

22 March 2026

NSW Department of Planning, Housing and Infrastructure

Re: Submission on State Significant Development Application SSD-80626208 — 8-10 New McLean Street, Edgecliff

1. Introduction

I am a resident of Glebe Street, Edgecliff — immediately adjacent to New McLean Street — and a regular user of New McLean Street to access my property. I submit these comments in response to the State Significant Development Application (SSD-80626208) for a residential flat building at 8-10 New McLean Street, Edgecliff, lodged by Mount Street 4 Pty Ltd.

This submission is grounded in my direct, daily experience of the local streets and the intersection of New South Head Road, New McLean Street and Darling Point Road. I am not a traffic engineer and do not claim to be. What I can offer is the perspective of someone who has observed the conditions at this intersection over many years, and who has two clear and specific concerns about the impact this development — and the larger development it will ultimately enable — will have on existing and future residents.

A Transport Impact Assessment (TIA) has been prepared by JMT Consulting (dated 4 December 2025) in support of this application. While I note that it is the role of qualified traffic engineers to assess the technical merits of that document, I would observe that the TIA's conclusion of negligible traffic impact is reached by measuring additional New McLean Street traffic against the total volume of vehicles passing through the intersection on New South Head Road — approximately 5,000 vehicles per peak hour. That framing makes any local increment invisible. The relevant measure for existing residents is the proportional increase in vehicles using the specific constrained movements at a set of already dangerous choke points in and out of New McLean Street — against which even the TIA's conservative figures represent a meaningful increase.

I also note that the TIA assesses only 65 apartments on the western lot, yet the developer's own Urban Design and Architecture Development Summary discloses a full site development of 246 apartments and 281 car spaces. The TIA is therefore assessing less than 27% of the development that this site will ultimately generate. The subdivision of the site into two lots — itself part of this application — is the enabling step for that full development, and its cumulative traffic impact has not been assessed.

My two specific concerns, and the outcomes I am seeking, are set out below.

2. Issue 1 — Dangerous Traffic Choke Points in and out of New McLean Street

2.1 Background

The intersection of New South Head Road, New McLean Street and Darling Point Road is the sole access and egress point for New McLean Street onto the arterial road network. Based on the TIA's own traffic counts (Figure 6, Section 2.5), there are already 577 vehicle

movements specifically in and out of New McLean Street during the AM peak hour, and 635 in the PM peak hour. Full details of these movements are provided in the Appendix.

Within those movements, two specific right-turn manoeuvres are already operating as dangerous choke points. Neither is identified, analysed, or acknowledged anywhere in the TIA.

2.2 Choke Point 1 — Turning Right from New South Head Road into New McLean Street

Turning right from eastbound New South Head Road into New McLean Street — a movement made by 100 vehicles in the AM peak and 98 in the PM peak — requires use of a dedicated exit lane that is physically short, narrow and severely tapered. This lane holds no more than approximately two vehicles before queuing spills back into the live eastbound lanes of New South Head Road.

This is already a frightening place to be stopped and waiting for the signal. The danger is compounded by two conditions I have observed consistently over many years:

- Westbound traffic on New South Head Road regularly cuts the corner into the exit lane, squeezing stopped vehicles from their right.
- Eastbound through-traffic, unable to pass the queue, presses in from their left.

Drivers waiting to turn are physically hemmed in on both sides with no room to move. Any increase in the number of vehicles making this turn — even a modest one — means longer queues, more frequent spill-back into live arterial lanes, and a higher likelihood of a serious incident. The TIA forecasts 10 additional vehicle trips in the AM peak hour across the entire 65-apartment western building (Section 3.10.1). It provides no breakdown by turning movement and does not assess this lane at all. Yet if even a fraction of those additional trips involve this right-turn entry — which is the logical access movement for residents arriving from the CBD direction — the effect on a lane already backing into live arterial traffic is not trivial. That risk is simply not engaged with anywhere in the TIA.

2.3 Choke Point 2 — Turning Right from New McLean Street onto New South Head Road

Turning right out of New McLean Street onto eastbound New South Head Road — a movement made by 84 vehicles in the AM peak and 111 in the PM peak — requires crossing the path of traffic coming straight through from Darling Point Road southbound (27 vehicles AM peak, 40 PM peak). This is an inherently conflicted movement at a busy signalised intersection.

What makes it actively dangerous, based on regular observation over many years, is that Darling Point Road traffic frequently runs amber and red lights to clear the intersection. Vehicles turning right from New McLean Street, routinely face oncoming Darling Point Road vehicles that have entered the intersection against the red. The risk of collision at this point is real and recurring, not theoretical.

At 111 vehicles in the PM peak, this movement already generates close to two vehicles per minute facing this risk. The TIA forecasts 5 additional vehicle trips in the PM peak hour for the entire 65-apartment western building (Section 3.10.1) — and provides no analysis of how those trips distribute across individual turning movements. It does not assess this conflict at all. When the full 246-apartment development is realised, the increase across both movements will be proportionally larger still.

2.4 What the TIA Gets Wrong

The TIA concludes at Section 3.10.4 that the development will generate a negligible one vehicle movement every 6 to 12 minutes and that no adverse impacts or safety issues are expected at surrounding intersections. That conclusion is reached by comparing 5–10 additional vehicles against the total intersection volume of approximately 5,000 — a figure dominated by New South Head Road through-traffic that has nothing to do with New McLean Street.

When measured against the specific movements that matter — the two dangerous choke points described above — the picture is materially different. The TIA forecasts between 5 and 10 additional vehicle trips across the whole site in peak hours (Section 3.10.1). It provides no analysis of how those trips distribute across the specific right-turn entry and right-turn exit movements where capacity is already exhausted. Any additional vehicle demand on a lane that backs into arterial traffic within two car lengths, or on a movement already exposed to red-light running conflict, is not a negligible outcome — it is a meaningful increase in both congestion and danger at points already at or beyond their safe operating capacity (and that is before properly accounting for the full scale of the proposed development).

The TIA simply does not engage with these choke points at all. There is no swept path analysis of the right-turn entry lane, no assessment of queue spill-back risk onto New South Head Road, and no acknowledgement of the conflict movements and signal compliance issues at the right-turn exit. For an assessment that concludes there will be no safety issues at surrounding intersections, this is a significant omission.

2.5 Requested Outcomes — Issue 1

- That the consent authority require an independent safety and capacity assessment of the two choke point movements identified above — the right-turn entry from eastbound New South Head Road into New McLean Street, and the right-turn exit from New McLean Street onto eastbound New South Head Road — before consent is granted.
- That this independent assessment model the impact of the full 246-apartment development yield disclosed in the developer's Urban Design and Architecture Development Summary, not only the 65-apartment western building.
- That if consent is granted, a condition be imposed requiring the developer to fund any physical intersection improvements identified by that assessment as necessary to maintain safe operating conditions.
- If upgrades to the intersection cannot be achieved, that the number of net incremental car spaces included in the proposed development be limited to zero (in favour of *immediately accessible* train station access).

3. Issue 2 — On-Street Parking for Existing Residents

3.1 Background

New McLean Street and the surrounding streets in Edgecliff operate under a Woollahra Council resident parking permit scheme. On-street parking in these streets is already effectively at capacity. This is not simply a matter of inconvenience — for residents of Glebe Street and surrounding streets who do not have off-street parking, availability of a permit space is the difference between being able to park near their home or not.

The pressure on on-street parking in this area is not generated solely by residents. The proximity of Edgecliff transport interchange means the streets also absorb demand from commuters, interchange users and visitors to the commercial centre. The permit scheme exists to protect existing residents' access to parking against that broader pressure. It is already working at its limits.

The TIA is entirely silent on the impact of the development on on-street parking in New McLean Street and surrounding streets. This is a significant omission.

3.2 Three Specific Parking Concerns

I have three specific concerns about the impact of this development on the existing on-street parking environment:

First, the new driveway access proposed on New McLean Street will require the removal of one or more existing on-street parking spaces. The TIA does not identify how many spaces will be lost, nor does it propose any mechanism to offset that loss for existing residents. Any reduction in the number of kerbside spaces on an already-at-capacity street directly harms existing residents.

Second, the TIA proposes 16 visitor parking spaces within the development. If visitor demand to the new building regularly exceeds that provision — which is plausible for a 65-apartment building, let alone the 246-apartment development ultimately planned — the overflow will spill directly onto New McLean Street and adjacent permit streets, further compressing already scarce parking for existing residents.

Third, and most importantly, there is nothing in the application or the TIA that would prevent occupants of the new development from applying for and receiving resident parking permits for on-street spaces. A building that provides 134 car spaces in basement and lower-ground parking — including 2.0 allocated spaces per 3-bedroom apartment — should not also be entitled to on-street permit parking. The residents of this building will have already been provided with off-street parking as part of their purchase or lease. Allowing them to also hold on-street permits would directly displace existing residents who have no off-street alternative.

3.3 Requested Outcomes — Issue 2

- That a condition of consent be imposed, enforceable as a restriction on title, preventing occupants of the development from being granted resident parking permits for on-street parking on New McLean Street or any adjacent streets within the Woollahra Council permit parking zone.
 - That a condition be imposed requiring that any on-street parking spaces lost as a result of the new driveway crossing on New McLean Street be offset by the conversion of an equivalent number of visitor parking spaces within the development to publicly accessible resident permit spaces, so that existing residents suffer no net loss of available parking.
 - That the consent authority require the TIA to be amended to quantify the number of on-street spaces affected by the proposed driveway, and to include a parking impact assessment for New McLean Street and adjacent permit streets.
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4. Context: This Application Enables a Larger Development — and the TIA's Own Numbers Don't Add Up

As noted in the introduction, this application proposes the Torrens title subdivision of the 7,226 m² site into two lots, with a residential flat building on the western lot assessed in the TIA. The developer's own Urban Design and Architecture Development Summary, which forms part of this application package, discloses a full site development of 246 apartments and 281 car parking spaces.

The TIA itself references a concurrent Planning Proposal (PP-2023-1648) that achieved Gateway Determination on 7 April 2025, which contemplated up to 246 apartments and 278 car parking spaces across the whole site (Section 1.6). Despite this, the TIA confines its formal traffic assessment to the 65-apartment western building — less than 27% of the development the site will ultimately yield.

Scenario	Apartments	Car Spaces	Spaces per Apartment
Existing site	106	Not disclosed in TIA	—
This application (TIA scope)	65	134	2.06
Full site (developer's Urban Design document)	246	281	1.14

The subdivision approved under this consent is the legal mechanism that enables the full development to proceed. Assessing only the first stage in isolation — and relying on four-year-old traffic modelling commissioned for a different purpose — does not constitute an adequate assessment of the traffic and parking impact this site will ultimately generate on New McLean Street and its surrounds.

4.1 The TIA's Traffic Forecasts Are Undermined by Its Own Parking Provision

The TIA's conclusion of negligible traffic impact rests critically on an assumption that only 20% of residents will travel by private car, with 51% using the train and 20% walking (Section 3.5, Table 6). No supporting evidence is provided for these mode share figures beyond a general reference to existing travel behaviour in Edgecliff. They are, in effect, an assertion.

The TIA's own parking provision directly contradicts this assertion. The development proposes 134 car spaces for 65 apartments — a ratio of 2.06 spaces per apartment — including 2.0 allocated spaces for every 3-bedroom unit (Section 3.4, Table 4). This is a generous, car-oriented parking allocation by any measure.

The number of car parking spaces provided is a far more reliable predictor of actual vehicle use than an unsubstantiated mode share assumption. Households provided with two dedicated parking spaces will, in practice, tend to own two cars and use them. A development that provisions parking at this rate is not a transit-oriented development generating 20% car trips — it is a car-accommodating development whose traffic impact will be materially higher than the TIA suggests.

The internal contradiction is striking: the TIA simultaneously argues that residents will mostly not drive, while providing enough parking for virtually every apartment to have two cars. These positions cannot both be right. The parking provision is the more credible guide to

likely behaviour — and it points to a significantly higher vehicle generation rate than the TIA's traffic impact figures reflect.

The two choke points and parking pressures described in Sections 2 and 3 above will be worsened by every additional stage of development on this site. The consent authority should require that the cumulative impact of the full development be assessed now, while conditions can still be shaped to protect existing residents, rather than after each incremental consent has been granted.

5. Summary of Requested Outcomes

I respectfully request that the consent authority impose the following conditions, and require the following further studies, before or as part of any consent for this application:

Further studies required before consent:

- An independent safety and capacity assessment of the right-turn entry from eastbound New South Head Road into New McLean Street, and the right-turn exit from New McLean Street onto eastbound New South Head Road, modelling the impact of the full 246-apartment development yield.
- An amendment to the TIA quantifying the number of on-street parking spaces lost due to the proposed driveway, and a parking impact assessment for New McLean Street and adjacent permit streets.
- A cumulative traffic and parking impact assessment covering the full development potential of the site and other approved or anticipated developments in the Edgecliff Commercial Centre precinct.

Conditions of consent:

- A restriction on title preventing occupants of the development from being granted resident parking permits for on-street parking on New McLean Street or adjacent permit-zone streets.
- A requirement that any on-street parking spaces lost due to the new driveway be offset by converting an equivalent number of the development's visitor parking spaces to publicly accessible resident permit spaces.
- A requirement that the developer fund any physical intersection improvements identified by the independent safety assessment as necessary to maintain safe operating conditions at the two identified choke points or limit the development's parking capacity to no net increase in vehicles.

Appendix: New McLean Street Traffic Volumes and TIA References

A. New McLean Street Turning Movement Volumes

The following table is derived from Figure 6 of the TIA (Section 2.5), which presents turning movement counts recorded at the New South Head Road / New McLean Street / Darling Point Road intersection on Thursday 11 September 2025. The table isolates the movements entering and exiting New McLean Street specifically.

Movement	AM Peak (7:30–8:30)	PM Peak (5:00–6:00)
Entering from New South Head Rd eastbound (right turn into New McLean St)	100	98
Entering from New South Head Rd westbound (left turn into New McLean St)	207	140
Entering from Darling Point Road (straight into New McLean St)	27	40
TOTAL ENTERING New McLean Street	334	278
Exiting via left turn (onto westbound New South Head Rd)	112	160
Exiting straight ahead	47	86
Exiting via right turn (onto eastbound New South Head Rd)	84	111
TOTAL EXITING New McLean Street	243	357
TOTAL NEW McLEAN STREET MOVEMENTS	577	635