

To: Ms Michelle Niles, Department of Planning, Housing, and Infrastructure

**Re: SSD-80211463 for 164-172, 174-194 William Street
WOOLLOOMOOLOO NSW 2011**

**Mixed use development with in-fill affordable housing, 164
- 194 William Street, Woolloomooloo**

12 November 2025

Dear Ms Niles,

I write to object to the abovementioned proposed development and advise as follows:

INTRODUCTION

I am the owner of Unit 32 (Lot 32) in Strata Plan 20087 (5-15 Farrell Avenue/26 Kirketon Road, Darlinghurst). being near the site of the proposed development.

As a resident and homeowner of Unit 32 for over 25 years I have and continue to derive and gain:

- immense and incalculable enjoyment;
- pleasure;
- amenity;
- family identity, historical and spiritual connection; and,
- wholeness and wellbeing;

from unique and iconic panoramic views and outlooks of Sydney, Sydney Harbour, and surrounding areas from my apartment, connecting me with the lands:

- and world-famous waters of Sydney Harbour;
- around Woolloomooloo Bay; and,
- around Potts Point, Kings Cross, and Darlinghurst.

I have spent more than thirty years of my life in the locality of my ancestors, including:

- the highly famed Australian poet, journalist, and Second World War correspondent, Kenneth Slessor OBE (1901 – 1971) whose finest poem “Five Bells”, relates to Sydney Harbour; and,
- the renowned Captain William Summerbell, Manager of the North Shore Ferry Company and colliers from Sydney Harbour to Newcastle (1834 – 1896);

celebrating and honouring my close cultural, historical, and family identity, heritage, and significant spiritual connectedness with the lands of Darlinghurst, Kings Cross, Potts Point, Elizabeth Bay, and the world-famous waters of Sydney Harbour and Woolloomooloo Bay.

I submit:

1. I highly value and significantly treasure the unique views and aspect of iconic:
 - Sydney Harbour Bridge;
 - The Sydney Opera House;
 - The Royal Botanic Gardens; and,
 - Mrs Macquarie’s Point.
2. I gain immense and incalculable value, wholeness, and wellbeing from the renowned panoramic views and outlooks of:
 - the Art Gallery of NSW;
 - the Domain;
 - Woolloomooloo Bay;
 - the Finger Wharf; and,
 - Pinch Gut Island or Fort Denison.
3. My celebration and honouring of my close cultural, family, and historical identity, heritage, and significant spiritual connectedness with these lands, wholeness, and

wellbeing is significantly and substantially enlivened and enriched in these iconic, unique, renowned, panoramic views and outlooks.

4. I have:

- been an owner and member of the Owners Corporation for Strata Plan 20087 for over 27 years;
- been closely associated with these apartment buildings since the mid-1990s; and,
- enjoyed their panoramic views for at least 30 years;

knowing full well the significant amenity value these iconic views ensure for these apartment buildings and their residents.

5. I specifically purchased Unit 32 to:

- enjoy and share its prized position in a dress circle location; and,
- its panoramic views, aspect and resulting amenity.

6. Many other owners in these apartment buildings:

- have very long ownership associations with these buildings like myself; and,
- purchased and continuously reside in their apartments for the very same reasons.

7. I enjoy amazing views and aspects from:

- both Balconies,
- the Living Room;
- Dining Area;
- Kitchen;
- both Bedrooms;

so, there are panoramic views from almost every apartment room.

8. The apartment buildings (in Strata Plan 20087) were clearly designed to:

- maximise internal and external access to; and,
- focus on the sweeping views, panoramic aspects, and iconic outlooks of;

the distinctive and renowned landmarks of Sydney and world-famous Sydney Harbour.

9. This is demonstrably evident in the apartment:

- floorplan design;
- their optimised orientation to the panoramic views;
- the larger than usual sized balconies;
- the generous glazed sliding doors and windows; and,
- the glazed balustraded balconies.

OBJECTION TO PROPOSED DEVELOPMENT SSDA

The gross and drastic scope, scale, and height of the abovementioned proposed development is:

- demonstrably and deleteriously visible; and,
- significantly, substantially, and severely excessive,

viewed from the apartment buildings in Strata Plan 20087.

A documentation review necessitates registering my objection to the proposed development for the reasons and major concerns included in and not limited to the following:

Building Mass and Clause 4.6 Variation Objections

A. The proposed development is:

- exceedingly over scaled; and,
- fails to meet requirements:
 - to appropriately sympathise with the Heritage Conservation Areas;
 - for low scale buildings of the locality;
 - for buildings in the locality that have significant amenity;
 - for substantial enjoyment of the iconic views of Sydney and its panoramic harbour; and,
 - for the visual impact from Sydney Harbour.

B. The proposed development does not respect, acknowledge, adequately and appropriately consider and sympathise with the:

- Heritage Conservation Areas;
- low scale buildings of the locality;
- buildings in the locality with enjoyment of the iconic views of Sydney and its panoramic harbour; and,
- visual impact from Sydney Harbour.

C. The proposed oversized development is completely incongruent with the:

- unique, special historical, and fine-grained architectural character and heritage of the locality; and,
- its lower scales;

adversely impacting and significantly disadvantaging its existing context and amenity.

D. The gross and drastic scope, scale, and height of the proposed State Significant Development Application (SSDA) fails to align with the environmental planning requirements as evidenced in the City of Sydney's (the city) objection to the SSDA in its submission letter of 11 November 2025, confirming on page 1 it is a *"significant departure from the Concept DA approved by the city"*.

The city confirms on page 1 its objections to the variation to environmental planning requirements for:

- height of building; and,
- floor space ratio development standards;

which I understand require proposed developments to respect, acknowledge, adequately, and appropriately consider and sympathise with:

- amenity;
- heritage;
- low scale buildings of the locality; and,
- the buildings in the locality;

that have significant amenity, and substantial enjoyment of the iconic views of Sydney and its panoramic harbour.

Referring to Clause 4.6 variations the city expresses its objection to the lack of reasonableness and balance in the proposed development, observing on page 2:

"that because of proposed variations directly cause view sharing and outlook impacts to neighbouring properties and adversely affect the wind comfort around the site and in the proposed publicly accessible park."

Affordable Housing Objections

E. I am not objecting in any way to the provision of affordable housing per se.

However, as the city states on page 2, there are substantial objections to the affordable housing components of the proposed development.

Furthermore, it is never justifiable, defensible, acceptable, or appropriate for an affordable housing proposed development to be:

- gross and drastic in scope, scale, and height;
- demonstrably and deleteriously visible; and,
- significantly, substantially and severely excessive;

that greatly diminishes the renowned, iconic, and highly valued amenity, heritage, enjoyment, and quality of life of many, many, many, long-standing existing residents.

Objections from Visual Impact Assessments

F. The Visual Impact Assessment (VIA) conducted by the city in the approval process of DA D/ 2022/139 established a fair and reasonable scaling of the proposed development.

The VIA conducted by Urbaine undeniably, irrefutably, and indisputably demonstrates the exceedingly deleterious and detrimental impacts on the apartment building of Strata Plan 20087, resulting in significant and substantial loss of:

- amenity;
- immense and incalculable enjoyment and pleasure;
- family identity, historical and spiritual connection; and,
- wholeness and wellbeing;

from these panoramic views and outlooks.

It is vital the Department of Planning, Housing, and Infrastructure adequately respect and appropriately considers the abovementioned exceedingly deleterious and detrimental impacts on the apartment buildings of Strata Plan 20087.

To fail to do so would be patently unconscionable, grossly inequitable, entirely unreasonable, demonstrably inappropriate, and completely unacceptable.

Wind Tunnelling Objections

G.I referred in D. above to the city's objection to adverse effects from "*wind comfort around the site and in the proposed publicly accessible park.*"

The city further objects to the wind comfort on pages 7 and 8 of its submission letter of 11 November 2025, observing an "updated wind assessment must be provided".

The oversized, scope, scale, and stacking of height of the proposed development exacerbates the existing detrimental wind tunnelling along William Street, significantly reducing the:

- area's character;
- amenity; and,
- quality of the locality;

for residents, business owners, and pedestrians.

Wind tunnelling in William Street is already a most serious problem, and the proposed development will adversely impact and disadvantageously affect the:

- locality and its area;
- character;
- environment; and,
- enjoyment;

by residents, business owners, and pedestrians alike, making it less likely there will be foot traffic in the locality, which is vital for the:

- business success; and,
- quality, enjoyment, and amenity of the locality.

Solar Access Objections

H. The city's objections to the proposed development on page 3 of its submission letter of 11 November 2025, include Solar Access.

The proposed development will result in serious further deterioration in the loss of sunshine and sunlight to the locality, due to the:

- oversized, scope, scale, and stacking of height of the proposed development; and,
- the stacked height of the proposed development in the context of low scale buildings of the locality.

This will inevitably result in a cold, windswept, sunlight denied, arid deserted, thoroughfare of William Street and surrounding roads, seriously deprecating and disadvantaging an area of:

- character;
- heritage; and,
- residential quality, amenity, and enjoyment.

Climate Change / Greening / Urban Canopy Objections

- I. The city objects to the proposed development from page 4 of its submission letter of 11 December 2025, failing to provide acceptable and appropriate urban canopy / trees and deep soil planting.

This is inconsistent with environmental planning requirements and imperatives for the greening of the city to adequately, appropriately, and satisfactorily respond to climate change and global warming.

Parking and Traffic Objections

- J. The city objects on pages 8 and 9 of its submission letter of 11 November 2025, to the proposed development with respect to adverse impacts on parking and traffic.

The oversized, scope, scale, and stacking of height of the proposed development will considerably exacerbate and further worsen the vehicular traffic congestion, choking, and chaos of William Street and surrounding roads.

Existing roads in the locality were not designed for the current volume, usage, and demands of road and vehicular traffic and users.

Existing road and vehicular traffic is already excessive, especially in William Street, with severe congestion and choking of William Street and entry and exit points already in increasingly long peak periods.

This inevitably will result in the active and deliberate avoidance of the locality as a destination, and William

Street and surrounding roads, as a thoroughfare by residents and businesses.

Air Pollution Objections

Furthermore, the air pollution arising from substantially increased road and vehicular traffic usage will become an even greater serious concern for:

- residents;
- businesses; and,
- pedestrians;

in the locality, resulting in serious and unwanted adverse environment, area character, and residential quality resulting in the active and deliberate avoidance of the locality as a destination, and William Street and surrounding roads, as a thoroughfare.

Noise Pollution Objections

Moreover, the noise pollution from substantially increased road and vehicular traffic will inevitably become a seriously greater concern for the enjoyment of the locality by

- residents;
- businesses; and,
- pedestrians;
- character,;
- environment;
- amenity; and,
- residential and business quality;

resulting in the active and deliberate avoidance of the locality as a destination, and William Street and surrounding roads, as a thoroughfare.

This will undoubtedly disadvantage businesses and residential buildings in the locality, making it less likely there will be foot traffic in the locality, which is vital for the:

- area character;
- heritage;
- business;
- enjoyment;
- residential quality; and,
- amenity;

of the locality.

Parking, Traffic, Air Pollution, Noise Pollution Objections Conclusion

It is undeniable, irrefutable, and indisputable the oversized, scope, scale, and stacked height of the proposed development will significantly exacerbate and substantially worsen the:

- vehicular traffic congestion, choking, chaos,;
- noise pollution; and,
- air pollution;

of William Street and surrounding roads of the locality, resulting in:

- residents,;
- businesses; and,
- pedestrians;

being no longer attracted to the locality, but actively and deliberately seeking to avoid the locality as a destination and a thoroughfare.

The significant and substantial adverse impacts on road and vehicular traffic in the locality need to be seriously investigated, reviewed, and considered.

It is essential an appropriately detailed traffic study be conducted and considered in consultation with residents and business owners relating to actual everyday experiences.

Conclusion

K. I well recall the development application for the Avis building at 200 William Street, Woolloomooloo, many years ago, and the reduction required to the excessive scope, scale, and height of the proposed AVIS building, for the very same:

- sound reasons;
- considerations, and imperatives;
- environmental planning standards and requirements,;

to avoid significant and substantial view, aspect, and amenity loss for many, many residents in the:

- Heritage Conservation Areas;
- low scale buildings of the locality;

with enjoyment of the iconic views of Sydney and its panoramic harbour.

View Studies

I understand view studies are to be included in the submissions for Strata Plan 20087, and should be referred to and considered in relation to these submissions.

I have also attached 4 photos of views from my apartment being Lot 32 in Strata Plan 20087, for your attention and consideration.

Yours sincerely,

A handwritten signature in black ink, consisting of a stylized initial 'P' followed by a long horizontal line that ends in a small upward tick.

Name: Philip Summerbell

Apartment: 32 / 5-15 Farrell Avenue, Darlinghurst - (Lot 32
Strata Plan 20087)

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