

# Response to Submissions and Amendment Report

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*164-172 and 174-194 William  
Street, Woolloomooloo (SSD-  
80211463)*

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Report Number	Response to Submissions and Amendment Report Final – 22 May 2026

## *Acknowledgment of Country*

Urbis acknowledges the Traditional Custodians of the lands we operate on. We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years. We pay our respects to First Nations Elders, past and present.

Urbis is committed to incorporating our respect for First Nations cultures, peoples and storytelling in our work across the Country. We are proud to have partnered with Darug Nation artist, **Hayley Pigram**, and to profile her artwork – **Sacred River Dreaming**.



*The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.*

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Response to Submissions Report – 164–172 and 174–194 William Street, Woolloomooloo

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# Executive Summary

This Response to Submissions (**RtS**) and Amendment Report has been prepared by Urbis on behalf of William Street Residential Pty Ltd (**the Applicant**) to address the matters raised during the public exhibition of the State Significant Development Application (**SSDA**) for the proposed mixed-use development at 164–172 and 174–194 William Street, Woolloomooloo (SSD-80211463).

The SSDA was publicly exhibited by the NSW Department of Planning, Housing and Infrastructure (**DPHI**) between 30 October 2025 and 13 November 2025 for a period of 15 days.

This combined RTS and Amendment Report responds to all concerns raised within the submissions and assesses the amendments proposed in response to the submissions and detailed design development.

## Overview of Submissions

During the public exhibition period, the following responses were received:

- 1 submission from Council
- 1 submission from an interest group
- 155 submissions from members of the local community and individuals

Three submissions were received outside of the public exhibition period and have been considered as ‘feedback’ in this report. Five advice letters were also received from government agencies which have been considered in this RTS/Amendment Report.

Submissions raised a range of issues which can be broadly grouped into the following categories:

- Affordable housing and social outcomes
- Built form, height and massing
- Visual and streetscape impacts
- Residential amenity, including overshadowing and wind
- Traffic, transport and servicing
- Public domain, landscaping and open space
- Statutory and procedural matters
- Other matters, including issues beyond the scope of the SSDA

A Key Issues Letter was issued by DPHI on 19 December 2025, consolidating matters raised in submissions and issues identified through the Department’s assessment. These issues are addressed in this RtS Report.

## Actions Taken Since Exhibition

Since the public exhibition of the SSDA, the Applicant has undertaken further engagement with DPHI, City of Sydney Council (**CoS**), Transport for NSW (**TfNSW**), Cancer Council NSW and the Government Architect NSW through the Design Integrity Panel (**DIP**).

Amendments to originally issued documentation, as well as additional assessments and design documentation have been prepared to respond to the issues within these submissions, as well as those from other parties. Details on the refinements to the project are explored in detail in **Section 3.2**, while the amended and additional documentation submitted with this RtS Report is listed in **Table 1** below.

## Updated Justification and Evaluation

The Environmental Impact Statement (**EIS**) lodged with the SSDA assessed the proposal against relevant statutory and strategic planning frameworks and addressed the Secretary's Environmental Assessment Requirements (**SEARs**). This RtS report builds on that assessment by responding to matters raised during exhibition and providing updated analysis where required.

Subject to the proposed refinements and amendments and the implementation of recommended mitigation measures, the proposal is not expected to result in any unacceptable environmental, social or amenity impacts. The development continues to demonstrate strategic and statutory merit and supports the orderly redevelopment of the site to deliver diverse housing, including a significant proportion of affordable housing, in a highly accessible inner-city location.

Through targeted design amendments, the proposal seeks to manage potential view and overshadowing impacts to an acceptable level, while also enabling improvements to the public domain, landscaping and through-site connectivity.

Having considered all relevant matters, the proposed development is considered appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

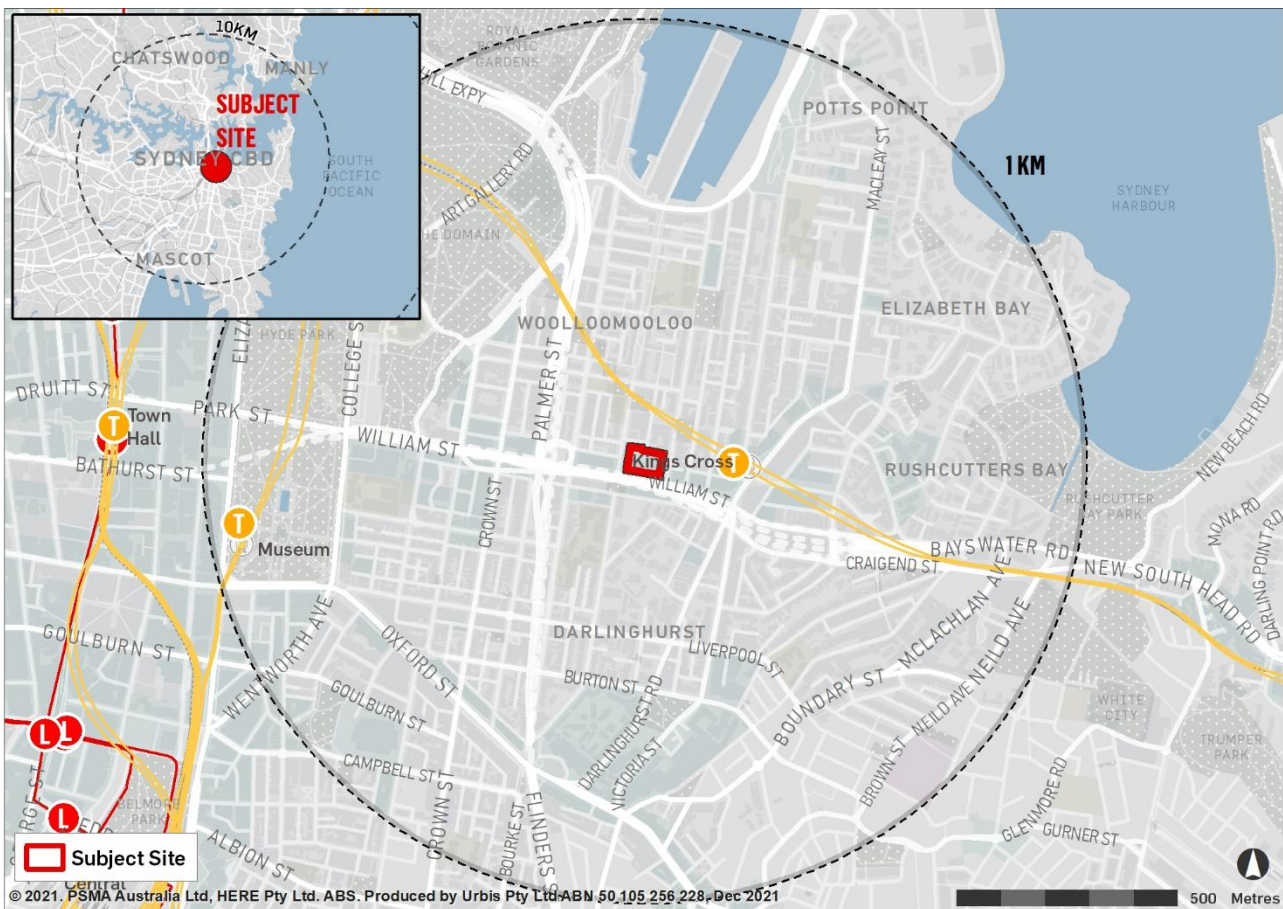
# 1 Introduction

This (RTS) and Amendment Report relates to the proposed mixed-use development at 164–172 and 174–194 William Street, Woolloomooloo (the site). On behalf of William Street Residential Pty Ltd (the Applicant), this Report has been prepared to address the matters raised by public agencies, local Council, the community and other relevant stakeholders throughout the public exhibition period.

The State Significant Development Application (SSDA) was lodged with the Department of Planning, Housing and Infrastructure (DPHI) in October 2025 as SSD-80211463. The SSDA was placed on public exhibition for 15 days between 30 October 2025 and 13 November 2025.

This report has been prepared in accordance with the DPHI *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) March 2026* and *State Significant Development Guidelines – Preparing an Amendment Report (Appendix D) March 2026*.

Figure 1 Regional Context



Source: Urbis

## 1.1 Exhibited Project

The SSDA (as lodged) sought consent for:

- Demolition of existing structures and excavation for 4 basement levels.
- Construction of a mixed-use precinct, comprising 4 buildings ranging in height from 6 storeys to 18 storeys, including:
  - 33,036sqm of gross floor area (GFA), equating to an FSR of 5.16:1.
  - 227 apartments, comprising the following mix:
    - 167 market apartments.

- 60 affordable housing apartments to be managed by a CHP for 15 years.
- Ground floor retail uses and within the first floor along William Street
- Four levels of basement for 293 residential parking spaces, 39 retail and visitor parking spaces, and 24 motorcycle spaces.
- Vehicular and loading access from Forbes Street.
- A 1,356 sqm publicly accessible park.
- A new laneway, connecting Judge Lane to Dowling Street.
- Public domain works and improved through site links.

The proposal is made under Chapter 2, Part 2, Division 1 of the State Environmental Planning Policy (Housing) 2021 (**Housing SEPP**) as the proposal includes more than 10% affordable housing and is located within an accessible area.

The proposal includes 15% GFA of affordable housing to be managed by a registered community housing provider for a 15-year period to utilise the height and floor space bonuses in the Housing SEPP. Refer to **Appendix G** for further information regarding Bridge Housing (ABN 55 760 055 094), the chosen community housing provider.

## 1.2 Project Amendments

Amendments to the project are proposed to respond to the matters raised by DPHI, Council, State agencies and to address concerns raised by the community during the public exhibition period. The proposed amendments include the following changes to the proposed development which have been reflected in the Architectural Plans at **Appendix B**.

Table 1 List of Project Amendments

Amendment	Changes to the plans	Addressing
<b>Affordable Housing Consolidation</b>	<ul style="list-style-type: none"> <li>▪ Affordable units of have been consolidated into the William Street West building.</li> <li>▪ Affordable GFA has increased from 4,949sqm to 4,979sqm, while the total number of affordable units has been reduced from 60 to 58.</li> <li>▪ P2 - Bike and storage updated to suit revised parking layout.</li> <li>▪ P4 - Lift core extended to basement per structural comments.</li> <li>▪ P7 - Plan layout revised to accommodate updated lift core.</li> <li>▪ P13 - Former affordable units in Forbes Street building converted to market build-to-sell units.</li> <li>▪ P15 - Layouts reconfigured to accommodate new core.</li> <li>▪ P18 - Affordable units relocated and layout reconfigured.</li> <li>▪ P20 - Upper-level affordable units in the William Street West building converted to build-to-sell market dwellings.</li> <li>▪ P23 - Tandem parking has been incorporated where feasible.</li> <li>▪ E3 - Elevations updated to suit revised affordable layout, per DIP comments.</li> <li>▪ E5 - Façade modified in line with plan changes, as per DIP comments.</li> </ul>	In response to DIP comments

- E7 – Balconies and windows reconfigured to improve solar access.

<b>Façade Modifications and Design Refinements</b>	<ul style="list-style-type: none"> <li>▪ P14 – View-driven angled units reconfigured in response to DIP comments.</li> <li>▪ P19 – Façade modification to enhance solar access to corner unit in William Street building.</li> <li>▪ E2 – Overhang depth reduced to improve daylight access to rear bedroom in William Street building.</li> <li>▪ E4 – Additional windows added to living space in William Street building to enhance daylight access in response to DIP comment.</li> <li>▪ E5 – Façade modified in line with plan changes, as per DIP comments.</li> <li>▪ E6 – Façade revised along Forbes Street to enhance visual interest as per DIP comment.</li> <li>▪ E7 – Balconies and windows reconfigured to improve solar access.</li> <li>▪ E9 – Balcony added to William Street West building to improve solar access to living space,</li> <li>▪ E11 – External louvre added to Lower William Street East building to respond to E9 changes on William Street West building.</li> <li>▪ E12 – Opacified glass louvre added to Forbes Street building lift lobby windows.</li> </ul>	In response to DIP comments
<b>Building Height</b>	<ul style="list-style-type: none"> <li>▪ Upper level of William Street West building reduced in height to minimise overshadowing, view and solar impacts.</li> <li>▪ E1 and S1 – Storey added to William Street East building to compensate reduction of one level on William Street West Building as per DIP comments.</li> </ul>	In response to Department Key Issues Letter and submissions raised during public exhibition.
<b>Roof Terrace</b>	<ul style="list-style-type: none"> <li>▪ The roof terrace has been lowered by one level to improve solar access to the living spaces of the adjacent building and improve view outcomes.</li> <li>▪ The full-height wall to the roof terrace has been removed, with the BBQ and sink relocated and replaced with transparent glass balustrade to maintain view sharing with neighbouring properties whilst mitigating wind impacts.</li> <li>▪ P21 – Roof lowered and communal space improved for neighbouring views.</li> </ul>	In response to the DPHI Key Issues Letter.
<b>Waste Improvement</b>	<ul style="list-style-type: none"> <li>▪ P5 – Stair transfer updated in line with plan updates.</li> <li>▪ P6 – Removal of Basement 1 bin room within the William East Building.</li> <li>▪ P11 – Reconfiguration of back-of-house waste collection rearrangement.</li> </ul>	In response to Council comment raised during public exhibition.
<b>Ground Plane</b>	<ul style="list-style-type: none"> <li>▪ P8 – Relocation of ground floor access corridor.</li> <li>▪ P9 – Reconfiguration of ground floor back-of-house layout.</li> </ul>	In response to DIP comments.

- P10 – Reconfiguration of ground floor retail amenities.
- P12 – Reduction of ground floor communal spaces.
- P17 – Fire control room layout updated.
- E13 – DDA lift relocated to enhance access and visibility.
- E14 – Lobby to affordable units extended to street frontage.

**Planning Refinements**

- P3 – Lift lobby doors removed in basement levels.
- P16 – Dowling Street building unit layouts updated.
- P12 – Reduction and replanning of ground floor communal spaces.
- P19 – Façade modification to enhance solar access to corner unit.
- P22 – Driveway entry reduced to 6m in width as per RFAI request.
- P24 – Juliet balcony added to roof where feasible per DIP comments.
- P25 – Living space reconfigured for optimal function and flow.
- P26 – Window added to improve daylight access and natural ventilation.
- E8 – Additional mezzanine units added; façade adjusted accordingly.
- E10 – Dowling Street balcony updated with the plan.
- E15 – Window added to façade to improve daylight access and natural ventilation.
- S2 – Extra mezzanine units added to optimise building efficiency.

In response to DIP comments, DPHI Key Issues Letter, Council and community comments raised during public exhibition.

# Response to Submissions

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## 1.3 Supporting Documentation

This Submissions Report is supported by the following amended technical reports and documentation.

Table 2 Supporting Documentation

Reference	Document	Prepared By
Appendix A	Response to Submissions Table	Urbis
Appendix B	Updated Architectural Drawings	FJC Studio, Tribe Studio, Studio Bright
Appendix C	Updated Statutory Compliance Table	Urbis
Appendix D	Updated Mitigation Measures Table	Urbis
Appendix E	Updated Landscape Plans	FJC Studio
Appendix F	Response to Submissions Design Report and ADG Assessment	FJC Studio
Appendix G	Updated Community Housing Provider Letter	Bridge Housing
Appendix H	RtS Visual Impact Assessment	Urbis
Appendix I	Updated Clause 4.6 Variation Report (Height)	Urbis
Appendix J	Updated Clause 4.6 Variation Report (FSR)	Urbis
Appendix K	Updated Pedestrian Wind Assessment	CPP Wind Engineering Consultants
Appendix L	Updated Survey Plan	LTS
Appendix M	Easement Plan	LTS
Appendix N	Draft Plan of Subdivision	LTS
Appendix O	Amended Noise and Vibration Impact Assessment	Renzo Tonin & Associates
Appendix P	Amended Ecologically Sustainable Development Report	Green Perch
Appendix Q	Updated Operational Waste Management Plan	Elephants Foot
Appendix R	Competitive Design Alternatives Report	Urbis
Appendix S	Contamination Site Auditor Statement	Ramboll
Appendix T	DCCEEW RFI Response Letter	Douglas Partners
Appendix U	Flood RtS Response Letter	TTW
Appendix V	Traffic RtS Response Letter	TTPP
Appendix W	Design Integrity Panel Letter 3	Urbis
Appendix X	Cross Ventilation RFI Response Letter	RWDI
Appendix Y	BCA RFI Response Letter	Jensen Hughes
Appendix Z	Updated BASIX Certificate	Green Perch

# Analysis of Submissions

This section provides a summary of the submissions received including a breakdown of respondent type, nature / position and number of submissions received.

All submissions were managed by DPHI, which included registering and uploading the submissions onto the 'Major Projects website' (SSD-80211463).

## 1.4 Breakdown of Submissions

The SSDA was publicly exhibited between 30 October 2025 and 13 November 2025.

A total of 156 submissions were received during and immediately following the exhibition period. This included:

- One (1) submission from Council
- One (1) submission from an interest group
- 153 submissions from members of the local community and individuals

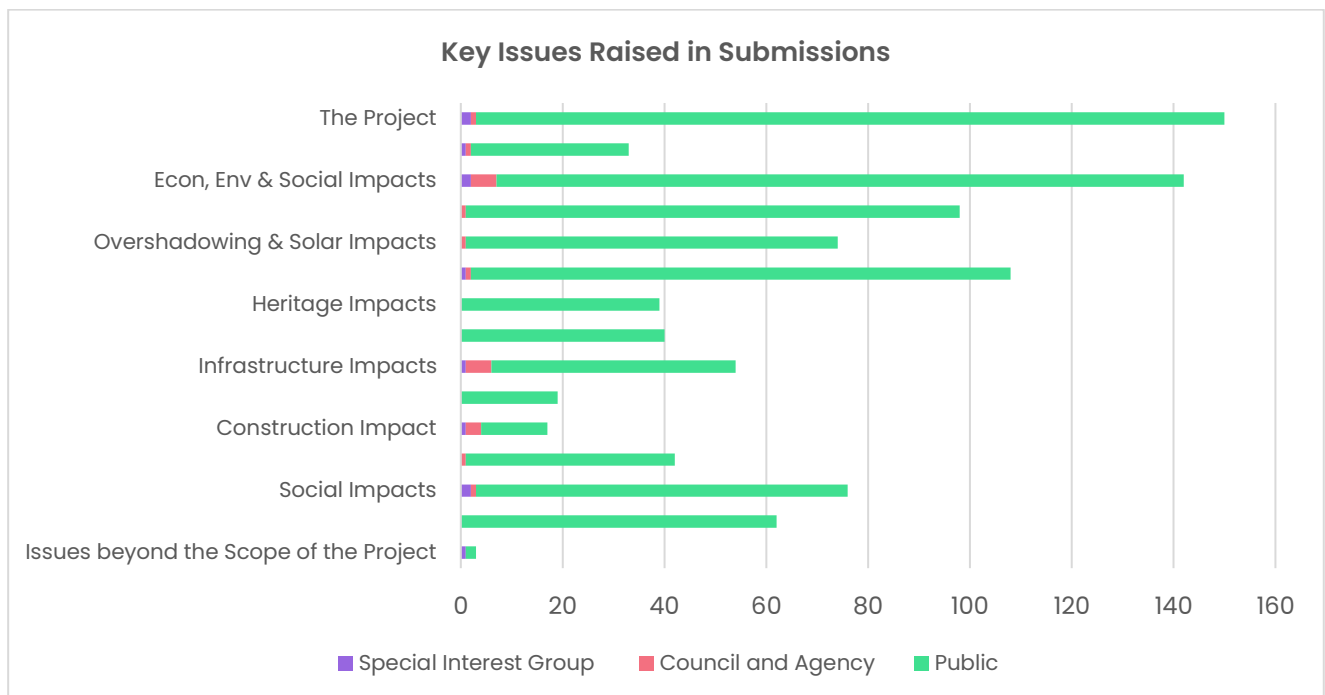
Of all the submissions received, six (6) expressed support for, or no objection to, the proposal, one (1) provided comment without stating a position, and 149 objected to the proposal.

In addition to the above submissions, the following was also received:

- Three (3) x public feedback received outside of the exhibition period
- Five (5) x government agency or utility service provider advice
- One (1) key issues letter from the DPHI

A breakdown of submissions by respondent type and the key issues raised is provided below. The submissions register included at **Appendix A** provides further detail on the matters raised in individual submissions. Responses to the key issues identified are provided in **Section 4** of this report.

Figure 2 Key Issues Raised in Submissions



The table below provides a summary of the submissions received and their breakdown.

Table 3 Summary of Public Submissions

Source	Position	Number of Submissions
<b>Special Interest Groups:</b> Cancer Council	Support	0
	Neutral / Comment	0
	Object	1
<b>General Public:</b>	Support	6
	Neutral / Comment	2
	Object	147
<b>Local Council:</b> CoS Council	Support	0
	Neutral / Comment	0
	Object	1
<b>Council and Agency:</b> Sydney Water, Ausgrid, SES, DCCEEW Water Group, TfNSW	Support	0
	Neutral / Comment	3 (Sydney Water, Ausgrid, DCCEEW Water Group)
	Object	2 (TfNSW, SES)
<b>Public Feedback:</b> Received outside public exhibition period.	Support	0
	Neutral / Comment	2
	Object	1 (Alex Greenwich MP)

## 1.5 Categorisation of Submissions

### 1.5.1 Council and Agency Advice

A total of five (5) advice letters were received from government agencies during the public exhibition of the SSDA. An additional submission was received from CoS which objected to the proposal. A summary of the government agency advice and Council submission is provided in **Table 3**.

Table 4 Summary of Council and public agency submissions

Public Authority	Position
CoS Council	<p>Provided the following comments:</p> <ul style="list-style-type: none"> <li>Objects to the application as currently proposed, citing significant departures from the approved Concept DA and insufficient justification for Clause 4.6 variations to building height and floor space ratio</li> <li>Raises concerns regarding building massing, view sharing, wind impacts and apartment amenity, including solar access and natural cross-ventilation non-compliance with the ADG</li> <li>Does not support the proposed affordable housing approach, including the quantum, duration, calculation methodology and inequitable amenity outcomes</li> <li>Identifies design excellence issues, including missing competitive design alternatives documentation and unresolved matters relating to internal layouts, floor-to-floor heights and private open space</li> <li>Raises concerns regarding deep soil provision, landscape design, tree canopy outcomes and reliance on land to be dedicated to the City</li> <li>Supports publicly accessible open space in principle, subject to securing public access, appropriate land dedication and compliance with contribution requirements</li> </ul>

- Requests further information and amendments relating to wind comfort, water management, flooding, contamination and remediation
- Considers the proposed car parking provision excessive and requests alignment with Sydney Local Environmental Plan 2012 (**SLEP**) parking rates, revised driveway widths and compliant bicycle parking
- Requests an updated waste management plan demonstrating compliance with Sydney Development Control Plan 2012 (**SDCP**) requirements

TfNSW	<p>Provided the following comments:</p> <ul style="list-style-type: none"> <li>▪ Advises the site is located above the Cross City Tunnel and within TfNSW-owned subsurface land and easement zones</li> <li>▪ Does not support the application in its current form due to insufficient information to assess impacts on the Cross City Tunnel</li> <li>▪ Requests additional documentation, including detailed site, interface, architectural and structural drawings showing excavation and structures relative to tunnel protection and easement zones</li> <li>▪ Requires a comprehensive construction impact assessment, including geotechnical analysis, structural impact assessment, and instrumentation and monitoring</li> <li>▪ Notes an interface agreement with Transurban Cross City Tunnel may be required prior to construction</li> </ul>
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Sydney Water	<p>Provided the following comments:</p> <ul style="list-style-type: none"> <li>▪ Advises that water and wastewater servicing should be available for the proposed development, subject to detailed assessment</li> <li>▪ Notes that minor adjustments, amplifications or extensions to services may be required</li> <li>▪ Recommends conditions of consent requiring a Section 73 Compliance Certificate and Building Plan Approval</li> <li>▪ Advises that detailed servicing requirements will be determined at the Section 73 application stage</li> </ul>
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Ausgrid	<p>Provided the following comments:</p> <ul style="list-style-type: none"> <li>▪ Requests ongoing coordination with Ausgrid regarding electrical connections and load requirements, including submission of a connection application</li> <li>▪ Advises that underground cables, overhead powerlines and a kiosk substation are located in the vicinity of the site and must be protected during construction</li> <li>▪ Requires compliance with minimum safety clearances, fire separation, ventilation separation and access requirements in accordance with Ausgrid network standards and relevant Australian Standards</li> <li>▪ Requires existing Ausgrid easements, leases and access rights to be maintained, and notes any asset relocation would be at the developer's cost</li> </ul>
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SES	<p>Provided the following comments:</p> <ul style="list-style-type: none"> <li>▪ Raises public safety concerns relating to flooding and emergency management, noting the site is affected by high hazard flooding up to the PMF</li> <li>▪ Recommends all basement openings be located above the PMF or 1% AEP plus freeboard, or that basement parking be reconsidered</li> <li>▪ Requests the proposal demonstrate consistency with the NSW Shelter in Place Guideline to ensure risks to life are adequately managed</li> <li>▪ Advises flooding issues be assessed in accordance with the NSW Flood Prone Land Policy and Flood Risk Management Manual</li> </ul>
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DCCEEW Water Group	<p>Provided the following comments:</p> <ul style="list-style-type: none"> <li>▪ Requests clarification of the basement drainage design and pump-out system used to inform the groundwater seepage analysis</li> </ul>
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- Recommends the groundwater impact assessment be revised if the basement drainage design changes
- Advises the Applicant must demonstrate sufficient entitlement under a Water Access Licence, unless an exemption applies
- Notes groundwater inflows during construction and operation may trigger licensing and monitoring requirements under the Water Management Act

## 1.5.2 Special Interest Group Submissions

One submission from a special interest group was received during the public exhibition of the SSDA. A summary is provided in **Table 4**.

Table 5 Summary of special interest group submissions

Special Interest Group	Position
<b>Cancer Council NSW</b>	<p>Provided the following comments:</p> <ul style="list-style-type: none"> <li>Not opposed to the development in principle but formally objects in its current form due to potential impacts on its nearby offices</li> <li>Raises concerns regarding the absence of a Construction Management Plan, particularly in relation to maintaining pedestrian and vehicular access during the construction period</li> <li>Identifies potential construction impacts including noise, dust, traffic, vibration and pressure on local infrastructure</li> <li>Raises health and safety concerns associated with demolition and construction, including management of hazardous materials</li> <li>Raises concerns regarding the adequacy of consultation undertaken with Cancer Council NSW</li> </ul>

## 1.5.3 Public Submissions

A total of 155 submissions from community members were received during the public exhibition of the SSDA. A summary of the community group submissions is provided in Table 6.

Table 6 Summary of issues raised in submissions

Category	Position
Economic, Environmental and Social Impacts	<p>86% of public submissions raised matters relating to broader economic, environmental and social considerations, including:</p> <ul style="list-style-type: none"> <li>The scale of the proposal and its implications for residential amenity and local character</li> <li>Potential cumulative impacts when considered alongside other major developments in the precinct</li> <li>Perceived pressure on local infrastructure, services and public transport</li> <li>Requests for clearer articulation of how the proposal's public benefits balance its impacts</li> </ul>
The Project	<p>95% of public submissions raised matters relating to the proposal as a whole, including:</p> <ul style="list-style-type: none"> <li>The overall scale, height and density of the development</li> <li>The extent of change from the previously approved concept envelope</li> <li>Whether the proposal represents an appropriate outcome for the site and surrounding context</li> </ul>
Traffic & Parking	<p>68% of public submissions raised matters relating to traffic and parking, including:</p> <ul style="list-style-type: none"> <li>Potential increases in traffic congestion on William Street and surrounding local streets</li> <li>Accuracy of traffic assumptions, including site access arrangements</li> <li>The need to consider cumulative traffic impacts from nearby developments</li> <li>The quantum and distribution of car parking in a highly accessible inner-city location</li> </ul>
View Impact	<p>62% of public submissions raised matters relating to views and visual amenity, including:</p>

	<ul style="list-style-type: none"> <li>▪ Potential loss or reduction of views towards Sydney Harbour, the Harbour Bridge, the Opera House and city skyline</li> <li>▪ The application of view-sharing principles to surrounding residential properties</li> <li>▪ Requests for additional or more representative visual impact analysis</li> </ul>
Overshadowing and Solar Access	<p>47% of public submissions raised matters relating to solar access and overshadowing, including:</p> <ul style="list-style-type: none"> <li>▪ Potential increases in overshadowing of neighbouring dwellings, streets and open spaces</li> <li>▪ Reduced access to daylight, particularly during winter months</li> <li>▪ Requests for clarification or refinement of the submitted shadow diagrams</li> </ul>
Social Impact	<p>47% of public submissions raised matters relating to social considerations, including:</p> <ul style="list-style-type: none"> <li>▪ The potential effects of increased density on community wellbeing and neighbourhood character</li> <li>▪ Safety and activation of publicly accessible spaces</li> <li>▪ How social impacts have been assessed and managed at both the site and precinct scale</li> </ul>
Justification and Evaluation of the Project	<p>40% of public submissions raised matters relating to the planning justification of the proposal, including:</p> <ul style="list-style-type: none"> <li>▪ Consistency with local and state planning controls and strategies</li> <li>▪ The extent of reliance on height and floor space variations</li> <li>▪ Whether the affordable housing component provides sufficient justification for the scale of uplift sought</li> </ul>
Impact on Infrastructure	<p>33% of public submissions raised matters relating to infrastructure capacity, including:</p> <ul style="list-style-type: none"> <li>▪ Demand on roads, parking, utilities and emergency services</li> <li>▪ The need for coordinated, precinct-wide infrastructure planning</li> </ul>
Wind	<p>30% of public submissions raised matters relating to wind conditions, including:</p> <ul style="list-style-type: none"> <li>▪ Potential changes to pedestrian comfort and safety at street level</li> <li>▪ The effectiveness of proposed wind mitigation measures</li> </ul>
Residential Impacts	<p>26% of public submissions raised matters relating to residential amenity, including:</p> <ul style="list-style-type: none"> <li>▪ Noise impacts from communal and rooftop areas</li> <li>▪ Building proximity, scale and effects on outlook and liveability</li> </ul>
Heritage	<p>25% of public submissions raised matters relating to heritage, including:</p> <ul style="list-style-type: none"> <li>▪ The relationship of the proposal to nearby heritage items and conservation areas</li> <li>▪ The appropriateness of scale and massing within the historic urban context</li> </ul>
Loss of Privacy	<p>12% of public submissions raised matters relating to privacy, including:</p> <ul style="list-style-type: none"> <li>▪ Overlooking between new and existing residential buildings</li> <li>▪ Setbacks and separation distances</li> </ul>
Issues Beyond the Scope of the Project	<p>0.6% of public submissions raised matters outside the scope of the assessment, including:</p> <ul style="list-style-type: none"> <li>▪ The affordable housing component of the proposal will be temporarily affordable for a 15-year period</li> <li>▪ Broader policy or political issues not directly related to the proposal</li> </ul>

## 1.5.4 Feedback

Three submissions were received after the public exhibition period and have thus been classified as “feedback” rather than “submissions”. One of these is from the Member for Sydney Alex Greenwich, while the other two are from members of the public. These are summarised in **Table 7** below.

Table 7 Feedback

Feedback sender	Summary of feedback
<p><b>Independent Member for Sydney – Alex Greenwich</b></p>	<p>Provided the following comments:</p> <ul style="list-style-type: none"> <li>▪ Raises concerns regarding excessive bulk and scale, particularly increased building heights along William Street, citing streetscape, wind and pedestrian amenity impacts</li> <li>▪ Supports provision of a public plaza and neighbourhood park but recommends relocation to William Street to improve activation, safety and passive surveillance</li> <li>▪ Considers the proposed car parking provision excessive given the site’s accessibility and low car ownership rates, and recommends a significant reduction</li> </ul> <p>Supports affordable housing in principle but objects to the 15-year time-limited model, recommending affordable housing in perpetuity or a reduction in bulk and scale</p>
<p><b>Robyn Hall</b></p>	<p>The key concerns raised in this feedback include:</p> <ul style="list-style-type: none"> <li>▪ Construction and demolition impacts are expected to significantly disrupt already congested streets, affecting traffic, access and safety.</li> <li>▪ Road narrowing and expansion of cycleways are seen as reducing amenity and access for residents, businesses, emergency services and visitors.</li> <li>▪ Strong concern about loss of heritage and historic character due to demolition of valued buildings and unfulfilled heritage commitments.</li> <li>▪ Perception that council decisions prioritise policy agendas over local community needs and concerns.</li> </ul>
<p><b>Spiro Haginikitas</b></p>	<p>The key concerns raised included:</p> <ul style="list-style-type: none"> <li>▪ Potential loss of significant views, including the Sydney Harbour Bridge, Sydney Opera House, and parts of the Domain and Royal Botanic Gardens.</li> <li>▪ Visual dominance and scale of the proposed development relative to surrounding residential buildings.</li> <li>▪ Reduced residential amenity, including loss of outlook, relaxation, and tranquillity for nearby residents.</li> <li>▪ Impact on property values and original purchase decisions that were based on access to inspiring views.</li> </ul>

## 2 Actions Taken Since Exhibition

In response to the key issues raised within the submission, design refinements and clarifications have been made to the proposed development since public exhibition.

This section summarises the changes that have been made to the project since its public exhibition. It also outlines the additional assessment undertaken to respond to the concerns raised with the public agency, organisation and public submissions.

### 2.1 Further Engagement

#### *Department of Planning Housing and Infrastructure*

On 28 January 2026, the Applicant met with the DPHI to discuss the key issues raised in agency, Council and public submissions, and the proposed approach to responding to those matters in the RtS report.

The meeting included a presentation of the project team's proposed response strategies and design refinements, with the purpose of confirming whether the proposed approach would be sufficient to enable DPHI to continue its assessment following lodgement of the RtS report. At a high level, the discussions addressed matters including the relocation of the affordable housing, the approach to further visual analysis, building height and massing options, the future character of the surrounding area, overshadowing, driveway locations and wind impacts.

The feedback provided by DPHI during this meeting has informed the refinement of the proposal and has been incorporated into the updated design and supporting documentation submitted with this RtS package.

#### *City of Sydney Council*

Since January 2026, the Applicant has been engaging with the CoS Council Planning Agreements team in relation to the existing Voluntary Planning Agreement (VPA) over the site.

Engagement with Council has focused on resolving administrative matters associated with the VPA. This includes updating the description of the development and novating the VPA to the new owners and developer. A draft Deed of Novation and Variation was prepared by CoS and issued to the applicant on 4 March 2026. The applicant returned a signed copy to the City on 14 April 2026.

#### *Transport for NSW*

In response to TfNSW's correspondence dated 19 November 2025, the Applicant has been actively engaging with TfNSW, led by Phil Clark (Director Tunnel Structures), to address their queries and progress the required technical work.

Engagement with TfNSW has been ongoing since December 2025. In early February 2026, a meeting was held with TfNSW to confirm the information required to commence preparation of a formal response to their RFI. The objective has been to agree a clear and acceptable framework for assessing the potential impact of the development on existing tunnel infrastructure, and to establish a pathway toward approval. Engagement with TfNSW has been constructive, and a workable pathway forward is now established.

TfNSW has confirmed that:

- A fully definitive structural assessment is not achievable due to limitations in original tunnel information.
- A risk-based approach, supported by robust assumptions and scenario modelling is acceptable.
- Any identified risks can generally be managed through monitoring and mitigation measures, rather than precluding development.
- TfNSW has agreed the proposed modelling criteria for the modelling works.

The roles and responsibilities of the applicant, TfNSW and the tunnel operator have been clarified.

. The agreed approach is outlined as follows:

1. Proceed with agreed modelling approach (**complete**)
  - Clearly document all assumptions and sensitivities
2. Formalise alignment with TfNSW (**complete**)
  - Seek confirmation of key assumptions and methodology
3. Strengthen the verification strategy (**underway**)
  - Develop detailed survey and monitoring plans
4. Engage early with the operator (Transurban) (**ongoing**)
  - Align on expectations and mitigate approval risk
5. Maintain proactive coordination (**ongoing**)
  - Continue structured engagement to drive resolution of remaining issues.

The Applicant will remain in regular communication with TfNSW while progressing the response and will continue to update DPHI as further information becomes available.

### **Design Integrity Panel**

A third DIP session was held on 11 March 2026 and was attended by the DIP members, FJC Studio, Urbis and the Applicant, with representatives of the Government Architect NSW and CoS Council observing. The Panel reviewed the refined scheme, including amendments to building massing, apartment layouts, façade design, ADG compliance, the relocation and consolidation of the affordable housing, access arrangements and public domain interfaces.

The DIP reaffirmed its support for the overall massing strategy and acknowledged that the proposal continues to demonstrate a considered and skilful response to the site and surrounding context while accommodating the Housing SEPP uplift. The Panel confirmed that the development remains capable of achieving design excellence, subject to further design development to address the matters identified in its feedback. The Response to Submissions Design Report at **Appendix F** provides a breakdown of the Panel's comments and how they have been addressed. A summary of the key issues and the relevant project response is provided in Section 4.1 of this report.

### **Cancer Council Engagement**

On 5 December 2025, the Applicant and Urbis met with representatives of Cancer Council NSW (CCNSW) to discuss matters raised in CCNSW's submission during public exhibition. The meeting confirmed that the proposed works will not impact vehicular access to Judge Lane or Judge Street, that 24-hour access to the CCNSW office via Judge Lane will be maintained, and that construction activity will be limited to a defined works zone within existing parking areas on Dowling and Forbes Streets. It was also confirmed that dilapidation reports will be prepared both prior to and following completion of the works. The Applicant will continue to engage with CCNSW to minimise construction-related impacts on its operations.

# 3 Response to Submissions

Due to the large number of submissions received, a detailed response to each submission has been provided in table format in **Appendix A** of this report.

# Amendment Report

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# 4 Amendment Report

This section of the report described the proposed amendments and design refinements and provides a comparative analysis of the original development and amended proposal. It also includes an updated detailed description of the various components of the proposal, including the demolition, site preparation, construction and operational phases.

## 4.1 Amended Project Description

The Amendment Report seeks changes to the original development proposal. The amended project description and works for which the SSDA seeks consent are:

- Demolition of existing structures and excavation for 4 basement levels.
- Construction of a mixed-use precinct, comprising 4 buildings ranging in height from 6 storeys to 19 storeys, including:
  - 33,036sqm of gross floor area (**GFA**), equating to an FSR of 5.16:1.
  - 235 apartments, comprising the following mix:
    - 177 market apartments.
    - 58 affordable housing apartments to be managed by a CHP for 15 years.
- Ground floor retail uses and within the first floor along William Street.
- Four levels of basement for 300 residential parking spaces, 13 retail and 17 visitor parking spaces.
- Vehicular and loading access from Forbes Street.
- A 1,356 sqm publicly accessible park.
- A new laneway, connecting Judge Lane to Dowling Street.
- Public domain works and improved through site links.
- Amalgamation of existing lots and land subdivision to create a single development lot and a separate to for the dedicated VPA land.

## 4.2 Proposed Land Subdivision

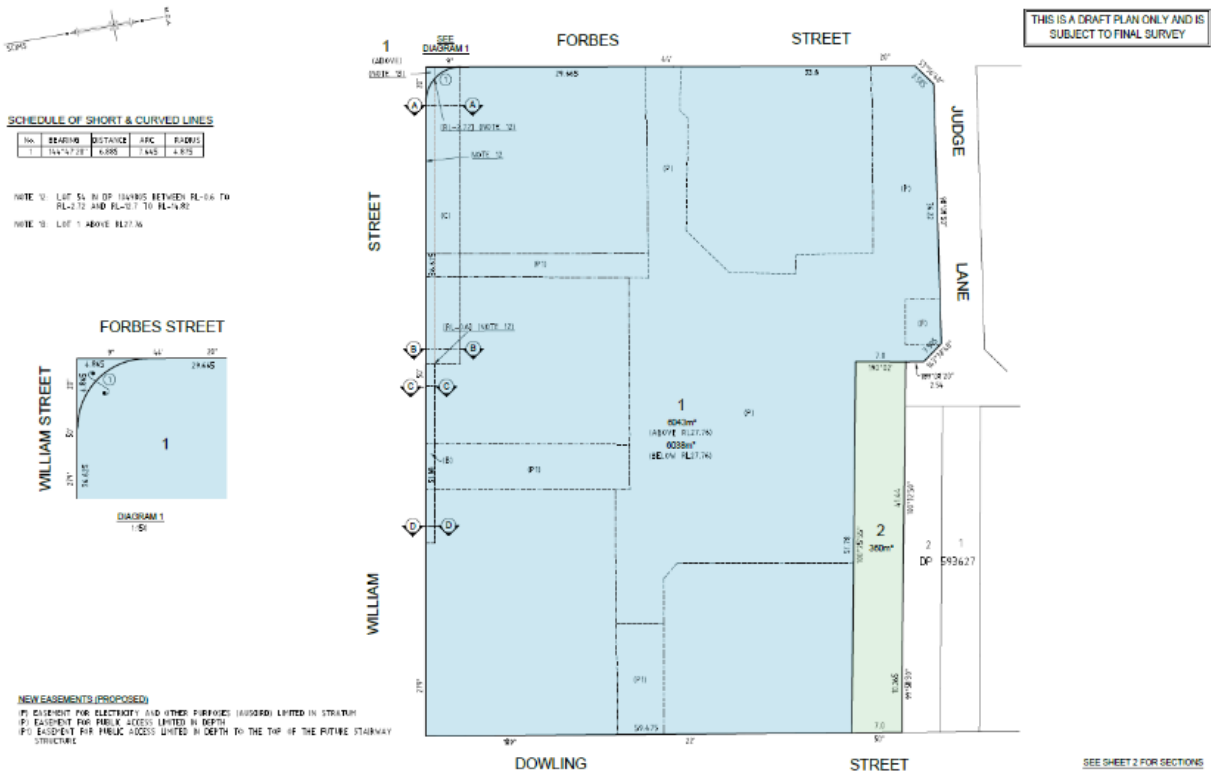
The application has been amended to include the proposed amalgamation of lots and subdivision of the land in accordance with the Draft Plan of Subdivision in **Figure 2** below (also included at **Appendix N**).

This clearly identifies the two lots proposed, which include:

- The proposed development site – 6043sqm (1)
- The dedicated VPA land – 360sqm (2)

The location of easements relating to publicly accessible open space and public access have also been identified on this plan. The four buildings will be located on one Torrens title. It is also noted that the strata subdivision of the site will occur prior to the occupation of the site. As requested by the CoS and queried by DPHI, subdivision is proposed under this application to allow the VPA land to be dedicated to the CoS and to allow the CoS to be the Principal Certifier for the works to be carried out on this land.

Figure 3 Draft Plan of Subdivision



Source: LTS

### 4.3 Amended Building Envelope

During the pre-lodgement design process, a range of building envelope options were assessed by the design team prior to finalising the SDA lodged scheme. The lodged envelope was supported by the DIP in relation to its overall massing at the second DIP meeting.

Following public exhibition, the proposed building envelope has been further refined in response to concerns regarding view impacts raised by CoS Council, the DPHI, and community members.

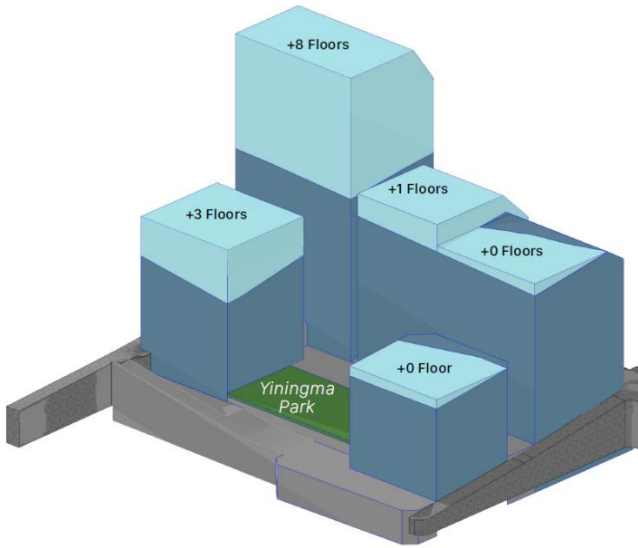
Informed by additional view analysis and as requested by the DPHI, the central pop up on the William Street building has been removed (reduction of 1 storey and 3.2m) and relocated into the William Street East Building (increase of 1 storey and 3.3m).

The rooftop elements within the William Street west portion of the building have also been relocated to improve view sharing to Icons. A glass balustrade has been proposed to ensure views remain unobstructed.

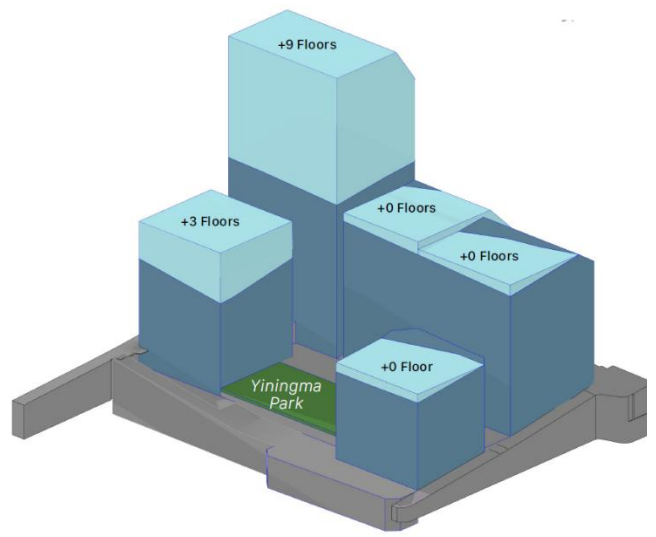
This redistribution of building mass represents a strategic adjustment, relocating built form to further enhance view sharing across the site.

This revised massing option has been assessed against the base 30% uplift scheme in Section 4.1, with the implications for view impacts considered in detail in Section 4.2 of this report. The redistribution of height has been undertaken to better manage view sharing and reduce impacts on surrounding properties, while maintaining the overall development yield and strategic objectives of the proposal. It is noted that the relocation of the additional storey continues to retain solar access compliance to neighbouring residents.

Figure 4 Revised Building Massing

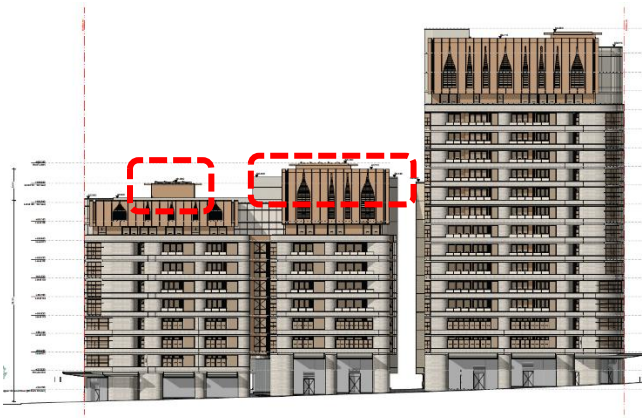


Picture 1 Option 6 – SSDA lodgement scheme  
Source: FJC Studio

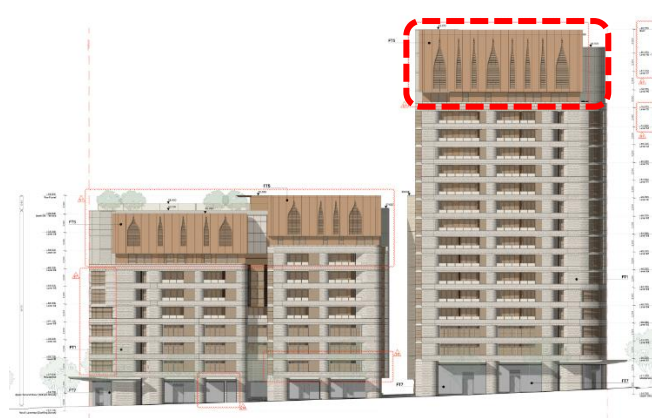


Picture 2 Option 7 – RtS revised scheme  
Source: FJC Studio

Figure 5 William Street Elevation



Picture 3 Lodged William Street Elevation showing areas proposed to be removed  
Source: FJC



Picture 4 RTS William Street Elevation showing new additions  
Source: FJC

## 4.4 Overview and Comparative Analysis

**Table 8** below outlines the key differences between the lodged scheme and the refined proposal accompanying this Rts report. Further detail can be found in the appended technical documentation.

Table 8 Comparison with Lodged Scheme

Aspect of the Proposal	Lodged Proposal	Rts Proposal	Change
<b>Building Height</b>	<ul style="list-style-type: none"> <li>William East (William Street Frontage) – 66.3m (RL86.47)</li> <li>Central massing – 45.9m (RL63.140)</li> <li>Dowling Street – 35.8m (RL53.38)</li> <li>Forbes Street – 24.1m (RL37.550)</li> </ul>	<ul style="list-style-type: none"> <li>William East (William Street Frontage) – 68.8m (RL89.77)</li> <li>Central massing – 42.7m (RL59.90)</li> <li>Dowling Street – 35.8m (RL53.38)</li> <li>Forbes Street – 24.1m (RL37.550)</li> </ul>	<ul style="list-style-type: none"> <li>William East: +3.3m</li> <li>Central massing: -3.2m</li> <li>Dowling Street: No change</li> <li>Forbes Street: No change</li> </ul>
<b>Number of Storeys</b>	Basement: <ul style="list-style-type: none"> <li>4 basement levels</li> </ul> Above ground: <ul style="list-style-type: none"> <li>7 to 18 storeys above ground</li> </ul>	Basement: <ul style="list-style-type: none"> <li>4 basement levels</li> </ul> Above ground: <ul style="list-style-type: none"> <li>7 to 19 storeys above ground</li> </ul>	Basement: <ul style="list-style-type: none"> <li>No change</li> </ul> Above ground: <ul style="list-style-type: none"> <li>1 storey above ground</li> </ul>
<b>GFA</b>	33,036sqm	33,036sqm	No change.
<b>Retail GFA</b>	1,718sqm	1,743sqm	+25sqm
<b>Market Housing GFA</b>	26,294sqm 167 apartments	26,314sqm 177 apartments	+20sqm + 10 apartments
<b>Affordable Housing GFA</b>	5,024sqm 60 apartments	4,979sqm 58 apartments	-45sqm GFA (15.1% affordable housing) -2 apartments
<b>Communal GFA</b> (It is noted that this area is included in the above affordable housing and market housing GFA calculations)	504sqm	224sqm which includes: 25sqm affordable housing communal GFA 199sqm market housing communal GFA	-280sqm
<b>Market Housing Unit Mix</b>	<ul style="list-style-type: none"> <li>1 + bedroom = 12</li> <li>2 bedroom = 47</li> <li>2 + bedroom = 6</li> <li>3 bedroom = 1</li> <li>3 + bedroom = 41</li> <li>3 ++ bedroom = 47</li> <li>Penthouse = 13</li> </ul>	<ul style="list-style-type: none"> <li>1 + bedroom = 19</li> <li>2 bedroom = 55</li> <li>2 + bedroom = 9</li> <li>3 + bedroom = 44</li> <li>3 ++ bedroom = 37</li> <li>Penthouse = 13</li> </ul>	<ul style="list-style-type: none"> <li>1 + bedroom = +7</li> <li>2 bedroom = +8</li> <li>2 + bedroom = +3</li> <li>3 bedroom = -1</li> <li>3 + bedroom = +3</li> <li>3 ++ bedroom = -10</li> <li>Penthouse = No change</li> </ul>
<b>Affordable Housing Unit Mix</b>	<ul style="list-style-type: none"> <li>1 bedroom = 42</li> <li>2 bedroom = 18</li> </ul>	<ul style="list-style-type: none"> <li>1 bedroom = 36</li> <li>2 bedroom = 22</li> </ul>	<ul style="list-style-type: none"> <li>1 bedroom = -6</li> <li>2 bedroom = +4</li> </ul>
<b>Communal Open Space</b>	2,785sqm	2,785sqm	No change.
<b>Car Parking</b>	336 spaces	340 spaces	+4 spaces

## 4.5 Design refinements

### 4.5.1 Affordable Housing Distribution

The location of the proposed affordable housing units has been refined in response to concerns raised during the pre-lodgement DIP process, as well as submissions from CoS Council and the DPPI during the public exhibition of the project.

Where the affordable housing units were previously distributed across the Forbes Street and William Street West buildings, they have now been consolidated within the William Street West Building, as illustrated in **Figure 3** below. Whilst the provision of affordable housing remains at 15%, the total number of affordable housing dwellings has decreased to 58 units as a result of refinements to dwelling types when relocating these units.

Figure 6 Revised Distribution of Affordable Housing



Picture 5 Affordable Housing Distribution October 2025  
Source: FJC Studio

Picture 6 Revised Rts Affordable Housing Distribution  
Source: FJC Studio

The consolidation of the affordable housing units is the result of ongoing design development, responding to considerations of residential amenity, operational and management requirements, and the minimisation of strata costs.

The revised distribution maintains compliance with the requirements of the Housing SEPP, with 4,979sqm of affordable housing GFA proposed, equating to 15.1% of the total GFA. This represents a 30sqm increase in affordable housing GFA compared with the lodged scheme, while the total proposed GFA remains unchanged at 33,036 sqm (refer to **Table 7** for a detailed comparison between the lodged and Rts schemes). This is due to a reduction in the residential communal GFA through the internal replanning. The Response to Submissions Design Report illustrates how the GFA for the affordable housing component has been calculated. It demonstrates that only the areas specifically used for the affordable housing can be included.

A key driver for the consolidation of the affordable housing was to improve amenity. This has been achieved by the following:

- Solar access to the AH units has increased from 48% to 66%
- Cross ventilation has been improved, with 50% of apartments now achieving natural cross ventilation.

Section 5.10 of this report provides a detailed breakdown of residential amenity compliance with the Apartment Design Guide (**ADG**).

## 4.5.2 Affordable Housing Residential Address

Following further engagement with the DIP, the internal ground floor areas at both the William Street and Plaza levels have been refined. Access to the affordable housing units has been consolidated into a single, clearly legible lift lobby with direct connections from William Street and the through-site link. This responds to DIP feedback regarding clarity of access, wayfinding and equitable entry arrangements.

In addition, the design of the affordable housing lift lobby has been further refined to address amenity equity concerns identified by the DIP (refer **Table 8**). The revised lobby mirrors the opposing market housing lift lobby in size and configuration, ensuring a comparable level of amenity for all residents, as illustrated in **Picture 7 of Figure 8**.

It is noted that residential lift lobbies for the affordable housing and market housing units in the William Street West building are located separately so that the affordable housing units can sit on their own stratum and stratum fees can be appropriately managed.

Figure 7 Affordable Housing Lobby Design



Picture 7 Lodged Affordable Housing Lobby  
Source: FJC Studio



Picture 8 Revised Affordable Housing Lobby  
Source: FJC Studio

## 4.5.3 Building Façade and Apartment Layout

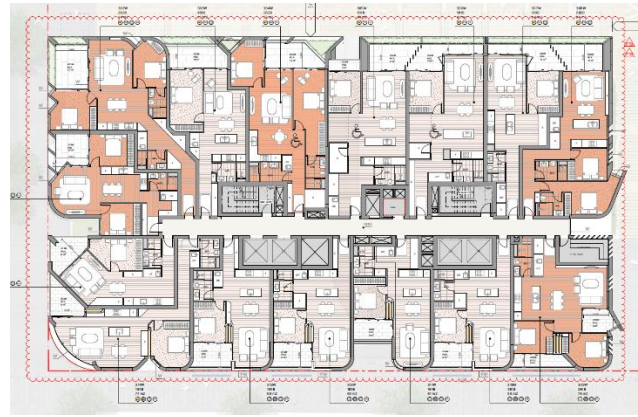
Refinements have been made to the apartment layouts and façades of the William Street and Dowling Street buildings during design development and in response to comments raised by the DIP (refer **Table 8**).

Since the lodged scheme, and in response to DIP feedback, the design of the northern façade and western facade of the William Street buildings and their internal layouts has been refined to balance solar access, privacy concerns, cross ventilation and functionality. As such, there have been minor changes to the articulation of the façades to simplify them and reduce solid elements such as privacy blades as the privacy mitigation measures have been addressed on the northern buildings and therefore are not required on the William Street building. Similarly, in response to DIP feedback, the apartment layouts have been simplified to increase efficiency and usability of space (see Figure 8 below).

Figure 8 Refined William Street Building Façade and Apartment Layouts



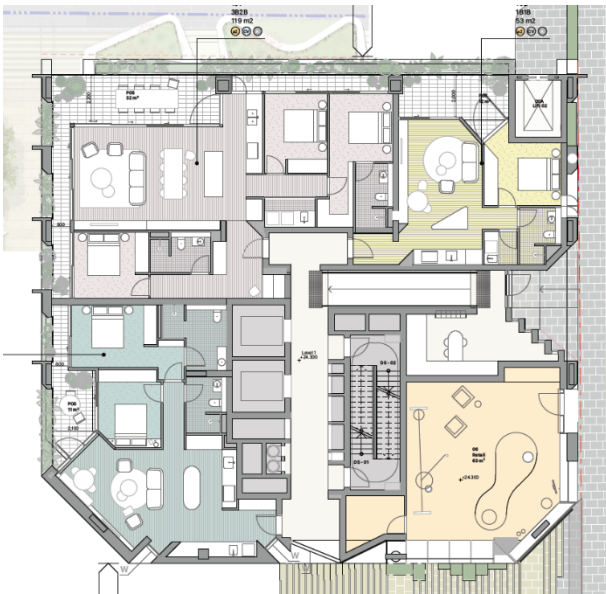
Picture 9 Lodged Façade and Apartment Layout (Level 03)  
Source: FJC Studio



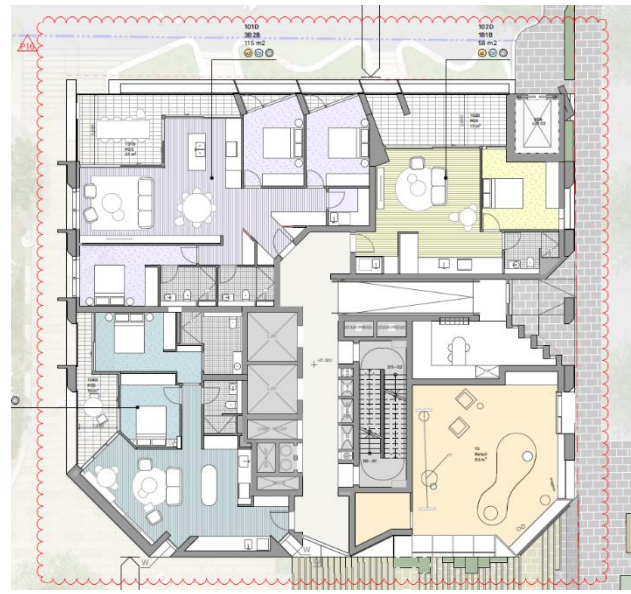
Picture 10 Rts Proposed Façade and Apartment Layout (Level 03)  
Source: FJC Studio

Similarly, in response to DIP feedback, the north-facing balconies of the Dowling Street building have been refined to provide a regular rectangular form whilst responding to privacy concerns, improving usability and delivering improved internal amenity outcomes. Internal layouts have also been adjusted to reflect this feedback.

Figure 9 Refined Dowling Street Northern Balconies and Apartments



Picture 11 Lodged Dowling Street Balconies and Apartment Layouts (Upper Ground Floor)  
Source: Tribe Studio



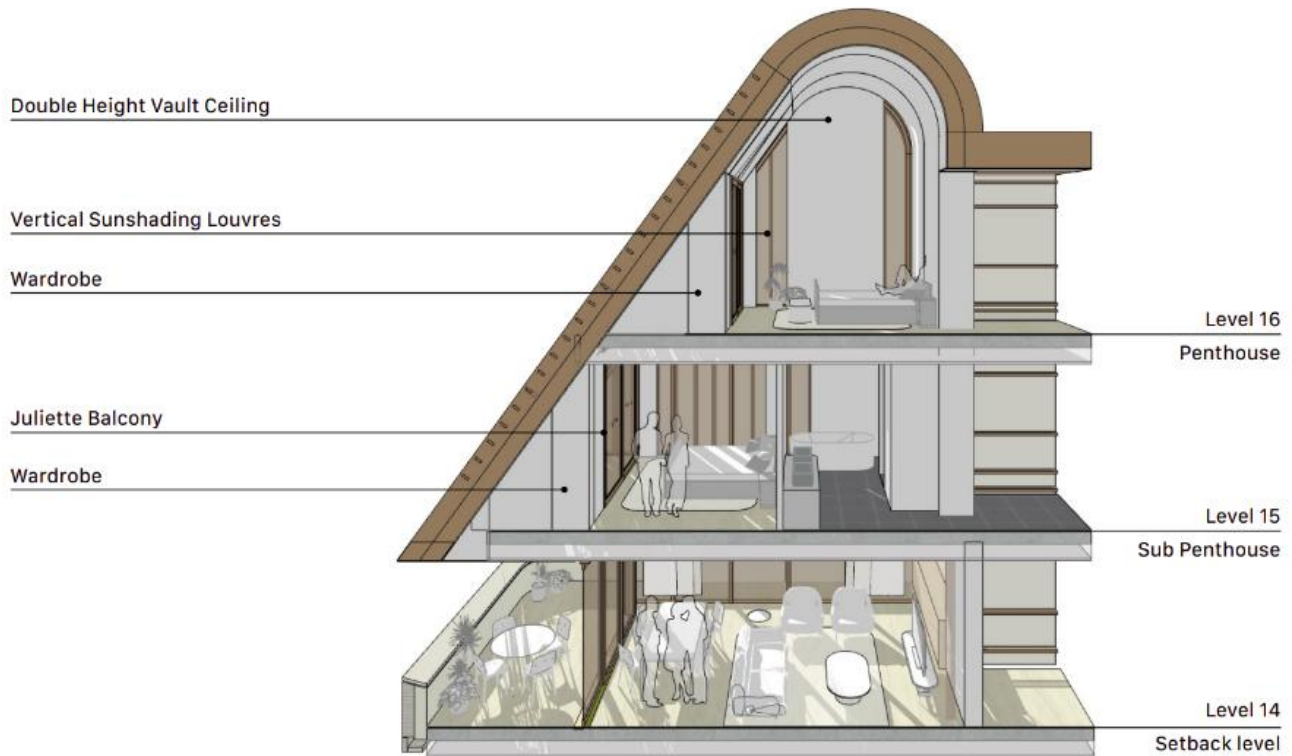
Picture 12 Rts Proposed Dowling Street Balconies and Apartment Layouts (Upper Ground Floor)  
Source: Tribe Studio

#### 4.5.4 Penthouse Thermal Comfort

In response to concerns raised by the DIP in relation to the thermal comfort of the south-facing penthouse apartments on the William Street buildings, further design refinements have been made.

Juliet balconies have been introduced in the bedrooms to enable ventilation along with vertical sun shading louvres (see Figure 10 below). Additionally, reduced glazing has been achieved through the introduction of solid facades with narrow deep windows at the east and west roof ends to regulate thermal comfort during summer.

Figure 10 Updated Penthouse Section



Source: FJC

#### 4.5.5 GFA allocation

While the total proposed GFA on the site is maintained at 33,036sqm, the GFA allocation has been amended has part of post exhibition changes and design refinements. An excerpt from Table 8 above is provided below and outlines the proposed change in the GFA breakdown from the lodged to the now proposed scheme.

The amendments to the GFA allocation include:

- A rationalisation of the internal communal areas at the lower ground levels. This has resulted in an overall reduction of internal communal space.
- Adjustments to the retail planning at the lower ground level in response to DIP feedback, regarding access and safety.
- Adjustments to the retail planning along the William Street frontage as a result of the introduction of an additional residential (AH) lobby and broader refinements. This resulted in an increase of retail GFA, offsetting the loss at the plaza level.
- Amendments to the floor plans as a result of the consolidation of the AH apartments into the William Street building and improved efficiencies. This has resulted in an increase in GFA for market housing. The project continues to deliver at least 15% of the overall GFA as affordable housing.
- Refinements to the Dowling Street building and rationalisation of apartments in response to DIP feedback.

This has allowed for an increase in both the market housing and affordable housing GFAs without increasing the overall GFA proposed. Detailed GFA diagrams have been provided at Appendix F.

Table 9 GFA Comparison

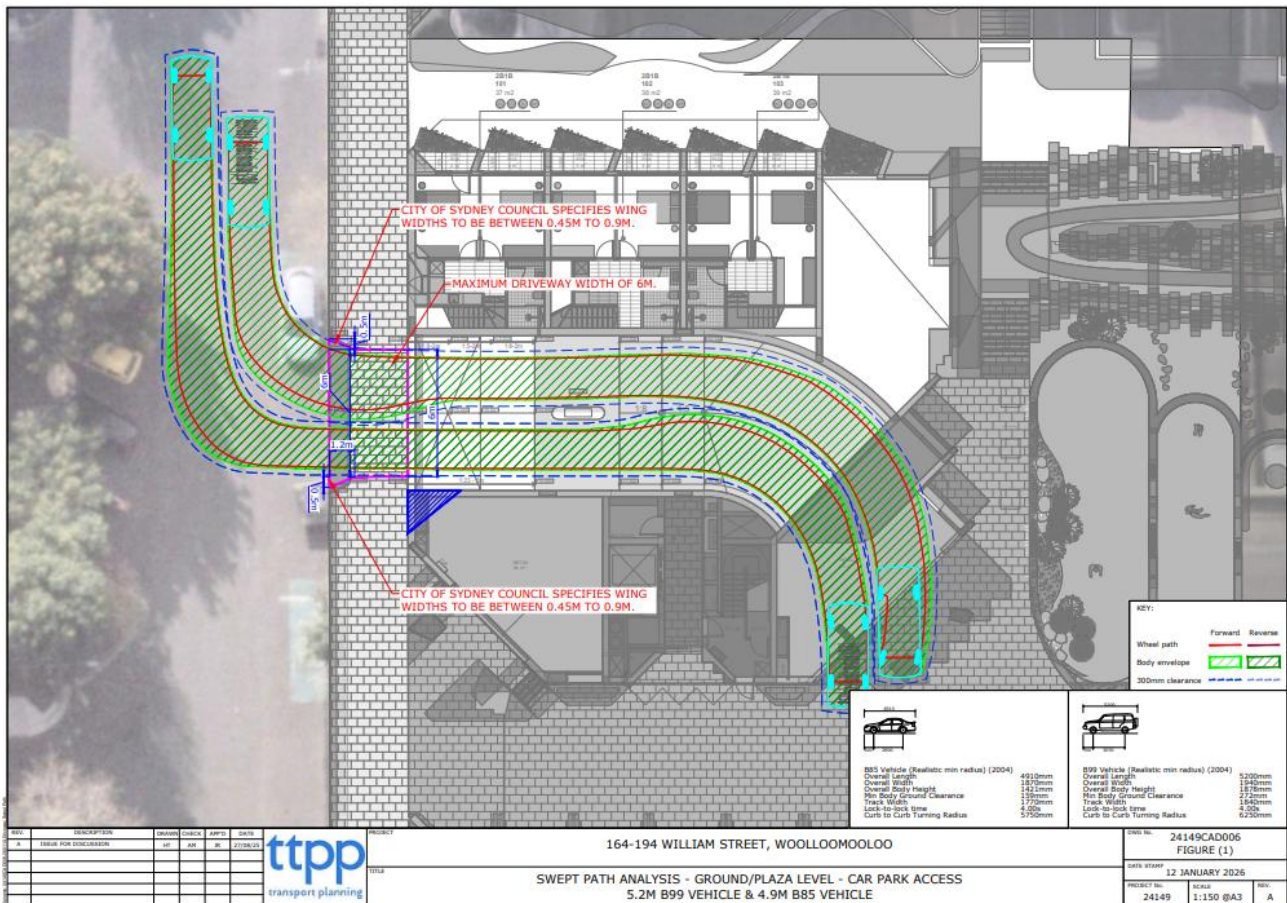
GFA Allocation	Lodged	Amended Scheme	Change
<b>GFA</b>	33,036sqm	33,036sqm	No change.
<b>Retail GFA</b>	1,718sqm	1,743sqm	+25sqm
<b>Market Housing GFA</b>	26,294sqm 167 apartments	26,314sqm 177 apartments	+20sqm + 10 apartments
<b>Affordable Housing GFA</b>	5,024sqm 60 apartments	4,979sqm 58 apartments	-45sqm GFA (15.1% affordable housing) -2 apartments
<b>Communal GFA</b> (It is noted that this area is included in the above affordable housing and market housing GFA calculations)	504sqm	224sqm which includes: 25sqm affordable housing communal GFA 199sqm market housing communal GFA	-280sqm

### 4.5.6 Driveway Crossover

In response to concerns raised regarding driveway width, streetscape impacts and the consolidation of vehicle access on Forbes Street, the proposed vehicular access arrangements have been reviewed and refined.

Importantly, the existing site conditions accommodate up to seven (7) driveway crossovers across multiple street frontages, whereas the proposed design consolidates basement access and servicing into two (2) crossovers located solely on the Forbes Street frontage. In response to the matters raised during exhibition, the two driveways proposed along Forbes Street have been reduced to a maximum width of 6 metres, plus splay, in accordance with the CoS Technical Specifications Part C. These changes have been supported by TTPP Transport Planning, including the preparation of revised swept path assessments demonstrating that the 6 metre driveway design can function appropriately.

Figure 11 Swept path diagram showing driveway width reduced to 6m



Source: TTPP

Prior to the lodgement of the SSDA, a range of vehicle access options were investigated, including the consolidation of car parking and loading access points and alternative access from Dowling Street. These options were assessed having regard to vehicle servicing requirements, site levels and the need to balance functional access with public domain outcomes. These options were presented to the CoS at the Pre-DA meeting post Design Competition, and the proposed approach was supported.

Consolidation of vehicle access was not pursued, as the gradients required to accommodate commercial and service vehicles would result in an excessively long vehicle ramp. The clearance height required for the MRV would have a consequential impact on the extent and quality of the proposed public domain, the continuity of pedestrian through-site links, and opportunities for street-level activation along William Street, particularly given the significant variation in natural ground levels across the site.

The proposed two-driveway arrangement is therefore considered to represent an appropriate balance between minimising streetscape impacts and ensuring the safe and efficient operation of vehicle entry and egress. Given the width of the site frontage to Forbes Street, the two driveways have been appropriately separated to assist in reducing potential pedestrian and vehicle conflicts.

## 4.5.7 Parking Arrangement

### Car Parking

As part of the RtS design amendments, the residential dwelling mix for both the market housing and affordable housing has been slightly adjusted. This has resulted in an increase in parking spaces from 289 to 300 residential parking spaces. A schedule of the updated parking rates is provided in **Table 6** below and is reflected in the basement drawings included in the Updated Architectural Plans at **Appendix B**.

Table 10 Updated Parking Rates

	Lodged Proposal	RtS
Market unit spaces	263	260
Affordable unit spaces	26	40
Retail spaces	10	13
Visitor spaces	32	17
Car share	5	6
B99	4	4

The provision of parking above the minimum rates specified in the Housing SEPP has been retained to future-proof the development in the event that the affordable housing units transition to market housing following the 15-year affordability period.

It is noted that the Housing SEPP does not prohibit the provision of parking in excess of the minimum rates, and that the proposed retail and residential visitor parking remains below the maximum rates permitted under the SLEP.

Overall, the proposal provides a total of 340 carparking spaces, including 300 residential spaces and 13 retail spaces. This is consistent with the 255 minimum rate for residential and 35 maximum rate for retail. The Traffic RtS Response Letter at **Appendix V** provides a detailed breakdown on parking requirements against the proposed scheme.

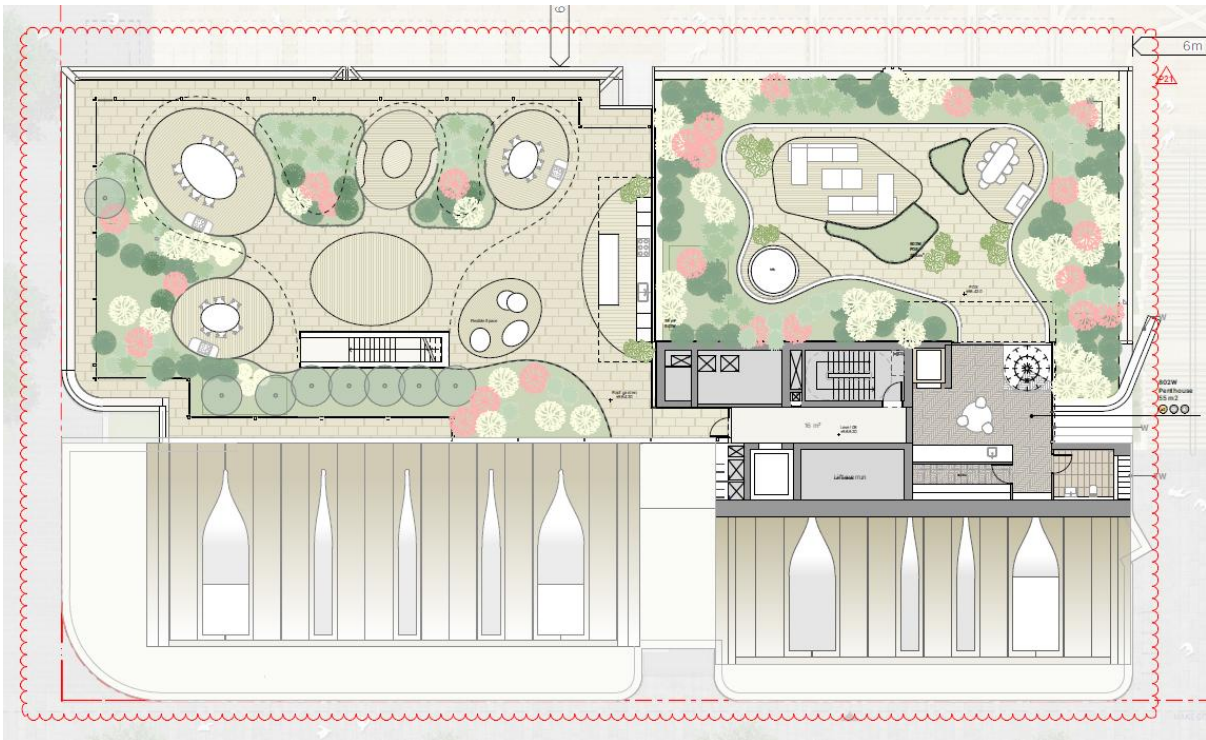
### **Bicycle Parking**

All visitor bicycle parking is provided within the site in accordance with the CoS DCP, consistent with requests made by CoS in their submission and the DPHI in the Key Issues Letter.

## **4.5.8 Wind Mitigation**

Additional wind mitigation measures have been incorporated into the proposed design to ensure that areas affected by wind achieve the relevant pedestrian comfort criteria. Rooftop areas on the William Street buildings are subject to stronger wind conditions due to their elevation and exposure. In response, high perimeter glazed balustrades with a minimum height of 1.8 metres have been incorporated, in accordance with recommendations in the Updated Pedestrian Wind Assessment (**Appendix K**). Roof articulation to the south, together with plant and lift overruns, will provide additional shielding from prevailing wind directions. These measures are anticipated to improve rooftop wind conditions, achieving Pedestrian Sitting comfort in the more sheltered southern areas and Pedestrian Walking conditions toward the more exposed northern edges.

Figure 12 Rooftop Communal Open Space



Source: FJC Studio

#### 4.5.9 Western Façade of the Forbes Street Building

In response to comments raised by the DIP, the western façade of the Forbes Street building has been refined at the ground level to enhance its visual interest. While the sandstone materiality is maintained, vertical articulation has been introduced on the northwestern corner of the building, providing animation and texture to the façade. The originally proposed window has been expanded along with the introduction of mustard snapper tiles that extend the colouring the facade to this corner. Reeded glass is proposed to ensure privacy is not compromised.

Figure 13 Refinements to the Western Façade of the Forbes Street Building



Picture 13 Lodged Scheme Forbes St Façade Design

Source: Studio Bright



Picture 14 RTS Forbes St Façade Design

Source: Studio Bright

## 4.6 Strategic Context

This section describes the way in which the amended proposal addresses the strategic planning policies relevant to the site. It identifies the key strategic issues relevant to the assessment and evaluation of the project. The development as proposed to be amended remains aligned with the Federal, State, district and local strategic plans and policies applying to the site, as summarised below:

### 4.6.1 National Housing Accord

The Federal Government announced the National Housing Accord in October 2022, committing to delivering 1.2 million houses in well-located areas over five years starting from July 2024.

The Accord aims to improve affordability by addressing Australia's housing supply challenges and enabling the delivery of more social and affordable housing.

The Housing Accord includes:

- An initial, aspirational national target of delivering a total of one million new, well-located homes over five years from 2024; and
- Immediate and longer-term actions for all parties to support the delivery of more affordable homes.

The proposal aligns with the National Housing Accord as it seeks to deliver a significant amount of additional high-amenity housing in an accessible location within the CoS.

The NSW Government has recently released five-year housing completion targets for 43 councils across Greater Sydney, Illawarra-Shoalhaven, Central Coast, Lower Hunter, and Greater Newcastle, as well as one target for Regional NSW.

These targets reflect NSW's commitment to deliver 377,000 new homes, including approximately 15,800 social and affordable dwellings, across the state by 2029 under the National Housing Accord. A five-year target of 18,900 new dwellings has been identified for the CoS LGA, the achievement of which will be supported by this proposal which will provide 177 market dwellings and 58 affordable dwellings.

### 4.6.2 Current and Draft Region Plans

#### 4.6.2.1 Greater Sydney Region Plan: A Metropolis of Three Cities

The Greater Sydney Region Plan (Regional Plan) is the overarching strategic plan that seeks to shape future development for the Sydney metropolitan area over the next 40 years. Under the Region Plan, the site is located within the Eastern Harbour City.

The project is consistent with the Regional Plan for these reasons:

- **Mixed-Use Development and Housing Supply:** The proposal's plan to introduce residential, commercial, and retail uses in Woolloomooloo aligns with the strategic plan's objective to increase housing supply and create diverse, vibrant centres. The inclusion of 15% affordable housing supports the strategic plan's goal of improving housing affordability.
- **Heritage Conservation:** The proposal's commitment to celebrating the heritage context of the site and its alignment with the general surrounding context of Woolloomooloo aligns with the strategic plan's objective to conserve and enhance environmental heritage, ensuring that new developments respect and integrate with the historical and cultural fabric of the area.
- **Public Domain and Connectivity:** The proposal's focus on creating a high-quality public domain with through-site links aligns with the strategic plan's vision of creating great places that bring people together, enhancing walkability and connectivity within the community.
- **Infrastructure and Collaboration:** The proposal's alignment with the Housing SEPP provisions for additional floor space and height supports the strategic plan's objective of aligning infrastructure with forecast growth, ensuring that new developments are supported by adequate infrastructure and services.

- **Sustainability and Liveability:** The proposal's integration of mixed-use development and public domain improvements aligns with the strategic plan's goals of enhancing liveability and sustainability, promoting a well-connected, vibrant, and resilient community.

### 4.6.3 Eastern City District Plan

The Eastern City District Plan is a 20-year plan to manage growth in the context of economic, social and environmental matters to implement the objectives of the Greater Sydney Region Plan.

The project is consistent with the Eastern City District Plan for these reasons:

- **Integration with Local Context:** The proposal's design, which acknowledges the terrace and warehouse style of existing developments, aligns with the strategic plan's emphasis on creating and renewing great places that respect the District's heritage and local character (Planning Priority E6).
- **Community Connectivity:** The introduction of several through-site links in the proposal supports the strategic plan's goal of fostering healthy, creative, culturally rich, and socially connected communities by improving walkability and accessibility (Planning Priority E4).
- **Sustainable Development:** The proposal's mixed-use nature, including residential, commercial, and retail uses, aligns with the strategic plan's objective of delivering integrated land use and transport planning to create a 30-minute city, reducing the need for long commutes and supporting local economies (Planning Priority E10).
- **Public Space Enhancement:** The focus on a high-quality public domain in the proposal aligns with the strategic plan's vision of delivering high-quality open space that enhances liveability and provides recreational opportunities for residents (Planning Priority E18).
- **Affordable Housing Commitment:** The proposal's inclusion of 15% affordable housing aligns with the strategic plan's objective of providing housing supply, choice, and affordability, ensuring that diverse housing needs are met within the community (Planning Priority E5).

### 4.6.4 City Plan 2036: Local Strategic Planning Statement (March 2020)

The Sydney Local Strategic Planning Statement (LSPS) is a 20-year plan and land use vision that seeks to appropriately develop jobs, homes, and infrastructure in conjunction with the identified priorities of the Sydney community.

The project is consistent with the LSPS for these reasons:

- **Support for Housing Diversity:** The inclusion of 15% affordable housing in the proposal aligns with the strategic plan's objective of providing a range of housing types and tenures to support a diverse community, including affordable housing (Planning Priority L3).
- **Promotion of Walkability:** The proposal's focus on through-site links and connectivity aligns with the strategic plan's vision of creating walkable neighbourhoods where daily needs can be met within a 5-10 minute walk, thereby reducing reliance on cars and promoting healthier lifestyles (Planning Priority I1).
- **Cultural and Heritage Integration:** The proposal's commitment to celebrating the heritage context of the site aligns with the strategic plan's focus on recognising and integrating cultural and heritage values into urban development. This approach supports the strategic plan's goal of creating a lively, cultural, and creative city that respects its historical roots (Planning Priority L1).
- **Environmental Sustainability and Urban Greening:** The proposal's design, which includes high-quality public spaces, aligns with the strategic plan's goal of increasing urban tree canopy cover and delivering Green Grid connections. This approach supports environmental sustainability by enhancing green spaces, improving air quality, and mitigating the urban heat island effect (Planning Priority S1).
- **Innovative and Inclusive Urban Design:** The proposal's consistency with the Housing SEPP and the Competitive Design Alternatives process aligns with the strategic plan's emphasis on innovative and inclusive urban design. This ensures that new developments are not only functional and aesthetically

pleasing but also accessible and inclusive for all community members, promoting social equity and cohesion (Planning Priority L2 and S2).

## 4.7 Statutory Context

This section of the report provides an overview of the key statutory requirements relevant to the site and the project, including:

- Environmental Planning and Assessment Act 1979 (EP&A Act),
- Environmental Planning and Assessment Regulation 2021 (the Regulations),
- NSW Biodiversity Act 2016 (BC Act),
- State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP),
- State Environmental Planning Policy (Transport and Infrastructure) 2021 (T&I SEPP),
- State Environmental Planning Policy (Resilience and Hazards) 2021 (R&H SEPP),
- State Environmental Planning Policy (Biodiversity and Conservation) 2021 (B&C SEPP),
- State Environmental Planning Policy (Sustainable Buildings) 2022 (SB SEPP),
- State Environmental Planning Policy (Housing) 2021 (Housing SEPP), and
- Sydney Local Environmental Plan 2012.

### 4.7.1 Statutory Requirements

Table 11 categorises and summarises the relevant requirements in accordance with the DPHI state Significant Development Guidelines. It identifies the key statutory matters which are addressed in detail within the EIS, including the power to grant consent, permissibility, other approvals, pre-conditions and mandatory considerations.

Table 11 Identification of Statutory requirements for the Project

Statutory Reference	Action
<b>Declaration of SSD</b>	Under Schedule 1(26A) of the Planning Systems SEPP, residential development with at least 10% affordable housing that has an Estimated Development Cost (EDC) of more than \$75 million is classified as SSD. The residential component of the proposed development has an estimated EDC of \$415,794,759. The proposal also proposes 15.1% GFA as affordable housing. As such the proposal is SSD.
<b>Permissibility</b>	The proposed development is classified as 'Mixed Use Development' which is permitted with consent in the MUI mixed use zone.
<b>Other Approvals</b>	
<b>Consistent Approvals S4.42 of the EP&amp;A Act 1979</b>	Act Applies
	Fisheries Management Act 1994 No
	Coal Mine Subsidence Compensation Act 2017 (s22) No
	Mining Act 1992 (380A) No

	Petroleum (Onshore) Act 1991 (s24A)	No
	Protection of the Environment Operations Act 1997 (s43)	No
	Roads Act 1993 (s138)	No
	Pipelines Act 1967	No
<b>EPBC Act</b>	The Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act) protects and manage nationally and internationally important flora, fauna, ecological communities, and heritage places. Bilateral Agreement 18 allows for the streamlining of environmental assessments and approvals between the Australian Government and the states and territories, ensuring both levels of government work together to protect Australia's unique environment while reducing duplication in the approval process.	
<b>Other Approvals</b>	<p>Biodiversity Conservation Act</p> <p>Clause 7.9 of the BC Act 2016 applies to SSD applications and requires SSD applications to be accompanied by a BDAR unless it is determined the proposal is not likely to have any significant impact on biodiversity values.</p> <p>Accordingly, a BDAR Waiver application was prepared, requesting the requirement to prepare a BDAR be waived, under clause 7.9(2) of the Biodiversity Conservation Act 2016.</p> <p>This request was received by the DPHI on 2 September 2025.</p>	
<b>Approvals That Do Not Apply</b>	<p>Fisheries Management Act 1994 – permit under s201, 205 or 219</p> <hr/> <p>Heritage Act 1977 – approval under part 4 or excavation permit under s139</p> <hr/> <p>National Parks and Wildlife Act 1974 – an Aboriginal Heritage Impact Permit, s90</p> <hr/> <p>Rural Fires Act 1997 – a bush fire safety authority under s100B</p> <hr/> <p>Water Management Act 2000 – a water use approval s89, water management work approval s90 or activity approval (other than an aquifer interference approval) s91.</p>	

## 4.7.2 Pre Conditions

Table 12 outlines the pre-conditions to exercising the power to grant approval which are relevant to the project and the section where these matters are addressed within this report.

Table 12 Pre-conditions

<b>Statutory Reference</b>	<b>Pre-Condition</b>	<b>Section in EIS</b>
<b>Resilience and Hazards SEPP – clause 4.6(1)</b>	<p>Potential sources of contamination exist at the site but subject to the recommendations and the Remedial Action Plan (<b>RAP</b>), the site can be made suitable for the proposed mixed-use development outcome.</p> <p>Under the SEPP a consent authority must be satisfied that the land is suitable in its contaminated state – or will be suitable, after remediation – for the purpose for which the development is proposed to be carried out.</p>	Section 6.2
<b>State Environmental Planning Policy (Transport and Infrastructure) 2021</b>	<p>Clause 2.119 relates to development with frontage to a classified road. The consent authority must not grant consent to development unless it is satisfied that where practicable and safe, vehicular access is provided by a road other than a classified road and that the safety, efficiency and ongoing operation of the classified road will not be adversely affected by the development. The site is accessed via Forbes Street.</p>	Section 6.1
	<p>Clause 2.120 relates to the impact of road noise or vibration on non-road development. The consent authority must be satisfied that appropriate measures will be taken to ensure that the relevant LAeq levels are not exceeded for development for the purposes of residential accommodation.</p> <p>The noise and vibration impact assessment confirmed that the residential component of the development is capable of achieving the relevant acoustic requirements, subject to mitigation measures and the inclusion of plenums, where required.</p>	Section 6.1
	<p>Clause 2.122 relates to traffic generating development and requires that before granting consent the consent authority must refer certain development for with access to any road to Transport for NSW.</p> <p>The proposed development is considered traffic generating development.</p>	Section 6.1
<b>State Environmental Planning Policy (Sustainable Buildings) 2022)</b>	<p>Chapter 2, Part 2.1(5) requires that development consent must not be granted for BASIX development unless the consent authority is satisfied that embodied emissions attributable to the development have been quantified. A BASIX certificate and NABERS has been prepared and submitted with the application.</p>	Section 6.1
<b>State Environmental Planning Policy (Housing) 2021</b>	<p>Section 15C provide that the in-fill affordable housing provisions of the Housing SEPP apply to development that includes residential development if –</p>	The proposed land uses are permitted with consent under the SLEP 2012.

	<ul style="list-style-type: none"> <li>▪ The development is permitted with consent under an EPI.</li> <li>▪ The affordable housing component is at least 10%.</li> <li>▪ The development is carried out in an accessible area.</li> </ul>	<p>At least 10% of the total GFA is proposed to be affordable housing.</p> <p>The site is approximately 500 metres from Kings Cross Station and meets the 'accessible area' threshold.</p>
	<p>Clause 20 Design Requirements requires that the consent authority consider whether the residential development is compatible with the desirable elements of the character of the area or for precincts undergoing transition, the desired future character of the precinct.</p>	<p>Section 6.2 of this report.</p>
	<p>Clause 21 Consent Authority must be satisfied that the affordable housing component will be maintained for at least 15 years and that it will be managed by a registered housing provider.</p>	<p>A letter from Bridge Housing has been prepared in support of the proposed development, including the operation of the affordable housing. Refer to Appendix G for further information.</p>
	<p>The minimum affordable housing component is 10%. 30% additional FSR is permitted for proposals delivering up to 15% affordable housing, based on the maximum permissible FSR for the land, in accordance with Section 16 (1) and (2). In accordance with Section 16 (3), the maximum building height for a building used for residential flat buildings or shop top housing is the maximum permissible building height for the land plus an additional building height that is the same percentage as the additional floor space ratio permitted under subsection (1).</p>	<p>15% of the total GFA proposed is provided as affordable housing (58 units). Therefore, the proposal seeks to utilise the 30% FSR bonus available.</p> <p>As the full 30% bonus FSR is permitted under Section 16 (1) and the development comprise residential development, a 30% height bonus is also applicable to the proposed development.</p>
	<p>Chapter 4 of the Housing SEPP provides non-discretionary development standards for residential apartment development.</p>	<p>Compliance with the requirements of the non-discretionary standards is provided at Appendix C.</p>
<p><b>Sydney Local Environmental Plan 2012</b></p>	<p>Objectives and land uses for MUI (Mixed Use) Zone</p> <ul style="list-style-type: none"> <li>▪ Part 4 – Principal development standards.</li> <li>▪ Part 5 – Miscellaneous provisions.</li> <li>▪ Part 6 – Additional Local Provisions</li> </ul>	<p>Appendix C</p>

### 4.7.3 Mandatory Considerations

Table 13 outlines the relevant mandatory considerations to exercising the power to grant approval and the section where these matters are addressed in the EIS.

Table 13 Mandatory Considerations

Statutory Reference	Mandatory Consideration	Section in EIS
<b>Consideration under the EP&amp;A Act and Regulation</b>		
<b>Section 1.3</b>	The relevant objects of the EP&A Act.	Appendix C
<b>Section 4.15 (1)(a)(i) Relevant Environmental Planning Instrument</b>	All relevant EPIs will be addressed in the EIS, these include; State Environmental Planning Policy (Planning Systems) 2021	Section 4.1
	State Environmental Planning Policy (Resilience and Hazards) 2021	Section 6.2
	State Environmental Planning Policy (Transport and Infrastructure) 2021	Section 6.1.9 & Appendix C
	State Environmental Planning Policy (Housing) 2021	Appendix C
	State Environmental Planning Policy (Sustainable Buildings) 2022	Section 6.1.9 & Appendix C
	Sydney LEP 2012	Appendix C
<b>Section 4.15 (1)(a) (iii) Relevant Development Control Plan</b>	Clause 2.10 of the Planning Systems SEPP provides that DCPs do not apply to SSDAs. As such, compliance with the Sydney DCP 2022 is not a mandatory consideration.	N/A
<b>Section 4.15 (1)(a) (iiia) Any Planning Agreement or Draft Planning Agreement</b>	A Voluntary Planning Agreement for the site already exists and has been executed. The existing VPA will be amended to reflect the future consent for SSDA.	Section 2.3
<b>Section 4.15(1) (b) The Likely Impacts of That Development</b>	The likely impacts of the development including environmental impacts on both the natural and built environments, and social and economic impacts in the locality have been considered.	Section 7 and Section 6 of this report.
<b>Section 4.15(1)(c)</b>	The suitability of the site for the development.	Section 7
<b>Section 4.15(1)(d)</b>	Any submissions made in accordance with the Act or regulations	Section 7
<b>Section 4.15(1)(2)</b>	The Public Interest	Section 7
<b>Section 4.24</b>	Division 4.4 of the Planning Act pertains to the status of concept development applications and associated consents. Any subsequent development application relating to the site must not be inconsistent with the consent granted for the concept proposal. Accordingly, the concept development application will be surrendered.	Section 1.2.1
<b>Mandatory Relevant Considerations Under EPIs</b>		

<b>State Environmental Planning Policy (Resilience and Hazards) 2021</b>	Section 4.6 – Contamination and remediation to be considered in determining development applications.	Appendix C
<b>State Environmental Planning Policy (Transport and Infrastructure) 2021</b>	Section 2.119 – Development with frontage to a classified road. S Section 2.120 – Impact of road noise or vibration on non-road development Section 2.122 – Traffic-generating development.	Appendix C
<b>State Environmental Planning Policy (Sustainable Buildings) 2022)</b>	Section 2.1 – Standards for BASIX development and BASIX optional development.	Appendix C
<b>State Environmental Planning Policy (Housing) 2021</b>	Chapter 2, Part 2, Division 1 – In-fill affordable housing Chapter 4 - Design of residential apartment development.	Appendix C
<b>Sydney Local Environmental Plan</b>	Objectives and land use for B4 Mixed Use zone Part 4 – Principal development standards Part 5 – Miscellaneous provisions Part 6 – Local provisions – height and floor space Part 7 – Local provisions – general	Appendix C
<b>Development Control Plan</b>		
<b>Sydney Development Control Plan 2012</b>	Clause 2.10(1) of the Planning Systems SEPP provides that the provisions of Development Control Plans do not apply to SSD. Clause 2.10(2) of the Planning Systems SEPP provides that a requirement of an EPI that a DCP be prepared before development consent can be granted to development does not apply to SSD. Whilst a Concept DA has been prepared for the site, consistent with the requirements under the SLEP 2012, it is proposed that this Concept DA be surrendered in accordance with the relevant consent conditions.	N/A
<b>Development Contribution</b>		
<b>Planning Agreement</b>	The concept DA was subject to a VPA (VPA/2023/2) which has been executed and registered on title. The terms of the planning agreement were negotiated and agreed by William Street Residential Pty Ltd, Gwynvill Trading Pty Ltd, Kenmure Holdings Pty Ltd and The Council of the CoS in March 2024. The VPA requires and the construction of a 7m wide pedestrian laneway to Council satisfaction and the transfer of that land to Council, free of cost. The Planning Agreement does not exclude the application of Section 7.11, 7.12 or 7.24 of the Act to the development. As such, a contribution payment under the CoS Council Development Contributions Plan 2015 should be required to	Section 2.3

be calculated based on the proposed SSDA, prior to the issue of the relevant construction certificate.

**Affordable Housing**

Clause 7.13(2C) of the SLEP 2012, provides that the consent authority may, when granting development consent, impose a condition requiring an affordable housing contribution equivalent to the following:

(a) for development applications lodged on or after 1 July 2022—

(i) 3% of the total floor area of the development that is intended to be used for residential purposes, and

(ii) 1% of the total floor area of the development that is not intended to be used for residential purposes.

This clause may be satisfied by a monetary contribution paid to the CoS Council in accordance with the City of Sydney Affordable Housing Program or a dedication in favour of CoS Council, comprising 1 or more dwellings with a gross floor area of at least 35sqm and no more than 90sqm each.

The consent authority may impose a condition of consent requiring the dedication or payment of monetary equivalent to CoS Council, in accordance with the contributions scheme.

**CoS Development Contributions Plan 2015**

The CoS Development Contributions Plan (2015) applies to areas in the CoS LGA outside of Central Sydney, which includes the site. The site is located in the East Precinct of Sydney. The Contributions Plan details the following contribution rates for the East Precinct:

Rate		Amount
Per additional worker		\$2,544
Per additional visitor		\$6,251
		\$9,218
Per additional resident	Per 1 bed dwelling (assumes 1.3 residents)	\$11,984
	Per 2 bed dwelling (Assumes 1.9 residents)	\$17,515
	Per 3+ bed dwelling (assumes 2.7 residents)	\$20,000

Standard Conditions of Consent will be included requiring the payment of conditions.

**HPC (Regional) Development Contributions**

The Environmental Planning and Assessment Amendment (Housing and Productivity Contributions) Bill 2023 was introduced on 13 July 2023, which changed how contributions for regional infrastructure are levied, by establishing a Housing and Productivity Contribution (HPC). Regional infrastructure includes public amenities or public services,

affordable housing, transport infrastructure, regional or State roads and measures to conserve or enhance the natural environment.

The contribution rate for medium or high-density residential development in the Greater Sydney Region is currently \$10,000 per dwelling (+ CPI). The contribution rate for commercial/ retail land uses is \$30 per square metre of new GFA.

Approximately 5,445sqm of commercial GFA exists on the site. Under this SSDA, 1,743sqm retail GFA is proposed. Therefore, the proposal generates a reduction of 3,702sqm of commercial floor space on the site. Affordable housing provided by or on behalf of a social housing provider is exempt from the HPC regime. Additionally, affordable housing that is required by conditions of development consent to be managed by a registered community housing provider is also exempt from the HPC regime.

# 5 Assessment of Key Impacts

This section provides an updated justification and evaluation of the project as a whole.

## 5.1 Design Quality

Clause 6.21C of the SLEP and the SEARs require the proposal to demonstrate design excellence. A competitive design process was undertaken for the original concept development application on the site, and a bridging design integrity process was undertaken in collaboration with the DIP and the Government Architect NSW for this SSDA.

Two DIP sessions were held prior to lodgement of the SSDA, and a third session was held on 11 March 2026 following the public exhibition of the project. The summary letter was issued to the DIP in advance of the meeting which provided a summary of the key community concerns, a summary of amendments and a summary schedule of the projects compliance against ADG criteria and broader planning matters. This was provided alongside the amended architectural plans.

In relation to DIP session 1 and 2, all matters have been addressed as part of the lodgement of the application. The only unresolved matter from DIP session 2 was in relation to the thermal comfort of the penthouse apartments along the William Street. This was raised at DIP 3 and has since been addressed as part of the project refinements. The south facing penthouse apartments now include juliette style balconies to address this issue.

There remains no outstanding issues from DIP 1 and DIP 2.

The DIP comments, provided as part of the DIP 3 Letter at **Appendix W**, have been responded to as part of the RtS as follows:

Table 14 DIP 3 Items and Project Response

DIP Issue	Project Response
<p><b>Building Massing</b></p> <p>The Panel acknowledged that the built form and massing demonstrate a considered response to the site context, particularly the redistribution of height to the William Street East tower and its consistency with surrounding tall forms, while noting that external amenity impacts have been carefully addressed.</p>	<p>The DIP supports the proposed amendments to the building envelope.</p> <p>Details of the revised built form and massing, as presented to the DIP, are outlined in Section 3.2.3.</p>
<p><b>William Street Building Façade</b></p> <p>The Panel considers that elements of the William Street façade, including blades and curved forms, are no longer necessary and are limiting window and balcony openness, reducing internal amenity and creating inefficient apartment layouts. They recommend simplifying the façade and reducing solid elements and blades, noting that privacy impacts are already addressed by the surrounding buildings and that targeted refinements would improve daylight, outlook and overall amenity for north-facing apartments.</p>	<p>In response to the DIP's comments on the William Street building façade, FJC Studio has refined the design to:</p> <ul style="list-style-type: none"> <li>✔ simplify the northern and western elevations of the William Street façade by removing external blades and curved elements that are no longer required to address privacy interfaces with the Forbes Street and Dowling Street buildings;</li> <li>✔ reconfigure apartment layouts following the removal of angled façade elements, resulting in more efficient room proportions and improved daylight access, outlook and natural ventilation for north-facing apartments; and</li> </ul>
<p><b>Dowling Street Building Façade and Layout Design</b></p> <p>The Panel recommended that the Dowling Street building re-instate a more orthogonal balcony and glazing line, similar to the original design, to allow for a 6-seater table on the balcony and more usable internal spaces.</p>	<p>Tribe Studio has redesigned the north-facing balconies within the Dowling Street building to a more regular rectangular form, improving usability and enhancing internal amenity outcomes.</p>

### **Apartment Layout and Amenity**

The Panel raised concerns about apartment layouts in the William Street building, noting that angled façade blades have led to inefficient room shapes, poor daylight and reduced usability, and recommended refining layouts to prioritise functional planning, light and ventilation. They also found that angled balconies in the Dowling Street building reduce amenity compared to the earlier scheme, recommending a return to a more orthogonal balcony and glazing line, while also ensuring safe access for rooftop planting maintenance.

As identified in Section 3.2.7, FJC Studio and Tribe Studio have revised the apartment layouts of both the William Street and Dowling Street buildings to provide a simplified and standardised outcome.

### **Affordable Housing Amenity**

The Panel supported consolidating the affordable housing apartments into a single stack but raised concerns about the current lift lobby, noting that its location and design lack visibility, presence and equity compared with market entries, and recommended relocating it to the William Street frontage. While acknowledging improved solar access, the Panel was concerned about reduced cross-ventilation, recommending further investigation into apartment distribution, façade performance and ventilation to improve overall amenity.

As identified in Section 3.2.1 and 3.2.2, the affordable housing amenity has been improved in the revised scheme in response to the DIPs comments. The as lodged solar access was 60%. This has now been improved to 66%.

We note that at DIP 2, the DIP confirmed that anything less than 60% solar access was unacceptable. The project team has made significant refinements to increase the degree of solar access, and the proposed outcome is considered equitable and reasonable and complies with the comments of DIP 2. Given the affordable housing stack has been specifically designed to have their own address and form a separate stratum, it is not practical to relocate individual dwellings or salt and pepper affordable housing, especially given that the project has achieved greater than 60% solar access. The proposed design satisfies the comments made through DIP 2.

In regards to the cross ventilation, the DIP noted that, through façade refinements there is likely a higher degree of ventilation that is capable of being achieved due to the windy environment at that particular location.

FJC met with RWDI to explore this further. As per **Appendix X**, RWDI has reviewed the cross ventilation, with a particular focus on the affordable housing apartments. As part of the refinements undertaken to the façade and apartment layout, two additional apartments per floor now achieve cross-ventilation. The façade refinements in conjunction with the further wind investigations confirm that the cross ventilation has been increased to 50%.

In response to the DIP's comments regarding the amenity of the residential address, refinements have been made so that the lobby and access for the affordable housing lobby mirrors that of the market housing lobby.

### **Access to the DDA Lift, escalator and Central Core in the William Street Building**

While the Panel supports 24-hour site access, they raised CPTED concerns about the visibility and layout of the DDA lift, amenities and access paths, recommending the design be revised to provide more direct, legible and visible connections to reduce potential safety risks.

The DDA lift has been relocated to address concerns raised by the Panel. See Section 4.8 for further details.

### **Thermal Comfort for Upper Levels of William Street Buildings**

The Panel remains concerned about poor thermal comfort in the south-facing William Street penthouse apartments due to extensive glazing and afternoon

The thermal comfort for the upper level apartments along William Street has been improved through the addition of Juliette balconies, as suggested by the DIP. Refer to the Response to Submissions Design Report at **Appendix F** for further details.

sun exposure, and recommends refining the façade to reduce reliance on artificial cooling and improve overall performance and occupant control. This closes out the comments raised in DIP 1 and DIP 2.

#### **Forbes Street Building Façade**

The Panel identified opportunities to improve the Forbes Street façade at street level to better contribute to visual interest and public domain amenity.

The design of the western façade of the Forbes Street building has been refined to provide greater visual interest in its interface with the public domain. See Section 4.5.9 of this report for further detail.

The DIP remains satisfied that the project is capable of achieving design excellence and advised that no further Panel review is required, subject to the incorporation of the recommended refinements prior to lodgement of the RtS Report.

## **5.2 Future Character of Surrounds**

As noted by the DIP, the proposed development sits comfortably within the existing urban environment, which is characterised by ***“a varied topography from which tall tower forms emerge. The panel expressed that the redistribution of height into the William Street East tower was contextually appropriate and consistent with tall tower forms in the surrounding context, and that the proposal continues to present a skilful design response.”***

The potential future character, established by planning forms and active SSDA's will only further emphasise that the project is contextually appropriate and consistent with the surrounding context.

The below image demonstrates the likely future surrounding context, and how the massing and scale of the proposed development continues to fit within this future context. The RTS Design Report at **Appendix F** outlines the methodology of identifying this future character.

This includes:

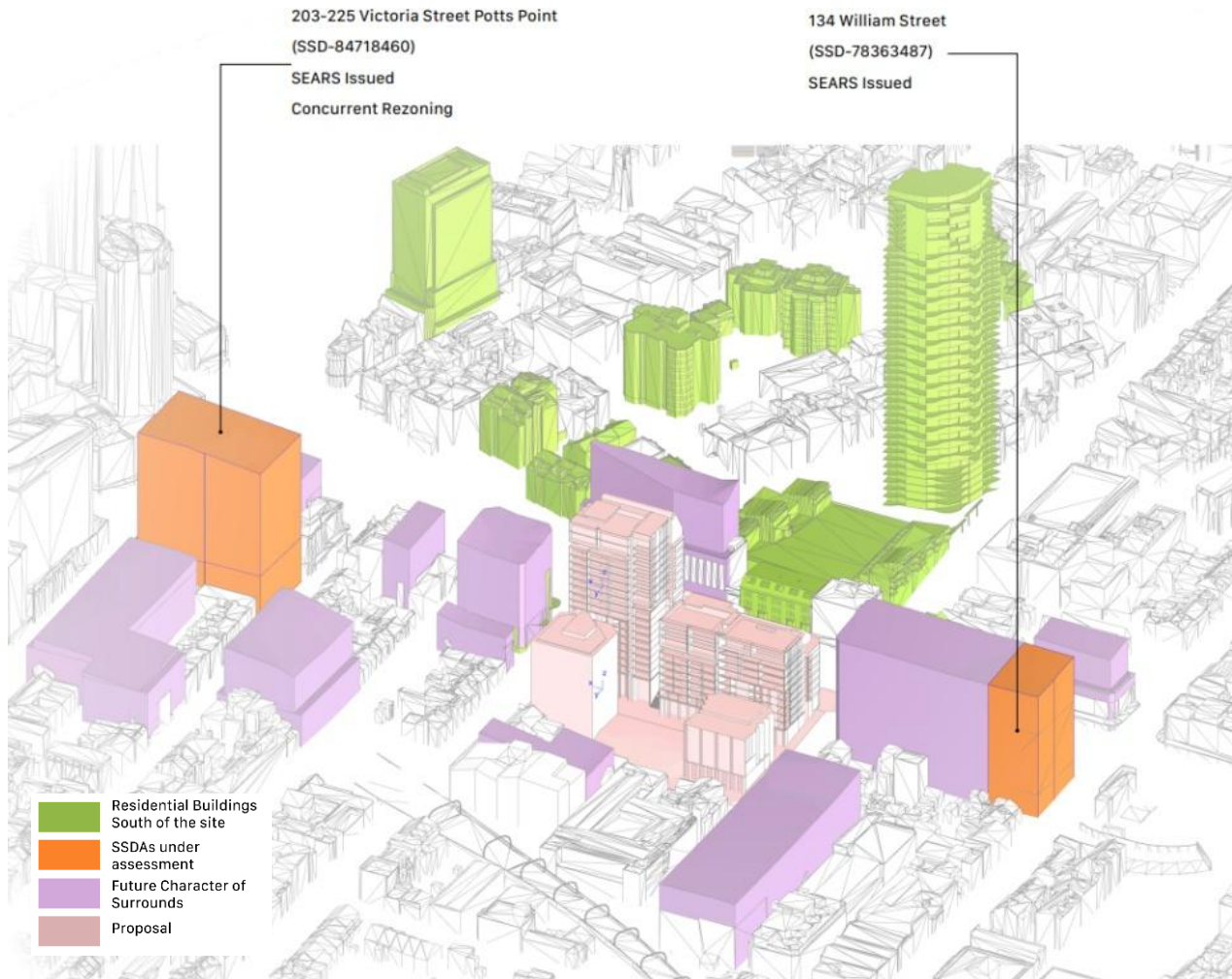
- Existing residential flat buildings and tall towers established to the south of the site. This is shown in green. It is noted that, aside from the properties along William Street, the residential area to the south of Premier Lane is zoned R1 General Residential and therefore the tall towers exceed what would be available under the planning controls and any bonus provisions. It is therefore unlikely that they would be developed to a greater extent.
- Identification of sites that could potentially developed under the 30% uplift under the Housing SEPP. These are shown in blue below.
- Current active SSDA's that are being progressed through the infill pathway or HDA pathway.

Active SSDA's includes:

- 134 Williams Street, Woolloomooloo (SSD-78363487)
  - SEARs issued
- 203-225 Victoria Street, Potts Point (SSD-84718460)
  - HDA pathway with concurrent rezoning – SEARs issued

The diagram below has excluded those items which are identified heritage items.

Figure 14 Future Character of Surrounds



Source: FJC

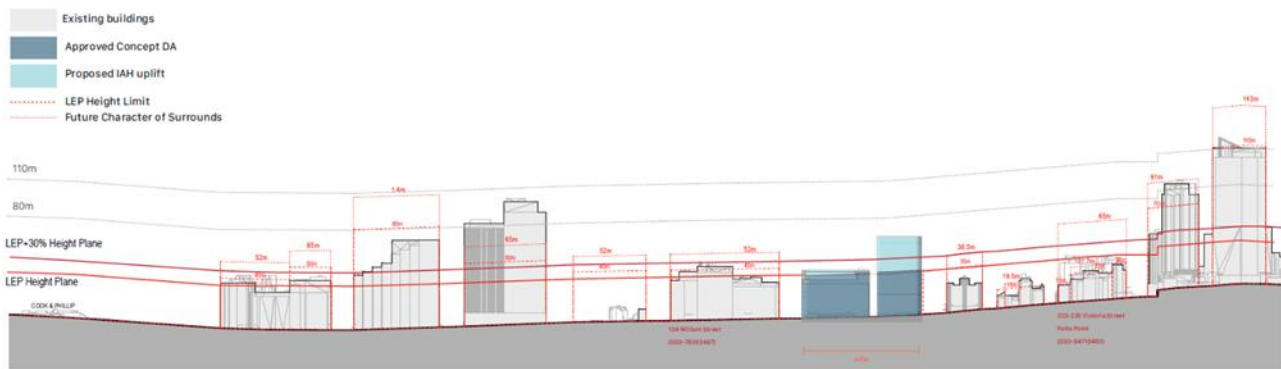
The site is a prominent site located along the William Street spine, a key collector connecting Kings Cross to the CBD. The locality statement for William Street states that taller buildings should be located along the northern side of William Street, of which the development includes. As evident above, there is currently three active projects along this northern side of William Street which include tall tower forms.

The proposed development therefore sits comfortably with the future scale of development. It has been designed to respond to the nearby heritage character by scaling its massing down towards the northern end of the site where future development would be faced with heritage constraints.

The play in building height across the individual buildings is reflective of both the existing and emerging character, where there is not a single consistent height but rather a mix of different building typologies, scale, form and heights reflective of the areas history and evolving future as a “high quality commercial spine.”

The proposed massing and scale suitably fits within the existing and emerging future surrounding as outlined above and illustrated in the below image of the future William Street spine.

Figure 15 William Street long section



Source: FJC

## 5.3 Visual Impact Assessment

Upon lodgement of the SSDA, Urbaine had prepared a Visual Impact Assessment Report which assessed 8 properties, including:

- 96–200 William Street, Woolloomooloo;
- 169 William Street, Darlinghurst;
- 177–185 William Street, Darlinghurst;
- 191–205 William Street, Darlinghurst;
- 1 Farrell Avenue, Darlinghurst;
- 3 Farrell Avenue, Darlinghurst;
- 2–4 Farrell Avenue, Darlinghurst; and
- 6–8 Farrell Avenue, Darlinghurst

A total of 70 view points were assessed using a range of photos from private view inspections and where that was not practical, verified drone imagery was used to supplement the private views.

The report was prepared in accordance with the tenacity principles and to address the SEARs.

In response to community concerns around the submitted VIA and to address the DPHI's key issues in relation to the view impacts, the project team engaged a new VIA consultant to respond specifically to the concerns raised by the DPHI. The Urbis VIA (Appendix H) builds on the Tenacity assessment and VIA undertaken by Urbaine.

Urbis undertook a review of all public submissions to identify those which raised concerns around view impacts, which equated to a total of 96 public submissions. A high-level desktop assessment was then undertaken of dwellings raised by these submissions that were not previously assessed or were assessed by extrapolation. This included dwellings within the residential flat buildings at Rosebank Street, Kirketon Road, Tewkesbury Avenue, Forbes Street and Victoria Street. Low to medium risk of view loss was identified across these buildings for the mid to upper level, north facing dwellings.

The Urbis VIA reviewed all previously submitted visual impact and view sharing material and prepared a table break-down of the view location and view affectation. Of these 65 views reassessed, it was found that 14 were affected relative to the central massing, and 51 were unaffected. 5 viewpoints that were assessed in the Urbaine VIA were not reassessed as these were either public domain views or not included in the report. Views were categorised into the following groups with their locations identified in **Figure 11**:

- Views selected for re-modelling (6),
- Views affected by central massing but not selected for re-modelling (9), and
- Views unaffected by central massing but subject to view loss of scenic merit including icons, due to previously submitted eastern tower form (10).

Figure 16 Identification of Views Previously Assessed, Not Assessed, and Extent of Potential View Loss



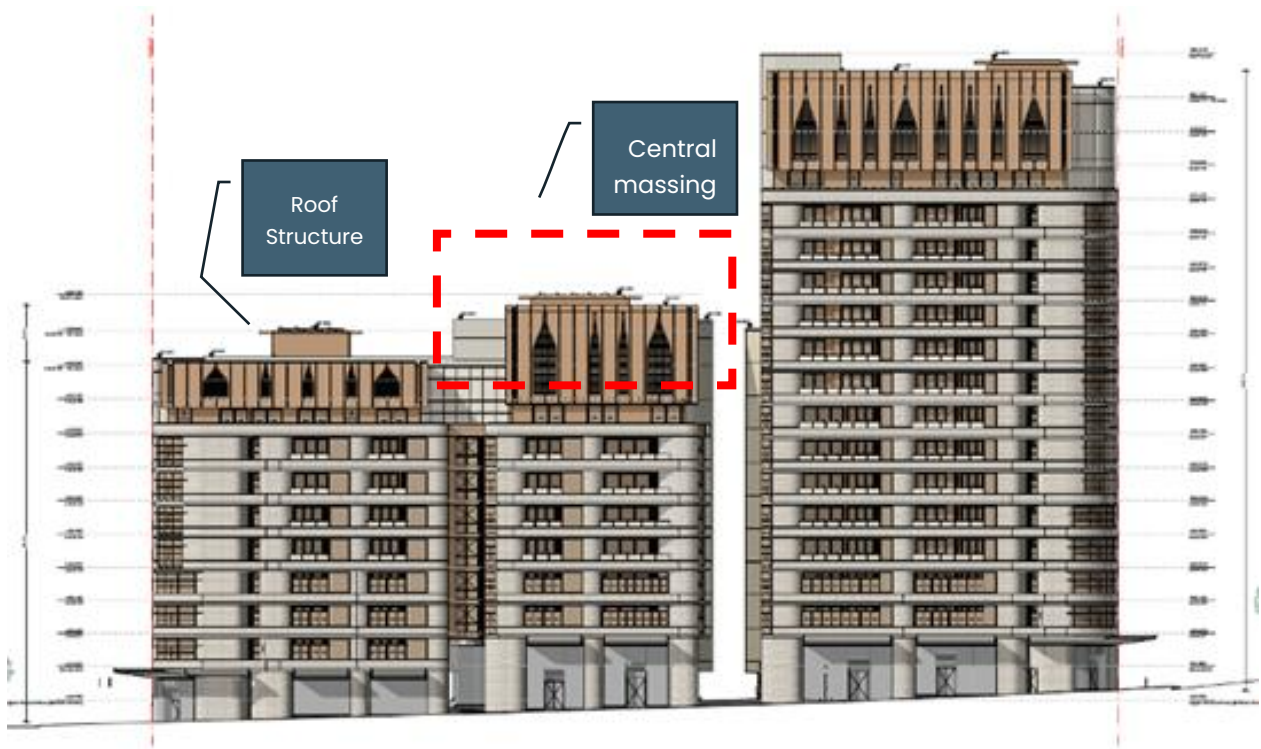
Source: Urbis VIA

For reference, the below illustrates the as lodged southern elevation and the amended south elevation, identifying the what is referred to as the central massing.

The elevation also demonstrates that, as part of this amendment, the roof top features within the south western portion of the building have since been removed and replaced with a glass balustrade which provides for unobstructed views, and extends to a maximum of 1.8m above the apex of the roof.

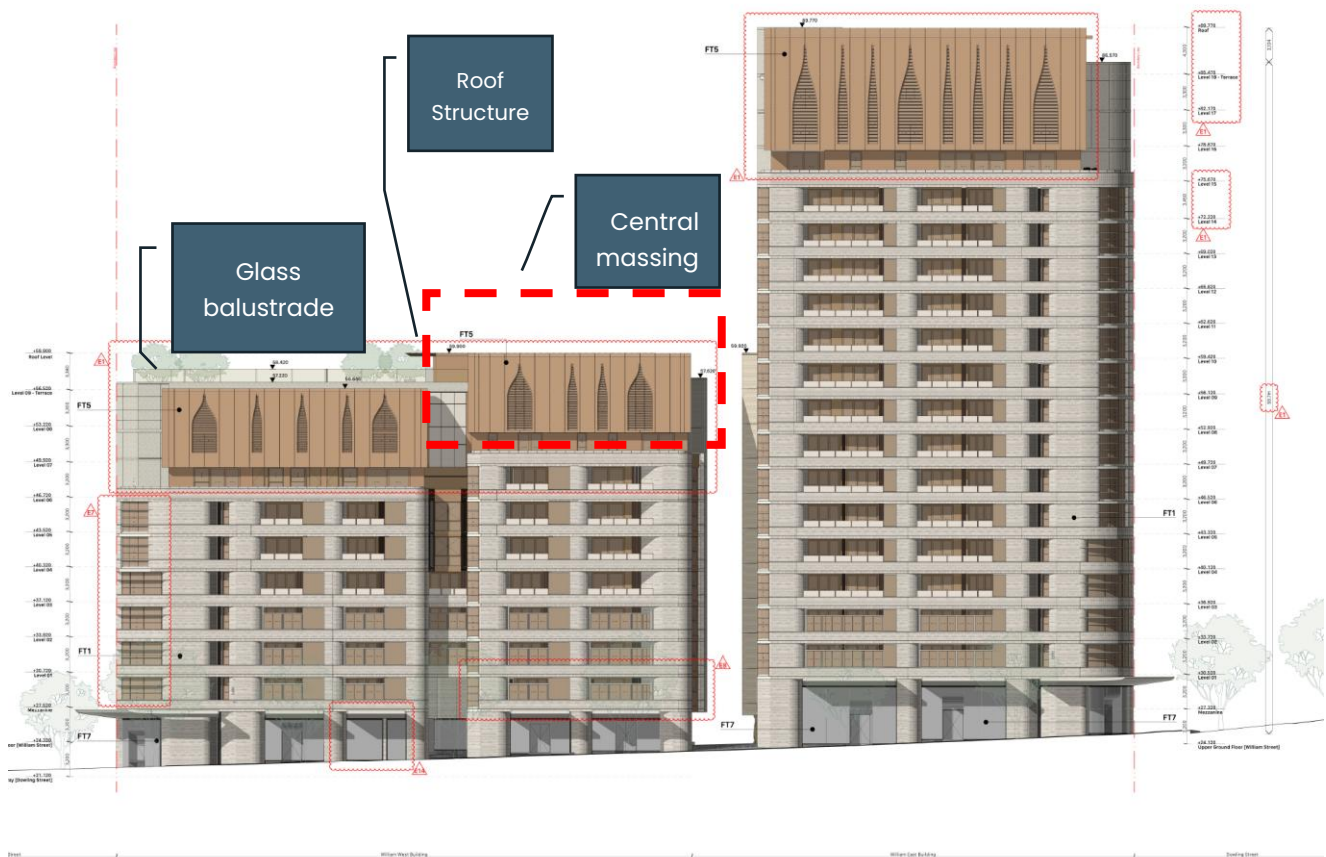
The roof top features that were originally visible and sat 1m above the central massing have also been removed and this central massing has been reduced in height from RL63.1 to RL59.9.

Figure 17 Lodged William St Elevation



Source: FJC

Figure 18 Amended William St Elevation



Source: FJC

The findings of the reassessed views identified that the central massing affects views to iconic elements for seven (7) dwellings, all within 5-15 Farrell Avenue. Subsequently, six representative views have been re-modelled to test impacts of the central massing and rooftop elements which were not considered in the previous assessment. It is noted that View 16 has not been re-modelled because it is already compromised as a result of the approved development, and the proposal does not represent any additional impact. Remodelling of this view would not provide any further information than what is demonstrated in the remodelled view *Urbis VP 05* located directly above.

It is also noted that the central massing has been reduced in height by 3.2m since the lodgement of the proposal and the rooftop elements that were located on the southwestern portion of the building have also since been removed, to promote view sharing. These two refinements have impacted the revised view outcomes as discussed below. The assessment applies the Tenacity principles established in *Tenacity Consulting v Warringal Council (2004)* and is outlined in **Table 9** below:

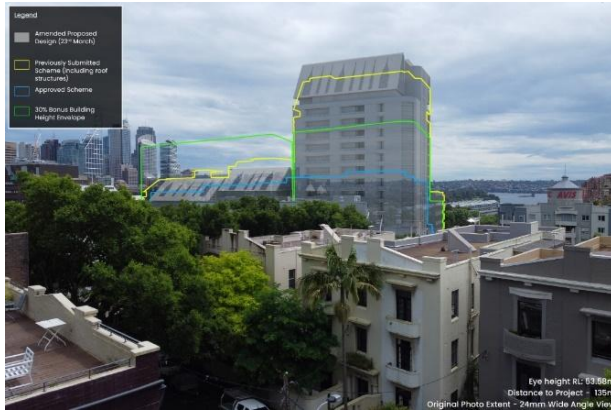
Table 15 Re-Modelled View Assessment

View	Description of view impact	Tenacity Rating
PM 01 Level 4, 5- 15 Farrell Avenue – Northern Tower	The central massing above the concept approval blocks the arch and southern pylon of the Sydney Harbour Bridge. It also blocks the lower section of the Sydney Harbour Bridge and parts of the Royal Botanic Gardens. The William Street East tower blocks open sky at this level. The additional height sought above the approved concept envelope results in view loss to icons within unique settings.	<b>Lodged Scheme Rating:</b>  Severe  <b>Amended Scheme Rating:</b>

It is noted that the majority of the central and western massing sites within the permissible controls. It is also noted that the approved concept DA involves the loss of the Sydney Opera House.

Moderate

The reduction of 3.2m at the central massing has not resulting in any improvement to iconic or scenic views at this level. This apartment is at a relatively low level of the apartment building and protection of these views would result in a compromised development outcome given the low level nature of this apartment.



**PM 02  
Level 5, 5-  
15 Farrell  
Avenue –  
Northern  
Tower**

Similarly, the central massing above the concept approval blocks the arch and southern pylon of the Sydney Harbour Bridge. It also blocks the lower section of the Sydney Harbour Bridge and parts of the Royal Botanic Gardens. The William Street East tower blocks open sky at this level. The additional height sought above the approved concept envelope results in view loss to icons within unique settings.

**Lodged  
Scheme  
Rating:**

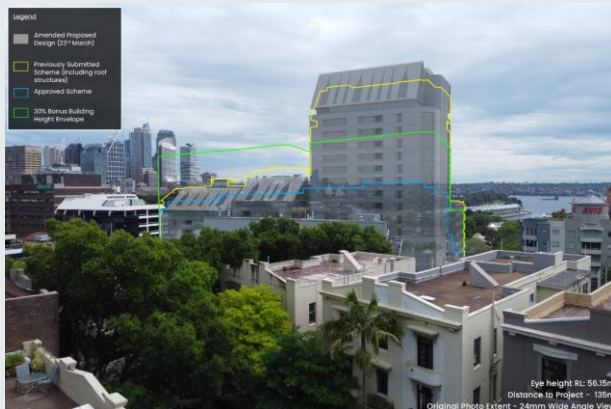
Severe

It is noted that the majority of the central and western massing sites within the permissible controls. It is also noted that the approved concept DA involves the loss of the Sydney Opera House.

**Amended  
Scheme  
Rating:**

Moderate

The reduction of 3.2m at the central massing has resulted in a very small portion of the Harbour Bridge being visible.



**PM 03  
Level 6, 5-  
15 Farrell  
Avenue –  
Northern  
Tower**

The tower blocks all of the Sydney Opera House and a section of land water interface within Sydney Harbour.

**Lodged  
Scheme  
Rating:**

Severe

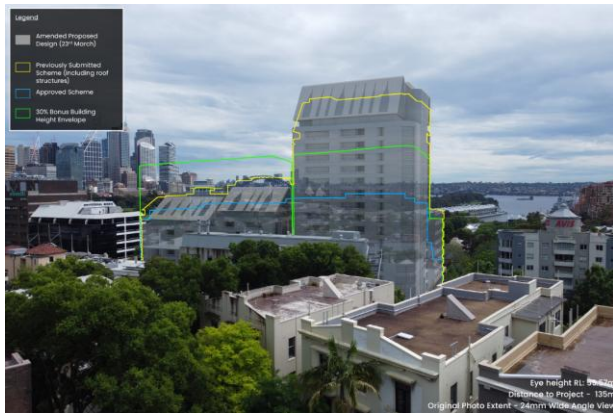
Scenic compositions with land water interfaces including Fort Denison and Woolloomooloo Bay are retained to the North.

It is noted that the majority of the central and western massing sites within the permissible controls.

**Amended  
Scheme  
Rating:**

The reduction of 3.2m at the central massing has resulted in improved views to the Harbour Bridge, with only a small portion of the lower section of the bridge and the northern pylon being blocked.

Moderate-severe



**PM 04  
Level 7, 5-  
15 Farrell  
Avenue –  
Northern  
Tower**

Similarly, The tower above the approved envelope blocks all of the Sydney Opera House and a section of land water interface within Sydney Harbour.

Scenic compositions with land water interfaces including Fort Denison and Woolloomooloo Bay are retained to the North.

It is noted that the majority of the central and western massing sites within the permissible controls.

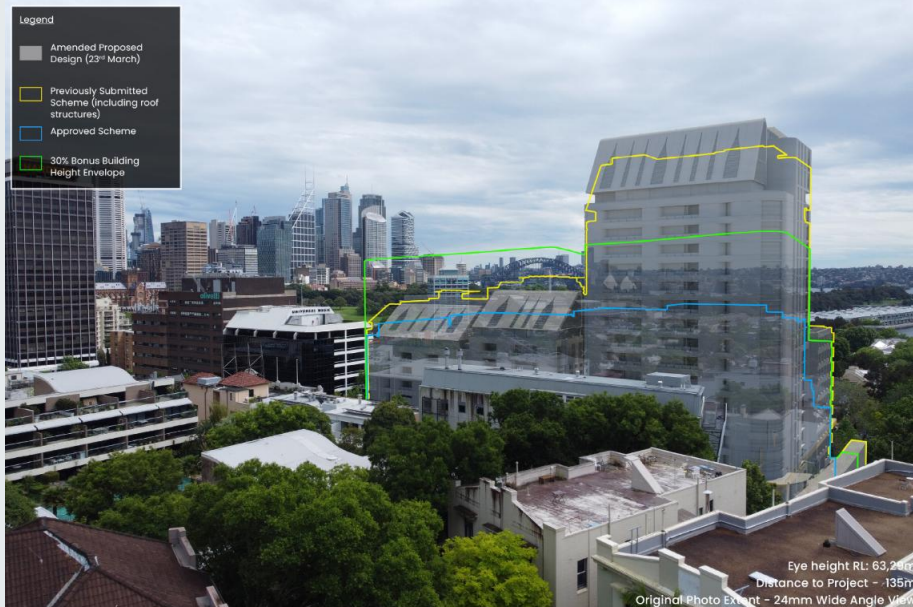
The reduction of 3.2m at the central massing uncovers a portion of the view to the Harbour Bridge that was previously blocked by the central massing.

**Lodged  
Scheme  
Rating:**

Severe

**Amended  
Scheme  
Rating:**

Moderate-  
severe



**VP 05  
Level 4, 5-  
15 Farrell  
Avenue –  
Southern  
Tower**

The proposed view includes the roof form and additional structures above the approved concept envelope, which block the Sydney Opera House at this level. This also blocks some land and water interface.

Some scenic compositions, such as the land water interfaces at Fort Denison and Woolloomooloo Bay, are retained.

It is noted that the majority of the central and western massing sites within the permissible controls.

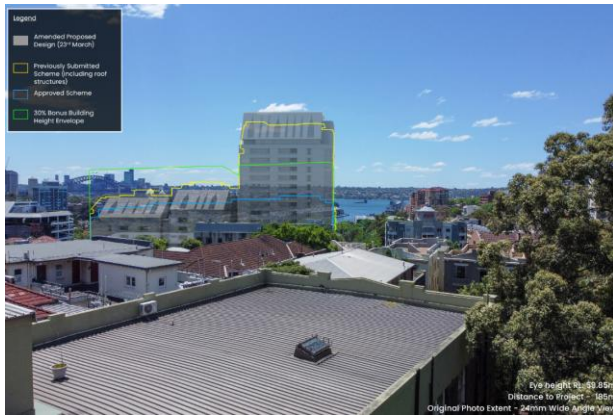
The reduction of 3.2m at the central massing uncovers a portion of the Opera House that was previously blocked by the roof top shade structures.

**Lodged  
Scheme  
Rating:**

Moderate

**Amended  
Scheme  
Rating:**

Moderate



**VP 06  
Level 6, 5-  
15 Farrell  
Avenue –  
Southern  
Tower**

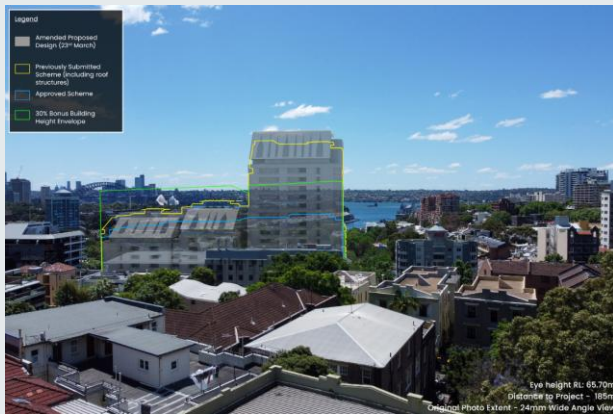
The Sydney Opera House within its harbour setting is retained for level 6. There is also no view loss to the Harbour Bride.

Some scenic compositions, such as the land water interfaces at Fort Denison and Woolloomooloo Bay, are retained.

The reduction in the central massing by 3.2m uncovers some areas of the land water interface that were previously blocked.

**Lodged  
Scheme  
Rating:**  
Moderate

**Amended  
Scheme  
Rating:**  
Minor-  
moderate



The photomontages included in the assessment of the six views above consider the proposed development in comparison with the approved concept envelope and the 30% blanket uplift scheme. It demonstrates that the proposed massing achieves a better view outcome when compared to the blanket 30% uplift for all views assessed. This is also evident in the Urbaine report, where the alternative envelope results in widespread improvements to view sharing when compared to the 30% uplift scenario. In all images modelled across the Urbaine VIA Report and within the Urbis VIA RtS Report, it is evident that the additional mass added to the William Street east tower (above the 30% uplift envelope), results in sky view loss only and does not result in loss of views to icons. Any additional mass located within the southeast and central portions of the William Street building have the potential to result in loss of views to Harbour Bridge, Opera House and land water interface, which is of greater value than sky views. On this basis, the relocation of the central mass to the tower as part of the amendments to the proposal has result in improved view outcomes as it results in improved Harbour Bridge views for 2 apartments and views to the Opera House Sails for an additional 2 apartments.

Overall, the proposal has been amended to reduce the height of the central massing by approximately 3.2 metres, while incorporating necessary roof elements. Comparative modelling demonstrates that the amended scheme performs more favourably than the previously submitted design when assessed against the 30% blanket uplift scheme. While the amended design does not eliminate view impacts, it reduces impacts associated with the central massing.

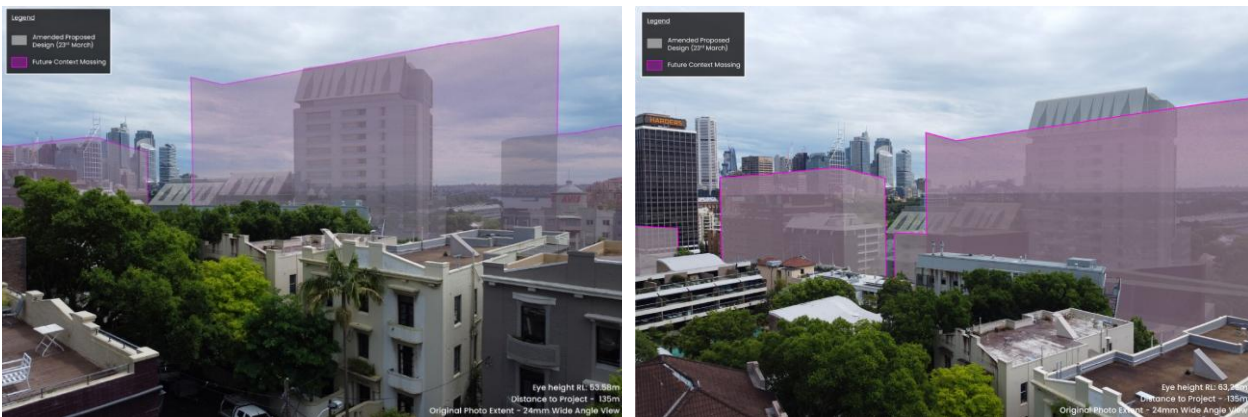
**Future visual context**

The RTS Visual Impact Assessment considers this future character in its visual modelling to demonstrate the likely future view impact of future permissible building envelopes.

The permissible building envelopes shown in the RtS VIA are taken from the future context modelling completed by FJC and relate to those buildings along the northern side of William Street as well as the building directly south of the site.

As demonstrated by Figure 19, any development to the south is likely result in view loss impacts to the northern tower of the Palisades at 5-15 Farrell Avenue. The southern tower should retain views through the site however land and water interface would likely be blocked. The potential building envelope to the east and west of the site, along William Street, will also potentially result in view loss impacts to those apartments further south of the site, particular those within the lower levels. The potential building envelope available to those properties to the east and west, is illustrated in pink below in Figure 11.

Figure 19 Future Character View Assessment – Level 4 (left) and Level 7 (right), northern tower – 5-15 Farrell Avenue



Source: Urbis VIA

Figure 20 Future Character View Assessment – Level 4 (left) and Level 6 (right), southern tower – 5-15 Farrell Avenue



Source: Urbis VIA

## 5.4 Overshadowing and Solar Access

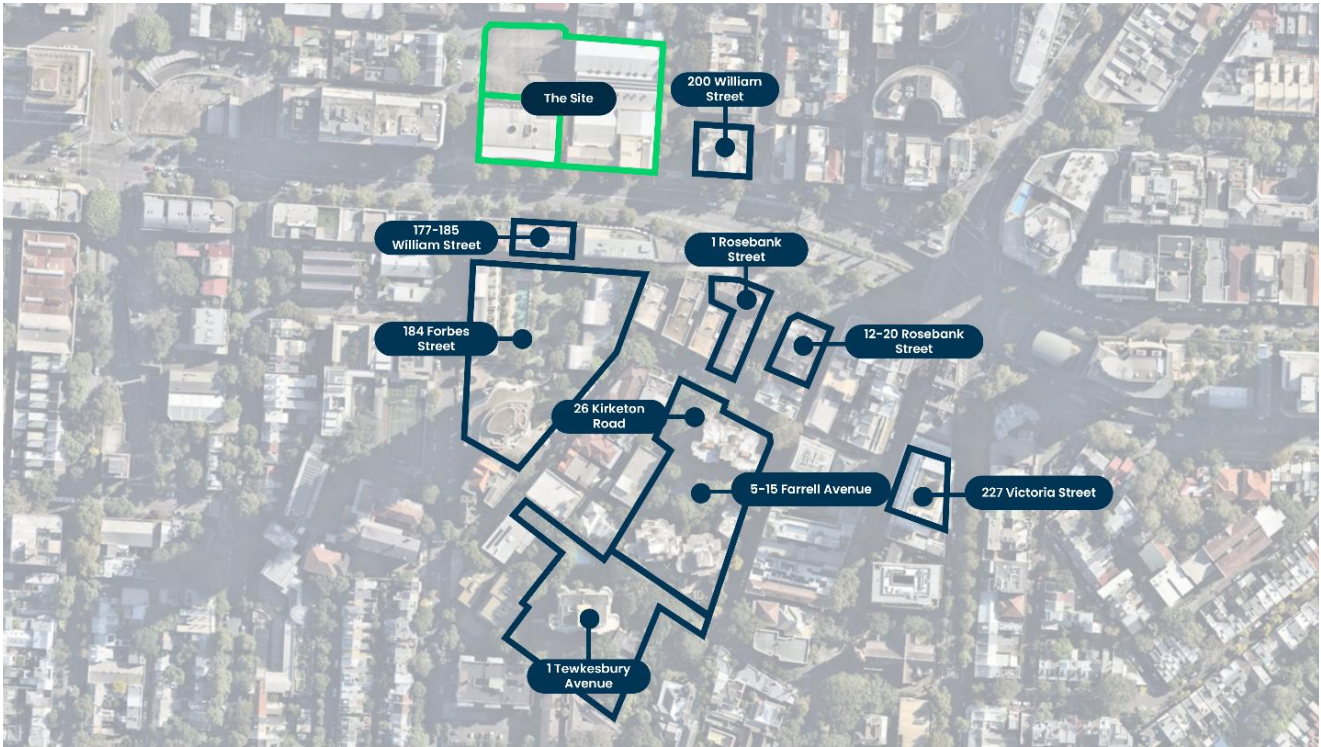
In response to the refined massing strategy and requests from the DPHI, as well as items raised during public exhibition, FJC undertook a revised overshadowing study to assess the potential impacts of the proposed

development on the surrounding environment. The assessment considers the updated built form in its entirety, including shadow impacts associated with the reallocation of massing to William Street East.

The following properties raised objections in relation to overshadowing

- 5-15 Farrell Avenue, Darlinghurst
- 26 Kirketon Road, Darlinghurst
- 177-185 William Street Darlinghurst
- 200 William Street, Woolloomooloo
- 227 Victoria Street, Darlinghurst
- 1-5 Rosebank Street, Darlinghurst
- 12-20 Rosebank Street, Darlinghurst
- 1 Tewkesbury Avenue, Darlinghurst
- 184 Forbes Street, Darlinghurst

Figure 21 Overshadowing Submission Analysis



Source: Nearmap 2026 (Annotated by Urbis)

FJC prepared sun-eye diagrams to determine the extent of overshadowing on these properties (refer **Appendix B**). The analysis is summarised as follows:

Table 16 Overshadowing Analysis Study

Building	Overshadowing	Existing >2 hour	<15 Minutes	Proposed >2 hour	<15 minutes	ADG Impact
200 William Street	Some	84%	11%	84%	11%	No change
1-5 Rosebank Street	Some	50%	0%	50%	0%	No change
177-185 William Street	Some	73%	18%	73%	18%	No change
169 William Street	Some	57%	0%	57%	0%	No change
184 Forbes Street (The Horizon)	Some	65%	11%	65%	11%	No change
2-4 Farrell Avenue (Richmond Hall)	Some	73%	0%	73%	0%	No change
6-8 Farrell Avenue (Rosebank Hall)	Some	62%	15%	58%	15%	4%
5-15 Farrell Avenue	Nil					No change
26 Kirketon Road	Nil					No change

1 Tewkesbury Avenue, Darlinghurst	Nil	No change
12–20 Rosebank Street	Nil	No change
227 Victoria Street (Top of the Town Apartments)	Nil	No change

The detailed overshadowing diagrams confirm that the proposal maintains acceptable and compliant levels of overshadowing when assessed against the ADG. A further detailed assessment was undertaken which focused on residential properties most proximate to areas of increased height, specifically 1–5 Rosebank Street, 2–4 Farrell Avenue (Richmond Hall) and 6–8 Farrell Avenue (Rosebank Hall). The relationship of these buildings to the development site is shown in Figure 22.

Figure 22 Overshadowing Analysis



Source: Nearmap 2026 (Annotated by Urbis)

### 2–4 Farrell Avenue and 1–5 Rosebank Street

The revised massing maintains a minimum of two hours of direct sunlight to all apartments that currently achieve this benchmark. No additional apartments fall below the ADG solar access criteria as a result of the proposed development. Overshadowing diagrams prepared by FJC (refer **Appendix B**) confirm that solar access to these buildings is retained.

### 6–8 Farrell Avenue (Rosebank Hall)

Rosebank Hall comprises 26 apartments, of which 16 apartments (62%) currently receive at least two hours of direct sunlight at mid-winter. Under the proposed scheme, solar access is reduced for one apartment only, representing 4% of dwellings within the building. The ADG states that where an apartment building does not currently receive 70% solar access, this must not be reduced by more than 20%. The proposed impact remains well within the ADG’s accepted threshold and reflects a limited and localised change arising from the refined massing strategy.

Overall, the overshadowing impacts associated with the proposed scheme are limited and do not result in widespread or unreasonable reductions in solar access. The assessment confirms that the proposal achieves acceptable outcomes for surrounding residential amenity and is consistent with the intent of the ADG.

### *Overshadowing compared to the 30% uniformed uplift scenario*

As illustrated in the overshadowing diagrams prepared by FJC, a 30% uniformed uplift scenario would result in severe overshadowing to 169 William Street and 177-185 William Street. Currently 169 William Street receives 57% solar access and 177-185 William Street receives 73% solar access.

Under the proposed scenario, the relocation of the mass results in these buildings maintaining their solar access at the current rate.

The additional height in the south eastern tower does create additional overshadowing however this is minor and all developments impacted continue to receive a compliant degree of solar access.

### *Overshadowing as result of the amended building envelope*

Relocating the mass from the central portion of the William Street building to the eastern tower results in a neutral overshadowing outcome.

The proposed design improves solar access to 177-185 William Street however results in greater overshadowing to 2-4 Farrell and 6-8 Farrell Avenue. As all affected apartments continue to receive solar access, in accordance with the requirements of the ADG, this is considered to be a neutral outcome.

### *Solar Access Within the Development*

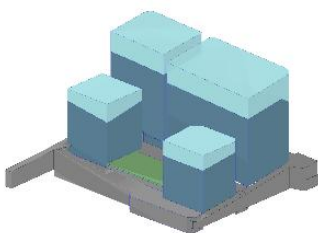
An ADG assessment of the revised scheme demonstrates that the proposed development also achieves compliant solar access outcomes for on-site apartments. In total, 75% of dwellings receive a minimum of two hours of direct sunlight at mid-winter, consistent with ADG requirements (see Section 4.9 below). Importantly, this is an increase from the original lodgement scheme which achieved 71.4% solar access across the site.

## 5.5 Options Analysis

The development has undergone a rigorous design development process with input from the DIP and the DPHI. The design options developed over time have been documented and demonstrate how the proposal has evolved in responding to this input and challenges that have emerged.

Table 17 Options Analysis

### *Option 1*

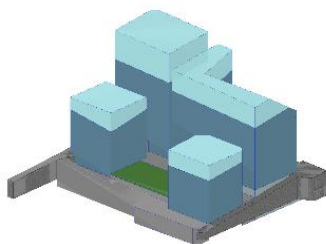


The provision of the affordable housing uplift allowed an additional 30% GFA increase to the LEP envelope across the site. This initial approach applied a uniform 30% increase in height and GFA across all buildings. However, this introduced a number of contextual issues including increased overshadowing, view loss, and environmental impacts to neighbouring buildings. This included widespread view loss to a number of apartments to the south and southeast. These impacts have been demonstrated in both the RtS Visual Impact Assessment (VIA) at **Appendix H**, and the updated overshadowing diagrams in **Appendix A**.

This option was not pursued due to the poor urban design outcome and the increased external amenity impacts to the south. In particular, this option resulted in the apartment building at 169 William Street and 177-185 William Street being severely affected by overshadowing. The 30% uniformed uplift scheme and the impact of the overshadowing is illustrated on the overshadowing plans provided by FJC at **Appendix F**.

This option also created wide spread view loss, as identified across all 70 photomontages within the Urbaine VIA Report and the Urbis VIA RTS Report. The 30% uniformed uplift scenario demonstrates that lower and mid level apartments within the residential towers to the south and south east would likely lose views to the Opera House and Harbour Bridge.

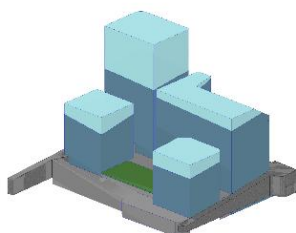
### Option 2



Option 2 proposed to improve solar access to the neighbouring residential building at 177–185 William Street to the south of the site by recessing part of the William Street West building and redistributing the resulting GFA across other areas of the site.

This option, whilst it resulted in improved solar access, continued to result in wide spread view loss consistent with Option 1. It also resulted in a poor urban design outcome. The DPPI as part of the scoping proposal phase, recommended not pursuing this option further.

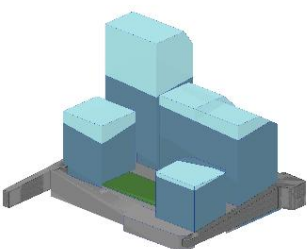
### Option 3



Option 3 was presented to the DPPI as a preliminary design for further architectural development following engagement. Through ongoing discussions, the proposed envelope raised detailed built-form considerations, particularly in relation to how more resolved design elements would continue to protect the solar amenity outcomes established under Option 2.

Concurrent design development found that Option 4 below achieved better design outcomes.

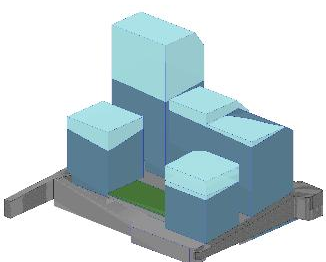
### Option 4



Following further development of the urban form, Option 4 introduced more refined massing to better manage impacts on surrounding sites. In particular, it sought to improve solar access to residential dwellings along the southern boundary while maintaining a coherent urban form. The GANSW and DPPI provided support for the applicant to progress with Option 4 as the preferred option.

This option was presented to the DIP in the first session. The DIP supported the urban design and built form massing approach however requested further amendments were made to improve view sharing. This resulted in the removal of height from the southwestern corner. The DIP also recommended redistributing massing towards the northern part of the site to achieve a more balanced composition.

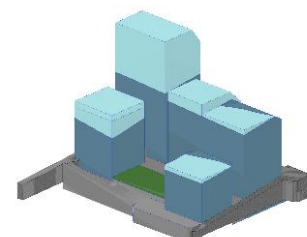
### Option 5



In response to DIP feedback, the design team explored adding height to the Forbes Street building and removing a level from the William Street West building.

However, any increase in height to the Forbes Street building would require substantial upgrades to building services, including additional lift capacity beyond the effective building height, as well as expanded fire stair and egress provisions. The results in an efficient building outcome. On this basis, Option 6 (below) was identified as the preferred outcome, as it most effectively responds to DIP feedback while mitigating built-form and amenity impacts.

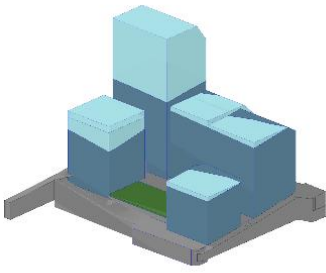
### Option 6



This option responded directly to DIP feedback by redistributing additional GFA to the Dowling Street building. This building was already of a size and scale that triggered the higher building service requirements. It preserved key view corridors, protected solar access to the publicly accessible open space and maintained compliance with the overshadowing of neighbouring residents. The DIP endorsed this scheme as the most contextually appropriate outcome.

Option 6 was the scheme submitted with the SSD application.

### Option 7



In response to feedback received from the DPHI, CoS, agencies and community members during the public exhibition of the project, the design team explored further refinements to the building envelope to improve view sharing. This has resulted in Option 7, being the final option submitted as part of this RtS.

This massing also includes comments raised by the Panel at the third DIP session. Ultimately, Option 7:

- ✔ Improves view sharing to the Harbour Bridge from apartments to the south.
- ✔ Improves view sharing to the Opera House from apartments to the south.
- ✔ Retains compliant solar access to southern neighbouring properties.
- ✔ Continues to present a skilful design response that is contextual appropriate for the existing and emerging character of William Street.

As identified above, Option 7 has been selected as the most appropriate design outcome in responding to the surrounding context. The building's approach to massing has been guided by careful assessment of solar access and view impact outcomes to surrounding developments, as explored further in Sections 4.3 and 4.5 below.

## 5.6 Traffic and Parking

TTPP have provided a letter that responds to the traffic items raised by DPHI and Council during the exhibition period (**Appendix V**).

### Loading Dock Access

The driveways have been amended to accommodate Council's 6m width requirement, as requested by CoS in their submission (see These changes have been supported by TTPP Transport Planning, including the preparation of revised swept path assessments demonstrating that the 6 metre driveway design can function appropriately. above). The service vehicle access point remains separated from the general vehicle access point, as described in Section 3.2.5 above. This is considered acceptable as a consolidated option would impact the provision of public domain on the site due to the variance of natural RLs across the site and the gradients required for service vehicles. Detailed consideration was given to alternative options prior to landing on the proposed option. The series of options considered for a consolidated vehicle access point are outlined in the Response to Submissions Design Report at **Appendix F**.

The loading dock height clearance remains non-compliant with the Australian Standard AS2890.2:2018 which requires a 4.5m height clearance for 8.8m Medium Rigid Vehicles. The development proposes a 4.2m height clearance, which is a variance of 30cm

Compliance with the Standard is constrained by the existing footpath levels and flood planning levels on William Street. An increase in height of the loading dock would either increase the ramp length required, impacting on retail opportunities and pedestrian activation throughout the site, or require deeper basement levels, increasing car parking ramp lengths and excavation. Confirmation from a qualified BCA consultant that the proposed loading dock height clearance is acceptable in relation to NCC has been received.

The loading dock will be signposted for 4.2m headroom clearance at the entrance using a combination of height bars and signs, with areas within the loading dock that have lower clearance to also be signposted to ensure drivers are aware of the limitations. This response also considers the limited loading and servicing generation of the site, with vans and small rigid trucks being the primary service vehicles required. The Council waste vehicle is expected to be the largest vehicle to access the site, with an MRV bay also provided for removalist and delivery trucks if required.

### Parking

**Table 6** above outlines the updated parking rates. It is noted that the residential parking is governed by the Housing SEPP which stipulates minimum car parking rates. In this regard, the proposed development has provided residential car parking in accordance with the market housing rates. The proposed development

includes 58 affordable housing units, that are required to be retained as affordable housing for a minimum of 15 years. After that time, those units could potentially become market housing. Applying the market housing rates ensures that should these be converted, that there is a compliant level of car parking in accordance with those market rates. This is a position that has been accepted by the IPC in their decision of SSD-66826207.

The parking provision provided for the retail and residential visitor component is well below the maximum permitted on the site and therefore a balanced outcome for parking is achieved across the land uses, which remains compliant with the applicable Housing SEPP and Sydney LEP parking rates.

## 5.7 Pedestrian Wind Assessment

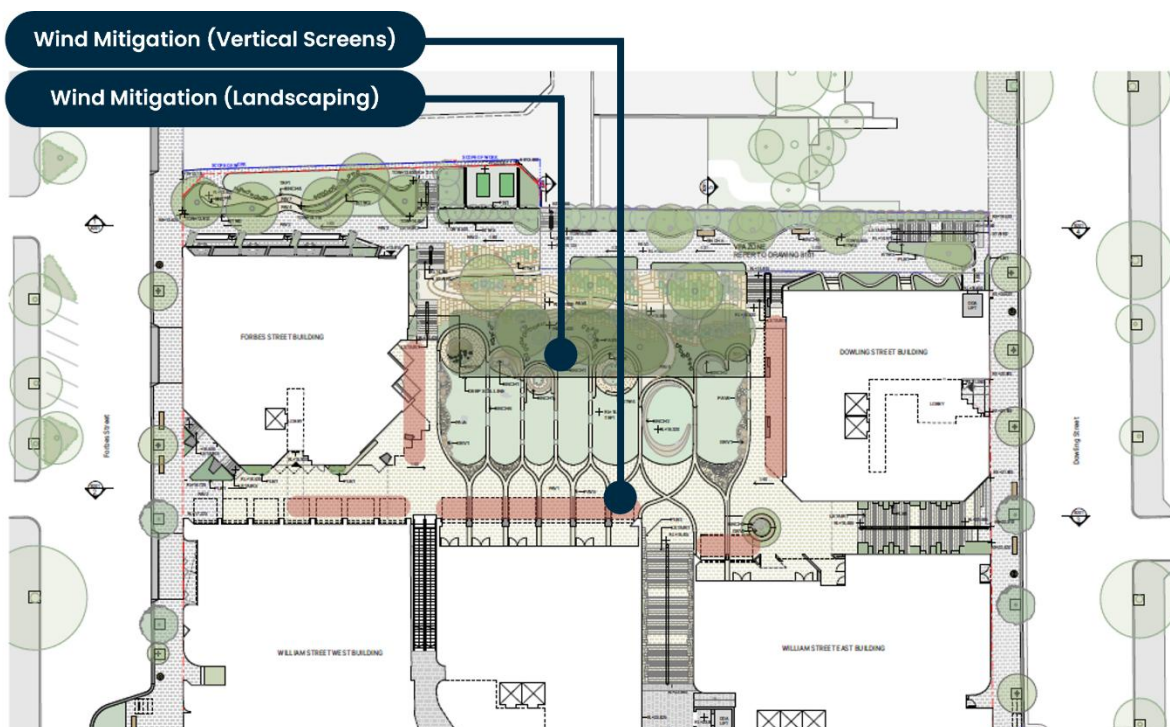
An updated Pedestrian Wind Assessment has been undertaken to inform the Applicants response to submissions raised and to test the performance of the refined development against established benchmark scenarios.

Rooftop testing with an assumed flat roof in the 30% blanket uplift scenario was used to establish baseline conditions, providing a robust reference for assessing the proposed envelope. The proposed rooftop design introduces a range of built and landscape elements that are expected to improve wind comfort outcomes. These include perimeter balustrades, areas of landscaping and semi-enclosed spaces, as well as roof articulation and plant and lift overruns that provide shielding from prevailing winds.

The increase in balustrade heights to 1.8 metres is expected to materially improve conditions in areas intended for resident use. Overall, the rooftop is anticipated to support a mix of uses, with sheltered areas suitable for sitting and more exposed edges appropriate for movement, which is consistent with expectations for rooftop open space in this context and considered suitable from a wind perspective.

Within the central plaza, targeted wind mitigation measures have been introduced to create localised calm areas suitable for longer-term stationary activity consistent with the Pedestrian Sitting classification and the intended use of the space (refer to the updated Mitigation Measures Table at **Appendix D**). These measures include the installation of vertical screens around outdoor dining areas and the introduction of wind-mitigating landscaping in the locations identified in **Figure 14** below.

Figure 23 Central Plaza wind Mitigation Strategy



Source: FJC Studio and CPP

The development is not expected to generate adverse wind effects beyond those typically experienced in comparable inner-city public spaces. Wind conditions within the park and plaza areas are comparable to other well-used Sydney parks, and the proposed wind mitigation measures will further enhance comfort. These measures are expected to moderate wind speeds and create localised calmer areas within the Central Plaza, supporting its intended role as a place for sitting and informal gathering.

From a broader site perspective, the SSDA scheme results in wind conditions that are generally comparable to those tested under the approved concept envelope and the blanket 30% uplift scenario. While it is acknowledged that amendments have been made to the development since wind tunnel testing of the SSDA scheme in May 2025, the Wind Report concludes that the SSDA envelope as proposed under this RtS is very similar to the lodged scheme from a wind perspective, and retesting of the updated configuration with the relocated storey onto the William Street East building is not required.

The proposal is not expected to result in unacceptable wind impacts for pedestrians or residents utilising rooftop spaces and responds appropriately to the DPHI’s concerns. The incorporation of built form articulation and targeted mitigation measures ensures that wind conditions across the site, including rooftop areas and the Central Plaza, are appropriate for their intended use and consistent with relevant comfort criteria.

## 5.8 Landscaping and Public Domain

The proposed landscape plans have been updated to reflect latest refinements to the project in response to the RtS, as well as comments raised in by the DPHI in their Key Issues letter. These are available at **Appendix E**. The updated landscape design across the site achieves the relevant compliance requirements under the ADG as detail in the below table.

Table 18 Landscape Compliance Requirements

Item	Requirement	Proposed
<b>Communal Landscaped Area</b>	1150sqm (25% of the site area)	2,010 sqm or 32% of the overall landscaped area (excludes VPA area)
<b>Deep Soil</b>	423sqm	781sqm (excludes VPA area)
<b>Canopy Cover</b>	15%	1,015sqm or 15.85% (includes rooftop but excludes VPA area)

An updated public domain plan identifying the trees proposed for retention in addition to those proposed to be planted and removed is included in the Updated Landscape Plans. Similarly, the demolition plan has been updated to reflect the trees proposed for removal across the site. The relevant figures are provided below:

Table 19 Public Domain Tree Figures

Item	Number of Trees
<b>Existing trees assessed</b>	14
<b>Trees to be removed</b>	1 (Tree 3)
<b>Trees to be retained</b>	13
<b>Trees proposed</b>	4 (in the public domain, excluding VPA land)

Figure 24 Public Domain Trees



Source: FJC Studio

This remains consistent with the lodged scheme, with Tree 3 being removed to make way for the proposed southern driveway on Forbes Street. Tree 3 has moderate retention value, and a replacement tree is proposed on the northern side of the driveway as identified in **Figure 15** above.

## 5.9 Crime Prevention Through Environmental Design

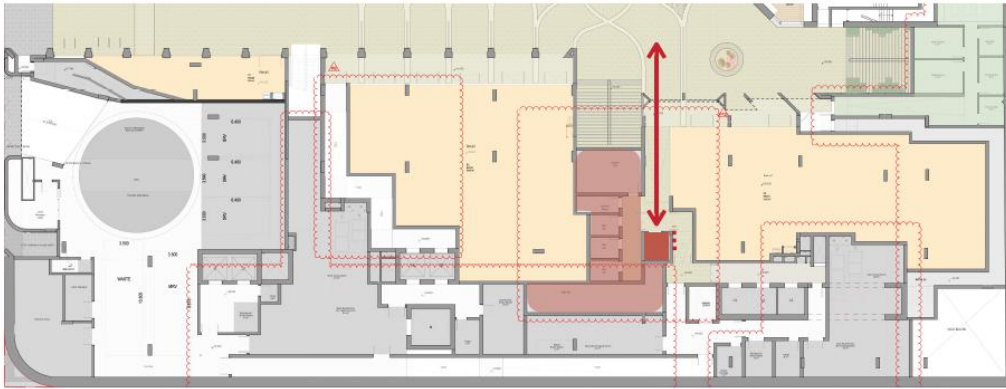
Submissions from the community raised concerns about the operation of the publicly accessible park in relation to safety and passive surveillance. CPTED has been considered in the development of the publicly accessible open spaces and landscape design.

A robust list of mitigation measures has been implemented into the proposal and will be enforced during the development's operation (refer to the Updated Mitigation Measures Table at **Appendix D**). These measures include after-hours security and CCTV throughout the through-site links and the requirement for a Plan of Management to be developed for the site to detail hours of operation, security procedures and routine cleaning and maintenance.

In addition to the above, an opportunity for greater sight lines and passive surveillance to the retail lift core, has been identified and addressed as part of the post-lodgement DIP (DIP 3). Previously, the DDA lift on the ground floor was located behind retail tenancy 03 and not immediately visible from the central park, and access to the retail WC facilities was located behind retail tenancy 02 and accessible through a "dog-leg" walkway. The panel raised this as a potential safety risk for accessing the DDA given that the site is accessible 24/7.

The DDA lift has since been relocated to allow for direct access and a clear visual connection from the publicly accessible Central Plaza and the public domain on William Street (see **Figure 16** below). It is understood that this refinement better aligns with the CPTED principles in promoting passive surveillance across the development.

Figure 25 Relocated DDA Lift



Revised Forbes Street (Plaza) level showing modifications to the access to the DDA lift requested



Source: FJC Studio

The proposal continues to align with the objectives of the Willoughby DCP in terms of amenity and safety and maintains its consistency with the four CPTED principles as outlined in the lodged CPTED Report.

## 5.10 Apartment Design Guide Compliance

A comprehensive ADG Assessment with supporting schedules and diagrams has been provided at **Appendix F** of this RtS. This Section provides a summary of ADG compliance relating to key areas raised in the submissions. A summary of the compliance is provided in the subsequent sections.

### Solar Access

**Table 13** below outlines compliance with the ADG's solar access. In summary, the RtS proposal demonstrates an improvement in solar access outcomes, with an increase in apartments achieving the minimum 2 hours of sunlight and a reduction in apartments receiving less than 15 minutes of sunlight, resulting in compliance with the ADG benchmarks. As abovementioned in Section 3.2.3, significant design work has been undertaken during the RtS period to increase the solar access to the affordable housing units. For complete details on the solar access refinements specific to the affordable housing units, please refer to the above section where this is discussed.

Table 20 Solar Access ADG Assessment

	ADG Requirement	Lodgement Scheme	RtS Scheme	Difference
<b>Receiving 2 or more hours of sun on 21 June</b>	70%	71.4% (162 of 227 apartments)	75% (176 of 235 apartments)	+3.6%
<b>Receiving less than 15 minutes of sun on 21 June</b>	15%	16.7% (38 of 227 apartments)	15% (36 of 235 apartments)	-1.7%

### Cross Ventilation

The ADG requires that at least 60% of apartments are naturally cross ventilated in the first nine storeys of the building. The DIP raised cross ventilation as a concern, as only 48% of affordable housing units achieved natural cross ventilation.

Following the DIP session, the proposed development has undergone minor façade refinements to enable greater opportunities for natural cross ventilation. As suggested by the DIP, thermal modelling was also assessed to understand if greater cross ventilation could be achieved due to the William Street façade's exposure to high winds. These additional refinements and assessments have resulted in an increase in natural cross ventilation, as outlined in 14 below, with the 50% of the affordable housing units being cross ventilated, and 63% of the total units proposed being cross ventilated.

Table 21 Cross Ventilation ADG Assessment

	ADG Requirement	SSDA – affordable housing (October 2025)	Revised Total Development Overall
<b>Natural Cross Ventilation (first 9 storeys)</b>	60%	48%	63%
<b>Noise Affected</b>		27	55
<b>Single Aspect</b>			37%

Updated diagrams demonstrating the path of air travel for each apartment have been provided with the Design RtS Report as requested by the DPHI.

### Communal Open Space

The ADG requires that a minimum of 25% of the site area should be devoted to communal open space.

A total communal open space of 2,984sqm is proposed, which exceeds the minimum ADG requirement of 1,599.5sqm (25% of the site area) by 1,384.5sqm (189%). The communal open space calculation is made up of the following areas:

- Ground level open space – 2,568sqm
- Rooftop open space – 462sqm

### Storage

The ADG requires minimum dedicated storage volumes for apartments, with at least 50% located within the unit. The dedicated storage volumes are provided overleaf.

- Studio: 4m<sup>3</sup>
- One bedroom: 6m<sup>3</sup>
- Two bedrooms: 8m<sup>3</sup>
- Three bedrooms: 10<sup>3</sup>

A Storage Schedule Summary has been submitted with the Response to Submissions Design Report that outlines the internal and basement storage volume provided for each apartment. Of the 235 apartments proposed, 126 of them have basement storage units equating to a total of 438m<sup>3</sup> of basement storage. All apartments provide a minimum of 50% of storage area internal to the apartment, and all apartments comply with the minimum dedicated storage volumes set out in the ADG.

## 5.11 Additional Impact Assessments

Additional assessments and advice have been prepared to respond to the issues raised within the submissions. These include:

- Open Space Plan
- Management of Open Space and Easements
- Updated Noise and Vibration Assessment
- Waste Management

The findings and recommendations of the additional impact assessments are discussed in detail in the RtS Response Table at **Appendix A**.

# 6 Updated Project Justification

This section provides an update project justification and evaluation of the project as a whole.

## 6.1 Project Design

The proposed development and the subsequent design amendments have been carefully designed to minimise and appropriately manage any potential impacts and concerns raised during the public exhibition of the project. The location of the development in close proximity to Kings Cross Train Station and the CBD provides an opportunity to accommodate additional height and density in line with broader planning objectives whilst remaining consistent with the surrounding future context of the area.

The built form generally continues to reflect the previously approved concept envelope and competition winning scheme, retaining the fundamental design principles while continuing to demonstrate design excellence. The project has undergone a robust and thorough process post competition to ensure the location of the additional mass and form represents the most appropriate contextual outcome. In this, the 30% uplift in height and density available under the Housing SEPP has been seamlessly incorporated and further refined, ensuring improved outcomes in relation to overshadowing, views, privacy, visual character and wind. The building's massing was acknowledged by the DIP as being considered and clever in its response to the site's context upon their third review of the project following its exhibition and subsequent refinements.

The proposal supports the provision of additional affordable rental housing, delivering tangible public benefits. These include new housing opportunities in a highly accessible location, with great access to transport, open space and employment nodes in the health and education sectors. The design enhances community benefit through its ground floor uses and connections, contributing to a vibrant and active streetscape.

## 6.2 Strategic Context

The proposal continues to be consistent with the strategic framework and has been considered against key Government and Council documents including the following:

- National Housing Accord 2022
- NSW Housing Strategy 2041
- Greater Sydney Region Plan – A Metropolis of Three Cities
- Our Greater Sydney 2056: Eastern City District Plan
- City Plan 2036: Local Strategic Planning Statement (March 2020)
- Sustainable Sydney 2030 – 2050
- Housing for All: City of Sydney Local Housing Strategy
- Future Transport Strategy
- NSW Better Placed
- Connecting to Country Framework

All levels of strategic planning seek to facilitate additional housing (including affordable housing) and 'transit-oriented development' through the '30-minute city' concept. The proposal meets these objectives, given it:

- Proposes residential accommodation with high amenity in an accessible area. The site is proximate to Kings Cross Train Station and several bus stops. These transport services provide access to Greater Sydney, including key employment centres.

- Will help bolster housing in the Woolloomooloo area while providing a significant number of affordable housing dwellings with high amenity. This directly addresses the NSW Government mandate to boost housing supply and tackle housing affordability.
- Provides employment generating, non-residential floor space on the ground level to activate the ground plane and provide a balanced mix of land uses.

The proposal seeks the orderly and economic redevelopment of an appropriately located site with contemporary infill that exhibits design excellence. The Applicant has continued to invest in a GANSW endorsed design excellence process post-lodgement to ensure that future built form on the site will achieve the vision set out in the relevant strategic documents.

## 6.3 Statutory Context

The relevant State and local environmental planning instruments are assessed in **Appendix C** to ensure that the project refinements are appropriately addressed in relation to the relevant statutory requirements. The assessment concludes that the proposal continues to comply with the relevant statutory provisions as summarised below:

- The proposed development has been assessed and designed in respect to the relevant objects of the EP&A Act.
- The proposal generally complies with the relevant provisions under the SLEP as detailed in **Appendix C**. Where a variation is proposed to a principal development standard, a clause 4.6 variation request has been prepared to demonstrate that the non-compliance can be supported on a 'merit' basis, with the proposal remaining consistent with the relevant objectives of Part 4, despite the variation.
- The proposal continues to comply with the relevant State Environmental Planning Policies, including the Housing SEPP as detailed in **Appendix C**.

## 6.4 Community Views

Community and stakeholder engagement has been undertaken by the Applicant and Urbis in preparation of the SSDA. This included direct engagement and consultation with:

- Surrounding landowners, residents and businesses.
- Government, agency, utility services and other key stakeholders.

In accordance with the EPA Regulation, the EIS was placed on formal public exhibition for 15 days between 30 October 2025 and 13 November 2025. This Submissions Report provides responses to each issue raised in the submissions and sets out the updates made to the proposal in response to the submissions received, along with the supporting technical information.

## 6.5 Likely Impacts of the Proposal

The refined proposal has been assessed considering the potential environmental, economic and social impacts. The assessment of impacts carried out in Section 4 confirms a satisfactory outcome and compliance with key criteria in regard to the following:

- Built form and urban design;
- Amenity impacts and ADG compliance;
- Traffic and parking;
- Pedestrian wind;
- Landscaping and public domain;
- Crime prevention.

No new or additional adverse impacts have been identified as a result of the amended proposal. The proposed built form amendments are considered to have improved view sharing impacts, as documented in the Rts VIA.

All other impacts remain unchanged from those assessed in the EIS and the mitigation measures remain.

The potential impacts can be mitigated, minimised or managed through the measures discussed in detail within Section 5 and as summarised in Rts **Appendix C**.

## 6.6 Suitability of the Site

The site is considered highly suitable for the proposed development for the following reasons:

- The Proposal is consistent with the MUI (Mixed Use) zone objectives, is permitted with consent and satisfactorily addresses the relevant provisions in the SLEP and DCP.
- The site is currently underutilised and presents a significant opportunity to provide a high-density mixed-use building in Woolloomooloo.
- The site is not affected by critical constraints which cannot be successfully abated through skilful design or the implementation of mitigation measures.
- The character and scale of the development is compatible with its existing and desired future context.
- The proposal will co-locate housing and employment generating floorspace in an accessible area, contributing to dwelling and job targets set out in the LSPS for the Macleay Street and Woolloomooloo Village and supporting the '30-minute city' vision.

## 6.7 Public Interest

The proposed development is considered to be in the public interest for the following reasons:

- The proposal delivers 58 affordable apartments which equates to 25% of the residential dwelling stock. The site is in an accessible location, directly responding to the NSW Government's policy mandate to improve housing choice and affordability. The site's location allows easy access to employment centres, retail, open space, and social infrastructure (schools, hospitals etc). The environmental, social or economic impacts will result from the proposal are considered reasonable and appropriate.
- The proposal is consistent with relevant State and local strategic plans. Accordingly, it delivers a development outcome consistent with the vision established by the National Housing Accord, NSW Government's Housing Strategy and the in-fill affordable housing provisions of the Housing SEPP.
- Whilst the proposed height results in a non-compliance with the permitted controls, the built form has been strategically placed to mitigate impacts on other sensitive parts of the site, resulting in the transfer of built form to those less sensitive parts of the site. This demonstrates a skilful design response that mitigates offsite impacts to be within a reasonable and acceptable degree
- The EIS and accompanying Design Report demonstrates that the proposed development has been specifically designed to reduce offsite impacts, particularly in relation to overshadowing and views, to the greatest extent possible, whilst balancing the need to deliver affordable housing.
- The site will facilitate the orderly and economic use and development of the land.

Having considered all relevant matters, we conclude that on balance, the proposed development is in the public interest as it retains the fundamental design excellence elements of the winning competition scheme, whilst strategically incorporating the additional mass to enable the delivery of a significant quantum of affordable housing in an inner-city location.

# Disclaimer

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# Appendix A – Response to Submissions Table

# Appendix B – Updated Architectural Drawings

# Appendix C – Updated Statutory Compliance Table

# Appendix D – Updated Mitigation Measures Table

# Appendix E – Updated Landscape Plans

# Appendix F – Response to Submissions Design Report

# Appendix G – Updated Community Housing Provider Letter

# Appendix H – RtS Visual Impact Assessment

# Appendix I – Amended Clause 4.6 Variation Report (Height)

# Appendix J – Amended Clause 4.6 Variation Report (FSR)

# Appendix K – Updated Pedestrian Wind Assessment

# Appendix L – Updated Survey Plan

# Appendix M – Easement Plan

# Appendix N – Draft Plan of Subdivision

# Appendix O – Updated Noise and Vibration Impact Assessment

# Appendix P – Updated Ecologically Sustainable Development Report

# Appendix Q – Updated Operational Waste Management Plan

# Appendix R – Competitive Design Alternatives Report

# Appendix S – Contamination Site Auditor Statement

# Appendix T – DCCEEW RFI Response Letter

# Appendix U – Flood RTS Response Letter

# Appendix V – Traffic RtS Response Letter

# Appendix W – Design Integrity Panel Letter 3

# Appendix X – Cross Ventilation RFI Response Letter

# Appendix Y – BCA RFI Response Letter

# Appendix Z – Updated BASIX Certificate



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and communities  
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