

Attachment C

Submissions

From: [REDACTED] <[REDACTED]> on behalf of [REDACTED]
<[REDACTED]> <[REDACTED]> <[REDACTED]>

Sent on: Sunday, April 12, 2026 9:15:33 AM

To: council@cityofsydney.nsw.gov.au

Subject: Comment on D/2026/262

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I wish to provide comment on a DA.

DA No D/2026/262

4 Albion Street Surry Hills

43 Albion Street Surry Hills

I would like all of my identifying information concealed.

I object to the expansion of the existing brothel.

I acknowledge that there is already a brothel in the location but believe that expanding this is not in the interest of maintaining the character of the neighbourhood.

Specifically the immediate area has many residences with children. More people are moving into the area and buildings are becoming more residential rather than business use.

While the documents imply that there will be no impact. I do not believe that this is true.

I do not have faith that the rooms designed with showers will not be used as client rooms. This greatly increases the capacity of the business. It is in effect planned to be a much larger expansion than is acknowledged in the documentation. These rooms include:

- Staff make up /powder room,
- Staff gym
- Managers room
- Client waiting room
- Two attic spaces.

Each of these six (6) rooms are designed with a shower and are exactly the same as a client room.

There will be greater pressure on parking, pedestrian movement and other service vehicles including waste management vehicles.

I object to the rear lane being used for any customer entrance - disabled or otherwise. I believe that the existing business did previously use the rear for customer entry, regardless of any management documents.

Night safety is of immediate concern. We have female friends that will not walk down that lane at night because they do not want to be in contact with leering customers. This will be magnified with greater expansion of the business.

I am concerned that the large concrete covered area at the rear of the property has no designated use. I believe that this has been designed so that in the future, it could be walled and incorporated into the brothel. This greatly increases the potential of the brothels expansion.

The owners already have another brothel on Commonwealth Street and i believe that they house many of the staff in the immediate vicinity. The expansion of the this business will negatively effect the make up of the residential population as there will be more sex workers living in the area. I have no objection to sex workers. However, one owner and several buildings in the area that are occupied by the same business negatively changes the atmosphere of the place.

I believe that the plan for the brothel is to have at least 6 more rooms as client rooms that are not designated in the documentation. There is potential for even further expansion. This is a design for a 'super brothel', not an expansion of two client rooms.

On these grounds I object to the expansion.

Many thanks



From: [REDACTED] <[REDACTED]> on behalf of [REDACTED] <[REDACTED]>
<[REDACTED]> <[REDACTED]>

Sent on: Monday, April 13, 2026 2:33:00 PM

To: council@cityofsydney.nsw.gov.au

Subject: Objection to Development Application D/2026/262 41 Albion st SURRY HILLS NSW 2010 , 43 ALBION st SURRY HILLS NSW 2010

Caution: This email came from outside the organisation. Don't click links or open attachments unless you know the sender, and were expecting this email.

**To: The Planning Department
. City of Sydney Council**

First & most importantly: "I DO NOT WISH TO HAVE MY DETAILS SHARED WITH THE APPLICANT OF THE BELOW DA- EITHER IN WAY OF MY PERSONAL NAME, ADDRESS, EMAIL OR TELEPHONE NUMBER "

Subject: Objection to Development Application D/2026/262 41 Albion st SURRY HILLS NSW 2010 , 43 ALBION st SURRY HILLS NSW 2010

Dear Sir/Madam,

I am writing to formally object to the above Development Application concerning the proposed expansion of sex premises located at 43 Albion St Surry Hills

I am a neighbouring resident, living near to this property, and I have significant concerns regarding the impact this proposal will have on my family, my children, and the surrounding residential community.

1. Noise and Amenity Impact

An expansion of the business will inevitably increase the frequency and intensity of this disturbance, further degrading our quality of life.

2. Impact on Children and Family Environment

As a parent of young children, I am deeply concerned about the exposure to adult activities and associated noise. This is not a theoretical concern— Increasing the scale of the operation will worsen this situation and is incompatible with a family-oriented residential neighbourhood.

3. Increased Traffic and Client Activity

The proposed expansion is likely to result in a higher volume of clients, increased vehicle movements, and greater foot traffic at all hours. This will affect safety, privacy, and the quiet character of our neighbourhood.

4. Incompatibility with Local Character

The area has been promoted as part of a “city of villages,” emphasising community, liveability, and residential amenity.

Expanding a commercial sex services premises in such close proximity to family homes directly contradicts these planning principles.

5. Cumulative Impact

. The proposal represents an intensification of use that is not appropriate for this location, also number 41 Albion st is not zoned for sex on premises

6.Rear lane Access Impact

Previous DA had no clients access to rear lane due to impact of traffic & noise in a tight lane way, unsure why it is now attached to this DA, wheelchair access can be on Albion st in way of ramp from the footpath

7 Concerns Regarding Accuracy of Cost Estimate

Based on the nature of the proposed development, including [e.g. structural changes, internal fit-out, services upgrades, expansion of usable floor space], it is difficult to reconcile the stated cost with current construction and labour costs. Comparable building works of a similar scale would typically attract a substantially higher valuation. in excess of X 7 - 8 x times that of the purposed amount

I believe this raises concerns about whether the application has been properly classified and assessed.

Request for Independent Verification

Given these discrepancies, I respectfully request that Council require:

- A detailed and itemised cost breakdown
- Independent verification of the estimated development cost
- Reassessment of the application if the true cost places it in a different assessment category

Until the cost of the development is transparently and accurately established, I believe the application cannot be properly evaluated.

In summary:

Given the above concerns, I strongly urge the Council to refuse this Development Application.

I request that my submission be formally considered and that I be notified of any decisions or further developments regarding this application., **once again requesting that my personal details not to be shared to the applications of this DA**

Yours faithfully,

██████████

██████████ Albion St
Surry Hills NSW

From: [REDACTED] <[REDACTED]> on behalf of [REDACTED] <[REDACTED]>
<[REDACTED]> <[REDACTED]>

Sent on: Friday, April 17, 2026 8:53:46 PM

To: dasubmissions@cityofsydney.nsw.gov.au

Subject: Submission - D/2026/262 - 41 Albion Street SURRY HILLS NSW 2010 - Attention Max Di Rosario

Caution: This email came from outside the organisation. Don't click links or open attachments unless you know the sender, and were expecting this email.

Dear Sydney City Council

I live in close proximity to the subject site and already experience the pattern of late-night activity associated with this and surrounding premises. The proposal represents a clear intensification of this type of use through expansion into an adjoining property, which is likely to increase patron numbers and associated movements.

Of particular concern is the likely increase in late-night arrivals and departures, including short-stay vehicle movements, which have a direct impact on residential amenity. In my experience, the surrounding streets have limited capacity to absorb additional late-night activity without disturbance.

Given the predominantly residential character of this part of Surry Hills, the proposed expansion is likely to result in a measurable decline in amenity.

For these reasons, I object to the proposal.

Sincerely

[REDACTED]

[REDACTED] Commonwealth St, Surry Hills

From: john jeonggwan <[REDACTED]> on behalf of john jeonggwan
<[REDACTED]> <john.jeonggwan@[REDACTED]>
Sent on: Monday, April 20, 2026 11:09:31 AM
To: City of Sydney <council@cityofsydney.nsw.gov.au>
Subject: Objections - D/2026/262 - 41 and 43 Albion Street Surry Hills NSW 2010
Attachments: 26-4-20 Objections.pdf (513.19 KB)

Caution: This email came from outside the organisation. Don't click links or open attachments unless you know the sender, and were expecting this email.

Dear Mr Max Di Rosario
Assessing Officer
Planning Assessments

The purpose of this email is to file the attached objections on behalf of the local residents to this Development Application D/2026/262 and the proposed development at 41 and 43 Albion Street Surry Hills.

The resident Objectors have signed in the panel on the last page. The Objectors claim privacy and confidentiality and ask that their names and details are not published to the applicant Ms Shiela Liew and associated interests.

Thank you

Surry Hills Action Group (SHAG)

[REDACTED]

SHAG respectfully acknowledges the traditional owners and custodians of the land and waterways on which we work and live, the Gadigal People of the Eora nation. We pay our respects to their Elders, past and present, and remember that sovereignty was never ceded.

OBJECTIONS

D/2026/262 for 41 and 43 Albion Street SURRY HILLS NSW 2010

council@cityofsydney.nsw.gov.au

PRIVACY

The objectors (whose details and signatures appear in the Table at the end of these Objections) claim the right to privacy and confidentiality so their names and addresses are not published to the DA applicant.

Introduction

At the outset it is appropriate to say that this submission does not object to the operation of Brothels per se.

We object to Council giving approval for another Brothel to be opened at 41 Albion Street SURRY HILLS, albeit disguised as a mere extension of an abandoned use Brothel at 43 Albion Street SURRY HILLS.

These objections are based on two issues:

1. "Abandonment" of the previous approved usage of 43 Albion Street as a Brothel. This arises as there has been no continuous usage of 43 Albion Street for more than 12 months between January 2025 (when the current owners/ operators purchased 43 Albion Street) continuing to date (being 15 months): *Environment Protection and Assessment Act* s4.66(2)(e) and (3);
2. An immediate "Clustering" or concentration of Brothels at the adjacent properties located at 41 and 43 Albion Street SURRY HILLS and a clustering or concentration of Brothels in the vicinity: see Table A; under the Sydney Development Control Plan 2012 (SDCP) which relevantly provides that Brothels should not be clustered or concentrated in one area.

This submission contends that consent should be refused where the existing usage at 43 Albion Street Surry Hills has been abandoned for more than 12 months, and the proposal will create or add to a concentration of brothels in the same street (Albion Street) or

immediate vicinity (Albion, Commonwealth, Reservoir and Bellevue streets): see Tables A and B.

There are a multiplicity of Brothels already located in the immediate vicinity within 75 metres and more Brothels out to about 300 meters from the subject premises: see Tables A and B.

Objections

These objections are based on a number of issues:

1. Abandonment
2. Clustering
3. Expansion of existing Brothel operations within adjoining buildings
4. Inadequate Plans
5. Dilapidation
6. Loss of residential usage in a tenancy crisis

1. Abandonment

The Environmental Planning and Assessment Act 1979 s4.66 - Continuance of and limitations on existing use relevantly provides:

(1) Except where expressly provided in this Act, nothing in this Act or an environmental planning instrument prevents the continuance of an existing use.

(2) Nothing in subsection (1) authorises--

...

(e) the continuance of the use therein mentioned where that use is abandoned.

(3) Without limiting the generality of subsection (2)(e), a use is to be presumed, unless the contrary is established, to be abandoned if it ceases to be actually so used for a continuous period of 12 months.

The 43 Albion Street premises had an existing usage as a Brothel up until the time the usage as a Brothel was discontinued in about November 2024 when the premises were offered for sale by auction. The current DA applicant Sheila Liew and associated interests purchased these premises prior to auction and the sale and purchase was settled on or about # January 2025.

These premises have not re-opened to operate as a Brothel since the sale continuing to date. This is more than 12 months, and is an “abandonment” of the use of 43 Albion Street as a Brothel.

The current DA D.2026/262 for 41 and 43 Albion Street seeks to obtain Consent for use of 41 Albion Street as a Brothel and to be combined with 43 Albion Street by knocking down an interior wall to consolidate both premises into a single Brothel. Problematically, the previous Consent for usage of 43 Albion Street as a Brothel has been “abandoned”.

As a consequence of the abandonment of the use of 43 Albion Street as a Brothel, it will be unlawful for Shiela Liew and associated interests to consolidate both 41 and 43 Albion Street for the purposes of operating both as a Brothel.

2. Clustering

If consent is granted to use 41 and 43 Albion Street as Brothel premises, there will be two Brothels operating side-by-side.

The application is skilfully presented as a single Brothel, using a common single entrance with internal access by demolition of an internal wall. This presentation involves a heavy smoke screen as there are two separate titles and two separate buildings which will be used as a Brothel.

The fact is the result, if consent is granted, will be two separate premises operating side-by-side which will be used as Brothel premises.

The changing neighbourhood character and social amenity of Surry Hills with increasing residential use by families is sensitive to an over-concentration and clustering of Brothels.

The grant of a DC for 41 and 43 Albion Street will result in strip development of Brothels along Albion Street, which has become a family residential area in the last 15 years.

The following tables demonstrate the “clustering” of Brothel operations in the vicinity of 41 and 43 Albion Street.

Table A – Existing authorised Brothels

Item	Operator	Address	Distance from 41 Albion Street
1	Sheila Lieu and associated interests	43 Albion Street previously operating as "ThaiCity 43" until about November 2024. 43 Albion Street has not been operating as a Brothel for more than 12 months though there it is advertising as "XCity Girl"	Adjoining
2	John Bitsikas and associated interests	99 Albion Street known as "Tiffany's Girls"	200 metres
3	Sheila Lieu and associated interests	204 - 206 Commonwealth Street known as "Kyoto 206"	75 metres
4	Shiela Lieu and associated interests	57 Reservoir Street known as "Sakura 57"	100 metres
5	Unknown	12 Bellevue Street known as "Bellevue 12"	150 metres

As can be seen in Table A, there is significant clustering of Brothels within 75 metres of 41 and 41 and 43 Albion Street, and extending out to 200m and 300 metres. To permit an additional Brothel to open at 41 Albion Street Surry Hills is a clear detriment to the social amenity of Surry Hills.

Clustering is undesirable

The clustering of Brothels in this immediate vicinity is undesirable, as it creates a "Brothel strip" image for the locality, and detracts from the local amenity of residents.

There is no doubt that the social fabric and amenity of Albion Street and the immediate vicinity has seen significant changes over the last 15 or so years since about 2010 with many of the old terraces which were previously used for business purposes being converted back to family residential use. The makeup of local families along Albion Street includes families with young children currently aged from 10 years to 17 years, and young adults aged from 18 years.

The character of this locality has changed from pre-dominantly mixed businesses to more than 50% now being used as residential premises.

Nuisance

The current clustering of Brothels has already resulted in a nuisance for local residents, which will increase if a DC is granted for 41 and 43 Albion Street.

There are already adverse amenity impacts on residential use caused by Brothel client increased traffic and parking in adjacent streets which is also contrary to City of Sydney Council policy to discourage the use of motor vehicles.

There is noise nuisance created by late night revellers on their way into the local Brothels, and undesirable late-night activity in Albion and adjoining streets.

There is a further nuisance for local residents created by confused Brothel patrons knocking on the doors of residential premises, asking to see the girls.

Several times a day, every day of the week, a worker can be seen and heard trundling a large blue bin up and down Commonwealth Lane and Albion Way, apparently for the purpose of collecting waste from Kyoto 206 and other nearby Brothel premises operated by Shiela Liew and associated interests. This is unsightly, noisy and a nuisance. It is also a breach of the Waste Management Plan procedures attached to the Development Application.

3. Expansion of existing Brothel operations into adjoining buildings

There is reason to believe, subject to confirmation following Council investigations, that Shiela Liew and associated interests have expanded existing Brothel premises into adjoining buildings, as described in Table B. This submission does not allege any unauthorised work at Kyoto 206 or 43 Albion Street, but notes that attempts to locate DAs and DCs for the purposes of this submission have been unsuccessful.

Table B – Expansion of Brothel operations

Item	Operator	Address	Distance from 41 Albion Street	Comment
6	Shiela Liew and associated interests	202 Commonwealth Street	75 metres	These premises at 202 Commonwealth Street have been the subject of a number of DAs in

				<p>the last 2 years or so, a Medical Centre and more recently as residential premises. Neither usage has ever eventuated.</p> <p>Instead, an internal and common wall was demolished between 202 and Kyoto 206 in 2025 to join the two premises together. A DA or DC for this work cannot be located.</p>
7	Shiela Lieu and associated interests	Rear of 43 Albion Street	Adjoining	<p>A ground floor extension was built at the rear of 43 Albion Street by the previous operator of "Thai City 43" with a rear access entry on Albion Way. It appears that this unapproved extension has been at least partially removed. A DA or DC for this work cannot be located.</p>

4. Inadequate plans

There are several plans attached to the DA which presumably seek to demonstrate that proper consideration has been given to relevant DCP issues: Plan of Management and Waste Management Plan.

However, these Plans consist of generalities and lack adequate detail to demonstrate any means of adherence to the matters therein. For example, the Waste Management Plan Plans does not adopt any of the testable features in ISO 9001 Total Quality Management, as there are no forms which will be used to record the matters set out in this Plan.

Relevantly, the Plan of Management is remarkable for the absence of anything concerning the welfare of the young Asian girls who will be providing their services by comparison to a great deal of detail concerning management of the customers.

Nothing in this submission is to be read as an express or implied allegation against Shiela Lieu and associated interests that they are in breach of any law.

However, there are several matters of community concern which are not addressed in the Plan of Management:

- the potential for trafficking and economic exploitation of young Asian girls to work in the sex industry;
- no procedures for recording any checks of the age of the sex workers, visa eligibility, number of work hours (there are strict limitations on work hours for student visas)
- well known concern voiced by University Vice-Chancellors about female students working in the sex industry to supplement their income.

5. Dilapidation

There are already authorised and historical Brothels located in the vicinity of 41 Albion Street such as “Tiffany’s Girls” at 99 Albion Street, and “A touch more class” (previously known as “A touch of class”) on Riley Street at the corner of Foveau Street.

Tiffany’s Girls is a long-standing legal adult services establishment which has operated in Surry Hills since 1974. It is often referred to locally as a “landmark” of the area and takes up the whole block, if the corner office building is included.

Tiffany’s Girls and A touch more class are both located in well-presented and maintained heritage buildings (Tiffany’s Girls is currently undergoing extensive renovation at an estimated cost of \$2 million).

A touch more class is also a centre of entertainment for the patrons of the Forrester Hotel located directly opposite, who unofficially time the entry and exit of clients to that Brothel.

There is not much that can be said about the appearance of the exterior of the Brothel at 12 Bellevue Street, but it does not have a dilapidated appearance.

By contrast, 43 Albion Street, which was recently purchased by Shiela Liew and associated interests in January 2025 has a dilapidated, overgrown, unsightly and decidedly “down market” appearance.

There is no doubt that 41 Albion Street will also take on the same down market and dilapidated appearance as 43 Albion Street. This proposition is supported by the ugly appearance of “Kyoto 206” Commonwealth Street operated by S Liew and associated interests. The 1960’s exterior brick work at the front is ugly and detracts from the appearance of the other residential and mixed use buildings in the immediate vicinity in Commonwealth Street. In 2025 an internal door visible from the street was installed on the first landing inside the open front door of Kyoto 206 on what local residents refer to as the “stairway to heaven”, which has an unfinished dirty, stained and unmaintained appearance.

In addition, the rear exterior of Kyoto 206 on Commonwealth Lane is dilapidated with concrete cancer, peeling render, unkempt weeds and accumulated rubbish. Commonwealth Lane is occasionally used as a rest area by the girls from Kyoto 206.

It is more probable than not, based on the lack of maintenance to date of the existing Brothel premises operated by S Liew and associated interests, that 41 Albion Street will soon take on the same dilapidated appearance as the other Brothel premises operated by them.

6. Loss of rental premises in rental crisis

Relevantly, two of the objectives of the *Environmental Planning And Assessment Act 1979* s1.3 - Objects of Act are:

The objects of this Act are as follows--

(a) to promote the social ... welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,

(b) to promote the supply, delivery and maintenance of housing, including affordable housing,

...

41 Albion Street was tenanted up to the time S Liew and associated interests purchased the premises in January 2025. There was a previous Development Consent to use these premises as a medical centre, but no evidence can be located that it ever operated as a medical centre.

The changing social fabric and amenity of Albion and adjacent streets from usage as businesses into residential usage has occurred over the last 15 years especially with more families taking up residence requires consideration of the social welfare of the families, especially families with young children. The change of use of 41 Albion Street from residential to a Brothel does not promote the social welfare of the residential community by proper management, development and conservation of these premises as a residential tenancy resource at a time of high demand for tenancies: s1.3(a).

A further issue concerns the loss of premises available for tenants in the current rental crisis. The current residential vacancy rate in Surry Hills is extremely tight in April 2026, estimated at approximately 0.78% with the lowest vacancy rate in inner-city Sydney. This rental market is characterized by high demand from renters, with about 51% of residents (mainly young professionals) renting. The removal of 41 Albion Street for use as residential housing is inconsistent with the object in s1.3(b).

In addition, there is expected to be an increased demand for rental premises in Surry Hills on completion of the Atlassian headquarters at Central Station known as "Atlassian Central" which is currently scheduled for practical completion in November 2026: see s1.3(b).

It is deplorable that this residential building has been withdrawn from the stock of rental premises when there is a rental crisis and high demand for rental premises in Surry Hills: see s1.3(b).

Conclusion

There is nothing that can be said in favour of the proposed DA for use of 41 Albion Street as a Brothel, including as an extension of the operation of the “abandoned” usage of 43 Albion Street as a Brothel, even if its usage as a Brothel has not be abandoned.

To grant Development Consent will also be inconsistent with the Objects of the Act.

On balance, the weight of the argument on each of the above grounds is resoundingly against grant of Development Consent for use of 41 and 43 Albion Street as a combined Brothel premises.

The Development Application should be refused.

Dated: 20 April 2026

On behalf of the Surry Hills Action Group (SHAG)

Attachment: Table of Objectors.

From: Sai Wah Wong wong <[REDACTED]> on behalf of Sai Wah Wong wong <[REDACTED]>
<[REDACTED]> <Sai Wah Wong wong <[REDACTED]>

Sent on: Monday, April 20, 2026 9:34:41 PM

To: dasubmissions@cityofsydney.nsw.gov.au

Subject: Submission - D/2026/262 - 41 Albion Street SURRY HILLS NSW 2010 - Attention Max Di Rosario

Caution: This email came from outside the organisation. Don't click links or open attachments unless you know the sender, and were expecting this email.

Dear council,

I write this email to express my objection to the extension of the existing sex services premises. I believe this extension will increase unnecessary foot traffic and vehicle traffic to the local area which does not provide any benefits for locals. By extending the existing premise, more motor vehicles would be parking in the area and less will be available for residents. As a resident of Surry Hills, it is very frustrating to finding parking along the streets of Albion and Commonwealth on weeknights after work; this extension will only exacerbate this issue. Furthermore, visitors of this premise often roam around the surrounding streets to smoke afterwards, at night time, this makes it very difficult to sleep with all the loud noise and poor air quality from the smoking. Therefore, I object to the extension.