refer to **Appendix W**). The Planning Proposal will have the following social benefits:

- The proposed upgrades to public open space include publicly accessible open green space adjacent to the bus interchange, enhances inter-modal connectivity, improved and highly legible entries and community spaces.
- There are also several unquantified social benefits associated with the proposal, including:
 - The creation of new and modernised employment space closer to and more accessible to home;
 - The replacement of an existing centre and commercial development and the creation of a transit orientated development with high-density employment and residential at a major transport node, thereby supporting urban consolidation, active transport use, improved accessibility to transport and reduced car dependency; and
 - Greater activation of the Edgecliff town centre and an improved identity to the town centre.
- Creating housing diversity and supply for an area that has limited housing diversity and new stock opportunity. The diversity of housing will support older people to age in place in the Eastern Suburbs, and adaptable housing options for people with disability.
- Provision of additional housing supply to cater to smaller household sizes including working aged population, singles, young families and downsizers.
- Integrated medical offering for a local downsizing senior population and in an accessible location for other uses of medical facilities in the LGA.
- Improved visual amenity for Edgecliff through the renewal of an outdated and dysfunctional centre and transport interchange. This provides an opportunity for an increased sense of community identity for the centre of Edgecliff.
- Easily accessible public open space with publicly accessible vistas which might not be otherwise available in the LGA due to terrain and position of the site on the ridgeline.

9.0 Public Benefit

As evidenced in the preceding sections of this report, the proposal contains a number of opportunities for significant public benefits. These benefits are not limited to the redevelopment site itself but will extend to the broader Edgecliff town centre and beyond.

Each listed benefit is highly desirable and is facilitated through the redevelopment of the site in the form proposed. Whilst the proposed redevelopment is proposed on the site, the benefits of the proposal will extend beyond the site's boundaries, importantly contributing to the reinvigoration of the existing bus interchange and railway station, and contributing overall to the reinvigoration of the Edgecliff town centre.

When the public benefits of this proposal are viewed comparatively to the private benefits which will be gained from the redevelopment, it is evident that the proposal effectively balances public and private benefits. This is evidenced in a number of ways through particular elements of the proposal, such as:

- A new address and upgraded entry significantly enhancing the legibility and identification of both the Edgecliff Railway Station and bus interchange along New South Head Road.
- A new internal circulation and intermodal connection to provide direct, convenient, legible and easily accessible pedestrian links through the site and local street network to the railway station and adjoining bus interchange.
- Creation of place through new public spaces and landscaping to establish a more attractive destination. This includes:
 - Attractive fine-grain retail laneway fronting New South Head Road;

- A new ground floor civic plaza and shared public square with further fine-grain retail and place-making opportunities; and
- New public forum integrating the site to the adjoining bus interchange with new public open space, easy access to retail and, medical and well-being uses is also provided.
- Inclusion of a new through site link to enhance pedestrian permeability to accommodate a connection between residents to the north and Trumper Park.
- Revitalisation of the current bus interchange with the inclusion of a publicly accessible open green space with wide spanning vistas. The space can act as a multi-functional space for leisure, active-uses and gathering it will be designed for all users including children and the elderly to ensure universal accessibility. This element of the proposal offers a unique opportunity to provide a meaningful and highly accessible open green space within a constrained urban setting utilising the public nature of the bus terminal to create a user friendly extension of the existing public domain for the whole community.
- The co-location of residential uses with retail, medical/well-being and commercial uses will support transit-orientated development and contribute to the creation of a walkable centre that provides homes in proximity to employment and medical uses for ageing in place.
- Leverage and utilise existing government infrastructure. The proposal will:
 - Deliver a transit-orientated development with direct vertical connection to Edgecliff Station located on the Eastern Suburbs line, which is one of the highest patronage railway lines in NSW;
 - Bring to life a fundamental planning principle which sees a density and employment increase over an existing station that is roughly a five minute train journey from Central Sydney and Martin Place; and
 - Integrate with a significant bus interchange serving the Eastern Suburbs and maximise the use of a highly underutilised and outdated transport interchange. The revitalisation of the interchange as part of the renewal of Edgecliff Centre will support and encourage greater patronage of public transport.
- Support dwelling supply on a strategically positioned site that will enable housing targets to be achieved while protecting the character of existing residential areas from drastic change. The dwelling supply will also increase the diversity and availability of housing to meet particular demand among higher than average local population of older people.
- Facilitate a mix of uses, including health/medical and wellbeing uses that will increase the provision of much needed services necessary to support the growing and changing demographic of the population and support ageing in place.
- Provide the opportunity to improve safe pedestrian crossing across New South Head Road (particularly for students to and from Ascham School).
- Provide the opportunity to improve pedestrian experience and safety between this strategic site and key public spaces at Trumper Oval and Rushcutters Bay.

9.1 State and Local Contributions

It is important to note that there is no formal requirement for the proposal to contribute to State and Regional infrastructure and the Edgecliff Centre is not covered by any of the State government nominated State Infrastructure Levies (SICs). Nonetheless, from the outset of the project, Longhurst set out to reimagine the Edgecliff Centre and how it could contribute to the Edgecliff Station and Interchange and the Edgecliff town centre more broadly. The proposal therefore incorporates a substantive amount of works contributing to State and Regional infrastructure and the proponent is in on-going discussions with Transport for NSW and Sydney Trains on the detailed design and format of the public benefit offer for these works. These discussions are on-going, and it is anticipated that a condition of the LEP Gateway Determination will be that the proponent formalises a Planning Agreement or other arrangement with Transport for NSW with respect to the State and Regional benefits, being the transport interchange works.

Significantly, the proposed contributions towards State and regional infrastructure, in the form of the proposed interchange works to be agreed with Transport for NSW and Sydney Trains, would greatly enhance the legibility and identification of both the Edgecliff Railway Station and bus interchange along New South Head Road. These contributions would constitute critical enabling infrastructure that will become a catalyst for further development and

the provision of additional local public benefits by other developers in the form of the implementation of contributions plans or other planning agreements.

With respect to local contributions, Section 7.11 or Section 7.12 contributions will be applicable to the development. It is noted that a number of the works proposed address the types of community needs identified in the relevant contribution plans. For example, recreation, parking, civic improvements, infrastructure renewal, open space and community facilities are contemplated as works to be contributed to under the Woollahra contribution plans. The public benefits associated with the Planning Proposal will substantially outweigh the current cost of development contributions levied under Section 7.11 and/or Section 7.12. It is prudent to note that there is no statutory requirement to deliver the capital works associated with this Planning Proposal and whilst it is acknowledged that there is a nexus for a proportion of these works to facilitate the renewal of the site, we emphasise that the majority of the works will provide a greater public benefit that will extend beyond the site and service the broader community. Based on the public benefits of the proposal outlined in this section, and the delivery of those contributions to the Edgecliff town centre, Longhurst wishes to open dialogue with Council's Capital Works Team regarding a Works in Kind Agreement (WIK) or possible planning agreement for the delivery of the public benefits associated with the proposal.

It is noted that the DPIE has recently released the Draft Secretary's Practice Note on Planning Agreements and an accompanying Ministerial Direction on Planning Agreements dated April 2020. The draft practice note explicitly states that value capture should not be used in planning agreements in connection with planning decisions. This practice note provides clear and consistent direction to Relevant Planning Authorities (RPAs) for Planning Proposals.

Notwithstanding this, the combination of State, Regional and local benefits provided by the proposal delivers and demonstrates substantial public benefits, not just for the site itself but for the broader Edgecliff Town Centre and Woollahra LGA, as described in further detail below.

9.2 Entrance and Public Square

The intent of the proposal is evidenced through the treatment of the ground plane and podium. There is significantly improved activation along New South Head Road (**Figure 38**) and New McLean Street. The proposal adopts the strategy of blending the internal and external spaces of the ground floor to create a seamless open-plan plaza lined with fine-grain retail which is intended to create a village style atmosphere. The plaza extends outwards onto New South Head Road, creating a very clear address for the Edgecliff Railway Station from the public domain. Like previously mentioned, this will provide an improved pedestrian experience allowing for a more permeable ground plane and podium to enhance the experience for the community.





Figure 38 – Indicative site entry and frontage

Source: FJMT

9.3 Creation of New High Quality Interchange

The proposal creates a significant improvement to the existing connectivity and interface issues currently facing the site. The proposal supports new direct vertical connections to the railway station below and the bus interchange above. A new central atrium (**Figure 39**) will support direct elevator access to the bus interchange and publicly accessible open space, supporting more direct and permeable access from the street and improved universal access for users of the station of all capabilities.

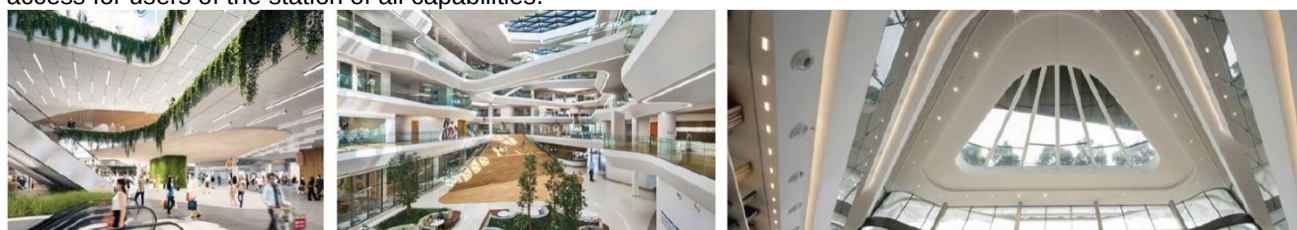


Figure 39 – Indicative atrium and vertical access facilitated

Source: FJMT

9.4 Transit Orientated Development

Transit Orientated Development (TOD) seeks to maximise the amount of residential, business and leisure space within the proximity of public transport. It enables the creation of compact, walkable, pedestrian-oriented, mixed-use communities centred around high quality train systems, which in turn reduces car dependency and improved sustainability outcomes. The proposal is a prime example of a TOD and will collocate homes, jobs and services with existing infrastructure to revitalise the centre, reduce car dependency in the LGA and increase the efficiencies and sustainability associated with travelling to work and home, and accessing goods and services.

9.5 Upgrades and revitalisation of existing transport infrastructure

A key driver and outcome for the renewal of the Edgecliff Centre is the much-needed regeneration of the Edgecliff Transport Interchange. Currently, both the railway station and bus interchange suffers from poor accessibility, activation and amenity within an aged and landlocked interchange. The catalyst to facilitate the revitalisation of the existing key interchange for the Eastern Suburbs is the renewal and redevelopment of the Edgecliff Centre.

Further, the site is located adjacent to the transit interchange and sits above the train platform. The interchange is the only interchange in the LGA and operates as a key transport hub. As part of the proposal the development will seek upgrades to provide better intermodal connections, improve the station legibility and wayfinding to create better commuter amenity and experience for all users.

9.6 Publicly Accessible Open Green Space

The proposal offers a unique opportunity to provide publicly accessible open green space within the development in a constrained urban area. Adjoining the existing Edgecliff Bus Interchange, the proposal will create an extension of the existing public domain, transforming it into a multi-functional public realm destination.

The proposed open space will facilitate key connections from the bus terminal to the train concourse and contribute to the Woollahra open space network by providing a key community benefit of new open public green space. The park will significantly improve the interface for users of the bus terminal and seek to provide further connectivity synergies with the transport uses on the site, providing a green break out space and opportunity for leisure (as opposed to simply commuting), which is a desired goal of improving transport infrastructure.

An amphitheatre-like experience has been designed to provide ample opportunity to gather and congregate within the space and includes features such as naturally rolling hills, trees and planting, gardens, hard and soft landscaping, bicycle parking, open spaces for seating, leisure and retreat and varying place making initiatives. Further opportunities to activate spaces with active uses such as place spaces or public art can be refined with key stakeholders during the proposed stakeholder engagement prior to detailed design of the Development Application.



Figure 40 – Sky plaza and publicly accessible open space (indicative)

Source: FJMT

9.7 Land Uses – Medical and Community Facilities

The land uses proposed are in the public's interest. In particular:

- In 2019, Woollahra had more people with an average age over 60 than the rest of Sydney (23.8% compared to 19.0%). There is also an anticipated increase in older people to 2036 (22% increase in those aged 65 – 84 and 68% increase in those aged 85+). The medical and wellbeing uses proposed will support the ageing population, improve access to medical services and help ageing in place.
- The population of Woollahra and broader Sydney continues to grow. Sydney is forecast to grow by another 1.7 million people by 2036 and 3.2 million more people by 2056. Woollahra is expected to increase from 58,964 in 2019 to 59,850 in 2036. By 2056, population will increase by 38% (according to Council's Draft Integrated Transport Strategy). The residential land use proposed will support housing demand in the LGA, improve housing choice and diversity, whilst placing density in appropriate locations to assist in protecting the existing character of low density residential areas in the LGA.
- Further, given that half the residents of Woollahra currently travel into the City of Sydney LGA for work, new homes directly above both the Edgecliff Railway Station, and employment uses in the podium, will support the Greater Sydney Commissions '30-minute' city concept and bring jobs and homes closer together.
- Woollahra Council currently forecast a decline (3%) in their working age population (those aged 20 – 64 years). The retention and expansion of commercial floor space (including retail) in the proposal will help draw a working

age population back to the LGA. It will also support job growth in the LGA and increase job opportunities for residents which will reduce the need to travel for work outside the LGA.

9.8 Ageing in Place

The proposal will support ageing in place, which is commonly understood as the ability to continue living in one's home and/or community comfortably and independently even as one ages. Ageing in institutionalised facilities in comparison, can be more costly and it may reduce seniors' independence and autonomy, whilst ageing in the family home is often not fit for purpose or size. An ageing in place approach collocates accessible housing in close proximity to everyday goods and services, medical services and transport.

Whilst the area surrounding the site has many existing apartments, these are predominantly art deco style apartments with poor accessibility which in many cases do not include lift access. Therefore, older members of the LGA have limited options to transition into more appropriate low-maintenance housing which has the required accessibility and active connections to every day need services such as retail, medical, transport and professional services.

A redevelopment at the Edgecliff Centre will improve the local and medical/wellbeing services available to the community (especially the ageing), and upgrades to the public transport interchange will improve the accessibility for the wider community to these facilities. New housing will also increase the housing options available to the community including young home buyers and families looking for highly accessible living options.

9.9 Traffic and Parking

The fundamental planning and design of the proposal has been established with the aim of creating a neutral traffic impact compared to current conditions. The proposal will have no net increase in traffic movements when compared to current traffic conditions arising from the site.

This has been achieved through a reduction in commercial car spaces, the redistribution of the current non-residential spaces, and the addition of limited residential apartments car spaces. The proposed parking provision satisfies the requirements of the planning controls and the demand for parking (based on data collected from the existing building), while providing a cap on the traffic activity which affects the local road network. This approach is consistent with the design principles of a TOD which puts public transport at the forefront with a reduced focus on car parking and car dependency.

The design of the proposal has sought to improve the existing traffic conditions through the creation of a single entry/exit along the southern boundary of the site. This will see the removal of the existing driveway which sits in close proximity to the New South Head Road intersection and which currently requires vehicles to slow to manoeuvre into the carpark.

9.10 Sustainability

Through design innovation, the site presents an opportunity for a redevelopment which can demonstrate a high achievement of sustainable development. The energy commitments (including NABERS Energy rating of 5 stars, and a 4 Star NABERS Water rating) have the potential to be a benchmark and example for sustainable development in the Eastern District.

9.11 Post Covid 19 Recovery

The renewal of the site will contribute to an expeditious economic recovery status post COVID-19. The existing centre is outdated and is nearing the end of its optimal life (which is evident by higher than average vacancies). The site provides a large, consolidated area for renewal and is strategically positioned above an existing rail corridor and adjacent to a bus interchange. The renewal of the site will stimulate the economy by providing investment in the pipeline of construction jobs and ongoing employment opportunities.

The renewal of Edgecliff Centre as a Transit Orientated Development is a once in a generation opportunity to underpin Edgecliff as the gateway to the Eastern Suburbs and to create a landmark place. Edgecliff currently lacks a town centre identity due to the limitations and age of the current built form. The renewal of Edgecliff Centre offers

a unique opportunity for Edgecliff to be a revitalised town centre in a post COVID-19 world where activation and vitality will be imperative to society's recovery.

10.0 Part 4 – Mapping

The proposed mapping amendments to the Woollahra LEP will comprise of the following:

- Amendments to the Height of Buildings Map; and
- Amendments to the Floor Space Ratio Map.

Proposed extracts of the map amendments are proposed at **Appendix G**.

11.0 Part 5 – Community Consultation

Community consultation will be conducted in accordance with Section 3.34 and Schedule 1 of EP&A Act and A *Guide to Preparing Planning Proposals*. Generally speaking, the Gateway determination will require consultation to occur with the community. Feedback collected during that consultation period will be addressed at this time.

Notwithstanding the above, Longhurst intend to commence a proactive and early consultation program with the community to help inform design concepts. However, the preparation of this Planning Proposal has coincided with the peak of the COVID-19 pandemic and the NSW Government's formal social distancing requirements that have precluded meaningful face-to-face community engagement.

In light of the significant barrier for community engagement during the COVID19 pandemic, A Community Sentiment Summary Report prepared by Ethos Urban has specifically identified key themes, aspirations or issues already prevalent in the local community relating to similar developments and issues specifically documented as part of Council's previous consultation activities. These themes or issues have been noted and assessed against the concept scheme for the Edgecliff Centre as part of this Planning Proposal (refer to **Appendix V**).

The documents and developments reviewed included.

- Woollahra Local Strategic Planning Statement 2020. The LSPS was subject to community consultation during early 2019 to inform its vision and a detailed consultation report was prepared on the feedback received, and how this feedback informed the LSPS.
- Woollahra Community Strategic Plan – Woollahra 2030. Community engagement was undertaken in the preparation of this Plan during 2017 which was integrated into the themes and goals.
- Eastern City District Plan. During the preparation of the report, the Greater Sydney Commission undertook extensive community engagement that was drafted into a Submissions and Engagement Report.
- Future Transport Strategy 2056. This Strategy included extensive consultation with various stakeholders through a co-design process and response to submissions. Feedback from across metropolitan Sydney was consolidated and refined into the plans for the Strategy.
- Redevelopment of White City. White City is located west of Edgecliff Centre and interfaces with neighbouring communities. The project has undergone several stages of planning applications in recent years and has attracted a high level of community and political interest.
- 136 New South Head Road, Edgecliff. While the proposed development at 136 New South Head Road is smaller in scope and scale to the Edgecliff Centre, it is located directly opposite the site. No formal community consultation report was prepared as part of its Development Application; however, media reporting has identified some concerns raised by immediate neighbours.

While providing an overview of the relevant consultation undertaken by third parties with communities close to the Edgecliff Centre, the Report notes the outcomes Longhurst Group have carefully considered and reviewed in the absence of an opportunity to undertake face-to-face consultation due to COVID19 directives from State and Federal Government.

A clear alignment between consultation outcomes and strategic merit of this project has been demonstrated by addressing existing community sentiment from strategic planning documents and similar scale developments.

Design considerations have been guided by community feedback raised in the LSPS, particularly in ensuring that the new development will meet the daily needs of the local ageing population while significantly contributing to the local economy in a uniquely suitable location. The proposal displays strong capacity to address many of the concerns raised in the LSPS while offering the desired amenities and features to improve Edgecliff as a Strategic Centre, including:

- Provision of increased residential capacity and diversity at an appropriate location;
- Creating quality public space and landscaping;
- Making best use of existing transport infrastructure and improving connectivity.

A formal community consultation program will commence at a later stage of the planning process, expected to occur after a Gateway Determination and aligned to the formal public exhibition period of the Planning Proposal. Longhurst has a firm commitment to proactive engagement with the local community, Council and other key stakeholders throughout the life of this project.

Woollahra Council's Community Engagement Policy 2019 and relevant NSW Government standards of engaging with communities on State Significant projects have been thoroughly reviewed and will be used to guide a community engagement program that will inform clearly, connect with communities and offer genuine opportunities to input into the decision making process. This consultation program will therefore:

- Ensure that stakeholders and the community have access to clear and factual information about the Project;
- Allow documentable input from stakeholders and the community during the preparation of the Project;
- Clearly communicate the Project's potential benefits, opportunities and constraints to stakeholders and the community;
- Build a constructive dialogue with stakeholders and the community; and
- Reinforce and support Longhurst Group's values and commitment to community values.

12.0 Part 6 – Indicative Project Timeline

Below is an indicative timeline for the planning proposal.

Milestone	Timeline
Submission of Planning Proposal	October 2020
Reporting of planning proposal to Council for endorsement	December 2020 / January 2021
Referral to Minister for Gateway Determination	December 2020 / January 2021
Date of Gateway determination	April 2021
Commencement and completion of public exhibition	May 2021
Government agency consultation (pre/post-exhibition as required by Gateway determination)	June 2021
Timeframe for consideration of submissions	June-September 2021
Reporting of exhibition back to Council for endorsement	October 2021
Finalisation and forwarding of the LEP	November 2021
Anticipated gazettal	December 2021

13.0 Conclusion

This Planning Proposal to amend the Woollahra Local Environmental Plan 2014 (**Woollahra LEP**) has been prepared by Ethos Urban and a broader consultant team, on behalf of Longhurst Group and relates to land at 203-233 New South Head, Edgecliff. This Planning Proposal seeks to amend the Woollahra LEP to increase the applicable maximum building height and floor space ratio development standards for the site. The amendments will facilitate the site's future redevelopment for a new mixed use precinct, that will transform and renew the current Edgecliff Centre as a place and focal point for Edgecliff.

This Planning Proposal seeks Council's support for a site-specific amendment to the LEP for the following:

- Increase the maximum permissible building height from 6 and 26 metres to RL 195 in support of an appropriate urban built form that results in acceptable environmental impacts to surrounding properties and public open space; fosters the principles of transit oriented development; is consistent with local and State strategic planning policies, and delivers significant economic and social benefits to the locality; and
- Increase the maximum permissible floor space ratio (**FSR**) from 2.5:1 to 9:1 to meet employment and housing targets and the anticipated demand for jobs growth. Of the 9:1 FSR proposed, a total of 3:1 will be restricted to non-residential, employment generating floor space.

This Planning Proposal is justified for the following reasons:

- The proposal is consistent with the objects of the Environmental Planning and Assessment Act 1979, in that it promotes the orderly and economic use and development of land;
- The proposal is by and large consistent with the strategic planning framework for the site;
- The development concept is fully aligned with transit oriented development in that the planning proposal will facilitate the:
 - Rejuvenation of Edgecliff creating a vibrant mixed use town centre as the gateway to the Eastern City District;
 - Provision for retail and commercial floor space to accommodate a variety of uses including specialty retail and community space, leisure, and medical/well-being facilities, creating additional employment opportunities to meet the job target for the Eastern City District;
 - Provision of key transport infrastructure to improve the inter-modal transport connectivity between Edgecliff Station and bus terminal, as well as interchange legibility and customer journey experience;
 - Activating the area after hours with mixed use development; and
 - Provision of diverse housing choice within immediately adjacent to the Edgecliff Railway Station and in close proximity to the largest employment area being the Sydney CBD.
- The proposal is consistent with the applicable SEPPs and Ministerial Directions;
- The proposal generates no additional traffic generation compared to current conditions and encourages the use of public transport.
- The proposal will deliver significant economic benefits to the locality and broader region, including:
 - Creation of 2,600 jobs across the broader supply chain;
 - An industry value-added of \$66m to regional domestic product which is significant compared to the existing which is a net increase of \$19 million from the existing building stock/current operation; and
 - It will contribute to meeting the demand for retail floorspace without compromising to the viability of surrounding centres.
- The proposal will deliver a range of social benefits, including
 - The proposed upgrades to public open spaces. This includes the bus interchange public green space, revised entries, and community spaces;
 - A number of new retail services that will contribute to activation;

- Upgrades to the existing Edgecliff Station entry and intermodal connections to the adjoining bus interchange to improve the overall use experience of these public transport assets; and
- A new pedestrianised public domain that will improve the vitality of the area.

The proposed amended planning controls will allow the site to reach its strategic potential and provide an appropriate mix of uses for an effective transit oriented development and contribution to the Edgecliff town centre. The site benefits from immediate and direct connectivity to Edgecliff Railway Station and bus interchange which offers significant uplift in transport capacity in the local area.

To this end, the Planning Proposal and indicative development concept for the site fosters the principles of transit-orientated development, which a complete rethink of how developments are arranged and function, offering significant benefits and opportunities for Woollahra LGA and Edgecliff Centre.

Accordingly, considering the proposal and the overall strategic nature of the site and justification provided in addressing planning issues, the Planning Proposal is considered to have sufficient Strategic Merit. This Planning Proposal also demonstrates that the density proposed can be appropriately accommodated on the site while also minimising environmental impacts and not compromising the amenity of surrounding residential receivers, heritage and valued public spaces. This supports the site-specific merit of the Planning Proposal.

For these reasons, we have no hesitation in recommending this Planning Proposal for Gateway Determination.