

Appendix B

Questions to consider when demonstrating merit

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 and actions highlighted within the strategic planning framework. This includes the *Woollahra Local Strategic Planning Statement 2020 (Woollahra LSPS)* which was endorsed by the Greater Sydney Commission (**GSC**) in March 2020.

The Woollahra 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.
- Areas worthy of further detailed strategic planning.

The Woollahra 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, Planning Priority 1, Action 6 of the Woollahra LSPS notes 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 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'.

This Planning Proposal seeks to expand commercial (including retail) and health related uses. It 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 GSC's vision for a 30-minute City. The Planning 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 Woollahra LSPS that the Planning Reviews for Edgecliff and Double Bay will seek opportunities to increase housing and employment in these key 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 Woollahra LSPS planning priorities is included at **Question 4** below.

In addition, the Planning Proposal will also give effect to planning principles and has sought to incorporate key elements within the *Draft Edgecliff Commercial Centre Strategy (Draft ECC Strategy)* which has not been endorsed at the time of writing. The Draft ECC Strategy sets a new vision for the Edgecliff commercial centre and makes recommendations on (amongst other things) built form outcomes, maximum building heights and community infrastructure.

For the site, the Draft ECC Strategy set:

- A proposed building height of 86m across two residential towers between 14 and 26 storeys.
- A proposed floor space ratio of 7.5:1 (circa 44,003 sqm of GFA) (which assumed amalgamation with part of the Council Owned Road Reserve fronting New McLean Road).
- A central public plaza, ground floor retail and a part four and part 5 storey commercial podium.

The Proponent, in collaboration with Council, has considered the Draft ECC Strategy and have worked to ensure these are responded to (and refined) as part of the Planning Proposal. The way in which the Planning Proposal

has evolved from the Draft ECC Strategy and aligns with or enhances the principles and key elements is explained **Section 9.2** of the Planning Proposal Report.

Notably, the Planning Proposal has more appropriately considered the site-specific constraints and opportunities to enhance amenity (when compared to the massing described in the Draft ECC Strategy). It also provides the opportunity to create a visually striking focal point at the gateway to the Eastern Suburbs. This is consistent with the following point identified in the Draft ECC Strategy:

"The distribution of the maximum HOB generally follows the natural topography. The highest HOB is concentrated around the ridgeline to emphasise the sloping topography (around the train station) and steps down with the natural landform. This allows reasonable amenity and views to be maintained across the ECC."

From a strategic planning perspective, the following points are also noted:

- Under the strategic planning framework, Edgecliff is identified as a Local Centre, which simply reflects the designation given the centre in the District Plan. Whilst this type of centre plays an important role in providing access to goods and services close to where people live, Edgecliff has a unique point of difference in that it shares many of the key attributes of other, larger Strategic Centres. Some of these key attributes include enhanced mass transit and public transport accessibility, high levels of district and regional connectivity, and access to a more diverse range of jobs, services, and amenity given its proximity to the Sydney CBD.
- As a result of the above, there is a significant amount of latent capacity in infrastructure capacity and high-level liveability criteria that are met in Edgecliff. Through an analysis of centre attributes across Sydney it is apparent that a centre's position on the hierarchy (i.e., whether it is designated as a Local or Strategic Centre) does not directly assess or mandate its suitability for building heights or density.
- 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 Planning Proposal will release pressure from these smaller villages to accommodate additional density and utilise existing and suitable land for higher order development.
- Following from this, 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 (and have the chance of generational contribution to housing supply) 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 this traditional centres hierarchy and is identified as a Local Centre. It is, however, 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 *Eastern City District Plan* notes that centres with a supermarket (Edgecliff contains two) qualify as larger local centres. Therefore, support for an elevated role is reinforced by the Woollahra LSPS which designates the centre as a 'key local centre'.
- A detailed assessment of the site against the centres hierarchy within the Greater Sydney Region Plan is provided in **Section 8.3** of the Planning Proposal Report.

Q2. Is the Planning Proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

The amendments proposed to the WLEP 2014 are considered the best way of achieving the intended outcomes established under **Section 5.1**. The following options have been assessed, which is additional to the built form analysis undertaken in **Section 6.0**.

These options included:

- Option 1 – Do nothing.
- Option 2 – Redevelop the site under the current controls of the WLEP 2014.

- Option 3 – Prepare and submit a Development Application (**DA**) and request to vary a development standard pursuant to clause 4.6 of the WLEP 2014 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/adoption of the Draft ECC Strategy.
- 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 'do nothing' option forgoes a unique opportunity to deliver significant enhancements to the existing site and public domain improvements for the locality. The opportunity to facilitate a place-based planning approach to the site to accommodate additional employment generating uses, medical and community 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 and reducing the pressure for 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.
- Introduction of a public open green space.
- Expansion of medical facilities and updated relevant retail (including supermarket) uses to support the local community.
- Diversification of more productive commercial floor space to meet the current and future needs of the community.
- Dedication of land to contribute towards a multi-purpose community facility.

Option 2 – Redevelopment under Current WLEP 2014 Controls

A redevelopment scenario under the current controls would not support the intended outcomes of this Planning Proposal and would provide a suboptimal urban design outcome and suboptimal transit-oriented development outcome.

Specifically, a complying LEP envelope (shown at **Figure 1**) 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 1 Building Envelope under the Current LEP Controls

Source: FJC

Option 3 – 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 WLEP 2014.

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, which would be a large Clause 4.6 variation and well beyond the realms of comfort for most Council's to accept and assess.

Option 4 – Finalisation of Draft ECC Strategy

Strategic planning for the Edgecliff Centre has been in motion by Council for over a decade (which has included a Commercial Centre Study in 2015 and an Opportunities Sites Study in 2010).

The Draft ECC Strategy was publicly exhibited on 31 May 2021 – 30 September 2021. At the time of preparing this Planning Proposal, the Draft ECC Strategy has still not been finalised and there is no specific gazettal date associated with the Strategy to allow the Applicant to plan for the future of the Centre. Once finalised, any planning changes arising from the recommendations of the Strategy, still require a Planning Proposal to be implemented in any event.

Conversely, the Applicant, over the last four years, have developed a specific and carefully considered urban design response to the site and have revised this approach based on feedback from the Panel. 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 Ethos Urban with guidance from a multifaceted consultant team including FJC Studio, 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 LSPS.

A number of existing leases on the site expired in 2022, and further leases will expire prior to the commencement of any development at the site. Any ongoing leases have clauses built into the contracts to ensure that tenants are aware of the proposed redevelopment works and can make arrangements in line with this. The Applicant needs to progress the planning of the site to allow the timely consideration of the next evolution of its life and to contribute housing to support Sydney's housing supply crisis. This requires the lodgement of a Planning Proposal in a timely manner, in advance of the likely time long tail of the Draft ECC Strategy and its effects within the WLEP 2014, which at time of writing has no certain timeframe for adoption. This Planning Proposal is ready for lodgement and will contribute to vitality of the centre in a post COVID world and in response to the current housing crisis.

This Planning Proposal does not preclude Council's consideration of the overall town centre within future LEP amendments and as outlined in **Section 8.3** of the Planning Proposal Report, is consistent with the spirit and main objectives of the Draft ECC Strategy, albeit in a different built form. When compared to the Draft ECC Strategy, the proposal will provide a better outcome through greater consideration of site constraints and amenity requirements.

Option 5 – This Planning Proposal

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, being brought forward in a timely manner to allow the Applicant planning certainty on a site where there is 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 LEP framework. The overall benefits and merits of the Planning Proposal are detailed in these sections and in the Site-Specific Merit sections of the main planning report (**Section 9.0**).

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 (GSRP)* and the *Eastern City District Plan (District Plan)*.

Greater Sydney Region Plan – A Metropolis of Three Cities

The GSRP 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. 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.

The Planning Proposal is consistent with the following directions under the Plan, which govern growth and development in Sydney (refer to **Table 1**).

Table 1 Consistency with GSRP directions

Direction	Objective	Consistency of the Planning Proposal
A city supported by infrastructure	Objective 4: Infrastructure use is optimised.	This Planning Proposal seeks to respond to and better utilise the proximity to existing public transport links and bring additional housing, jobs and services directly adjacent to an existing transport hub.
A city for the people	Objective 6: Services and infrastructure meet communities' changing needs.	This Planning Proposal will support the provision of a variety of services and medical facilities directly adjacent to 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) as well as an affordable housing contribution. 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) (noting State housing targets are expected to be revised upwards in 2024)

A city of great places	Objective 12: Great places that bring people together.	This Planning Proposal will support a mix of land uses and activities in a highly accessible location, supporting good social connections. The provision of through site links and open space in the proposal also contributes to this objective, as well as through the part dedication of land to facilitate a multi-purpose community facility.
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 times 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 adjacent to a railway station and bus interchange. 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 Greater Sydney Region Plan and sets the 20-year vision for the District through 'Planning Priorities' that are linked to the Region Plan. Key priorities of the District Plan which this Planning Proposal would give effect to are elaborated below:

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 and the bus interchange.

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 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 district. Noting that 16 per cent of the Eastern Harbour 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 (Eastern City District Plan, pg. 29).

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 (now) Department of Planning, Housing and Infrastructure (**DPHI**) (noting that State housing targets are likely to be updated and increased in numbers this year). The proposal will support the provision of circa 275 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 (now) DPHI (since 2018), issued by the GSC in their letter of support to Woollahra Council on their LSPS (dated 12 March 2020), indicates a projected need of 500-600 dwellings from 2021 to 2026. 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 pressure 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 in the overall Woollahra LGA (i.e. apartments).

The proposal also looks to concentrate new housing so as to optimise the use of existing infrastructure (being the Edgecliff railway station and bus interchange). 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, community use, 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 with 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 the potential for job self-containment in the LGA.
- The proposal supports additional residential development in the Edgecliff 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.

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

Objective 14 – A Metropolis of Three Cities – integrated land use and transport creates walkable and 30-minute cities.

The Planning Proposal introduces residential uses on the site and expands on commercial office, medical, community 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 the site underpins the notion of a 30-minute city.

Planning Priority E19 – Reducing carbon emissions and managing energy, water and waste efficiently.

Objective 33 – A low-carbon city contributes to net-zero emissions by 2050 and mitigates climate change.

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 40% reduction in water use. The proposal is also consistent with the principles of Transit Orientated Development in that new employment is provided in a highly accessible location, thus reducing reliance on the private motor vehicle.

Q4. Is the Planning Proposal consistent with a council LSPS that has been endorsed by the Planning Secretary or GSC, or another endorsed local strategy or strategic plan?

Woollahra Local Strategic Planning Statement 2020

The Woollahra LSPS contains planning priorities and actions of which this Planning Proposal aligns with. The LSPS, which represents Council's 20-year vision and strategy for the LGA's future direction, and contains directions about infrastructure, liveability, productivity and sustainability. The LSPS draws from the Greater Sydney Commission's Greater Sydney Regional Plan and Eastern City District Plan and implements the planning priorities identified from these larger strategic documents at a local level.

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 Planning 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 1: Planning for integrated land use and transport for a healthy, connected community, and a 30-minute city.

Planning Priority 2: Planning for a community supported by infrastructure that fosters health, creativity, cultural activities, and social connections.

Planning Priority 3: Working in collaboration with our community, government, businesses, and organisations.

The Planning Proposal is consistent with Planning Priority 1, 2 and 3 as it:

- Represents a transport orientated development of scale with integrated land uses in a centre and adjacent to a railway station and bus interchange.
- 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.
- 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 4: Sustaining diverse housing choices in planned locations that enhance our lifestyles and fit in with our local character and scenic landscapes.

Planning Priority 6: 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 4 and 6 as it will provide a greater amount and choice of new homes (including an affordable housing contribution) 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 7: Supporting access to a range of employment opportunities and partnerships.

Planning Priority 8: 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 7 and 8 as it:

- Will support commercial floor space which given the zoning, can support a range of employment uses. This will support the retention and diversification of local employment opportunities.
- 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 13: 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 13 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 2032 – The Woollahra Community Strategic Plan

Woollahra 2032 was adopted by Council on 27 June 2022. 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 four focus areas. Each focus area is underpinned by a series of goals and strategies to support these goals. Those in which are supported by this Planning Proposal are identified in **Table 2** below.

Table 2 Applicable Themes and Actions in Woollahra 2032

Focus Area	Goal	Strategies	Comment
Social	A connected, harmonious and engaged community for	Provide, promote and facilitate a range of community projects, programs and events that support an inclusive, thriving and sustainable community.	The Planning Proposal provides significantly improved communal and public open spaces for social interaction, supported by access to services, transport and fine-grain retail. The proposal also proposes (part) dedication of land and developer

	all ages and abilities.		contributions, thereby contributing to a multi-purpose community facility.
	Well planned neighbourhoods.	Facilitate safe and active local centres which increase local activity, balance tourism demands with the impact on the community and are in line with local character	The Planning Proposal will elevate the existing function of Edgecliff through an expansion of commercial, community, medical and residential floor space, supporting an increase in local jobs and daily critical mass to support the vitality of the centre. This includes the provision of a multi-purpose community facility that will be managed by Council.
Economic	Liveable places	Enhance council provided community facilities to foster connections between people and place and enhance quality of life	
Environmental	Sustainable use of resources	Reduce greenhouse gas emissions.	The Planning 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 40% reduction in water use and a waste strategies that are consistent with the best practice guidelines from Green Star Buildings v1.

Draft Woollahra Integrated Transport Strategy

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 as follows:

- *Theme 1: Access, Mobility and Liveable Spaces.* The proposal supports a transit oriented development that will improve access to jobs, services and facilities. Access within the area will be improved through the provision of a permeable and DDA compliant through site link that connects the site to the Edgecliff transport interchange, Ocean Road and Trumper Park.
- *Theme 2: Public Transport.* 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).
- *Theme 3: Active Transport.* The proposal has been designed capable of providing 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).
- *Theme 4: Roads and Parking.* The proposal will co-locate of homes close to jobs, public transport, retail, open space and community facilities which will reduce demand for travel across the LGA to access these services and amenities (Target 8.2).

Draft Woollahra Active Transport Plan

The Draft Woollahra Active Transport Plan (**ATP**) affirms Council's commitment to making active transport a safe, easy and enjoyable, whilst also achieving emission reduction targets. The Planning Proposal aligns with the objectives of the Draft Active Transport Plan in that it will:

- Co-locate residential uses with commercial office, retail, medical, community uses and open space to support transit-orientated development and contribute to the creation of a walkable centre that provides homes in proximity to employment. both in Edgecliff and easily accessible via the transport interchange.
- Deliver a transit orientated development at a major transport node, thereby supporting active transport use, reduced car dependency and improved accessibility to transport services which provide direct and frequent access City of Sydney and Waverley (among other key areas).
- Provide high-quality residential development within Edgecliff, which will already well serviced by a range of amenities, services, employment opportunities, transport services and open space.
- Maximise opportunities for cycling to and from the site through the provision of bicycle parking and end of trip facilities.

Q5. Is the Planning Proposal consistent with any other applicable State and regional studies or strategies?

NSW State Plan 2021

The *NSW State Plan 2021* 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.
- 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 GSRP. It is underpinned by the *Building Momentum State Infrastructure Strategy 2018-2038* 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'.

Analysis (provided as part of **Appendix A**) identifies that Edgecliff Train Station is significantly underutilised during peak hour periods between in comparison to similarly located train stations to the north and the south of the Sydney CBD. This demonstrates that a much greater patronage could be accommodated by the existing public transport infrastructure available within Edgecliff.

Accordingly, the Planning Proposal looks to maximise the use of the existing Edgecliff Train 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. The proposal would also not result in any public transport capacity constraints.

This Planning Proposal

Future Transport Strategy

The *Future Transport Strategy 2056* is a 40-year vision for mobility in NSW, developed with the Greater Sydney Commission, the (now) DPHI, 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 services more accessible.
- Supporting the utilisation of the rail system, by providing significant employment opportunities in direct proximity to an existing heavy rail station.
- 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 the GSRP and *Future Transport Strategy 2056*. 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.

- Improve access within the area through the provision of a through site link that connects the site with the Edgecliff transport interchange, Ocean Road and Trumper Park.

Q6. Is the Planning Proposal consistent with applicable State Environment Planning Policies?

Yes. An assessment of the State Environmental Planning Policies (**SEPPs**) directly applicable to the Planning Proposal are identified in **Table 3**

Table 3 Consistency with State Environmental Planning Policies

SEPP	Consistency			Comment
	Yes	No	N/A	
State Environmental Planning Policy (Biodiversity and Conservation) 2021	✓			The site is located on land within the Sydney Harbour Catchment. It is not located in the foreshore or waterway area and is not zoned under this plan, where the majority of the provisions apply. The key matter for consideration is therefore the visibility from Sydney Harbour. Views and visual considerations (with respect of views of the proposal from the Harbour) are discussed in detail in Section 10.1 of the Planning Proposal Report.
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 (Housing) 2021			✓	Relevant to the Planning Proposal in so far that housing supply is provided and that the design quality of residential flat buildings (and the Apartment Design Guide) require careful consideration and assessment.
State Environmental Planning Policy (Industry and Employment) 2021			✓	Not relevant to proposed amendment. May be relevant to future development applications for signage at the site.
State Environmental Planning Policy (Housing) 2021	✓			The residential component of the Indicative design proposed under this Planning Proposal has been subject to assessment against the Housing SEPP and the Apartment Design Guide to demonstrate that development for residential purposes on the site can generate appropriate residential amenity (refer to the Urban Design Report at Appendix C). Any future detailed development on the site for residential purposes will be subject to reassessment against Housing SEPP and the Apartment Design Guide.
State Environmental Planning Policy (Planning Systems) 2021	✓			Schedule 1, Section 19 of the Planning Systems 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 that has a capital investment value of more than \$30 million for the purposes of residential accommodation and commercial premises.
State Environmental Planning Policy (Precincts—Central River City) 2021			✓	Not relevant to proposed LEP amendment.
State Environmental Planning Policy (Precincts—Eastern Harbour City) 2021			✓	Not relevant to proposed LEP amendment.
State Environmental Planning Policy (Precincts—Regional) 2021			✓	Not relevant to proposed LEP amendment.
State Environmental Planning Policy (Precincts—Western Parkland City) 2021			✓	Not relevant to proposed LEP amendment.

SEPP	Consistency			Comment
State Environmental Planning Policy (Primary Production) 2021			✓	Not relevant to proposed LEP amendment.
State Environmental Planning Policy (Resilience and Hazards) 2021	✓			The Resilience and Hazards SEPP will be considered as part of future DAs for the site.
State Environmental Planning Policy (Resources and Energy) 2021			✓	Not relevant to proposed LEP amendment.
State Environmental Planning Policy (Sustainable Buildings) 2022			✓	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 (Transport and Infrastructure) 2021	✓			- Chapter 2, Division 15 of the Transport and Infrastructure SEPP will apply given that the site is within an existing rail corridor. Concurrence will be required by Transport for NSW prior to the determination of any future DA. - Chapter 2, Division 17 of the Transport and Infrastructure SEPP will apply given that the proposal would be a traffic generating development and has frontage to a classified road. The future DA would need to be referred to Transport for NSW.

Q7. Is the Planning Proposal consistent with the applicable Section 9.1 Directions?

The proposal's consistency with applicable Section 9.1 Directions is assessed in **Table 4**.

Table 4 Assessment of Section 9.1 Directions

Ministerial Direction	Consistent			Comment
	Yes	No	N/A	
Focus Area 1: Planning Systems				
1.1 Implementation of Regional Plans	✓			The Planning Proposal is consistent with the GSRP and Eastern City District Plan, as discussed in this section.
1.2 Development of Aboriginal Land Council land			✓	The site is not on land that is owned by an Aboriginal Land Council.
1.3 Approval and Referral Requirements	✓			The proposed LEP amendments will require concurrence, consultation or referral of development applications to a Minister or public authority. Referral of the proposal to aviation authorities is expected as part of the Planning Proposal consultation.
1.4 Site Specific Provisions	✓			The Planning Proposal will not result in any unnecessarily restrictive site-specific planning controls. The extent of detail of the site-specific controls will appropriate to the scale and typology of the proposal.
1.4A Exclusion of Development Standards from Variation			✓	The Planning Proposal does not propose to introduce or alter an existing exclusion to clause 4.6 of the WLEP 2014.
Focus Area 1: Planning Systems – Place-based				
1.5 Parramatta Road Corridor Urban Transformation Strategy			✓	This direction is not applicable.
1.6 Implementation of North West Priority Growth Area Land Use and Infrastructure Implementation Plan			✓	This direction is not applicable.

Ministerial Direction	Consistent			Comment
1.7 Implementation of Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan			✓	This direction is not applicable.
1.8 Implementation of Wilton Priority Growth Area Interim Land Use and Infrastructure Implementation Plan			✓	This direction is not applicable.
1.9 Implementation of Glenfield to Macarthur Urban Renewal Corridor			✓	This direction is not applicable.
1.10 Implementation of Western Sydney Aerotropolis Plan			✓	This direction is not applicable.
1.11 Implementation of Bayside West Precincts 2036 Plan			✓	This direction is not applicable.
1.12 Implementation of Planning Principles for the Cooks Cove Precinct			✓	This direction is not applicable.
1.13 Implementation of St Leonards and Crows Nest 2036 Plan			✓	This direction is not applicable.
1.14 Implementation of Greater Macarthur 2040			✓	This direction is not applicable.
1.15 Implementation of the Pyrmont Peninsula Place Strategy			✓	This direction is not applicable.
1.16 North West Rail Link Corridor Strategy			✓	This direction is not applicable.
1.17 Implementation of the Bays West Place Strategy			✓	This direction is not applicable.
1.18 Implementation of the Macquarie Park Innovation Precinct			✓	This direction is not applicable.
1.19 Implementation of the Westmead Place Strategy			✓	This direction is not applicable.
1.20 Implementation of the Camellia-Rosehill Place Strategy			✓	This direction is not applicable.
1.21 Implementation of South West Growth Area Structure Plan			✓	This direction is not applicable.
1.22 Implementation of the Cherrybrook Station Place Strategy			✓	This direction is not applicable.
Focus Area 2: Design and Place				
Focus Area 3: Biodiversity and Conservation				
3.1 Conservation Zones	✓			The Planning Proposal will not be carried out within a conservation zone and there are no environmentally sensitive areas located within the vicinity of the site.
3.2 Heritage Conservation	✓			The objective of direction 2.3 is to conserve items, areas, objects and places of environmental heritage significance

Ministerial Direction	Consistent			Comment
				and indigenous heritage significance. There are no listed heritage items on the site of this Planning Proposal. Refer to Section 10.4 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.
3.3 Sydney Drinking Water Catchments			✓	This direction is not applicable.
3.4 Application of C2 and C3 Zones and Environmental Overlays in Far North Coast LEPs			✓	This direction is not applicable.
3.5 Recreation Vehicle Areas			✓	This direction is not applicable.
3.6 Strategic Conservation Planning	✓			The site is not within the vicinity of any land identified as avoided land or a strategic conservation area under the Biodiversity and Conservation SEPP.
3.7 Public Bushland	✓			The Planning Proposal will not have any impact on public bushland.
3.8 Willandra Lakes Region			✓	This direction is not applicable.
3.9 Sydney Harbour Foreshores and Waterways Area	✓			The site is located on land within the Sydney Harbour Catchment but is not located in the foreshore or waterway area. The Planning Proposal is consistent with direction 3.9 in that it will not result in any impact to the natural assets and unique environmental, visual, and cultural qualities of Sydney Harbour and its islands and foreshores. In particular, the Planning Proposal will not result in any unacceptable visual impacts as discussed further in Section 10.1 of the Planning Proposal Report.
3.10 Water Catchment Protection			✓	This direction is not applicable.
Focus Area 4: Resilience and Hazards				
4.1 Flooding			✓	The site is not located on land in a flood planning area.
4.2 Coastal Management			✓	This direction is not applicable.
4.3 Planning for Bushfire Protection			✓	This direction is not applicable.
4.4 Remediation of Contaminated Land			✓	Contamination Planning Proposal has been considered in Section 10.7 of the Planning Proposal Report. Ultimately, the site is considered to represent a low contamination risk and is suitable for future redevelopment at the site.
4.5 Acid Sulfate Soils	✓			Under the WLEP 2014, 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.
4.6 Mine Subsidence and Unstable Land			✓	The site is not identified as mine subsidence or unstable land.
Focus Area 5: Transport and Infrastructure				
5.1 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 5.1 as it: Significantly improves access to housing and jobs by public location give its proximity to Edgecliff Railway Station and bus interchange.

Ministerial Direction	Consistent			Comment
				- Increases retail, medical uses and community facilities in proximity public transport, reducing the need for car dependence and reducing car-generated trips. - Will contribute to a significant critical mass (i.e. residents, workers and visitors) to support the viability of rail and bus services.
5.2 Reserving Land for Public Purposes	✓			This Planning Proposal does not propose to create, alter or remove a zone or a provision relating to the provision of public services and facilities by reserving land for public purposes.
5.3 Development Near Regulated Airports and Defence Airfields	✓			Referral of the proposal to aviation authorities is expected as part of the Planning Proposal consultation.
5.4 Shooting Ranges			✓	This direction is not applicable.
Focus Area 6: Housing				
6.1 Residential Zones	✓			The E1 Local Centre 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. - Will be subject to detailed design to ensure it is of high quality design. - Contributes a component of affordable housing as part of the Planning Proposal. - Delivery or monetary contribution of 5% of the new residential GFA as affordable housing.
6.2 Caravan Parks and Manufactured Home Estates			✓	This direction is not applicable.
Focus Area 7: Industry and Employment				
7.1 Employment Zones	✓			This direction is applicable because the site is located in an employment zone (E1 Local Centre). This Planning Proposal gives effect to this direction because it: - Will provide a suite of medical, community and commercial (including retail) 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 E1 zone. - Does not seek to remove or change the area and location of the E1 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. - Through additional job and housing creation, provide for additional daily critical mass to sustain the vitality of other services in the Edgecliff Centre.
7.2 Reduction in non-hosted short-term rental accommodation period			✓	This direction is not applicable.

Ministerial Direction	Consistent			Comment
7.3 Commercial and Retail Development along the Pacific Highway, North Coast			✓	This direction is not applicable.
Focus Area 8: Resources and Energy				
8.1 Mining, Petroleum Production and Extractive Industries			✓	This direction is not applicable.
Focus Area 9: Primary Production				
9.1 Rural Zones			✓	This direction is not applicable.
9.2 Rural Lands			✓	This direction is not applicable.
9.3 Oyster Aquaculture			✓	This direction is not applicable.
9.4 Farmland of State and Regional Significance on the NSW Far North Coast			✓	This direction is not applicable.

Q8. 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.

Q9. Are there any other likely environmental effects as a result of the Planning Proposal and how are they proposed to be managed?

A detailed assessment of the environmental effects as a result of this proposal is identified in **Section 10.0** in the Planning Proposal Report. Relevant management measures are identified where appropriate and, on this basis, no unacceptable impacts are likely to result from this Planning Proposal or future development on the site.

Q10. Has the Planning Proposal adequately addressed any social and economic effects?

Yes. The economic and social impacts arising from the Planning Proposal have been fully identified and addressed by specialised reports which are assessed at **Section 9.8**. The Planning Proposal will contribute to a number of positive social and economic effects, including:

- The proposal will have a construction cost of circa \$488 million, with total economic activity associated with construction estimated at 1.5 billion. This includes:
 - \$596 million of economic activity in production induced multiplier effects.
 - \$381 million in consumption induced effects.
 - 1,160 jobs directly in design and construction.
- An additional 3,142 jobs through production induced and consumption induced multiplier impacts.
- The proposal when or close to full occupation will generate an estimated 785 jobs. This is a net increase of 364 over the current operation. This will include:
 - 478 full and part time retail jobs.
 - 478 predominantly full-time jobs associated with the office floor space.
 - 56 predominantly full-time jobs associated with the community uses.
- The creation of new and modernised employment space closer to and more accessible to home.
- The replacement of an existing, tired 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.
- 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.
- The site once developed will contribute \$77.2 million to regional domestic product. This is an \$32.2 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 \$6.5 million per year.

Q11. 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 be 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.
- 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 DPHI.

Q12. What are the views of state and federal public authorities and government agencies consulted in order to inform 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.

Where necessary, further consultation with relevant authorities will be undertaken as required in accordance with the Gateway Determination. State and Commonwealth authorities will have the opportunity to provide comment on the Planning Proposal as part of its formal exhibition.

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.

Summary

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.
- Protects but modernises commercial 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 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.
 - 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).
 - 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+).
- The proposal has been subject to a broader environmental assessment (refer to **Section 9.0**) which has determined that there are no unacceptable impacts are likely to result from this Planning Proposal or future development on the site.
- 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. Local benefits and open space are also proposed.