

Corey Johnston
Apartment 2402
1 Kings Cross Road
Darlinghurst NSW 2010

23 June 2026

Director, Social and Infrastructure Assessments
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Dear Sir/Madam,

**Re: Objection to SSD-80211463 – Mixed Use Development with In-fill
Affordable Housing, 164–194 William Street, Woolloomooloo**

I am the owner and resident of Apartment 2402, 1 Kings Cross Road, Darlinghurst.

I wish to formally object to the proposed development at 164–194 William Street, Woolloomooloo.

While I support the provision of additional housing and recognise the importance of affordable housing within Sydney, I do not believe the current proposal appropriately balances those objectives against the significant impacts that would be imposed on existing residents and the surrounding urban environment.

My concerns are outlined below.

1. Excessive Height and Scale

The proposed development represents a substantial increase in height, bulk and floor space when compared with the scale traditionally envisaged for this site.

Publicly available planning documentation indicates that the proposal has evolved from a significantly smaller scheme into a complex up to approximately 18 storeys in height. The resulting increase in visual bulk is substantial and creates a dominant built form at a highly visible gateway location between the CBD, Darlinghurst and Woolloomooloo.

The proposal is no longer a modest urban renewal project. It has become a major high-rise development that is out of proportion with the surrounding built environment and inconsistent with the established character of the locality.

2. Significant Increase Above Previously Approved Development

A key concern is the substantial increase in height and bulk sought under the current proposal when compared with the development previously approved for the site.

The current proposal represents a substantial increase in height and bulk when compared with earlier redevelopment concepts and approvals associated with the site. The proposal seeks buildings of up to approximately 18 storeys and 61 metres in height, creating a materially different visual outcome and significantly greater impacts on surrounding residents

Importantly, residents who purchased or occupied homes in the vicinity have done so in a planning context where a significantly lower built form had been contemplated for this site. While redevelopment itself may be anticipated, the scale of the current proposal extends well beyond what was previously approved and creates materially different impacts on surrounding properties.

The Department should carefully consider whether the additional height and floor space sought are genuinely necessary to achieve the project's objectives. The public benefit arising from additional affordable housing must be weighed against the corresponding impacts on existing residents, including loss of views, reduced outlook, increased visual bulk and changes to the established character of the locality.

In my view, the current proposal exceeds what is necessary to achieve a reasonable redevelopment outcome and imposes impacts that are disproportionate to the additional benefit delivered by the increased height.

3. Loss of Views and Residential Amenity

My apartment currently enjoys significant outlook across William Street, Woolloomooloo, the Domain precinct and towards the Sydney CBD skyline.

The proposed towers will occupy a prominent ridgeline position on William Street and will materially interfere with the existing visual outlook available from my apartment.

Although views are not guaranteed under NSW planning law, the Land and Environment Court's decision in *Tenacity Consulting Pty Ltd v Warringah Council* established that view impacts are a legitimate planning consideration and should be assessed having regard to the value of the affected views, the severity of the impact and whether a more skilful design could achieve the same planning objectives with less impact.

Subsequent decisions have reinforced the principle that significant view loss may be unreasonable where alternative design solutions are available.

In this case, the loss of visual amenity is not a consequence of reasonable urban infill. It results from a proposal that has expanded significantly beyond the scale previously contemplated for the site. The existence of a previously approved lower-scale scheme demonstrates that meaningful redevelopment can occur without the level of visual impact generated by the current proposal.

The Environmental Impact Statement itself acknowledges that the site occupies a sensitive visual catchment with visibility to major Sydney landmarks and view corridors. The importance of the site's visual location should therefore weigh heavily in the assessment of the proposal.

4. Visual Intrusion and Skyline Impact

The site occupies a prominent elevated position that is visible from many surrounding residential buildings.

The proposed building heights will introduce an intrusive wall of development into the outlook currently enjoyed by residents in Darlinghurst, Kings Cross and Woolloomooloo.

From higher-level apartments such as mine, the issue is not simply loss of a distant landmark view. The proposal introduces substantial built form into the foreground and middle-distance outlook, fundamentally changing the visual character of the view.

The cumulative effect of multiple towers of this scale will create a visually dominant presence that is inconsistent with the existing urban grain and skyline character of the area.

5. Departure from Planning Controls

I am concerned that the proposal substantially exceeds the planning framework that has historically applied to the site.

The development seeks to rely upon affordable housing incentives to justify significant increases in height and floor space.

While affordable housing is an important public objective, such incentives should not be treated as a mechanism to override fundamental urban design principles or permit development outcomes that impose unreasonable impacts on surrounding residents.

The scale of the uplift sought appears disproportionate to the public benefit delivered.

6. Concentration of Affordable Housing and Equitable Distribution of Growth

I acknowledge and support the objective of increasing affordable housing supply across Sydney.

However, Woolloomooloo and the surrounding inner-city precincts already contain a significant proportion of social, community and affordable housing relative to many other parts of metropolitan Sydney. The Department should consider whether the continued concentration of affordable housing and associated density uplift within a limited geographic area represents the most appropriate planning outcome.

The provision of affordable housing is an important public benefit, but it should not automatically justify substantial increases in building height and bulk where those increases result in significant impacts on surrounding residents and the urban environment.

A more balanced approach would seek to distribute housing growth and affordable housing opportunities across a broader range of locations while ensuring that redevelopment proposals remain consistent with sound urban design principles and the character of their surrounding neighbourhoods.

The Department should therefore carefully consider whether the scale of uplift sought for this site is necessary to achieve affordable housing objectives, or whether a lower-scale development could deliver a meaningful affordable housing outcome while reducing impacts on neighbouring residents and the public realm.

7. Insufficient Transition to Surrounding Residential Areas

The proposal does not provide an adequate transition between the scale of the development and the surrounding residential neighbourhoods.

A development of this height and massing creates an abrupt change in scale that is inconsistent with good urban design principles.

A more appropriate outcome would involve lower overall building heights, increased setbacks and a reduction in visual bulk, particularly in those portions of the site most visible from surrounding residential areas.

8. Precedent Implications and Community Concern

Approval of a development of this scale would establish an undesirable precedent for future applications along William Street and adjoining precincts.

The cumulative effect of similar developments could significantly alter the character of the eastern gateway to the city and progressively erode the amenity of existing residential communities.

I note that a substantial number of nearby residents have lodged objections to the proposal, raising consistent concerns regarding excessive height, visual bulk, view impacts, privacy, overshadowing and neighbourhood character. The volume and consistency of these concerns indicate that the proposal's impacts extend beyond individual properties and reflect broader community concern regarding the scale of the development.

The widespread nature of these objections suggests that the issues raised are not isolated to a small number of directly affected properties, but rather reflect concerns about the broader planning and urban design implications of the proposal. This should weigh heavily in the Department's assessment of whether the current scale of development is appropriate for this location.

9. Specific Impact on Apartment 2402, 1 Kings Cross Road

As the owner and resident of Apartment 2402 at 1 Kings Cross Road, Darlinghurst, I am directly affected by the proposed development.

My apartment is located on Level 24 and currently enjoys a substantial outlook across William Street, Woolloomooloo, the Domain precinct, St Mary's Cathedral and the Sydney CBD skyline. This outlook forms a significant component of the residential amenity of the apartment.

Attached photographs demonstrate the existing visual character of the outlook, which currently provides an open and expansive view corridor extending from William Street towards the Domain precinct and the Sydney CBD skyline.

While I acknowledge that redevelopment of the subject site may occur, the scale of the current proposal would introduce a substantial new built form into the foreground and middle-distance view corridor currently available from my apartment.

The impact is not limited to the loss of a specific landmark view. Rather, the proposal would alter the visual openness of the outlook, introduce additional building bulk into a currently open ridgeline location and diminish the sense of space presently experienced from the apartment.

The attached photograph demonstrates that Apartment 2402 enjoys a broad outlook encompassing William Street, Woolloomooloo, the Domain precinct, St Mary's Cathedral and the Sydney CBD skyline. While the proposal may not obstruct all landmark views, it would introduce substantial additional building bulk into the currently open middle-ground view corridor and materially diminish the sense of openness and visual amenity presently enjoyed from the apartment.

Given the elevated position of both the site and my apartment, the proposed towers would become a prominent visual element within the outlook and would materially change the character of the view currently enjoyed.

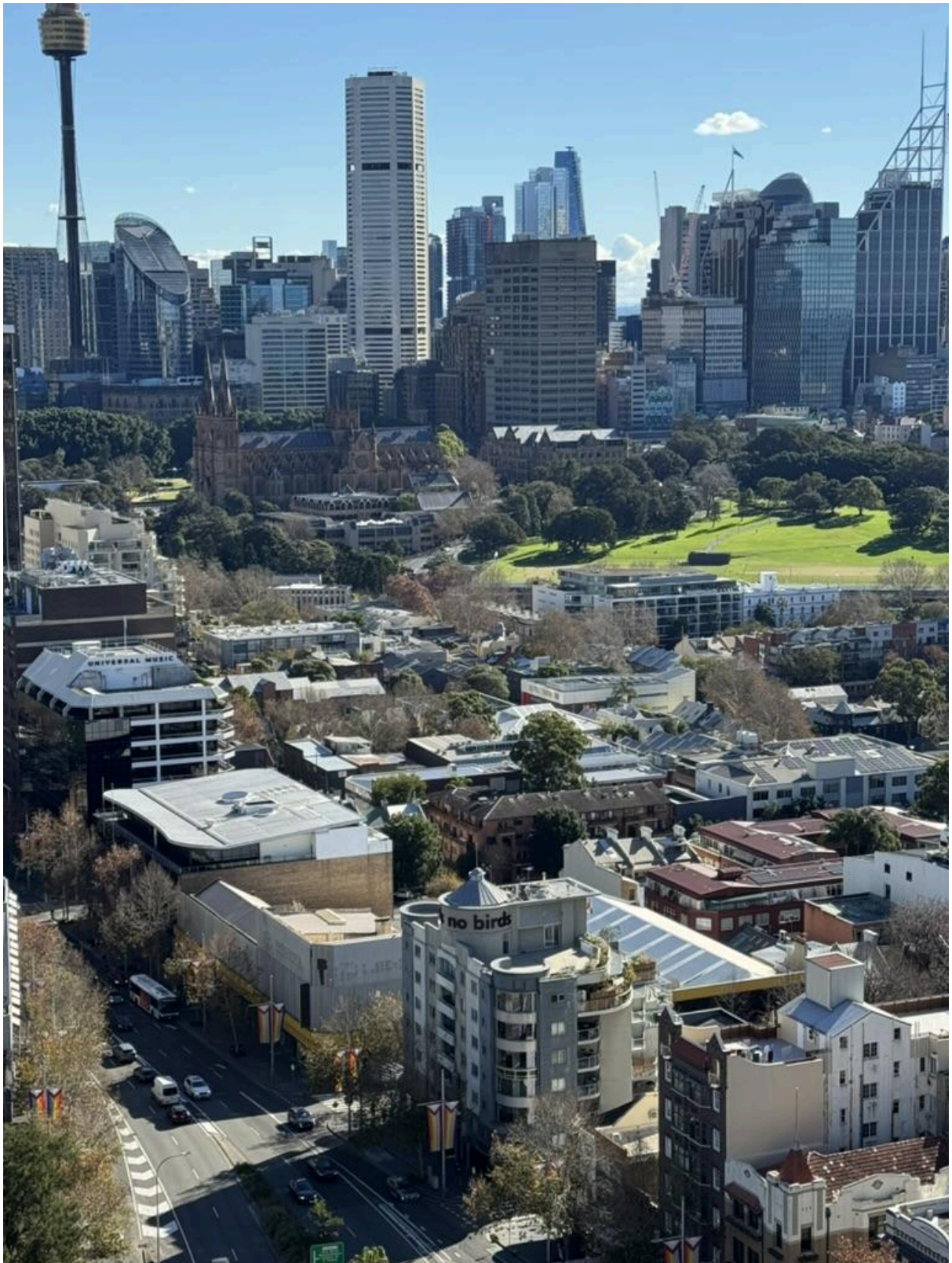
I request that the Department undertake a detailed assessment of view impacts from surrounding residential properties, including Apartment 2402 at 1 Kings Cross Road, and consider whether a reduced building height could achieve the project's objectives while significantly reducing impacts on neighbouring residents.

I also note that a number of publicly available visual impact assessments appear to focus on lower-level viewpoints. Given the elevated position of my apartment on Level 24, I request that the Department carefully consider impacts on higher-level residential apartments, where the introduction of substantial new building bulk may be experienced differently and more prominently than from lower-level vantage points.

10. Attachment

Attachment 1 – Existing Outlook from Apartment 2402, 1 Kings Cross Road

Photograph showing the existing outlook across William Street, Woolloomooloo, the Domain precinct, St Mary's Cathedral and the Sydney CBD skyline.



Conclusion

I respectfully request that the Department require substantial amendments to the application before any approval is considered.

Should the Department determine that redevelopment of the site is appropriate, I request that any approval be subject to substantial reductions in building height, floor space and visual bulk so as to better protect existing residential amenity, views, outlook and the character of the surrounding area.

At a minimum, I request that the Department require the height of the proposed towers to be reduced to a scale more consistent with the previously approved development for the site, thereby reducing the resulting impacts on surrounding residents and the broader urban environment.

The current proposal represents a significant departure from the scale previously approved for the site and would have a materially greater impact on surrounding residents, including those in nearby high-density residential developments such as 1 Kings Cross Road. A more moderate development outcome would allow the delivery of additional housing while achieving a more appropriate balance between public benefit and the protection of existing residential amenity.

I ask that this submission be taken into consideration during assessment of SSD-80211463.

Yours faithfully,

Corey Johnston