

17 March 2026

John Fitzgerald
William Street Nominee Pty Ltd
Suite 4, level 8, 14 Martin Place
Sydney, NSW 2000

Dear John,

Design Integrity Panel | Session 3 | 164-172 and 174-194 William Street, Woolloomooloo

Design Integrity Process: Session 3

Introduction

This letter has been prepared by Urbis Ltd on behalf of the Design Integrity Panel (**DIP**), in relation to the Design Integrity Process for the State Significant Development Application (**SSDA**) at 164-172 and 174-194 William Street, Woolloomooloo (SSD-80211463).

The objective of this process is to ensure that design integrity is continued as the project “transitions” from the original Competition Scheme to an SSDA that utilises the infill affordable housing bonus provisions of the State Environmental Planning Policy (Housing) 2021 (**Housing SEPP**).

The DIP comprises of three (3) Panel members. In accordance with the endorsed Terms of Reference (**TOR**), this includes two (2) members of the Competition Jury and a member of the Government Architect NSW. The members of the DIP are outlined in **Table 1** below.

Table 1 DIP Members

Panel Member	Role / Position
Paulo Macchia FRAIA (Chair)	Director Design Governance – Government Architect NSW
Chi Melhem (Proponent Nominee)	Director – EMBECE
Kerry Clare LFRAIA (City of Sydney Council Nominee)	Director – Clare Design

The members of the Design Team are outlined in **Table 2** below:

Table 2 Design Team

Design Team	Key representative
FJC Studio	Johnathan Redman
Studio Bright	Melissa Bright
Tribe Studio	Hannah Tribe

The first DIP session took place on 30 April 2025 and was held online. Attendance of this meeting included members of the Design Team and William Street Nominee Pty Ltd (**the proponent**). Key stakeholders were also invited to attend the DIP session (including representatives from CoS and the Department of Planning, Housing and Infrastructure (**DPHI**)). Urbis as the DIP manager were also in attendance.

In response to the initial feedback, the proponent provided additional information to the DIP via email on 2 June 2025, in relation to built form options and affordable housing. Following the submission of this, the DIP requested a meeting to discuss these two key matters, so that a view could be formed in relation to the progression of the full design. A meeting was held with Urbis and the DIP (Kerry Clare and Chi Melham, noting Rory Toomey was an apology) on 11 June 2025. At that meeting, the DIP provided support for the Design Team to progress with 'Option 6' however reiterated that adjustments were required to the allocation of affordable housing units so that they received a greater percentage of solar access.

A second formal DIP session was held online on 23 July 2025. This meeting was attended by the DIP members, the Design Team, Urbis and the proponent. This meeting did not include representatives from the CoS or DPHI.

The DIP reiterated that the design team had successfully managed to maintain and to preserve the key elements of the winning competition scheme whilst adopting the 30% uplift on a challenging site. Moreover, it was acknowledged that the uplift has been achieved by carefully managing additional external amenity impacts and demonstrated a skilful design response.

The DIP raised concerns around thermal comfort of the upper-level apartments and requested that the affordable housing units receive a minimum 60% solar access. The DIP noted that the design was capable of achieving Design Excellence subject to the resolution of these items.

The SSDA was formally lodged in October 2025 and exhibited between 30 October 2025 and 13 November 2025. Following the public exhibition of the project, the DPHI requested that the proponent reconvene the DIP and present a response to all design issues raised during exhibition.

A third DIP session was held online on 11 March 2026. This meeting was attended by the DIP members, the Design Team, Urbis and the proponent. Representatives of the Government Architect and CoS were also in attendance as observers.

Design Integrity Panel Focus Areas

The following table summarises the DIP's comments on the scheme as presented by the Design Team during the DIP Meeting No.3 on 11 March 2026.

All Panel comments and feedback reflect the position of the DIP.

Table 3 DIP Comments

Focus Area	DIP Comment
Building Massing	<p>The Panel reiterated that the built form and massing demonstrate a clever and considered response to the site context. The surrounding context includes a varied topography from which tall tower forms emerge. The panel expressed that the redistribution of height into the William Street East tower was contextually appropriate and consistent with tall tower forms in the surrounding context, and that the proposal continues to present a skilful design response in addressing and minimising external amenity impacts.</p> <p>Opportunities should be explored on the Forbes Street façade at street level to enhance visual interest and amenity for the public domain.</p>
William Street Building Façade	<p>In relation to the William Street building, the Panel notes that there are a number of facade articulations including blades and curves that are no longer necessary given the changed internal planning. The façade design appears to limit the degree of openness to windows and balconies and detracts from the internal amenity of the apartments. The simplification of the facade should assist in eliminating awkward triangular rooms</p> <p>Further, it appears that elements of the façade were originally designed to mitigate privacy impacts resulting from the building separation between the William Street building and the Dowling Street and Forbes Street buildings. However, the two northern buildings have been designed in a manner that already limits potential privacy impacts. Therefore, it is not necessary to introduce additional privacy measures to the William Street north façade, particularly where it reduces the internal amenity of those apartments.</p> <p>The Panel recommends that the blades and extent of solid façade be reduced, where possible to increase amenity. For example, the splayed balcony panel at apartment 502W could be repositioned to increase daylight to the bedroom of apartment 503W. Similarly, the façade blades for apartments 501E – 503E could also be refined.</p> <p>These minor facade refinements would improve internal amenity and outlook for the north-facing apartments.</p>
Apartment layout and amenity	<p>The Panel identified widespread issues in the William Street building apartment layouts, including awkward room shapes, long corridors and compromised living spaces. These outcomes were considered to be driven by the angled blades on the northern facade, which result in poorly lit living and kitchen areas that are difficult to furnish.</p>

The Panel noted that the angled blades on the façade were likely introduced as a design response to privacy concerns relating to the Forbes Street and Dowling Street buildings to the north which, as described above, is unnecessary.

The Panel recommends that the design team refine the apartment layouts to prioritise clear, functional planning and room proportions to ensure all habitable spaces have appropriate light, ventilation and usability.

Similarly, the angled balconies introduced to the Dowling Street building were seen to result in reduced amenity for the units when compared to the previous scheme. The angled glazing line creates awkward balcony space that would be difficult to furnish and challenging to use.

The Panel recommends that the Dowling Street building re-instate a more orthogonal balcony and glazing line, similar to the original design, to allow for a 6-seater table on the balcony and more usable internal spaces. The Panel notes that this could be achieved while maintaining the well-circulated internal layout which represents an improvement since the last DIP meeting.

The design should ensure safe access is provided for the maintenance of all rooftop planting.

Affordable Housing Amenity

Amenity of the Affordable Housing Lift Lobby

The Panel supports the consolidation of the affordable housing apartments into a single stack, with the separate lift lobby. The Panel notes that this assists in managing the affordable apartments from an operational perspective. However, the affordable housing entry lobby accessed from the north-south through-site link was seen to lack appropriate presence and dignity. The entry is characterised by a narrow ramp, poor visibility and minimal foyer space, resulting in an arrival experience that is not equitable when compared with the market unit lobby entries. The entry should be relocated to provide direct access from the William Street frontage.

Cross-ventilation and Solar Amenity to the Affordable Housing Units

The Panel acknowledges that the design team has increased solar access to the affordable housing apartments from 58% to 67%. However, in doing so, the Panel raised concerns that the cross-ventilation performance of these apartments has been significantly reduced.

The Panel suggested that the design team further investigate the distribution of the affordable apartments stacks which may present opportunities to increase the cross-ventilation and solar compliance to these apartments.

The Panel highlighted that the team should investigate thermal modelling for the façade to reveal the cross-ventilation capability of the William Street West building. The wind report indicates that there are strong westerly winds, particularly at the intersection of William Street and Forbes Street. With refinements to the façade, as discussed separately, there may be further opportunities to increase the cross-ventilation to these apartments.

Access to Communal Spaces

The Panel notes that as a result of the replanning for the affordable housing apartments, these residents will not have direct access to the rooftop communal open space.

The applicant confirmed that the affordable housing residents will not have access to this rooftop space, consistent with the long-term management and operational arrangements, including retaining the units on separate title. All residents will have access to the broader communal offering at the ground level, including the central and northern park as well as all indoor communal facilities including the gym and flexi room.

Access to the DDA lift, escalator and central core in the William Street Building.

The Applicant confirmed that 24-hour access will be provided across the site, including to the DDA lift and escalators within the William Street Building.

While the Panel is supportive of the site being accessible 24/7, the current design raises a number of CPTED concerns.

The DDA lift is located behind retail tenancy 03 and is not immediately visible from the central park. Access to the retail WC facilities is located behind retail tenancy 02 and is configured as a “dog-leg” walkway. Given that this area is accessible 24/7, there are concerns that people could conceal themselves within the dog-leg walkway, presenting a potential safety risk for those accessing the DDA lift.

Access to the central core from the park level has a convoluted path. Explore opportunities for direct access with a clear visual connection from the public domain to these lifts.

The Panel requests that the design of this area be revisited to increase visibility of the DDA lift, central core and public amenities to reduce potential safety risks in accordance with CPTED principles.

Thermal comfort for upper levels of William Street buildings

The thermal comfort of the south-facing penthouse apartments in the William Street buildings continues to remain an issue for the Panel. The ability of these apartments to cool down during summer, given the extent of glazing was identified as a key issue. The Panel urges the design team to explore options that improve thermal comfort within the bedroom and living spaces to avoid these apartments becoming ‘hot boxes.’ There remains a concern that, due to their design, these apartments will be fully reliant on artificial cooling

The Panel reiterates the previous comments in relation to these apartments and recommends that the façade design be refined to improve thermal comfort and overall building performance. The high exposure to afternoon summer sun needs more consideration. The Panel considers that there are design solutions that could improve performance and be easier for apartment occupants to operate, providing them with greater control over matters such as thermal comfort, energy use and cleaning.

Panel Responses

The DIP reiterated that the design team have been successful in delivering a massing outcome that responds to its context and has successfully managed balanced the 30% uplift while mitigating amenity impacts external to the site. The Panel acknowledged that key elements of the winning competition scheme have been retained whilst responding to comments from the previous DIP meeting, as well as comments raised during the public exhibition of the project.

The Panel was supportive of the design's progression and the potentially positive contribution it will make to the local area, noting its strong design response to contextual amenity considerations and its significant contribution to publicly accessible open space. The Panel expressed support for the proposed development's ability to achieve Design Excellence subject to further consideration and design development in response to the items outlined in **Table 3** above. The Panel requested that these be closed out prior to the formal lodgement of the Response to Submissions.

The Panel does not require a further review of the design and is satisfied, subject to the recommended design amendments being incorporated into the proposal.

Panel

The DIP Chair confirms that this letter is an accurate record of the DIP feedback and that the DIP endorses the observations and clarifications by consensus.

Table 4 Design Integrity Panel (DIP) Endorsement

Name	Signature	Date
Paulo Macchia		17/03/2026

Yours sincerely,



Sophy Purton
 Director
 +61 2 8233 9970
 spurton@urbis.com.au