

Anthony Kunz
Senior Planner
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Dear Anthony,

Re: 136-148 New South Head Road, Edgecliff Application SSD-77608714-Mod-4

We live in an apartment building adjacent to the construction site at 136-148 New South Head Road, Edgecliff and write to oppose the modification application by Lendlease to extend construction hours because it will unreasonably impact residents and could set a harmful precedent.

Lendlease state that their intention is to "expedite construction in the most time efficient manner and reducing the period of construction¹" and claim that this will "avoid prolonging construction impacts on surrounding sensitive receivers²" (ie. local residents).

Instead of construction taking 31 months³ spread over 60 hours a week, Lendlease propose to speed it up so it takes 28-30 months spread over 71 hours a week. The modification application's aim of shortening the period of construction by increasing construction hours will also increase impacts on residents.

We note below specific responses to the modification application.

1. Ascham has boarders

Attachment B - Construction Noise Management Plan identifies Ascham School as an educational use and states that "as the proposed extended hours periods is outside of regular business/impacts to the educational and commercial receivers have not been directly addressed".

However, Ascham has around 100 boarders and so the impacts to them should be considered.

2. Residents need respite from constant noise barrage

The modification application seeks to increase construction hours from 60 hours per week to 71 hours per week - 11 hours more (see Table 1). This represents an increase in hours of almost 20 per cent⁴.

Instead of a day and a half of quiet respite from construction noise, Lendlease propose to reduce quiet time to just one day a week, and most importantly, start work at 6am during the week.

1 Letter - Extend Construction Hours Program Saving

2 ibid

3 Attachment B - Construction Noise Management Plan page 12.

4 The exact increase in hours is 18.33 per cent.

	Current			Proposed		
	Hours/day		Hours/week	Hours/day		Hours/week
Weekdays	7am - 6pm	11	55	6am - 6pm	12	60
Saturday	8am - 1pm	5	5	7am - 6pm	11	11
Total hours			60			71

Table 1. Proposed increase to construction hours (Condition D3)

The application also proposes to increase very noisy construction (pile driving etc) on Saturdays from 3 hours to 6 hours (see Table 2).

	Current			Proposed		
	Hours/day		Hours/week	Hours/day		Hours/week
Weekdays	9am - 12pm 2pm - 5pm	6	30	9am - 12pm 2pm - 5pm	6	30
Saturday	9am - 12pm	3	3	9am - 12pm 2pm - 5pm	6	6
Total hours			33			36

Table 2. Proposed increase to very noisy construction hours (Condition D7)

Attachment B - Construction Noise Management Plan states that the hours of 6-7am will be used for "prestart meetings, site safety inspections and general low noise generating construction works between 6-7am" (page 4).

Personal observation suggests that Lendlease is already starting work at 6am. On 1 July 2026 the lights were on in the office at 6:01am and the site gate was open and traffic cones were placed on the street at 6:33am (see Appendix A).

The Modification Report states that "the additional hour in the morning will be used for truck movements, the use of the crane for lifting materials, the use of the personnel hoist and other low noise generating activities" (page 9).

Attachment B - Construction Noise Management Plan states that noise levels over 75 dB(A) will highly affect recipients (page 9). It says that the crane (at 110 dB(A)), hoist (at 100 dB(A)) and trucks (at 110 dB(A)) will exceed noise limits for Receiver R1 at 3 Darling Point Road and the crane will exceed noise limits for Receiver R2 at the residential flats on New South Head Road.

Attachment B - Construction Noise Management Plan states that the crane is expected to exceed noise levels when operating at maximum capacity (page 14) but that silencing options may be investigated where feasible and within working limits. Given that Lendlease want to reduce the period of construction, it is difficult to envisage that the crane will be used at less than maximum

capacity at all times. The suggestion that silencing options *may* be investigated *where feasible and within working limits* suggests this is unlikely to occur.

It is difficult to see how these are "low noise generating activities". Residents impacted by the Lendlease need respite from construction noise. For these reasons the application to extend construction hours to 6am each morning should be refused.

3. Sleep is critical to health and well being

Proposing to start work at 6am on weekdays, while a considerable percentage of people are asleep, is unreasonable and could impact people's health and well being.

Resident's health should not be sacrificed to expedite construction in the most time efficient manner in order to maximise Lendlease's profit.

3. Reasons for proposed extension of construction hours

The Modification Report says the reasons for the proposed extension of construction hours include:

- avoiding compressing intense periods of work into a short amount of time
- decreasing the concentration of truck movements to alleviate traffic particularly during busy peak periods and minimise truck queuing, idling or circulating on local streets
- allow additional delivery hours for trucks thus improving safety for pedestrians, cyclists, school traffic and bus operators
- completing the development in a faster timeframe which will avoid prolonging construction impacts for surrounding sensitive receivers (page 9).

3.1 Compression of work

The request to extend construction hours does not "avoid compressing intense periods of work into a short amount of time". If construction is to be completed in a shorter timeframe it **must** be intensified.

3.2 Decrease concentration of truck movements

The Modification Report states "this application does not propose to increase the number of truck movements for the project as the proposed change is limited to extending the hours which will ultimately create a better distribution of delivery times across the day" (page 9).

As the same number of trucks will be required over a shorter timeframe, surely this must mean that there will need to be more trucks each day? It is difficult to see how this will decrease the concentration of trucks. It is more likely that there will be more trucks per day.

3.2.1 Truck noise in the neighbourhood at 6am

If the application to extend construction hours is approved the neighbourhood will have trucks (with a noise level of 110 dB(A)) queuing, idling or circulating on local streets at 6am in the morning, disturbing neighbourhoods, and on Saturday afternoon.

As trucks are required to enter Darling Point Road by turning right from the east bound lane at the intersection of New South Head Road and New Maclean Street, presumably this will mean trucks

coming from the west will travel down Ocean Street, placing further noise impacts on that street as well.

3.2.2 Travel to site to start earlier

Based on observation, traffic between 6am - 7am along New South Head Road is largely comprised of trucks and utes heading to work sites both east and west, presumably for a 7am start on their worksites. If construction hours were extended for Lendlease then vehicles, including trucks, will need to depart from their origins before 6am to arrive at the site by clock on time. The impact will be not just on local residents, but on those along the trip length.

3.3 Local traffic

The Modification Report states that allowing additional delivery hours for trucks accessing the site and reducing peak-hour truck activity will improve the safety of the site's surroundings for pedestrians, cyclists, school traffic and bus operators.

See the discussion at 3.1 Compression of work. We find it unlikely that there will be fewer trucks each day and consider it unlikely that the site's surroundings will be safer.

3.4 Construction timeframe

The document 'Extend Construction Hours Program Saving' states "the overall construction timeframe will be expedited resulting in a one (1) to three (3) month saving to construction program, and therefore the development will be completed in a faster timeframe which avoids prolonging construction impacts to surrounding sensitive receivers".

What this really means is that residents will have more construction impacts for a very slightly less period of time. If we assume that the construction will take 31 months⁵, if the modification application is approved it will increase impacts on residents by 20 per cent to reduce construction time by 3.2 per cent - 9.7 per cent. This is not a fair trade-off.

Construction beginning at 7am on weekdays with quiet Saturday afternoon for 31 months is better than construction beginning at 6am on weekdays with no respite on Saturday for 28 or 30 months.

4. Construction noise is qualitatively different to traffic noise

Construction noise is different to traffic noise. From within the apartment building closest to the development, most times the traffic noise is experienced as a gentle "swoosh" (except for some trucks, buses, motorcycles and "hot rods"). Sometimes we ask ourselves whether it's raining or just traffic noise. The construction noise however is very different - grinding, clanging, and unpredictable in nature. It puts your nerves on edge. There's an immediate sense of relaxation when construction stops.

The idea of construction noise beginning at 6am on weekdays for the next two years is distressing.

⁵ Attachment B - Construction Noise Management Plan, page 12

5. Pushing planning boundaries - not a good neighbour

It is of concern that Lendlease keep pushing to overturn Woollahra Council's planning provisions which are designed to protect residents well being and local area amenity.

So far Lendlease have pushed for more floor space (from 12 storeys to 17 storeys and then additional floor space by thinning the façade material), for extended construction hours, and for an illuminated crane sign which will increase visual pollution.

This does no engender confidence that Lendlease is a good neighbour. We cannot have faith that Lendlease will keep noise between 6am -7am to a minimum, given the way they continually push planning boundaries.

6. Setting a precedent for the Edgecliff Station Transit Oriented Precinct

Given that the NSW Government is currently creating a new State Environmental Planning Policy for the Edgecliff Station Transit Oriented, the neighbourhood is set to experience years of construction.

While Lendlease claim that extending the hours of construction will enable them to complete the project earlier, should their claim be accepted, it could set a precedent that means the local area will be subject to unremitting construction noise six days a week for years.

Refusing the application

Given the reasons outlined above, we oppose the application to extend construction hours and request the Department to refuse it.

Appendix 1. Work beginning at 6am

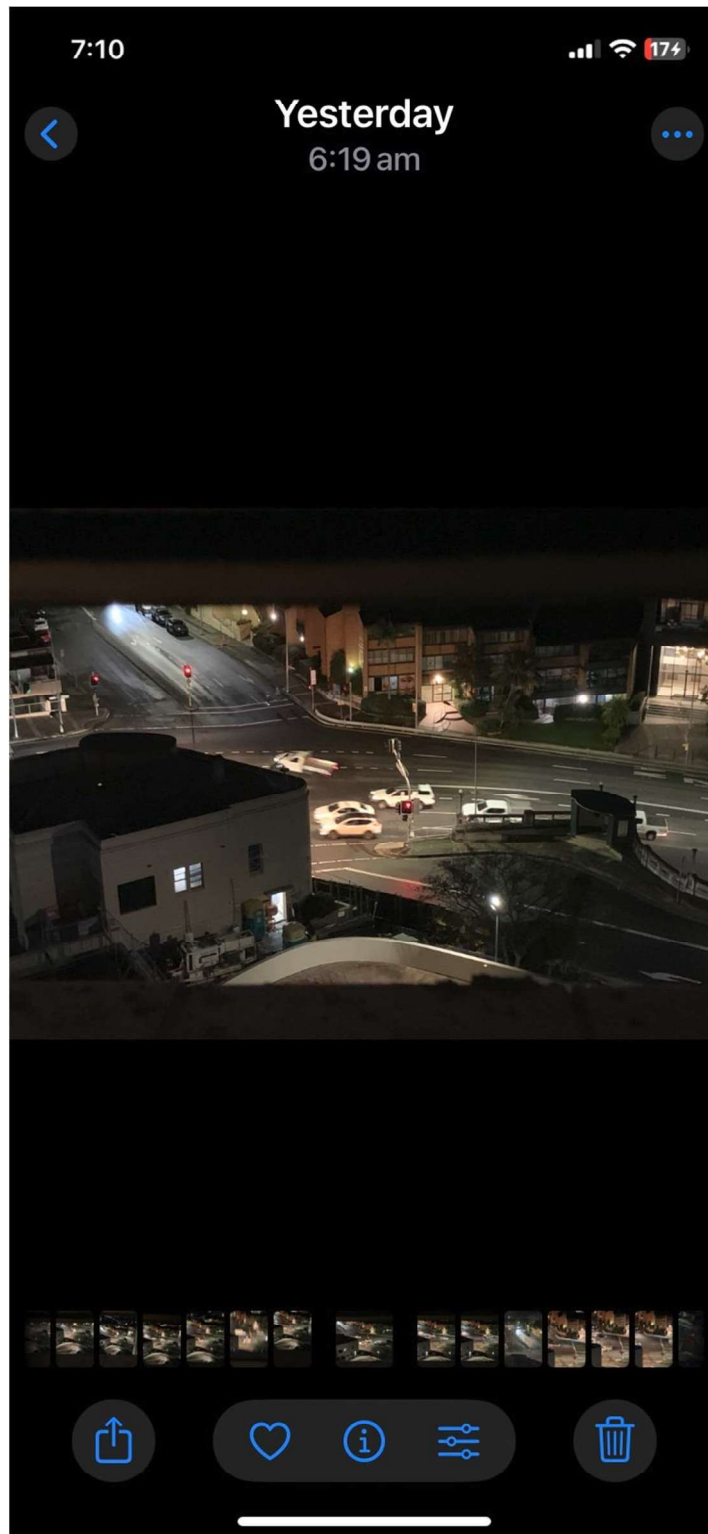


Figure 1. The office lights are on in the site office. There is a traffic cone placed on the road adjacent to the footpath at the intersection of the western side of New South Head Road and Darling Point Road.

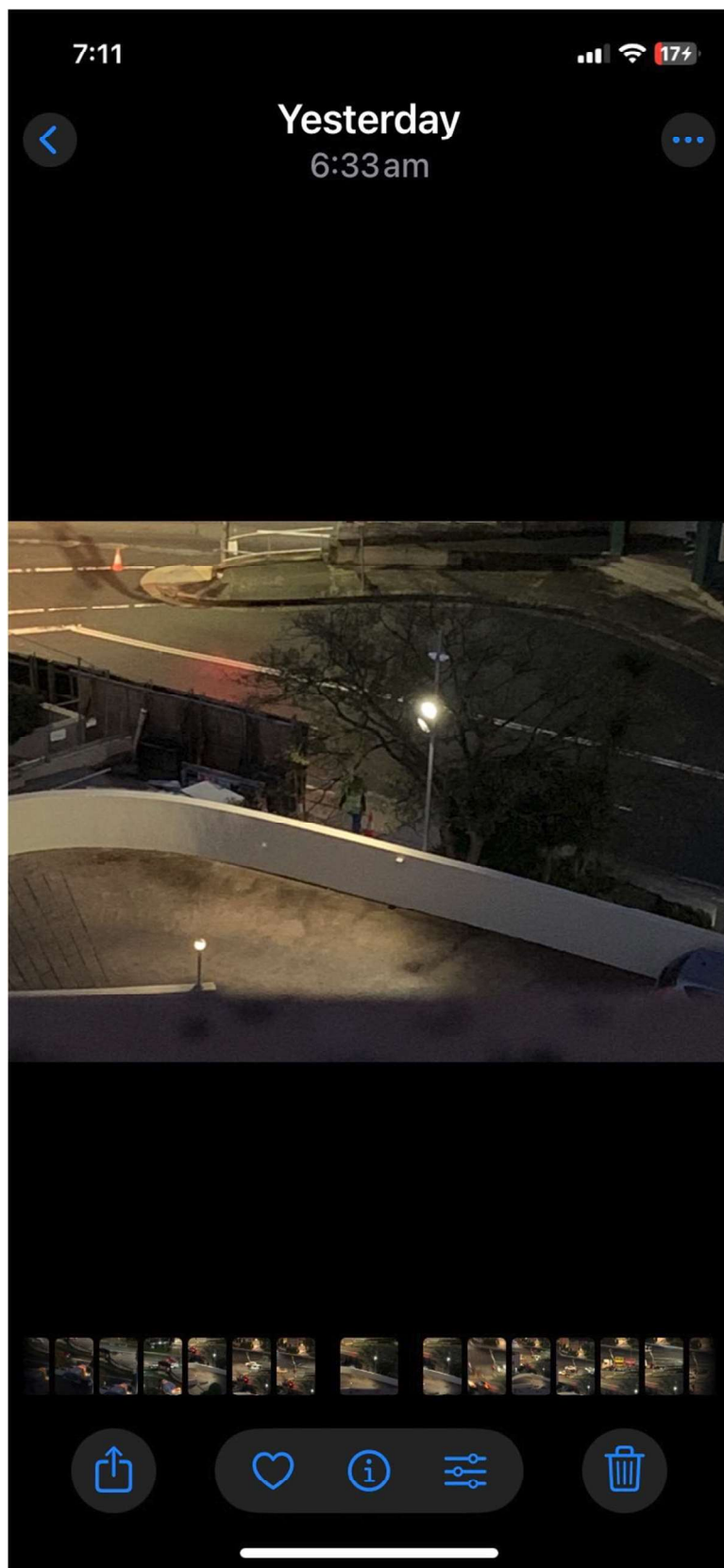


Figure 2. The site gates (need light in middle of photo) are open and a worker is moving a traffic cone. There is a traffic cone placed on the road adjacent to the footpath at the intersection of the western side of New South Head Road and Darling Point Road.