
Submission: Objection to State Significant Development Application SSD-80211463

Project: Mixed-Use Development, 164–194 William Street, Woolloomooloo, NSW

Lodged by: Guyon Holland

Address: 20/1-5 Rosebank Street (“Rosebank”), Darlinghurst NSW 2010

Date: 12 November 2025

To: The Secretary, Department of Planning, Housing and Infrastructure (DPHI)

I submit this objection to the proposed State Significant Development (SSD-80211463) at 164–194 William Street, Woolloomooloo.

I am an adjoining resident whose property is directly and materially affected by the proposal. This submission sets out the key deficiencies and impacts of the application and requests that the Department refuse the proposal in its current form.

1. Deficiencies in Appendix S – Visual Impact Assessment (Urbaine Design Group)

The *Appendix S Visual Impact Assessment* is **fundamentally misleading and inadequate**. It fails to present the visual impacts from the true baseline of the *existing site conditions* and instead appears to measure incremental change only against the **previous City of Sydney development consent**, which is irrelevant to the actual visual environment that currently exists.

Further, the report restricts its analysis to a **single ground-floor apartment** within my complex, ignoring nine other apartments spanning four storeys that have substantially broader and higher-value view exposure.

Upper-level apartments enjoy panoramic views of the Harbour Bridge, Opera House and city skyline that are entirely unassessed.

By omitting these dwellings, the report materially misrepresents the extent of impact and cannot be relied upon to determine view loss under accepted planning principles. A full, independent, and transparent reassessment must be undertaken from all relevant vantage points, using existing-condition photomontages rather than incremental comparisons.

2. Devastating Loss of Iconic Views (Tenacity Consulting v Warringah Council 2004 NSWLEC 140)

The proposal will cause **devastating view loss** as defined under the *Tenacity* planning principle. From my apartment, currently unobstructed views of:

- The **Sydney Opera House**,
- The **Sydney Harbour Bridge**,
- The **city skyline**, and
- Distant vistas to **North Sydney and Kirribilli**,

will be almost entirely removed.

These views are enjoyed from seated positions at least one metre inside the principal living and dining areas, and from balconies on both apartment levels.

Standing views from the upstairs master bedroom will likewise be lost.

This represents the total loss of “high-value iconic views” — the top tier of view significance recognised by the Land & Environment Court.

The impacts extend beyond amenity to **loss of cultural experience**, as visibility of events such as *Vivid Sydney* and *New Year’s Eve fireworks* will be eliminated.

The proposal therefore fails the *reasonableness* limb of the *Tenacity* test and should not be approved without substantial height and mass reduction.

I have attached various photos of the views from within my apartment at the end of this document. **PLEASE NOTE** that my iPhone camera **uses a wide angle lens** and as such makes any object in the middle to background **appear smaller and further away** than they appear to the naked eye.

3. Loss of Property Value

Severe or devastating loss of iconic views produces a measurable and recognised **erosion of property value**.

Independent valuation practice routinely quantifies view premiums, particularly where harbour or skyline vistas form a key component of market appeal.

By extinguishing such views, the proposed development will directly devalue affected properties.

While financial loss is not itself a planning head of objection, the economic consequence underscores the **public interest imbalance** created when one landholder’s gain derives from the uncompensated loss of multiple neighbouring properties.

4. Loss of Privacy

The orientation and height of the proposed tower building will completely remove the remaining **visual privacy** achievable within my apartment.

Currently, partial screening and window treatments allow privacy while retaining daylight and views.

Once the new structure fills the entire outlook, this equilibrium is lost — interior spaces become directly exposed to a relatively close, elevated façade.

Privacy loss will be acute on my **upper-level balcony**, which will sit far below the new tower’s vantage, subjecting it to direct overlooking and overshadowing.

The design fails the *Apartment Design Guide* objectives for visual privacy and separation distances and should be redesigned to include increased setbacks and screening treatments.

5. Questionable Public Benefit of Proposed Green Spaces

The EIS claims substantial community benefit through new green-space provision.

However, the surrounding Woolloomooloo open spaces north of the site are **already under-**

utilised due to poor passive surveillance and legitimate personal-safety concerns, particularly after dark.

Without clear evidence of improved activation, lighting, or management, the proposed green-space “benefit” is illusory and cannot justify the development’s visual and amenity impacts. Urban design interventions that do not demonstrably enhance safety and usability should not be treated as compensatory public benefit.

6. Traffic and Access Constraints

Vehicle access to and from the site will remain **fundamentally constrained** by the road network geometry:

- No direct westbound entry from Forbes Street or Dowling Street;
- No right-turn egress onto William Street;
- Peak-hour congestion already severe at the Forbes/William intersection.

Even with traffic management measures, vehicle movement associated with construction, residents, retail, and service vehicles will compound the existing congestion and increase safety risks to pedestrians and cyclists.

A detailed, independent **Traffic Impact Assessment** must be commissioned addressing these geometric constraints rather than relying on theoretical modelling.

7. Disproportionate Developer Benefit from Affordable-Housing Bonuses

The proponent appears to rely on **affordable-housing incentives** under the *Housing SEPP 2021* to justify additional floor-space and height beyond the base controls.

While the objective of affordable housing is supported, the **extent of bonus yield** granted here produces a grossly disproportionate advantage to the developer, enabling excessive profitability well beyond reasonable expectations.

This uplift comes directly at the expense of neighbouring residents who suffer devastating loss of view, privacy, and amenity.

The Department must ensure that any bonus applied is commensurate with the genuine public benefit delivered — both in percentage of affordable dwellings and in duration of management by a registered community-housing provider without dismissing the impacts, particularly financial on adjoining property values over time.

8. Local community character and transient population

Woolloomooloo’s community includes a broad and transient population — residents, short-term renters, backpackers, and both domestic and international visitors.

Any large-scale development must demonstrate sensitivity to this unique social mix, ensuring that design, public-domain activation, and safety measures reflect the diversity and mobility of local occupants.

The EIS does not adequately consider these social and behavioural dynamics, creating risk of disharmony and reduced amenity.

9. Requested Actions

I respectfully request that the Department of Planning, Housing and Infrastructure:

1. Reject the *Appendix S Visual Impact Assessment* as misleading and require a full re-assessment based on existing baseline conditions and all affected dwellings;
 2. Commission an **independent visual-impact peer review** under the *Tenacity* principle;
 3. Require significant reduction of building height and massing to restore reasonable view-sharing outcomes;
 4. Mandate privacy-compliant setbacks and screening to adjoining residential properties;
 5. Re-evaluate the public-benefit claims of the proposed green space;
 6. Undertake a rigorous traffic and access analysis reflecting real-world network limitations;
 7. Reassess any affordable-housing bonus to ensure proportionality between public benefit and private gain.
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Conclusion

This proposal, as currently designed, fails to achieve a reasonable balance between development opportunity and protection of existing residential amenity.

It offends established planning principles of **view sharing, privacy, traffic safety, and public benefit proportionality**.

Accordingly, I request that SSD-80211463 be **refused** or substantially redesigned prior to any determination.

Thank you for considering my submission.

Please keep me informed of any further public exhibition, modification, or determination.

Yours faithfully,

Guyon Holland]

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Photos identifying high value views from Apartment/Unit 20

NOTE: An iPhone 12 Pro was used. The lens is wide angle and causes objects in the middle distance and background to appear smaller and further away than that as sighted with the naked eye. Some photo's have been zoomed to more accurately show the significant presence the iconic structure have from the apartment.



(TOP) Living Room (1st floor of U20) – SEATED position more than 1m back from window – (photo zoomed to reflect more of naked eye perspective).

(BOTTOM) Adjacent Dining area (1st floor of U20) – SEATED position more than 1m back from doors)



View SEATED from Balcony doors (1st floor of U20) between the living and dining room – photo taken from more than 1m within the apartment



View SEATED from balcony off living room (noting wide angle lens making things appear smaller and further away than they appear to the naked eye).



(BELOW) Zoomed view SEATED from balcony being more representative of the naked eye



View SEATED from balcony off Dining Room (1st floor of U20)



View from Master (**2nd floor of U20**) bedroom window (standing 1m in from window – zoomed to represent naked eye)



(BELOW) Same master bedroom window – Standing not zoomed



View from upstairs Balcony (2nd floor of U20) – SEATED more than 1m inside the balcony – slightly zoomed)



(BELOW) View from 2nd Balcony SEATED up against the balustrading

