

The URBIS logo is located in the top right corner. It consists of the word "URBIS" in a bold, white, sans-serif font, enclosed within a white rectangular border that is slightly offset from the top and right edges of the page.

URBIS

The background of the entire page is a high-quality architectural rendering of a modern residential building. The building features a curved facade with a light-colored, textured material, possibly concrete or stone. It has multiple levels of balconies with glass railings, and large windows that reflect the surrounding environment. The building is set on a street corner, with a sidewalk and a road visible in the foreground. Several people are walking on the sidewalk, and a few cars are parked along the street. The sky is a clear, light blue.

ENVIRONMENTAL IMPACT STATEMENT

**164–172 AND 174–194 WILLIAM
STREET, WOOLLOOMOOLOO**

PREPARED FOR
WILLIAM STREET RESIDENTIAL PTY LTD
OCTOBER 2025

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Project Code	P0036191
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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

Acknowledgement 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.

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EIS Declaration

Project Details

Project Name Bayswater

Application Number SSD-80211463

Address 164-172 and 174-194 William Street, Woolloomooloo

Applicant details

Applicant Name William Street Residential Pty Ltd

Applicant Address Suite 4, Level 8, 14 Martin Place, Sydney NSW 2000

Environment Impact Statement (EIS) prepared by

Name	Andrew Harvey Director	Sophy Purton Director	Jasmine Foster Consultant
Qualification	Bachelor of Planning (First Class Honours) – University of New South Wales	Bachelor of Urban Development (Honours) - Queensland University of Technology	Bachelor of Urban Development (Honours) (Urban and Regional Planning) (Queensland University of Technology)

Declaration

Name Andrew Harvey

Qualification Bachelor of Planning (UNSW) Hons; Registered Environmental Assessment Planner (REAP)

Registration Number 73066

Organisation Registered With Planning Institute of Australia

The undersigned declares that this EIS:

- has been prepared in accordance with Part 8 Division 5 of the *Environmental Planning and Assessment Regulation 2021*.
- contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates.
- does not contain information that is false or mis-leading;
- addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project.
- identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments.
- has been prepared having regard to the Department's *State Significant Development Guidelines - Preparing an Environmental Impact Statement*.
- contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development.
- contains a consolidated description of the project in a single chapter of the EIS;
- contains an accurate summary of the findings of any community engagement; and
- contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.

Project Details

Signature



Andrew Harvey (REAP)
24 September 2025

Glossary and Abbreviations

Reference	Description
ACHAR	Aboriginal Cultural Heritage Assessment Report
ACM	Asbestos Containing Material
AEP	Annual Exceedance Probability
AHD	Australia Height Datum
AHIMS	Aboriginal Heritage Information Management System
AIA	Arboricultural Impact Assessment
ANEF	Australian Noise Exposure Forecast
AQIA	Air Quality Impact Assessment
ARI	Average Recurrence Interval
ASS	Acid Sulphate Soils
BAM	Biodiversity Assessment Method
BC Act	Biodiversity Conservation Act 2016
BC Reg	Biodiversity Conservation Regulation 2017
BCA	Building Code of Australia
BDAR	Biodiversity Development Assessment Report
CBD	Central Business District
CEEC	Critically Endangered Ecological Community
CDA	Concept Development Application
CEMP	Construction Environmental Management Plan
CMP	Construction Management Plan
COPC	Contaminants of Potential Concern
CTMP	Construction Traffic Environmental Plan
CWC	Connecting with Country
DCP	Development Control Plan
DP	Deposited Plan
DPHI	New South Wales Department of Planning, Housing and Infrastructure
DSI	Detailed Site Investigation
EDC	Estimated Development Cost

Reference	Description
EIS	Environmental Impact Statement
EP&A Act	Environmental Planning and Assessment Act 1979
EPA Regulation	Environmental Planning and Assessment Regulation 2021
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
EIS	Environmental Impact Statement
EPA	New South Wales Environment Protection Authority
EPI	Environmental Planning Instrument
ESCP	Erosion and Sediment Control Plan
ESD	Ecologically Sustainable Development
GANSW	Government Architect New South Wales
GFA	Gross Floor Area
GTP	Green Travel Plan
HIPAP	Hazardous Industry Planning Advisory Paper
HIS	Heritage Impact Statement
LAeq	A frequency-weighted Equivalent Continuous Sound Level
LEC	Land Environment Court New South Wales
LEP	Local Environmental Plan
LGA	Local Government Area
LSPS	Local Strategic Planning Statement
MNES	Matters of National Environmental Significance
MUSIC	Model for Urban Stormwater Improvement Conceptualisation
NML	Noise Management Level
NRAR	Natural Resource Access Regulator
NSW	New South Wales
NVIA	Noise and Vibration Impact Assessment
OEMP	Operational Environmental Management Plan
R&H SEPP	State Environmental Planning Policy (Resilience and Hazards) 2021
PAD	Potential Archaeological Deposit
PBP	Planning for Bushfire Protection
PCT	Plant Community Type

Reference	Description
PMF	Probable Maximum Flood
POM	Plan of Management
PSI	Preliminary Site Investigation
Planning Systems SEPP	State Environmental Planning Policy (Planning Systems) 2021
SAII	Serious and Irreversible Impacts
SARs	Commonwealth Supplementary Assessment Requirements
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SIA	Social Impact Assessment
SIDRA	Signalised & Unsignalised Intersection Design and Research Aid
Site	<legal description>
SSD	State Significant Development
SSDA	State Significant Development Application
T&I SEPP	State Environmental Planning Policy (Transport and Infrastructure) 2021
TfNSW	Transport for New South Wales
TIA	Traffic Impact Assessment
UXO	Unexploded Ordnance
VIA	Visual Impact Assessment
VIS	Vegetation Integrity Score
WSAP	Western Sydney Aerotropolis Plan
WSAPP	Western Sydney Aerotropolis Precinct Plan
WCM	Water Cycle Management
WMP	Waste Management Plan
WSUD	Water Sensitive Urban Design
WWTP	Wastewater Treatment Plant

Executive Summary

This Environmental Impact Statement (**EIS**) has been prepared by Urbis Ltd (**Urbis**) on behalf of William Street Residential Pty Ltd (**the applicant**). The EIS is submitted to the NSW Department of Planning, Housing and Infrastructure (**DPHI**) in support of a State Significant Development Application (**SSDA**) for the site at 164-172 and 174-194 William Street, Woolloomooloo (**the site**).

The site is located on Gadigal Country, and we acknowledge the Gadigal people, their elders past and present and their deep and continuing connection to their land. In preparing this EIS we acknowledge the importance of a Country-centred approach to the design, guided by Aboriginal people, who know that if we care for Country, Country will care for us.

The application seeks development consent for an SSDA which will transform the site into a vibrant mixed-use precinct, consistent with the outcomes of the design excellence competition, whilst introducing new, in-fill affordable housing in accordance with the provisions under the *State Environmental Planning Policy (Housing) 2021* (**Housing SEPP**).

This report has been prepared in response to the Secretary's Environmental Assessment Requirements (**SEARs**) dated 21 February 2025, issued for the project (DPHI Reference: SSD-80211463). This EIS outlines the site and proposed development, provides relevant background information, and evaluates the development against relevant legislation, environmental planning instruments, planning policies, and the issued SEARs.



Objectives

The key objectives of the proposed development are to:

- Deliver high-quality housing, including affordable units, to boost local supply and affordability.
- Achieve design excellence while respecting Woolloomooloo's context and minimising amenity impacts.
- Create active street frontages with a mix of retail and residential uses to enhance vibrancy and walkability.
- Support convenient access to employment, education, and daily needs by leveraging proximity to Kings Cross Station.
- Improve local connectivity and public domain outcomes with enhanced pedestrian access and streetscape activation.

Project Highlights



Deliver 227 new homes across four buildings, including 60 affordable rental units (26.4% of the apartments).



Highly activated public domain with a publicly accessible park, a new laneway and through-site links.



Four levels of basement car parking with 340 spaces.



Retail floor space, rooftop communal areas and public art that enhances the precinct.



Strategically designed built form and massing, that skilfully responds to the urban context.

Justification of the Project

The proposed development aligns with the evolving local character of Woolloomooloo and respects the area's rich heritage. The thoughtful design provides a public domain outcome that integrates seamlessly with the urban environment and enhances public spaces through the provision of strategic through-site links and publicly accessible greenspace. This project supports the Housing SEPP by contributing to housing diversity and urban renewal in a well-served part of Woolloomooloo.

The development includes 60 affordable housing dwellings, which constitutes 26.4% of the overall dwelling yield. This supports advancing the NSW Government's housing policy objectives. These dwellings will be available to moderate-income households, enabling them to live closer to employment opportunities, educational and health institutions and be within walking distance of rapid transport connections and the Sydney CBD. Ultimately, delivering a substantial quantum of affordable housing in this location, has an intrinsic benefit on the wider community and workforce.

Consistent with the Department of Planning, Housing and Infrastructure's 'In-fill Affordable Housing Practice Note' (December 2023), this proposal balances the need for affordable housing with the site's amenity and its surroundings. The design is sensitive to the existing context while contributing positively to the evolving character of Woolloomooloo.

The key issues identified within the SEARs have been thoroughly assessed in Section 6 of the EIS. This assessment, informed by specialist reports, includes recommendations and mitigation measures to ensure the project does not result in unreasonable or adverse environmental impacts. The likely impacts can either be positive or appropriately mitigated.

This SSDA has significant merit and should be approved, subject to the implementation of the mitigation measures outlined in this report. This development represents a forward-thinking approach to urban renewal and affordable housing in Woolloomooloo.

1. Introduction

This Environmental Impact Statement (**EIS**) has been prepared by Urbis Ltd (**Urbis**) on behalf of William Street Residential Pty Ltd (**the applicant**). The EIS is submitted to the NSW Department of Planning, Housing and Infrastructure (**DPHI**) in support of a State Significant Development Application (**SSDA**) for the site at 164-172 and 174-194 William Street, Woolloomooloo (**the site**). The applicant details for the proposal are listed below:

Table 1: Applicant Details

Proponent	William Street Residential Pty Ltd
Postal Address	Suite 4, Level 8, 14 Martin Place, Sydney NSW 2000
ACN	684 567 182
Nominated Contact	John Fitzgerald, Rebel Property 02 9235 7800 JFitzgerald@rebelproperty.com

1.1. The Project

This EIS is submitted to DPHI on behalf of the Applicant in support of an application for SSD-80211463 at the site. Specifically, the SSDA seeks 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 has been made under Chapter 2, Part 2, Division 1 of the Housing SEPP as the proposal includes more than 10% affordable housing and is located within an accessible area, as set out in **Section 4**.

The proposal will include 15% gross floor area 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 J** for further information regarding Bridge Housing (ABN 55 760 055 094), the chosen community housing provider.

1.2. Project Background

1.2.1. Concept Development Application

On 7 December 2023, the Central Sydney Planning Committee (CSPC) approved the Concept Development Application (Ref: D/2022/139) for the following:

- Concept building envelope up to a maximum height of RL57.9 (33.4 metres) for a future mixed-use development including:
 - In-principle demolition of existing structures and excavation for 3 basement levels;
 - Indicative construction of three new buildings of 5, 6 and 10 storeys in height respectively, separated by a pedestrian laneway and through-site links and vehicle access from Forbes Street; and
 - Indicative land uses including basement car parking, storage and services, ground floor retail, commercial and residential uses on upper floors.

Deferred Commencement was granted on the basis of the execution and registration of a Voluntary Planning Agreement (VPA). The VPA has since been registered on title, with the consent becoming operational on 8 April 2024. Further details on the VPA are provided in **Section 2.3** of this EIS.

1.2.2. Competitive Design Alternatives Process (Competitive Process)

Following the approval of the Concept DA, the applicant undertook a Competitive Design Alternatives Process. The process was overseen and endorsed by the City of Sydney (CoS) Council, with Urbis Ltd as the competition managers.

Table 2: Design Competition Representatives

CoS Representatives	Client Representatives
Kerry Clare (Clare Design) – Selection Panel Chair	Chi Melhem (EMBECE)
Emili Fox (Architectus)	Allen Linz (Rebel Property Group)

The design competition was held on 27 May 2024, with four competing architects. The scheme by FJC studio, Studio Bright, and Tribe Studio was selected as the winner of the Competitive Design Alternatives Process as their design best exhibited the potential for achieving design excellence.

The key design principles and qualities of the competition, that should be retained, are provided below:

- *The positioning and scale of the publicly accessible, privately owned park as it improves the quality and amenity of the public domain. Especially regarding:*
 - *Its north-facing orientation on site.*
 - *Provision of solar access to the ground plane and William Street building.*
 - *Increased view-sharing from the William Street building.*
 - *Transfer of building envelope to create space for the park.*
- *The design and landscaping of the publicly accessible, privately owned park.*
- *The indicative ground plane area remains open to the sky.*
- *The alignment of the north-south through-site link with a view that the south-western built form aligns with the heritage building on the southern side of William Street.*
- *Realignment of the eastern portion of the east-west through-site link, to line up with Brougham Lane.*
- *Active street frontages along William Street and the publicly accessible, privately owned park are not to be compromised by required services and exhaust grills.*

- *Maintenance of the active ground plane. Especially with regard to the retail laneway and the privately owned, publicly accessible park.*
- *Angled façade treatment to facilitate adequate visual privacy of the northern façade of the William Street buildings where it directly interfaces with the southern edge of the Dowling and Forbes Street buildings. This is considered a suitable design response that preserves privacy but enables solar access and ventilation to be achieved.*
- *Diversity of apartment typologies and the fine grain of the Dowling Street and Forbes Street buildings.*
- *Diversity of the design team (collaboration between Tribe Studio, Studio Bright, and FJC).*
- *Communal facilities in each building (including rooftop space).*
- *Covered through-link in the William Street building with escalators.*
- *Incorporation of Connecting to Country principles.*
- *Access to natural light and ventilation to residential apartments.*
- *Retention of the recessed bands (or similar) at level 6 / 7 of the northern portion of the William Street building. This provides for a solid and visible break and provides a clear separation in building form for the upper levels.*
- *Apartment layouts that support the recessed bands in the upper levels of the William Street buildings.*
- *Materiality, detailing and textures of the Dowling Street and Forbes Street buildings as they are appropriate for the building types and location. In particular, the recycling of materials, where appropriate, for the north-east building.*
- *Imbedded public art in the design of the scheme.*

In addition to the key elements for retention, the Panel recommended further refinement and resolution of the competition scheme. These largely related to materiality, floor to floor heights, internal apartment layouts and commentary around the new internal park.

1.2.3. Consultation with the City of Sydney

Following the conclusion of the competition process, the Applicant and project team engaged with the CoS through two pre-lodgement meetings, held on 1 August and 2 September 2024.

Council representatives included those from the planning and urban design teams and focused on the transition from the approved concept DA to the forthcoming detailed design application. The architect presented the refined competition scheme, demonstrating how they had addressed the Panels feedback.

Council provided preliminary feedback on level transitions, public domain accessibility, and consistency with the approved concept envelope. The CoS also outlined key considerations for the detailed DA, including requirements for technical reporting, further view impact analysis, vehicular access arrangements, rooftop treatment, and clarification of proposed building heights where variations from the concept envelope occur.

The feedback received through this engagement has informed the ongoing design development and has been integrated into the SSDA to ensure alignment with Council objectives.

1.2.4. Infill Affordable Housing SSDA

In December 2023, the DPHI gazetted amendments to the Housing SEPP which enable developers to obtain up to 30% increase in height and floor space, providing that the development delivers 15% of the overall GFA as affordable housing for a period of 15 years, to be managed by a registered Community Housing Provider (CHP).

As the site is located within walking distance to heavy rail, the CBD, hospitals, schools and other service jobs, it is ideally positioned to support key workers. The size of the site in this inner-city location, has the capacity to provide 60 apartments of diverse sizes, to be dedicated as affordable housing. The applicant met with the DPHI on various occasions between December 2024 and January 2025, before SEARs were issued on 21 February 2025.

The project team discussed transitioning the development from the current process into a State significant application, commensurate with the Housing SEPP. As the project had successfully completed a design competition process, the Government Architect NSW endorsed a Bridging Design Excellence Strategy in April 2024. This enabled the project to continue on through the design excellence process, in lieu of commencing a new competition.

The Design Integrity Panel (**DIP**) was established and the bridging design excellence process was conducted from April to July 2025, involving Rory Toomey (GANSW), Kerry Clare (Clare Design), and Chi Melhem (EMBECE).

Through that process, the DIP requested further consideration of amenity impacts, massing options, public domain, ground plane, equitable access, and safe movement. The DIP also raised concern around materiality, architectural outcomes, affordable housing distribution, solar access, and thermal performance, which were tested and resolved through the DIP process.

In July 2025, 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 DIP is supportive of progressing the building envelope massing as presented to the formal lodgement of the SSDA.

1.2.5. Related Development

As noted above, a Concept DA has been approved over the site and a DEC process has been undertaken in accordance with the design competition brief.

It is acknowledged that the winning scheme results in a number of non-compliances with the concept envelope, in terms of building footprints and site layout. This is largely a result of the introduction of a publicly accessible central park that formed part of the winning scheme.

Ordinarily, the application would be required to amend the Concept DA prior to consent being granted for the Detailed DA. However, as set out in Section 2.10(2) of the State Environmental Planning Policy (Planning Systems) 2021 (**Planning Systems SEPP**), the requirement for a DCP/Concept DA does not apply to SSD applications.

Amendments to the Planning Systems SEPP were introduced on 2 December 2022 to streamline the delivery of SSD projects. The provisions of the Planning Systems SEPP would apply to any future SSDA on the subject site, and a Concept DA will not be required ahead of a detail SSDA submission.

Therefore, rather than amending the Concept DA, the applicant seeks to relinquish the Concept DA, as part of conditions of consent for the SSDA.

1.3. Restrictions and Covenants

The certificate of title for the site lists the relevant easements and dealings that apply to the site. These matters are detailed in **Table 3** with the proposed action listed against each. These are also detailed in the Survey Plan at **Appendix K**.

Table 3: Restrictions and Covenants

Reference	Description	Action
(A)	Right of carriageway (1281774)	To be extinguished once the site is amalgamated.
(B)	Easement for rock anchors 1.2m wide (9597264)	This easement relates to the Cross City Tunnel which sits below the William Street footpath. The upper level of the easements are at RL 2.315 – RL 6.27. These easements are to be retained and have been considered in the design of the proposed basement levels (from levels 2 onwards).
(C)	Easement for rock anchors 4.865m wide (9597264)	This easement relates to the Cross City Tunnel which sits below the William Street footpath. The upper level of the easements are at RL 2.315 – RL 6.27. These easements are to be retained and have been considered in the design of the proposed basement levels (from levels 2 onwards).

Reference	Description	Action
(D)	Easement for electricity and other purposes (X893466)	This easement relates to the existing substation. This easement will be relocated to reflect the location of the new substation, which is situated adjacent to and with access from Judge Lane.
(E)	Right of way (X839466)	This easement related to access to the existing substation. This easement will be relocated to reflect the location of the new substation.

1.4. Project Team and Supporting Documentation

The EIS should be read together with the architectural, landscape, civil engineering plans and supporting technical documentation submitted with the SSDA under separate cover as per **Table 4** below.

Table 4: Project Team

Consultant Report	Prepared By	Appendix
SEARs Requirements	Urbis	Appendix A
Architectural Drawings	FJC, Studio Bright, Tribe Studio	Appendix B
Statutory Compliance Table	Urbis	Appendix C
Mitigation Measures Table	Urbis	Appendix D
Engagement Summary Table	Urbis	Appendix E
Clause 4.6 Variation Report (Height)	Urbis	Appendix F
Clause 4.6 Variation Report (FSR)	Urbis	Appendix G
Quantity Surveyor Report	WTP Australia Pty Ltd	Appendix H
Crime Prevention Through Environmental Design Report (CPTED)	Urbis	Appendix I
Community Housing Provider Letter	Bridge Housing	Appendix J
Survey Plan	LTS	Appendix K
Urban Design Report	FJC, Studio Bright, Tribe Studio	Appendix L
Bridging Design Excellence Strategy	Urbis	Appendix M
Design Competition Report	Urbis	Appendix N
Natural Ventilation Report	Flux Consultants	Appendix O
Connecting with Country Report	Bangawarra	Appendix P
Engagement Outcomes Report	Urbis	Appendix Q
Accessibility Report	Jensen Hughes	Appendix R
Visual Impact Assessment	Urbaine Design Group	Appendix S
Transport Impact Assessment, including: - Preliminary Construction Traffic Management Plan - Green Travel Plan	TTPP	Appendix T

Consultant Report	Prepared By	Appendix
BASIX Certificate	Green Perch	Appendix U
NatHERs Certificate	Green Perch	Appendix V
Noise and Vibration Impact Assessment	Renzo Tonin & Associates	Appendix W
Integrated Water Management Plan	TTW	Appendix X
Geotechnical Assessment	Douglas Partners	Appendix Y
Groundwater Impact Assessment	Douglas Partners	Appendix Z
Public Art Strategy	FJC	Appendix AA
Pedestrian Wind Assessment	CPP Wind Engineering Consultants	Appendix BB
Detailed Site Investigation	Douglas Partners	Appendix CC
Remedial Action Plan	Douglas Partners	Appendix DD
Landscape Plans	FJC	Appendix EE
Landscape Design Report	FJC	Appendix FF
Arborist Report	Dr Treegood	Appendix GG
Ecologically Sustainable Development Report	Green Perch	Appendix HH
Section J Analysis Report	Green Perch	Appendix II
Biodiversity Development Assessment Report (BDAR) Waiver Request	Ecological	Appendix JJ
Biodiversity Development Assessment Report (BDAR) Waiver	DPHI	Appendix KK
Operational Waste Management Plan	Elephants Foot	Appendix LL
Design Integrity Panel Report	Urbis	Appendix MM
Social Impact Assessment	Urbis	Appendix NN
Flood Impact and Risk Assessment	TTW	Appendix OO
Heritage Impact Statement	Urbis	Appendix PP
Historical Archaeological Assessment	Urbis	Appendix QQ
Historical Archaeological Research Design & Excavation Methodology	Urbis	Appendix RR
Aboriginal Objects Due Diligence	Urbis	Appendix SS
Fire Concept Strategy	Norman Disney & Young (NDY)	Appendix TT
Building Code of Australia Assessment Report	Jensen Hughes	Appendix UU
BASIX Stamped Plans	Green Perch	Appendix VV
Embodied Emissions Materials Form	Green Perch	Appendix WW

Consultant Report	Prepared By	Appendix
Notice of Determination Concept Development Application	City of Sydney	Appendix XX
Approved Stamped Plans Concept Development Application	City of Sydney	Appendix YY
Voluntary Planning Agreement	City of Sydney	Appendix ZZ
Landowners Consent	Landowners	Appendix AAA
Design Verification Statement	FJC	Appendix BBB
CGI Forbes Street Building	FJC	Appendix CCC
CGI Public Park	FJC	Appendix DDD
CGI William Street	FJC	Appendix EEE

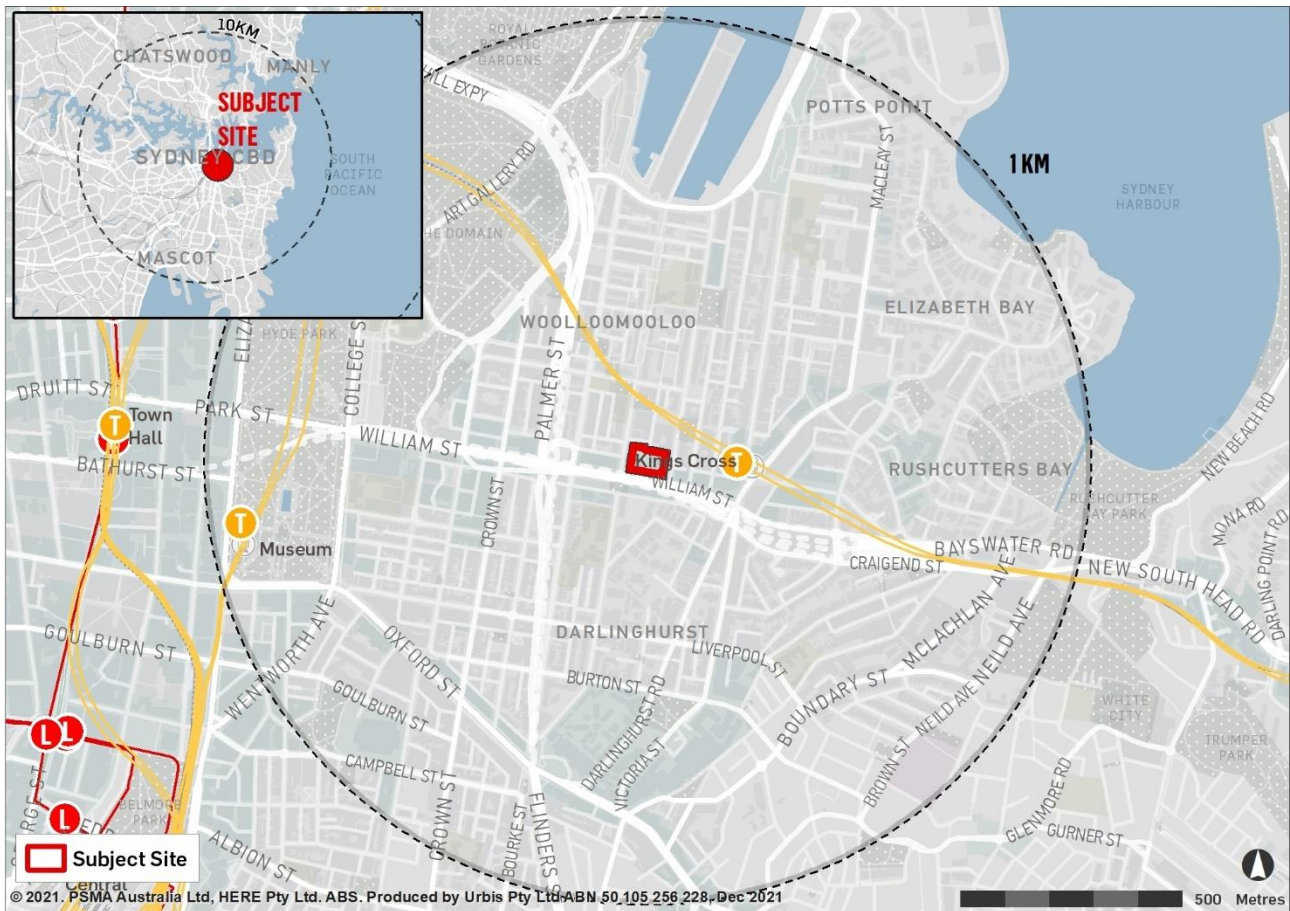
2. Strategic Context

This section of the EIS describes the key features of the site and its relationship to its local context. It also discusses how the project aligns with relevant strategic planning policy. It identifies other projects that should be considered in assessing the cumulative impacts of the project and also outlines the potential feasible alternatives explored by the applicant.

2.1. Key Features of Site and Locality

The location of the site is illustrated in **Figure 1**. The key features of the site are described in **Table 5** below. Photographs of the current site condition are provided in **Figure 2**.

Figure 1: Local Context Map



Source: Urbis

Table 5: Site and Locality Description

Characteristic	Description
Key Site Features	
Country	The site is located on Gadigal Country within the Eora Nation
Site Name	Bayswater
Address	164-172 and 174-194 William Street, Woolloomooloo
Legal Description (Title Particulars)	Lot 52 in DP 1049805 and Lot 1 in DP 816050
Zoning	MU1 Mixed Use

Characteristic	Description
Number of existing lots	2
Existing Use / Structures	The site currently contains a warehouse style structure and glass office building.
Site Area	6,398sqm
Site Frontage	93.4m to William Street in the south.
Site Width	Approximately 66.5m to Dowling Street in the east, 66.5m to Forbes Street in west and 36.2m to Judge Lane in the north
Vehicular/Site Access	Vehicular access to the site is currently via Dowling Street, Forbes Street, and Judge Lane.
Adjacent land uses North	'Woolloomooloo Heritage Conservation Area', is located to the north of the site, with numerous heritage items including Victorian styled residential terrace housing to the southern ends of Dowling Street and Forbes Street. Further north is the Woolloomooloo finger wharf which is home to numerous food and drink premises and Ovolo hotel.
Adjacent land uses East	Avis Car and Truck Rental and Campervan Rental is located to the east of the site fronting Dowling Street and William Street, which are located at the ground level of a multi-storey residential building. Further east is the 'Coca-Cola' billboard and Kings Cross.
Adjacent land uses South	On the opposite side of William Street, to the south, includes mixed used buildings with ground floor retail and residential apartments above.
Adjacent land uses West	Closer to William Street to the west is a 10-storey glass commercial building and 6-storey rendered mixed use building with retail tenancies on the ground floor and residential apartments above.
Topography	The topography of the site falls significantly from William Street in the south to Judge Lane in the north.
Vegetation	The site contains minimal vegetation, mostly overgrown plants. Surrounding streets support varying densities of street tree planting, in particular along William Street and Dowling Street.
Flooding/Overland Flow	Flood results show that the site is flood affected along all boundaries. The flood depths are deepest along Judge Land, which is due to the narrow flood path limiting the flow. Peak 1% AEP flood levels long the site boundary vary from 25.00m AHD at the southeastern site boundary to 13.00m AHD at the northwestern site boundary.
Heritage	The site is not listed as a local or State heritage item nor is it located within a heritage conservation area under the SLEP 2012. The following locally significant heritage items are in proximity to the site: ▪ Former commercial building "Bryson House" including facade and main stairs, 150–166 Forbes Street, Woolloomooloo (I2178) ▪ Terrace group including interiors, 168–172 Forbes Street, Woolloomooloo (I2179) □ Former warehouse "Cancer Council" including interior, 153–161 Dowling Street, Woolloomooloo (I2166) ▪ Terrace group including interiors, 167–169 Dowling Street, Woolloomooloo (I2167) ▪ Commercial building "Chard's Building" including interior, 171–175 William Street, Darlinghurst (I499)

Characteristic	Description
	Commercial building “Grenville House” including interior, 177–185 William Street, Darlinghurst (I500) At the sites northern boundary, the site adjoins Woolloomooloo Heritage Conservation Area (HCA). The site is also located to the north of the William Street South HCA, and the Rosebank HCA.
Aboriginal Archaeology	The Aboriginal Objects Due Diligence Assessment (Appendix SS) undertaken for the project concludes that there is no known Aboriginal cultural heritage on or near the subject area, nor is it reasonably likely that Aboriginal cultural heritage occurs on or near the site.
Acid Sulfate Soils	The site is located on Class 5 Acid Sulfate Soil land with an extremely low probability of occurrence.
Contamination	A Detailed Site Investigation (DSI) has been undertaken to accompany the proposed development (Appendix CC). It found that the site is likely to be impacted by the following contaminants: - Contaminated fill and natural soils; - Underground fuel storage tanks (USTs) and associated hydrocarbon contamination; and - Hazardous building materials. The site will be remediated to support the proposed mixed-use development.
Views	The site is located in a highly sensitive visual catchment, with views available to the Sydney Opera House, the Sydney Harbour Bridge, the Domain, St Mary’s Cathedral, the city skyline and harbour views.
Surrounding Locality	
Public Transport	Kings Cross Train Station is located within a 4-minute walk from the site to the east, with inner city stations St. James and Museum located approximately 15 minutes from the site. A bus stop is located on the site’s frontage to William Street.
Major Roads	William Street, which the site fronts, is a major road connecting Sydney’s eastern suburbs with the inner city. It is identified as a Regional Road by Transport for NSW (TfNSW).
Open Space	- Hyde Park is located approximately 700m west of the site. - Cook + Phillip Park is located approximately 500m west of the site. - The Domain is located approximately 750m north-west of the site.
Social Infrastructure (Schools/Hospitals etc.)	Schools and hospitals within 1km of the site include: - SCEGGS Darlinghurst - SDN Woolloomooloo - Plunkett Street Public School - Sydney Distance Education High School - Darlinghurst Public School - Sydney Grammar School - Hospitals - East Sydney Private Hospital - St Luke’s Private Hospital - St Vincent’s Private Hospital - Sydney Hospital

Figure 2: Site and Locality Photographs



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

2.2. Other Development in the Area

The site is located within Woolloomooloo. Approved and likely future major projects which may be relevant in the cumulative impact assessment of the proposal are summarised in **Table 6**.

Table 6: Surrounding Development Applications

SSDA Reference	Development Description	Current Status
SSD-78363487	134 William Street, Woolloomooloo Alterations and additions to the existing commercial building to construct a mixed-use development with commercial and residential land uses including in-fill affordable housing.	Preparing EIS
SSD-84718460	203-225 Victoria Street, Potts Point Mixed use development comprising residential accommodation and associated retail.	Preparing EIS
SSD-79316759	45-53 Macleay Street, Potts Point Concept development application for a mixed-use development comprising residential and ground floor retail	Under Assessment

SSDA Reference	Development Description	Current Status
SSD-83867719	45 – 53 Macleay Street, Potts Point Detailed design stage of the site's redevelopment including construction and operation of a shop-top housing development which reflects the outcomes of the design competition, provision of 15% GFA for affordable housing, basement parking.	Preparing EIS
SSD-76116958	45 – 53 Macleay Street, Potts Point Construction of 13 storey mixed-use development with in-fill affordable housing comprising 3 levels of basement, ground floor retail and residential above.	Preparing EIS
D/2021/689	101 Palmer Street, Woolloomooloo Alterations and additions to an existing residential terrace to construct a residential flat building with 6 storeys, 10 apartments, roof top communal open space and associated landscaping works.	Approved 22/02/2023 Yet to be constructed.

The potential cumulative impacts of the project are addressed in **Section 66** of the EIS in accordance with the DPHI *Assessing Cumulative Impacts* guidelines.

2.3. Agreements With Other Parties

A Planning Agreement has been executed and registered on the site in relation to the concept consent (VPA/2023/2). The terms of the planning agreement were negotiated and agreed by the developer and Council in March 2024. Whilst the proposed development has no implications on the outcomes of the VPA, in that it will continue to be designed, constructed and delivered in accordance with the terms of the VPA, the VPA will be amended to reflect the SSD development.

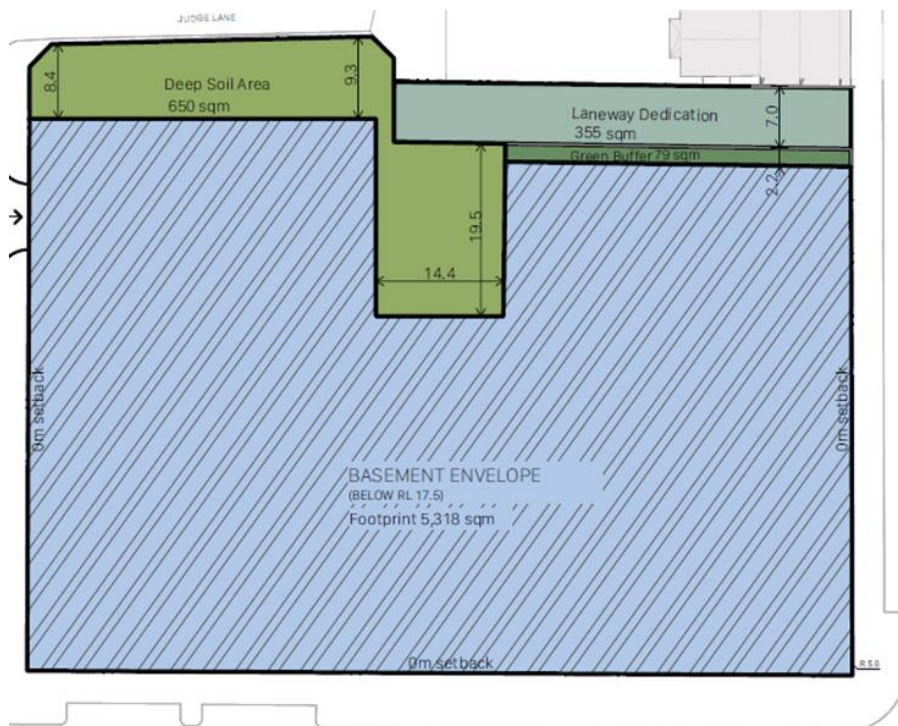
The planning agreement has been executed and is registered on title. Key details of the planning agreement are as follows:

- **Parties:**
 - The Council of the City of Sydney (Council)
 - William Street Residential Pty Ltd (the Applicant)
 - Gwynvill Trading Pty Ltd (Landowner)
 - Kenmure Holdings Pty Ltd (Landowner)
- **Development Contributions:**
 - **Transfer Land:** The transfer or dedication of an area of approximately 355sqm for a pedestrian laneway. Due after the completion but before the first OC for the development.
 - **Developers Works:** Construction of a 7m wide pedestrian laneway on the Transfer Land connecting Dowling Street with Judge Lane in accordance with the City's technical specifications and standards.
- **The Transfer Land must:**
 - be remediated in accordance with the Development Consent to be suitable for use as a public laneway, prior to its transfer or dedication to the City;
 - not be subject to any long-term Environmental Management Plan; and
 - be transferred or dedicated to the City free of any encumbrances or encroachments except underground services or utilities, or any encumbrances or encroachments agreed in writing by the City in its absolute discretion.
- The Developer's Works comprise the following elements to be delivered in accordance with this document:

- A new 7m wide pedestrian laneway connecting Dowling Street with Judge Lane to integrate with existing adjacent roads and footpaths with all works to be constructed to the City's technical specifications.

The land subject to the VPA is indicated in **Figure 3** below denoted as *Laneway Dedication*.

Figure 3: Land Subject to the VPA



Source: FJC Studio

As aforementioned, the VPA will be amended to reflect this SSD. The amendment process to the VPA will involve coordination between the relevant parties to update the agreement, ensuring it references this SSD application rather than the concept approval which will be relinquished. This amendment is administrative in nature, as the terms and obligations of the executed VPA remain unchanged and the proposed development does not alter the agreed outcomes. The amendment to the VPA will therefore operate concurrently with the SSD assessment process to ensure consistency between the consent authority's determination and the registered agreement. For reference, a copy of the original VPA is provided at **Appendix ZZ**.

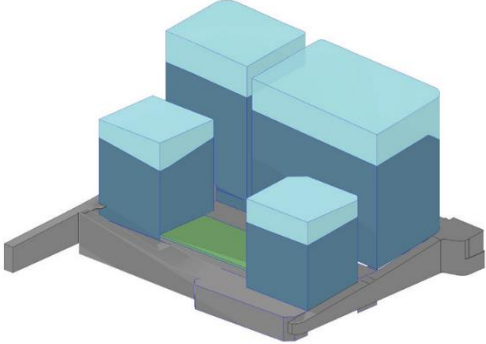
2.4. Feasible Alternatives

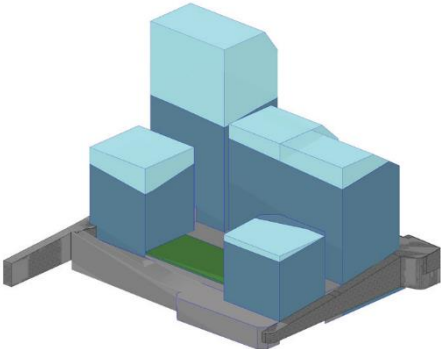
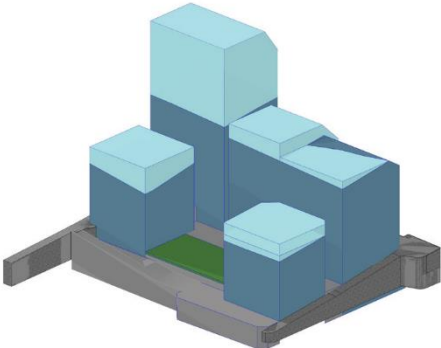
Clause 192(1)(c) of the *Environmental Planning and Assessment Regulation 2021 (the Regulation)* requires an analysis of any feasible alternatives to the proposed development, including the consequences of not carrying out the development.

The project team examined several feasible alternatives to the proposed development as outlined in **Table 7**.

Table 7: Project Alternatives

Option	Discussion
Option 1 - Do Nothing	The site has undergone a series of planning investigations in order to achieve the best outcome for the site. A "do nothing" approach would fail to capitalise on the site's potential for renewal within a strategic inner-city location. This approach would result in the underutilisation of this large site and fail to deliver on the Government's direction of providing increased affordable housing and jobs in locations close to transport hubs and public infrastructure.

Option	Discussion
	The consequences of not carrying out the development would undermine the strategic objectives of the CoS Local Housing Strategy, relevant Metropolitan and District Plan objectives and significant public infrastructure investment by Federal, State and local government to support increased affordable housing options in well-located areas.
Option 2 - Continue with Concept DA	Option 2 would involve progressing a detailed development application in accordance with the approved Concept DA. Pursuance of this option would result in a loss of 60 affordable dwellings capable of providing secure housing for low to moderate income key workers as well as an additional 167 market homes. This outcome would be inconsistent with current State policy objectives and result in an underutilisation of the site considering its location and on-site amenity. Figure 4: Detailed Application Pathway  Source: FJC studio
Option 3 - Alternative Design	The site has undergone a rigorous DEC, with the winning scheme prepared by FJC Studio, Tribe Studio and Studio Bright. This scheme demonstrated the strongest ability to achieve design excellence. Any significant departure from the endorsed design principles risks compromising the integrity and outcomes of the DEC. However, the proposed 30% uplift has been carefully integrated through a considered design process that responds sensitively to the site's context while retaining the core principles of the original scheme. Six massing strategies were explored during the design evolution. The two key options are outlined below. Further detail is available in the Urban Design Report (Appendix L). Option 1: Uniform 30% Height and GFA Uplift This initial approach applied a uniform 30% increase in height and GFA across all buildings. While straightforward, it introduced a number of urban and contextual issues, including increased overshadowing, view loss, and environmental impacts. Refer to Figure 5. Figure 5: Option 1 Massing  Option 4: Refined Articulation for Solar Access 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

Option	Discussion
	access to residential dwellings along the southern boundary while maintaining a coherent urban form. This option was reviewed by the DIP, which recommended removing height from the southwestern corner to reduce overshadowing and view impacts. The DIP also advised redistributing massing towards the northern part of the site to achieve a more balanced composition. Refer to Figure 6.
	Figure 6. Figure 6: Option 4 Massing 
Option 4 - The Proposal	The design team developed a range of uplift strategies to ensure the final proposal maintained the integrity of the winning scheme while minimising off-site impacts. The DIP reviewed each of the six option and formally endorsed Option 6 as the preferred massing solution. This option forms the proposed development. Option 6: Preferred Scheme Option 6 responds directly to DIP feedback by relocating additional GFA to the Dowling Street building. Unlike Option 5, which followed a similar approach, Option 6 avoided triggering increased building serviceability requirements. This option concentrates additional bulk in less sensitive areas, preserving key view corridors, maintaining view sharing, protecting solar access for adjacent developments, and mitigating overshadowing. Comparative analysis across all six schemes confirmed that Option 6 most effectively accommodated the uplift while minimising environmental and amenity impacts. The DIP endorsed this scheme as the most contextually appropriate outcome. Refer to Figure 7. Figure 7: Option 6 Massing  For further detail, refer to the Urban Design Report (Appendix L).

2.5. Strategic Planning Alignment

The proposed development is aligned with the State, district and local strategic plans and policies applying to the site as outlined in **Table 8** below.

Table 8: Strategic Planning Consistency

Plan	Detail
National Housing Accord 2022	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.
NSW Housing Strategy: Housing 2041	In March 2021, the NSW Housing Strategy: Housing 2021 was released. It sets out a long-term (20 year) strategy for better housing outcomes across NSW. High density housing was identified as an important housing typology to expand housing choice across the state. This proposal is well positioned well to deliver housing choice through the varied apartment types.
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

Plan	Detail
	liveability and sustainability, promoting a well-connected, vibrant, and resilient community.
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).
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).
Sustainable Sydney 2030 – 2050	The Sydney LSPA 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 plan for these reasons:

Plan	Detail
	▪ Alignment with Climate Action and Environmental Goals: The proposal's consistency with the Housing SEPP and the Competitive Design Alternatives process aligns with the strategic plan's emphasis on climate action and environmental sustainability. By incorporating sustainable design principles and aiming for high environmental performance, the proposal supports the strategic direction of making the city a leading environmental performer. This includes reducing carbon emissions, increasing green cover, and promoting water and energy efficiency (Strategic Direction 2: A leading environmental performer). ▪ Enhancement of Public Spaces and Connectivity: The proposal's plan to create a high-quality public domain with through-site links aligns with the strategic plan's vision of enhancing public places for all. This includes improving walkability, creating connected communities, and ensuring that public spaces are accessible and enjoyable for everyone. The site is also well located in relation to public transport and pedestrian and cycling links. The strategic plan emphasizes the importance of public spaces in fostering social interaction and community well-being (Strategic Direction 3: Public places for all and Strategic Direction 5: A city for walking, cycling and public transport). ▪ Commitment to Affordable Housing: The proposal's inclusion of 15% affordable housing aligns with the strategic plan's objective of providing housing for all. This commitment supports the strategic direction of ensuring that diverse housing needs are met within the community, including affordable and social housing. The strategic plan sets a target for 7.5% of all private dwellings to be affordable housing, which the proposal directly contributes to (Strategic Direction 10: Housing for all). ▪ Integration with Sustainable Development Goals: The proposal's plan to introduce residential, commercial, and retail uses aligns with the strategic plan's emphasis on sustainable development. By creating a mixed-use development that has undergone a competitive design competition, the proposal supports the strategic direction of design excellence and sustainable development, which aims to ensure that new buildings and spaces are environmentally responsible and contribute to the city's sustainability goals (Strategic Direction 4: Design excellence and sustainable development).
Housing for All: City of Sydney Local Housing Strategy	The CoS's Housing Strategy is an extension of the City's LSPS and provides more detailed priorities, objectives and actions to deliver homes in the right locations and improve the quality and diversity of housing in the LGA. The project is consistent with the Housing Strategy for the following reasons: ▪ The proposal includes residential, commercial, and retail uses, aligning with the strategy's emphasis on diverse housing types and vibrant local economies. ▪ The proposal's commitment to 15% affordable housing supports the strategy's objective to increase the number of affordable dwellings, contributing to the target of 11,690 affordable dwellings in the LGA by 2036. ▪ The proposal's design respects the heritage context, consistent with the strategy's priority to create and renew great places while respecting the district's heritage. ▪ The inclusion of high-quality public spaces and through-site links aligns with the strategy's focus on creating liveable, connected communities with access to infrastructure and services.
Future Transport Strategy	The NSW Future Transport Strategy is a long-term plan for transforming the transportation landscape in New South Wales. It aims to create a modern, efficient, and customer-focused transport system that can adapt to emerging technologies and cater to the evolving needs of a growing population. The project supports the objectives of the Future Transport Strategy by promoting higher residential density and delivering affordable housing within 300 metres of Kings Cross Train Station, encouraging greater use of public transport. It also strengthens the active transport network by introducing through-site links, enhancing pedestrian connectivity and accessibility across the precinct.
Better Placed	In August 2017, the Government Architect for NSW (GANSW) released Better Placed, a strategy that establishes priorities and objectives to create well-designed built environments. It aims to address key challenges and directions, ensuring good design outcomes for NSW. The proposed development aligns with the Better Placed objectives as follows:

Plan	Detail
	▪ Better Fit: The development integrates seamlessly with the surrounding urban landscape, reflecting the area's character through its architectural forms and material choices. The design thoughtfully incorporates the additional density allowed under the Housing SEPP without introducing any adverse impacts. ▪ Better Performance: The project ensures high amenity levels for each apartment, adhering to contemporary ADG standards. It considers solar access, indoor and outdoor spaces, privacy, efficient layouts, and outlook. The design maximises solar access through strategic massing and orientation, and meets ESD targets, including BASIX, demonstrating a commitment to sustainability. ▪ Better Community: The development includes a mix of affordable and market housing, along with new commercial spaces and pedestrian connections. Communal open spaces and amenities are provided, fostering an inclusive social environment and building a sense of community. ▪ Better for People: The design addresses Crime Prevention Through Environmental Design (CPTED) principles, ensuring physical and passive surveillance, accessibility, and safe interfaces with the public realm. Built form strategies ensure a safe and comfortable presentation at public domain interfaces. ▪ Better for Working: The spatial arrangements of residential and non-residential areas are designed to be fit for purpose, supporting their intended uses, including commercial spaces at the lower levels. ▪ Better Value: The development's location near public transport and amenities enhances its value, providing significant returns on infrastructure investment and contributing to addressing the housing affordability crisis, a key policy mandate of the NSW Government. ▪ Better Look and Feel: External materials and finishes are chosen for their contextual appropriateness, quality, and longevity. The design has undergone rigorous review, confirming its achievement of "design excellence" and alignment with the principles of Better Placed.
Connecting to Country Framework	The Government Architect NSW endorsed the Connecting with Country Framework in November 2023 with the intention of providing guidance and suggestions to engaging with Indigenous communities. As detailed in Section 3.4 of this EIS, the proposed built form and landscape design has been informed by extensive Connecting with Country engagement and consultation which aligns with the intent of the Connecting with Country Framework.
Low and Mid-Rise Housing	The purpose of the Low and Mid-Rise (LMR) Housing provisions under Chapter 6 of the Housing SEPP is to encourage the development of low and mid-rise housing in areas that are well-located in relation to goods, services, and public transport. This includes land identified within an 800-metre walking distance of 'Town Centres', public entrances to railway, metro or light rail stations, or light rail platforms, as defined in Schedule 11 of the Housing SEPP. Areas identified under this reform are expected to experience a period of transition and are likely to see changes in the development landscape. In relation to this project, the LMR Housing controls identify Potts Point as a Town Centre due to its proximity to Kings Cross Railway Station, which is located just east of the site. As such, largescale development is generally anticipated within this area, with the expectation that the local context will continue to evolve over time.

3. Project Description

The following section of the EIS summarises the key numeric components of the proposed development and describe the demolition, site preparation, construction and operational phases in further detail.

3.1. Project Overview

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.
- 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.

3.1.1. Numerical Overview

A numerical overview of the proposed development is provided in **Table 9**.

Table 9: Numerical Overview of the Proposed Development

Descriptor		Value / Description
Key Metrics		
Site Area	6,398sqm	
Podium Height	Four (4)-storey podium accommodating retail and residential apartments.	
Number of Levels	Basement	4 basement levels, containing building services and car parking facilities.
	Above Ground	7 to 18 storeys above ground.
Gross Floor Area	Total GFA	33,036sqm
	Retail GFA	1,718sqm
	Residential GFA	25, 866sqm
	Affordable Housing GFA	4,949sqm
Floor Space Ratio	Total FSR	5.16:1.
	Non- Residential FSR	0.31:1.

Descriptor		Value / Description
Setbacks	Judge Lane (North)	8.4m
	Dowling Street (East)	0m
	William Street (South)	0m
	Forbes Street (West)	0m
Apartment Mix	Market Housing	167 apartments
	Affordable Housing	60 apartments
Unit Mix		
One (1) Bedroom	54	
Two (2) Bedroom	71	
Three (3) Bedroom	102	
Communal Space and Landscaping		
Communal Space	5,176sqm.	
Publicly Accessible Open Space	1,356 sqm publicly accessible central park	
Landscape Area	2,702sqm (43%)	
Deep Soil	826sqm	
Car Parking, Loading, Servicing and Vehicle Access		
Vehicle Access	Vehicle access to be provided off Forbes Street.	
Car Parking	Total	340 spaces
	Residential (standard)	263
	Residential (affordable)	26
	Visitor (residential)	10
	Retail	32
	Car share	5
Motorcycle Parking Spaces	24 spaces	
Bicycle Storage Spaces	298 spaces, including: 7 Retail 17 Retail Visitor 248 Residential 26 Residential Visitor	
Loading and Servicing	Provided off Forbes Street, separate to the basement car park entrance.	
Economic		
Jobs	Construction – approximately 440 direct full time equivalent jobs.	

Descriptor	Value / Description
	Operation – approximately 1,208 jobs.
Estimated Development Cost	Approximately \$415,794,759

3.2. Detailed Description

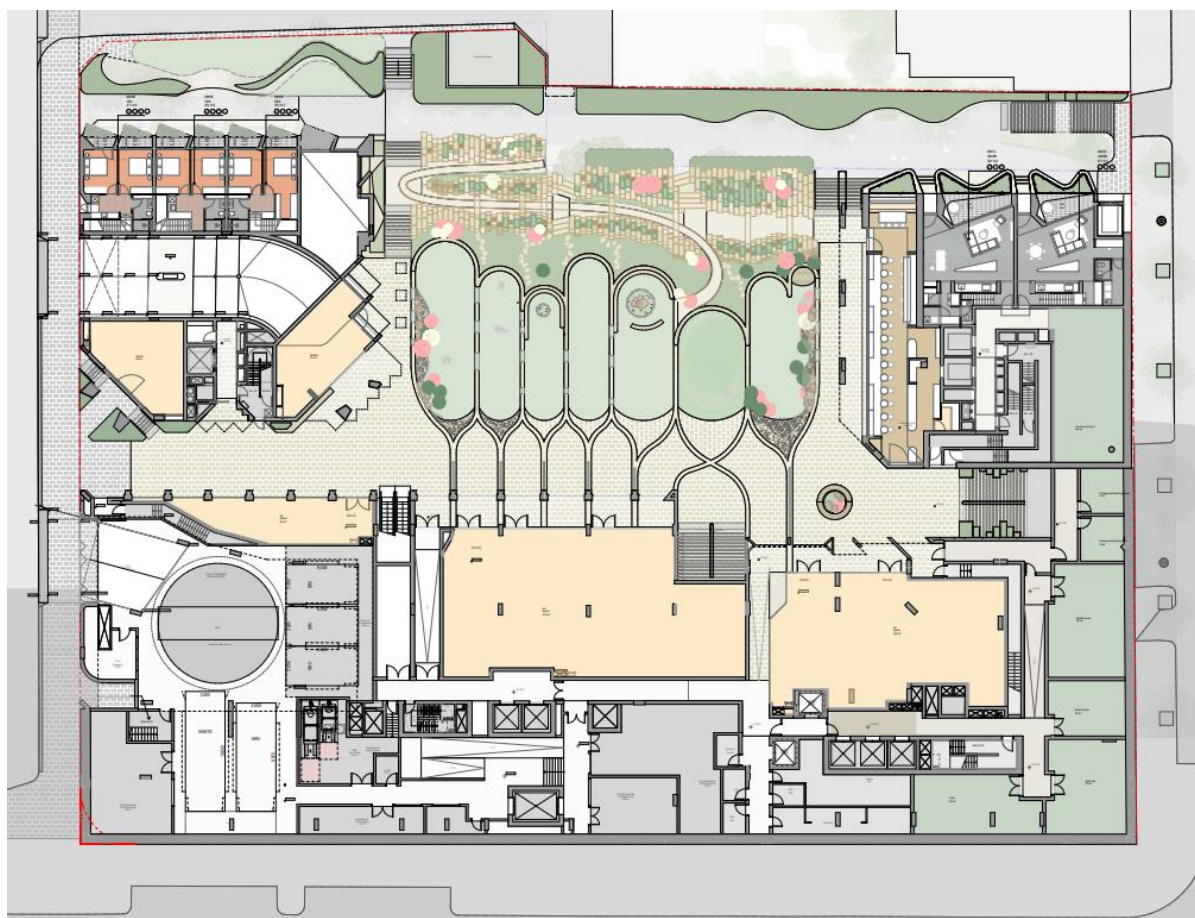
3.2.1. Physical Layout and Design

The proposed site layout has been designed and considered in a holistic way. It has sought to provide integration with the surrounding Woolloomooloo context (current and future), whilst maximising on site amenity to the publicly accessible open park space in the centre of the site. The design incorporates a series of pedestrian connections via through site links and laneways. These connections have been thoughtfully considered to ensure equitable access for all visitors, improving connection across the site and through to the broader community.

The proposed site layout and uplift have been strategically considered to maximise the quality and amenity of all apartments, ensuring equal access to sunlight, views, and communal spaces. The site benefits from a northern harbour orientation, providing residents with shared spaces that offer panoramic views.

Appropriate building separation has been incorporated into the design to allow for privacy and increased sight lines throughout the site. In terms of setbacks, the design includes a built to boundary interfaces with Forbes Street, William Street and Dowling Street. This design outcome, paired with active ground floor uses will allow for the activation of the street frontages of which is desired for this location.

Figure 8: Site Plan



Source: FJC Studio

Figure 9: Overall Site Plan (3D View)



Source: Design Report 2025

3.2.2. Building Design and Land Use Composition

The proposed development comprises four buildings designed by three architectural firms, with FJC as the lead architect and Tribe Studio and Studio Bright engaged as sub-architects under FJC. The positioning of each building across the site enhances pedestrian connectivity, ground plane outcomes, and visual interest.

The built form varies in height across the site and is specifically designed to curate a bespoke laneway feel through the site, which opens out onto an active central public park. The building design and land use composition support the creation of a mixed-use precinct, which include large format retail tenancies along the William Street frontage and smaller scale tenancies within the laneway. The retail tenancies within the Dowling Street building are intended to activate the parks edge and provide for a seamless integration of open space, outdoor dining and residential uses.

Each building, its associated uses and GFA breakdown are provided within **Table 10** below.

Table 10: GFA Schedule

Building	Built Form	GFA	Apartments
William Street West Building (FJC)	1 level of retail fronting William Street 1 level of retail facing internal laneway 8 – 10 levels of residential space - Roof top communal open space area - Terrace indoor communal space	- Retail - 888sqm - Residential (Market) - 8,618sqm - Residential (Affordable) - 3,743sqm - Total: 13,248sqm	Market: 92 Affordable: 46
William Street East Building (FJC)	1 level of retail facing internal laneway 17 - 19 levels of residential space	- Retail - 535sqm - Residential (Market) - 11,904sqm - Total: 12,807sqm	Market: 79
Forbes Street Building (Studio Bright)	1 level of retail facing internal laneway 4-7 residential levels facing Judge Lane 1 level of communal indoor space facing internal park	- Retail - 112sqm - Residential (Market) - 1,499sqm - Residential (Affordable) - 1,206 sqm - Total: 2,871sqm	Market: 12 Affordable: 14
Dowling Street Building (Tribe Studio)	1 level of retail tenancies 9 levels of residential space 1 level of communal indoor space	- Retail - 183sqm - Residential (Market) - 3,845sqm - Total: 4,110sqm	Market: 30

Figure 10: William Street Buildings



Source: FJC Design Report 2025

Figure 11: Forbes Street Building



Source: Studio Bright - Design Report 2025

Figure 12: Dowling Street Building



Source: Tribe Studio - Design Report 2025

3.2.3. Bonus Floor Space Ratio and Height

The proposed FSR and Height of the buildings have been established through the incentives provided by the in-fill affordable housing provisions of the Housing SEPP. Under the Housing SEPP, “residential development” that provides at least 15% of the total GFA as affordable housing (in addition to any other affordable housing required under another planning instrument) for a minimum of 15 years is eligible for 30% uplift in the permitted FSR and building height controls.

The following outlines the methodology for calculating the proposed floor space ratio and provision of affordable housing units.

Table 11: Bonus Floor Space Ratio and Height

SLEP Control		SLEP Base Control	10% Design Excellence	30% Uplift Control	Overall Permitted Control	Proposed
Clause 4.3 – Height of Buildings	William Street Frontage	35m	-	45.5m	45.5m	66.3m
	Dowling Street	22m	-	28.6m	28.6m	34.6m
Clause 4.4 – Floor Space Ratio	164-172 William Street	4:1 (5,692sqm)	4.4:1 (6,261sqm)	5.72:1 (8,139sqm)	5.72:1	7.15:1
	174-194 William Street	3.5:1 (17,434sqm)	3.85:1 (19,177sqm)	5:1 (24,930sqm)	5:1	4.59:1
	Combined FSR	3.61:1	3.97:1	5.16:1	5.16:1	5.16:1
Gross Floor Area		23,126sqm	25,412sqm	33,035sqm	33,035sqm	33,036sqm
15% Minimum Affordable Housing GFA						
Affordable GFA				4,955sqm	4,955sqm	4,949sqm

A Clause 4.6 Variation Request for FSR and Building Height is submitted to justify the non-compliance with the maximum permitted controls of the site (at **Appendix F** and **Appendix G**). The variation is well-founded and justified and there are sufficient environmental planning grounds to warrant contravention of the FSR control.

3.2.4. Public Domain and Landscaping

3.2.4.1. Ground Plane

The proposed development incorporates an integrated public domain and landscape strategy that activates the site, enhances amenity, and contributes positively to the local streetscape. The urban design and landscape approach to the site has been developed by FJC and Bangawarra. The ground plane has been designed specifically in response to the aboriginal values of the historic Woolloomooloo area. It reflects a deep understand of culture, place and Country of which is nuanced for each site. The redevelopment aims to understand and protect the needs of its Country, being Snapper Country, extending this knowledge system. The design and landscape outcomes on the ground plane respond to Country through:

- Planting Seven Peacekeepers gum species
- Including varying grasses and grass trees
- Blurring the edges of landscape planting with hard surfaces
- Incorporating shell hooks in public seating-built forms
- Using rough cut sandstone
- Designing pedestrian walkways to reflect the shape of string or fishing lines

- Introduction of the GyMEA Lily

Figure 13: Public Domain Connecting with Country Overarching Themes and Strategies



Source: *Connecting with Country Report Bangawarra*

Figure 14: Proposed Ground Plane and Landscape Planting

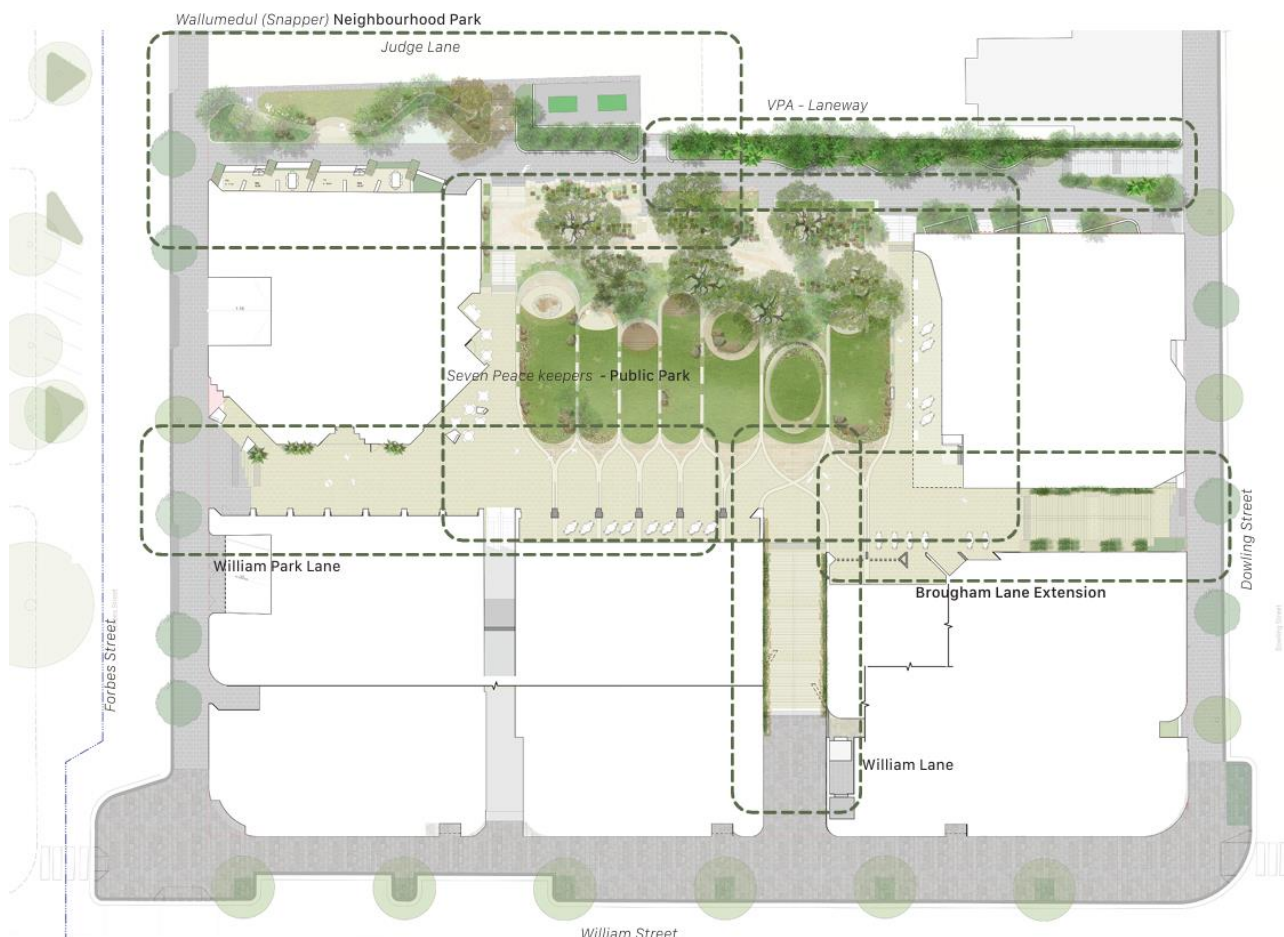


Source: *FJC Design Report 2025*

In addition to the above, the site benefits from multiple street frontages, the site enables the creation of new through-site links that activate ground floor uses and improve pedestrian permeability across the precinct. As seen in **Figure 15**, this includes both an east–west and a north–south connection with a number of landscaped public open spaces throughout.

Accessible lifts are provided within the FJC building along William Lane and with the Tribe Studio building along the VPA laneway to ensure 24/7 equitable access is provided across the site.

Figure 15: Public Domain Ground Plane



Source: FJC Studio

VPA Laneway

A key component of this connectivity is a new seven-metre-wide public laneway linking Judge Lane and Dowling Street. This laneway will be delivered in accordance with the executed VPA and continues the alignment of the existing Judge Lane, providing a clear and direct east–west pedestrian link through the site.

The proposal ensures equitable access across the site, including the VPA laneway. Both the Dowling Street and Forbes Street entries provide at-grade access points. The Dowling Street entry includes an accessible lift to accommodate the level changes for those unable to utilise the stairs.

Figure 16: VPA Laneway

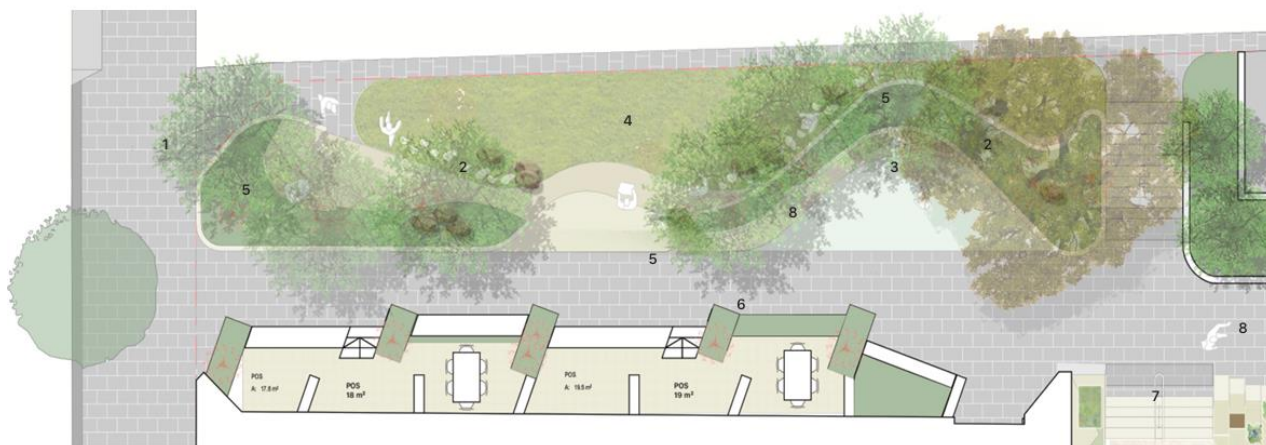


Source: FJC Studio

Neighbourhood Park

The VPA laneway connects to a community focused space in the northwestern corner of the site known as Walumay (Snapper) Neighbourhood Park, servicing new residents, visitors of the site as well as the already established surrounding neighbourhood. This space features a nature play area and pocket park to support everyday activities, host small local events, and other social occasions. The park acts as a point of connection for new and existing residents, creating opportunities for casual encounters and shared experiences.

Figure 17: Proposed Walumay (Snapper) Neighbourhood Park



Source: FJC Studio

Yiningma Park

A defining feature of the ground plane is Yiningma Park which is a publicly accessible, privately owned open space that is open to the sky. This unique park has been made possible through the redistribution of building mass across the site, with smaller more compact building footprints which prioritise communal gathering spaces.

Yiningma Park features seven planted gum trees referred to as the Seven Peacekeepers, following collaboration with Bangawarra. The Seven Peacekeepers landscape strategy draws on the cultural significance of eight types of gum trees for the local D'harawal people. Known as the Seven Peacekeepers and the Peacemaker, these trees are vital for their cultural, ecological, and ceremonial roles, identifiable by their distinct bark types. Their presence in a space is believed to enhance healing qualities and improve the health and effectiveness of local ecologies and plant species.

This space is embedded with several other Connecting with Country design elements including sandstone escarpment pathways, seated spaces of sandstone material, a fishhook interpretive gathering area, rippled paving and more.

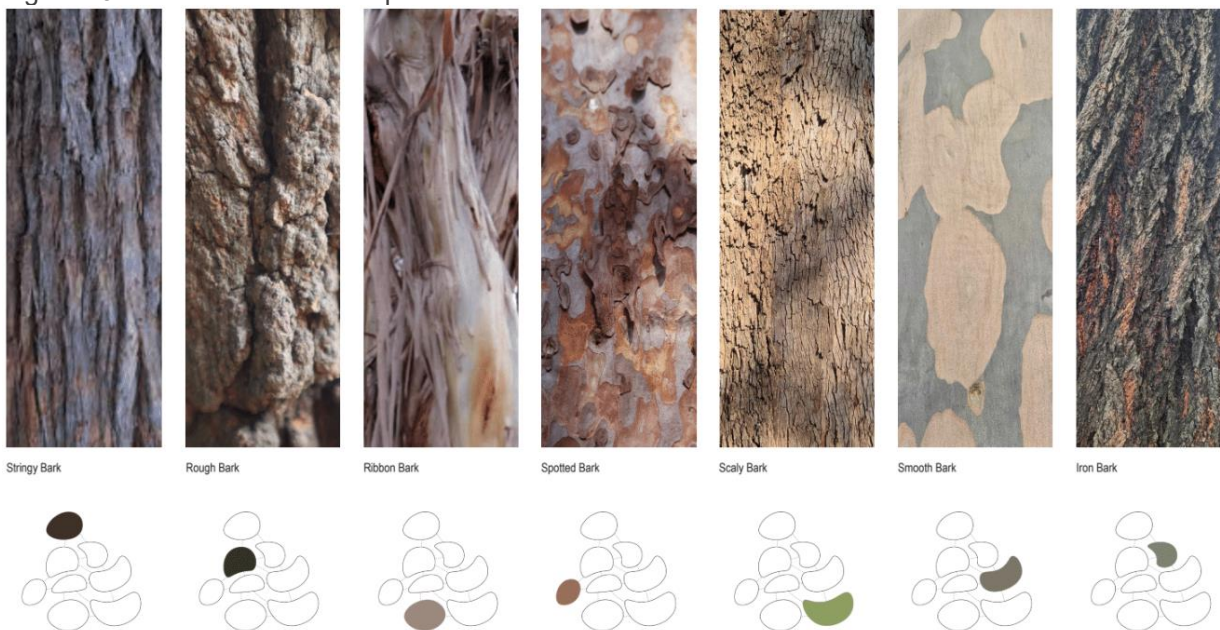
In addition to the landscape and public realm embellishments, the park is surrounded by retail tenancies which face onto the park. This allows for activated edges and a seamless transition between park space and retail uses. Passive surveillance from these tenancies also becomes possible as a result of these retail spaces to the edge of the public space.

Figure 18: Proposed Yiningma Park



Source: FJC Studio

Figure 19: The Seven Peacekeepers

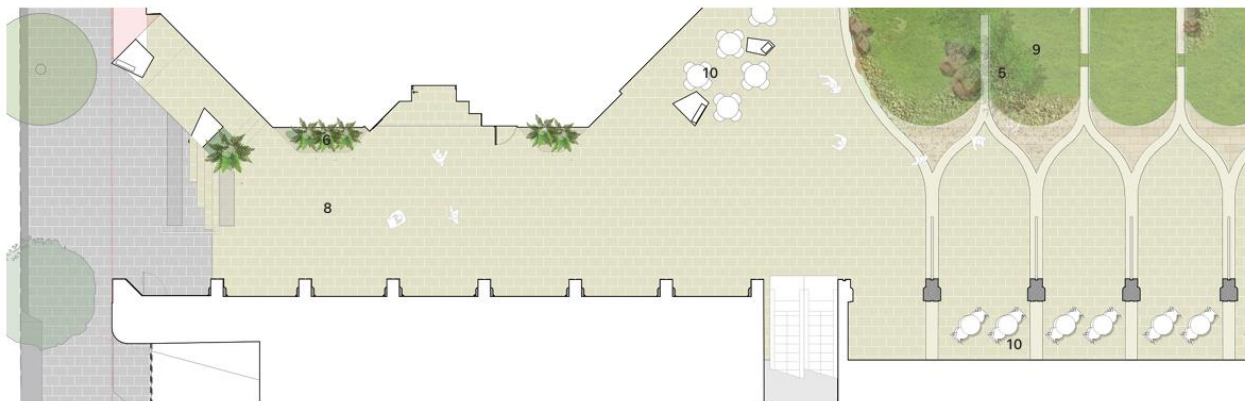


Source: Bangawarra

William Park Lane

William Park Lane runs parallel to William Street, connecting Forbes Street to the central Yiningma Park. The narrow portion of the laneway is 6m wide, which increases in width and provides opportunities for outdoor gathering and retail dining. The lane is positioned at grade, off Forbes Street. The splayed edge of the Bright Studio building promotes way finding and visual interest when viewed from William Street in the west and along Forbes Street.

Figure 20: William Park Lane

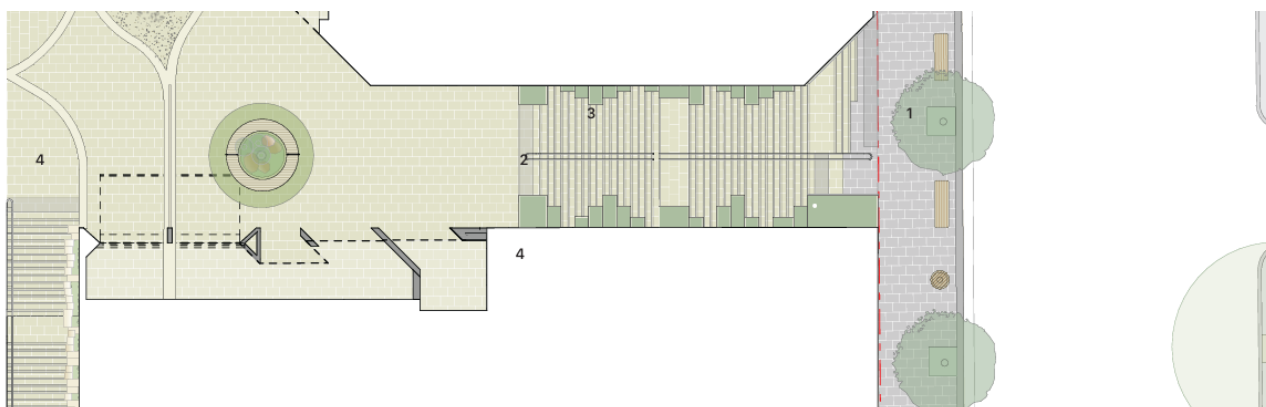


Source: FJC Studio

Brougham Lane Extension

The Brougham Lane forms the eastern connection to Dowling Street, connecting into the central park and William Park Lane. Together, these two laneways form the east/west connection across the site. As a result of the level transition, this laneway largely comprises a series of stairs, with the building then setback to create a more intimate setting for residents, locals, and workers to meet, dine, and enjoy coffee. This alcove is positioned away from the noise and traffic of William Street and offers a quieter pedestrian space. The vision is to create a true urban lane that thrives with weekday commerce and weekend cafe life that enhances the community feel.

Figure 21: Brougham Lane Extension

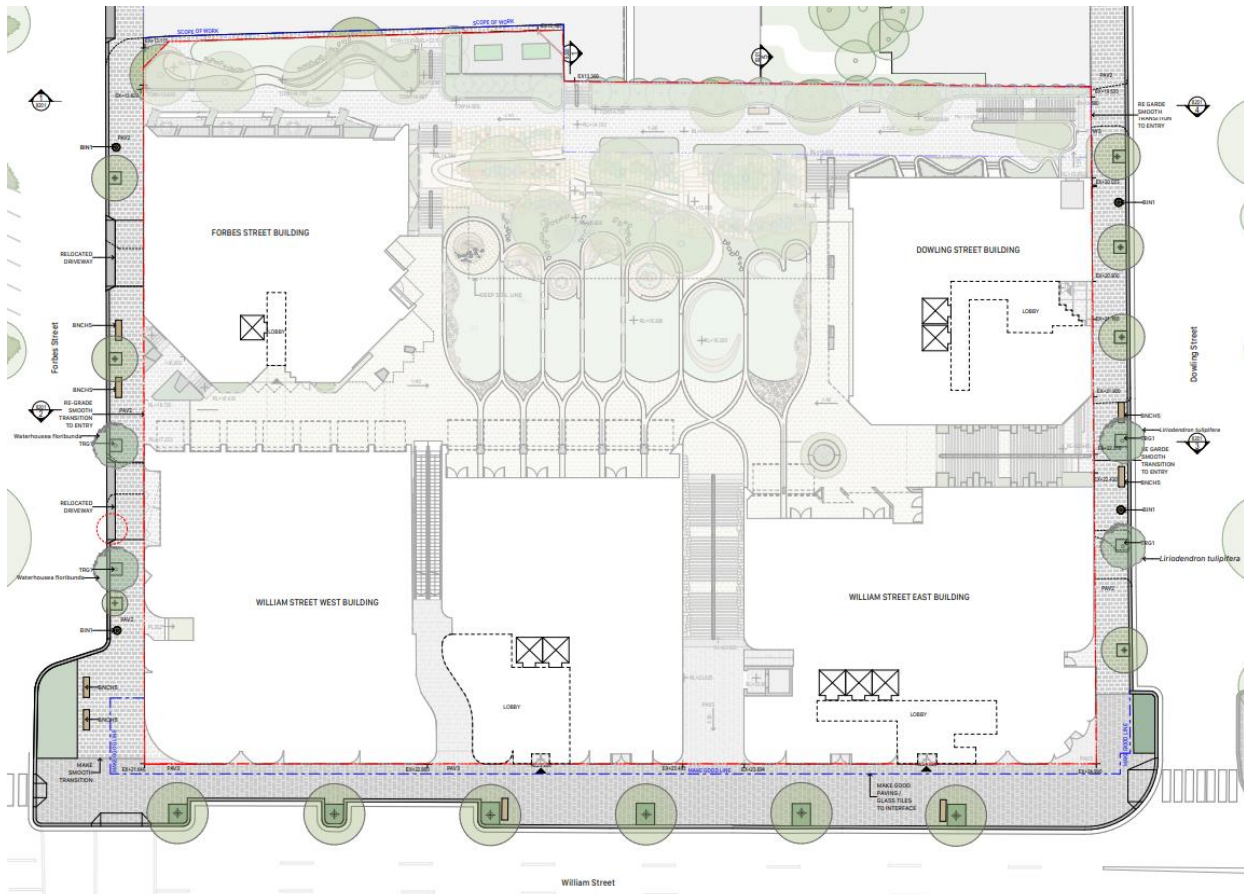


Source: FJC Studio

3.2.4.2. Public Domain and Street Trees

The proposed development involves improvements to the public domain. Re-paving of the footpaths surrounding the development is proposed with new concrete unit pavers to CoS specification. The public domain features additional amenity, with new bench seating and street bins proposed. There are no new street trees proposed on William Street, but there are four (4) additional street trees to be planted across the Forbes Street and Dowling Street frontages. These will coincide with the thirteen existing trees that are to be retained, with one existing tree on Forbes Street requiring removal. Residential and retail entries are accessible from the site's public frontages. These active edges lead to generous through-site links, guiding people across the site.

Figure 22: Public Domain Concept Plan



Source: FJC Studio

3.2.4.3. Landscaping and Planting

The landscape strategy for the site is designed to respond to local environmental conditions and enhance amenity for both residents and the public domain. The proposal provides a total of 826sqm of deep soil zones and 2,702sqm of soft landscaping, equating to 43% of the site area. The design includes 15.3% canopy cover.

The design incorporates native and locally endemic species suited to the Harbour context and existing micro-climatic conditions, maximising environmental performance, amenity, and integration with the surrounding area.

Key features of the landscape and planting strategy include:

- Native and drought-tolerant species selected for low water use, resilience to wind and sunlight exposure, and reduced maintenance requirements.
- Façade planting incorporating cascading and vertical species, including the Sydney Rock Orchid, contributing to biodiversity, seasonal interest, and visual amenity.
- Large tree planting within deep soil zones, delivering shade, canopy cover, and improved micro-climatic conditions.
- Edge planting responding to solar and wind exposures across all site frontages, softening building interfaces, enhancing privacy, and reducing perceived bulk and scale.
- Planters and landscaped buffers within communal outdoor spaces to improve acoustic performance, provide screening, and frame key outlooks.
- Application of CPTED principles, ensuring planting contributes to safety, visibility, and passive surveillance.

Figure 23: Planting Built Form Integration



Source: Studio Bright



Source: FJC Studio

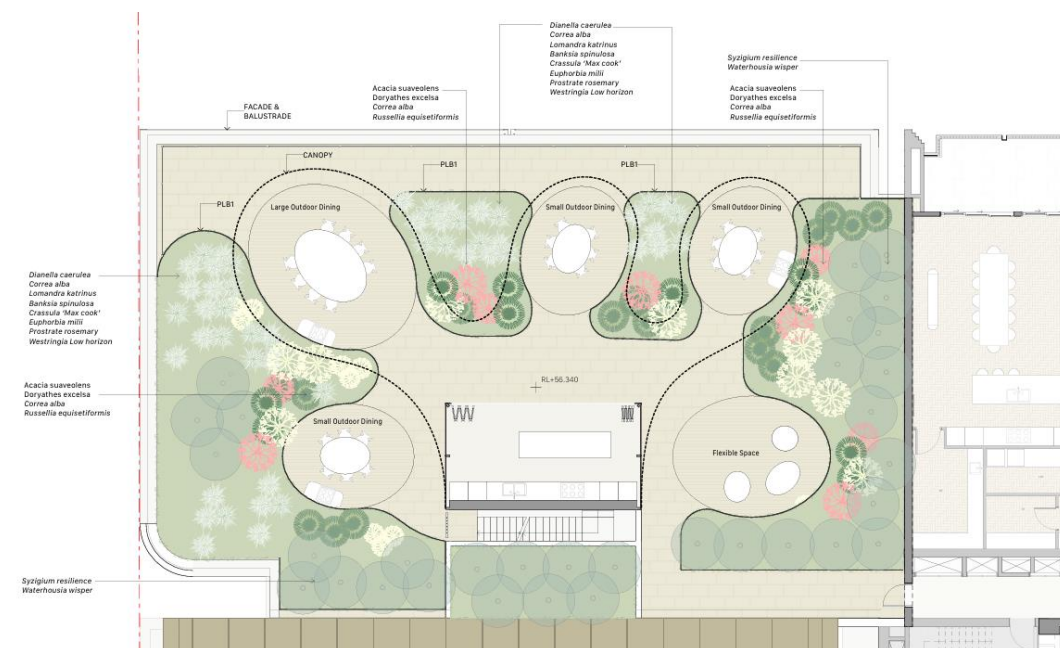
3.2.5. Communal Terrace

The communal terrace located on the rooftop of the William Street West building is designed to foster a sense of community among residents. It features outdoor dining areas and smaller gathering spaces, offering views of the harbour and city. The terrace provides light, privacy, equitable access, and wind protection, whilst blending functionality with a thriving ecosystem of native plants and habitats.

This space is available to all residents to enjoy the views, enhanced by natural shading and landscaped areas. The lower roofs of northern buildings feature landscaped green roofs which enhance the appearance to the William Street buildings which overlook.

The design aims for a cohesive look using plant species that regenerate local ecological communities, reflecting collaboration with First Nations Consultant Bangawarra. The planting strategy involves selecting specific species to create a unified design that promotes habitat creation, biodiversity, and a connection to Country.

Figure 24: Level 9 Communal Terrace



Source: FJC Studio

3.2.6. Demolition and Earthworks

The site currently accommodates several structures that will require demolition and removal to facilitate the project. These include a 5-storey commercial building and the Bayswater Car Rental building, which comprises a part 2 and 3 storey showroom and private car park.

Site preparation works will include demolition of the existing buildings, the installation of site services, and earthworks to construct the 4 level basement structure.

All earthworks and excavation waste will be managed in accordance with the accompanying Demolition and Construction Waste Management Plan.

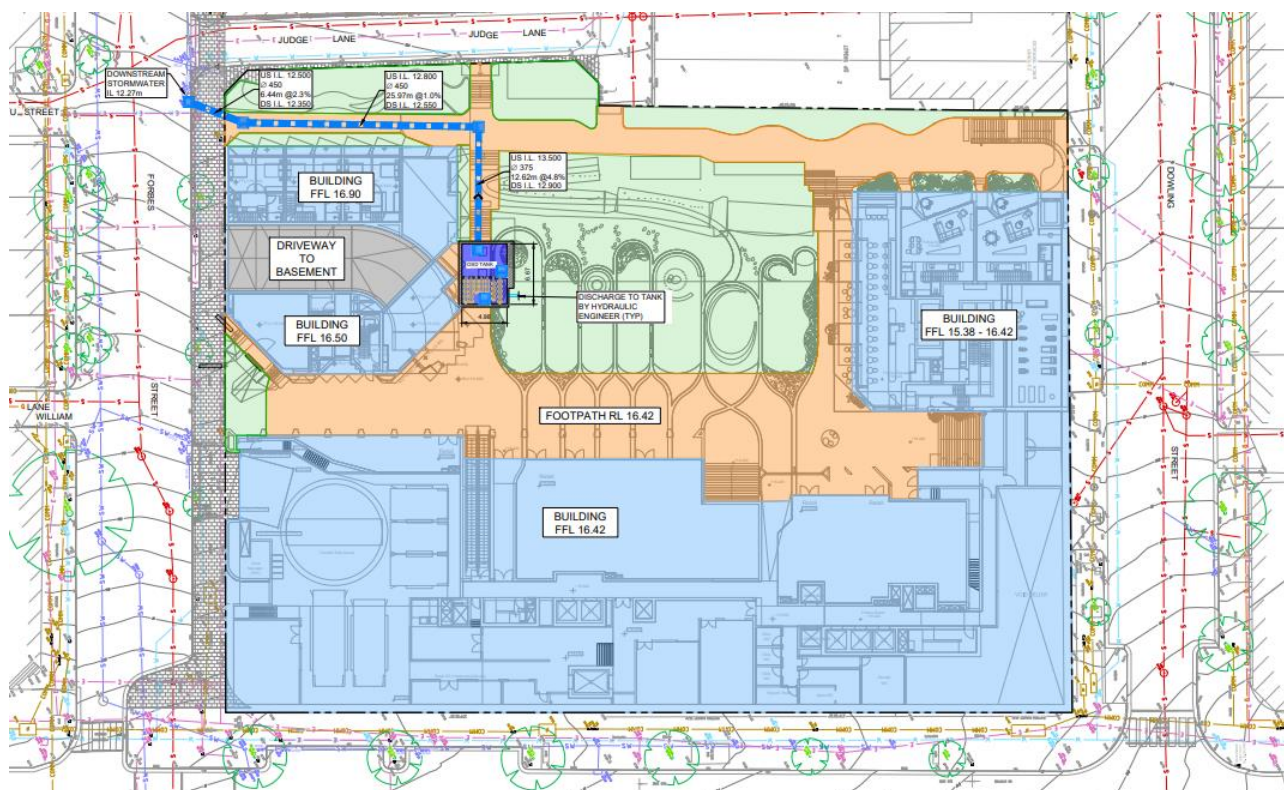
3.2.7. Stormwater Management

The proposed stormwater management system is detailed in the accompanying Integrated Water Management Plan and Stormwater Plans prepared by TTW Engineers.

An OSD tank located within basement 01 which will connect to the existing stormwater discharge point to the northern periphery of Forbes Street.

The proposed stormwater management system comprises a 20kL rainwater tank, StormFilter cartridges within the OSD chamber, and raingardens proposed to the northern edge of the park space allowing for the capturing and filtration of water.

Figure 25: Stormwater Plan



Source: TTW Engineers

3.2.8. Transport and Parking

The proposed development results in a reduction in vehicular cross overs within the site from six points to two separate entries off Forbes Street. The following traffic and parking arrangement is proposed:

- 1 vehicular access to basement off Forbes Street for residents and visitors.
- Basement parking for 340 car spaces, including:
 - 289 residential spaces + 10 visitors

- 32 retail spaces
- Separate loading and service area off Forbes Street, accommodating MRVs up to 10.5m with forward entry and exit.
- 273 bicycle spaces and end-of-trip facilities.

3.2.9. Development Timing

Construction of the proposed development will occur in the following indicative stages:

- Site establishment/demobilisation.
- Demolition.
- Bulk Excavation.
- Structure; and
- Fit out and Finishes.

The construction program is estimated to have a duration of approximately three years. A detailed construction program will be developed by the appointed builder prior to the commencement of any works.

All construction works associated with the proposed development will be carried out during standard construction hours:

- Monday to Friday: 7:00am to 5:00pm.
- Saturday: 7:00am to 3:00pm.
- Sunday: Subject to Out of Hours Permit Approval; and
- Shift/Night Works: Subject to Out of Hours Permit Approval.

In accordance with the current development consent conditions for Infill Affordable Housing projects, the development is required to commence within two years of consent being granted.

4. 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 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)*
- *Sydney Local Environmental Plan 2012*
- *Sydney Development Control Plan 2012*

Consideration is also required to be given to the following matters:

- *Voluntary Planning Agreement*

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.

4.1. Statutory Requirements

The following sections provide a summary of the relevant statutory requirements having regard to the *State Significant Development Guidelines*. A detailed statutory compliance table for the project is provided at **Appendix C**.

4.1.1. Power to Grant Approval

The legal pathway under which the consent is sought, why this pathway applies, and the relevant consent authority is outlined in **Table 12**.

Table 12: Power to Grant Approval

Matter	Consideration
Declaration of SSD	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 (Appendix H). The proposal also proposes 15% GFA as affordable housing. As such the proposal is SSD.
Consent Authority	In accordance with Section 4.5 of the EP&A Act, the Minister is the consent authority, unless the development is of a kind for which the Independent Planning Commission is declared the consent authority by an environmental planning instrument.

4.1.2. Permissibility

The permissibility of proposed development is outlined in **Table 13**.

Table 13: Permissibility

Matter	Consideration
Land use(s)	Mixed Use Development with infill affordable housing
Land use zone(s)	MU1 Mixed Use Zone
Permissibility	The proposed development is classified as 'Mixed Use Development' which is permitted with consent in the MU1 mixed use zone.

4.1.3. Other Approvals

The other approvals required to carry out the project are outlined in **Table 14** below.

Table 14: Other Approvals

Matter	Consideration
Consistent Approvals S4.42 Of The EP&A Act 1979	Act
	Applies
	Fisheries Management Act 1994 (s144)
	No
	Coal Mine Subsidence Compensation Act 2017 (s22)
	No
	Mining Act 1992 (380A)
	No
EPBC Act	Petroleum (Onshore) Act 1991 (s24A)
	No
	Protection of the Environment Operations Act 1997 (s43)
	No
	Roads Act 1993 (s138)
	No
	Pipelines Act 1967
	No
Other Approvals	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.
	Biodiversity Conservation Act 2016 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. 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. This request was received by the DPHI on the 02 September 2025 (Appendix KK).
Approvals Etc. That Do Not Apply	Fisheries Management Act 1994 – permit under s201,205 or 219
	Heritage Act 1977 – approval under part 4 or excavation permit under s139
	National Parks and Wildlife Act 1974 – an Aboriginal Heritage Impact Permit, s90
	Rural Fires Act 1997 – a bush fire safety authority under s100B

Matter	Consideration
	Water Management Act 2000 – a water use approval s89, water management work approval s90 or activity approval (other than an aquifer interference approval) s91.

4.2. Pre-Conditions to Granting Consent

Table 15 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 the EIS.

Table 15: Pre-Conditions

Statutory Reference	Pre-Condition	Section in EIS
Resilience and Hazards SEPP – clause 4.6(1)	Potential sources of contamination exist at the site but subject to the recommendations and the Remedial Action Plan (RAP), the site can be made suitable for the proposed mixed-use development outcome. 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.	Section 6.2
State Environmental Planning Policy (Transport and Infrastructure) 2021	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.	Section 6.1
	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. 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.	Section 6.1
	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. The proposed development is considered traffic generating development.	Section 6.1
State Environmental Planning Policy (Sustainable Buildings) 2022)	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.	Section 6.2
State Environmental Planning Policy (Housing) 2021	Section 15C provide that the in-fill affordable housing provisions of the Housing SEPP apply to development that includes residential development if – ▪ The development is permitted with consent under an EPI. ▪ The affordable housing component is at least 10%. ▪ The development is carried out in an accessible area.	The proposed land uses are permitted with consent under the SLEP. At least 10% of the total GFA is proposed to be affordable housing. The site is approximately 500 metres from Kings

Statutory Reference	Pre-Condition	Section in EIS
		Cross Station and meets the 'accessible area' threshold.
	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.	Section 6.1.2
	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.	A letter from Bridge Housing has been prepared in support of the proposed development, including the operation of the affordable housing. Please see. Appendix J for further information.
	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).	15% of the total GFA proposed is provided as affordable housing (60 units). Therefore, the proposal seeks to utilise the 30% FSR bonus available. As the full 30% bonus FSR is permitted under Section 16 (1) and the development comprises residential development, a 30% height bonus is also applicable to the proposed development. Refer to Appendix B .
	Chapter 4 of the Housing SEPP provides non-discretionary development standards for residential apartment development.	Compliance with the requirements the non-discretionary standards is provided at Appendix C .
Sydney Local Environmental Plan 2012	Objectives and land uses for MU1 (Mixed Use) Zone - Part 4 – Principal development standards. - Part 5 – Miscellaneous provisions. - Part 6 – Additional Local Provisions	Appendix C

4.3. Mandatory Considerations

Table 16 outlines the relevant mandatory considerations to exercising the power to grant approval and the section where these matters are addressed within the EIS

Table 16: Mandatory Consideration

Statutory Reference	Mandatory Consideration	Section in EIS
Consideration under the EP&A Act and Regulations		
Section 1.3	The relevant objects of the EP&A Act.	Appendix C
Section 4.15 (1)(a)(i)	All relevant EPIs will be addressed in the EIS, these include; <i>State Environmental Planning Policy (Planning Systems) 2021</i>	Section 4.1

Statutory Reference	Mandatory Consideration	Section in EIS
Relevant Environmental Planning Instrument	<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>	Section 6.2
	<i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>	Section 6.1.9 & Appendix C
	<i>State Environmental Planning Policy (Housing) 2021</i>	Appendix C
	<i>State Environmental Planning Policy (Sustainable Buildings) 2022</i>	Section 6.1 & Appendix C
	<i>Sydney LEP 2012</i>	Appendix C
Section 4.15 (1)(a) (iii) Relevant Development Control Plan	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
Section 4.15 (1)(a) (iiia) Any Planning Agreement or Draft Planning Agreement	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
Section 4.15(1) (b) The Likely Impacts of That Development	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
Section 4.15(1)(c)	The suitability of the site for the development.	Section 7
Section 4.15(1)(d)	Any submissions made in accordance with the Act or regulations	Section 7
Section 4.15(1)(2)	The Public Interest	Section 7
Section 4.24	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
Mandatory Relevant Considerations Under EPIs		
State Environmental Planning Policy (Resilience and Hazards) 2021	Section 4.6 – Contamination and remediation to be considered in determining development applications.	Appendix C
State Environmental Planning Policy (Transport and Infrastructure) 2021	Section 2.119 – Development with frontage to a classified road. Section 2.120 – Impact of road noise or vibration on non-road development Section 2.122 – Traffic-generating development.	Appendix C
State Environmental Planning Policy (Sustainable Buildings) 2022)	Section 2.1 – Standards for BASIX development and BASIX optional development.	Appendix C
State Environmental Planning Policy (Housing) 2021	Chapter 2, Part 2, Division 1 – In-fill affordable housing Chapter 4 - Design of residential apartment development.	Appendix C
Sydney Local Environmental Plan	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	Appendix C

Statutory Reference	Mandatory Consideration	Section in EIS								
Part 7 – Local provisions – general										
Development Control Plan										
Sydney Development Control Plan 2012	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								
Development Contribution										
Planning Agreement	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 <i>Council Development Contributions Plan 2015</i> should be required to be calculated based on the proposed SSDA, prior to the issue of the relevant construction certificate.	Section 2.3								
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 <i>City of Sydney Affordable Housing Program</i> 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: <table><tr><th>Rate</th><th>Amount</th></tr><tr><td>Per additional worker</td><td>\$2,544</td></tr><tr><td>Per additional visitor</td><td>\$6,251</td></tr><tr><td></td><td>\$9,218</td></tr></table>	Rate	Amount	Per additional worker	\$2,544	Per additional visitor	\$6,251		\$9,218	-
Rate	Amount									
Per additional worker	\$2,544									
Per additional visitor	\$6,251									
	\$9,218									

Statutory Reference	Mandatory Consideration	Section in EIS									
	<table> <tr> <td>Per additional resident</td><td>Per 1 bed dwelling (assumes 1.3 residents)</td><td>\$11,984</td></tr> <tr> <td></td><td>Per 2 bed dwelling (assumes 1.9 residents)</td><td>\$17,515</td></tr> <tr> <td></td><td>Per 3+ bed dwelling (assumes 2.7 residents)</td><td>\$20,000</td></tr> </table>	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	
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, 1,718sqm retail GFA is proposed. Therefore, the proposal generates a reduction of 3,727sqm 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. Community Engagement

The following sections of the report describe the engagement activities that have been undertaken during the preparation of the EIS and the community engagement which will be carried out if the project is approved.

5.1. Engagement Carried Out

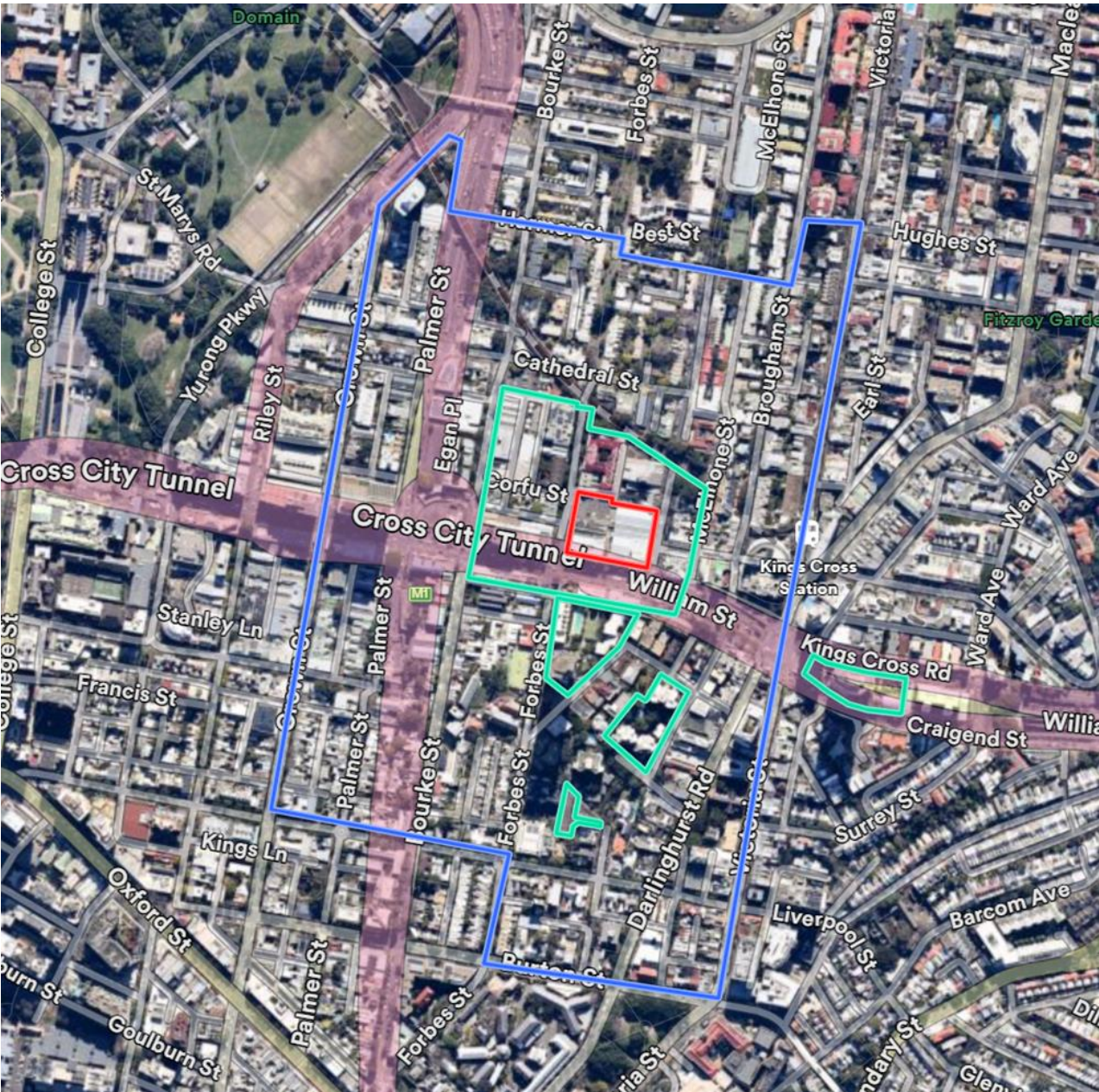
Community and stakeholder engagement has been undertaken by the Project Team in the preparation of the SSDA. Consultation was also undertaken with the certain stakeholders to inform the detailed assessment of key matters. To ensure engagement was consistent with DPHI's Undertaking Engagement Guidelines for State Significant Projects and compiled with the engagement requirements outlined in the SEARs, engagement was undertaken with:

Figure 26: Stakeholder Categories

Government Stakeholders	Community stakeholders
Department of Planning, Housing and Infrastructure - Planning and assessment team Design Integrity Panel - CoS Representative - Government Architect of NSW Representative - Applicant Representative CoS Council - Planning and assessment team - Central Sydney Planning Committee - Mayor and Councillors Parliamentary representatives - Mr Alexander Greenwich MP (Independent) – State Member for Sydney - Ms Allegra Spender MP (Independent) – Member for Wentworth Transport for NSW - Development Sydney team	Near neighbours: - Neighbours immediately adjoining the site on William, Forbes and Dowling Street Further near neighbours with anticipated view impacts 5-15 Farrell Avenue 1B Darley Street 184 Forbes Street 1A William Street Wider community - Residents and businesses as identified in Figure 8 Local community groups and organisations - Darlinghurst Residents Action Group 2011 Residents' Association - Potts Point and Kings Cross Heritage and Residents Society - Paddington-Darlinghurst Community Group - Kings Cross Community Centre - Kings Cross neighbourhood service centre - St Canice's Kitchen Surrounding schools - St Vincent's College - SCEGGS Darlinghurst - Sydney Grammar School - Goodstart Learning - KU Phillip Park Children's Centre - Darlinghurst Public School - Plunkett Street Public School - SDN Woolloomooloo - Children's Education & Care Centre - Sydney Distance Education High School

Source: Urbis

Figure 27: The Site and Surrounding Community

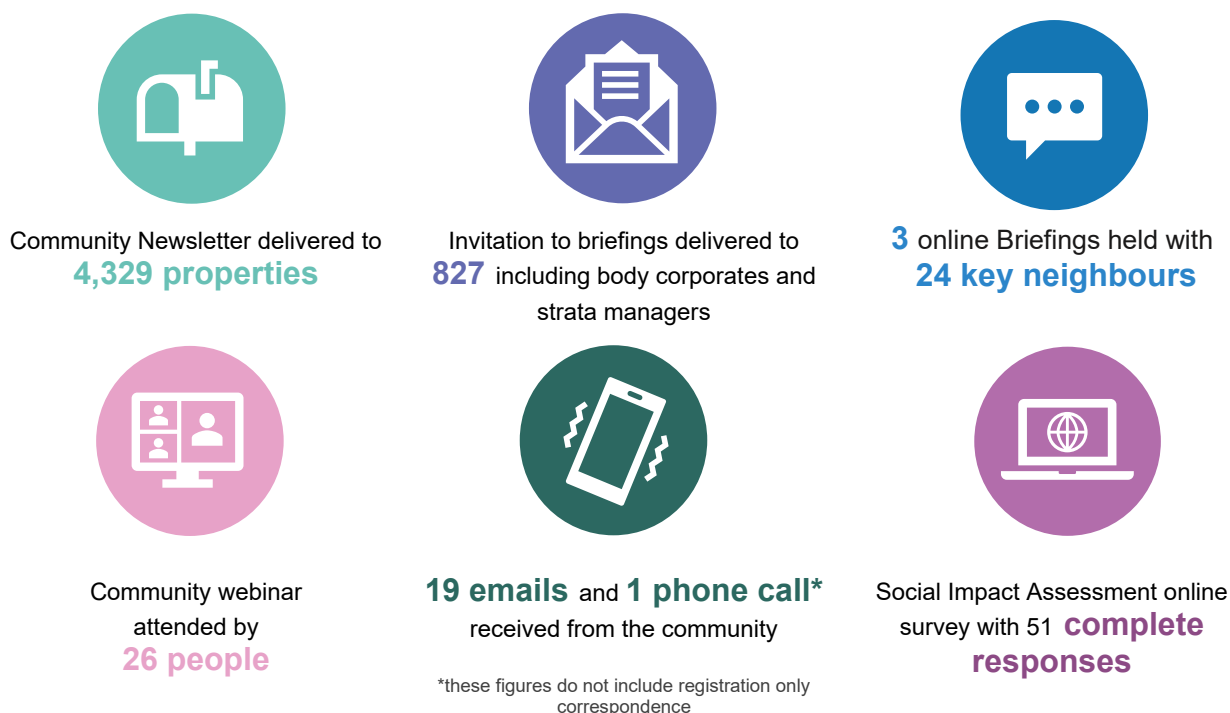


Source: Nearmap

- The site
- Key neighbours
- Wider community

The following engagement activities were undertaken to inform and consult the community on the proposal.

Figure 28: Engagement Activities



Source: Urbis

This engagement outlined above was consistent with the community participation objectives in the Undertaking Engagement Guidelines for State Significant Projects and complied with the community engagement requirements in the SEARs.

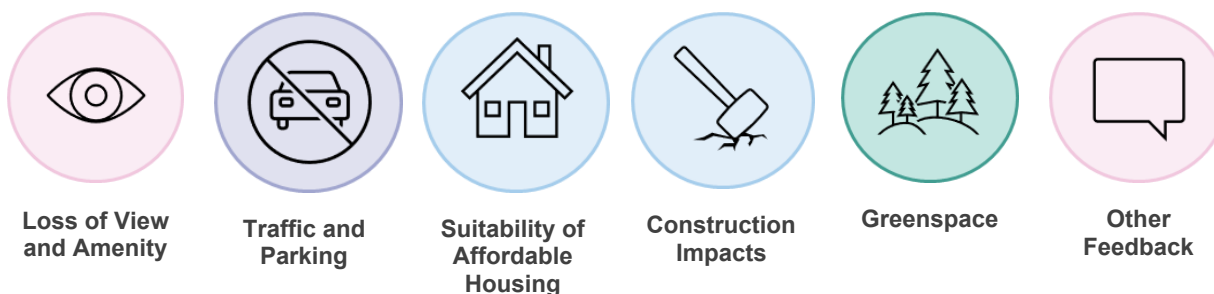
In accordance with the Regulations, the EIS will be placed on formal public exhibition once DPHI has reviewed the EIS and deemed it 'adequate' for this purpose. Following this exhibition period, the applicant will respond to any matters raised by notified parties.

5.2. Community Views

For all community stakeholders, potential impacts and/or areas of interest were identified as:

This section provides a thematic analysis of feedback received from members of the community during the engagement process – key themes are shown in **Figure 29**.

Figure 29: Community Feedback



This feedback has been addressed throughout the development of the EIS. Further details can be found in the Engagement Summary Table at **Appendix E**.

5.3. Engagement to be Carried Out

William Street Residential will continue to keep stakeholders and the community informed of the project approval process through the exhibition and determination phases by enabling the community to seek clarification about the project through the two-way communication channels

6. Assessment of Impacts

This section describes the way in which the key issues identified in the SEARs have been assessed. It provides a comprehensive description of the specialist technical studies undertaken regarding the potential impacts of the proposed development and recommended mitigation, minimisation and management measures to avoid unacceptable impacts.

Detailed tables have been provided within the appendices as outlined in **Table 17**. This information includes a reference to where these matters have been addressed in the EIS.

Table 17: Key Appendices

Key Appendix	Reference
SEARs compliance table	Appendix A
Statutory compliance table	Appendix C
Community engagement table	Appendix E
Proposed mitigation measures table	Appendix D

The detailed technical reports and plans prepared by specialists and appended to the EIS are individually referenced within the following sections.

6.1. Detailed Impact Assessment

This section provides a detailed assessment of key matters which may have a significant impact on the site and locality. It provides a comprehensive assessment of the relevant issues identified in the SEARs, and the mitigation measures required to avoid, mitigate, and offset the potential impacts of the project.

6.1.1. Design Quality

Clause 6.21C of the SLEP and the SEARs require the proposal to demonstrate design excellence. The original concept development application was subject to a competitive design process in accordance with the SLEP.

In preparation of this SSDA, a bridging design integrity process was undertaken in collaboration with DPHI, GANSW and comprised members of the panel who formed part of the initial design excellence competition. This process is detailed in **Section 1.2.4**.

As discussed in the accompanying DIP Report (**Appendix MM**), the project design addresses the DIP's findings and has incorporated their recommendations. The DIP confirm that the proposed scheme is capable of exhibiting "design excellence" subject to further comments. The DIP comments, provided as part of the DIP Report, have been responded to as part of the proposed SSDA as follows.

Table 18: Response to DIP

DIP Comments	Project Response
Design Excellence	
DIP 1 The DIP is confident that the site is well-positioned to accommodate the proposed additional density through the careful urban design analysis and strategic placement of massing on the site, enabling the delivery of affordable housing while remaining aligned with the design intent established during the Design Competition Stage. The Panel requests additional supporting information to better understand how the design can continue to achieve Design Excellence.	Noted. The final design proposed across the four buildings is extensively detailed within the Architectural Plans (Appendix B) and the Urban Design Report (Appendix L).
Height of Building and Built Form	

DIP Comments	Project Response
DIP 1 The DIP acknowledges the complexity of integrating additional height and massing within the site and considers that, overall, the proposed approach demonstrates a thoughtful response to context. The Panel encourages further refinement to ensure the built form achieves a cohesive and balanced outcome that minimises amenity impacts on surrounding areas and enhances the overall architectural quality. In this regard, the following points were raised: ▪ The design team should review the massing strategy in relation to the south-western (FJC) and north-western (Studio Bright) buildings to understand what options have been explored to ensure impacts on surrounding properties are minimised. It was acknowledged that a redistribution of floor space may also have other impacts (to be confirmed with any additional options tested), and the design team are encouraged to provide options and evidence of this design exploration in more detail. ▪ The DIP considers that the proposed 30% uplift could be integrated in a thoughtful and contextually responsive manner, reflecting a considered approach to site planning and built form. As the uplift of FSR is a major change to the competition brief the options should demonstrate different approaches rather than sub-options of one approach in order to satisfy the DIP that the optimal strategy has been employed.	Following the DIP 1 meeting the architectural team reviewed the built form and massing options for the sites uplift. This introduced 'option 5' and 'option 6' which was presented to the panel. These introduced options explored the impact on surrounding dwellings from a view sharing and overshadowing perspective. Detailed assessment compared the impact of each scheme which was presented during the DIP 2 presentation. Ultimately option 6 was selected as the preferred scheme due to the least impact on overshadowing and view of surrounding dwellings. These options are presented within the Urban Design Report (Appendix L).
DIP 2 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 DIP supports the progressing of the building envelope massing as presented (being Option 6)	The SSDA has progressed with the building envelope presented during the DIP process being Option 6.
Ground Plane and Public Space	
DIP 1 The DIP acknowledges that the proposed ground plane and public domain is a key element of the design, with strong potential to make a positive contribution to this part of eastern Sydney. Notwithstanding, the Panel identified several areas requiring further refinement. In particular, the DIP questions how the ground plane and public space would function equitably for all members of the community. The permeability and public links form an important principle of the public domain and ground plane activation for the public as well as the residents. The Panel requests that equitable access be more thoroughly explored to demonstrate the following can be achieved. ▪ Equitable access that is intuitive and visible ▪ Safe movement consistent with CPTED principles, both during the day and night that avoids using corridors into buildings where they are limited alternate pathways in the event of unsafe scenarios ▪ Inclusive circulation within the public domain	Following the DIPs feedback on the ground plane and public space, the design team worked with access and CPTED professionals to refine the design. These considerations involved ensuring the ground plane provided equitable access and safety. In response to the panel, the design includes on-grade access to all street frontages. Moreover, the design provides for a compliant outcome with accessible routes within 50m of an access point. The design has been considered to ensure best practice outcomes.
Materiality	
DIP 1 The DIP acknowledges the design intent and material approach proposed and encourages further refinement to enhance cohesion and strengthen the architectural outcome. In particular:	The architectural team acknowledged the DIPs comments in relation to the materiality of the design. A reworked scheme adopts the recommendations of the DIP to allow

DIP Comments	Project Response
▪ The DIP recommends that FJC Studio consider extending the selected façade material across both building elevations to enhance visual continuity and reduce the perceived bulk and scale. A consistent material treatment from the northern to the southern façade, drawing inspiration from the simplicity of the Tribe Studio Architects' building, may support a more cohesive outcome. ▪ While recognising the ambition of the design, the Panel noted that the current modulation of built form, scale, and material distribution has resulted in a somewhat visually fragmented appearance. The DIP encourages refinement of the façade treatment to better reflect the calm, considered, and civic qualities of the original competition-winning scheme. ▪ Revising the approach to present a unified and holistic architectural expression, rather than two distinct façades has the potential to significantly strengthen the overall design resolution. ▪ The new roof forms on the south of the FJC buildings were an additional architectural element. Other options should be explored and the floor plans included for review. The reliance on western sun is of concern.	for a more consistent treatment of the northern and southern facades of the William Street buildings. This refinement of the facade has achieved a holistic architectural expression The refined palette was presented and subsequently accepted by the DIP during the second meeting as noted below. During the second meeting, the architectural team presented three roof options. These were a 'floating' roof, a stepped form, and a slopped roof. Each roof form was accompanied by a list of associated benefits or impacts. Specifically in relation to overshadowing and solar access of surrounding dwellings. The proposed sloping roof subject to this application was preferred because it reduces overshadowing, avoids high-level south-facing terraces, and can conceal roof services such as lift overruns and ventilation.
DIP 2 The materials, details and colours have been successfully developed. The buildings each display their own character whilst contributing positively to the whole. The detailing has been refined and applied more consistently to the facades whilst responding to the requirements of the different orientations.	The proposed scheme retains the material palette presented at the DIP 2 meeting. This is described in detail in the Architectural Plans (Appendix B) and the Urban Design Report (Appendix L).
Affordable Housing	
DIP 1 The DIP recognises the significant benefits it offers through the delivery of affordable housing, alongside an improved overall design outcome. While the planning and design of the affordable housing apartments are still being resolved, the Panel members are of the view that more careful consideration needs to be given to the location of these to provide a more equitable amenity and inclusive housing outcome. The DIP would recommend more engagement with the nominated Community Housing Provider to assist with this, and understand their long-term management requirements in more detail. The percentage of all units that have compliant solar access is the percentage that should be applied to the affordable housing units.	During the DIP process the design team reviewed the affordable housing locations. This resulted in a redistribution of the location of the affordable housing units across the buildings and was presented to the panel in DIP 2. The mix of affordable housing and locations was adjusted to: ▪ increase the number of affordable units receiving 2 or more hours solar access in mid- winter (52%). - Decrease in the number of affordable units receiving less than 15 minutes of sun access in mid winter. ▪ increase in cross ventilated affordable apartments. ▪ reduce the noise affected affordable apartments. ▪ provide more equitable access to views. The Urban Design Report (Appendix L) provides a breakdown of the affordable housing units within the development.

DIP Comments	Project Response
DIP 2 The DIP acknowledged the design team's efforts to improve solar access within the affordable dwellings between 9am and 3pm at mid-winter. While there has been a substantial increase from 30% at the first DIP session, to 52%, the DIP continued to raise concern as to whether this was acceptable. Ultimately, the DIP formed the view that anything less than 60% solar access to the affordable housing units was not acceptable. The preferred outcome remains 70% to meet ADG guidelines. With consideration to the above, the DIP recommends that the design team increase the provision of solar access to the affordable housing units.	Following the second DIP meeting, the design team refined the arrangement of affordable housing units to provide increased solar access of at least 60%. The SSDA provides for a design whereby 162 apartments will receive more than 2 hours of sun during winter solstice. 29 of these units are the affordable housing product and 48.3% of this product will receive 2 or more hours solar access. This figure constitutes 71.4% of the overall development and therefore has addressed the DIPs comments and the ADG requirements.
CPTED Safety and Amenity	
DIP 2 The public accessway from the courtyard to the lift to William Street should be visually connected to the adjacent retail space to enable continued passive surveillance.	Following receipt of the DIP feedback, the retail uses facing the laneway have been amended to provide for an active frontage to the laneway.
Thermal Comfort	
DIP 2 The DIP supported the architectural ambition of the proposed development particularly the strategic roof design of the south facing penthouses fronting William Street. It is acknowledged that this design results in an outcome which mitigates amenity impacts. However, the design of the rooftop presents concerns regarding the thermal performance of these apartments as well as the ongoing maintenance of the glazing elements. Specifically, the Panel recommends that further consideration is made to the current shading strategy and the extent of exposed glazing in managing heat gain and occupant comfort across seasons. Further, the DIP raised concerns regarding the thermal implications of southwest-facing glazing and sloped roof forms, including uncertainty about their long-term performance and maintenance. The Panel recommends that the glazing to these areas is vertical, accessible by the occupants for cleaning and shaded externally. The desired roof forms can be maintained through the design of the shading elements. The Panel encourages further consideration on these materials to ensure the proposal delivers high-quality thermal comfort outcomes for future residents. The DIP acknowledges that the development will be supported by a BASIX report and the thermal performance of these units will be required to achieve compliance with the Sustainability SEPP 2022.	The DIPs comments on the thermal performance are noted. The BASIX report and ESD principals have ensured that these apartments achieving compliance with the thermal performance requirements. Please refer to the BASIX report at Appendix U.

6.1.2. Built Form and Urban Design

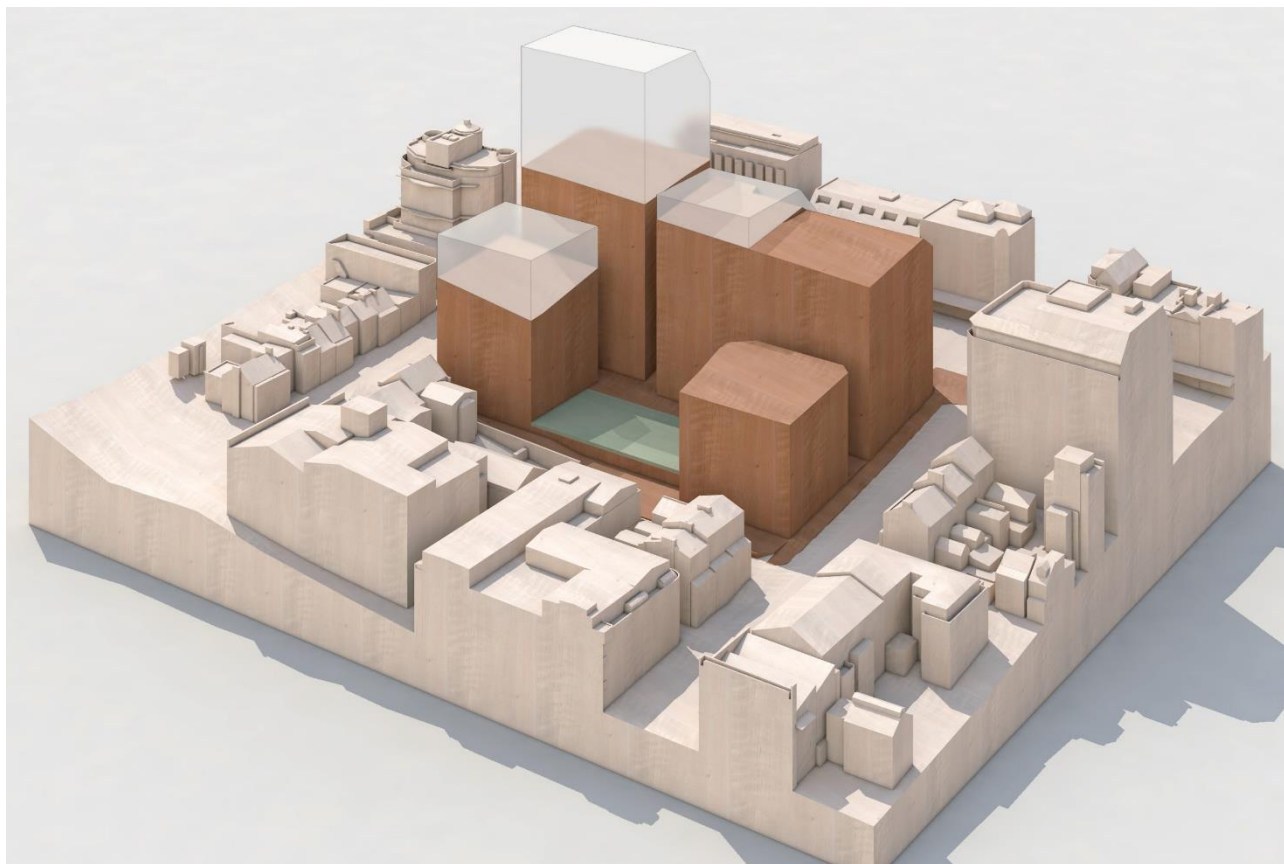
The William Street precinct is undergoing a significant transformation aligned with Housing SEPP, which encourages design excellence and affordable housing delivery. The proposed built form is carefully articulated to enhance both internal residential amenity and the surrounding public domain, responding to the site's unique topography and cultural context.

The development incorporates key urban design strategies that reflect the evolving character of Woolloomooloo and its transition from fine-grain terrace housing to mid- and high-rise mixed-use buildings. These include:

- Tower forms – The proposal uses stepped building forms that transition in scale from William Street to the northern buildings along Forbes and Dowling Street, enhancing view sharing and solar access.
- Architectural articulation – Buildings are composed of distinct volumes with recessed balconies, sculpted openings, and integrated planter boxes to create rhythm, privacy, and visual interest.
- Active street frontages and enhancing public spaces – Retail, residential lobbies, and pedestrian entries activate all street edges, while a central sunlit park and laneway network improve public amenity.
- Greening – Extensive landscaping is integrated from ground level to rooftops, including deep soil zones, green roofs, and native planting.
- Building height – Building height has been strategically placed, with massing carefully redistributed to preserve solar access and minimise view impacts on neighbouring properties.
- Communal open space – Rooftop terraces and shared landscaped areas are designed for usability, privacy, and panoramic views, contributing to a high-quality living environment.

The architecture is carefully articulated to address multiple aspects, with the largest frontage to William Street expressed through a linear mass that is scaled and eroded to reduce visual bulk, while the Dowling and Forbes Street frontages adopt a lower scale to mediate the transition to the surrounding residential context. From an architectural perspective, the proposal improves the urban context by addressing the fragmented public realm and lack of green space in Woolloomooloo through the introduction of a large, sunlit, publicly accessible park and a network of pedestrian laneways that enhance permeability and connectivity.

Figure 30: Proposed Built Form



Source: Urban Design Report

6.1.2.1. Tower Strategy

The tower form has evolved in response to designing with Country and addressing the key items raised in the design competition. Moreover, the tower form considers the retention of amenity whilst responding to a challenging site. As detailed in the Urban Design Report (**Appendix L**), the key articulation components include:

The following built form principles inform the tower design:

- Split massing: the development is split into four building forms of varying scale. The four towers to each corner of the allotment have allowed for the delivery of the key public space in the centre of the development, as well as the provision of the pedestrian links allowing for permeability through the site.
- Proportion: The development's proportions respond to the surrounding context, with taller forms along William Street stepping down to lower-scale buildings on Dowling and Forbes Streets, clearly expressing the hierarchy of uses and enhancing view sharing and solar access.
- Landscaping: Generous landscaping is integrated throughout the proposal, including a central sunlit park, deep soil zones, green roofs, and communal rooftop terrace on level 9 that offer flexible, year-round outdoor spaces for residents.
- Expression: The architectural expression is defined by articulated facades with recessed balconies, sculpted openings, and integrated planter boxes, drawing inspiration from Country and local heritage through materiality and texture.
- Plant Space: Roof-level plant equipment is discreetly integrated into sculpted roof forms, maintaining clean elevations and supporting passive design strategies while preserving amenity and views.

Figure 31: Tower Strategy



Source: FJC Studio



Source: FJC Studio

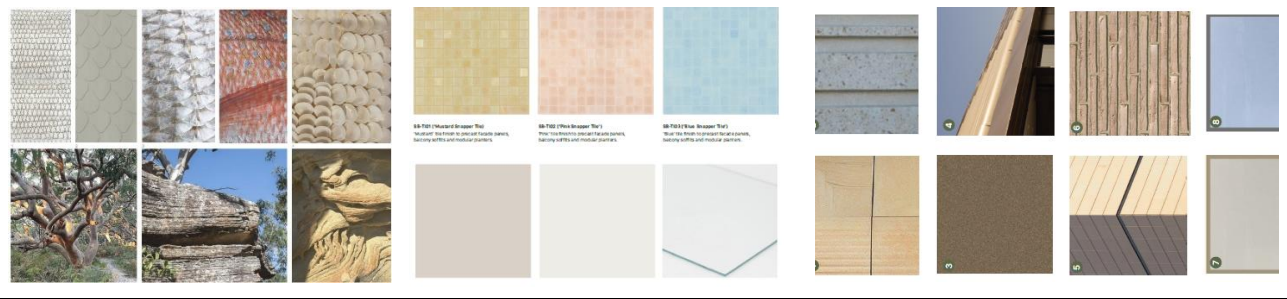
6.1.2.2. Materials and Finishes

The materials and finishes of each building have been thoughtfully selected to reflect the unique vision of their respective designers while honouring the Woolloomooloo locality. Together, each of the standalone buildings provide an architectural design which incorporates a considered materials and finishes. Ultimately resulting in a development that embodies the vision of modernity whilst respecting and celebrating the rich heritage of Woolloomooloo.

The architectural plans (**Appendix B**) include a detailed schedule of external building materials, colours and finishes. This schedule is replicated in

Table 19 below. All external building materials have been carefully selected for their suitability with the surrounding context, and well as for their quality and durability.

Table 19: Proposed Material Palette

Tribe Studio	Studio Bright	FJC
The Dowling Street building adopts a layered, sustainable material palette inspired by the escarpment landscapes of Gadigal Country, combining precast concrete, stone rubble, recycled glass, and salvaged materials. This approach embeds cultural references, durability, and tactile richness, reinforcing both connection to Country and the quality of the public realm.	The Forbes Street building employs a robust, contextually responsive material palette that references Woolloomooloo’s sandstone formations and cultural setting, combining textured precast concrete, exposed stone aggregate, and custom “Snapper Tiles” inspired by native shells and fish scales. Colour-matched aluminium framing, woven-pattern balustrades, and integrated greenery reinforce cultural narratives while delivering a contemporary and tactile architectural expression.	The William Street building adopts a material palette that integrates with the local landscape, neighbouring buildings, and inter-war architecture of Potts Point, Darlinghurst, and Woolloomooloo. Sandstone bases, brick facades, and precast panels in sandstone and lighter tones are articulated with embellished details, integrated planters, and bronze-coloured elements, balancing solidity to William Street with openness to the park.
		

6.1.2.3. Communal Spaces

The proposed development incorporates a range of private communal indoor and outdoor spaces, distributed across various levels of the site. These include:

- Communal open spaces:
 - Rooftop garden and communal kitchen
- Communal indoor spaces:
 - Wine cellar store
 - Gym
 - Reading room
 - Media room
 - Music room
 - Golf simulation room

The communal spaces have been thoughtfully designed to offer a balance of outdoor environments and smaller, intimate indoor gathering areas. These communal areas also support and provide a secondary function to the publicly accessible park which provides a broader offering beyond just the residents. The combination of the communal indoor and outdoor spaces and the publicly accessible park equate to 27.2% of the site.

Extensive design exploration was undertaken to maximise communal open space within the site constraints. One such consideration involved introducing rooftop communal areas on the two northern buildings. However, this solution posed significant privacy concerns due to proximity between building forms.

Instead, the design delivers a site-specific solution that focuses on high-quality, usable communal spaces. While not all of these spaces are classified as 'outdoor' under the strict ADG definition, they provide meaningful, functional areas that respond appropriately to the site's built form and urban context.

Importantly, all communal spaces are accessible to all residents and are further complemented by a generous provision of publicly accessible open space throughout the site. This integrated approach ensures a high level of residential amenity and supports community interaction while responding pragmatically to site constraints.

6.1.2.4. Connecting with Country

The design of the William Street redevelopment is deeply informed by Aboriginal cultural knowledge and the principles of Connecting with Country. Led by Bangawarra and collaborating architects, the project integrates Indigenous perspectives to create a place that respects and reflects Snapper Country (Wulumay Dool).

Key influences on the design include:

- **Cultural Landscape:** The site's natural features, such as sandstone escarpments, water systems, and native flora are central to the design, echoing traditional relationships with Country.
- **Cultural Narratives:** Elements like the Gynea Lily, turbo shell fishhooks, and dilly bag stitches are embedded in architectural and landscape features to honour local stories and knowledge.
- **Materiality & Form:** Design choices reflect Country's textures and patterns, using materials and forms that evoke ecological and cultural connections.
- **Ecological Resilience:** Native planting and pollinator corridors support biodiversity and reflect traditional land care practices.
- **Cultural Safety & Inclusion:** The process prioritised Aboriginal-led consultation, ensuring cultural knowledge holders guided the design and were properly acknowledged.

The project aligns with the Connecting with Country Framework, addressing cultural heritage, ecological health, community wellbeing, and cultural competency. For complete details, please refer to **Appendix P** whereby a complete Connecting with Country report is located.

6.1.2.5. Integration of Affordable Housing

The proposed development delivers a mix of affordable housing typologies, comprising one- and two-bedroom units distributed from Level 1 within the northeastern building through to Level 4 fronting William Street (refer to **Figure 32**). The affordable housing provision includes:

- Total of 60 apartments equating to 4,949sqm
- 42 x one-bedroom units
- 18 x two-bedroom units
- 48.3% of affordable units achieve a minimum of two hours solar access during mid-winter
- 67% of affordable units are designed to enable cross ventilation
- Affordable units are provided with equitable access to views

The affordable housing apartments will have access to shared facilities and amenities, including shared basement, lift cores and communal indoor and outdoor spaces across the development.

Figure 32: Affordable Housing Distribution



Source: FJC Report

6.1.3. Environmental Amenity

A detailed analysis has been undertaken by the technical consultant team to demonstrate that the proposed development will achieve a high degree of amenity without creating adverse amenity impacts to surrounding development and public open spaces.

For reference, several of these matters were addressed during the concept development application stage. The following section provides an updated assessment of any additional impacts relative to the previously approved scheme. As demonstrated below, the revised design results in negligible additional impacts.

6.1.3.1. Solar Access

The Urban Design Report (at **Appendix L**) demonstrates that:

- 71.4% of apartments receive 2 hours of direct sunlight to living areas and balconies (162 out of 227). This meets the minimum 70% ADG design criteria.
- A total of 38 out of 227 apartments receives no direct sunlight (16.7%). This is 1.7% short of achieving a compliant outcome the ADG criteria being 15%. However, this is offset by the fact that greater than 70% of the overall apartments receive more than 2 hours solar access.

The overall layout and design of the built form results in a number of south facing units. Whilst these units are compromised on solar access, the apartments themselves retain high quality amenity. In particular, some of these apartments have views to the CBD and to Potts Point, including the iconic Coco-Cola sign, which provides for a high-quality outlook.

This high level of internal amenity has been achieved through apartment orientation and layout to maximise access to daylight, cross ventilation as well as views towards Sydney CBD, Sydney Harbour and the site's surroundings.

6.1.3.2. Natural Ventilation

The architectural team, in collaboration with consultants Renzo Tonin and Flux, have developed a comprehensive natural ventilation strategy for the proposed development. The site is located within a challenging acoustic environment due to its direct interface with William Street, a classified road with high levels of traffic noise.

Ventilation performance was assessed using dynamic thermal and multi-zone airflow modelling (**EDSL TAS**), in accordance with the *City of Sydney Alternative Natural Ventilation in Noisy Environments Performance Pathway*. The Equivalent Open Area (**EOA**) for each apartment was calculated conservatively, accounting for losses through flyscreens, acoustic louvres, and plenum chambers.

Apartments identified as 'noise affected' along William Street were evaluated separately under this pathway. To mitigate traffic noise while maintaining natural ventilation, these dwellings incorporate acoustically attenuated plenum ventilation systems ranging from 2.8m to 4m in height, integrated into the façade and balcony design. Three plenum typologies (P1, P2, and P3) were employed, tailored to apartment orientation and exposure.

The results of this assessment for the noise affected apartments demonstrate that all typical apartments comply with the CoS requirement of 10 L/s x (number of bedrooms + 1) for 90% of the time. The results also show that all habitable rooms meet the minimum 10 L/s of airflow rate for 90% of the time.

For the remaining apartments, the majority achieve natural ventilation via dual-aspect crossflow, while a smaller number of upper-level apartments rely on clerestory rooftop windows. These apartments are not dependent on mechanically assisted ventilation.

The ADG requires at least 60% of apartments within the first nine storeys to achieve natural cross ventilation, with apartments above this height only compliant where balcony enclosures enable effective ventilation and cannot be fully enclosed. The development demonstrates compliance with these requirements, as outlined below (first nine storeys only):

- Apartments with natural cross ventilation: 64 (60%) – excluding noise-affected balconies
- Apartments with noise-affected balconies: 48
- Apartments without natural cross ventilation: 43 (40%)

This strategy supports compliance with both the ADG, ensuring that all apartments, regardless of acoustic exposure, achieve appropriate levels of natural ventilation and internal amenity.

6.1.3.3. View Impact

A Visual Impact Assessment (**VIA**) has been prepared by Urbaine Design Group (**Appendix S**). The purpose of the VIA is to analyse potential visual impacts of the proposed built form through a visual analysis of the development from key viewpoints within the public domain. The VIA considers likely future development and includes photomontages and perspectives showing the proposed development in its context.

The site is located within a highly sensitive visual catchment, with views available to the Sydney Opera House, Sydney Harbour Bridge, St Mary's Cathedral, the Domain, the city skyline, and the harbour foreshore.

The previous concept approval over the site was informed by extensive view studies, including 3D modelling, photomontages, and on-site inspections, which shaped the building envelope. This envelope strategically positioned building heights across the four buildings which incorporated stepping and chamfering to promote equitable view sharing.

The low and mid-rise residential apartments to the south and southeast of the site are most affected by potential view impacts. A number of these properties hold views to icons and desirable land and water views.

Whilst the protection of views are considerations and not bound by specific planning controls, during the concept application the CoS Council undertook their own assessment to understand the view loss concerns of these properties. In doing so, Council ultimately determined that in the case of the proposed envelope, a degree of loss would be inevitable. Moreover, it was determined that the massing design could not have been any more skilful to mitigate the impact of view loss to the southern properties. The development envelope was considered to achieve an acceptable balance between development potential and equitable view outcomes.

When considering view impacts, it is important to understand the relevance of view sharing principles established in the Land and Environment Court of NSW Judgment *Tenacity Consulting Pty Ltd v Warringah Council* [2004]. These are often referred to as tenacity principles. The judgement noted that view sharing is invoked when a property currently enjoys views and a proposed new development would share that view by transferring some of it to the occupants of the new development. In order to determine if the extent of view sharing would be reasonable, a four-step assessment process was set out in the Judgement. This is as follows:

- Step 1: assessment of views to be affected.
- Step 2: consider from what part of the property the views are obtained.
- Step 3: assess the extent of the impact.
- Step 4: assess the reasonableness of the proposal that is causing the impact.

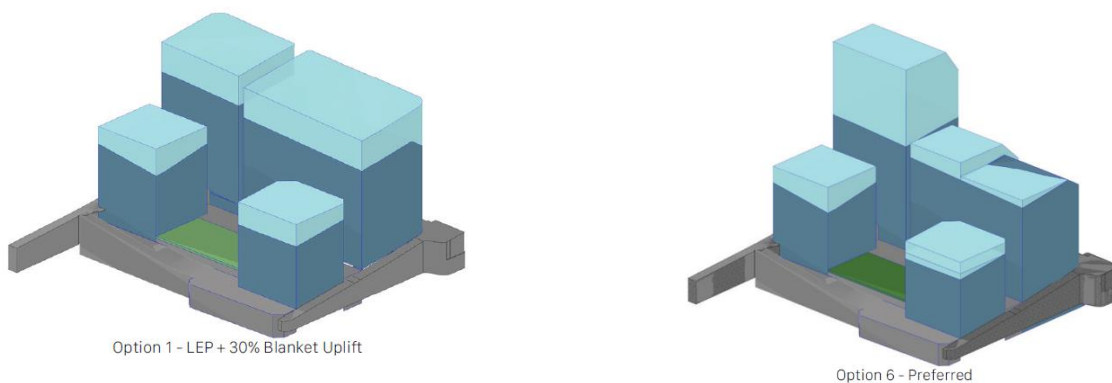
With consideration to the above, the following assessment involves consideration to the additional impact based on the increased uplift. These principles are applied to the proposed development in the following section.

The proposed scheme has been subject to several iterations of massing to ensure that the 30% infill affordable housing uplift is utilised in a balanced and contextually appropriate manner. A key design consideration has been the retention of significant and sensitive view corridors, while strategically accommodating additional height and bulk in less sensitive locations. This considered the previously assessed impacts during the concept application. The proposed design represents a deliberate and considered approach that protects critical views while facilitating uplift consistent with the site's strategic potential.

During this process, a scheme that included a blanket 30% uplift across the site was considered. This scheme was not progressed as it created several solar and view complications to the neighbouring developments. Following this, an additional five schemes were explored, distributing the 30% uplift across the different buildings, the key intention throughout was to provide the best outcome in terms of view sharing and overshadowing to the surrounding environment. This concluded in a selection of the proposed development which is known as option 6. Option 6 provides an envelope and height which retains either whole or partial views to the Harbour Bridge. The option 6 design was endorsed by the DIP which affirms this massing is the best possible solution in the sensitive view catchment.

Figure 33 below provides a comparison of Option 1 and Option 6 for clarity.

Figure 33: Massing Study



Source: FJC Studio

Source: FJC Studio

The VIA assessment evaluates the proposed scheme against the previously approved building envelope, with particular regard to the additional impact on identified views. Importantly, it provides a direct comparison between the approved and uplift scenarios, demonstrating that whilst there is some additional view impact, the proposed envelope outcome significantly mitigates the view affectation, compared to a standard 30% uplift scheme.

The assessment reviews 70 viewpoints, many of which do not experience an increased view loss as a result of the development. For reference, each view is depicted in **Figure 34** below.

Figure 34: Viewpoints Assessed



Source: Urbaine Design Group

The visual assessment reviews the approved concept envelope, the compliant infill affordable housing envelope, and the proposed SSDA envelope. These view comparisons provide a visual understanding of the considered design approach to retain views.

Assessment of visual impact considers two key aspects:

1. Loss of view elements (landscape, middle-distance and long-distance features); and
2. Loss of direct sky views.

While the value of a view is inherently subjective, relative values can be applied to enable consistent comparison. The VIA report applies a scale ranging from 0 to 15, allowing numerical values to be assigned to particular views for comparative purposes. This scale is informed by established tenancy principles and includes the following rankings:

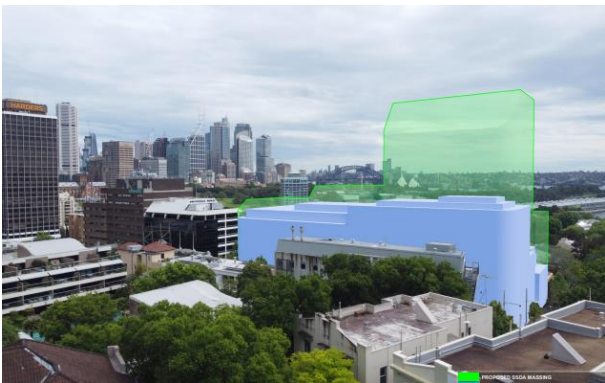
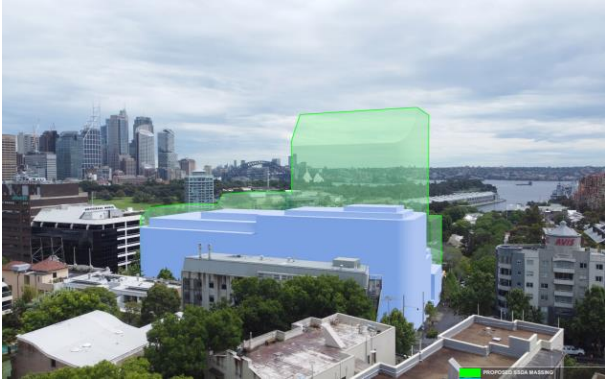
- Value 0 = Nil Impact
- Value 1 – 3 = Negligible Impact
- Value 4 – 6 = Minor Impact
- Value 7 – 9 = Moderate Impact
- Value 10 – 12 = Severe Impact
- Value 13 – 15 = Devastating Impact

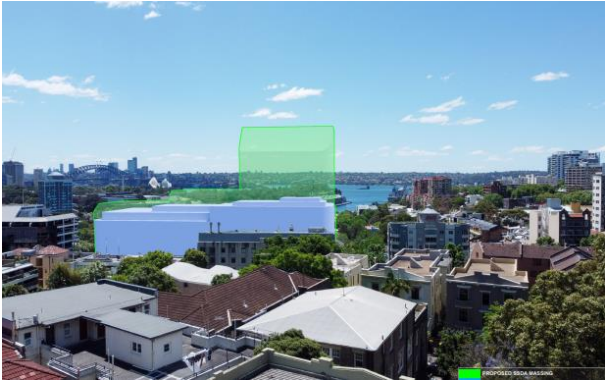
For completeness, please refer to **Appendix S**.

As a result of the strategic massing and skilful design to shift height from the western periphery of the site to the east, the proposal results in the retention of most high-value views in this area. As aforementioned, the western periphery of the site has been a key focus of the uplift design development, in order to mitigate any unreasonable view loss. Notably, of the 70 viewpoints assessed, 16 were categorised as Moderate, 6 as Moderate-to-Severe and 9 as Severe. These assessments relate to the increased visual impact from the proposed alternative massing, when compared to the approved concept envelope.

Table 20 below provides a summary of key views reviewed within the VIA. This table only draws attention to the comparison image of approved concept envelope and proposed uplift scheme. A complete assessment of all 70 viewpoints, as well as an understanding of a 30% uplift blanket scenario can be found in **Appendix S**.

Table 20: View Sharing Analysis

View	Assessment Scale	Outcome on View	View Comparison
Viewpoint 10	Value of View: High Extent of impact: Severe Visual Impact (beyond approved massing): 12 /15	A significant portion of the highest value area of the physical view is obscured by the proposal. However, the water, Fort Denison and a portion of the Woolloomooloo finger wharf remain visible. The Harbour Bridge and CBD view is also largely unimpacted.	
Viewpoint 11	Value of View: High Extent of impact: Severe Visual Impact (beyond approved massing): 12 /15	A significant portion of the highest value area of the physical view is obscured by the proposal. However, the water, Fort Denison and a portion of the Woolloomooloo finger wharf remain visible. The Harbour Bridge and CBD view is also largely unimpacted.	
Viewpoint 12	Value of View: High Extent of impact: Severe Visual Impact (beyond approved massing): 12 /15	A moderate portion of the highest value area of the physical view is obscured by the proposal. Specifically, the Opera House sails. However, the water, Fort Denison and a portion of the Woolloomooloo finger wharf remain visible. The upper arch of the Harbour Bridge and the CBD view are also unimpacted.	
Viewpoint 16	Value of View: High Extent of impact: Moderate to Severe Visual Impact (beyond approved massing): 10 /15	The proposal impacts upon a small area of the Opera House, distant ridgeline views and sky view. However, the water, Fort Denison and a portion of the Woolloomooloo finger wharf remain visible. The Harbour Bridge and CBD view is also largely unimpacted.	

View	Assessment Scale	Outcome on View	View Comparison
Viewpoint 17	Value of View: High Extent of impact: Moderate Visual Impact (beyond approved massing): 9 /15	The proposal impacts upon a small area of the Opera House, distant ridgeline views and sky view. However, the water, Fort Denison and a portion of the Woolloomooloo finger wharf remain visible. The Harbour Bridge and CBD view is also largely unimpacted.	
Viewpoint 18	Value of View: High Extent of impact: Moderate Visual Impact (beyond approved massing): 9 /15	The proposal impacts upon a small area of the Botanic Gardens, distant ridgeline views and sky view. However, the water, Fort Denison and a portion of the Woolloomooloo finger wharf remain visible. The Opera House, Harbour Bridge and CBD views are also largely unimpacted.	
Viewpoint 19	Value of View: High Extent of impact: Moderate Visual Impact (beyond approved massing): 9 /15	The proposal impacts upon a small area of the Botanic Gardens, distant ridgeline views and sky view. However, the water, Fort Denison and a portion of the Woolloomooloo finger wharf remain visible. The Opera House, Harbour Bridge and CBD views are also largely unimpacted.	
Viewpoint 47	Value of View: High Extent of impact: Moderate Visual Impact (beyond approved massing): 9 /15	The proposal impacts upon areas to the northern end of Sydney CBD. The Harbour Bridge and the Opera House remain visible.	

View	Assessment Scale	Outcome on View	View Comparison
Viewpoint 48	Value of View: High Extent of impact: Moderate-to-Severe Visual Impact (beyond approved massing): 10 /15	The proposal impacts upon areas to the northern end of Sydney CBD. A small area of the southern end of the Harbour Bridge is impacted, while the Opera House remains visible.	
Viewpoint 50	Value of View: High Extent of impact: Severe Visual Impact (beyond approved massing): 11 /15	The proposal impacts upon areas to the northern end of Sydney CBD. Almost the entirety of the Harbour Bridge is impacted, while the Opera House remains completely visible.	
Viewpoint 55	Value of View: Medium-to-high Extent of impact: Minor Visual Impact (beyond approved massing): 5 /15	The proposal impacts upon parts of the lower levels of the CBD towers, towards the northern end of the CBD. The view loss, caused by proposed envelope will impact upon fewer towers, but to a higher level, while opening up views to the south of these. No iconic elements are impacted.	

As demonstrated in the above extracts, a number of views are improved as a result of the strategic massing, as opposed to a blanket 30% uplift scenario. This includes key views to the Harbour Bridge and the Opera House. It is acknowledged that there are still a number of dwellings which have impacted views as a result of the development however, as mentioned above this impact has already been assessed and approved during the concept stages.

Applying the tenacity principles, the proposed scheme achieves an appropriate balance between facilitating growth and maintaining equitable view sharing outcomes. Compared to the previously considered envelope, the scheme introduces only modest changes in massing, with impacts that remain consistent with the Tenacity principles and within the parameters of reasonable view sharing.

6.1.3.4. Overshadowing

Overshadowing analysis has been undertaken by FJC studio and is provided in the Architectural Drawings that accompany this application (**Appendix B**). The diagrams illustrate the shadow cast by the proposed development at half hourly intervals between 9am and 3pm during the winter solstice. As mentioned in the above sections, the proposed concept application assessed an array of environmental impacts for the concept envelope, one of which was the overshadowing of the surrounding neighbourhood.

The original concept envelope sought to retain solar access at mid-winter to all surrounding residential apartment and specifically had minimal impact to the residential buildings fronting the opposite side of William Street. The proposed massing has sought to retain these reduced impacts in the uplift scheme.

Figure 35 below shows the shadow impacts at 30-minute intervals.

Figure 35: Shadow Diagrams (Winter Solstice)



Picture 5: June 21 9am



Picture 6: June 21 9:30am



Picture 7: June 21 10am



Picture 8: June 21 10:30am



Picture 9: June 21 11am



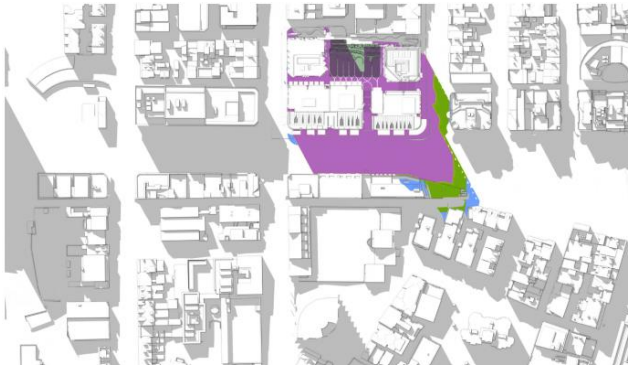
Picture 10: June 21 11:30am



Picture 11: June 21 12pm



Picture 12: June 21 12:30pm



Picture 13: June 21 1:00pm



Picture 14: June 21 1:30pm



Picture 15: June 21 2:00pm



Picture 16: June 21 2:30pm



Picture 17: June 21 3:00pm

- Approved Concept DA Envelope
- SSDA Proposal Within Infill Affordable Housing Limit (IAH)
- SSDA Proposal Outside Infill Affordable Housing Limit (IAH)

As demonstrated above, the proposed development introduces some shadow impacts to the surrounding residential dwellings. Some of these shadows fall within the infill affordable housing height limit (shown in green) and others fall outside of this height limit (shown in blue). However, several design iterations were explored to retain solar access to neighbouring buildings. This has been possible as a result of the sloping roof design which presents to the William Street frontage.

The solar analysis presented above shows that there are some introduced impacts to properties south of William Street between the hours of 9am – 2:30pm. Whilst there is shadow cast to portions of the residential area, due to the slender nature of the proposed built form, it ensures that the shadow moves quickly across the properties in 30-minute windows. Therefore, the introduced impact will only affect the site for a small period across the entire day.

Importantly, some key apartments will be affected by overshadowing due to the increased uplift on the site. These addresses and their impact are noted below:

- **177 – 185 William Street:** Will experience early morning shadow between 9:00am – 10:30am. The shadow cast moves quickly across the property during the 1.5-hour period. 16 of 22 of apartments (73%) will continue to receive 2 or more hours of sunlight. This is the same as its current situation and no changes to 177-185 William Street's solar gain will occur because of the proposed development.
- **184 Forbes Street (The Horizon):** Similar to the above, the Horizon site will experience additional shadowing impact during the morning period from 9:00am – 11:00am. A portion of the impact on this site falls over the pool and tennis court. There are also shadow impacts to the residential dwellings to the northern periphery of this site. 228 of 260 of apartments (88%) will continue to receive 2 or more hours of sunlight as a result of the uplift. At current, 234 of 260 of apartments (90%) receiving 2 or more hours of sunlight. This is a slight reduction in overall solar access to the building, however only 6 apartments of the 260 will be affected by the uplift.
- **6-8 Farrell Avenue:** The north facing apartments will be impacted by overshadowing between 12:30 – 2:00pm. Whilst this is the case, 13 of 26 of apartments (50%) will continue to receive 2 or more hours of sunlight. This is the same as its current situation. No changes to 6-8 Farrell Avenue's solar gain.

Overshadowing in the afternoon is present to the road reserve southeast of the site however this is not considered to be of great impact.

The key additional impact associated with the uplift development occurs in the morning periods. For the abovementioned sites, where apartments are affected by overshadowing in the morning, afternoon solar access is available.

The shadow casts for the most part remain within the bounds of the approved concept envelope. Notwithstanding, the building has been articulated and orientated to minimise shadow impacts as far as practicable and to create faster moving shadows. This is a key consideration as to why the proposed massing has been selected. Nevertheless, taller buildings are a natural consequence of the densification and urban transformation of inner-city locations.

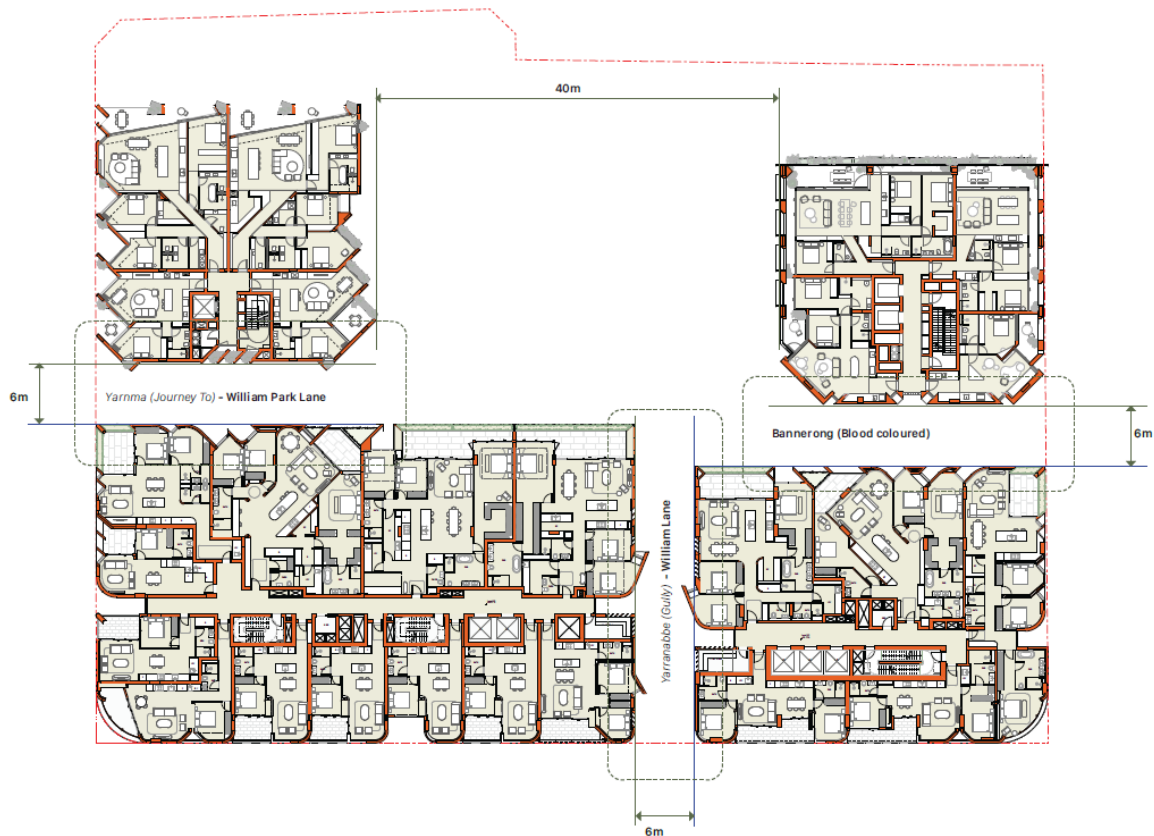
The overshadowing as a result of the proposed development ensures that the surrounding residential buildings either retain solar access for at least 2 hours mid-winter or where those buildings don't currently achieve 2 hours solar access, this is not reduced by more than 20%. The proposed overshadowing is therefore compliant with the objectives of the ADG.

6.1.3.5. Building Separation and Privacy

The site adopts a distinctive design approach that introduces through-site links and pedestrian laneways between the proposed buildings, enhancing permeability and activating the central public open space. These laneways, at 6 metres wide, are consistent with the fine-grain character of Woolloomooloo.

While this approach results in building separations that fall below the ADG guidelines of 9 to 24 metres, strict compliance would generate an outcome inconsistent with the established local urban context. Instead, the design intentionally delivers intimate urban laneways at William Park Lane, Bannerong Lane and William Lane, which open into a generous, landscaped public domain. These locations do not represent primary frontages but rather secondary and pedestrian-focused connections within the site.

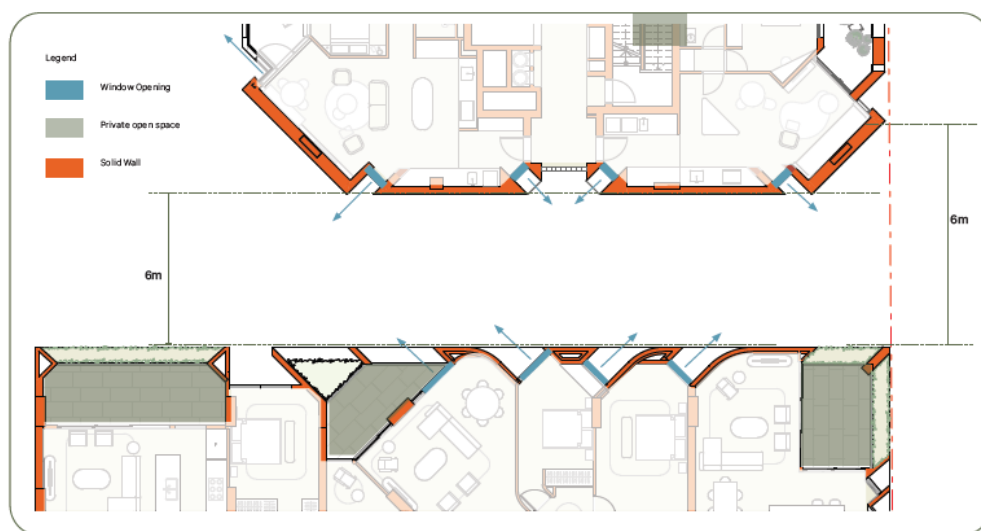
Figure 36: Building Separation



Source: Urban Design Report

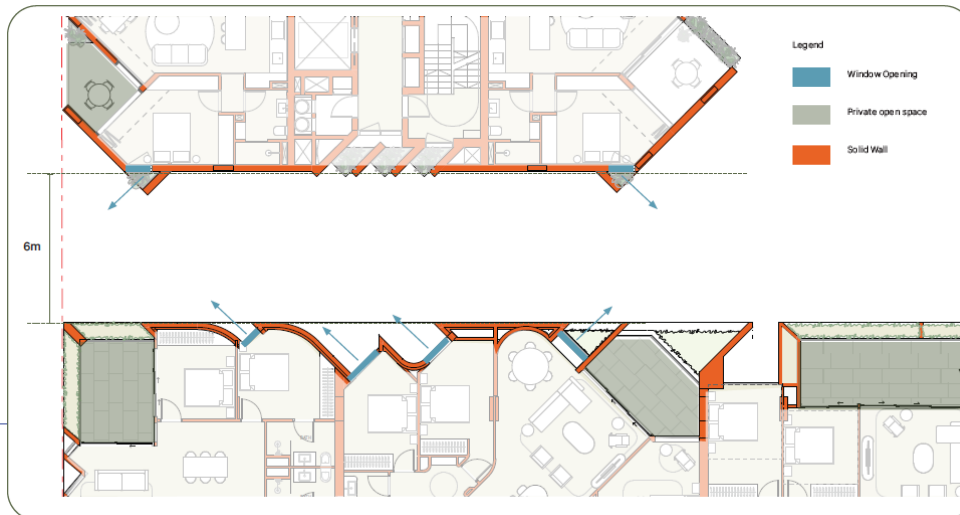
To mitigate potential privacy impacts, both internal and external, the buildings addressing these laneways have been carefully designed with strategic window placement, solid walls and private open space located to avoid direct lines of sight into neighbouring dwellings. These design strategies ensure that external privacy is preserved and that there is no direct overlooking between opposing façades. This approach is consistent with the Design Guidance of the ADG, which allows for alternative solutions where strict numeric compliance is not achievable, provided that visual and acoustic separation objectives are met. The below figures demonstrate each of the treatments to these spaces.

Figure 37: Bunnerong Treatment (Blood coloured)



Source: Urban Design Report

Figure 38: Yarnma (Journey To) - William Park Lane



Source: Urban Design Report

Figure 39: Yarranabbe (Gully) - William Lane



Source: Urban Design Report

The above images illustrate the specific design responses at each laneway interface, demonstrating how windows and balconies have been offset to reduce inter-visibility and maintain a high standard of amenity. The proposed building separations also remain consistent with the competition-endorsed building footprints and envelope placements, which were required to be retained as part of the design development process.

6.1.4. Public Domain Improvements

The Public Space Plan in the Landscape Design Report comprises significant improvements to the private domain both within the site and the public domain at the site's frontages.

The ground plane design features a variety of activated spaces, each with a unique character, creating a strong sense of place and connection to the city. Developed in collaboration with First Nations consultant Bangawarra, the design reflects a deep understanding of the site and thorough analysis.

The design aims to provide a modern and abstract expression of the country, offering diverse open spaces relevant to city life. Key principles include:

- Freshwater Movements: Reflecting the interaction between freshwater and saltwater.
- Gathering in the Landscape: Emphasising biodiversity and living in harmony with nature.
- Landform and Escarpment: Integrating built forms with the natural escarpment, creating diverse spaces and pathways.

The project addresses the lack of community-focused open space in Woolloomooloo, offering extensive green spaces for residents, workers, and neighbours. This includes a park comparable in size to Chippendale Green, providing essential areas for outdoor living, gathering, retail, and dining.

The design celebrates the convergence of freshwater and saltwater landscapes, creating an inclusive and culturally significant character. The landscape layers create a rich ecological diversity and offer various settings for residents, locals, and visitors.

Bangawarra's Connecting with Country Framework informs the thematic concept, exploring natural characteristics such as:

- Snapper: Reflecting the origin of the name Woolloomooloo.
- Shells and Hooks: Symbolising traditional fishing practices.
- Escarpment: Highlighting the steep escarpments along Sydney's Harbour.

Other themes include the Gymea Lily, Flame Tree, fishing line fibres, Dilly Bags, the Emu Constellation, and Glow Worm caves. These themes are integrated into the architecture, landscape, and artwork, creating a cohesive and meaningful design.

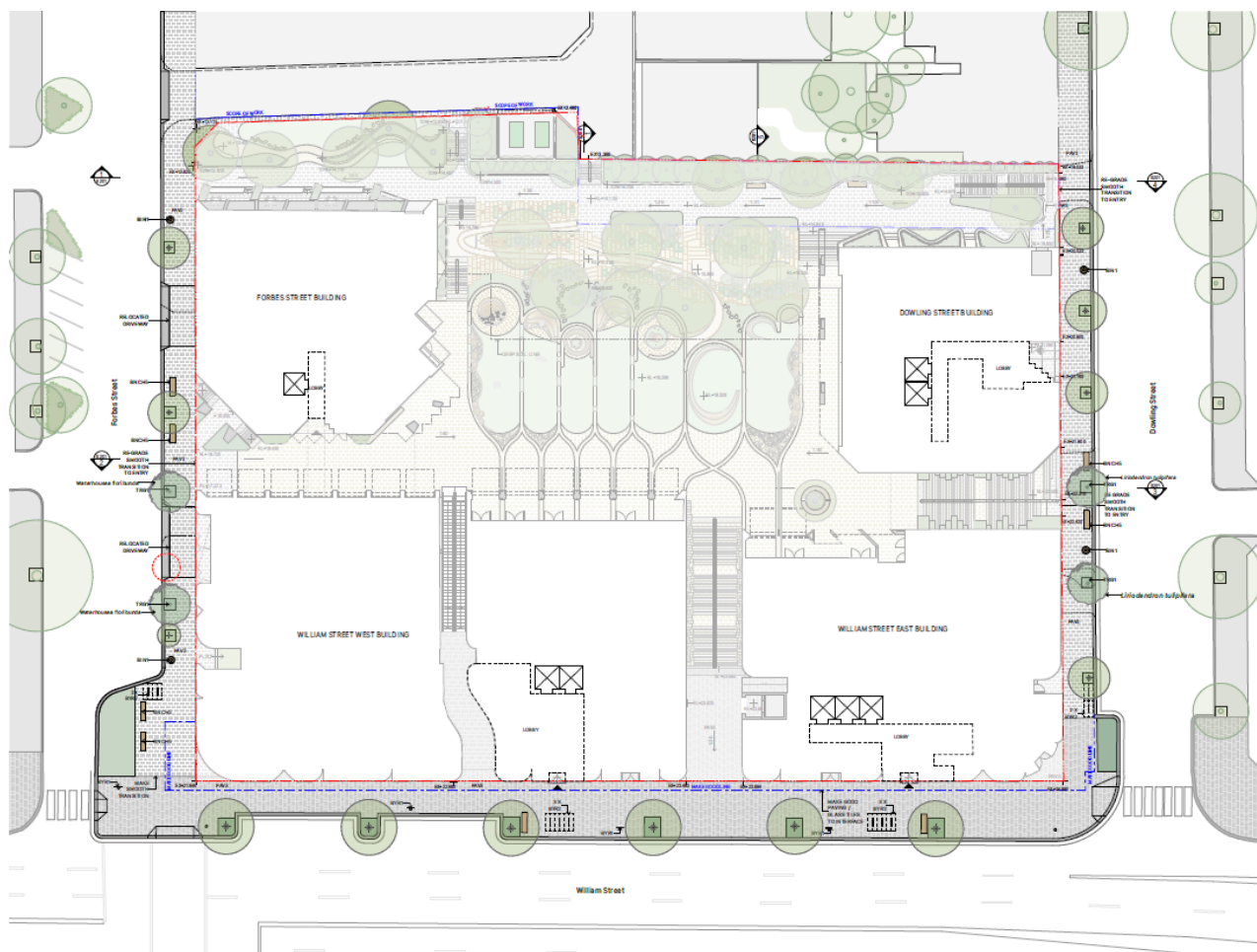
In addition, CPTED has been considered in the development of the proposed public domain scheme, including landscape design.

As aforementioned, the ground plane provides a highly accessible pedestrian environment with multiple through-site links and laneways. These connections improve site permeability, enabling direct movement from the east near Kings Cross Station through to Woolloomooloo Village to the north and the Sydney CBD to the west.

The ground plane includes several retail spaces which comprise a total of 1,782sqm over three storeys. This includes:

- Plaza - Forbes Street,
- Retail Laneway - Dowling Street and,
- Upper Ground -William Street.

Figure 40: Public Space Plan



Source: FJC Studio

6.1.4.1. Trees and Landscaping

The Arboricultural Impact Assessment (AIA) prepared by Dr Treegood at **Appendix GG** assesses the potential impacts on trees on the site as a result of the proposed development and provides recommendations to mitigate the impacts on the trees proposed for retention.

Landscape Plans (**Appendix EE**) and the Landscape Design Report (**Appendix FF**) prepared by FJC studio demonstrate the proposed landscape design and the concepts developed through collaboration with First Nations Consultant Bangawarra.

Existing Environment

There is little existing vegetation within the boundary of the site, with the majority of the site built upon or covered by concrete. An assessment of the existing trees on the site was undertaken by a qualified arborist. They found that 15 street trees are located to the site frontages and are applicable for assessment. These trees are largely located on the site's street frontages, considering the site is already built upon.

Tree Impacts

The arborist undertook a ground level visual tree assessment on the site to identify, assess and record all trees on the site and immediately adjacent to it. The following system was used to assess the retention values of these trees.

Retention Value Ratings:

- **High** – These trees are considered worthy of preservation and careful consideration should be given to their retention as a priority. Tree Protection Zones and the extent of canopy should be considered.

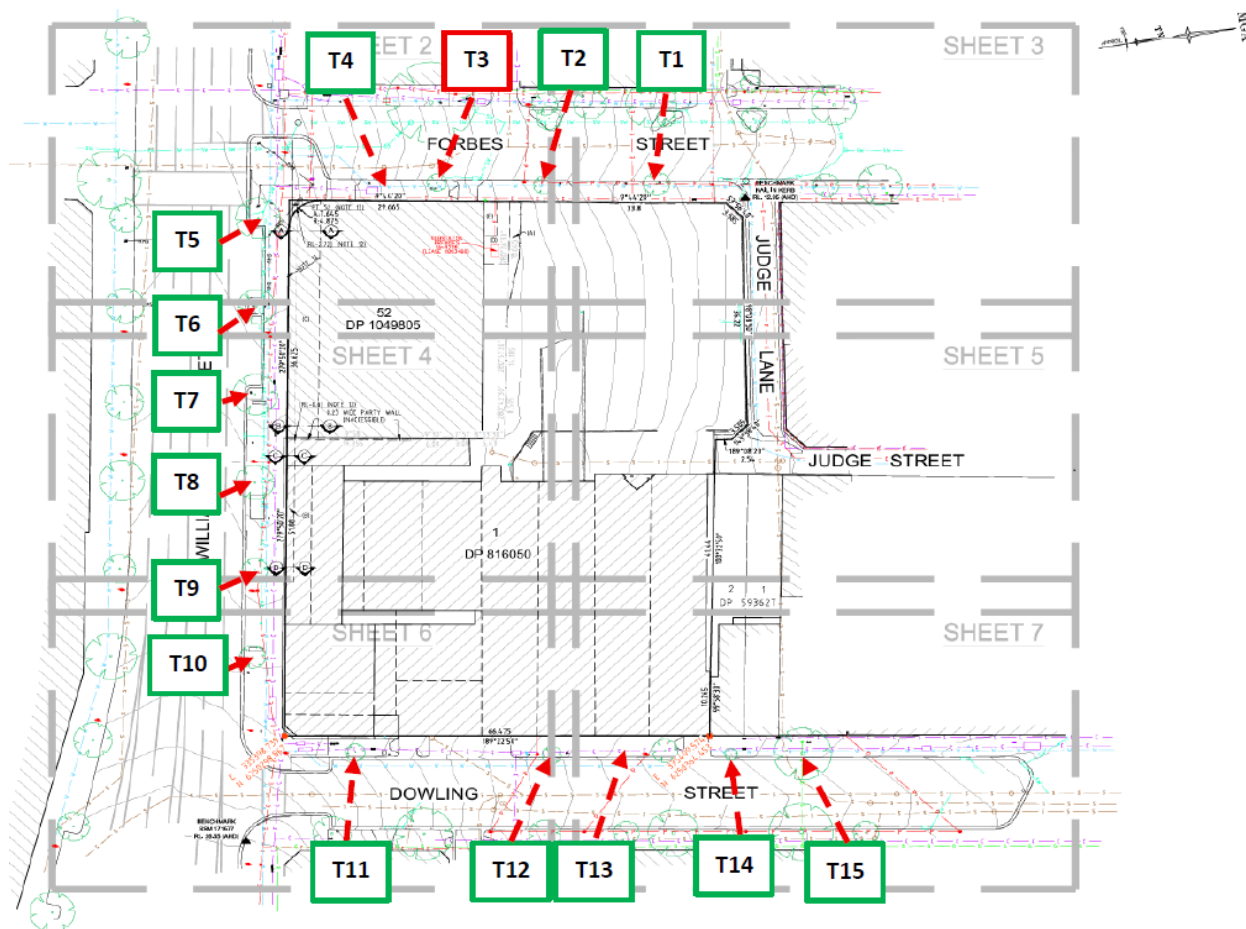
- **Moderate** – These trees should be retained as part of any proposed development if possible. If these trees must be removed, replacement planting should be considered in accordance with Council's Tree Replenishment Policy to compensate for loss of amenity.
- **Low** – These trees are not considered to be worthy of any special preservation measures due to current health, condition, or suitability. They do not have any special ecological, heritage or amenity value and should not be considered as a constraint to the future development of the site.
- **Very low** – These trees are considered potentially hazardous or very poor specimens or may be environmental or noxious weeds. The removal of these trees is therefore recommended regardless of the implications of any proposed development.

A total of 15 trees were assessed, as outlined in **Table 21** below and highlighted in **Figure 41**.

Table 21: Assessment of Existing Trees

Tree #	Species	Location	Retention Value	Proposed Development
1	<i>Platanus x Hybrida</i> London Plane Tree	Forbes Street	Low	Retained
2	<i>Syzygium smithii</i> Lilly pilly	Forbes Street	Moderate	Retained
3	<i>Platanus x Hybrida</i> London Plane Tree	Forbes Street	Moderate	Removed with replacement planting proposed.
4	<i>Syzygium smithii</i> Lilly pilly	Forbes Street	Moderate	Retained
5	<i>Platanus x Hybrida</i> London Plane Tree	William Street	Moderate	Retained
6	<i>Platanus x Hybrida</i> London Plane Tree	William Street	Moderate	Retained
7	<i>Platanus x Hybrida</i> London Plane Tree	William Street	Moderate	Retained
8	<i>Platanus x Hybrida</i> London Plane Tree	William Street	Moderate	Retained
9	<i>Platanus x Hybrida</i> London Plane Tree	William Street	Moderate	Retained
10	<i>Platanus x Hybrida</i> London Plane Tree	William Street	Moderate	Retained
11	<i>Liriodendron tulipifera</i> Tulip tree	Dowling Street	Moderate	Retained
12	<i>Liriodendron tulipifera</i> Tulip tree	Dowling Street	Moderate	Retained
13	<i>Liriodendron tulipifera</i> Tulip tree	Dowling Street	Moderate	Retained
14	<i>Liriodendron tulipifera</i> Tulip tree	Dowling Street	Moderate	Retained
15	<i>Liriodendron tulipifera</i> Tulip tree	Dowling Street	Moderate	Retained

Figure 41: Existing Tree Locations



Source: Dr Treegood

The arborist report recommends the removal of one (1), known as Tree 3 or T3 in the figure above. The tree is proposed for removal as it interferes with the proposed loading dock driveway. It has a moderate retention value, and a replacement tree will be planted on the northern side of the proposed driveway. The remaining 14 existing trees will be retained on and surrounding the site are to be retained.

6.1.4.2. Landscape Plan

The proposed landscape design is detailed in the accompanying Landscape Plans and Landscape Design Report prepared by FJC studio. This design aims to create a range of activated spaces in collaboration with Bangawarra that are unique, inclusive and functional. The landscape plan includes design of the ground plane public open space as well as the communal open space on level 9 of the William Street West building.

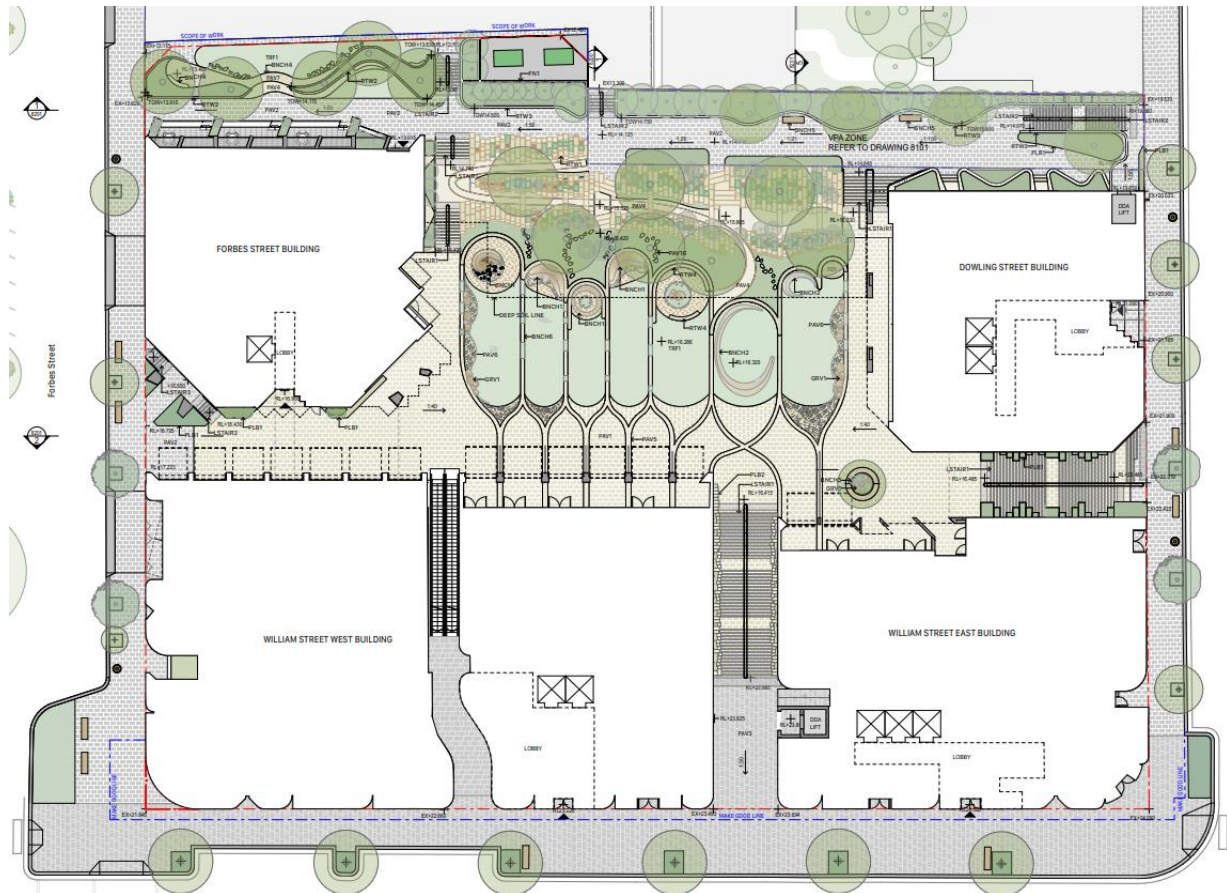
The landscape strategy is guided by the following:

- **Landform and escarpment** – Emphasising Sydney's unique landform and escarpment natural water flows.
- **Freshwater movements** – Reflecting the intersection of freshwater and saltwater.
- **Vegetation characteristics of the site** – Highlighting biodiversity and a place of healing – living with and part of nature.

The design of the escarpment and ground plane celebrates the sandstone country shaped by water flow, which is significant for First Nations people. The podium theme, running from William Street to the northern laneways, abstracts the tracks of fresh water through sedimentary stone. The planting strategy focuses on species that support habitat creation and biodiversity, highlighting the endangered Eastern Suburbs Banksia scrub, Sandstone Heaths, Woodlands, and forests. The Gynea lily, a symbol for First Nations people, is prominently featured. The project aims to create extensive open spaces for residents, workers, and neighbours, fostering a strong connection to the place and community. The design includes diverse spaces

for outdoor living, gathering, retail, and dining, celebrating the convergence of freshwater and saltwater landscapes. The landscape's layers offer rich ecological diversity and varied settings for all.

Figure 42: Landscape General Arrangement



Source: FJC Studio

The proposed landscape strategy meets the relevant compliance requirements as detailed in the below table.

Table 22: Landscape Compliance Requirements

Item	Calculation
Deep Soil	826sqm (176 above required 650sqm)
Canopy Cover	975sqm or 15.3% excluding rooftops trees
Landscaped Area	2,702sqm or 43% overall landscaped area (includes rooftops and deep soil areas)

The landscape strategy and design uphold the following sustainability initiatives:

1. Design falls in paving levels to facilitate surface water recharge to mass planting beds and thereby reduce potable water usage.
2. Appropriate provision of planting to improve air quality and reduce the urban heat island effect
3. Selection of hardy, low water use, indigenous plant species suited to the urban environment
4. The selection of a range of plant species to support biodiversity
5. The possible use of recycled sandstone materials
6. Provision of shaded micro-climates for recreational amenity.

7. Sustainability is at the core of the landscape design, with a primary focus on water management. Sustainable ecological principles guide the layout, material selection, and environmental response. Key initiatives include rainwater harvesting and reuse, careful plant selection, and site microclimatic analysis.
8. Stormwater runoff will be collected and treated using local bio-retention systems within podium planting zones. Appropriate species and best practices will be employed to design these stormwater treatment areas. Treated runoff will be conveyed from rain gardens, and seating elements and raised platforms will be used to ensure public safety while managing stormwater. Additionally, stormwater will be harvested and retained on-site for reuse in planter bed irrigation systems.
9. The integration of green roofs and planted trellises will further enhance water-sensitive urban design, aiding in stormwater pollutant filtration, improving building thermal performance, and attenuating stormwater flows. This holistic approach ensures a sustainable and resilient development.

Mitigation Measures

The arborist report outlines a number of protection methodologies to mitigate any impacts to existing trees during the proposed demolition and construction. These include the following measures:

- Tree Protection Fencing
- Mulching
- Trunk Protection
- Monitor the excavation work within a five plus metre radius of the tree. Excavation in this zone is to be done using hand tools, not an excavator.
- An arborist must cut any roots to be removed with a clean sharp handsaw.
- Wrap any roots found in damp cloth.
- Any area within five metres of the tree trunk (limited) should not be used to storage or mixing of building materials as this could change the microorganisms in the soil.
- Any footing in the zone of the roots is to be built with a pier and beam construction with the aim to give 100mm clearance of the roots.
- Any paving installed must allow air and water penetration to the root zone. The pavers must have sand placed between them and not cement as cement would prevent air flow to the root location.
- If any roots are found in this zone, the pavers are to be raised by the placement of washed sand over the roots. This RL should be determined at an early stage of the construction so that the pavers do not go above the damp course of the house.
- Ground protection methods for tree roots in Tree Protection Zone.
- Excavation with Vac truck within Tree Protection Zone when working with services underneath.

6.1.5. Public Art

The public art strategy for the proposed development will align with the Connecting Country cultural values, ensuring compliance with the Government Architects NSW's Connecting with Country Assessment. This strategy aims to reflect Aboriginal cultural heritage, support cultural identity, involve the community in decision-making, provide training, and create employment opportunities.

Artworks will be strategically placed in areas of movement and transition, using light and shadow to highlight access and relate to Indigenous visual wayfinding and Sky Country. The art will capture themes of flow and movement, enhancing the site's identity.

Key themes include:

- Wallume (snapper) for children's nature play in the western pocket park.
- Currujin (flame tree) and Gynea Lily, connected with West-East Songlines.
- Gibba (stone) representing Sydney Harbour escarpments.

- Emu Constellation, interpreted in a work suspended over the stairs.

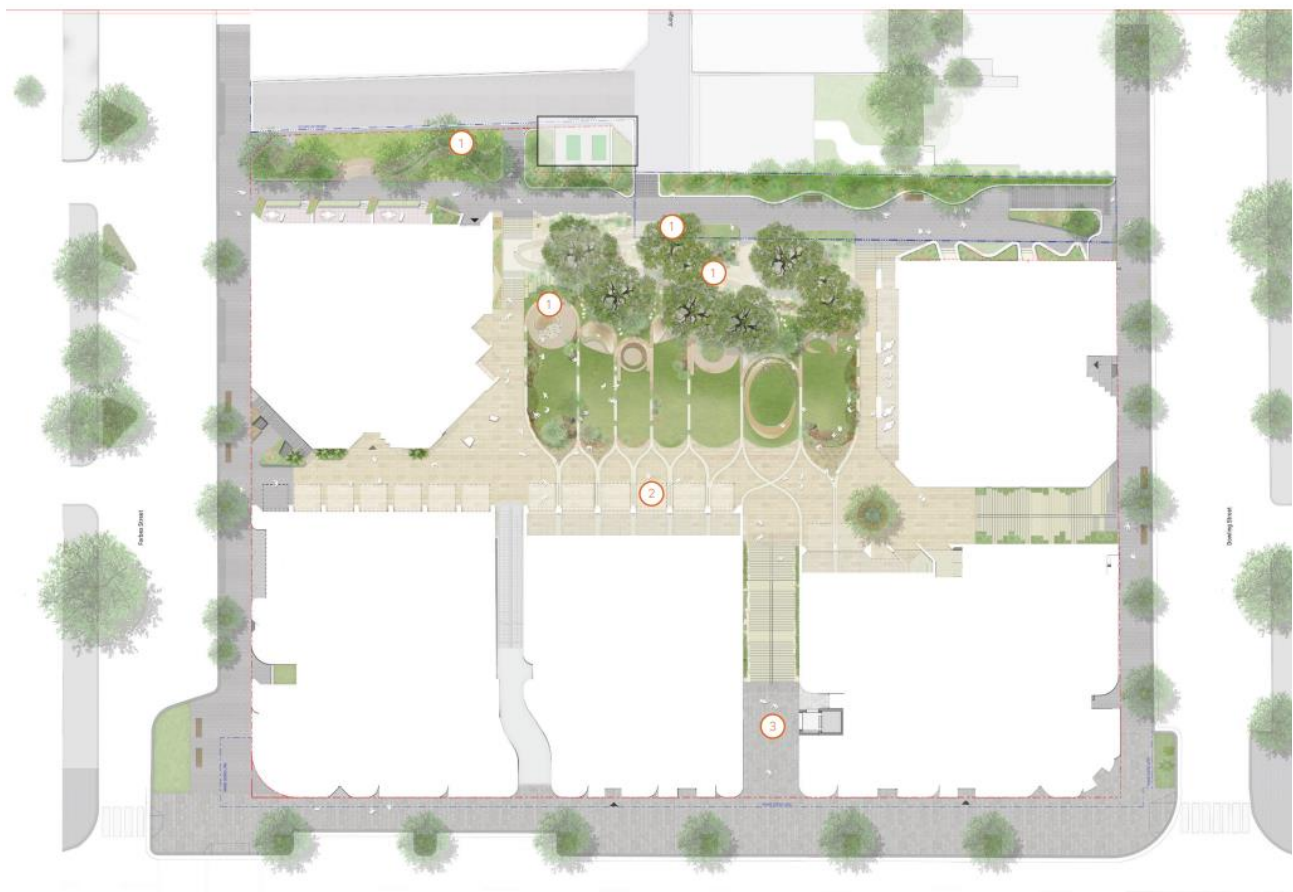
These themes will be embedded in the architecture and landscape, creating a cohesive and culturally significant environment. The strategy will involve local community groups, allowing for unique cultural expressions to be shared and discovered throughout the site.

Figure 43 below identifies the locations of the proposed public art, which are described as follows:

1. The public art installation on the northern escarpment features small discovery objects celebrating Sydney Harbour's flora and fauna, aiming to reveal culture, foster a connection to nature, provide educational experiences, engage visitors, tell local First Nations stories, and support emerging artists, all while creating a unique and memorable space.
2. The public art installation on retail awnings facing primary open space and laneways features 'light touch' printed works that provide pattern and identity to the precinct, aiming for community engagement, cost-effective high visibility, opportunities for emerging artists, and showcasing multiple artists cohesively.
3. The public art installation, suspended above the through site link stair, features integrated lighting for night-time visibility and aims to celebrate the gully-like form of the stair and landscape, serving as a large gateway work that reveals culture, supports a biophilic connection to nature, and potentially elaborates on Connecting with Country themes.

The Public Art Strategy at **Appendix AA** includes illustrations and examples from other developments to conceptualise what the public art will look like.

Figure 43: Public Art Locations



Source: FJC Studio

6.1.6. CPTED

Urbis has prepared a CPTED report which seeks to reduce opportunities for crime and the fear of crime by recommending design and place management principles. Please refer to **Appendix I** for complete details.

The assessment has been informed by a review of relevant local and State policies, as well as demographic and crime data and has been prepared in accordance with Crime Prevention and the Assessment of Development Applications Guidelines.

The proposal will significantly activate the local area, providing an engaging streetscape that benefits both the public domain and the site itself. Parks and laneways will connect the community, fostering bonds among residents and visitors through foot traffic and passive surveillance. Communal residential spaces will further facilitate connections among residents. However, potential conflicts of usage require high-level site management, strong access control, and clear signage to maintain safety and community cohesion. Robust design and urban furniture, secure off-street parking, and a comprehensive CCTV strategy are essential to mitigate opportunistic crimes. The needs of vulnerable populations and the site's role as a transit area between Sydney CBD and Kings Cross, particularly at night, should be addressed through a proactive Plan of Management, lighting strategy, and ongoing consultation with stakeholders. By nurturing community bonds and integrating support services, the development can enhance safety and community cohesion.

The assessment found that, subject to the recommendations made in the report, the proposal aligns with the CoS's *A City for All Community Safety Action Plan (2019)* and CoS's *Development Control Plan 2012 – Section 3.13 Social and Environmental Responsibilities*.

Mitigation Measures

- Install wayfinding measures (signage, icons, directional markers, colour coding) in carpark areas to guide traffic flow and direct residents and visitors to dedicated entries, lifts, and communal areas.
- Ensure clear and legible wayfinding to distinguish between various site uses, enhancing navigation and minimising unauthorised access.
- Implement adequate lighting throughout the carpark, entry/exit points, and residential corridors to support natural surveillance and accommodate varying arrival and departure times.
- Use balanced lighting between internal and external spaces to avoid mirroring and maintain sight lines, and incorporate lighting in urban design features to enhance safety and character.
- Install CCTV in hidden and inactivated carpark areas, entry/exit points, and retail spaces to provide 24/7 surveillance, complementing passive surveillance.
- Use clear signage to inform about CCTV presence and ensure it does not make people feel unsafe.
- Maintain the site safe, clean, and tidy through regular monitoring and maintenance, including landscaping to prevent overgrowth and blind spots.
- Ensure retail operators contribute to the site Plan of Management, detailing security and maintenance procedures, and organise security personnel to focus on key areas at night.
- Provide adequate bins in open spaces, use anti-graffiti materials, and offer welcome packs to new residents to foster community and familiarity with the site.
- Implement access control measures for back-of-house facilities, entrances, lifts, and doors to prevent unauthorised access.
- Enhance pedestrian safety near utility rooms with clear signage, lighting, and barriers, and improve safety in end-of-travel facilities with surveillance and secured access control.
- Paint basement ceilings/walls white to reflect light and increase appeal, and restrict unauthorised access to retail spaces during non-operational hours.
- Secure mail areas to prevent theft, consider CCTV for surveillance, and install locked boxes for emergency services with clear signage and monitoring.
- Expand public art in communal areas to enhance appeal and community connection, and develop structured activities to foster social connections.

- Allow access to rooftop areas for residents of other towers to encourage community bonding, and ensure landscaping does not compromise natural surveillance or create concealment spaces.
- Provide comfortable seating for seniors and people with disabilities, use transparent materials for lift walls to encourage passive surveillance, and keep pedestrian routes clear of obstructions and concealment areas.
- Encourage community activities in public spaces to increase legitimate use and surveillance, extend public art installations to create a welcoming environment, and use robust materials and graffiti-resistant coatings to reduce vandalism risk.

A comprehensive list of all recommendations/mitigation measures can be found in the Mitigation Measures Table at **Appendix D**, or the CPTED Report at (**Appendix I**).

6.1.7. Pedestrian Wind

A Pedestrian Wind Environment Assessment has been prepared by Wind Engineering Consultants (**Appendix BB**) to evaluate the wind conditions associated with the SSDA.

In support of the proposal, wind tunnel testing of a 1:300 scale model of the development and its surrounding buildings within an approximately 430 m radius of the site was undertaken. Wind measurements were recorded at 24 locations to evaluate pedestrian wind comfort and safety around the site, particularly to areas experiencing relatively severe conditions frequently found near building entrances and passageways, at outdoor recreation areas and terraces.

The wind assessment applies Lawson's (1990) pedestrian wind criteria, which separates conditions into comfort (for activities like sitting or walking) and distress (safety concerns due to high wind speeds), and aligns with the CoS's guidelines, which assess safety based on maximum gusts occurring between 6 am and 10 pm to reflect typical pedestrian activity hours.

The Statement applies the following wind speed criteria for pedestrian comfort:

- Uncomfortable Criterion (>8 m/s with a 5% probability of exceedance) for strong winds unacceptable for all pedestrian activities;
- Walking Criterion (6–8 m/s with a 5% probability of exceedance) for general circulation and pedestrian thoroughfares;
- Standing Criterion (4–6 m/s with a 5% probability of exceedance) for stationary activities generally less than an hour;
- Sitting Criterion (2–4 m/s with a 5% probability of exceedance) for long duration seating areas and other amenities;
- Dining Criterion (<2 m/s) suitable for outdoor dining.

The assessment considers how wind interacts with the proposed building form and surrounding context, identifying specific locations where safety thresholds are exceeded, and evaluating the impact of design on overall pedestrian comfort. Key findings are as follows:

- Majority of pedestrian-accessible areas are suitable for Standing or Walking under Lawson comfort criteria, consistent with surrounding conditions.
- Wind conditions are appropriate for public domain uses, with calmer conditions in the northern central plaza.
- The proposed development has minimal overall impact on pedestrian wind conditions compared with existing.
- Under existing conditions, three locations at the south-west corner exceeded Lawson safety criteria (rated for able-bodied pedestrians).
- With the proposed development, safety exceedances reduced to two (Initial configuration) and one (Affordable Housing configuration).
- All other locations passed the Lawson safety criterion.

6.1.8. Traffic, Access and Parking

A Transport Impact Assessment (TIA), Preliminary Construction Traffic Management Plan (CTMP) and Green Travel Plan (GTP) have been prepared by The Transport Planning Partnership (TPPP) (Appendix T) to support the proposed development and assess the anticipated transport implications of the proposed development during both construction and operational stages.

6.1.8.1. Existing Environment

The surrounding road network includes William Street, a six-lane, two-way arterial state road running east-west, Forbes Street and Dowling Street, both local roads running north-south, and Judge Lane, a local road to the north which provides rear property access to Judge Street. At current, vehicle access is provided via Dowling Street, Forbes Street and Judge Lane. Beyond the sites immediate boundaries are state roads known as the M1 motorway (including Sydney Harbour Tunnel) and the Cross City Tunnel.

The area benefits from excellent access to public transport, being approximately 300m east of Kings Cross Railway Station (a five-minute walk), which is serviced by the T4 Eastern Suburbs and Illawarra Line and the South Coast Line. Additional stations such as Town Hall, Museum, St James, and Martin Place are within a 15–20-minute walking distance.

A number of bus stops are located within a 400m radius of the site, providing convenient access for residents and visitors. Of note, bus services operating along William Street and Darlinghurst Road, include:

- Routes 324 and 325 (Watsons Bay to Walsh Bay)
- Route 311 (Millers Point to Central Station)

In addition to public transport options, pedestrian and active transport infrastructure is well-established throughout the area:

- William Street includes 4m wide pedestrian paths on both sides.
- Forbes Street and Dowling Street feature 3.6m wide footpaths.
- Judge Street and Judge Lane operate as informal shared zones without formal footpaths.

The site is well-connected to Sydney's cycling network, with:

- On-road cycling facilities along William Street, Cathedral Street, and Forbes Street
- Separated off-road cycleways along Bourke Street
- Proposed cycleway upgrades to connect to Edgecliff, Victoria Street, and Darlinghurst Road

The site is highly accessible via private vehicle and sustainable transport options such as walking, cycling and public transportation.

6.1.8.2. Potential Impacts

Access

The proposed development consolidates the existing six vehicle crossovers across the site's frontages into two driveway crossovers on Forbes Street. The access points are:

- Basement car park access via a one-way driveway located at the site's north-western frontage to Forbes Street.
- Loading dock access via a separate driveway on the south-western frontage to Forbes Street, physically separated from the car park entry.

This arrangement responds appropriately to the site's sloping topography. Separating the loading dock and car park entries enhances pedestrian safety, improves visual and pedestrian amenity, and allows for more efficient on-site vehicle circulation. The loading dock is expected to generate infrequent movements, with opportunities to distribute these more evenly across the day, thereby avoiding additional traffic generation.

Consolidating vehicle access to Forbes Street minimises potential conflicts with pedestrians and general traffic along the busier William Street frontage. As part of the proposed demolition works, all existing accessways will be removed. This reduction in access points is considered appropriate for the consolidated use of the site and is expected to deliver improved traffic operations and safety benefits for active transport users.

Parking

Residential car parking is provided in accordance with the provisions outlined in the Housing SEPP which adopts the minimum parking rates. Retail parking rates have been assessed against Part 7, Division 1 of the Sydney LEP. These rates are broken down in **Table 23** below.

Table 23: Parking Rates

Land Use	Yield	Parking Rate	Source	Parking Requirement	Parking Provision
Affordable Housing					
1 Bedroom	42 Units	0.4 spaces per unit	Housing SEPP	17	26
2 Bedroom	18 Units	0.5 spaces per unit		9	
Sub-total				26	
Non-affordable Housing					
1 Bedroom	12 Units	0.5 spaces per unit	Housing SEPP	6	263
2 Bedroom	51 Units	1 space per unit		53	
3+ Bedroom	102 Units	1.5 spaces per unit		153	
Sub-total				212	
Residential Total				238	289
Retail and Residential Visitor					
Retail	1,782sqm	1 space per 50sqm	Sydney LEP (maximum rate)	34	32
Residential Visitor	225 units	for each dwelling up to 30 dwellings —0.167 spaces, and for each dwelling more than 30 and up to 70 dwellings — 0.1 spaces, and for each dwelling more than 70 dwellings — 0.05 spaces		16	10
Retail & Residential Visitor Total (Maximum Rate)				50	42

The table above demonstrates that the number of car spaces provided complies with the parking rates specified by the Housing SEPP for the affordable and market housing units. Moreover, the parking provision provided for the retail and residential visitor component provides for an outcome which does not exceed the maximum rates prescribed in the LEP. Therefore, the proposed development provides a compliant outcome for onsite parking.

Motorcycle Parking

The SDCP requires motorcycle parking at a rate of one space per 12 car parking spaces, equating to 24 motorcycle spaces based on 293 car spaces. The proposal includes 25 motorcycle spaces, which complies with the SDCP requirement.

Bicycle Parking & EOT

Based on the SDCP rates, 276 bicycle parking spaces are to be provided. The proposal includes 335 parking spaces. Based on these figures, the proposed development complies with the SDCP bicycle requirements.

In addition to the above, the SDCP requires that bicycle parking for visitors be provided in an accessible on-grade location nearby the main public entrance. 20 retail visitor spaces are provided along the William Street frontage and therefore satisfies this requirement.

End-of-trip facilities including changerooms, showers and lockers are provided in Basement 01. This includes 34 separate lockers and 5 showers. The end-of-trip facilities are only to be provided for the non-residential land use of the development.

Servicing and Loading Arrangements

The service vehicle access point is separated from the general vehicle access point, as described above. To accommodate servicing arrangements, a turntable is situated within the dock to allow for vehicles to enter and egress in forward direction. A loading dock at Plaza level of the FJC Studio building is provided, containing space for a Council waste truck of 10.6m in length, a Small Rigid Vehicle (**SRV**), and a Medium Rigid Vehicle (**MRV**).

The loading dock has a minimum head height clearance of 4.2m which is suitable to accommodate the largest vehicle expected to enter the loading dock, being a Council waste vehicle.

The loading dock is also consistent with the requirements of AS2890.2 as it is separated entirely from passenger vehicle operations. All onsite car park and loading areas have been designed in accordance with the relevant Australian Standards AS2890.1 and AS2890.2.

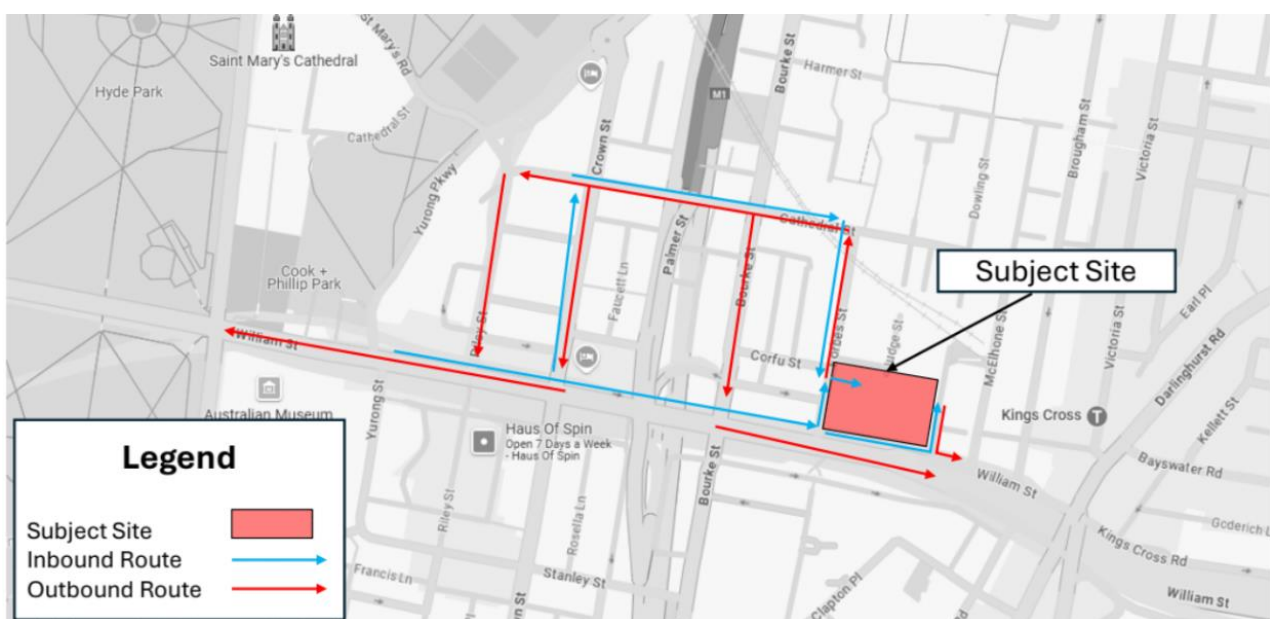
6.1.8.3. Potential Construction Traffic Impacts

A Construction Traffic Management Overview has been prepared by TTPP in conjunction with the TIA.

The extent of the work activities will be wholly contained within the site boundary, except for where on-street works zones are required for unloading and loading activities.

The proposed construction vehicle access routes have been selected to align with the surrounding arterial road network. The no-through nature of Dowling Street as well as the narrow carriageways within the local area will likely require swept path analysis in the detailed Construction Traffic and Pedestrian Management Plan to determine any road and intersection upgrades required to accommodate the largest construction vehicle.

Figure 44: Indicative Construction Vehicle Routes



Source: TTPP

Based on movements generated by similar projects, it is expected that the construction traffic will generate approximately four to six trucks per hour on average and up to 12 trucks per hour during peak activities.

The TIA confirms that the surrounding road network has the ability to accommodate this volume of traffic subject to appropriate management.

Demolition and construction activities will be completed subject to approved construction work hours detailed in the relevant development consent conditions. It is assumed that these will be between 7am to 6pm Monday to Saturday, with no work to be undertaken on Sundays or public holidays.

6.1.8.4. Potential Operational Traffic Impacts

The traffic generation assessment for the proposed development has been undertaken in accordance with the TfNSW Guide to Transport Impact Assessment (2024) and Technical Direction TDT 2013/4a, which provide standard traffic generation rates for residential and retail land uses.

Based on TfNSW guidance for high-density residential dwellings in Sydney, the following traffic generation rates apply:

- AM Peak Hour: 0.19 vehicle trips per dwelling
- PM Peak Hour: 0.15 vehicle trips per dwelling
- Saturday Midday Peak: 0.25 vehicle trips per dwelling

Using these rates, the residential component is expected to generate:

- 43 vehicle trips during the weekday AM peak
- 34 vehicle trips during the weekday PM peak
- 56 vehicle trips during the Saturday midday peak

The proposal includes 1,782sqm of retail floor space. While TfNSW provides standard rates for shopping centres, these have been adjusted downward by two-thirds to reflect the lower parking provisions and the site’s location, which is expected to attract walk-up customers from the local area. Adjusted traffic generation estimates for the retail component are:

- 10 vehicle trips during the weekday AM peak
- 22 vehicle trips during the weekday PM peak
- 28 vehicle trips during the Saturday midday peak

The total estimated traffic generation is detailed in **Table 24** below.

Table 24: Total Development Traffic Generation

Peak Period	Estimated Trips (Vehicle / Hour)
Weekday AM Peak	53
Weekday PM Peak	56
Saturday Midday Peak	84

The proposed development will result in a noticeable reduction in weekday traffic compared to the existing car rental operation, which currently generates up to 350 vehicle trips per day. The new residential and retail uses are expected to produce between 53 and 56 vehicle trips during weekday peak hours, significantly easing pressure on the surrounding road network. However, the development will generate more vehicle movements on weekends, particularly during the Saturday midday peak, when up to 84 trips are anticipated. While this represents an increase over current weekend activity, the overall traffic impact remains lower than the existing use and is considered manageable within the local context.

Green Travel Plan

A GTP has been prepared by TTPP to inform delivery and promotion of transport choices for the tenants and visitors of the proposed development to reduce reliance of car use. The GTP aims to encourage the use of transport modes that have low environmental impacts by implementing measures that influence the travel patterns of residents and employees of the proposed site.

The following transport objectives have been identified:

- **Objective 1:** Facilitate a modal shift towards more sustainable transport modes
- **Objective 2:** Reduce car ownership and promote car share use
- **Objective 3:** Reduce the need to travel off-site

Due to the site's proximity to King's Cross Station, the Sydney CBD, bus stops and cycleways, a modal shift of 10% will be targeted. These targets will have a 5-year timeframe and will be used to measure the GTP's success at the end of the period.

The targets include a 10% decrease in car use for both residents and retail employees and an overall increase in the use of active transportation.

The following measures will be implemented to achieve the set targets:

Walking and Cycling:

- Bicycle parking spaces will be provided within secure bicycle parking areas located in the basement.
- Walking and cycling maps of the site and nearby facilities are provided on site to assist residents and visitors with navigation.
- Adequate wayfinding signage is included on site to ensure that all residents are made aware of existing nearby facilities to promote active transport to/from the site.

Public Transport:

- Public transport maps are provided on newsletters, websites and social media to inform residents and visitors of alternative transport options in the area. This will be included in the Travel Access Guide (TAG) which will form part of the welcome pack for residents.

Car Share Scheme:

- Provision of car spaces for participation in a car share scheme is planned for development and will assist in the reduction of car ownership, allowing residents to access a vehicle when one is required.
- The proposed development involves five (5) car share spaces. An additional two (2) car share spaces already exist on Forbes Street. Confirmation of total car share availability will be provided with the detailed GTP.

Off-site Measures:

- The provision of retail and food and beverage opportunities around the surrounding suburb reduces the need for residents to travel far. Proximity to King's Cross Station and the CBD significantly mitigates the need for residents to travel via motor vehicle on a regular basis. Proximity to multiple medical centres and hospitals is expected to further reduce need for resident's vehicle travel.

Mitigation Measures

TTPP sets forth the following mitigation measures in regard to the onsite traffic, access and parking arrangements:

- a Construction Traffic Management Plan that considers the potential traffic, transport and parking impacts at an overview level that could arise during the construction phase across the precinct and proposed suitable mitigation measures to reduce the impacts
- a Green Travel Plan that embraces the principles of sustainable transport. It also indicates the measures that will be put in place to influence travel patterns to/from the site with a view to encourage more sustainable transport modes from occupation.

6.1.9. Noise and Vibration

Renzo Tonin and Associates has prepared a Noise and Vibration Impact Assessment to evaluate potential impacts and identify mitigation measures based on noise-sensitive receptors and methodology during the construction and operation of the Project. The Noise and Vibration Impact Assessment is attached at **Appendix W.**

6.1.9.1. Existing Environment

The site is surrounded by several sources of noise, including adjacent roadways and rail corridors. The site is located within a mixed-use urban environment characterised by commercial, retail, residential, and recreational land uses. Of note, the proximity of the site to major roadways such as William Street State classified road necessitates a thorough assessment of noise intrusion to ensure compliance with relevant noise criteria and to maintain a high standard of living for future occupants.

To assess the environmental noise levels and noise exposure of the future development, a series of attended and unattended (long-term) noise measurements were undertaken at the site. These measurements were essential to determine the baseline environmental noise levels and to predict the potential noise impact on future residents within the development.

To assess the potential impacts to the surrounding area, the nearest residential sensitive receivers were identified in the NVIA and are shown in **Figure 45** below.

Figure 45: Surrounding Receivers and Monitoring Locations



Source: Renzo Tonin and Associates

6.1.9.2. Potential Impacts

Construction Noise and Vibration Assessment

The acoustic report assesses the noise impact from equipment associated with construction works, which will include demolition, excavation and piling stages, and construction.

The Interim Construction Noise Guideline (**ICNG**) sets out specific noise management levels to ensure that construction activities do not unduly impact the surrounding community. These levels are designed to

provide a balance between allowing necessary construction activities to proceed and protecting the amenity of nearby residents and sensitive land uses. These are outlined in **Table 25** below.

Table 25: Noise Management Levels

Time of Day	Management Level LAeq (15 min)*	How to Apply
Recommended Standard Hours:	Noise affected RBL + 10dB(A)	Apply all feasible and reasonable work practices to meet the noise affected level. Inform potentially impacted residents of the nature of works, expected noise levels, and duration. For highly noise affected levels, consider respite periods and community preferences.
- Monday to Friday from 7am to 6pm - Saturday from 8am to 1pm. - No work is allowed on Sundays or public holidays.	Highly noise affected 75dB(A)	
Outside recommended standard hours	Noise affected RBL + 5dB(A)	

Based on the above, the following table summarises the noise management levels for residential receivers and sensitive land uses relevant to the proposed development. These levels are specific to the site, using the Rating Background Levels (**RBL**) from determined through the noise monitoring process.

Table 26: Noise Affected Noise Management Levels - Standard Construction Hours

Receiver	RBL, LA90 Day (7am - 6pm)	Noise Management Level, LAeq(15min)
William St residential receivers	62	RBL + 10 = 72
Forbes, Dowling and Judge receivers	57	RBL + 10 = 67

From a commercial perspective, the ICNG sets out the noise management levels for sensitive land use developments. For commercial and retail (external) uses, the management level, LAeq (15 min) is 70dB(A). This applies when the land use is being utilised.

A list of equipment associated with the construction works and their typical noise levels are detailed in the acoustic report. The predicted noise levels at all receivers have been assessed against the construction noise criteria within the ICNG. The assessment finds that:

- It is likely that some surrounding residential receivers will be impacted by construction noise and therefore classed as highly affected receivers. Whilst this is the case, it is not anticipated that classification would extend for the whole of the construction period, but rather when work is undertaken near the shared boundary.
- Once the façade is installed, it is anticipated that internal fitout would be below the noise management levels at receivers. The detailed construction noise management plan should consider the construction program and schedule to manage noise impacts to neighbours.

The acoustic report identifies potential vibration impacts from construction activities. These include:

- Occupant Disturbance: Vibration may cause discomfort or annoyance to nearby residents, particularly during high-impact activities like piling or hammering.
- Structural Damage: Excessive vibration can lead to cosmetic or minor damage to buildings, especially older or heritage structures. However, the report notes that vibration levels causing damage are typically much higher than those causing human disturbance.
- Buried Services: Underground infrastructure such as pipes may be sensitive to vibration, depending on their material and proximity to construction works.

Vibration impact is difficult to determine at this stage given there are many variables which impact this. Final vibration levels are dependent on many factors including the actual plant used, its operation and the intervening geology between the activity and the receiver. Therefore, a further detailed construction vibration management plan will be prepared during the detailed design phase. It is likely that this report will involve recommendations for vibration monitoring during excavation and construction of the building structure. It is not anticipated that this would be required during the internal fitout stage.

Appropriate mitigation measures are recommended below.

Operational Noise

Residential

The proposed development is influenced by external noise sources including road traffic from William Street, rail noise from the Eastern Suburbs Rail Line, and patron noise from outdoor dining in the east-west through site link. Target internal noise levels have been established to guide façade and ventilation design. These levels have been determined with the objective to:

- Provide protection from outside noise without simply relying only on acoustic glass.
- Incorporate natural ventilation pathways while providing acoustic protection from external noise.
- ADG Design guidance, Section 4J.

The noise criteria for this assessment has been informed by state and council guidelines, including T&ISEPP, the Department of Planning's guide for developments near busy roads and rail lines, and the SDGP. In addition, Australian Standard AS/NZS 2107:2016 were used to ensure internal spaces meet recommended acoustic levels.

The apartments are designed to perform under two main scenarios to ensure occupant comfort. In the first scenario, natural ventilation through open windows is possible where external noise levels are within acceptable limits. This allows residents to enjoy fresh air while maintaining internal noise within the recommended targets.

In the second scenario, where external noise is more extreme, such as apartments facing William Street or the rail line, windows are kept closed and alternative ventilation systems are proposed. This includes acoustic plenums or mechanical ventilation that allow fresh air to enter the room without allowing excessive external noise inside. These systems are designed to comply with relevant acoustic standards, ensuring internal spaces remain comfortable.

Target internal noise levels are applied in both scenarios. Bedrooms are generally limited to 35–45 dB(A) and living areas to 40–50 dB(A), depending on the ventilation method. This ensures that whether residents are sleeping, relaxing, or entertaining, the internal noise remains within recommended guidelines.

To meet internal noise criteria and natural ventilation requirements, the following measures are proposed:

- Protected balconies on the first four levels for apartments fronting William Street.
- Specific glazing treatments to each residential unit. These specifications differ depending on the building and level and involve a range of sound insulation types and glazing configurations.
- 12.38mm laminated glass (Rw36) glazing is proposed to retail tenancies facing William Street and the corner tenancies to Forbes and Dowling Streets. Whilst the remaining retail on Forbes/Dowling may include a treatment of 6.38mm laminated (Rw 32).
- For retail tenancies facing to the through site links, 6.38mm laminated glass will suffice.
- External walls to have a sound isolation rating (Rw) at least 15dB higher than that of the glazing specified in the above, to maintain the acoustic integrity of the overall facade system.
- The roof construction should have a sound isolation rating (Rw) at least 10dB higher than that of the glazing on its facade.

Further discussion regarding the ventilation strategy is provided in **Section 6.1.3.2**.

Overall, the assessment demonstrates that:

- Majority of apartments can achieve acceptable internal noise levels using natural ventilation through open windows.
- Where external noise is higher, acoustic plenums or mechanical systems provide fresh air while keeping internal noise within target limits.
- Bedrooms and living areas are consistently designed to meet recommended internal noise ranges across all scenarios.
- Design measures prioritise maximising the number of apartments that can use open windows, reducing reliance on mechanical ventilation.
- The approach ensures compliance with all relevant guidelines and Australian standards for residential noise.
- Residents can expect a comfortable internal environment, with noise intrusion minimised from traffic, rail, and laneway sources.

Patron Noise

The proposal includes outdoor dining areas within the East-West through-site link, which will be active during daytime and evening hours. This area has been identified as an area of external noise emission. Noise emissions from this area have been assessed to both on-site receivers and external receivers.

Key findings from the acoustic report include:

7am to 10pm, outdoor dining areas are assumed to be fully occupied. Predicted noise levels are:

- 49dB(A) at the nearest residence on Forbes Street
- 44dB(A) at the nearest residence on Dowling Street

10pm to midnight patron numbers are assumed to reduce by half, resulting in a 3dB reduction in noise levels:

- 46dB(A) at Forbes Street
- 41dB(A) at Dowling Street

Each of the above levels are compliant with the cumulative patron noise goal of background +5dB(A) at external residential receivers.

Mechanical Plant

Mechanical plant associated with the development is expected to include carpark exhaust and supply systems, air conditioning, hot water, and stair pressurisation equipment. These systems are likely to be located in the basement or at roof level. Preliminary review indicates that compliance with the NPfI is readily achievable. Where basement plant is used, noise control can be implemented through duct lining, silencers, or similar treatments. A detailed acoustic review will be undertaken at the Construction Certificate stage once final plant selections are confirmed.

Traffic Movement

Noise levels generated by traffic from the site have been assessed in accordance with the NSW EPA Road Traffic Noise Criteria. The proposal will generate additional vehicle movements, primarily via the carpark entry and loading dock on Forbes Street. These movements have the potential to increase road traffic noise affecting nearby residential receivers.

The assessment applies the NSW EPA Road Traffic Noise Criteria, which allows a maximum increase of 2dB over existing levels where compliance with base criteria is not achievable. This is considered a minor impact and generally imperceptible to most people.

Based on long-term noise monitoring, existing noise levels on Forbes Street already exceed the applicable criteria. The proposed development is expected to generate approximately 17 additional vehicle trips likely to occur around midday on Saturday. This increase is predicted to result in a noise change of less than 2dB at

the nearest residential receivers of Forbes Street (worst affected receivers on the local road), which is considered negligible and compliant with the EPA guideline.

Mitigation Measures

The Noise and Vibration Impact Assessment (**Appendix W**) identifies mitigation measures for the proposed development. These mitigation measures may include but not limited to the following:

General Noise Management Measures

- Use less noisy plant and equipment, where feasible and reasonable.
- Plant and equipment must be properly maintained.
- Strategically position plant on site to reduce the emission of noise to the surrounding neighbourhood and to site personnel where feasible and reasonable.
- Avoid any unnecessary noise when carrying out manual operations and when operating plant.
- Any equipment not in use for extended periods during construction work must be switched off.
- Simultaneous operation of noisy plant within discernible range of a sensitive receiver is to be limited/avoided where possible.
- The offset distance between noisy plant and adjacent sensitive receivers is to be maximised where practicable.
- Plant used intermittently to be throttled down or shut down when not in use where practicable.
- Noise-emitting plant to be directed away from sensitive receivers where possible.
- Staging of construction works so as to erect solid external walls first and utilising them to provide noise shielding to the noise sensitive receivers. However, the structural integrity of the external walls should be investigated prior to implementing this measure and should be prioritised over the noise benefits
- In addition to the noise mitigation measures outlined above, a management procedure will need to be put in place to deal with noise complaints that may arise from construction activities. Each complaint will need to be investigated, and appropriate noise amelioration measures put in place to mitigate future occurrences, where the noise in question is in excess of allowable limits.
- Upgraded façade treatments to protect future residents from road traffic noise from William Street and to a lesser extent Forbes and Dowling Streets, and rail noise from the Eastern Suburbs line to the North (partially screened by adjacent buildings).
- Upgraded façade and dedicated treatments for acoustically attenuated natural ventilation.
- Defining construction noise and vibration management measures to be employed by the ultimate building contractors.

6.1.10. Environmental Heritage

A Heritage Impact Statement (**HIS**) has been prepared by Urbis and is appended to this EIS (**Appendix PP**). The HIS provides an assessment of potential heritage impacts as a result of the proposed development in accordance with The Burra Charter and Heritage NSW guidelines.

The subject site does not contain any heritage listed items, nor is it within the boundaries of any Heritage Conservation Areas (**HCA**). It is important to note however, that the subject site is located adjacent to three HCA of local significance, these include:

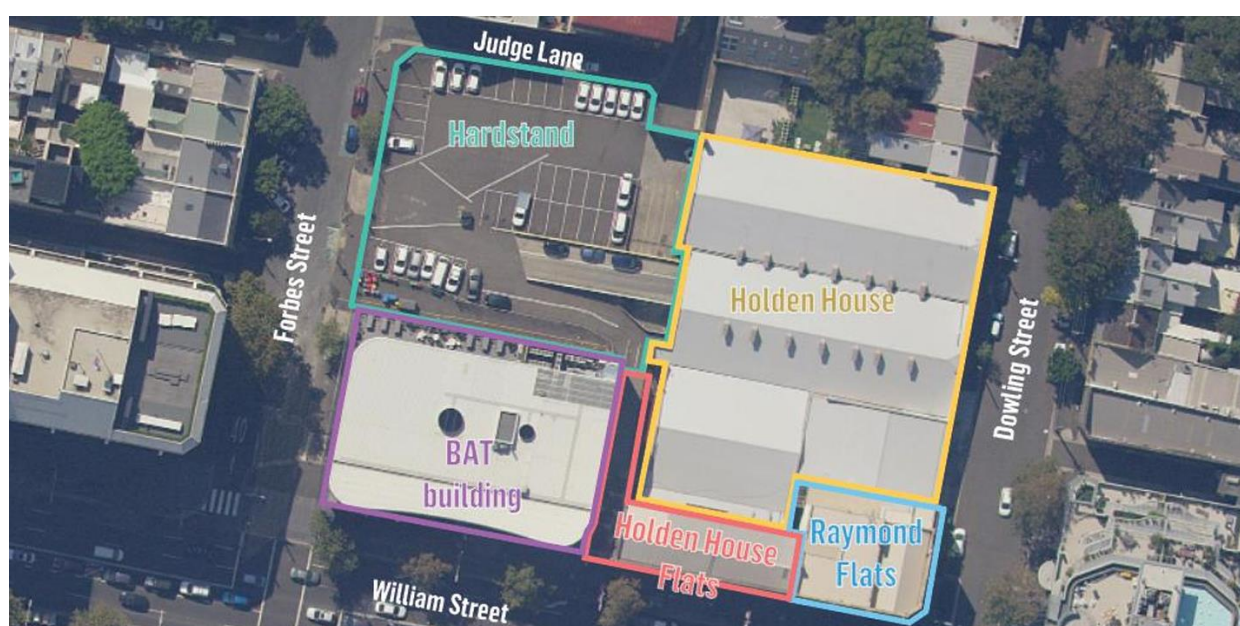
- Local Significance C71 to the northern boundary;
- Local Significance C16 north of William Street South; and
- Rosebank HCA, Local Significance, C14, which is located to the site's south-west and south-east (across William Street).

In addition to the above, the site is located within the vicinity of a number of heritage listed items, as identified in Schedule 5 of the Sydney LEP 2012. These include:

- Former commercial building “Bryson House” including façade and main stairs, 150-166 Forbes Street, Woolloomooloo (local significance, I2178)
- Terrace group including interiors, 168-172 Forbes Street, Woolloomooloo (local significance, I2179)
- Former warehouse “Cancer Council” including interior, 153-161 Dowling Street, Woolloomooloo (local significance I2166)
- Terrace group including interiors, 167-169 Dowling Street, Woolloomooloo (local significance, I2167)
- Commercial building “Chard’s Building” including interior, 171-175 William Street, Darlinghurst (local significance, I499)
- Commercial building “Grenville House” including interior, 177-185 William Street, Darlinghurst (local significance, I500)

The proposed works includes the demolition of the existing structures and buildings located on the subject site. Refer to **Table 27** below.

Figure 46: Aerial Image of the Site with Built Form Elements Identified



Source: SIX Maps 2022, with Urbis overlay

Table 27: Site Identification (Heritage)

Address	Built Form	Heritage Significance
164-172 William Street Lot 52 DP 1049805	4-storey commercial building (constructed 1959, but heavily modified)	The BAT building, constructed in 1956 as an archival office for the ABC, does not meet the criteria for heritage listing. Its original use has ceased, and it now houses commercial offices. Significant refurbishments, including façade glazing replacement and a new 4th floor addition, have compromised its historical and aesthetic character, making it largely contemporary and of little architectural interest.
174-194 William Street Lot 1 DP 816050	174-188 William Street ‘Holden House Flats’, 3-storey terraces (constructed c. 1921)	The Holden House Flats does not meet the criteria for heritage listing. Originally a typical shop-top style building, it was later integrated into the Holden House warehouse complex, resulting in significant alterations, including the removal of ground-floor frontages and over cladding of facades. The building's original internal fabric is unremarkable, and its rear façade is utilitarian. Despite being an example of Inter-War development, extensive modifications and its simple, utilitarian nature

Address	Built Form	Heritage Significance
		diminish its architectural merit. The building's association with Holden is brief and not of significant historical value.
190-194 William Street	'Raymond Flats', 3-storey terraces (constructed c. 1880s, converted c. 1925)	Raymond Flats does not meet the criteria for heritage listing. Despite reflecting the late-19th century development of William Street, extensive modifications, including the removal of ground-floor frontages and over-cladding of facades, have rendered it an unremarkable example of its type. The building's interior and exterior have been significantly altered, and it is in a derelict condition, diminishing its historical and architectural significance. Structural and BCA investigations determined that retaining the Raymond Flats building would require significant intervention to meet current standards. Given its lack of heritage significance and the extensive changes needed, demolition is considered the most feasible solution to achieve the development aims.
Dowling Street frontage	'Holden House', 2-storey warehouse buildings (constructed c. 1925 and later)	The former Holden House does not meet the criteria for heritage listing. Despite its historical interest in Sydney's early motor vehicle industry and its association with Holden, extensive modifications have rendered it a highly altered and unremarkable example of its type. The building's ability to communicate its historical narrative has been significantly diminished due to these changes.
North-western corner of site	Hardstand, open-air carparking, including concrete ramps	The existing hardstand area holds no historical, aesthetic, or social significance and does not demonstrate rarity or representative values. While it may have archaeological potential due to previous terrace development, further assessment is required.
174 William Street		The building at 174 William Street, constructed around 1908, does not meet the criteria for heritage listing. It is a typical but altered example of shop-top style development, later integrated into the Holden House complex, resulting in significant modifications including the removal of ground-floor frontages and over-cladding of the façade. The building retains minimal original fabric, which is unremarkable and in poor condition, and has no significant historical associations.

None of the structures located on the site are of heritage significance. As such, the HIS assesses the proposed demolition would be acceptable from a heritage perspective. This has been acknowledged and agreed through the existing concept DA.

In the context of the current proposal, it is necessary to ascertain the heritage significance of the heritage items and HCAs located in the vicinity of the site, in order to assess the potential impact of the proposed development on their established significance.

The development offers an opportunity to introduce contemporary forms that respect the adjacent Woolloomooloo HCA, while providing necessary development uplift in line with the scale of contemporary development along William Street. The proposal includes a lower-scale podium at the rear to transition to the lower scale of the HCA, with setbacks to mitigate potential impacts on adjacent residential developments.

Potential impacts on nearby HCAs, including William Street South and Rosebank, will be negligible and potentially positive. The development offers an opportunity to introduce contemporary forms that respect the adjacent Woolloomooloo HCA, while providing necessary development uplift in line with the scale of contemporary development along William Street. The proposal includes a lower-scale podium at the rear to transition to the lower scale of the HCA, with setbacks to mitigate potential impacts on adjacent residential developments.

The proposal aligns with applicable LEP and DCP controls, offering a high-quality built form that responds to the character and significance of these HCAs. Structural and BCA investigations have confirmed that retaining the existing buildings would require significant intervention, further supporting their removal. Overall, the proposed development is expected to enhance the site's aesthetic and align with the area's heritage and development goals.

As such, the proposal is recommended to the consent authority for approval on heritage grounds.

Archaeological Potential

A Historical Archaeological Assessment (**HAA**) and Historical Archaeological Research Design and Excavation Methodology (**HARDEM**) have been prepared for the proposed development and are attached at **Appendix QQ** and **Appendix RR**. The HAA has been undertaken to assess the potential impacts of the proposed works to any archaeological material on the site in accordance with State archaeological assessment guidelines.

Assessment found that while no listed archaeological items have been identified in the subject area, Low to Moderate and Low to High archaeological potential has been identified for locally significant historical relics associated with the early development and second stage development of the site. This is reflected in **Figure 47** below.

Figure 47: Archaeological Potential of Known Former Structural Features



Source: Six Maps with Urbis Overlay (HAA Report)

The proposed works include demolition and excavation of four basement levels so there is reasonable cause to suspect that the proposed works will impact historical relics. As such, further Archaeological investigation should be undertaken by a qualified archaeologist post demolition works and prior to any ground disturbing works in any area identified as a zone of moderate and high archaeological sensitivity.

The HARDEM has also been prepared for endorsement by Heritage NSW and to guide the archaeological monitoring and excavation on site. Archaeological monitoring and sampling will commence following completion of the demolition program down to slab level within the extant lower levels of the extant footprint in consultation with the archaeological team.

Aboriginal Cultural Heritage

An Aboriginal Objects Due Diligence Assessment (**ADD**) has been prepared by Urbis to investigate whether future development of the subject area is likely to impact any Aboriginal objects or places that may exist within or around the subject area (**Appendix SS**).

The ADD meets the due diligence requirements of the National Parks and Wildlife Act 1974 (NSW). This involved:

- Searches of the Australian Heritage Database (AHD), Aboriginal Heritage Information Management System (AHIMS) and State Heritage Inventory (SHI),
- Review of previous archaeological assessments relevant to the subject area,
- Landscape analysis,
- Analysis of historical land use and its impact on the subject area, and
- Visual inspection of the subject area.
- A visual inspection of the site was undertaken on the 1st of May 2025.

Potential Impacts

The above assessment determined that there are no registered Aboriginal objects or Aboriginal places on the site. While the proposed works will disturb the ground surface with the excavation of four basement levels, no other sources of information reviewed indicate that Aboriginal objects are likely to be retained within the subject area. The site is located within 200m of a former natural waterway which is indicative of past Aboriginal land use, however the entire site has been subject to significant ground disturbing activities and thus there are no landscape features that indicate the presence of Aboriginal Objects.

Based on the above findings, it is concluded that there is no known Aboriginal cultural heritage on or near the subject area, nor is it reasonably likely that Aboriginal cultural heritage occurs on or near the subject site.

As per the Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (DECCW 2010a), no additional Aboriginal cultural heritage assessment, such as the provision of an Aboriginal Cultural Heritage Assessment Report (ACHAR), is required.

Mitigation Measures

Based on the conclusions of the report's assessment, the following recommendations have been made:

Recommendation 1 – Submission of Report

- A copy of this report should be submitted with the Environmental Impact Statement (EIS) in support of SSD-80211463.

Recommendation 2 – Aboriginal Cultural Heritage Assessment Not Required

- In accordance with the due diligence process described in the Due Diligence Code and SEARs Item 21 for SSD-80211463, no further archaeological investigation is required for the subject area, subject to the following archaeological chance finds and human remains procedures being implemented and followed.

Recommendation 3 – Unexpected Archaeological Finds Procedure

- Should any archaeological deposits be uncovered during any site works, the following steps must be followed:

1. All works within the vicinity of the find must immediately stop and the location cordoned off with signage installed to stop any accidental impact to the finds. The find must not be moved 'out of the way' without assessment.
2. The site supervisor or another nominated site representative must contact either the project archaeologist (if relevant) or Heritage NSW (Enviroline 131 555) to contact a suitably qualified archaeologist.
3. The nominated archaeologist must examine the find, provide a preliminary assessment of significance, record the item and decide on appropriate management measures. Such management may require further consultation with Heritage NSW, preparation of a research design and archaeological investigation/salvage methodology and registration of the find with the Aboriginal Heritage Information Management System (AHIMS).
4. Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required and further archaeological investigation undertaken.
5. Reporting may need to be prepared regarding the find and approved management strategies.
6. Works in the vicinity of the find can only recommence upon receipt of approval from Heritage NSW.

Recommendation 4 – Human Remains Procedure

- In the unlikely event that human remains are uncovered during future works, the following steps must be followed:
4. All works within the vicinity of the find must immediately stop and the location cordoned off with signage installed to stop any accidental impact to the finds.
 5. The site supervisor or other nominated manager must notify the NSW Police and Heritage NSW (Enviroline 131 555).
 6. The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist.
 7. Management recommendations are to be formulated by the NSW Police, Heritage NSW and site representatives.
 8. Works are not to recommence until the find has been appropriately managed.

6.1.11. Waste Management

Elephants Foot Consulting has prepared an Operational Waste Management Plan (**OWMP**) (**Appendix LL**) which identifies all potential waste generation at the and operational phase of the development. The OWMP details how the various waste streams will be recycled or disposed of off-site.

6.1.11.1. Operational Waste Management

Residential Waste

The following table provides estimated waste generation rates for the residential portion of the proposed development. Calculation of rates is based on generic figures, and waste generation rates may differ according to the residents' actual management practice.

Table 28: Estimated Waste and Recycling Volumes – Residential

Building	#Units	General Waste Generation Rate (L/Unit/Week)	Generated General Waste (L/Week)	Recycling Generation Rate (L/Unit/Week)	Generated Recycling (L/Week)
Bright (Forbes Street)	40	120	4800	120	4800
FJC (William Street West)	136	120	16320	120	16320
FJC (William Street East)	79	120	9480	120	9480

Building	#Units	General Waste Generation Rate (L/Unit/Week)	Generated General Waste (L/Week)	Recycling Generation Rate (L/Unit/Week)	Generated Recycling (L/Week)
Tribe (Dowling Street)	30	120	3600	120	3600
TOTAL	285		34200		34200
Bins & Collections	General Waste Bin Size (L)		1100	Recycling Bin Size (L)	1100
	General Waste Collections per Week		1	Recycling Collections per Week	1
	Total General Waste Bins Required		33	Total Recycling Bins Required	33
Bins per Building	Core	# Bins		Core	# Bins
	Bright (Forbes Street)	5		A	5
	FJC (William Street West)	15		B	15
	FJC (William Street East)	9		C	9
	Tribe (Dowling Street)	4		D	4

Food Organics & Garden Organics (**FOGO**) waste generation is outlined in the following table.

Table 29: FOGO Volumes – Residential

Building	#Units	FOGO Waste Generation Rate (L/Unit/Week)	Generated FOGO Waste (L/Week)
Bright (Forbes Street)	40	8	320
FJC (William Street West)	136	8	1088
FJC (William Street East)	79	8	632
Tribe (Dowling Street)	30	8	240
TOTAL	285		2280
Bins & Collections	FOGO Bin Size (L)		120
	FOGO Collections per Week		1
	Total FOGO Bins Required		21
Bins Per Building Core	Core	# Bins	
	Bright (Forbes Street)	3	
	FJC (William Street West)	10	
	FJC (William Street East)	6	

Building	#Units	FOGO Waste Generation Rate (L/Unit/Week)	Generated FOGO Waste (L/Week)
		Tribe (Dowling Street)	2

All residents will have access to a storage area within their unit capable of holding separate waste streams. Dual waste chute systems for general waste and recycling will be installed with access on each residential level where residents dispose of waste. These will be transported to the chute discharge rooms located on the ground level where it will be compacted. FOGO waste will require residents to walk to the communal FOGO bin room and place it into the bins.

An area will be made available for storage of bulky waste within close proximity of the garbage and recycling bin collection room. Residents will need to liaise with building management regarding the transportation of bulky items.

Council will be engaged to collect the residential waste and recycling in accordance with the collection schedule. A council vehicle will enter the loading bay via Forbes Street and the building caretaker will provide the driver with access to the residential waste rooms.

Commercial and Retail Waste

In addition to residential waste management, the OWMP demonstrates the estimated waste generation for the commercial and retail uses. The CoS's *Guidelines for Waste Management in New Developments (2018)* was used to calculate the number of bins required for future tenants.

Table 30: Estimated Waste and Recycling Volumes – Non-Residential

Tenancy Type	GFA sqm	Waste Generation Rate (L/100sqm/Day)	Generated Waste (L/Week)	Recycling Generation Rate (L/100sqm/Day)	Generated Recycling (L/Week)
Restaurant	1118	100	7825.3	500	27947.5
Retail: General	479	25	838.4	200	4791.0
TOTAL	1597		8664		32739
Bins and Collections		Bin Size (L)	1100	Bine Size (L)	240
		Bins/Week	7.9	Bins/Week	23.8
		Collections/Week	3	Collections/Week	3
		Total Bins	3	Total Bins	8

FOGO waste generation for non-residential uses on the site is outlined in the following table.

Table 31: FOGO Volumes – Non-Residential

Tenancy Type	GFA	FOGO Generation Rate (L/100sqm/Day)	Generated FOGO (L/Week)
Restaurant	1118	100	5589.5
Retail: General	479	5	119.8
TOTAL	1597		5709
Bins and Collections		Bin Size (L)	240
		Bins/Week	23.8

Tenancy Type	GFA	FOGO Generation Rate (L/100sqm/Day)	Generated FOGO (L/Week)
		Collections/Week	3
		Total Bins	8

On completion of trade each day, nominated staff or contracted cleaners will transport all general waste, recycling and FOGO to the commercial/retail bin room, and place into the appropriate bins.

A private waste contractor will be engaged to service the retail waste and recycling bins per an agreed schedule. The private waste collection vehicle will enter the loading area from Forbes Street and parking in the loading bay via the turntable. The building caretaker will provide the contractor with access to the commercial/retail bin room. The collection of commercial and retail waste is to occur on separate days from the collection of residential waste to ensure smooth operation and the proper segregation of waste streams.

The table below provides a summary of the areas allocated for waste storage and collection areas.

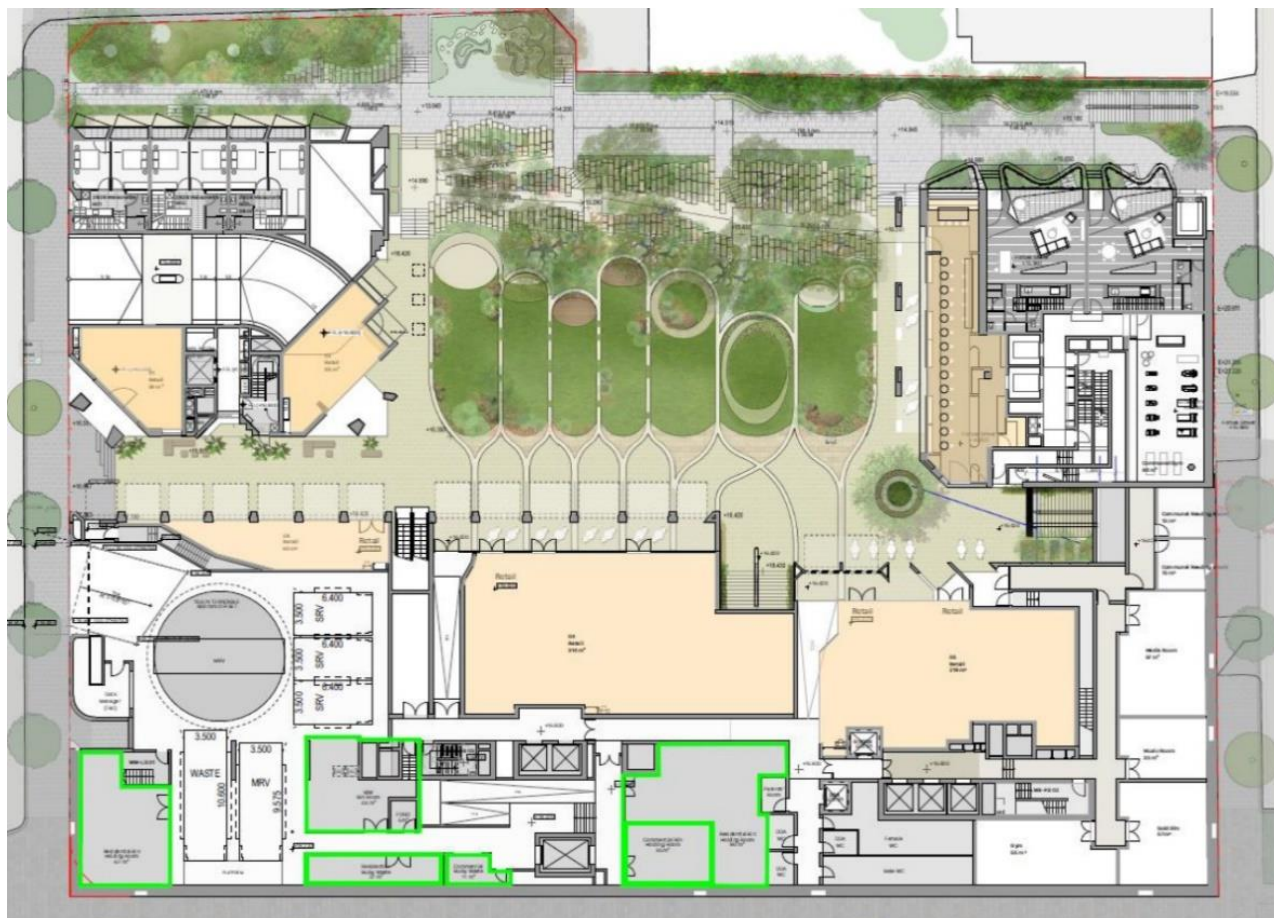
Table 32: Waste Room Areas

Level	Waste Room Type	Equipment	Estimated Area Required (sqm)	Actual Area Provided (sqm)
B01	Bright (Forbes Street) Chute Discharge Room	<u>Service bins:</u> General waste: 1 x 1100L bin Recycling: 1 x 1100L bin <u>Equipment:</u> General waste 2-bin 1100L linear tracks Recycling: 2-bin 1100L linear track	27	33
B01	FJC (William Street West) Chute Discharge Room	<u>Service bins:</u> General waste: 1 x 1100L bin Recycling: 2 x 1100L bin <u>Equipment:</u> General waste: 3-bin 1100L linear tracks Recycling: 3-bin 1100L linear track	39	44
B01	FJC (William Street East) Chute Discharge Room	<u>Service bins:</u> General waste: 1 x 1100L bin Recycling: 2 x 1100L bin <u>Equipment:</u> General waste 2-bin 1100L linear tracks Recycling: 3-bin 1100L linear track	34	52
B01	Tribe (Dowling Street)	<u>Service bins:</u> General waste: 1 x 1100L bin Recycling: 1 x 1100L bin <u>Equipment:</u> General waste 2-bin 1100L linear tracks Recycling: 2-bin 1100L linear track	27	25
Plaza Level	Residential Bin Holding Room	General waste: 18 x 1100L bins Recycling: 33 x 1100L bins FOGO: 21 x 120L bins 1 x Bin tug	153	157 combined
Plaza Level	Residential Bulky & Speciality Waste Room	Textiles: 1 x 1100L Bin eWaste 1 x 240L bin *includes 2sqm additional for textiles/eWaste	26	27

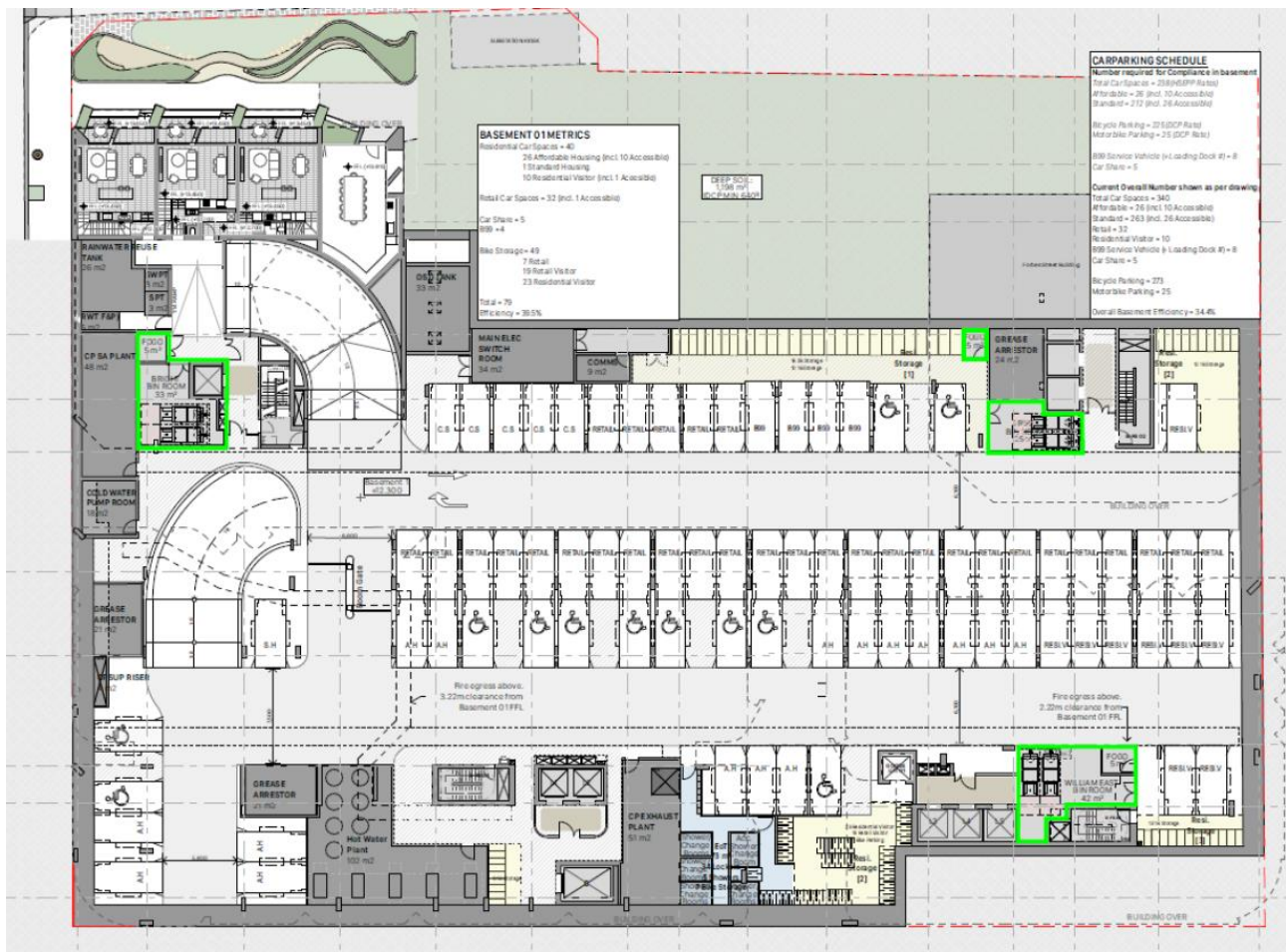
Level	Waste Room Type	Equipment	Estimated Area Required (sqm)	Actual Area Provided (sqm)
Plaza Level	Commercial / Retail Bin Room	General waste: 3 x 1100L bins Recycling: 6 x 1100L bins FOGO: 8 x 120L bins 1 x Bin tug	35	35
Plaza Level	Commercial / Bulky Waste Room		4	11

As demonstrated above, the proposed development provides adequate waste rooms to service both the residential and commercial areas of the site. This is further demonstrated in the plans below.

Figure 48: Waste Room Locations



Picture 18: Plaza Level 1 Waste Room Locations



Picture 19: Basement Level 01 Waste Room Locations

Source: FJC Studio

Mitigation Measures

OWMP

- Educational materials are to be provided consistently on a regular basis to all staff and contractors to encourage behaviour change and account for transient building personnel such as new tenants, or cleaning staff.
- Signage and education are essential components to support best practice waste management. Appropriate signage must be prominently displayed on doors, walls and above all bins, clearly stating what type of waste or recyclables is to be placed in each bin.
- School management shall be responsible for minimising dispersion of site litter and prevent stormwater pollution to avoid impact to the environment and local amenity. This can be done by ensuring all bin rooms are secure and taking action to prevent dumping.
- The bins are to be cleaned by the building manager or cleaners periodically to ensure hygiene and minimise odour.

6.1.12. Contamination and Remediation

A Detailed Site Investigation (DSI) was undertaken by Douglas and Partners to assess potential contamination on the site in support of the proposed development. The investigation aimed to identify any existing contamination and determine the need for remediation to ensure the site is suitable for its intended use.

It is noted that as part of the Concept DA, the contamination and remediation matters were assessed and determined to be suitable and appropriate for the site.

6.1.12.1. Potential Impacts

The DSI found that the existing fill material on the site is likely impacted by common contaminants, including polycyclic aromatic hydrocarbons (**PAHs**), lead, and other hydrocarbons. In some areas, the natural soil beneath the fill may also be affected. Additionally, hydrocarbon contamination was identified near the locations of decommissioned underground storage tanks (**USTs**), and there is a possibility that further tanks may still be present on site.

Borehole sampling confirmed elevated concentrations of lead and PAHs in some fill layers. These contaminated materials will require appropriate remediation and/or waste classification before removal, particularly in areas designated for bulk excavation.

To address these issues, a Remediation Action Plan (**RAP**) has been prepared by Douglas and Partners and is submitted with the SSDA (see **Appendix DD**). The RAP outlines the following key actions:

- Demarcation of the deep soil zone and laneway post-demolition.
- Installation and sampling of groundwater monitoring wells around the site perimeter.
- Preparation of a Dewatering Management Plan (**DWMP**) if groundwater levels or quality require it.
- Supplementary Data Gap Assessment (**DGA**) testing across the site, including the deep soil zone and laneway, using test pits with sufficient sampling density for statistical analysis and waste classification.
- Investigation and removal of any remaining underground tanks in accordance with UPSS guidelines and relevant Australian Standards.
- Classification of remaining fill for off-site disposal using in situ or stockpile testing methods.
- Excavation of fill as part of bulk earthworks, with appropriate segregation and handling of different waste types to prevent cross-contamination.
- Validation of remaining soil in excavation areas to confirm suitability for future use.

The RAP also specifies that the following reports will be prepared prior to remediation works:

- Groundwater Data Gap Investigation Report
- Data Gap Assessment Report
- In-situ Waste Classification Report

The research undertaken by Douglas and Partners confirms that, subject to the full implementation of the RAP, the site can be made suitable for the proposed development. In alignment with the findings of the Concept Approval, Council's Health Unit supports this conclusion.

Mitigation Measures

- Preparation of a RAP to outline the soil remediation and management protocols based on the outcomes of this DSI.
- Further targeted assessment of the contamination status of soils following the demolition and removal of existing buildings, including (but not necessarily limited to):
 - The two known UST locations; and
 - The location of previous bowlers and UST infrastructure.
- Confirmation of the preliminary waste classifications through additional soil investigations which are to be conducted prior to the disposal of any soil off-site during bulk excavation works;
- A hazardous building material survey prior to the demolition of any structures on site, following by the removal of hazardous building materials in accordance with current regulations which may be conducted as part of the construction phase of the project; and
- Completion and validation of remediation works as stipulated in the RAP following demolition and bulk excavation works at the site.

6.1.12.2. Remediation

The RAP, at **Appendix DD**, was prepared in accordance with the above recommendations set out in the DSI. The objectives of the RAP are to address potentially unacceptable risks as a result of contamination and outline a strategy to render the site suitable for the proposed development from a contamination perspective.

The RAP details the following remediation areas:

- **Remediation Area 1:** This area includes Benzo(a)pyrene (B(a)P) impacted fill near boreholes BH2, BH4, and BH6, and TRH impacted fill near BH3, BH4, and BH6, particularly in the deep soil zone (**DSZ**).
- **Remediation Area 2:** This area covers heterogeneous fill across the site, including lead-impacted fill near BH102 and anthropogenic inclusions. This fill will be excavated as part of the bulk excavation works for the basement.
- **Remediation Area 3:** This area involves former USTs, associated infrastructure, and tank pits. One of the USTs is located in the DSZ.
- **Remediation Area 4:** This area includes the footprints of existing structures, which pose a high risk for undetected asbestos or potential asbestos contamination generated during demolition.

The RAP outlines that the majority of the site will be excavated to form the proposed basement, and the soils within the identified remediation areas are considered surplus to the proposed development.

Key protocols addressed in the RAP include:

- Waste classification protocols for soils to be removed from the site.
- Management of anticipated contaminated soils in the vicinity of the former USTs.
- An unexpected finds protocol to manage unexpected contamination.
- Evaluation of remediation options for contaminated soil around the former USTs and unexpected finds.
- Methodology for groundwater investigation works to characterize groundwater, including for VOCs from offsite sources.
- Nomination of the preferred remediation option(s).
- Methodology for the validation of remediation work.
- Contingency measures for further assessment.

Groundwater investigation works may be required to address data gaps regarding potential contamination risks to groundwater. These investigations will be undertaken as part of the data gap assessment (**DGA**) following building demolition and removal of the USTs.

The preferred remediation strategy involves excavation and off-site disposal of PAH/TRH/lead impacted soils and materials from UST excavations. This approach is considered the most practical due to the required bulk excavation and space constraints. On-site treatment of soil impacted by hydrocarbons (land farming) is not feasible due to these constraints.

The RAP includes a detailed validation sampling plan, which will be implemented following the results of the DGA. The overarching remediation acceptance criterion (**RAC**) will be used to ensure there are no unacceptable risks posed by soils, groundwater, or soil vapour to human health or the environment.

Additional areas of contamination encountered during remediation and site redevelopment will be subject to the contingency plan or unexpected finds protocol and assessed using the RAC.

The RAP proposes the following remediation strategy:

- Demarcate the DSZ and laneway following demolition.
- Install and sample groundwater wells around the site perimeter.
- Prepare a Dewatering Management Plan (DWMP) based on groundwater levels and water quality monitoring results.

- Undertake supplementary DGA testing in the DSZ, laneway, and remainder of the site using test pits.
- Determine the presence of additional tanks and remove them according to relevant regulations.
- Classify remaining fill for off-site disposal using test pits or stockpile testing methods.
- Excavate fill across the site as part of bulk earthworks.
- Segregate and handle waste of different classifications to minimize cross-contamination.
- Validate remaining side walls and floor in natural soil or rock.

The RAP also includes a comprehensive plan for the removal and validation of USTs and associated infrastructure, as well as the off-site disposal of contaminated soils. The Environmental Consultant will guide the excavation and validation process, ensuring compliance with regulatory requirements and providing a Remediation and Validation Report upon completion.

6.1.13. Social Impact

Urbis has prepared a Social Impact Assessment (**SIA**) for the proposal which is attached in **Appendix NN**. The SIA involved a comprehensive study to identify potential positive and negative social impacts, propose appropriate mitigation and enhancement measures, and provide recommendations aligned with professional standards and statutory obligations.

The DPHI Social Impact Assessment Guideline (2023) outlines that an SIA should consider likely changes to social elements of value to people, including way of life, community, accessibility, culture, health and wellbeing, surroundings, livelihoods, and decision-making systems. The SIA aligns with the NSW DPHI's Social Impact Assessment Guideline 2022 and industry best practices.

The expected and perceived impacts of the development proposal have been assessed against the established social and contextual baseline and by the predicted changes that are likely as a result of the proposed development.

6.1.13.1. Potential Impacts

A summary of the potential positive and negative social impacts identified are provided in **Table 33** below.

Table 33: Social Impacts Summary

Impact category	Impact description	Mitigated assessment	Recommendations provided
Way of life	Change in housing diversity and affordability	High positive for the surrounding social locality (people across Greater Sydney seeking housing in Woolloomooloo)	▪ Following lodgement of the proposal, provide the local community information about affordable housing, including its benefits to low- and medium-income households such as essential workers. The information should aim to avoid any confusion between affordable housing and social housing. ▪ Develop a strategy with the CHP to support community cohesion and local social connectedness amongst all residents, including affordable housing residents. This strategy should also consider the integration of the incoming residents into the suburb, which may present more socio-economic diversity than the targeted population of this proposal.
Community	Perceived impact on sense of community	Medium positive for the immediate social locality (current and future residents)	▪ Consider undertaking a community open day once the site is operational to invite the community in and facilitate community connections. ▪ Consider ongoing programs and events for residents and the broader local community that will foster a sense of belonging and community cohesion.

Impact category	Impact description	Mitigated assessment	Recommendations provided
			Consider public art initiatives to recognise and celebrate the mixed and diverse community of Woolloomooloo. This could include curating public art that engages the local communities in art projects and that showcases the suburb's unique characteristics.
Community	Impact on local character and heritage values of the area	Medium positive for the immediate and surrounding social locality (current residents and visitors)	- Ensure that any public art strategy for the proposed development recognises and celebrates the character and heritage of the local area. The strategy should be actively communicated to the local community to reduce community concerns. It should include guidelines for selecting and curating artworks and the allocation of spaces for potential art installations, murals and exhibitions. The strategy should propose partnerships with local art schools, galleries, and cultural organisations. - If art installations are installed on-site, establish a selection process that prioritises local talent to reflect the local community character.
Accessibility	Increased connectivity to jobs, infrastructure, services and facilities	High positive for the immediate and surrounding social locality (current residents and visitors)	- It is recommended that the proponent discuss the proposal's integration into the existing and surrounding pedestrian and cycle network with Council, Transport for NSW and any relevant active transport groups. - Consider incorporating end-of-trip facilities and secured bike storage for incoming workers of the proposal (in addition to the facilities provided for residents). - Provide information to incoming residents on local facilities and amenities, through materials such as welcoming packs and display posters in communal areas.
Accessibility	Increased demand on services, facilities and open space	Medium positive for the immediate and surrounding social locality (current residents and visitors)	- With the review of social infrastructure and open space in this report being high-level, the proponent is advised to undertake a community infrastructure assessment (including Council engagement) to understand in more depth the potential needs and pressure associated with the proposal. - During the detailed stage, ensure that the open space is accessible and incorporates universal design principles for people of all abilities, especially in consideration of the site's sloping topography. - It is recommended that Council and other state and non-profit social infrastructure and services providers continue to monitor supply and demand for social infrastructure and services associated with population growth attributed to this and other similar developments in Woolloomooloo, to seek to ensure adequate provision to meet demand.
Accessibility	Impact on local road network, including carparking and pedestrian access	Low positive (construction and operation) for the immediate and surrounding social locality (current and future residents, site users and visitors)	- Develop and implement a final CTPMP and GTP, in consultation with key stakeholders. - Consider developing and implementing a communication and engagement strategy for the construction period (as part of the Construction Management Plan) to ensure effective and ongoing communication with the surrounding community (including in relation to traffic/ local

Impact category	Impact description	Mitigated assessment	Recommendations provided
			road access changes), provide an opportunity for the community to express queries and concerns, and enable the proponent to address any issues.
Culture	Potential impacts on sites of Aboriginal significance	Medium positive (construction and operation) for the immediate social locality (local Aboriginal people and communities, future residents and visitors)	- Communicate Designing with Country initiatives within the architectural and landscape design clearly to the local community where appropriate (e.g. signage). - Investigate initiatives to provide targeted employment and training opportunities for Aboriginal and Torres Strait Islander people during the construction period.
Health and Wellbeing	Wellbeing impacts during construction	Low negative for the immediate social locality (current residents, workers and visitors)	- Continued community consultation is recommended to keep residents informed of construction periods and significant milestones in the project's construction. - It is recommended that both the construction contractor and the proponent consult with surrounding future developments to understand expected construction timelines and activities, and coordinate schedules and mitigation measures (for example, relief days). This should then be reflected in the detailed Construction Traffic and Pedestrian Management Plan (CTPMP) and the detailed Excavation and Construction Management Plan (ECMP). The ECMP should also note site specific plant and equipment to be used and noise and vibration management procedures.
Surroundings	Contribution to activation and safety of Woolloomooloo and surrounding districts	High positive for the immediate social locality (current and future residents, local businesses, site users and visitors)	- Implement relevant CPTED recommendations to ensure the safety of the incoming residents and ensure that the new public space does not create a place for visitors with anti-social behaviours to gather, especially at nighttime. - Due to the high level of crimes and offences around the site, provide additional security on-site during the construction period to prevent and deter common offences in the local area. This could include hiring security personnel, installing temporary CCTV cameras, implementing controlled access points, and providing secure storage for construction equipment. - In consideration of the high proportion of homelessness in the vicinity of the site and the potential for the public space to host a portion of this population, it is advised that the proponent work with Council and local support services to provide support and programming for these individuals. This could be part of a broader community contribution, ensuring that the development not only addresses immediate safety and security concerns but also fosters inclusivity and support for vulnerable populations.
Surroundings	Visual impact and overshadowing	Low positive for the immediate social	Communicate with neighbours about the impacts of the development and design

Impact category	Impact description	Mitigated assessment	Recommendations provided
	surrounding dwellings	locality (surrounding residents and businesses)	considerations which reduce the shadow impact and/or reduce prolonged shadow-cast, and all design provide to enhance the visual amenity.
Livelihoods	Supporting improved employment opportunities (through construction, commercial and retail offerings)	High positive (construction and operation) for the local and regional workforce (including young working population, low-income residents, and community members)	Consider developing and implementing local employment/procurement strategies and programs that provide opportunities to source locally and/or support marginalised groups in the community.
Decision-making systems	Ability for people to make informed contributions to decision-making processes that impact them	Low positive (construction and operation) for the immediate and surrounding social locality (current residents)	- Ensure ongoing community communication and engagement throughout all planning, design, construction and operation phases. - Clearly demonstrate how community concerns and ideas have been addressed and adopted in the plans for the development.
Cumulative social impacts	A discussion on cumulative social impacts is outlined in Chapter 6.3 of the SIA. This includes the following cumulative social impacts: - Cumulative social impacts during construction - Cumulative pressure on existing services, facilities and open space - Contribution to housing supply - Contribution to local employment opportunities - Cumulative change to local character		- Develop a Construction Noise and Vibration Management Plan at the Construction Certificate (CC) stage which consider potential cumulative impacts from surrounding developments. - Coordinate construction activities and management measures across associated adjoining developments to minimise impacts on surrounding residents. This includes coordinating construction 'relief' days. - Implement ongoing community engagement and regular monitoring to minimise disturbances associated with multiple residential developments occurring simultaneously. - Monitor updated forecasted local facilities and services needs throughout the project timeline. This needs the proponent to develop relationships with key State Government agencies and Council to manage the impact of additional pressure on transport networks, services, facilities, and open space. - Undertake community days within the proposal once operational and incorporate public art reflecting local values into the building design and public realm areas to foster sense of belonging to current residents.

Mitigation Measures

Overall, the Urbis assessment and evaluation against the established categories of social impact demonstrate that the proposal is likely to generate a range of positive social improvements to the people and places within the immediate locality.

The potential impacts outlined above can be effectively mitigated through the implementation of a range of measures, as well as effective coordination and planning of potentially disruptive activities including:

Communication

- Following lodgement of the proposal, provide the local community information about affordable housing, including its benefits to low- and medium-income households such as essential workers. The information should aim to avoid any confusion between affordable housing and social housing.
- Consider undertaking a community open day once the site is operational to invite the community in and facilitate community connections.
- Provide information to incoming residents on local facilities and amenities, through materials such as welcoming packs and display posters in communal areas.
- Continued community consultation is recommended to keep residents informed of construction periods and significant milestones in the project's construction.
- Communicate with neighbours about the impacts of the development and design considerations which reduce the shadow impact and/or reduce prolonged shadow-cast, and all design provide to enhance the visual amenity
- Ensure ongoing community communication and engagement throughout all planning, design, construction and operation phases.
- Implement ongoing community engagement and regular monitoring to minimise disturbances associated with multiple residential developments occurring simultaneously.
- Undertake community days within the proposal once operational and incorporate public art reflecting local values into the building design and public realm areas to foster sense of belonging to current residents.

Design

- Ensure that any public art strategy for the proposed development recognises and celebrates the character and heritage of the local area. The strategy should be actively communicated to the local community to reduce community concerns. It should include guidelines for selecting and curating artworks and the allocation of spaces for potential art installations, murals and exhibitions. The strategy should propose partnerships with local art schools, galleries, and cultural organisations.
- If art installations are installed on-site, establish a selection process that prioritises local talent to reflect the local community character.
- During the detailed stage, and as recommended by Council, ensure that the open space is accessible and incorporates universal design principles for people of all abilities especially in consideration of the site's sloping topography.
- Communicate Designing with Country initiatives within the architectural and landscape design clearly to the local community where appropriate (e.g. signage).
- Implement relevant CPTED recommendations to ensure the safety of the incoming residents and ensure that the new public space does not create a place for visitors with anti-social behaviours to gather, especially at nighttime.
- Clearly demonstrate how community concerns and ideas have been addressed and adopted in the plans for the development.

Construction Management and Opportunities

- Develop and implement a final CTPMP and GTP, in consultation with key stakeholders
- Consider developing and implementing a communication and engagement strategy for the construction period (as part of the Construction Management Plan) to ensure effective and ongoing communication with the surrounding community (including in relation to traffic/ local road access changes), provide an opportunity for the community to express queries and concerns, and enable the proponent to address any issues.
- Investigate initiatives to provide targeted employment and training opportunities for Aboriginal and Torres Strait Islander people during the construction period.

- It is recommended that both the construction contractor and the proponent consult with surrounding future developments to understand expected construction timelines and activities, and coordinate schedules and mitigation measures (for example, relief days). This should then be reflected in the detailed Construction Traffic and Pedestrian Management Plan (CTPMP) and the detailed Excavation and Construction Management Plan (ECMP). The ECMP should also note site specific plant and equipment to be used and noise and vibration management procedures.
- Due to the high level of crimes and offences around the site, provide additional security on-site during the construction period to prevent and deter common offences in the local area. This could include hiring security personnel, installing temporary CCTV cameras, implementing controlled access points, and providing secure storage for construction equipment.
- Develop a Construction Noise and Vibration Management Plan at the Construction Certificate (CC) stage which consider potential cumulative impacts from surrounding developments.
- Coordinate construction activities and management measures across associated adjoining developments to minimise impacts on surrounding residents. This includes coordinating construction 'relief' days.

Operation Management and Opportunities

- Develop a strategy with the CHP to support community cohesion and local social connectedness amongst all residents, including affordable housing residents. This strategy should also consider the integration of the incoming residents into the suburb, which may present more socio-economic diversity than the targeted population of this proposal.
- Consider ongoing programs and events for residents and the broader local community that will foster a sense of belonging and community cohesion.
- Consider public art initiatives to recognise and celebrate the mixed and diverse community of Woolloomooloo. This could include curating public art that engages the local communities in art projects and that showcases the suburb's unique characteristics.
- It is recommended that the proponent discuss the proposal's integration into the existing and surrounding pedestrian and cycle network with Council, Transport for NSW and any relevant active transport groups.
- Consider incorporating end-of-trip facilities and secured bike storage for incoming workers of the proposal (in addition to the facilities provided for residents).
- With the review of social infrastructure and open space in this report being high-level, the proponent is advised to undertake a community infrastructure assessment (including Council engagement) to understand in more depth the potential needs and pressure associated with the proposal.
- It is recommended that Council and other state and non-profit social infrastructure and services providers continue to monitor supply and demand for social infrastructure and services associated with population growth attributed to this and other similar developments in Woolloomooloo, to seek to ensure adequate provision to meet demand.
- In consideration of the high proportion of homelessness in the vicinity of the site and the potential for the public space to host a portion of this population, it is advised that the proponent work with Council and local support services to provide support and programming for these individuals. This could be part of a broader community contribution, ensuring that the development not only addresses immediate safety and security concerns but also fosters inclusivity and support for vulnerable populations.
- Consider developing and implementing local employment/procurement strategies and programs that provide opportunities to source locally and/or support marginalised groups in the community.
- Monitor updated forecasted local facilities and services needs throughout the project timeline. This needs the proponent to develop relationships with key State Government agencies and Council to manage the impact of additional pressure on transport networks, services, facilities, and open space.

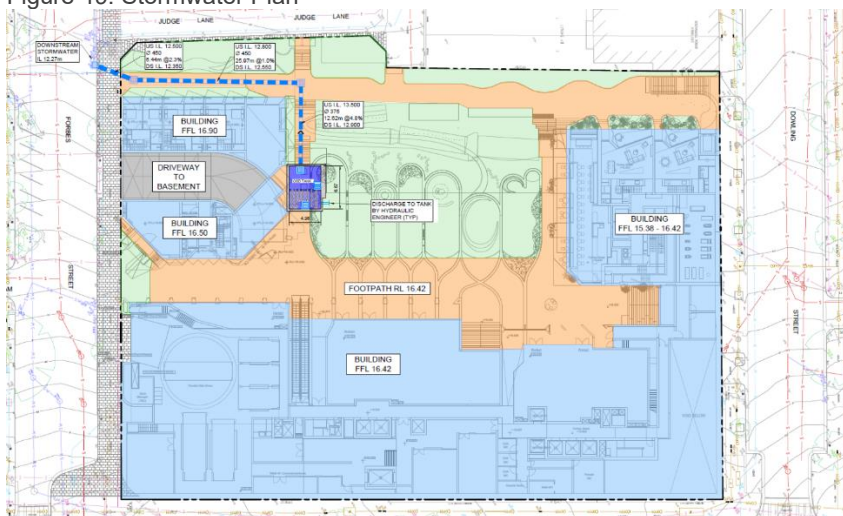
6.2. Standard Impact Assessment

This section of the report addresses the matters which require a standard impact assessment. It outlines the findings of the assessment and the key mitigation measures used to ensure compliance with the relevant standards or performance measures.

Table 34: Standard Impact Assessment

SEARs Item	Assessment
11. Water Management - Detail the proposed drainage design and servicing infrastructure to be incorporated as part of the development (stormwater and wastewater). - Demonstrate how the development complies with council's drainage requirements and identify proposed stormwater treatment and water quality management measures to minimise adverse environmental impacts.	An Integrated Water Management Plan (IWMP) has been prepared by TTW and is included at Appendix X. The IWMP outlines the proposed stormwater management strategies and demonstrates compliance with the CoS's DCP and Technical Specifications. Stormwater Quantity On the 5th of August 2024, Sydney Water confirmed over email that an Onsite Detention Tank (OSD) with minimum storage of 100m³ and Permissible Site Discharge of 237L/s will be required for the site. All roof water collected from the proposed development will be directed to a 20KL rainwater tank via gutters and downpipes sized for the 1% AEP flow rates. Overflow from tanks as well as stormwater from the network of in-ground puts and pipes will be conveyed to the OSD tanks. From here, stormwater will be discharged to the existing pit on Forbes Street, as shown in Error! Reference source not found. below. DRAINS modelling undertaken found that the 100-year Annual Recurrence Interval (ARI) result shows that the OSD tank, with a minimum storage volume of 68m³, can release a flow of 233 L/s to the existing pit on Forbes Street which meets Sydney Water's specifications.

Figure 49: Stormwater Plan



Source: TTW

Stormwater Quality

Stormwater quality treatment is to be done in line with the targets set out in Section 3.7.3 of the Sydney DCP 2012, as shown in **Table 35** below.

A combination of treatment options is proposed for the site to reduce the discharge of pollutants from roof, paved and other impermeable surfaces into surrounding waterways and Council drainage systems. These include:

- 27 x 690 filter cartridges (Ocean Protect StormFilter Cartridges)
- 6 x gross pollutant traps (Oceanguard gross pollutant traps)
- 1 x 20KL rainwater tank

MUSIC modelling has been conducted with the above elements and has confirmed the proposed reductions in the below table.

SEARs Item	Assessment															
	Table 35: Pollutant Reduction Targets and Results <table><tr><th>Water Quality Parameters</th><th>Pollutant Reduction Targets</th><th>Proposed Reduction</th></tr><tr><td>Total Suspended Solids (TSS)</td><td>85%</td><td>85.27%</td></tr><tr><td>Total Phosphorus (TP)</td><td>65%</td><td>71.63%</td></tr><tr><td>Total Nitrogen (TN)</td><td>45%</td><td>50.25%</td></tr><tr><td>Gross Pollutants</td><td>90% (>5mm)</td><td>99.94%</td></tr></table> <u>Erosion and Sediment Control</u> An Erosion and Sediment Control Plan is provided at Appendix B of the IWMP to mitigate and manage runoff and degradation of downstream watercourses. <u>Mitigation Measures</u> Following the implementation of the below mitigation measures, the remaining impacts are appropriate. ▪ Erosion and sediment control ▪ Installation of OSD tank to meet minimum storage and Permissible Site Discharge (PSD) requirements specified by Sydney Water ▪ Operation of stormwater quality treatment train ▪ Implementation of the proposed stormwater management strategy shown in the civil engineering drawings and attached to the IWMP.	Water Quality Parameters	Pollutant Reduction Targets	Proposed Reduction	Total Suspended Solids (TSS)	85%	85.27%	Total Phosphorus (TP)	65%	71.63%	Total Nitrogen (TN)	45%	50.25%	Gross Pollutants	90% (>5mm)	99.94%
Water Quality Parameters	Pollutant Reduction Targets	Proposed Reduction														
Total Suspended Solids (TSS)	85%	85.27%														
Total Phosphorus (TP)	65%	71.63%														
Total Nitrogen (TN)	45%	50.25%														
Gross Pollutants	90% (>5mm)	99.94%														
12. Ground and Groundwater Conditions ▪ Assess potential impacts on soil resources and related infrastructure and riparian lands on and near the site and including soil erosion. ▪ Where required provide a Groundwater Impact Assessment in accordance with relevant Groundwater Guidelines. If the proposed development is on land identified as having high salinity or acid sulfate soil potential in an EPI provide a Salinity Management Plan or Acid Sulfate Soil Management Plan that includes appropriate management measures and strategies.	<u>Ground</u> A Report on Geotechnical Investigation has been prepared by Douglas Partners to investigate subsurface conditions across the site to inform the proposed design. The existing site is developed, with most of the ground surface covered with concrete. A desktop geological assessment has indicated that the site is underlain by Hawkesbury Sandstone of the Triassic Period and is within the Hawkesbury colluvial soil landscape unit. The Cross City Tunnel is located underneath William Street, with the Eastbound Mainline understood to be located just outside the site's southern boundary. The results of the borehole drilling found: ▪ Asphaltic concrete or concrete slab underlain by gravel or sandy gravel to depths of 0.2m to 1.1m within the basements. ▪ A range of soils observed to a depth of 4.3m with ironstone bands below 2.5m. ▪ Sandstone (Hawkesbury Sandstone) initially low / medium strength, graded to fresh medium to high strength. ▪ Laminite (Hawkesbury Sandstone) observed between 10m and 16.7m at low to medium strength with extremely weathered bands. ▪ Sandstone (Hawkesbury Sandstone) medium to high strength, fresh and slightly fractured to unbroken. ▪ The proposed basement will require excavation to depths between 9m to 12m below the existing ground levels, which will likely encounter soils and medium to high strength sandstone. ▪ Horizontal movements due to stress relief is expected to occur during the excavation of rock. Movement can occur over a distance of up to three times the excavated rock depth. Most of this movement would likely occur progressively during the excavation and heave may occur where relatively thin beds of rock are left in the base. Careful consideration will need to be given to the effects of stress rock relief on the existing neighbouring structures and surrounding services during construction.															

SEARs Item	Assessment
	▪ Temporary and permanent retention systems are necessary to support excavation faces, particularly along property boundaries. Shoring systems should be designed to account for soil and rock pressures, surcharge loads, and allowable deformation limits. The use of ground anchors, rockbolts, and dowels may be required to provide additional support. ▪ Foundations are to be designed based on the allowable bearing pressures and modulus values provided in the report. The presence of defects, bedding planes, and weak seams in the rock must be considered in the design to ensure stability and minimise settlement. ▪ The use of heavy excavation equipment can generate vibrations that may affect nearby structures and inhabitants. A vibration trial is recommended at the commencement of rock excavation to determine appropriate equipment and methods. ▪ Further geotechnical investigations, including inspection slots during early demolition stages, are recommended to confirm subsurface profiles and shoring design parameters. A detailed Inspection Test Plan and Geotechnical Monitoring Plan are to be developed prior to construction. Groundwater A Groundwater Impact Assessment has been prepared by Douglas Partners to investigate groundwater conditions and drainage. The investigation included the installation of three (3) groundwater wells and laboratory testing of selected samples. The proposed excavation of the basements will extend below the recorded water levels and seepage is expected along the top of rock (particularly after periods of wet weather) and through the rock joints and bedding planes. Groundwater flow is typically towards the southwest of the site due to the presence of the Cross City Tunnel and its drainage. A seepage analysis has been undertaken on the site using the maximum recorded groundwater levels. It found that the predicted annual inflow into the drained basement is 0.4ML. The cumulative flow for the construction dewatering period is expected to be 1.8ML based on this modelling. A Water Access Licence (WAL) is not required as the inflow rate is predicted to be less than 3ML per year. The basement is intended to be drained, which is determined to be the most feasible option without significant impacts on surrounding groundwater systems or property, subject to review and approval from DCCEEW and other relevant authorities. Extracted groundwater will be disposed of via stormwater after it is treated to meet water quality standard. A detailed treatment schematic plan will be provided in the detailed groundwater plan prior to construction.
15. Ecologically Sustainable Development (ESD)	Green Perch has prepared an ESD Report (Appendix HH), BASIX Certificate (Appendix U), NatHERS Certificate (Appendix V) and the Section J Analysis Report (Appendix II) discuss the sustainability principles incorporated into the proposed development and summarise BASIX and thermal comfort aspects. The proposal has addressed the principles of ESD in accordance with the requirements of Section 193 of the EP&A Regulations: ▪ Identify how ESD principles (as defined in section 193 of the EP&A Regulation) are incorporated in the design and ongoing operation of the development. ▪ Where relevant, provide an assessment of the development against the standards for non-residential development set out in Chapter 3 of State Environmental Planning Policy ▪ Precautionary principle: The precautionary principle has guided all ESD decisions and the striving towards elevated scores. The site selection, planning, materials, water, energy and ESD aspects were all influenced. ▪ Inter-generational equity: Similarly, the inter-generational equity principle has guided all ESD decisions and the striving towards elevated scores. The site selection, planning, materials, water, energy and ESD aspects were all influenced. ▪ Conservation of biological diversity and ecological integrity: The site selection, landscape design and ESD items adopted this principle. In particular a high percentage of locally indigenous plants (and natives) is proposed. ▪ Improved valuation, pricing and incentive mechanisms: Very high water, energy and NatHERS scores have been targeted to reduce running costs for residents. The fit out materials will also focus heavily on these principles. GECA, GreenTag and LCA tools will be used to reduce life cycle impacts.

SEARs Item	Assessment
(Sustainable Buildings) 2022.	<u>ESD Initiatives and Strategies</u> Key ESD strategies (for residential and non-residential) incorporated into the proposal include: ▪ Governance: The proposed development will implement strong governance practices to ensure engagement, transparency, and resilience, with a focus on detailed commissioning, climate adaptation, and effective waste management. Key strategies include metering and monitoring energy and water use, providing sustainability education, and developing a Construction Environmental Management Plan (CEMP). ▪ Indoor Environmental Quality: The proposed development will enhance Indoor Environmental Quality (IEQ) by focusing on indoor air quality, acoustic comfort, visual comfort, daylighting, and thermal comfort. Key strategies include using low-VOC materials, designing effective ventilation systems, incorporating acoustic insulation, maximising natural light and external views, and utilising performance glazing and shading to balance thermal comfort and energy efficiency. ▪ Energy: The proposed development aims to reduce energy consumption and greenhouse gas emissions through a well-designed building envelope, high-efficiency systems, and smart controls. Key strategies include meeting National Construction Code Section J requirements, using renewable energy sources like solar power, implementing efficient HVAC and lighting systems, and integrating passive design principles to minimise reliance on active systems. ▪ Transport: The proposed development will enhance transport sustainability by promoting active and public transport and reducing transport-related GHG emissions. Key initiatives include secured bicycle parking, shared bathroom facilities to encourage cycling, optimised pedestrian connectivity, and the provision for future electric car recharging stations. ▪ Water: The proposed development will minimise potable water consumption through the use of highly efficient fittings, fixtures, and appliances, as well as rainwater harvesting and reuse. Key strategies include water-efficient taps, showers, and toilets, rainwater storage for irrigation and toilet use, efficient irrigation systems, and the inclusion of drought-tolerant plants and green-roof gardens. ▪ Materials: The proposed development will minimise environmental impacts through careful material selection and waste management. Key strategies include using durable, locally sourced, and low-impact materials, designing for longevity and adaptability, and implementing a Waste Minimisation Plan to reduce, reuse, and recycle construction and operational waste. ▪ Land Use & Ecology: The project aims to enhance ecological value by reusing a previously developed site and restoring its ecological value through landscaping and the use of locally indigenous species. This approach will reduce water consumption, enhance biodiversity, and support the restoration of native flora and fauna. ▪ Emissions: The proposed development will minimise emissions to water, soil, and air during construction and operation. Key strategies include reducing peak stormwater discharge, minimising light pollution, mitigating heat island effects with lighter-coloured surfaces and green roofs, selecting refrigerants with zero Ozone Depletion Potential, and using low-reflectivity materials to prevent solar glare. ▪ Community: The proposed development will maximise community benefits by promoting active lifestyles, ensuring safe pedestrian and cyclist linkages, and facilitating social interaction. Key strategies include marketing sustainability practices, minimising glare and light pollution, promoting healthy living, and incorporating CPTED. <u>NatHERS and BASIX Assessment</u> The NatHERS Certificate appended to the ESD Report confirms the development achieves a 7.7 thermal performance star rating for its residential dwellings. This includes the following average heating and cooling loads: ▪ Average cooling load: 8.8MJ.sqm.year ▪ Average heating load: 16.1 MJ/sqm.year

19. Flood Risk

- A Flood Impact and Risk Assessment has been prepared by Taylor Thomson Whitting (**TTW**) to identify any flood risk in relation to the site and the proposed development (**Appendix OO**). The report provides an assessment on the flood conditions for the site and summarises the flood modelling results for pre and post development conditions in the 1% Annual Exceedance Probability (**AEP**) and Probable Maximum Flood (**PMF**) events. This is in accordance with the CoS's Interim Floodplain Management Policy (2014) with reference to the Woolloomooloo Flood Study and Floodplain Risk Management Study (2016).

A review of Elevation Information Systems (**ELVIS**) indicates that the site is located on sloping terrain, falling from 25m AHD in the southwest to 13m AHD in the northwest.

Figure 66: Existing drainage plans for the site.

The map displays the site boundary, existing building area, and modified gutter lines. Elevation contours are shown at 500mm intervals, ranging from 11m AHD to 27m AHD. The site is bounded by Forbes St, Dowling St, and William Street. A scale bar indicates 0, 10, and 20 meters.

Legend

- Site Boundary
- Existing Building Area (Excluded from Model)
- Modified Gutter Lines

Detailed Survey

- Elevation Contours (500mm Intervals)

Elevation (m AHD)

27

11

Flood modelling found that under existing conditions, the site is subject to minimal flooding in the 1% AEP event and is classified as low hazard (H1). An exception is noted at the northern extent of Dowling Street, where ponding depths reach 900mm due to a wall restricting flow into the adjacent railway corridor. This ponding has no direct impact on the subject site.

Post-development flood modelling found that the proposed works have negligible impacts to offsite flood conditions. It found that there was no increase in flood hazard, with flood depths localised and generally limited to road gutters in all scenarios. Despite proposed modifications to the public domain and changes to surface levels, there is no significant change in the building extent along the William Street and Dowling Street frontages. As a result, the development does not have any notable adverse impacts to neighbouring properties or the existing community, with the maximum increase in flood depths within the gutter of Dowling Street being 36mm. Flood emergency management strategies have been proposed including a shelter-in-place strategy for residents in the case of flash flooding. The proposed development has considerable space for all site users to shelter-in-place above the PMF level. Pre-emptive closer of retail and commercial uses on the site is recommended, if possible, to reduce risk to staff. Further details including emergency response procedures for residents and staff can be outlined in a Flood Emergency Response Plan for the site.

7. Justification of the Project

This section of the report provides a comprehensive evaluation of the project having regard to its economic, environmental and social impacts, including the principles of ecologically sustainable development.

It assesses the potential benefits and impacts of the proposed development, considering the interaction between the findings in the detailed assessments and the compliance of the proposal within the relevant controls and policies.

7.1. Project Design

The proposed development has been carefully designed to minimise and appropriately manage any potential impacts. Its location adjacent to Kings Cross Train Station provides an opportunity to accommodate additional height and density, consistent with broader planning objectives to increase housing supply in Sydney, including the delivery of affordable housing.

The built form generally reflects 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, ensuring no unreasonable impacts occur in relation to overshadowing, views, privacy, visual character, or wind.

By enabling greater density, the proposal supports the provision of additional affordable rental housing, delivering tangible public benefits. These include new housing opportunities in a highly accessible location, well connected to transport and close to employment nodes in the health and education sectors. At ground level, the design enhances community benefit by introducing publicly accessible pedestrian connections through a vibrant and active streetscape, further strengthening accessibility and connectivity.

7.2. Strategic Planning Consistency

This EIS has demonstrated that the proposal is 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. 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 floor to activate the ground plane and provide a balanced mix of land uses, as envisaged by the CoS LSPS for the Macleay Street and Woolloomooloo Village.

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

7.3. Statutory Planning Consistency

The relevant State and local environmental planning instruments are listed in **Section 4** and assessed in **Appendix C**. The assessment concludes that the proposal complies with the relevant provisions within the relevant instruments as summarised in below:

- The proposed development has been assessed and designed in respect to the relevant objects of the EP&A Act as defined in Section 1.3 the Act and addressed in **Appendix C**.
- This EIS has been prepared in accordance with the SEARs as required by Schedule 2 of the EP&A Regulations.
- Consideration is given to the relevant matters for consideration as required under the BC Act and the SSD is supported by a BDAR Waiver accordingly.
- This SSDA pathway has been undertaken in accordance with the Planning Systems SEPP as the proposed development is classified as SSD.
- 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 proposed development has been assessed in accordance with the Resilience & Hazards SEPP and complies with the relevant clauses.

7.4. Community Views

Community and stakeholder engagement has been a key part of preparing the SSDA. The details of this engagement are outlined in the Engagement Outcomes Report (at **Appendix Q**). This Report provides a comprehensive overview of the issues raised by community stakeholders and explains how these concerns are incorporated into the proposed development. A summary of this engagement is provided in **Section 5**.

In accordance with the EP&A Regulation, this EIS will be formally exhibited to the public after a review by DPHI for adequacy. Any issues raised by community stakeholders during the public exhibition will be addressed in a Response to Submissions (**RTS**) after the exhibition period concludes.

7.5. Environmental Impacts

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 assessed in **Section 6** of this EIS.

It has been demonstrated that for each of the likely impacts identified in the assessment of the key issues, the impact will either be positive or can be appropriately mitigated. **Appendix D** provides a summary of the 'mitigation measures' which can form appropriate conditions of development consent.

7.6. Suitability of the Site

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

- The Proposal is consistent with the MU1 (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.

7.7. Public Interest

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

- The proposal delivers 60 affordable apartments which equates to 26% 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 proposal will have a positive economic impact through the delivery of employment generating floor space for 440 jobs during the construction phase and 1,028 ongoing jobs during the operational phase of the development.
- 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.

8. Conclusion

This EIS has been prepared to assess the natural environment, built environment, and social and economic impacts of the project. The EIS addresses the issues outlined in the SEARs and complies with Sections 190 and 192 of the EP&A Regulation and the considerations under Section 4.15 of the EP&A Act.

Considering environmental, economic and social factors, including the principals of ecologically sustainable development, the project is justified for the following reasons:

- The proposed development is consistent with the vision and intent for the site, being the creation of a vibrant mixed-use precinct that transforms this underutilised site.
- The urban design outcome is broadly consistent with that established through the lengthy planning history, including the key design elements that awarded the scheme the winner of the design excellence competition. Those fundamental elements have been retained and enhanced through the reiterative design process, with the focus on massaging the building height to ensure an appropriate response to height and massing.
- The proposed development skilfully places the height and bulk of the building in a location that minimises the degree of external impacts to the greatest extent possible, whilst also delivering and addressing the need for affordable housing in a strategic inner-city location.
- The proposed development features a high standard of architectural, urban and landscape design, making a significant high-quality contribution to the built form of Woolloomooloo.
- The proposed development enables the delivery of 227 high quality residential apartments, including 60 affordable apartments (26% the overall yield). These apartments will contribute to addressing the critical under supply for new housing in NSW.
- The proposal is expected to generate a substantial number of direct and indirect construction jobs, along with additional operational jobs, delivering broader social and economic benefits to the region.
- The proposal enhances the pedestrian environment, creating a safe and welcoming public domain that adheres to CPTED principals.
- The Traffic and parking impacts associated with the proposed development represent a significant decline in weekday traffic movements compared to the existing car rental use which is a positive and alleviates any significant increased pressure on the local road network.
- The proposed development is suitable for the site and serves public interest.

Overall, the proposed development is suitable for the site and is recommended for approval, subject to appropriate conditions of consent and the implementation of the recommended mitigation measures.

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