

Please find my concerns and objections to the proposed development at 164-194 William Street Woolloomooloo. It was very difficult to put together a considered reply to the development application given the 59 attachments consisting of over 2,000 pages for a very complex proposal when it was only on public exhibition for 14 days.

**1. Multiple developments being considered in isolation.**

I am not trying to stop development but rather trying to ensure development is both reasonable and appropriate for the area and looked at in a town planning way. There are multiple development applications being proposed under the State Significant Development that are within a few hundred metres of each other. It is poor town planning to consider each of these applications in isolation. The cumulative effect of them on the local environment is very significant.

**Current known local area developments:**

Location	Council approval	SDD	Comment
164-194 William	Building envelope approved 7 December 2023 <b>D/2022/139</b>	SSD-80211463 Feb 2025	Prior building envelope approval from City of Sydney is appropriate. SSD seeks to build an 18 storey building which massively exceeds the City of Sydney 2012 LEP.
134 William	Nil	SSD-78363487	SSD seeks to exceed the City of Sydney 2012 LEP. Seeking 12 and 14 stories
203-225 Victoria St Holiday Inn	Nil	SSD-84718460	SSD seeks to massively exceed the City of Sydney 2012 LEP. <i>1 x 4-5 storey building</i> <i>1 x 5-6 storey building</i> <i>1 x 35-40 storey building</i>
47-51 Riley St Woolloomooloo (Rose Group)	D/2022/1354	?	Proposed amendments to Sydney LEP 2012 by inserting new site-specific provisions. Height increase from 12m to 25 m; Increase maximum floor space ratio control from 2:1 to 3.2:1

**2. Visual Impact Assessment**

This is an extremely misleading and poor representation of the visual impacts of this proposed development. The developer is claiming a Clause 4.6 variation to allow the massive increase in height and are using the visual impact assessment as the rationale. They have provided a very tailored visual assessment that support their case.

Many of the visual impacts assessment they have included in their report are only from other surrounding buildings for those on lower levels whose view would be impacted even by a small compliant development so they are trying to show that there very high building is not going to worsen the impact. This is exceptionally misleading.

They have only included one visual impact for apartments above level 8 in the Horizon building – viewpoint 33. This is an apartment that does not look northward and does not look directly at the 18-story tower. They cleverly state: *The view loss, caused by the FJC massing proposal is Negligible, as a result of the relocated massing at the eastern end of the site.*

They have not included any visual assessments from the multitude of higher apartments that look toward the eastern side of the site where the proposed tower is located. This is misleading by omission.

It is deeply concerning that they have delivered a visual impact report that only considers the visual impact beyond ‘approved massing’ from the 2023 visual impact report\* they did which is vastly misleading as to the actual total visual impact. They are not stating the full visual impact that the new proposed development creates.

***This is a new DA and is separate to and not consequential to the approved Concept DA.***

\*

## urbaine design group

**Development Application:  
Nos.164-194, William Street, Woolloomooloo  
Visual Impact Assessment Report, October, 2023.**

For every view assessment on the 2025 Visual Impact assessment report they have claimed one or more of these 3 phrases:

- Visual Impact (**beyond approved massing**);
- proposed massing creates **no additional** view loss.
- Extent of **additional** impact (**beyond approved massing**):

For my apartment on level 8 they have erroneously claimed it as two different apartments – viewpoint 25 and viewpoint 26. Both of these representations and images are from my apartment. They claim that both representations are from from western facing apartments. This is an outright lie. Our apartment faces NNW. Viewpoint 25 is from 1m behind the balcony. Viewpoint 26 is from seated in our lounge room. I am shocked at how dark and dreary they have made this photo. They also claim that the view is over a side boundary but the City of Sydney have previously rejected that claim and you can clearly see that the view is not a sideways view. This is very poor and untruthful work.

These tables collate the 2023 and 2025 visual impact reports for my apartment and you can see that the combined impact is significant. In the 2025 assessment they only talk about the ‘additional’ impact, not the total impact.

<b>Viewpoint 25</b>	<b>2023 visual impact report- Urbaine</b>	<b>2025 visual impact report- Urbane</b>
Developer comment on view loss	The view loss, caused by all 3 building envelope overlays, is predominantly to Woolloomooloo – parts of the finger wharf and residential bowl to the south	The FJC proposed massing impacts upon a small area of the Harbour, distant northern ridgeline and sky view, together with the northern end of Potts Point.
Tenacity Assessment Summary:	Value of view: High View location: Secondary living space – standing 1m behind balcony balustrade. Extent of impact: Moderate. (Across side boundary).	Value of view: High View location: Secondary living space – standing 1m behind balcony balustrade. Extent of <b>additional</b> impact ( <b>beyond approved massing</b> ): Moderate.

<b>Viewpoint 26</b>	<b>2023 visual impact report</b>	<b>2025 visual impact report</b>
Developer comment on view loss	The view loss, caused by all 3 building envelope overlays, is predominantly to Woolloomooloo – parts of the finger wharf and residential bowl to the south	The FJC proposed massing impacts upon Woollomooloo Wharf, a small area of the Harbour and the northern foreshore.
Tenacity Assessment Summary:	Value of view: High. View location: Primary living space – standing 1m behind main glazing line. Extent of impact: Minor-to-moderate.	Value of view: High. View location: Primary living space – standing 1m behind main glazing line - living room. Extent of <b>additional</b> impact ( <b>beyond approved massing</b> ): Minor-to-Moderate.

They have not provided any information on the total extent of the visual impact to my apartment which I would rate as moderate to severe based on the Tenacity scale.

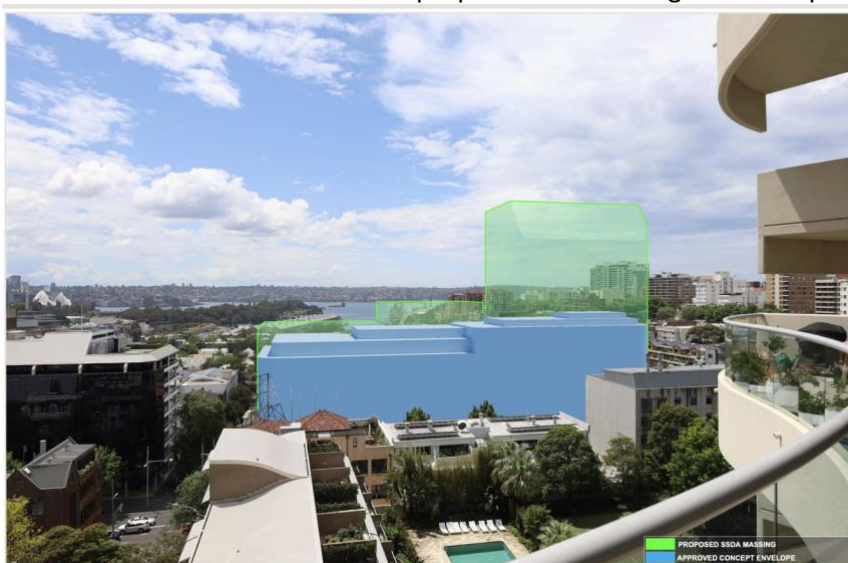
Below is my current view as per the developers 2025 visual impact assessment. The difference between the first image and the 3<sup>rd</sup> image is substantial.



Below is the view with the developers requested 30% extra height on top of the extra height for the 'park'.



Below is the view with the current proposal which is a significant impact.



Page 12 of the Department of Planning, Housing and Infrastructure In-fill affordable housing Practice note (December 2023) states the following:

*The full extent of the in-fill affordable housing bonuses may not be achieved on all sites, due to site constraints and local impacts. The in-fill affordable housing bonuses **should not be treated as an entitlement**. DAs that propose in-fill affordable housing will be subject to merit assessment by the consent authority. The application of the bonuses does not affect a consent authority's responsibility to consider the requirements of relevant EPIs, a development's likely impacts or the suitability of the site for the development.*

The developer is acting as though the full 30% is already approved and they are trying to make it appear they are offering a 'better' solution but are not disclosing the entire impact to multiple local residences.

In their own words they acknowledge that there are unreasonable environmental impacts.

**Appendix F\_Clause 4.6 Variation Report (Height)** page 4:

*"Through careful consideration and design exploration, the applicant's design team has explored the most appropriate ways to ensure that the floor space bonuses under the Housing SEPP respond most positively to the objectives of the height standard and **minimise unreasonable environmental impacts** to surrounding properties."*

### 3. **Privately owned, publicly accessible park**

There are a number of issues with the park. The development application has used the space that the 'park' now takes up and added that space to the rest of the floor space (GFA) for the building by adding more height. This is not actually stated anywhere by the developer. They have just added it.

The park is 1,356sqm. The gross allowable floor area (GFA) for the site is 33,036sqm. The gross floor area for the buildings is 33,036sqm. Where is any reduction of GFA as a result of the park inclusion?

Is it reasonable for a developer to decide to include a park on their site then claim additional height to make up for lost GFA?

The additional 8 stories of height could actually be addressed within the park space.

The Woolloomooloo/Darlinghurst/ Kings Cross areas have a diverse population.

The document provided in the application- Appendix NN Social Impact Assessment highlights a number of concerns that may well impact on the proposed park. The levels of homelessness and crime is significant in this area.

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ABS Homelessness data for the Potts Point—Woolloomooloo SA2 and City of Sydney LGA have been analysed alongside the City of Sydney Homelessness Street Count data to provide a detailed consideration of homelessness in the City of Sydney LGA. ABS Estimating Homelessness **estimated 249 homeless persons in the Potts Point—Woolloomooloo** area, at a rate of 136.9 per 10,000 people. This is higher than the rate of 48.7 per 10,000 people in Greater Sydney (25,479 people).

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## **Crime and safety**



Crime data (January 2024 – December 2024) from the NSW Bureau of Crime Statistics and Research (BOCSAR) indicates that **Woolloomooloo has higher rates of crime** (per 100,000 population) **for assault (non-domestic), and liquor offences** compared to the City of Sydney LGA and NSW averages.

**Two-year crime trends from January 2024 – December 2024 indicate that crime is generally increasing in stable** or not calculated by BOCSAR, though **malicious damage to property was down 13.2% and steal from motor vehicle was up 68.8%**.

Woolloomooloo is a **hotspot for assault (domestic and non-domestic), malicious damage to property, stealing from dwelling, person crimes and motor vehicle and motor vehicle theft**.

What happens when the local rough sleepers and other local characters start using the park at night?  
What happens when crimes, drug use and supply occur in this area?  
What is the comeback if the developer then closes the park off to the public?

Despite the developers claims, the proposed park has not been approved by the City of Sydney planning committee nor was it included in the building envelope for their DA **D/2022/139** approved by council on 7 December 2023.

As a result of the design excellence process the approved building envelope was “massaged” to incorporate the park and provide better views for the new apartments. This is developer speak for – we found a sneaky way to get more height. The developer keeps claiming that this is approved. It is NOT. They submitted the design excellence recommendation to the City of Sydney **but it was never assessed or approved** as the developer did not continue with the DA and chose to go down the SSD path. It is wrong for them to keep claiming that this is an approved option.

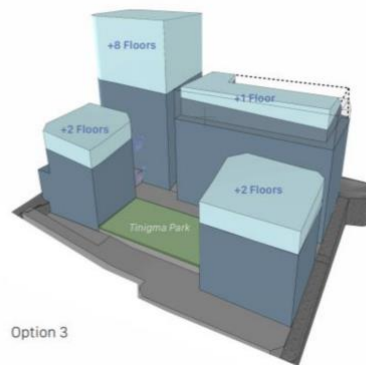
And;

***This is a new DA and is separate to and not consequential to the approved Concept DA.***

Below is their image of the new park and an image of the newest building proposal.



Figure 3: Alternative 30% uplift option, which reduces external impacts



When you compare the park image with the building design model, the park seems to be much larger than the claimed 1,356sqm? But it does look pretty..... If I was a rough sleeper, I would give it a whirl because it looks a lot nicer than where they currently sleep in Forbes Street. The reality is that the park will be surround on 3 sides by the apartment buildings (figure 3 above) and will be in shadow for most of the day and windy as per the wind report.

As you can see, the inclusion of the park has now afforded a very significant number of apartments with spectacular views towards the harbour, Opera House and Bridge. This greatly increases the sale value of these apartments and developer returns.

#### **4. Wind Assessment**

I have gathered this information from their document - *Appendix BB\_Pedestrian Wind Assessment*

Wind is a significant issue for William Street as their report shows.

Why do they think people will walk to the new retail offering?

What is the retail offering?

Why do they think pedestrians will love to stroll to their new building?

Why do they think residents will happily walk along windy William St to the train stations at Town Hall or Kings Cross?

There is no evidence to support their claims, in fact their report does the opposite.

Page 16 – this confirms that William Street is windy.

You can see that there is **NO** area suitable for outdoor dining either now or after the development is completed.

Description / Location		Wind Tunnel Results					
		Comfort rating, 5% exceedance wind speed (m/s)			Safety rating, 0.022% exceedance wind speed (m/s)		
		Configuration					
		Existing	Proposed - Low	Proposed - High	Existing	Proposed - Low	Proposed - High
Surrounds	1	4.3	4.6	4.3	8.7	9.6	8.7
	2	10.4	9.8	10.0	18.9	19.4	18.7
	3	6.9	5.9	5.7	12.2	11.3	10.9
	4	6.8	6.2	6.1	13.0	10.7	10.9
	5	4.0	4.4	5.2	6.9	8.0	9.3
	6	5.3	5.2	4.9	9.8	10.0	4.9
Site Edges	7	4.8	5.1	4.3	8.5	9.3	7.8
	8	5.5	6.5	5.7	10.4	12.2	10.2
	9	5.5	6.7	7.2	9.8	12.4	13.6
	10	8.2	8.0	8.2	16.6	15.5	14.4
	11	7.9	7.1	7.7	15.2	12.9	13.6
	12	7.0	6.8	5.3	13.7	14.0	11.7
	13	6.0	6.0	7.6	12.0	11.3	14.7
	14	5.4	5.0	5.3	11.6	11.1	11.1
	15	7.1	6.7	6.5	14.4	11.5	14.4
	16	6.8	4.9	6.3	13.4	8.6	11.5
	17	5.4	6.6	6.6	9.2	12.5	12.6
	18	5.0	5.5	6.6	8.8	9.7	12.9
Central Plaza	19		4.0	5.3		7.3	9.7
	20		3.3	5.1		6.8	9.9
	21		4.2	4.7		8.3	8.6
	22		3.6	4.4		8.8	8.3
	23		3.9	5.1		7.1	9.0
	24		5.4	5.2		10.1	9.1
Average (1-18, -6)		6.3	6.2	6.4			



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On Page 18 they have identified the areas they measured for wind impact for the proposed building. You can see that the new ‘park’ is not comfortable for outdoor dining. The pedestrian seating is only practical in the corners of the park. There are a lot of pedestrian standing areas, but do people really want to come to a park and stand?

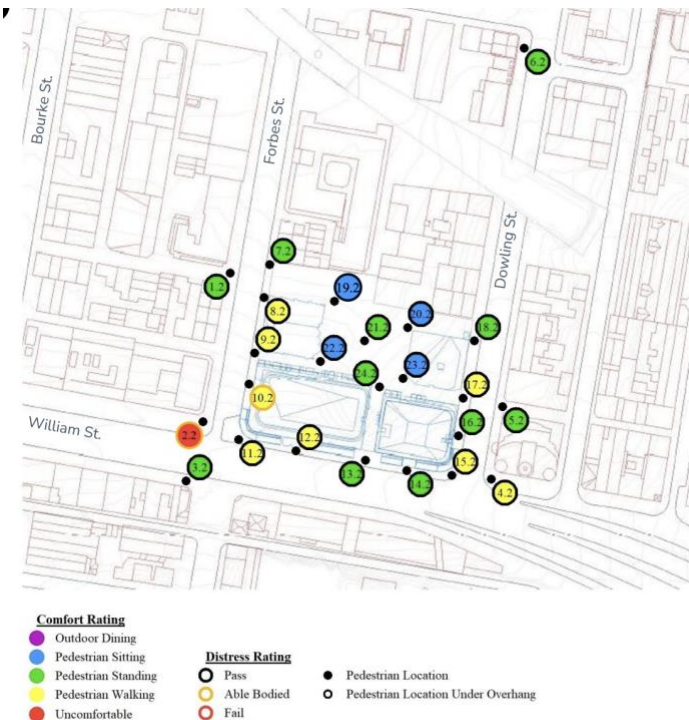


Figure 6: Pedestrian wind speed measurement locations with comfort/safety ratings – Initial Scheme

## 5. In-fill affordable housing

There is absolute agreement that affordable housing is needed. But there is also a requirement to ensure that it is made affordable for all those that need it, including people on very low incomes.

Pages 53-54 In the Appendix NN Social Impact Assessment

The proposed dwelling mix is as follows:

*One-bedroom apartments: 12 build to sell and 42 affordable*

*Two-bedroom apartments: 53 build to sell and 18 affordable*

*Three-bedroom apartments: 89 build to sell*

*Penthouse apartments: 13 build to sell*

So of the 60 apartments they are promising, 42 of them are one bedrooms for only 15 years. That is not going to address housing needs, it won't help families and only increases the developer's profits.

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*Bridge Housing is intended to be engaged to manage the affordable housing component. Bridge Housing has provided a letter of support to confirm their ongoing commitment to managing the affordable housing component of the proposal (Community Housing Provider Letter, 2025).*

In this letter, Appendix J\_Community Housing Provider Letter, Bridge Housing finish with:  
*subject to the negotiation of commercial terms for the arrangement.*

So there are conditions attached to Bridge Housing taking on the role of CHP that have yet to be agreed on. Will this agreement need to be signed off prior to the building going up?

Will they really only charge \$200 weekly rent for a single person living in a 1 bed apartment? This is based on 30% of a person on a very low income. These will be luxury apartments.

Household size	Very low	Low	Moderate
Single	\$33,600	\$53,800	\$80,700

Who will cover the strata costs, council rates etc? None of this rental element is discussed in the SEARs.

According to the Rental Affordability Index (SGS Economics and Planning 2024), Woolloomooloo's rental market was considered '**unaffordable**' for the average household income as of 2024 Q2.

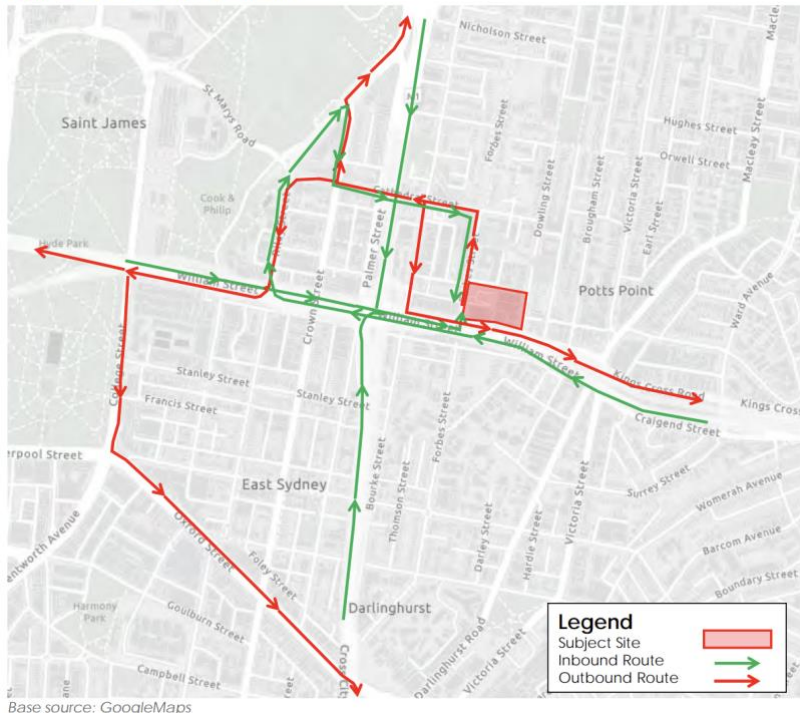
The Index found Woolloomooloo to be '**severely**' to '**critically unaffordable**' for all ten household types, including single working parents, dual-income families, hospitality workers, minimum wage workers and single person on benefits.

## 6. Traffic Report

Appendix T Transport Impact Assessment

Page 25 - This suggests vehicles will turn right into William St from Bourke Street – which is a no right turn. Alternatively, they are trying to show they are coming from the Eastern Distributor exit. This section of William Street between Forbes and Bourke Sts is congested for most of the day with vehicles blocking the intersections in frustration of trying to turn into the street. This will likely result in forcing traffic to go through the narrow local back streets of Woolloomooloo.

Figure 6.2: Service Vehicle Routes



Page 60 in their report - Appendix NN Social Impact Assessment highlights traffic as a significant concern.

Council policies highlighted that walkability and cycling are increasingly a priority for the city, and the proposal should prioritise connection to such active transport network (Chapter 3). During the SIA field study (Chapter 4), community members raised concerns over potential increased vehicle and pedestrian traffic, as well as parking demand. The existing congestion along William Street close to the entrance to the Cross City Tunnel was highlighted, as well as along Dowling Street and Forbes Street. Many expressed concerns over the traffic implications created by the proposed development during construction and operation phases and emphasised that the current road infrastructure does not meet demand.

Page 34 - Appendix T Transport Impact Assessment

### 7.1.2 Retail

All proposed retail car parking is to be allocated for staff only, with no customer parking proposed given the prime location of the site that would likely see the retail tenancies attract walk-up customers from the local area.

This point is very concerning.

There are already multiple empty shops along William Street due to the wind impacts for pedestrians and very limited parking to access the retail outlets.

They have clearly stated that there is no provision for retail visitor parking. Will shoppers then try and park in Forbes Street and walk across the road? Will they try and park in Cathedral Street and other nearby streets? What type of retail are they planning? There is no information regarding this.

Where is the supporting data that retail visitors will walk there when they have not yet determined what type of retail?

## 7 Other considerations

Page 65 - Appendix NN Social Impact Assessment

The developer claims that putting in this development can deter crime and offenses. I cannot see any evidence to support this claim. All they have done is make a list of possible mitigations but no evidence of how effective these will be.

### 6.2.6.1 Contribution to activation and safety of Woolloomooloo and surrounding districts

Affected stakeholders	Duration of impact
Immediate social locality (current and future residents, local businesses, site users and visitors)	Operation
<b>Assessment – without mitigation:</b> Medium positive	
<p>Thoughtfully designed and well-utilised activated spaces can deter potential crime and offenses. These spaces increase foot traffic, encourage social interaction, and foster a sense of community, providing natural surveillance and an environment that can discourage potential offenders.</p> <p>As reported in the Crime Prevention Through Environmental Design (CPTED) assessment (Urbis, 2025), the site currently consists of an unoccupied and inactivated commercial building and the No Birds Bayswater Car Rental building, both with associated car parking towards the northern end of the site. The rear boundary of the site, accommodating the car parking along Forbes Street and Judge Lane, is marked by net fencing and barbed wire. No evidence of graffiti or rubbish was found surrounding the site. At the time of the CPTED site visit, there was medium residential and pedestrian activity around the site, and no activity along Judge Lane.</p>	

Below is their recommended social mitigation but no information on if these will be implemented:

- Due to the high level of crimes and offences around the site, provide additional security on-site during the construction period to prevent and deter common offences in the local area. This could include hiring security personnel, installing temporary CCTV cameras, implementing controlled access points, and providing secure storage for construction equipment.
- In consideration of the high proportion of homelessness in the vicinity of the site and the potential for the public space to host a portion of this population, it is advised that the proponent work with Council and local support services to provide support and programming for these individuals. This could be part of a broader community contribution, ensuring that the development not only addresses immediate safety and security concerns but also fosters inclusivity and support for vulnerable populations.

One of their mitigation strategies is to implement controlled access points. How does this work for a public park?

They are also offering up the council and the community to provide support and programs for the homeless people who may use the public space. They are creating an issue and wanting someone else to solve it??

The developer has a history of trying to get this 'tower'. Below is a snip from a meeting with City of Sydney Council back in June 2021.

Page 17 - <https://meetings.cityofsydney.nsw.gov.au/documents/s79254/Development%20Application%20164-172%20and%20174-194%20William%20Street%20Woolloomooloo%20-%20D2022139.pdf>

#### Pre-Planning Application Concept - 3 June 2021

13. A preliminary meeting was held to discuss a planning proposal for an "Urban Village" scheme seeking a height of 110.95 metres AHD (RL 88.39) consisting of 22,830 sqm of residential, 3,795 sqm retail, 318 sqm community, 2,452 key worker housing, 4,607 sqm hotel, 3,940 sqm creative commercial totalling 37,942 sqm at 6:1 FSR.
14. The applicant was advised that City staff were very unlikely to support such a scheme in this location, and a view impact analysis should be conducted before developing the site or consider going above the 35m/22m the existing height controls.

The drawings of the various buildings show that they are wanting to have roof top areas.

There is no information on what structures may be placed on top of the rooves for this. Will there be trees, plants, shades?

What about all the plant and lift structures – these need to be identified within the permitted heights and not be added on after as these also add height and bulk.

There are so many areas that are not included in this application that it is very difficult to really understand what the end proposal is.

Thank you for your time.