

Submission on State Significant Development Application:

164–172 & 174–194 William Street, Woolloomooloo NSW 2011

(SSD-80211463)

11/2 Clapton Place, Darlinghurst, Sydney, 2010

Date: 11/11/25

1. Introduction

I am a resident of Darlinghurst and am directly impacted by the proposed State Significant Development at 164–172 & 174–194 William Street. I submit this objection and request that the Department of Planning and Environment defer or refuse consent until a full cumulative impact assessment is undertaken for the entire precinct and assessment of specific concerns related to traffic management, community safety, overcrowding considerations and environmental impacts have been rectified within the current EIS.

When referencing unconsidered cumulative impacts in the EIS, this submission also considers two other large nearby developments currently in the pipeline:

- 134 William Street, Woolloomooloo
- 203–225 Victoria Street, Potts Point

The current EIS makes cursory note of these developments as needing to be considered, however, deliberately avoids the inclusion of collective impacts in an attempt to diminish the overall impact and confuse the reader on collective implications.

My objections include issues with the cumulative impact; however I also object the proposal from a single development perspective, with poor considerations given to traffic management, building management, environmental impact, community safety and visual impacts of the development in this EIS.

As a stand-alone development, and collectively as State Significant Precinct application, this project represents a major change to the built form, traffic, population density, parking demand, and social fabric of the Woolloomooloo–Kings Cross–Darlinghurst precinct and should be halted pending further, more considered and complete, investigation.

2. Strategic Context and Overarching Concerns

The Woolloomooloo–Kings Cross–Darlinghurst corridor is already at or beyond saturation. These neighbourhoods contain some of Sydney's highest residential

densities, combined with intense nightlife, transient accommodation, and legacy infrastructure that was never designed to absorb this level of redevelopment pressure.

Several high-profile proposals in the immediate area have previously been **withdrawn or refused** specifically because of **overcrowding and infrastructure strain**:

- In 2018, the major redevelopment of the old Kings Cross Shopping Centre site was withdrawn following widespread community objection and concern about the precinct's capacity to absorb further density.
- The City of Sydney has on multiple occasions expressed that new large-scale projects in the Kings Cross/Darlinghurst basin must be “self-contained” in terms of parking, loading and open-space provision, because existing infrastructure is already overstressed.
- Previous Woolloomooloo mixed-use proposals have been scaled back after Transport for NSW and local stakeholders raised safety and congestion issues relating to the narrow one-way street network and limited access to arterial roads.

Despite these precedents, the 164 William Street EIS — and its cumulative context with 134 William Street and 203–225 Victoria Street — proceeds as though the precinct has limitless capacity.

This disregards prior lessons and ongoing infrastructure fatigue in the area and shows that the developers have not considered previous attempts to over-develop the area when developing their proposal. Continuing to build high-density housing in one of Sydney highest-density areas shows faulty logic – our suburbs are choked with traffic, people and cars, adding more in an attempt to drive ‘affordable housing’ will only serve to make the area poorer in the long-run.

Beyond the broader suburb context, the framing of these developments as contributors to “affordable housing” is disingenuous when the projects are almost exclusively located on **Sydney's highest-value real estate** — harbour-side sites and streets commanding views of the Opera House, Harbour Bridge and CBD skyline.

Rather than dispersing affordable housing across diverse locations with existing infrastructure capacity, the current approach concentrates it in areas of **maximum developer return**. The State's Housing SEPP bonuses (for height and FSR) are being used to unlock exceptional financial value in premium zones, while the “affordable” dwellings provided are:

- A **small proportion** of the total yield, typically 10–15 percent of floor area.
- **Time-limited** to as little as 15 years before reverting to full-market use.

- Often positioned in **lower-amenity parts** of the buildings — podium levels, southern aspects, or areas without harbour views.
- Disconnected from genuine affordability outcomes, given the surrounding cost of living and limited access to community services.

This pattern reflects a **policy imbalance and runs counter to the core objectives of the policy**: rather than delivering equitable housing opportunities, applied for this (and other planned) development(s), it amplifies land value extraction in already-wealthy locations. It does not broaden affordability across the city; it simply labels a small portion of high-end projects as “affordable” while securing developer and lobbyist returns.

In Woolloomooloo, the result is further densification of a precinct already struggling with congestion, crime and infrastructure pressure — all under the guise of social benefit.

The intent of affordability is commendable, but its execution in this context feels opportunistic and contrary to community wellbeing. This proposal feels disingenuous to local residents when less constrained and less infrastructure-stressed sites elsewhere in the city can deliver the same or greater social benefit.

The clustering of “affordable housing” projects exclusively on prime land such as Woolloomooloo’s harbourside blocks raises legitimate equity concerns. It allows developers to monetise the uplift while delivering only a minimal social outcome. True affordability outcomes would involve public investment in mixed-tenure communities across a broader geographic and socio-economic spectrum — not concentrated within already overburdened city-fringe precincts.

Any further progress towards approval without a higher level of due diligence than has been currently undertaken, set a dangerous precedent for how developers can exploit the ‘affordable housing’ clause.

Additionally, any further progress towards approval without a higher level of community consultation than has been currently undertaken, where community is genuinely educated on impact at a precinct-level and legitimately consulted (rather than simply provided a one-way stream of information, as has been the case in the current Urbis ‘consultation’), sets a dangerous precedent for how easily developers can exploit the ‘affordable housing’ clause.

Failure to acknowledge this is a clear and active decision from Government to allow intentional exploitation by developers for their personal financial gain.

3. Combined Scale of the Three Developments

Address	Estimated Dwellings	Estimated Residents (2 pp/unit)	Estimated Resident Cars (1 per unit)
164 William Street	229	458	229
134 William Street	39	78	39
203–225 Victoria Street	275	550	275
Total	543 dwellings	≈ 1,086 residents	≈ 543 cars

This represents an approximate **increase of over 1,000 residents and more than 540 additional vehicles** within a few connected streets. The EIS for 164 William Street fails to acknowledge or model these cumulative effects and the consultation with community failed to address these issues despite them being noted in the current EIS.

4. Privately owned, publicly accessible park

While not stated by the developer, the development application has used the space that the 'park' now takes up and added that space to the rest of the floor space for the building by adding more height. In relation to this park, it is noted that:

- The park is 1,356sqm. The gross allowable floor area (GFA) for the site is 33,036sqm. The gross floor area for the buildings is 33,036sqm. It is not clear where there is any reduction of GFA as a result of the park inclusion. It is noted the additional 8 stories of height could be addressed within the park space.
- There is no forward planning, nor has there been any legitimate public engagement and consultation, on what happens when local rough sleepers start using the park at night.
- The developer acknowledges the crime issues in the Woolloomooloo and Forbes Street area but severely underestimates them. With a significantly higher rate of homelessness, higher than average assault and liquor offences, generally increasing crime trends over the last 24 months, the area is classified as a "hotspot for assault, malicious damage to property, stealing from dwelling, person crimes and motor vehicle and motor vehicle theft (ref: Appendix NN_Social Impact Assessment, page 31 and 33). The developer does not explicitly address this and there is insufficient forward planning and legitimate public engagement and consultation on how this will be managed over the long-term.

- There is no articulation of whether the developer is able to, at some point in the future, make a decision to close the park off to the public. Given the public open space is, in the developer's view, a 'community benefit', there should be a clearly defined process for proactively managing the space to ensure public access is provided in perpetuity. Without this, the components of the SIA should be disregarded as unable to be realistically delivered.

5. Community consultation

As someone who dialled into the zoom session, I firmly reject the premise this was legitimate community consultation under IAP2 Quality Assurance standards. It was conducted as information sharing rather than legitimate engagement where the ability for that engagement to influence an outcome is considered – that is, the community consultation was a tick-box exercise to achieve a developer desired outcome that is currently being facilitated by Government:

- The community sessions failed to disclose the potential for cumulative impact of precinct-level development.
- The community sessions were information, at best. Many participants were unable to ask questions in real-time because of unresolved technical difficulties on behalf of the host, meaning that these questions and concerns were not able to be 'heard' by other participants in the session. Additionally, several questions asked in the sessions were not able to be answered by the host. The combination of this resulted in a vacuum of credible, complete information for community consideration. Thus, whether this process even satisfies the requirement to 'inform' community should be seriously questioned.
- The combined outcome of these community sessions was not circulated to participants nor published. Thus, whether this process has enhanced public participation in the decision making process and assisted decision makers in being responsive to the community's concerns and suggestions, should be seriously questioned.
- The **community survey** yielded only 51 completed responses out of 4,329 properties. This is a response rate of 0.01%. A response rate at such an abysmal level indicates an entirely disingenuous attempt to understand community perspectives as part of the SIA and should be either excluded or mandatorily re-conducted. I question:
 - how many reminders were sent to encourage a higher response rate;
 - whether there were multiple options for participation (online, offline)
 - how long the survey remained open for;

- the structure of the invitational letter and its framing to ensure there were no biases which – either intentionally or unintentionally - stimulated a low locus of control for community;
- whether the survey attempted to contact property owners, rather than just providing the option to participate those renting a property. This is critical in context that 46.1% of households in Woolloomooloo are rental, 59.0% in Darlinghurst and 54.9% in the Macleay Street/Woolloomooloo Village Area (2021 Census). If those who own properties were not contacted directly to participate, they were excluded from the survey and it should not be considered a rigorous nor representative exercise of consultation.
- The **Council interview consultation** recommended community services and amenities in the area were consulted due to the number of social housing residents in the area and the need to understand their community offerings and programs. As a stated objective of the SIA is to be inclusive of vulnerable audiences, it is not clear whether this recommendation was adhered.
- **Consultation with Southeastern Sydney Local Health District** (Section 4.4) clearly identified the significant population of vulnerable groups in the area including First Nations peoples and those experiencing homelessness. It was described as a complex socio-economic area. To address this, engagement with local organisations (Wayside Chapel, Hope Street and St Vincent's) was advised. It is not stated whether this was conducted and, therefore, whether protections for the most vulnerable people in the community have been accounted for.

6. Detailed Critique of the EIS and Related Development Applications

6.1 Cumulative Impacts

- The EIS assesses traffic, noise and construction effects in isolation, ignoring concurrent projects at 134 William Street and 203–225 Victoria Street.
- No consolidated precinct-level model is provided to quantify total traffic generation, parking demand, or combined construction staging.
- With 543 additional vehicles expected, this omission materially undermines the validity of the traffic conclusions.

Request: Require a **Precinct-Wide Cumulative Impact Assessment** covering traffic, parking, servicing, and construction sequencing for all three projects before determination.

6.2 Traffic, Parking and Access

- The traffic study does not include the combined peak-hour generation from over 500 dwellings.
- No realistic assessment of spill-over parking to adjacent streets is presented.
- Access via **Forbes Street**, a local street, will not withstand the forecast vehicle volume once all developments are operational.
- Appendix T (page 25) suggests traffic will need to go through the back streets of Woolloomooloo. Large parts of Woolloomooloo are designated as heritage conservation and this consideration has been entirely omitted.
- Construction truck movements, loading zones and delivery bays are left to future management plans.

Request:

- Independent modelling (SIDRA or equivalent) of the full precinct network.
- Implementation of resident permit protections, shared-parking management, and on-site car-share spaces.

6.3 Crime Prevention Through Environmental Design (CPTED)

- The CPTED analysis acknowledges that the area has high crime and anti-social behaviour but relies largely on future management plans for mitigation.
- Key design measures (lighting levels, sightlines, active frontages, secure mail/parcel rooms, after-hours gating of laneways) are not embedded as enforceable conditions.
- Increased pedestrian and vehicle activity from three developments magnifies CPTED risks if not treated cohesively.
- The developer claims this development can deter crime and offences however there is no evidence to support this claim and should therefore not be accepted.

Request:

Adopt a **Precinct CPTED Strategy** mandating minimum design standards and public surveillance principles prior to construction certificate stage. Provide specific evidence to community against the claim of the developer deterring crime and offences.

6.4 Affordable Housing Integration

- The 164 William Street EIS proposes 60 affordable dwellings (~26 percent) for 15 years. This is the minimum permissible under the Housing SEPP and does not ensure long-term affordability.
- The EIS lacks detail on distribution, quality, or access parity. Affordable units appear to be located in less desirable areas of the building.

Request:

- Extend affordability tenure to 20 years minimum.
- Require pepper-potted distribution of affordable dwellings with equal access to communal amenities, parking, and finishes.
- Publish a full schedule of affordable units by level, orientation and aspect. Clarification of who will cover strata costs for affordable units, what the weekly rents are for a single person living in a one-bedroom apartment.

6.5 Construction Impacts

- Three simultaneous major builds will cause cumulative noise, dust, vibration and truck movements through narrow heritage streets.
- The EIS defers coordination to future construction management plans without binding commitments.

Request:

A **Precinct Construction Coordination Plan** with the following minimum standards:

- Truck caps per hour across all developments.
- Shared lay-over and delivery zones.
- No-go periods (night and weekend protections).
- 24-hour community hotline with KPIs and penalties for breaches.
- Real-time noise, dust and vibration monitoring with public dashboards.

6.6 Roads Act and Agency Referrals

- The EIS states no Roads Act s138 approval is required, despite proposing access changes and new kerb configurations.

- This position conflicts with statutory requirements for any development that modifies public road infrastructure.

Request:

No consent should be issued until all required Roads Act and Transport for NSW approvals are obtained and made public.

6.7 Contamination and Environmental Management

- Site investigations reveal hydrocarbons, PAHs and lead contamination from former uses.
- Excavation of deep basements poses health and air-quality risks for surrounding residents.

Request:

Appoint an **independent EPA-accredited Site Auditor**, require remediation action plan validation prior to excavation, and mandate continuous air/noise monitoring.

6.8 Incomplete visual impact assessment

- Our property has direct views to the Sydney Harbour Bridge and Opera House.
- No visual impact assessment was undertaken in Clapton Place.
- This failure is material and needs to be rectified.
- A copy of the view from my balcony is included in this submission as an attachment - no visual impact assessment was conducted; the building was not identified by the expert consultants as having an impact and the impact for me and the other owners has been omitted from this EIS. Given the impact on my property is at the extreme end, I question how thorough the visual impact assessment is and how many owners in the local area are unaware that they will lose their view, the associated amenity and property value as a result of a proposal aimed at ensuring developers can capitalise on high-value infrastructure under the guise of affordable housing implementation.

Request:

Reassess visual impact beyond residences already included, and include Clapton Place and surrounds to account for actual impact, not selected impact from the developers.

7. Summarised recommendations

I respectfully request the Department to:

1. **Defer determination** of SSD-80211463 until a full precinct-wide cumulative assessment is completed.
2. Require binding **Precinct Construction Coordination and Traffic Management Plans** covering all three developments.
3. Impose strong **CPTED design conditions** verified pre-Occupation Certificate.
4. Extend the **affordable housing tenure and integration standards** beyond the minimum SEPP requirements.
5. Require **full disclosure of car-parking numbers** (resident, visitor and service) across all developments and enforce spill-over mitigation measures.
6. Ensure **independent environmental auditing** and **public reporting** during excavation and construction.
7. Reassess visual impact beyond residences already included and include Clapton Place and surrounds to account for actual impact, not selected impact from the developers.
8. Conduct **legitimate community consultation and engagement** to understand the true impact of development at this individual development's level, and a precinct level.

8. Conclusion

This development on its own, with the cumulative effect of the three major developments — 164 William Street, 134 William Street, and 203–225 Victoria Street — represents a transformation of this small, congested precinct. The combined impact of more than 1,000 new residents and 500 vehicles, on top of current overcrowding in Kings Cross, Darlinghurst and Woolloomooloo, has not been properly considered.

Until a genuine precinct-wide approach is adopted — one that addresses infrastructure, safety, social balance and genuine housing affordability — approval of any individual development is premature and runs counter to planning requirements and defined and agreed community engagement processes.

I appreciate the opportunity to provide this submission and request that it be recorded as a formal objection.

Yours sincerely,

Impacted local resident, 12/11/25