

**M Choong**

**184 Forbes Street**

**Darlinghurst**

**NSW 2010**

[Centruminvest@gmail.com](mailto:Centruminvest@gmail.com)

**5/11/25**

**To:**

The Secretary  
NSW Planning Commission  
GPO Box 39  
Sydney NSW 2001

**Subject:** Submission – Objection to Proposed Development at 164–194 William Street, Woolloomooloo

Dear Commissioners,

I am writing as a local resident who is deeply concerned about the proposed development at 164–194 William Street, Woolloomooloo. Having reviewed the Environmental Impact Statement and associated documents, I believe the proposal is inappropriate for the site in its current form. It raises major concerns around height, amenity, public access, and genuine community benefit.

---

## **1. Clause 4.6 Variation – Height and Density**

The development's proposed height and floor space ratio significantly exceed what is permitted under the *Sydney Local Environmental Plan 2012*, even after applying the 30% bonus allowed under the *Housing SEPP*.

The developer is seeking to justify this through a **Clause 4.6 variation**, yet the **Visual Impact Assessment (VIA)** does not adequately demonstrate that the increased bulk and height are compatible with surrounding buildings or view corridors. In particular, the VIA does not properly assess view loss from mid-level apartments in the Horizon building.

Without a comprehensive and transparent assessment of these impacts, the Clause 4.6 request cannot be considered well-founded.

---

## **2. The So-Called “Public” Park**

While presented as a community benefit, the proposed park is in fact **privately owned**. This raises obvious concerns about long-term access, safety, and

accountability.

Moreover, the developer appears to have effectively **reclaimed the park's area into the total floor space** by building taller. This manoeuvre undermines the integrity of the design and calls into question whether any true public open space benefit exists.

---

### 3. Lack of Genuine Community Consultation

The consultation process has been extremely limited. Residents were invited to only one online presentation, with no opportunity for proper dialogue or follow-up.

The *Social Impact Assessment* acknowledges that many questions were raised but gives no evidence that these were addressed or that community input influenced the design in any meaningful way.

This is not the level of consultation expected for a project of such prominence and scale.

---

### 4. Wind, Comfort and Pedestrian Use

According to the *Pedestrian Wind Assessment*, William Street already experiences strong winds, and the proposed building will do little to improve conditions. The areas intended for seating or outdoor activity would remain uncomfortable for much of the year.

The assumption that people will casually stroll, shop, or dine in this area is inconsistent with the findings of the developer's own wind analysis.

---

### 5. Traffic and Parking

Traffic and parking arrangements are poorly resolved. The *Transport Impact Assessment* includes references to vehicle movements that are not actually permitted (such as a right turn into William Street).

The lack of dedicated retail visitor parking will inevitably push cars into nearby residential streets, adding to congestion and reducing safety for pedestrians and cyclists.

---

### 6. Misleading "Design Excellence" References

Repeated references to a "winning design excellence process" are misleading. The current DA is **not a continuation of the previously approved Concept DA**.

Suggesting that it is may confuse the community and decision-makers and unfairly imply that the design has already been endorsed through prior approvals.

---

## 7. Affordable Housing Claims

The proposal refers to the inclusion of affordable housing but provides **no details on rent levels, management, or eligibility**. There is no indication of how affordability will be maintained or who will bear ongoing costs such as strata fees.

Without these assurances, the community cannot be confident that the promised affordable housing will ever materialise as described.

---

## 8. Questionable Social Impact Statements

The *Social Impact Assessment* claims the project could “deter crime” in the local area but offers **no evidence or rationale** for this assertion. Given existing social issues in Woolloomooloo, such claims should be substantiated or omitted.

---

## Conclusion

In my view, the proposal:

- Relies on an **unjustified Clause 4.6 variation**,
- Offers **illusory or uncertain public benefits**,
- Will **worsen local traffic and wind conditions**, and
- Has been advanced **without genuine community consultation**.

For these reasons, I respectfully urge the Commission to **refuse the proposal in its current form** and to require a full, transparent reassessment of its visual, social, and environmental impacts.

Thank you for considering my submission.

Yours faithfully,

M Choong