

26 May 2026

C/o Aditi Coomar and Nancy Sample
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Dear Madam,

Application Number SSD-77608714-Mod-2

Modification Increase building height and other external modifications

Location 1 Darling Point Road, Edgecliff (formerly 136-148 New South Head Road)

Thank you for your email dated 12 May 2026, inviting Woollahra Council to provide advice on the abovementioned State Significant Development (SSD) modification application.

It is understood that the SSD-77608714- Mod-2 comprises of amendments to the:

- Façade materiality and design including amendments to the podium, above-ground carpark, and tower.
- Heritage item and public domain.
- Ground floor access and servicing provisions.
- Communal open space and landscaping.
- Roof design.
- Building height resulting in a 100mm increase.
- Internal apartment layouts.

Council staff have reviewed the Modification Report and supporting documents and provide the following comments:

1) Relevant background

The site was subject to planning proposal PP-2022-1646, which introduced clause 6.11, a site-specific local provision to the Woollahra Local Environmental Plan 2014 (WLEP), which permitted an uplift for the site from 4 storeys to 12 storeys.

A pre-requisite of the uplift was the consent authority being satisfied that the development exhibited design excellence.

Clause 6.11 (7) specifies the mandatory matters the DPHI was required to consider, during the assessment of the original SSD, to determine whether the development exhibited design excellence:

- (a) whether a high standard of architectural design, materials and detailing appropriate to the building type and location will be achieved,*
- (b) whether the form and external appearance of the development will improve the quality and amenity of the public domain,*
- (c) the relationship of the development with other existing or proposed development on the same site or on neighbouring sites in terms of separation, setbacks, amenity and urban form,*
- (d) whether the building resulting from the development will incorporate sustainable design principles, including in relation to the following—*
 - (i) sunlight,*
 - (ii) natural ventilation,*
 - (iii) wind,*
 - (iv) reflectivity,*
 - (v) visual and acoustic privacy,*
 - (vi) safety and security,*
 - (vii) resource, energy and water efficiency,*
- (e) whether the proposed development will detrimentally impact the following—*
 - (i) view corridors and landmarks,*
 - (ii) pedestrian, cycle, vehicular and service access,*
 - (iii) circulation requirements, including the permeability of the pedestrian network,*
- (f) the impact of the development on the public domain,*
- (g) whether there are appropriate interfaces at ground level between the buildings and the public domain,*
- (h) whether the development will include a mix of retail, commercial and residential uses.*

SSD-77608714 sought to utilise the uplift permitted under clause 6.11 of the WLEP and the affordable housing bonus under the Housing SEPP to provide a 17-storey mixed use development.

The proposal was referred on two occasions to the State Design Review Panel (SDRP) and incorporated a number of design refinements to respond to the advice from the SDRP and Department Planning Housing and Industry (DPHI), and as part of the Response to Submissions (RtS).

In reaching the conclusion that the final proposal exhibited design excellence, the DPHI advised:

- The proposal presents a high standard of architectural design, materials, and detailing.
- The external appearance of the development will improve the quality and amenity of the existing public domain.
- The proposed design will provide an acceptable pedestrian experience at the ground plane.

The proposed modifications should not dilute the original design quality, as the proposal exhibiting design excellence was a statutory prerequisite for unlocking the uplift for the site.

2) Façade materiality and design including amendments to the podium, above-ground carpark, and tower.

Podium

Pillars:

The modification replaces the architectural feature columns with round pillars as detailed in the images below from the modification report.

The modification report states the amendment rationalises the pillars, but the number and size of the pillars appear to have increased.

The original Architectural Design Report identified that the feature columns were a key façade concept to ensure a high standard of design, by giving important corners of the building visual prominence.

The slender columns were also designed to minimise obstructions to the views of the heritage item. Council's Heritage Officer has advised that:

The modification changes the large tapered concrete columns within the ground floor forecourt to a simpler, round column form. The modification will also increase the number of columns. The tapered columns were a point of distinction for the design of the forecourt, as they responded to the distinct curved form of the interwar functionalist heritage item. The untapered columns now further accentuate the harsh horizontal lines of the podium level above.

The amended design undermines the original design concept for the podium façade.



Approved



Proposed



Approved



Proposed

Shopfronts to New South Head Road:

The approved development framed the shopfronts to New South Head Road with concrete. Under the proposed modifications this would be amended to brick. This is detailed in the images below from the modification report. The modification to the materiality is considered an improvement.

The approved metal awnings above the shop fronts would be replaced with fixed rigid fabric. No objection is raised to this amendment.



Approved New South Head Road shopfronts and metal awning



Proposed New South Head Road shopfronts and fabric awning

Level 4:

The proposed modifications reduce the height of the level 4 parapet and introduce a metal balustrade to New South Head Road, as detailed in the images below from the modification report.



Approved



Proposed



Prior to the lodgement of the SSDA, the proposal included a lower parapet height as detailed in the image below.



The Architectural Design Report submitted with the original SSD stated:

The blades on the topmost carpark level are mirrored to create a visual shift that subtly differentiates the topmost floor of the podium. This adjustment inverts the impression of solidity when viewing the facade from different approaches.

The brick piers of the carpark and commercial facades extend past the topmost slab of the podium to form a parapet and the balustrade to the level four terrace. This results in a taller proportion of the topmost floor of the

podium which further distinguishes this condition from the rest of the podium levels.

The approved higher brick parapet provided a cleaner more substantial podium level with a unified façade, which reinforced a consistent street wall form with the adjoining building to New South Head Road. The proposed amendment undermines this.

Commercial façade:

The approved brick spandrels to the commercial façade are proposed to be replaced with aluminium, as detailed in the images below from the modification report.

The cantilevered commercial façade will form a prominent feature within the streetscape, the replacement of the brick spandrel with aluminium is considered to reduce the original design quality.



Podium South Carpark façade:

The proposal seeks to change the form and frequency of the brick louvered façade treatment. The approved design offers more frequent and finer louvred blades. The modification seeks a thicker, less frequently spaced, concertina form as depicted in the images below from the modification report.



At their initial meeting, the SDRP commented that it was critical that the carpark façade, which will be a prominent element on New South Head Road, is of a high standard of architectural design.

Council's Heritage Officer has advised that:

The sense of bulk of the façade, particularly at the podium level where it makes the strongest impression on the streetscape, will be increased significantly, and particularly from views to the site from Edgecliff Station. The modification will now present as a solid wall, rather than what was effectively a "reeded finish". The modification will no longer have the same degree of undulation, movement and texture that the louvred design had, which would have helped to "soften" the interface with the heritage item on the corner.

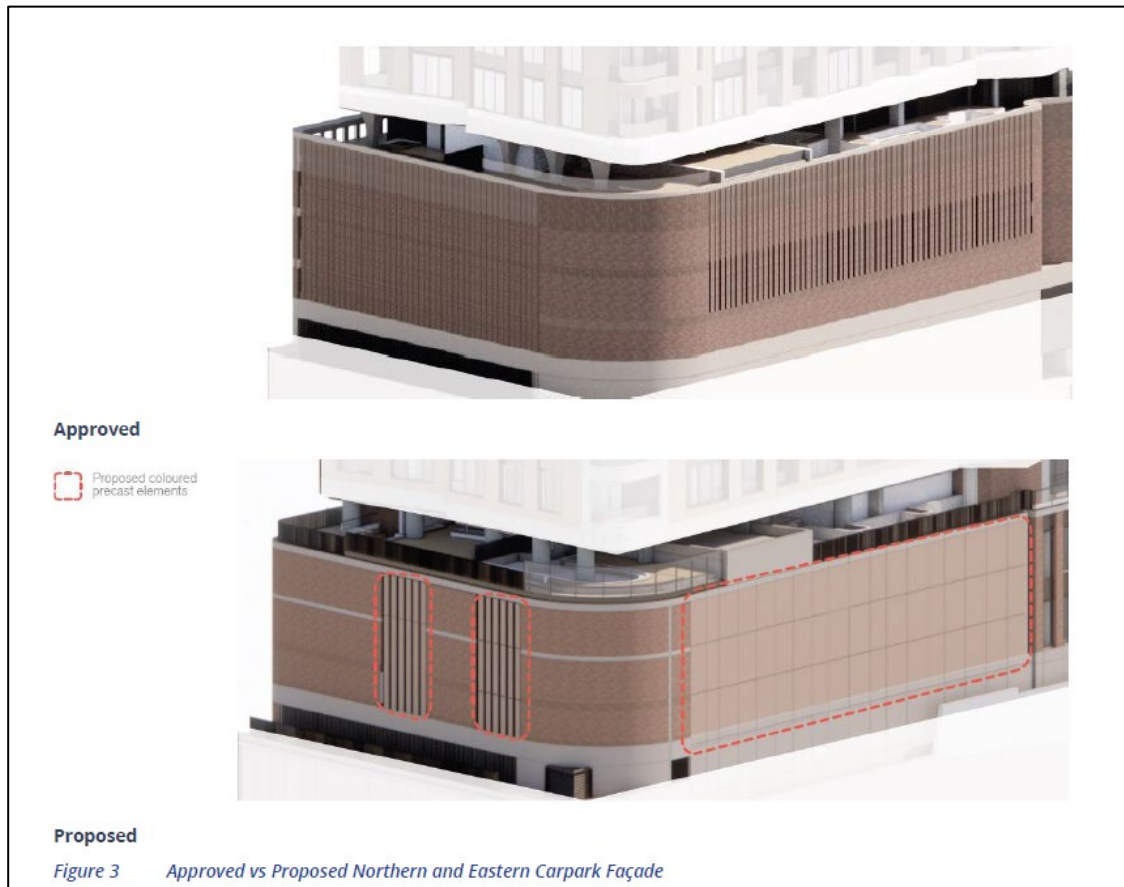
The approved façade to the carpark, with denser brick piers, a finer texture, and a higher brick parapet, is a more cohesive and refined design.

Podium Northern and eastern materiality:

The modification proposes the following amendments to the podium materiality:

- North elevation – The carpark façade is changed from articulated slivered brick to coloured pre-cast concrete panels, and the base is amended from masonry to precast concrete.

- East elevation – The horizontal brick is changed to precast concrete. The frequency of the vertical gaps is decreased, and the base is amended from masonry to precast concrete.

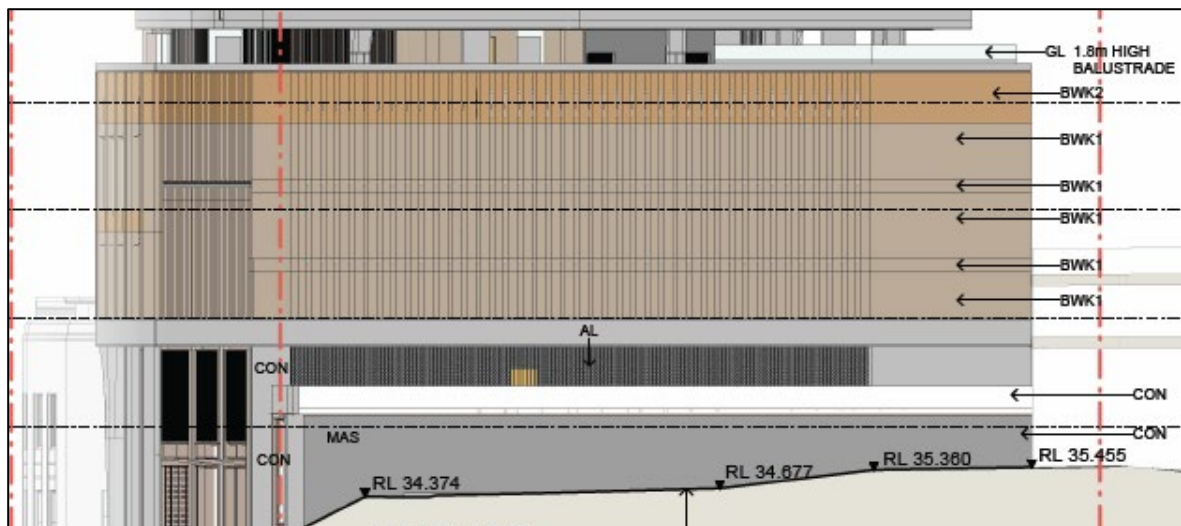


Council's Heritage Officer has advised that:

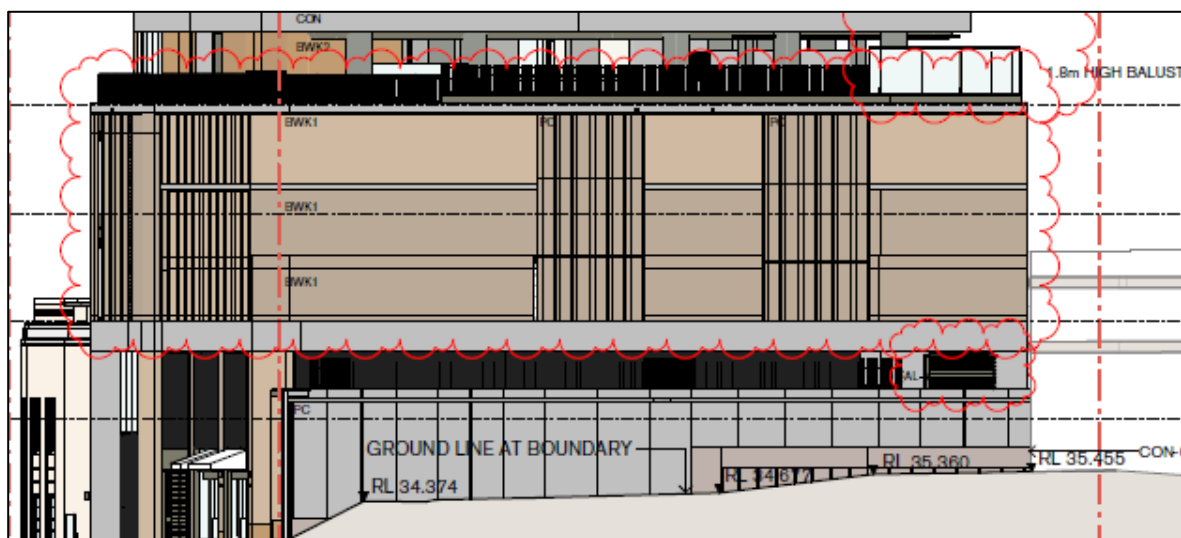
The materiality of the podium level façade treatments has changed to substantially more concrete over brickwork. This is particularly evident on the north elevation, where brick has been replaced for precast concrete, and precast concrete replaced by mass concrete. This further reduces the texture, warmth and definition on the façade and the characteristics that made it more sensitive to the heritage item.

Generally, across the board, changes in material from brick to concrete, or brick to aluminium, is a reduction in the warmth and texture that was originally proposed. The original proposal is more sensitive to the character of the heritage item.

Extracts from the approved eastern elevation and proposed eastern elevation are provided below.



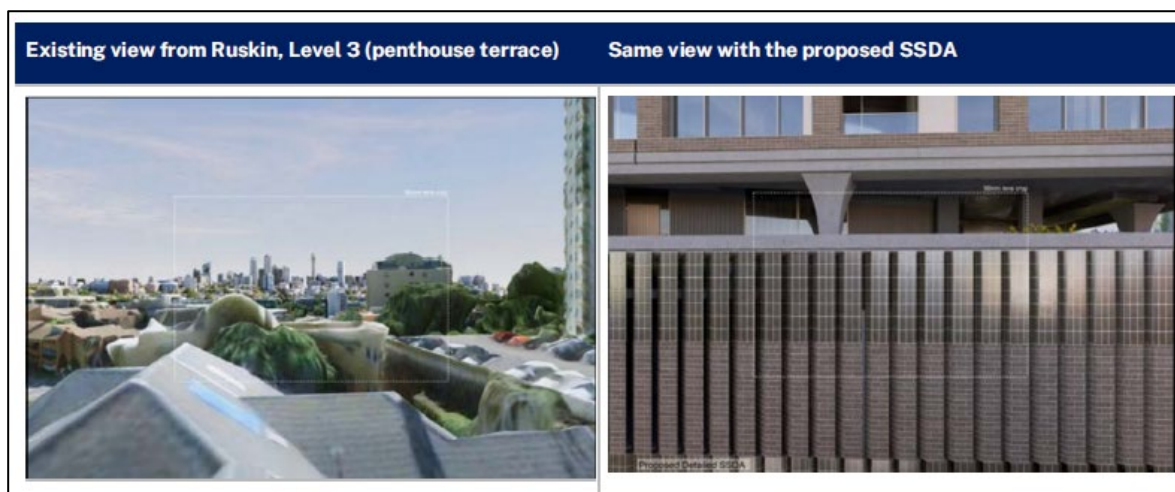
East Elevation Approved



East Elevation proposed

The approved scheme adopted a bladed brick expression to both the eastern and northern frontages of the above ground car park to mitigate the visual impact to the neighbouring properties.

The change in materials and reduction in articulation, results in a poorer outcome when viewed from the neighbouring properties. The approved articulation and design detail is important as the outlook from several properties to the east and north (which include views to the city skyline and district views) will be replaced entirely with views of the podium. Refer to the image below from the Visual Impact Assessment submitted with the original SSD application.



The reduction to the articulation and the quality of the materials should not be supported.

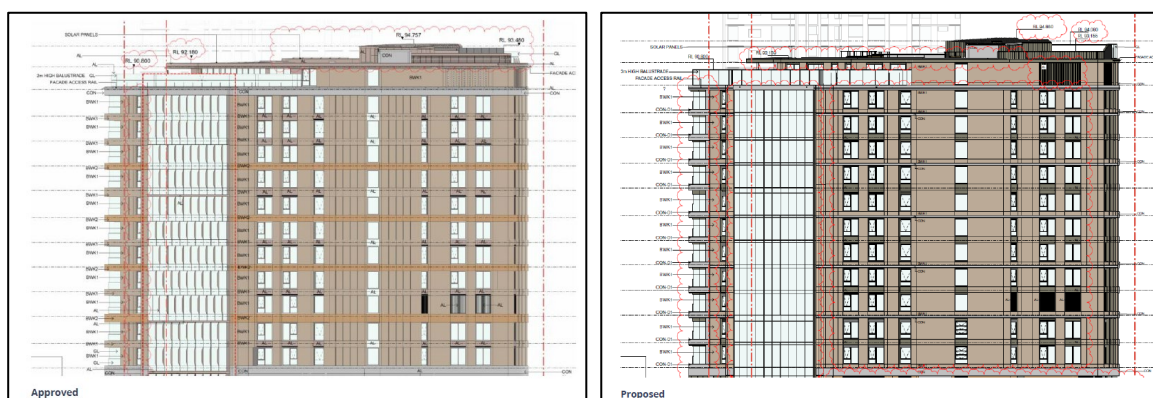
Tower

Concrete slabs

The modification application proposes the concrete slabs to be visible every two levels across the development, except for the northwestern and northeastern corners where the concrete is introduced on all levels in the form of balcony slabs for constructability and fire compliance. This is depicted in the images below from the modification report.



The approved building used vertical banding by utilising differing brick courses and finishes. Extracts from the approved and proposed southern elevation are provided below.



The detailing of northwest balconies will be highly prominent as you travel along New South Head Road. Refer to the image from the modification report below.



The approved brick banding is a superior visual outcome to the exposed concrete slabs.

Southwest picture window

The modification application proposes the deletion of the sunshade devices from the southwest picture window. Refer to the image below from the modification report.



During the assessment of the original SSD, the southwest picture window facade was refined to include additional articulation to break up the scale and further improve its proportion in relation to the heritage building below. The design development can be seen in the image below from the RtS Architectural Design Report.



The RtS Architectural Design Report stated that:

The introduction of horizontal metal recesses and the shuffling of mullions/sunshades aim to break the verticality of the facade and break it up into horizontal sections, which assists in refining the apparent bulk of the tower.

The deletion of the proposed sunshade to the picture window recants the design refinements which were introduced during the design development and undermines the aim to refine the bulk of the tower.

Brick selection

The modification application replaces the approved polished brick with an alternate standard brick.

The RtS Architectural Design Report stated that:

Refinement of fenestration details and combination of brick colour and finishes further provide visual interest. Interaction between unfinished and polished brick bounces the light differently which adds to the visual interest both perceived from distant views or upon closer viewing.

The approved unfinished and polished brick design detail is depicted in the image below from the Response to Submissions Architectural Design Report

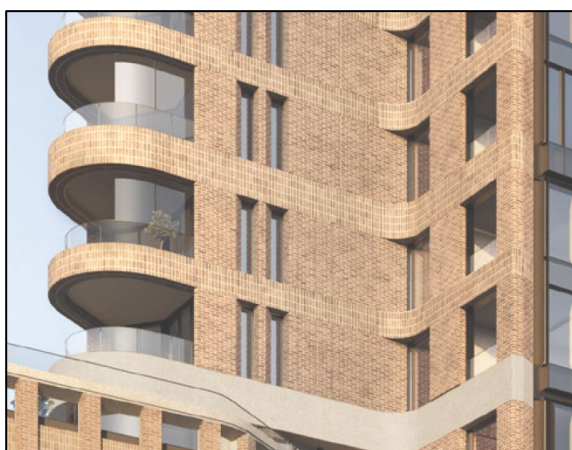
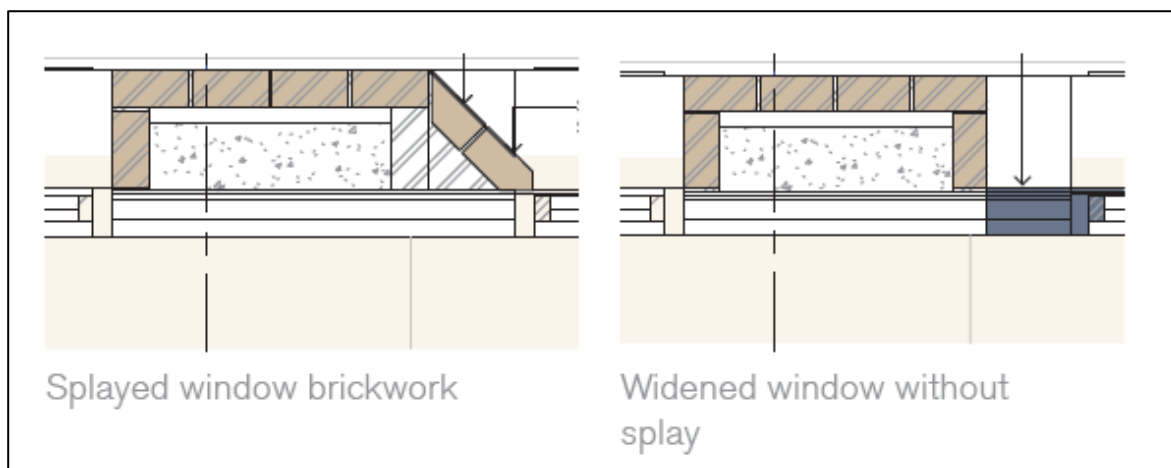


Approved unfinished and polished brick design

The removal of the polished brick removes the visual interest to the facade.

Removal of angle splay to windows and brick piers

The modification application proposes the removal of the angle splay to the windows and the brick pier expression as detailed in the images below from the modification report.



Approved



Proposed

The angle splay to the windows and brick piers add depth, shadow lines, and visual interest to the building.

The applicant has stated that the amendment will improve views and access to natural light and reduce construction complexity. This is insufficient justification for the rationalisation of the design given:

- The approved development was deemed to optimise amenity for future occupiers.
- The amendment reduces the quality of the materials and detailing.
- The development's ability to exhibit design excellence was critical to the SSDs approval.

3) Heritage item and public domain.

Southern pedestrian walkway

The modification includes the removal of the landscape planter to the southern pedestrian walkway and the introduction of a replacement glass screen. This is depicted in the images below from the modification report.



The landscape planter was a requirement of the approved wind study. Council Staff's original submission raised issues with the suitability of the proposed wind mitigation measures to the laneway due to the impact on visibility and circulation. However, the mitigation measures were determined to be satisfactory.

The approved landscape plan denoted 1.5m to 2m high density foliating vegetation for wind mitigation, and Condition B.10 e) requires dense planting in accordance with wind study.

The approved planter, extended for approximately 5m across the southern pedestrian walkway. The proposed glass screen extends approximately 1.5m. The modification application was not accompanied by an updated wind statement confirming the proposed glass screen is adequate in terms of wind mitigation.

Condition A.5 c) of the development consent states that no approval is granted for works on land identified for land acquisition. Both a portion of the landscape planter and the proposed glass screen are located on land identified for land acquisition.

The hatched land acquisition area is incorrectly depicted on the proposed ground floor plan (i.e. the hatching is omitted from the location of the glass screen) but is correctly denoted on all other floor plans.

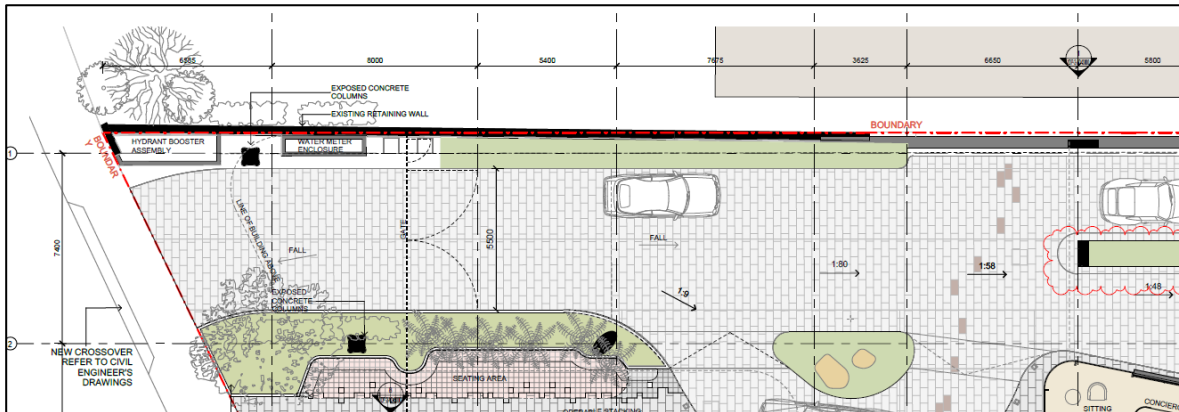
The proposed amendment is not supported for the following reasons:

- The planter box contributed to a more consistent street edge, creating visual continuity of the street wall.
- The introduction of the glass screen, stairs and associated handrail has created a harder and visually cluttered interface with the public domain.
- The approved landscape condition softened the interface with the adjoining heritage item and assisted in mitigating the visual prominence of the under-croft condition to New South Head Road, positively contributing to the landscape quality of New South Head Road, while also enhancing the amenity and character of the proposed outdoor dining on site.
- Approval cannot be granted for works on land identified for land acquisition.

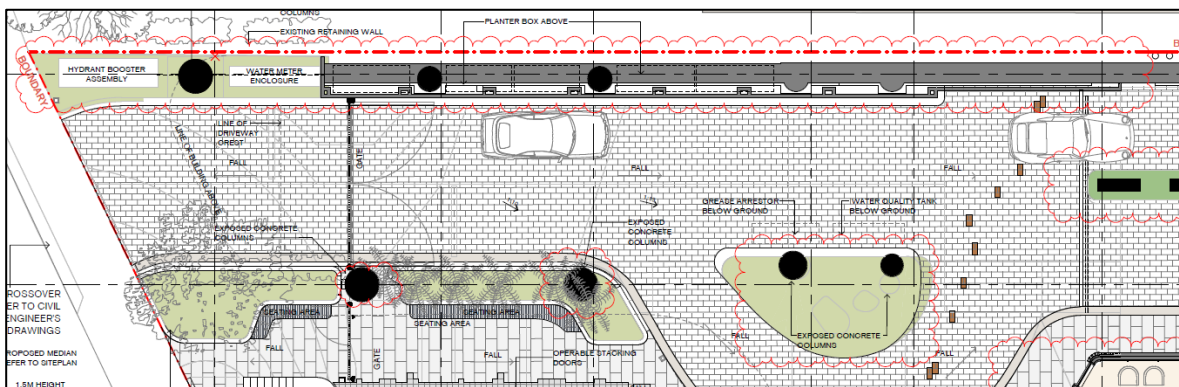
- It has not been demonstrated that the proposal provides adequate wind mitigation to the pedestrian walkway through the site.

Removal of the northern retaining wall

The submitted documentation is unclear in relation to whether the existing retaining wall to the northern boundary is to be retained. The proposed demolition plan details the retention of the wall, but whilst denoted, the retaining wall is no longer clearly depicted on the ground floor plan (refer to approved and proposed ground floor plan extracts below).



Approved ground floor plan



Proposed ground floor plan

The retaining wall to the northern boundary has heritage significance. It should be confirmed that the retaining wall is to be retained.

Heritage building internal layout

The modification application introduces three bathrooms to the heritage item. No objection is raised to the amendment.

4) Communal open space and landscaping.

Landscaping to commercial terrace

The approved integrated planter to the commercial terrace appears to have been deleted and replaced with several pot plants. This is a poor outcome due to the potential for the landscaping to be removed.

The proposed landscaping calculations are unclear. The approved total landscaped area was referenced as 1,438m² in the DPHI assessment report. The Landscape Design Report submitted with the modification states that the deep soil landscaping has been reduced from 96m² to 65m², the planting on level 1 has reduced from 104m² to 100m², and the planting on level 4 has been reduced from 661m² to 634m². The proposed total landscaped area is referenced as 1,709m². It is unclear how the proposed total landscaped area has increased as this does not appear to align with the proposed amendments.

5) Roof design.

The building will be overlooked by several towers in the vicinity, the decision to remove the louvred roof to provide an open-air plant room is not supported.

In relation to the roof top plant, the original ADG assessment stated that:

The building proposes a stepped roof over Level 16 and 17. The roof levels include private rooftop terraces of top-level apartments, solar panels and plant equipment that is covered and screened with suitable materials that complement the overall architectural form and design of the development.

6) Apartment amendments

Concern is raised with the non-compliant ceiling height to the top floor of the sub-penthouse apartment. The submitted ADG compliance table states that the kitchen, dining, and bathroom will have ceiling heights ranging from 2.1m to 2.4m.

7) Conclusion

As set out in this submission, many of the proposed modifications are considered to reduce the design quality of the approved development.

It is requested that these modifications are not supported as the proposal:

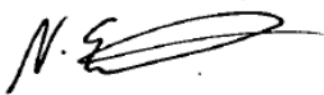
- Replaces high quality finishes with cheaper materials.
- Simplifies the façade and removes articulation to the detriment of the design and amenity of adjoining properties.
- Removes design details, such as feature columns, brick detailing, splayed windows, which contributed positively to the approved design.
- Undermines the strategy identified for the podium level within the original Architectural Design Report.
- Removes or waters down the design refinements, which were introduced during the development of the design.
- Is less sensitive to the character of the heritage item.
- Undermines, the original DPHI assessment, which concluded that the proposed development exhibited design excellence because the Applicant made refinements to the proposal in response to the comments of the SDRP, and presented a high standard of architectural design, materials, and detailing.
- Fails to represent design excellence.

These issues should be considered with heightened importance given that:

- The development exhibiting design excellence was a pre-requisite to unlock the available uplift for the site.
- The site is in a highly prominent corner location on New South Head Road at the junction with Darling Point Road and New Mclean Street.
- The development includes an interface with the existing heritage item on site.

If you require clarification on any issue raised, please do not hesitate to contact Eleanor Smith on (02) 9391 7090 or via email at eleanor.smith@woollahra.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'N. Economou', with a stylized flourish at the end.

Nick Economou
Manager Development Assessment