

Vaucluse West Residents Association

Draft Submission for the Edgecliff Commercial Centre (ECC) Planning and Urban Design Strategy (the Strategy).

Major Criticisms/Recommendations

- The labelling of this strategic planning document as the “Draft Edgecliff Commercial Centre Planning and Urban Design Strategy” (the Strategy) is misleading for readers. The proposed redevelopment extends well beyond Edgecliff Centre. It should be redrafted and presented as a precinct plan.
- The proposed density uplift is not necessary to meet net new dwelling targets out to 2036. To date, 779 new dwellings of the state government agreed 2016 - 2036 target of 1,200 net new dwellings have been delivered and/or improved. This Strategy will unnecessarily add at least 1,250 net new dwellings to the 7th month densely populated Local Government Area (LGA) in NSW.
- Action 7 of the Draft Housing Strategy says Council will “investigate innovative developer contributions schemes to deliver community infrastructure that will meet increased demand generated by new housing and development uplift.” These investigations must be conducted before this Strategy is approved. The private owner of the Edgecliff Centre should not be given a 40 storey uplift (ie one building of 26 storeys and one building of 14 storeys) without the Council receiving adequate compensation to accommodate necessary new community infrastructure. Numerous other property owners are also being granted increased height limits of multiple storeys.
- The surrounding areas won’t be able to cope with the increase in traffic volume. New South Head (NSH) Road between New Beach Road and Ocean Avenue had to be turned into a permanent clearway to accommodate existing traffic flows, [estimated](#) to be around 70,000 plus cars a day. The increase in the number of cars and the parking provisions for the proposed new apartment dwellings will also make the surrounding streets far too congested and likely unworkable. Only limited and inadequate improvements to the road network are put forward in the Strategy.
- The Strategy does not provide for adequate new community infrastructure or private amenities. The recommendations of the Woollahra Community Facilities Study 2019 should be incorporated into the Strategy. Options for new schools, TAFEs, medical centres and other state government services must also be explored to meet an anticipated population increase of 3,000 plus.
- The Longhurst Group, which bought the Edgecliff Centre in 2019, said that any [redevelopment plans](#) for Edgecliff Centre should also incorporate the Eastpoint Centre - owned by the family who founded Mirvac. This suggestion seems sensible but it hasn’t been taken up in the Strategy.

- Rezoning land from RE2 Private Recreation to B4 Mixed Use makes no sense. The increase in proposed density needs to be supported by increased opportunities for both private/public recreation and amenities.
- The Strategy proposes removing important private amenities like the petrol station and the carwash. The Woollahra LGA has only 4 petrol stations and other useful private amenities along New South Head Road at Edgecliff (eg the car servicing garage, the tyre replacement garage and the budget motel) will also be removed if the Strategy is implemented. These types of amenities are not widely available in the rest of the municipality.
- The retention of a budget motel is also likely important for addressing Woollahra's temporary homelessness issues. Homelessness is increasing across Greater Sydney and the 2016 census estimated that in the Woollahra LGA 165 people found themselves in this predicament because of issues like domestic violence, a shortage of affordable housing, unemployment, mental illness, substance abuse and family breakdown.
- The Strategy does not protect enough heritage/local character buildings on NSH Road and fails to protect the ambience of the surrounding HCAs. This submission identifies several candidates for heritage/local character protection that have been overlooked. A thorough heritage/local character audit, informed by community input, must be conducted before this Strategy is approved.
- The incorporation of a public plaza in the redevelopment of the Edgecliff Centre is a good idea but it is not reflected in Figure 22 of the Strategy, which shows a 3D diagram of the proposed massing and heights of the new buildings. By necessity, the inclusion of a plaza will mean that proposed new towers will have to be moved further back from NSH Road towards New McLean Street. Their anticipated placement will cast even greater than anticipated shadows over the surrounding Heritage Conservation Area (HCA) and popular Trumper Park.
- The greenery and active transport improvements are welcome but unlikely to be utilised because of the very hilly terrain and their proximity to a busy freeway like road.
- The provision for affordable housing does not address the concerns about the lack of affordable housing in the Woollahra LGA as identified in the [draft Woollahra Housing Strategy](#).

Detailed Analysis

Heritage

The Strategy says that its goals are to:

Conserve and enhance existing heritage and transition the built form sensitively to the adjoining heritage conservation areas.

Sensitively respond to heritage items and heritage conservation areas by lowering street wall heights and encourage the location of vehicle entries on secondary streets.

The Strategy only nominates one new heritage item for investigation, the Cadry Carpets building, on the corner of NSH Road and Glenmore Road. But the ambience of this historic building will not be protected with the Strategy proposing a 10 storey building to be built next door and 7 to 8 storey buildings opposite (Building L and Building K on the diagram below).



Figure 22 in the Strategy: An extract of the 3D model prepared by SJB for their analysis of the preferred development scenario which illustrates the proposed amalgamation pattern, floor space, maximum building heights and street wall heights. 3D modelling of indicative massing.

Summary of suggested LEP amendments

The following table (Table 4) identifies the indicative maximum building height, maximum FSR, minimum non-residential FSR and street wall height for the suggested amalgamated sites (Figure 36).

Disclaimer: The values in Table 4 are indicative only. Any increase in density on these sites will be subject to the development meeting the criteria identified in Chapter 6 of this report.



Figure 36. Suggested amalgamation pattern for the ECC (SJB 2018 modified by Council staff)

Table 4. Indicative maximum building heights and FSRs (SJB 2018)

Site	Existing HOB	Existing HOB in storeys (indicative)	Proposed HOB incentive*	Proposed building height in storeys	Existing FSR	Proposed FSR incentive*	Proposed non-residential FSR*
A	6.5m	2 storeys	21m	6 storeys	0.5:1	2.0:1	N/A
B	10.5m	3 storeys	40m	12 storeys	N/A	5.0:1	N/A
C	14.5m	4 storeys	21m	6 storeys	1.5:1	3.5:1	N/A
D	14.5m	4 storeys	21m	6 storeys	1.5:1	4.0:1	N/A
E	14.5m	4 storeys	34m	10 storeys	1.5:1	3.5:1	N/A
F	9.5m	2 storeys	20m	5 storeys	1.5:1	3.5:1	N/A
G	14.5m	4 storeys	28m	8 storeys	1.5:1	3.0:1	N/A
H	14.5m	4 storeys	28m	8 storeys	1.5:1	3.0:1	N/A
I	14.5m	4 storeys	28m	8 storeys	1.5:1	3.0:1	N/A
J	14.5m	4 storeys	23m	6 storeys	1.5:1	4.0:1	N/A
K	23.5m	7 storeys	24m	7 storeys	1.5:1	2.5:1	N/A
L	9.5m/ 14.5m	4 storeys	34m	10 storeys	1.5:1	2.5:1	1:1
M	14.5m	4 storeys	34m	10 storeys	2.0:1	2.5:1	2:1
N	14.5m	4 storeys	34m	10 storeys	2.5:1	4.5:1	2:1
O	14.5m	4 storeys	34m	10 storeys	2.5:1	4.0:1	2:1
P	14.5m	4 storeys	39m	11 storeys	1.5:1	3.5:1	2:1
Q	20.5m	6 storeys	38m	11 storeys	2:1	4.5:1	N/A
R	6m/26m	7-8 storeys	86m	26 storeys	2.5:1	7.5:1	3:1
S	8m	2 storeys	16m	4 storeys	1.5:1	2.5:1	N/A
T	5m/ 19m	5-7 storeys	To be investigated	To be investigated	2.5:1	To be investigated	To be investigated



410 x 480

Cady's Carpet Shop Building, corner of Glenmore and New South Head Roads

The preservation of other significant heritage/character buildings have been overlooked. See below, for example:



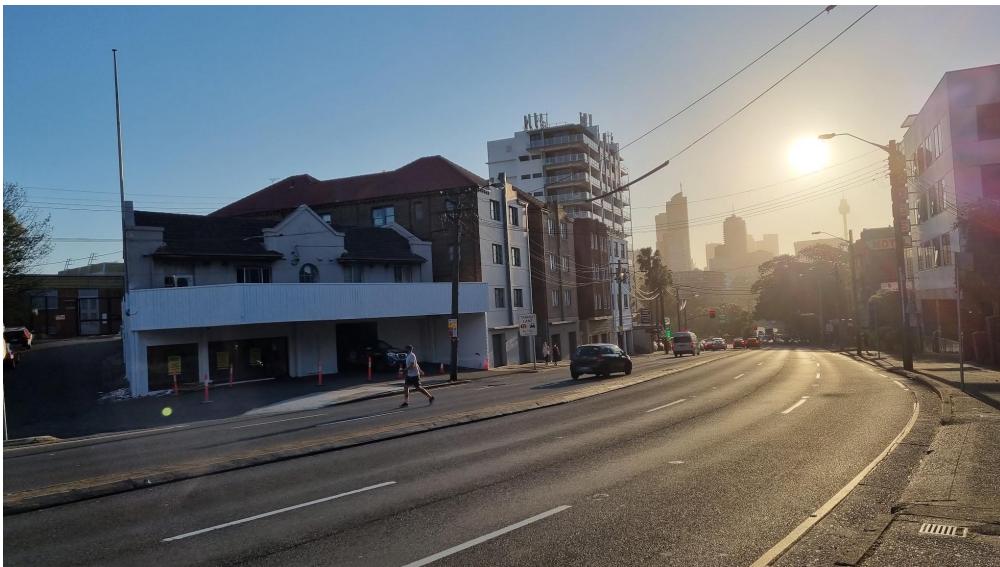
The Strategy proposes replacing this Art Deco building on the corner of Mona Road and New South Head Road with a 6 storey (23 metres) building. (Building J on Figure 22)



These two interwar apartment buildings (Buildings C & D on Figure 22) on the corner of New Beach Road and Oswald Avenue, respectively, will be amalgamated and replaced with a 6 storey (21 metre) buildings.



This well maintained interwar 3 -4 storey building on the corner of Oswald Avenue and New South Head Road will be rezoned for an 8 storey (28 metres) building. (Building G on Figure 22).



This character building on the corner of Glenmore Road and New South Road will be rezoned under an amalgamation of the site that will see 6 to 10 storeys (34 metres). Building E on Figure 22: 3D modeling of indicative massing.



The ambience of the Paddington Conservation Area behind the Edgecliff Centre and Trumper Park will also be impacted by the 26 storeys (86 metres) and 14 storey buildings proposed for Edgecliff Centre (Building R, Figure 22).



The charming heritage conservation streets off New McLean Street will be overshadowed by the two towers proposed for Edgecliff Centre.



Two towers will loom over the low-rise residential area of New McLean Street, robbing Trumper Park of morning sun (between the houses of 9 am and 11 am), particularly in the winter months. The will need to be set back further from NSH Road than the existing Edgecliff Centre because of the proposed addition of a public plaza on the NSH Road street frontage.





Open space opposite the soon to be heritage-listed Rushcutters Bay Park will be replaced by two buildings - one of 12 storeys (40 metres) on the current Crystal Carwash site and one of 6 storeys (21 metres) buildings on the current petrol station site. (Buildings B & A in Figure 22).



The Planning Proposal for this block (Building K on Figure 22) at 80-84 & 90 New South Head Road was approved by Council on 10 October 2016. The decision at the time was controversial because it increased the maximum building height from 14.5 m for 80-84 NSH Rd and from 20.5m to 23.5 on 90 NSH Rd, bringing the height to 23.5 m (7 storeys) over the entire site and increasing the maximum floor space ratio (FSR) from 1.5:1 to 2.0:1.

As the current proposed design for the building illustrates, the new development will overlook the Heritage Conservation Area (HCA) of Mona Road, Darling Point. It also directly adjoins three heritage items - no. 9, 11 and 15 Mona Road.

The design of the new development highlights how developers will orient their buildings away from the busy street to capture the harbour views; thus diminishing the look of the NSH streetscape. The preferred orientation of the buildings will also lead to the surrounding HCAs being overlooked and overshadowed. The Strategy also doesn't mention that Mona Road will be the main entry point for parking for around 40 new dwellings for this development and for a similar number of dwellings proposed for the block on the other side of Mona Road (Building J on Figure 22).

Active Street Frontages

The Strategy says it wants to "encourage active street frontages to activate the public domain, increase pedestrian amenity, create visual interest and increase passive surveillance in the area."

This objective sounds good in theory but, in reality, this part of New South Head Road is essentially a freeway. A few years ago, parking along the street was removed to create a 6 lane road to accommodate the 70,000 cars (2016 estimate) that pass through this section of New South Head Road on a daily basis. Sitting outside on such a busy road is unlikely to be attractive for pedestrians and parking is already problematic for the existing business because of the permanent clearway provisions.

Lack of Community Infrastructure in Strategy and Loss of Private Amenities

The Strategy says that it will require new development to be accompanied by community infrastructure, but it is vague about what will actually be demanded.

A number of valuable private amenities are on sites that will be rezoned for B4 Mixed Used and/or proposed for higher density:

- **The current petrol station** (Building A in Figure 22) will be replaced by a 6 storey residential apartment building. Some commercial space is proposed for the ground floor.
- **The current Crystal Carwash** (Building B in Figure 22), currently zoned RE2 - Private Recreation, will be rezoned B4 - Mixed Use, with a 12 storey building proposed for the site. Some commercial space on the ground floor.
- **The Pate & Vernoy service garage** (bottom floor of Building G in Figure 22) will be replaced by an * storey building. No mention about whether it will be re-accommodated in the new development?
- **The Bob Jane T-Mart** (Building E on the corner of Glenmore Road and New South Head Road) will be demolished and replaced by 6 storey building. No mention about whether it will be re-accommodated in the new development?
- **The Edgecliff Lodge Motel** (Building I) will be replaced by an 8 storey apartment building.

Recommendations for filling gaps in community, cultural and creative facilities have not been incorporated into the Strategy

The Woollahra Community Facilities Study 2019, which was endorsed by Council on 29 September 2020, identified a gap in the delivery of community, cultural and creative facilities:

- *There is a need for more flexible, multipurpose and adaptable facilities to cater for a range of community needs.*
- *There are currently no integrated multipurpose facilities in Woollahra.*
- *Provision of libraries is generally sufficient. However, there are challenges with each with regard to capacity and future usage.*
- *There is a lack of provision for cultural and creative facilities. However, there are imminent opportunities in the future to address this gap.*

The Woollahra LGA also has no indoor sports complexes. Council proposals to incorporate hard surface sporting areas like the skate park in Ruscutters Bay Park, for example, have caused much community angst because of their encroachment of increasingly popular green space.

Given the projected increase in net new dwellings of 1,250 plus, the pressure to provide better and more varied community facilities will only increase.

Transport and Traffic

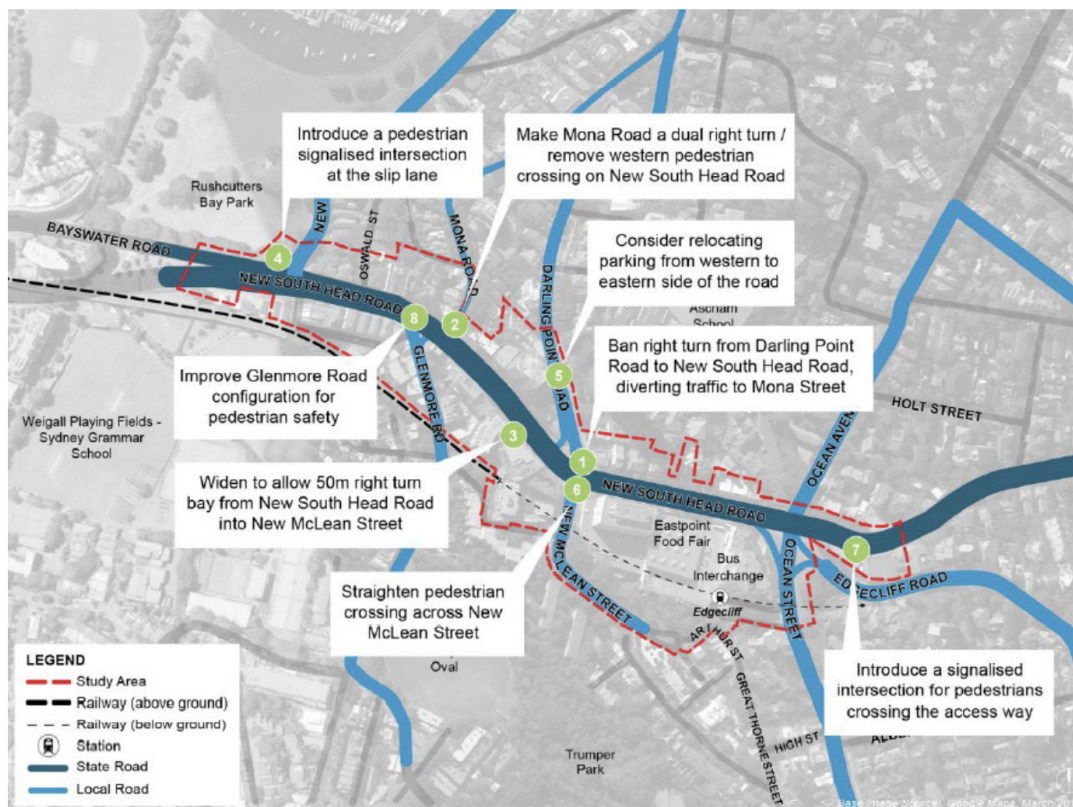


Figure 34. Proposed transport infrastructure improvements (SCT 2019)

The objectives of the Strategy are to:

- *Mitigate the traffic impacts of development uplift through infrastructure upgrades, encouragement of active transport and reduction in car parking requirements for smaller apartments.*

Whilst the Edgecliff Centre is a key public transport interchange for the Woollahra municipality, the surrounding terrain is very hilly and not easily walkable for older residents or people with movement disabilities.

Expecting people to give up their cars will likely prove challenging. The Strategy notes, for example, that car ownership in the Edgecliff area is high (46.5% of the population). The increase in the number of cars from the proposed new density is likely to make the streets off New South Head Road unworkable in terms of parking and congestion.

The Strategy proposes, for example, that traffic be redirected to Mona Road to prevent traffic turning right onto New South Head Road at Darling Point Road. But Mona Road will also have to accommodate additional traffic from the proposed two new buildings (7 and 6 storeys, Buildings K & J on Figure 22) on the corner of Mona and New South Head Road. The additional volume of car traffic in and out of this road is likely to make the intersection too congested.

Similarly, the Strategy's proposal for an 11 storey building (38 metres) on the corner of Darling Point Road and NSH Road (Building Q on Figure 22) will detrimentally impact traffic flows in this section of Darling Point Road. Access to the garages for the proposed new buildings is also likely to be tricky because of the street's unusual topography.

The Plan proposes reducing existing parking controls by capping parking for the Commercial Core to be no more than currently provided and decreasing the maximum parking rate for units to 0.3 spaces for studios and 1 bedroom units while excepting new residential flat buildings from the residential parking scheme. More clarity is required about what these proposed controls actually mean for parking pressures on the surrounding streets. Will new residents be offered parking permits, for example? Will new residents be banned from owning cars?

Chapter E1 of the Woollahra DCP 2015 includes "controls that require development to provide appropriate electrical infrastructure to facilitate the installation of electric vehicle charging points, and green travel plans to encourage active and public transport." Consequently, the Strategy's proposal to remove a petrol station, carwash and service garages, all areas where charging stations could be accommodated in the future, must be reconsidered.

The Strategy notes at "the time of drafting this Strategy, Council is preparing an Active Transport Plan for the Woollahra LGA. The outcomes of the Plan will be incorporated into this Strategy as the concepts are progressed." These recommendations of the Active Transport Plan must be incorporated into the Strategy before it's approved.

Affordable Housing

The Strategy proposes requiring new development to provide affordable housing for a minimum of 5% of the additional residential GFA achieved. But the 5% target is below the District Plan target of allocating 5-10% of new residential floor space as affordable rental housing.

Clarification is also required about how the 5% target interacts with key State Environmental Planning Policies (SEPPs) that affect affordable housing supply and offer developers FSR bonus for providing it:

- SEPP No. 70 – Affordable Housing (Revised Schemes)
- SEPP (Affordable Rental Housing) 2009

The recently released [draft Housing Strategy](#) paints a very distressing picture of housing affordability in the Woollahra municipality. It notes, for example, that:

While demand for social and affordable housing in Woollahra is lower than the Sydney average, there is a significant shortfall in both these housing types. The NSW Family and Community Services (FACS) reported that, in 2016, nearly all low income households in the Woollahra LGA were in rental stress and over half low income households were in mortgage stress.

Currently there is very little affordable or social housing stock in the Woollahra LGA. In 2016 there were only 140 social and affordable dwellings. The Woollahra LGA does not have housing specifically for indigenous communities. There are significant waiting lists and waiting times to access social housing in the Eastern suburbs area.

For affordable rental housing, analysis by SGS Economics and Planning identified a gap of at least 1,900 dwellings. Analysis by SGS Economics and Planning estimates that based on prices rising faster than wages, demand for social and affordable housing is likely to increase.

Analysis by SGS Economics and Planning (2020) also suggests that teachers, both primary and secondary, are the largest group of key workers in the Woollahra LGA, and that carers and nurses are also relatively common. Both of these groups are typically on moderate incomes and according the Report have difficulty finding affordable access housing in and around Woollahra. The Report notes that the ability of businesses and critical services to access a suitable labour pool could be impacted by the lack of affordable housing.

Arguably, the Plan prioritises expensive housing over affordable housing because the proposed towers for Edgecliff Centre will offer high in demand spectacular harbour views (see below).

