

**URBIS**

# **Clause 4.6 Variation Report | Height**

164-172 and 174-194 William Street,  
Woolloomooloo

Prepared for  
**William Street Residential Pty Ltd**  
September 2025

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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.

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.

Title: Sacred River Dreaming  
Artist Hayley Pigram  
Darug Nation  
Sydney, NSW

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# Executive Summary

This Clause 4.6 Variation Request (**the Request**) has been prepared by Urbis Ltd (**Urbis**) on behalf of William Street Residential Pty Ltd (**the applicant**) and accompanies a State Significant Development Application (**SSDA**) for mixed-use infill affordable housing at 164–172 and 174–194 William Street, Woolloomooloo (**the site**).

Clause 4.3 of the Sydney Local Environmental Plan 2012 (**SLEP**) applies maximum building heights of 22m and 35m across the site. Under Part 2, Division 1, Clause 16(3) of the State Environmental Planning Policy (**Housing**) 2021 (**Housing SEPP**), an additional 30% height bonus is permitted where 15% affordable housing is provided (which is the case with the proposed development). This results in applicable maximum heights of 28.6m to the northern portion of the site and 45.5m to the southern portion. The Housing SEPP also allows for a similar 30% bonus to mapped FSR standard (in addition to any other bonuses under the local controls).

Through careful consideration and design exploration, the applicant's design team has explored the most appropriate ways to ensure that the floor space bonuses under the Housing SEPP respond most positively to the objectives of the height standard and minimise unreasonable environmental impacts to surrounding properties. In the circumstances of the case, the proposal seeks a maximum height of 35.8m (north) and 66.3m (south), which exceeds the development standard. Notably, the south-west and north-west buildings comply with the height control, and this variation request relates only to the buildings that exceed the standard.

While the proposal exceeds the height development standards, the design has undergone a pragmatic and considered process to minimise adverse amenity impacts and deliver a better planning outcome. Massing options demonstrate that a compliant scheme would generate greater bulk and amenity impacts, particularly at the site's western periphery, whereas the proposed design achieves a more sensitive and balanced built form. The outcome preserves solar access and views to the extent practicable, while also enhancing amenity for neighbouring properties and public spaces.

The uplift has been deliberately distributed to minimise bulk and height along the western edges of the site, where potential amenity impacts are most pronounced. Instead, additional height and massing is concentrated towards William Street east and Dowling Street where a taller built form is contextually appropriate, while the design scales down towards the Woolloomooloo village to the north. A uniform application of the 30% SEPP bonus would result in a compliant outcome that has greater visual, overshadowing and view impacts on sensitive interfaces.

The design also responds to the challenging site topography, with the built form stepping with the slope to achieve a coherent and efficient layout. The proposed massing has been endorsed by the Design Integrity Panel as providing an appropriate architectural and urban design outcome.

Accordingly, the proposal represents a better planning outcome than strict compliance with the height standard, balancing the delivery of affordable housing with the protection of neighbouring amenity and local character. In these circumstances, the variation is well founded, consistent with planning principles, and warrants flexibility in the application of the height standard.

# 1. Introduction

This Clause 4.6 Variation Request (**the Request**) has been prepared by Urbis Ltd (**Urbis**) on behalf of William Street Residential Pty Ltd (**the applicant**) and accompanies a State Significant Development Application (**SSDA**) for mixed-use infill affordable housing at 164–172 and 174–194 William Street, Woolloomooloo (**the site**).

The request seeks a variation to the maximum building height for the site prescribed in State Environmental Planning Policy (**Housing**) 2021 (**Housing SEPP**). This request is made pursuant to Clause 4.6 of the Sydney Local Environmental Plan 2012 (**SLEP**).

## 1.1. Site Context

The site is known as 164-172 and 174-194 William Street, Woolloomooloo and is legally described as Lot 52 in DP 1049805 and Lot 1 in DP 816050. Key characteristics of the site include:

- The site has frontages of 93.4m to William Street in the south.
- The site is irregular in shape and has a total area of 6,402sqm.
- The topography of the site falls significantly from William Street in the south to Judge Lane in the north.
- The site currently contains a warehouse style structure and glass office building.
- Under the SLEP 2012 the site is zoned Mixed Use MU1.

An aerial photograph of the site is provided at **Figure 1** and photographs of the site are provided at **Figure 2**.

Figure 1: Aerial Photograph



Figure 2: Site Photos



Picture 1: Site viewed from William Street

Source: Google Maps, 2025



Picture 2: Site viewed from Dowling Street

Source: Urbis, 2021



Picture 3: Site viewed from Judge Lane

Source: Urbis, 2021



Picture 4: Site viewed from the corner of William and Forbes streets

Source: Google Maps, 2025

## 2. Proposed Development

The SSDA seeks consent to redevelop the site for the purpose of a mixed-use infill affordable housing development comprising:

- Four buildings with a maximum gross floor area of 33,036sqm, including
  - 7 storey residential building with a maximum height of 24.1m (RL +37.550)
  - 9 storey mixed-use building with a maximum height of 35.5m (RL +51.380)
  - 10-18 storey mixed-use building with a maximum height of 65.5m (RL +86.470)
- 227 dwellings including:
  - 167 market dwellings
  - 60 affordable dwellings
- Ground and first floor retail uses that activate the laneway and parks edge and provide retail offerings to William Street.
- A 1000sqm publicly accessible central park
- Public domain works and through site links.
- Four basement levels for parking, services and storage.
- Vehicular and loading access from Forbes Street.

A numerical overview of the proposed development is provided in the below table.

Table 1: Numerical Overview of the Proposed Development

Element	Proposed Development	
Site Area	6,398sqm	
Building Height	<ul style="list-style-type: none"> <li>▪ 7 storey residential building with a maximum height of 24.1m (RL +37.550)</li> <li>▪ 9 storey mixed-use building with a maximum height of 35.5m (RL +51.380)</li> <li>▪ 10-18 storey mixed-use building with a maximum height of 65.5m (RL +86.470)</li> </ul>	
Gross Floor Area	Total GFA	33,036sqm
	Retail GFA	1,718sqm
	Residential GFA	25,816sqm
	Affordable Housing GFA	4,942sqm
Floor Space Ratio	Total FSR	5.11:1.
	Non- Residential FSR	0.31:1.

# 3. Planning Instrument, Development Standard and Proposed Variation

## 1. What is the planning instrument you are seeking to vary?

The application seeks to vary the State Environmental Planning Policy (Housing) 2021 (**Housing SEPP**).

## 2. What is the site's zoning?

The site is zoned MU1 Mixed Use in accordance with the Sydney Local Environmental Plan 2012 (**SLEP**).

## 3. What is the development standard to be varied?

The standard proposed to be varied is the maximum height of building standard under Part 2, Division 1, Clause 16(3) of the Housing SEPP.

Part 2, Division 1, Clause 16(3) of the Housing SEPP states:

### **16 Affordable housing requirements for additional floor space ratio**

*(1) The maximum floor space ratio for development that includes residential development to which this division applies is the maximum permissible floor space ratio for the land plus an additional floor space ratio of up to 30%, based on the minimum affordable housing component calculated in accordance with subsection (2).*

*(2) The minimum affordable housing component, which must be at least 10%, is calculated as follows—*

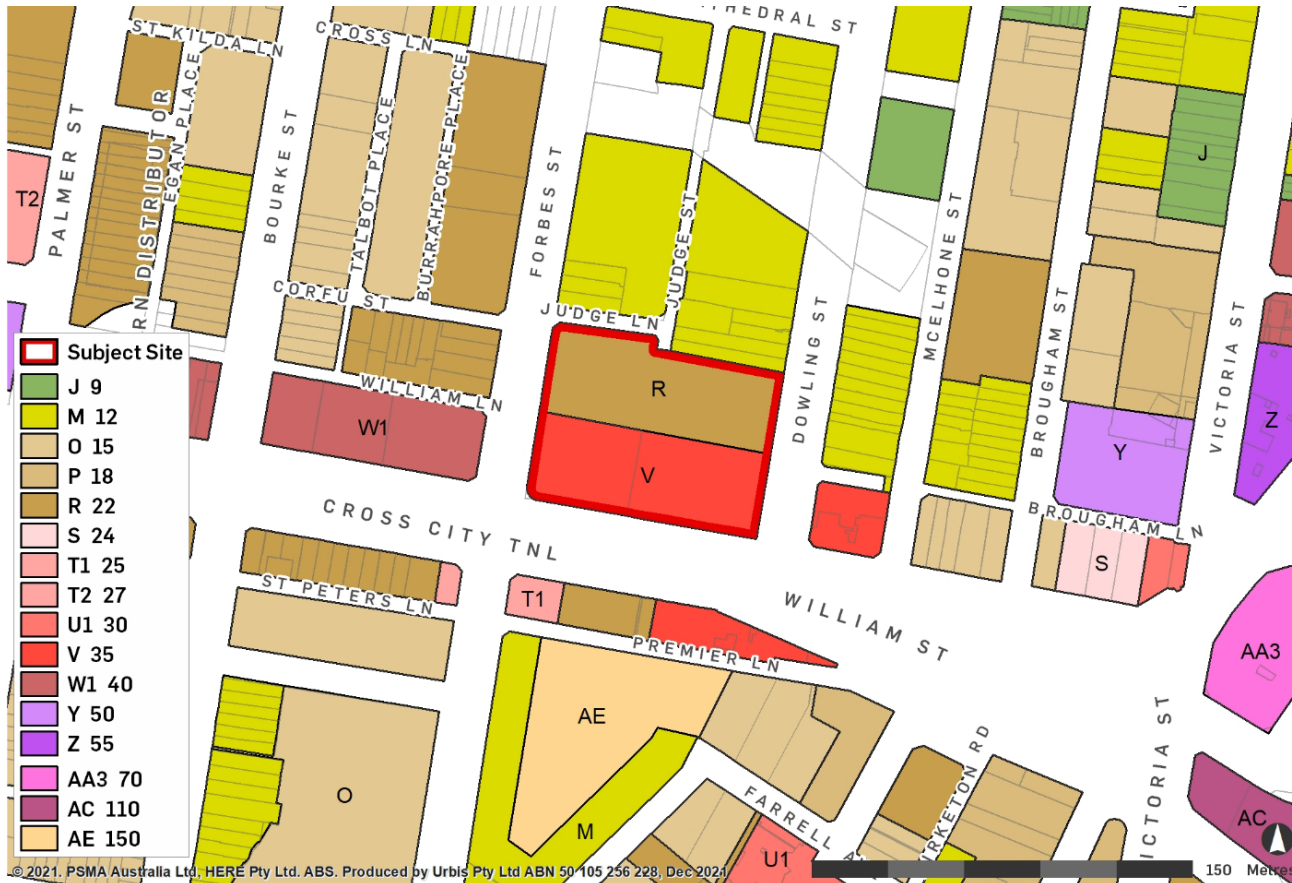
$$\text{affordable housing component} = \frac{\text{additional floor space ratio}}{\text{(as a percentage)}} \div 2$$

*(3) If the development includes residential flat buildings or shop top housing, 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).*

*(4) This section does not apply to development on land for which there is no maximum permissible floor space ratio.*

The permissible building height for the land is set out in Clause 4.3 of the SLEP and shown on the LEP Height of Buildings map below.

Figure 3: SLEP Height of Buildings Map



Source: Urbis

The numerical value of the development standard applicable to the site under Clause 4.3 of the SLEP is 22m for the northern half of the site and 35m for the southern half.

Part 2, Division 1, Clause 16(3) development standard of the Housing SEPP permits an additional 30% height bonus on top of the building height (in metres) permissible under clause 4.3 of the SLEP (based on 15% affordable housing provision), resulting in a maximum height of building development standard of 28.6m for the northern half of the site and 45.5m for the southern half of the site.

The objective of the In-fill affordable housing provisions of the Housing SEPP is as follows:

*15A Objective of division*

*The objective of this division is to facilitate the delivery of new in-fill affordable housing to meet the needs of very low, low and moderate income households.*

The objectives of the development standard in the SLEP are as follows:

- (a) *to ensure the height of development is appropriate to the condition of the site and its context,*
- (b) *to ensure appropriate height transitions between new development and heritage items and buildings in heritage conservation areas or special character areas,*
- (c) *to promote the sharing of views outside Central Sydney,*
- (d) *to ensure appropriate height transitions from Central Sydney and Green Square Town Centre to adjoining areas,*
- (e) *in respect of Green Square—*
  - (i) *to ensure the amenity of the public domain by restricting taller buildings to only part of a site, and*
  - (ii) *to ensure the built form contributes to the physical definition of the street network and public spaces.*

#### 4. Type of Development Standard?

The request is seeking to vary the numeric height of building control pursuant to the Housing SEPP.

#### 5. What is the Numeric Value of the Development Standard in the Environmental Planning Instrument?

Under the SLEP, the maximum height of buildings is 22m and 35m respectively. With the Housing SEPP incentive provisions, the maximum height of buildings is 28.6m and 45.5m.

The proposal seeks to exceed the maximum building height of 28.6m and 45.5m.

#### 6. What Is the Difference Between the Existing and Proposed Numeric Values? What Is the Percentage Variation (Between the Proposal and The Environmental Planning Instrument)?

The site contains two height limits, with the proposed development containing four separate buildings. Two of those four buildings exceed the building height, as illustrated below:

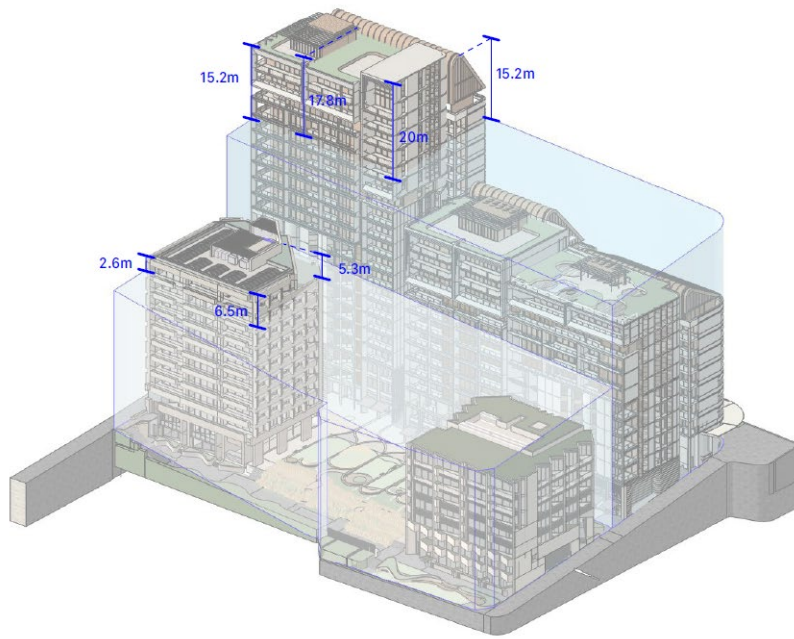
Figure 4: Proposed Height

Building	Element	RL	Height in metres	Breach
Northeast Building (Dowling Street)	Northeastern corner	RL51.68	31.2m	2.6m
	Northwestern corner	RL51.68	34.6m	6.5m
	Top of plant	RL53.88	35.8m	5.3m
Southeast Building (William Street)	William Street frontage (top of roof ridge)	RL85.82	66.3m	15.2m
	Internal Park frontage	RL86.47	70.8m	20m
	Northeastern corner	RL85.82	60.2m	14.2m

#### 7. Visual Representation of the Proposed Variation

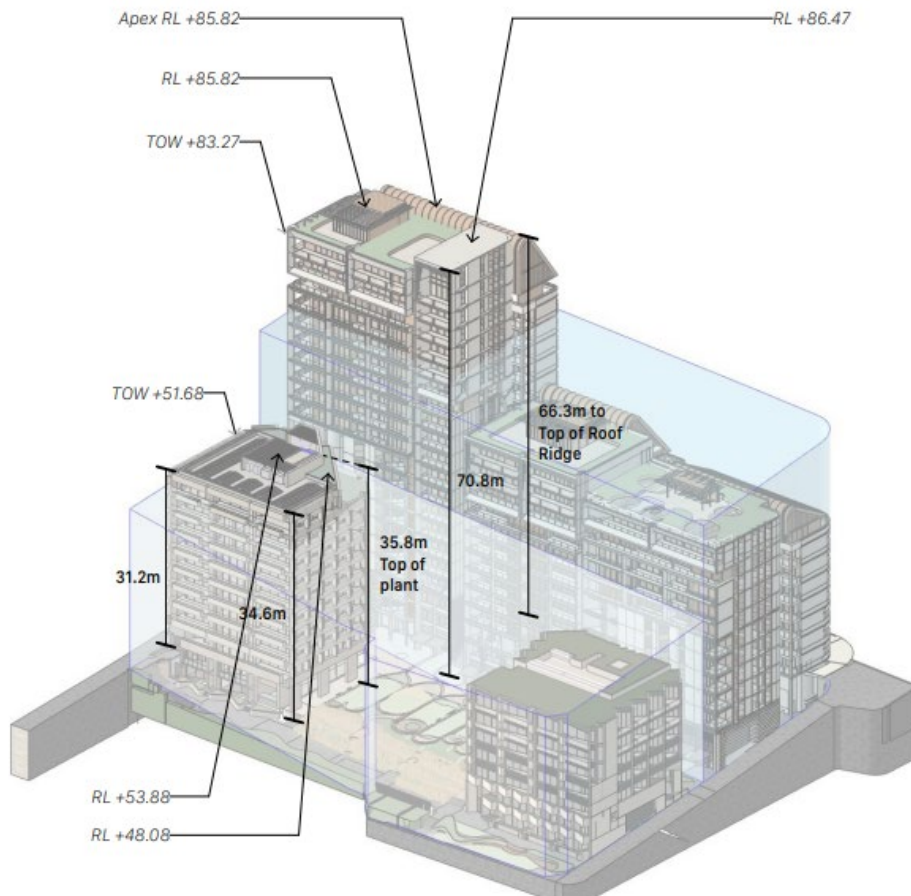
The proposed variation is represented in the following 3D building height plane below:

Figure 5: Proposed Building Height Comparative to the Height Plane (Breach)



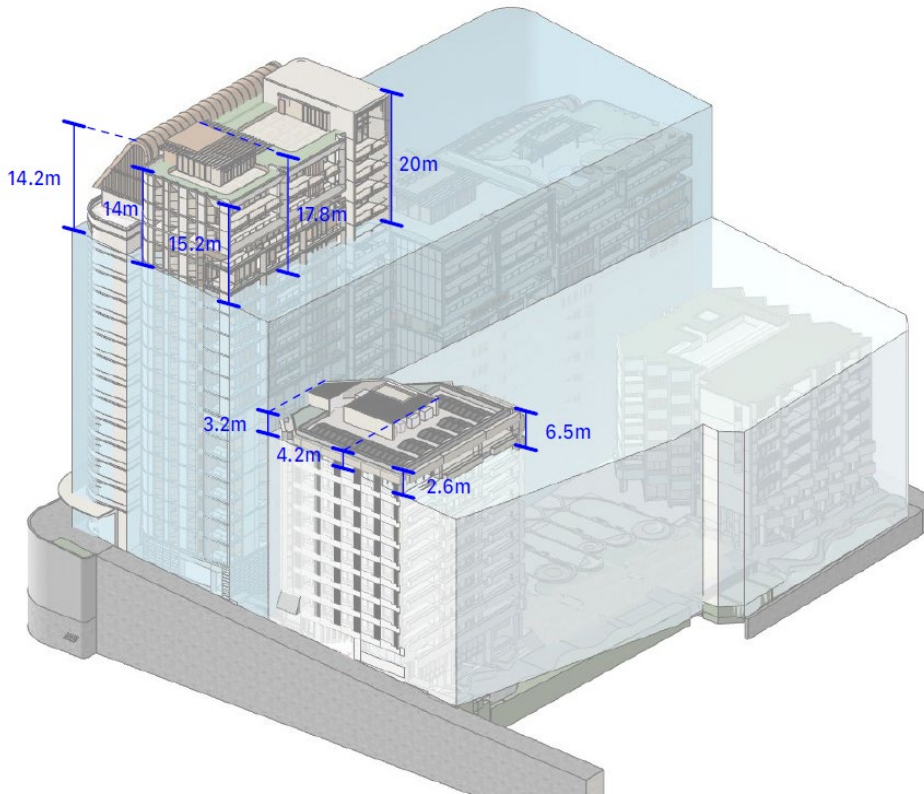
Source: FJC

Figure 6: Proposed Building Height Comparative to the Height Plane



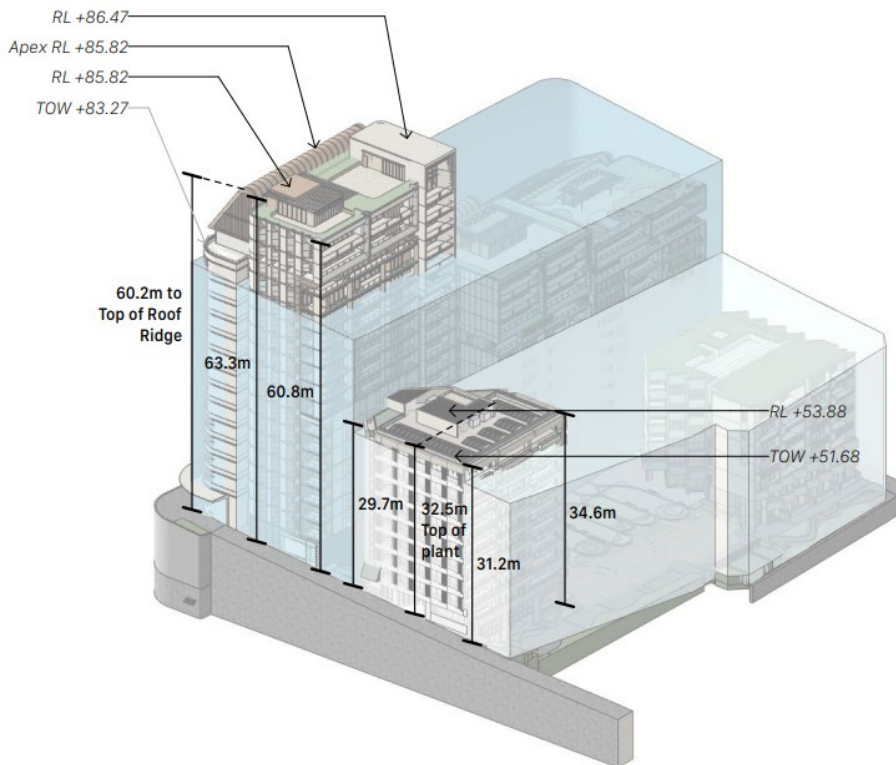
Source: FJC

Figure 7: Proposed Building Height Comparative to the Height Plane (Breach)



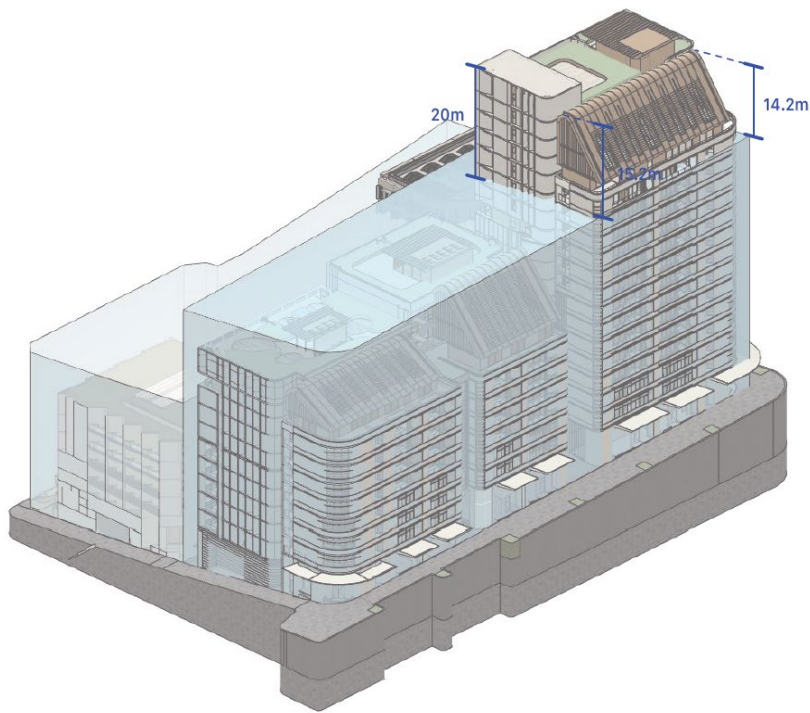
Source: FJC

Figure 8: Proposed Building Height Comparative to the Height Plane



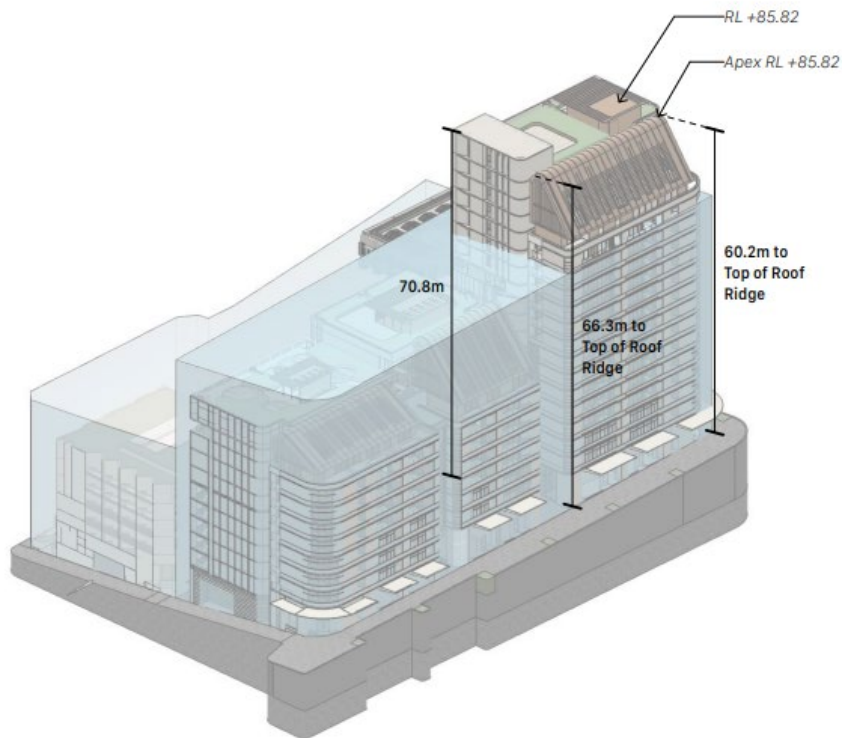
Source: FJC

Figure 9: Proposed Building Height Comparative to the Height Plane (Breach)



Source: FJC

Figure 10: Proposed Building Height Comparative to the Height Plane



Source: FJC

## 4. Assessment of Clause 4.6 Variation

The following sections of the report provide a comprehensive assessment of the request to vary the numeric height of building control pursuant to the Housing SEPP.

Detailed consideration has been given to the following matters within this assessment:

- *Varying development standards: A Guide*, prepared by the Department of Planning and Infrastructure dated August 2011.
- Relevant planning principles and judgements issued by the Land and Environment Court.

### 4.1. Is the planning control a development standard that can be varied?

The maximum building height prescribed by clause 4.3 of SLEP 2012 is a development standard that can be varied under clause 4.6(2) of SLEP 2012. Since clause 4.6(2) applies to development standards imposed by the LEP or any other environmental planning instrument, the height provisions of the Housing SEPP are also recognised as development standards for the purposes of clause 4.6.

The proposed variation is not excluded from the operation of clause 4.6(2) as it does not fall under any of the matters listed in clause 4.6(6) or clause 4.6(8) of SLEP 2012.

### 4.2. How is Compliance with the Development Standard Unreasonable or Unnecessary in the Circumstances of the Particular Case?

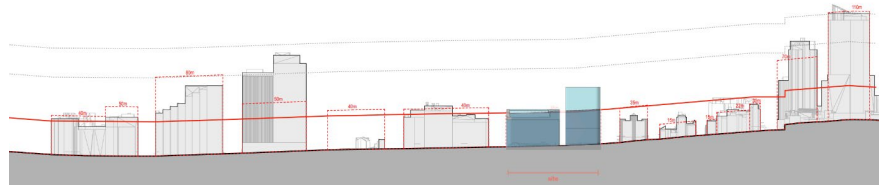
**Table 2** below section addresses both the objectives of the infill affordable housing provisions of the Housing SEPP and the objectives of the height of buildings development standard within the SLEP.

Table 2: Variation Justification

Key Questions	Response
a) Are the objectives of the development standard achieved notwithstanding the non-compliance?	<p><b><u>Objective of Part 2, Division 1 of the Housing SEPP</u></b>  <b><i>15A the objective of this division is to facilitate the delivery of new infill affordable housing to meet the needs of very low, low and moderate income households.</i></b></p> <p>The proposal dedicates 15% of the total GFA as affordable housing, which equates to 60 residential apartments or 26% of the overall residential yield. As the site contains a mix of residential and retail GFA, a significant proportion of uplift is dedicated to affordable housing.</p> <p>The affordable housing component has been carefully designed to ensure high levels of amenity and a variety of apartment typologies that will meet the expected needs of the future tenants.</p> <p>The applicant has worked closely with Bridge Housing to determine the location and dwelling type that best suits their needs. The development facilitates the delivery of affordable housing within direct proximity to health, education and other key employment nodes within the Potts Point and CBD area and provides residents with a high level of amenity.</p> <p><b><u>Objectives of Clause 4.3 of the SLEP</u></b></p> <p>(a) <i>to ensure the height of development is appropriate to the condition of the site and its context,</i></p> <p>The proposed building height of 70.8metres is appropriate in the context of the site and its surrounds. The site is located on William Street, a key arterial route connecting the Sydney CBD to Potts Point, which is characterised by a highly varied built form and a broad range of building heights.</p>

Along the William Street corridor, the built form transitions from taller towers in Potts Point (up to 110m) through to mid-rise development in the vicinity of the CBD (around 40m). The proposed building height sits comfortably within this spectrum, acting as a transitional scale between the higher density-built form of Potts Point and the lower height buildings closer to the CBD.

Figure 11: Local Context



As demonstrated in the above image, the proposed built form with an increased building height reinforces the established urban character of William Street as a high-density mixed-use corridor. The scale complements the surrounding built environment without overwhelming the public domain.

The urban form and scale reduce in height towards the Woolloomooloo at the north. As such, the built form positions the two smaller scale buildings to this frontage. This strategic massing allows for an appropriate transition from William Street to Woolloomooloo village.

- (b) *to ensure appropriate height transitions between new development and heritage items and buildings in heritage conservation areas or special character areas,*

The site does not contain any listed heritage items, nor is it within the boundaries of any Heritage Conservation Area (HCA). The site is however, located adjacent to a HCA of local significance and within the vicinity of listed heritage items and HCAs.

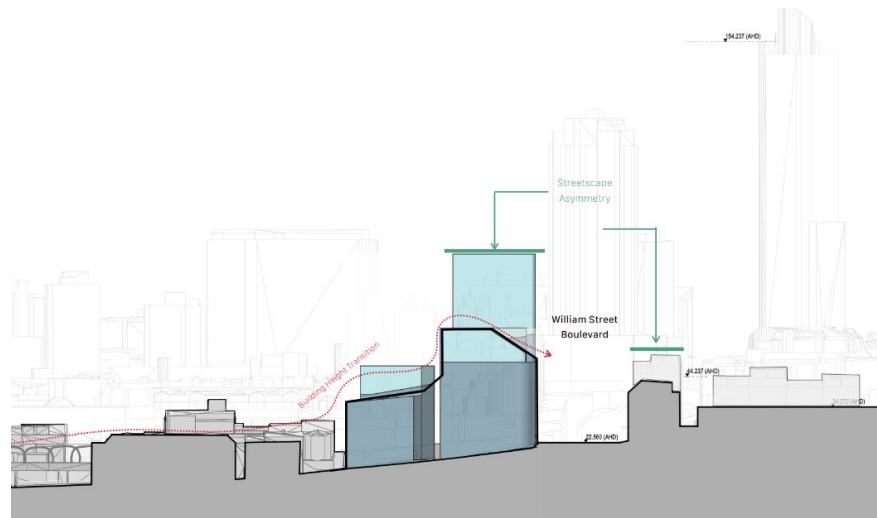
With respect to potential impacts on the heritage items and HCAs in the vicinity of the site, the Heritage Impact Statement (HIS), prepared by Urbis (**Appendix PP**) found that there would be no significant impact on their established character and heritage significance as a result of the proposal or proposed building heights.

The HIS concludes that the scheme, has been subject to rigorous design testing including a Design Excellence process and has been resolved in a manner which, sufficiently mitigates potential adverse impacts on those listed items and HCAs in the vicinity.

In particular, it is considered that the proposed envelope and massing demonstrates a considered response to the Woolloomooloo HCA, which directly adjoins the site to the north, namely as a result of the transition in building heights stepping down from the higher William Street East and West buildings to the lower Dowling Street and Forbes Street buildings adjoining the HCA to the north of the site. The HIS concludes that this type of uplift is to be expected on a site that is not within the HCA but fronts a commercial street.

Ultimately, the design has been strategically development to deliver a built form and massing solution that transitions down to the HCAs that adjoin.

Figure 12: Built Form Context



(c) *to promote the sharing of views outside Central Sydney,*

The site is located outside of Central Sydney and within a sensitive visual catchment. In preparing the building envelope much regard was given to the surrounding views from private residents to the south, southeast and east of the site. The proposed development will inevitably increase the built form relative to the current concept approval. Under the existing consent, the buildings across the site have approved maximum heights of 6 storeys within the northeast and 10 storeys along William Street.

The proposed development includes building heights of 9 storeys within the north-east, retaining the 10-storey component along the western part of William Street, with the eastern edge increasing in height to 18 storeys.

Overall, the proposed additional building height and massing has been sensitively and skilfully located on the site to enable view sharing across the site. This has been a key driver which has led to the relocation of mass from the western parts of the site to the eastern parts of the site, triggering the built form in those locations to exceed the height limit, in favour of promoting views across the site.

The below image demonstrates how the massing has been strategically positioned with respect to the surrounding developments to the south and southeast (in green).

Figure 13: Built Form and View Sharing



The portions of the building that exceed the height limit are therefore limited to the eastern two built forms referred to as the Dowling Street building, and the William Street East building. These are described as follows.

#### **Dowling Street Building**

View impacts associated with the non-compliance for this building are largely confined to those views from lower apartments to the southwest of the site, including 200 William Street.

Notably the Dowling Street building only marginally exceeds the height limit on the northeastern corner which presents to the streetscape. This northeastern interface exceeds the building height control by 2.6 metres, 4.2 metres and 3.2 metres toward William Street. The northwestern corner and top of plant exceed the height controls by 6.5m and 5.3m respectively. When viewed externally, the greatest exceedances are localised internally to the site and therefore unlikely to impact beyond the site.

The proposal is supported by a Visual Impact Assessment (**VIA**) undertaken by Urbaine (**Appendix S**). The visual impacts of the proposal were analysed from key viewpoints within the public domain. From a view sharing perspective, the VIA, reveals that the development has adopted a skilful design approach by lowering the building heights to the western periphery of the site. In the case of the Dowling Street building, the relocation of increased volume to the east impacts, for the most part, upon sky view only. The view analysis reveals that there is no significant introduced impact on views as a result of the uplift to the Dowling Street building.

With respect to 200 William Street, a static, private virtual view assessment has been undertaken. This review confirms that the portion of the building that is above the height plane results in no additional impact to iconic or scenic views and impacts sky views only.

The impact associated with the height breach for the Dowling Street building is not considered to significantly impact on the surrounding environment. The development demonstrates equitable view sharing under the tenacity principals and as such, the increased uplift to this building is considered most appropriate when retaining views to the Opera House and Harbour Bridge.

#### **William Street East Building**

The William Street East building proposes a maximum height of 18 storeys at the southeastern corner of the site. At its highest point, the building exceeds the LEP height control by up to 20 metres, with the extent of this exceedance generally located toward the internal interface of the site. To William Street, the non-compliant portion presents a maximum breach of 15.2 metres.

The variation to the height control has been carefully considered within the overall design approach, which seeks to balance increased height at the eastern end of the site with a deliberate lowering of building forms at the western end. This strategy ensures that the development preserves key harbour view lines from the west, while consolidating additional height in a location where impacts are limited.

The VIA confirms that the additional height beyond the permitted height to the William Street East building will not result in the loss of any iconic views. The impacts are limited to small areas of distant foreshore and sky view, as well as minor portions of Potts Point and sky views rather than significant view loss to iconic views such as the Opera House or Harbour Bridge. Importantly, by transferring the height from the west to the east of the site, the development is able retain views to iconic items, including but not limited to the following apartments:

- Level 8, 'Horizon', No.184, Forbes Street, Darlinghurst.
- Level 6, Palisades, Nos.5-15 Farrell Avenue. Northern tower.
- Level 7, Palisades, Nos.5-15 Farrell Avenue. Northern tower.
- Level 9, Palisades, Nos.5-15 Farrell Avenue. Northern tower.

Key Questions	Response
	<p>Having regard to the broader character of William Street and its surrounding environment, the non-compliant elements will not appear inconsistent with the existing or future built form context. The proposed design outcome appropriately manages view sharing and demonstrates a sensitive urban response, ensuring that no unacceptable visual or amenity impacts will arise as a result of the increased building height.</p> <p>For a complete assessment please refer to <b>Appendix S</b>.</p> <p>(d) <i>to ensure appropriate height transitions from Central Sydney and Green Square Town Centre to adjoining areas,</i></p> <p>Not Applicable, the site is not located in Central Sydney or Green Square under the Locality and Site Identification Map.</p> <p>(e) <i>in respect of Green Square</i></p> <p>Not Applicable, the site is not located in Green Square under the Locality and Site Identification Map.</p>
b) Are the underlying objectives or purpose of the development standard not relevant to the development? (Give details if applicable)	Not Applicable
c) Would the underlying objective or purpose be defeated or thwarted if compliance was required? (Give details if applicable)	Not Applicable
(d) Has the development standard been virtually abandoned or destroyed by the council's own actions in granting consents departing from the standard?	Not Applicable
e) Is the zoning of the land unreasonable or inappropriate so that the development standard is also unreasonable or unnecessary?	Not Applicable

As demonstrated above, the objectives of the infill affordable housing provisions of the Housing SEPP and the SLEP height of buildings development standard are achieved notwithstanding the proposed contravention.

## 8. Are There Sufficient Environmental Planning Grounds to Justify Contravening the Development Standard?

There are sufficient environmental planning grounds to justify contravening the development standard:

- The non-compliant building height is a direct result of transferring building height and floor space from parts of the site to another in order to protect solar access and retain key views for surrounding apartments. This is a deliberate move to enable the delivery of affordable housing on the site, whilst protecting important amenity elements. In this, the shift in massing is considered reasonable to preserve the existing amenity as best possible.
- From a built form a visual perspective, the DIP “commended the design team on the overall massing and noted that incorporating the additional uplift on a complex site is a challenging exercise. The DIP stated that the massing strategy was well considered and demonstrated a crafted response that enabled additional height whilst considering the external impacts.”

- The variation to the height limit is limited to the upper levels of Dowling Street and William Street East buildings. From a view sharing perspective, the VIA consultant has determined that the variation will not result in adverse or unacceptable view loss impacts. Moreover, the design demonstrates a skilful and considered approach to balancing the increased 30% uplift whilst retaining key views and amenity to surrounding residents.
- FJC have modelled the additional overshadowing from the non-compliant component, with a detailed assessment of residential properties to the south. The analysis confirms that most affected properties will continue to receive 2 hours of solar access in mid-winter. Across the uplift, only 6 apartments at 184 Forbes Street are impacted, with 88% of dwellings still achieving the required 2 hours. Accordingly, the height variation does not result in additional non-compliance in regard to overshadowing.
- Overall, it is considered that the variation to the height limit produces a better outcome than that of a compliant development as it:
  - Retains solar access to the dwellings to the south of the site.
  - Provides for diversity in the height of towers which results in a greater transition and improved urban design outcomes
  - Aligns with the tenacity principals demonstrating skilful design and appropriate view sharing.
  - Maintains the design integrity elements of the winning design excellence competition
  - Results in limited additional external amenity impacts, beyond that of a compliant envelope.

For these reasons it is deemed that there are sufficient environmental planning grounds to justify the contravention to the development standard.

### **4.3. Has the Written Request Adequately Addressed the Matters in Sub-Clause (3)?**

Clause 4.6(3) states that development consent must not be granted for development that contravenes a development standard unless the consent authority is satisfied that the applicant's written request has adequately addressed the matters required to be demonstrated by subclause (3).

Each of the sub-clause (3) matters are comprehensively addressed in this written request, including detailed consideration of whether compliance with a development standard is unreasonable or unnecessary in the circumstances of the case. The written request also provides sufficient environmental planning grounds, including matters specific to the proposal and the site, to justify the proposed variation to the development standard.

## 5. Conclusion

This request demonstrates that strict compliance with the maximum building height control under Clause 4.3 of the SLEP 2012, as varied by Clause 16(3) of the Housing SEPP, is unreasonable and unnecessary in the circumstances. The proposed building heights have been carefully designed to deliver a balanced built form outcome that better achieves the objectives of the height standard than a strictly compliant scheme.

The proposed variation is reasonable for the following key reasons:

- The additional height has been deliberately concentrated to the eastern portion of the site, where taller built form is contextually appropriate along William and Dowling Streets, while the development scales down to the north to achieve a sensitive transition to the Woolloomooloo village and nearby heritage context.
- A compliant envelope would result in greater bulk and amenity impacts, whereas the proposed massing redistributes height to preserve solar access, minimise overshadowing, and enable equitable view sharing.
- The extent of exceedance is limited to the upper levels of two buildings and does not result in any unacceptable adverse impacts on neighbouring properties or the public domain.
- The proposal has been endorsed through the Design Integrity Panel process as a considered and skilful design response to a complex site.

On this basis, the variation is well founded and consistent with the objectives of both the Housing SEPP and the SLEP 2012 height control. It produces a superior planning and design outcome to strict compliance, and it is therefore appropriate that flexibility be granted in the application of the height development standard.

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