

H Melnick
The Horizon, 184 Forbes Street
Darlinghurst NSW 2010

24 June 2026

Department of Planning, Housing and Infrastructure NSW (DPHI)
Attention: Ms Michelle Niles, Specialist Planner, Planning Assessments
SUBMISSION OF OBJECTION

Application: Mixed-use development with in-fill affordable housing (Amended SSDA Documents)

Location: 164-194 William Street, Woolloomooloo

Authority: Department of Planning, Housing and Infrastructure NSW

Dear Ms Niles,

I am writing to express my opposition to the amended State Significant Development Application (SSDA) for 164-194 William Street, Woolloomooloo.

As a local resident, I am alarmed by the extent to which this proposal attempts to bypass critical development standards. The massive scale variations will severely compromise our local infrastructure, environmental safety, and community amenity. I completely align myself with the objections raised in the collective submission titled "**Submission_Amendments_164-194 William Street Woolloomooloo_23 June 2026.pdf**". I urge the Department to reject this application based on the serious concerns detailed below.

1. Unjustified Scale Uplift and Violation of Planning Limits

The applicant is seeking a massive, un-strategic departure from established statutory planning limits, including height breaches that exceed legislated limits by up to 50%.

- **Lack of Strategic Vision:** This scale variation is not backed by a formal Planning Proposal or a robust regional review. It introduces an over-scaled, intrusive precedent that disrupts the historical transition of the Woolloomooloo ridge.
- **Artificial Building Mass:** The inclusion of prominent 2-to-3-storey roof features fronting William Street adds substantial unnecessary height and bulk, exacerbating the negative visual impact on the surrounding streetscape.

2. Failure to Provide Equitable View Sharing

The wide and bulky building footprint threatens to permanently block globally recognized, iconic harbour and city views enjoyed by hundreds of local residents.

- **Misleading Impact Assessment:** The applicant's Visual Impact Assessment (VIA), peer-reviewed by Urbis, is factually flawed and downplays panoramic views as mere "oblique side boundary" angles. The consultants failed to perform internal inspections, relying instead on generic drone footage.
- **Rejection of Slender Design Alternatives:** This design explicitly ignores the 'Tenacity' equity principles. While previous concept applications with the City of Sydney required the building form to be tapered to protect view corridors, this current SSDA pushes a wide, high form that refuses to share views equitably.

3. Substandard Amenity and Reduction of Affordable Housing

The applicant relies heavily on the provision of affordable housing to justify its non-compliant building scale, yet the social and architectural execution is highly deficient:

- **Reduced Social Benefit:** The number of affordable units has actually decreased from 60 down to 58, which is the absolute bare minimum (15% of floor area) for a short-term 15-year period.
- **Compromised Living Conditions:** The affordable units have lower solar access (66%) than the 70% threshold strongly recommended by the City of Sydney. They are heavily isolated with separate entries and face a high-noise environment along William Street. This design creates a visible social divide that compromises the dignity of future tenants.
- **Historical Disregard:** This project ignores the 51-year-old Woolloomooloo Tripartite Agreement, which historically limited high-rise growth to preserve local vistas and protect true, permanent social housing stock.

4. High-Hazard Flood Risks and Structural Concerns

The surrounding streets are subject to extreme, high-hazard flooding during Probable Maximum Flood (PMF) events, yet critical safety protections have been omitted:

- **Deficient Entry Protection:** The applicant's consultant has failed to design the industry-standard 1% AEP plus 500mm freeboard for the basement entryways. In a severe flood event, this oversight puts occupants at risk of being trapped and guarantees catastrophic property damage.
- **Unsound Groundwater Management:** The proposal utilizes a drained basement that will pump massive, highly variable amounts of groundwater directly into Council's aging, over-capacity stormwater system.
- **Harbour Contamination Risks:** Rather than producing an updated assessment, the applicant "recycled" an old contamination report. Pumping untreated groundwater through a site with a known history of contamination risks flushing hazardous pollutants into Sydney Harbour, which sits just 600m away. The

Department must require a fully tanked basement to avoid this environmental hazard.

5. Geotechnical and Traffic Pressures

- **Cross City Tunnel Proximity:** The planned 12m to 14.8m deep excavation sits directly over the Cross City Tunnel (located at a 20m depth). Excavating into porous soil on a steep 20% gradient introduces unmitigated risks to site stability and critical utility lines along William Street.
- **Traffic Gridlock:** Forcing high-density private vehicle access directly onto a major, heavily congested classified road like William Street will significantly worsen local traffic delays.

Conclusion

This application fails the test of public interest. It relies on biased, flawed impact reporting, delivers substandard affordable housing, and introduces extreme environmental and structural risks to the Woolloomooloo catchment.

Because this project fails to comply with the SSDA SEARs guidelines or provide a genuinely superior environmental planning outcome, I request that the Department **reject** this proposal in its entirety.

Thank you for your careful consideration of my objection.

Yours sincerely,
H Melnick