

Dear Ms Upton

We are writing to you to implore you to act now on behalf of residents fighting overdevelopment in the Woollahra LGA.

WITHDRAW THE TARGETS

The Greater Sydney Commission (GSC) set new dwelling targets for Woollahra of 300 (2016 – 2021) and 500 (2021 – 2026):

“The housing supply targets were developed with reference to a number of different data and information sets including the NSW Department of Planning, Industry and Environment’s (DPIE’s) dwelling projections and housing supply forecasts; the NSW Intergenerational Report; Housing Market Demand Areas; housing market preferences; and a robust analysis of existing and future State and local infrastructure capacity.” [\[1\]](#)

Woollahra Council unanimously resolved on 26 April 2021 to write to the State Government and others requesting that the above targets be withdrawn on the basis that the number of new dwellings has been overachieved as follows:

“Between November 2016 to October 2020 Woollahra Municipal Council has had construction commence, completed and approved for development of at least 779 additional new dwellings (including complying developments). With one year to conclude the period ending November 2021 Woollahra Council has at November 2020 exceeded the target by at least 259% or by over 479 additional new dwellings.”

Between November 2016 and November 2021 the 779 additional new dwellings number (above) has increased to 889 [\[2\]](#).

The Mayor of Woollahra Council emailed you on 17 May 2021 imploring you to engage with the issue and you responded by attaching a letter from Minister Stokes undated but received by you on 2 July 2021 which stated that the **“development of the housing strategy is the most appropriate means of identifying capacity within the LGA to meet the housing supply target”**. [\[3\]](#)

REVIEW THE CAPACITY OF WOOLLAHRA FOR MORE DEVELOPMENT

You must do better. You must insist that the GSC revisit the review undertaken in 2016 to determine the current capacity for Woollahra with the increased development. A cursory examination would reveal that roads are congested, parking is impossible, air quality is dangerous, school places are not available, and sewage and stormwater systems are imploding.

Residents are furious and becoming fed up with their concerns being ignored.

ALLOW EXEMPTIONS/CONTROL CHANGES AVAILABLE TO OTHER MUNICIPALITIES including: State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004

The Hon. Rob Stokes MP, Minister for Planning & Public Spaces has refused the unanimous resolution of Councillors on Woollahra Council on 22 February 2021 that Council write to the Minister and the Department of Planning, Industry and Environment (DPIE) seeking an exemption from the provision of State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 in the R2 Low Density Residential Woollahra LGA.

Woollahra (12 km²) has approximately 60,000 people resulting in a population density of 4,851 persons per km².

Minister Stokes agreed not to apply the Seniors SEPP uplift in:

1. his own electorate of Pittwater notwithstanding that the Northern Beaches Council comprises 254km² with approximately 65,000 residents resulting in a population density of 716 persons per km², and
2. the electorate of Hornsby held by the The Hon. Matt John Kean, Treasurer, and Minister for Energy and Environment where the Mayor of Hornsby Shire Council and Liberal Party stalwart The Hon. Phillip Ruddock AO advocated on behalf of residents. Hornsby Shire Council comprises 455km² with a population of approximately 152,000 resulting in a population density of 335 persons per km². Ministers Stokes and Kean care about the residents in their electorates. You seemingly do not.

Minimum lot size

As you are quite aware, it is not just the number of additional dwellings overwhelming our residents and infrastructure. It is also the scale and size of the developments. Given the enormous prices to acquire real estate within Woollahra, developers as well as residents are not building dwellings based on Woollahra's 2.3 average people per household. And they are certainly not building for the 1.7 people per household used by the NSW Department of Planning, Industry and Environment (DPIE) and Woollahra Council^[4] to determine the 1200 net additional dwellings projected for 2016 - 2036 in the Woollahra LGA (total population increase of 2050 between 2016-2036/ 1200 net additional dwellings of 1.7 people per dwelling). The same figures using the Woollahra LGA's average 2.23 persons per household results in a net increase of 919 additional dwellings NOT 1200. For example, the 3 additional dwelling units on Greycliffe Avenue as a result of two approved dual occupancies are each 4 bedroom 4.5 baths with swimming pools; sacrificing local character, open spaces, tree canopy, gardens and the natural environment serving as a pathway directly to Nielsen Park; all in pursuit of densification.

The existing minimum lot size is 460sqm and introducing a minimum lot size of 800sqm or 1200sqm would help manage the impacts of dual occupancy development in the R2 Low Density Residential Zone. Council resolved to seek amendment to its controls to enforce a minimum lot size for attached dual occupancies. DPIE expressed concerns that the amendments would reduce the number of lots eligible for attached dual occupancy development via both the development application and complying development certificate pathways, thereby reducing the capacity of housing supply.

We need to advocate on behalf of residents to prevent this form of over development which significantly encroaches on Woollahra's heritage, local character and landscape.

ADVOCATE FOR A HOUSING STRATEGY THAT SUPPORTS EXISTING DEVELOPMENT CONTROLS

State Government mandated Councils to provide a local Housing Strategy setting out how each Council would meet net additional dwelling targets. By November 2021 Woollahra Council will already have exceeded the 2021 and the 2026 targets with 889 new dwellings (construction/completed). These new developments occurred organically under the current development controls. Woollahra does NOT NEED a Housing Strategy that proposes new high rise for Edgecliff and Double Bay. We need a Housing Strategy that acknowledges the exceedance of targets and examines infrastructure require for further growth.

Councillors unanimously decided at the Council Meeting on 23 August 2021 to write to State Government and others requesting the withdrawal of targets. The GSC responded saying that the appropriate place to determine Woollahra's dwelling capacity was the Local Housing Strategy. The GSC letter dated 21 May 2021 states that:

*"..... the indicative range for the 6 – 10 year housing target, for the period 2021/22 to 2025/26, of 500 – 600 dwellings. This was to be tested and verified through DPIE's Local Housing Strategy approval process. The Council's target should also consider demands on state and local infrastructure, and the ability to support future growth. **The Commission's Letter of Support requested that Council test the indicative range through a preliminary assessment including the impacts of any relevant NSW Government investment decisions in consultation with State agencies.**"*

REJECT PLANNING PROPOSALS

The Edgecliff Planning Proposal encourages building heights of 17 to 89 metres (4 storeys to 26 storeys) which will overshadow local residential streets and parks and bring even more cars and congestion to the area. Existing private amenities like the carwash and the petrol station will be rezoned for 12 storey apartment buildings and no significant new community infrastructure is planned. The community consultation responses clearly support the position that residents do not want further intensification of development.

Commitments to protecting what our community values – lifestyle, heritage, local character, open spaces, boutique villages, tree canopy, gardens and the natural environment – are at odds with an already overburdened infrastructure organically growing by leaps and bounds let alone with an overburdened infrastructure asked to implement large scale development not consistent with a village

scale. Not to mention in our suburbs of Bellevue Hill, the % of separate housing is now down to 17% and we are not sustaining a diverse range of housing types and protecting low density villages and neighbourhoods which can easily support tree canopies and long-term sustainability outcomes.

Residents understand that the Housing Strategy and the proposed planning proposals for Edgecliff and Double Bay provide no guarantee that new development in Bellevue Hill, Double Bay, Rose Bay and Vaucluse will slow down.

Could you please let us know what you are doing to protect the interest of local residents.

Yours Sincerely

Luise Elsing
Mark Silcocks
Lucinda Regan
Harriet Price
Merrill Witt

CC
Darling Point Society
Double Bay Residents Association
Rose Bay Residents Association
The Paddington Society
Vaucluse West Residents Association
Queen Street and West Woollahra Association
Alex Greenwich MP - independent Member for Sydney
Dave Sharma MP – Member for Wentworth

[\[1\]](#) GSC letter dated 21 May 2021 attached to Woollahra Council Meeting Agenda for Meeting on 23 August 2021

[\[2\]](#) Minutes of Woollahra Council Meeting held on 25 October 2021

[\[3\]](#) Upton letter dated 7 July 2021 attached to Woollahra Council Meeting Agenda for Meeting on 23 August 2021

[\[4\]](#) Woollahra Council Environmental Planning Committee meeting on 18 October 2021 forecast 2026 – 2036 of 400