

Submission on State Significant Development Application:

164–172 & 174–194 William Street, Woolloomooloo NSW 2011
(SSD-80211463)

From:

Yarek Alexander
Horizon
Apartment 402/ 184 Forbes Street
Darlinghurst NSW 2010

ytj@bigpond.com.au

0412 311 443

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1.0 Executive summary

I am a resident of Forbes Street, Darlinghurst and I am directly impacted by the proposed State Significant Development at 164–172 & 174–194 William Street.

I submit this objection and request that the Department of Planning and Environment do not provide consideration to consent until compliance is undertaken by the Developer/ Owner is to address and comply with the Woolloomooloo Tripartite Government agreement to:

- a) limit high rise development;
- b) be consistent with provision of Public Housing at a rate of 65%;

Serious consideration must be afforded to rejection of the development based on the cumulative effect of introduction of high-rise on the edge of the Woolloomooloo ridge and substantial dilution of the percentage of Public Housing stock in Woolloomooloo.

In summary, I submit this objection and request that the Department of Planning and Environment defer or refuse consent until an acceptable response is provided by the Developer addressing the Tripartite Agreement 1975.

The proposal should be rejected on architectural grounds until further design development is undertaken to the building ensuring design excellence is achieved. This design excellence must address the following concerns:

- a) a positive contribution to the urban built form fabric;
- b) a contribution to the streetscape as it affects the length and breadth of William Street, at street level, and explore building material use to give an interesting façade;
- c) provide a more interesting building massing, with greater articulation;
- d) disclose allocation of Affordable Housing units and detail of their design.

1.1 Introduction

The primary concerns are two-fold:

- Tripartite Woolloomooloo Agreement, 1975.

The proposed development does not address and has a complete lack of consideration to the requirements of this agreement, which is a lawful requirement running in parallel with the environmental and planning SEPPs in New South Wales.

- Architectural merit.

The design presented has been rushed to application and is completely lacking in design development of the exterior. This contrasts with the previous submission which experienced extensive design development with the Council of the City of Sydney driving the design excellence. There is no such finesse or quality of design with this submission. The proposal is simply a numerical exercise to maximise floor area, apartments and return to the developer.

This formulaic approach leaves no attention to the elements of the building that matter:

- a) a positive contribution to the urban built form fabric;
- b) a contribution to the streetscape as it affects William Street, at street level;
- c) provide a more interesting building massing, with greater articulation;
- d) disclose allocation of Affordable Housing units and detail of their design.

2.0 Tripartite Woolloomooloo Agreement, 1975

This ground breaking commitment was made between the City of Sydney, the NSW Government and the Australian Government. The premise of the agreement was to protect peoples' houses from redevelopment and high-rise development. It also created new public housing in Woolloomooloo.

2.1 Tripartite Woolloomooloo Agreement, ban on High-rise buildings

The agreement, bound in law undertook to completely stop all high-rise development. This was an extension of the green bans of the 1970's and prohibited high rise development of any type in Woolloomooloo, both commercial or residential.

The proposal for the William Street site introduces new 10-18 storey buildings in Woolloomooloo on the periphery of the suburb located almost at its highest point the far south along William Street. At present there is already a number of commercial building along William Street, Harders, The Boulevard and similar up to 22 storeys in height. These buildings, when observed from the Woolloomooloo basin create a toothed building effect. This staggered up and down effect somewhat mitigates the height of these buildings. By infilling the height plane by utilising height uplift gained from the Affordable Housing SEPP, this encircles or walls Woolloomooloo in a grossly unsatisfactory manner. The Potts Point ridge already overlooks and wall the suburb from the East. The nett effect of the proposal is to tower or dwarf the suburb from the south with an infilled tall wall of encircled buildings.

2.2 Tripartite Woolloomooloo Agreement, ban on High-rise buildings

The agreement undertook to maintain and redevelop Woolloomooloo into a primarily low-rise residential area with 65% of housing to be Public Housing. Public Housing implies ownership of that housing stock by the people, owned by the State government and government of Australia.

All residential developments since that time in the Woolloomooloo area have substantially diluted the Public Housing component well down from 65%. (A conservative estimate is as follows:

- public housing 2,500 residential units (1975)
- non-public housing 1500 residential units (1975)
- residential developments since 1975, 1300 additional units (principally Woolloomooloo Wharf, 320 units, Crown Gardens, the former ANZ refurbishment and the Cowper Wharf Road development and a further twenty developments of under twenty units, collectively adding about 1500 units to Woolloomooloo since 1975.

This has roughly doubled the residential units from the 1975 figure of approximately 2,500 residential places to about 5,500 residential places present day.

The outcome is that the Public Housing component in Woolloomooloo has dropped from about 65% in 1975 to approximately 45% present day. The William Street development will bring this figure to below 40%.

It can be clearly seen that all the progressive development over the last fifty years has substantially eroded the Public Housing component from Woolloomooloo. This suburb is uniquely positioned to contribute to the housing stock by proactive Government addition to the Public Housing stock and at the same time it is uniquely protected from overzealous development adding housing to the private housing market.

2.3 Request

I submit this objection and request that the Department of Planning and Environment do not provide consideration to consent until compliance is undertaken by the Developer/ Owner is to address and comply with the Woolloomooloo Tripartite Government agreement to:

- a) limit high rise development;
- b) be consistent with provision of Public Housing at a rate of 65%.

2.4 Recommendations

Serious consideration must be afforded to rejection of the development based on the cumulative effect of introduction of high-rise on the edge of the Woolloomooloo ridge and substantial dilution of the percentage of Public Housing stock in Woolloomooloo.

3.0 Architectural merits

The design presented has been rushed to application and is completely lacking in design development of the exterior. This contrasts with the previous submission which experience

extensive design development iterations with the Council of the City of Sydney driving the resultant design excellence. There is no such finesse or quality of design with this submission. The proposal is simply a numerical exercise to maximise floor area, apartments and return to the developer. This formulaic approach leaves no attention to the elements of the building that matter and fail to consider:

- a) a positive contribution to the urban built form, fabric and the current design is which is currently bland and reminiscent of a 1980's office block;
- b) a contribution to the streetscape as it affects the length and breadth of William Street, at street level and provide considered and responsive building material use to give an interesting facade, when observed from close by at street level;
- c) provide a more interesting building massing, with greater articulation;
- d) disclose allocation of Affordable Housing units and detail of their design.

3.1 Request:

To address these issues, it is suggested that the following be undertaken to redesign the building ensuring design excellence is achieved. This design excellence must address the following concerns:

- a) Redesign south façade and provide articulation and depth to the William Street Façade;
- b) Provide a considered and responsive street level functional and contributory design and provide street-level design compatible with a major boulevard enhancing pedestrian use. Explore building material use to give an interesting facade, when observed from close by at street level;
- c) Provide an interesting and visually engaging facade when viewing the building from afar including distant views and panorama views;
- d) The Developer must demonstrate how the affordable housing apartments are allocated. Is the Affordable Housing simply the last fifteen percent of apartments not to be sold or are they congregated in a section of the building effectively creating a second class of apartment, with access entry and consolidated marginalised units and are the affordable units afforded access to amenities, roof top, swimming pool etc or are they to be excluded as has happened in other affordable housing allocations in the City of Sydney?

3.2 Recommendations

I contend that the proposal should be rejected on architectural grounds until further design development is undertaken to the building ensuring design excellence is achieved. This design excellence is suggested to be measured by a positive interactive process and response from the City of Sydney Council, as occurred in the first iteration of this project proposal.

Yours sincerely,
Yarek Alexander
ytj@bigpond.com.au
0412 311 443

Historical footnote

A number of high-profile proposals in the immediate precinct have previously been withdrawn or refused specifically because of overcrowding and infrastructure strain, including the following:

- In 2018, the major redevelopment of the old Kings Cross Shopping Centre site was withdrawn following widespread community objection and concern about the precinct's capacity to absorb further density.
- The City of Sydney has on multiple occasions expressed that new large-scale projects in the Kings Cross/Darlinghurst basin must be "self-contained" in terms of parking, loading and open-space provision, because existing infrastructure is already overstressed.
- Previous Woolloomooloo mixed-use proposals have been scaled back after Transport for NSW and local stakeholders raised safety and congestion issues relating to the narrow one-way street network and limited access to arterial roads.

Despite these precedents, the 164 William Street EIS is put forward to proceed as though the precinct has an unlimited capacity to maximise developer yield.

This disregards prior warnings from Council and ongoing infrastructure failures in the area and shows that the developers have not considered previous attempts to over-develop the area when developing their proposal.