

Subject: Objection to Development Application at 164–194 William Street, Woolloomooloo NSW 2011 (SSD-80211463)]

Dear Sir/Madam,

I am a neighbour of the site proposed for redevelopment under the above application. I wish to lodge a formal objection to the proposal on the grounds of excessive height, visual impact, inadequate community consultation, and several unresolved amenity and planning concerns.

While I support sensible development in our area, this proposal goes well beyond the planning controls established in the *Sydney Local Environmental Plan 2012 (SLEP 2012)* and the *State Environmental Planning Policy (Housing) 2021*. The application seeks to exceed the allowable height limits, even after applying the 30% affordable housing bonus, and relies on a **Clause 4.6 variation** to justify these exceedances.

My specific concerns are as follows:

1. Non-Compliant Building Height and Visual Impact

The proposed tower would reach 35.8 metres (north) and 66.3 metres (south), substantially exceeding both the LEP and Housing SEPP limits. The *Visual Impact Assessment (VIA)* provided by the developer does not adequately evaluate the view loss or overshadowing effects for surrounding buildings.

The view loss/impact associated with the non-compliant height has not demonstrated that design has resulted in the view loss being less than would arise if the height was otherwise compliant.

Only one higher-level viewpoint (Viewpoint 33) was used, and it does not capture the most non-compliant section of the proposed building. Mid-level apartments have not been considered at all.

This omission means the VIA cannot be relied upon to justify the Clause 4.6 variation, as the variation request is not “well-founded,” depending on an incomplete assessment.

2. Privately Owned “Public” Park

The application presents a 1,356 sqm “publicly accessible park” as a community benefit. However, it appears that the developer has included this area within the overall site’s gross floor area (GFA) calculations without any corresponding reduction in GFA elsewhere. In practical terms, they have added the park area to the site and compensated by increasing the building’s height instead.

There is also no clear information about how public access will be guaranteed or managed. If security or antisocial behaviour issues arise, as they already do in parts of Woolloomooloo and Forbes Street, will the park simply be fenced off and therefore become private, rather than, as promised, public? The DA should make these obligations clear and enforceable.

3. Poor Community Consultation

The developer’s consultation process has been minimal and inadequate. Residents were invited to a single online session where a presentation was given, but genuine questions were dismissed with promises of follow-up that never occurred. The

Appendix NN – Social Impact Assessment acknowledges community concerns but fails to show how they have been addressed. This falls far short of what could reasonably be called meaningful consultation.

4. Wind and Pedestrian Comfort

The *Pedestrian Wind Assessment (Appendix BB)* confirms that William Street already experiences strong wind conditions. Despite this, the report claims the new development will not worsen conditions. This seems unreasonable.

5. Parking Issues

The report fails to explain how retail visitors will access parking, given the lack of dedicated visitor spaces. It seems inevitable that drivers will attempt to park on nearby residential streets such as Forbes Street and Cathedral Street, worsening existing parking and traffic problems.

6. Misleading References to the “Design Excellence” Process

The DA repeatedly refers to the proposal as being based on a “winning design excellence process.” This is misleading. The current DA is **separate from the earlier Concept DA** and should not be presented as a continuation of that process.

7. Other Matters

The developer claims the project will deter crime and enhance social outcomes, yet no evidence supports this. The assurances about affordable housing also lack detail, there is no explanation of how rents, strata costs, or eligibility will be managed to guarantee genuine affordability.

In summary, the proposal fails to comply with key planning controls, relies on an incomplete visual assessment, and presents community “benefits” that are either overstated or unsupported. The development in its current form would unreasonably impact surrounding residents and should not be approved.

Thank you for considering this submission.