

Response to Submissions

27 Railway Street, Corrimal

SSD-86131212



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Acknowledgment of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on. We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years. We pay our respects to First Nations Elders, past and present.

Urbis is committed to incorporating our respect for First Nations cultures, peoples and storytelling in our work across the Country. We are proud to have partnered with Darug Nation artist, **Hayley Pigram**, and to profile her artwork – **Sacred River Dreaming**.



The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

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1 Introduction

1.1 Overview

This Submissions Report has been prepared by Urbis Ltd (**Urbis**) on behalf of LEGPRO 70 PTY LTD ATF LEGPRO 70 UNIT TRUST ("**Legacy**") (**the Applicant**) to address the matters raised by public agencies, Wollongong City Council (Council), the community, and other relevant stakeholders throughout the public exhibition of State Significant Development Application SSD-86131212 (**the SSDA**) for the proposed subdivision and civil works at the former Corrimal Coke Works, located at 27 Railway Street, Corrimal (**the site**). This SSDA seeks consent for:

- Civil works, comprising roads, drainage, and stormwater infrastructure,
- Construction of the Central Park and the Southern Park; and
- Torrens subdivision to create nine (9) residential lots and public road reserves.

The SSDA was lodged with the Department of Planning, Housing and Infrastructure (**DPHI**) in February 2026 and was placed on public exhibition for 28 days between 27 February 2026 and 26 March 2026.

This SSDA was lodged concurrently with a separate (but interrelated) Stage 2a Built Form SSDA (SSD-83789711) which seeks development consent for the construction of four (4) residential flat buildings, providing a total of 206 x residential apartments (including 57 x affordable housing apartments).

By way of relevant background information, the Land and Environment Court approved bulk earthworks on the land to which this SSDA relates under the Stage 2–4 Bulk Earthworks DA (DA-2023/823). This consent approved earthworks, tree removal, early works, and remediation works. The earthworks approved by DA2023/823 establish the 'existing' ground levels for the purpose of future development of Stages 2 – 4.

This report has been prepared in accordance with the DPHI *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) March 2026*.

1.2 Exhibited Project

This SSDA (as originally submitted) sought development consent for:

- Detailed civil works associated with the construction of local roads and pavement works relevant to future Stages 2–4 built form. [**Note.** The proposed civil works will be enabled by the outcomes of the approved Stage 2 – 4 Bulk Earthworks and Vegetation Management DA (DA-2023/823)].
- Drainage and stormwater infrastructure works;
- Construction of the Central Park and the Southern Park (including embellishment works, lawn areas, landscaping, tree planting, equipment, and services);
- Construction of the on-site portion of the shared pedestrian–cycle path within the Stage 2–4 site boundaries;
- Public domain works (including landscaping, street tree planting, and street paving); and
- Torrens subdivision to create nine (9) residential lots (referred to as Lot 200, Lot 201, Lot 202, Lot 203, Lot 204, Lot 300, Lot 301, Lot 302, and Lot 303) and the public road reserves which will be dedicated to Council (referred to as 'Road 01', 'Road 03', 'Road 04', and 'Road 05').

1.3 Supporting Documentation

This Submissions Report is supported by the following technical reports and documentation.

Table 1 – Supporting Documentation

RTS Appendix	Report	Prepared By
Appendix A	Detailed Responses to Council Submission	Urbis
Appendix B	Updated Mitigation Measures	Urbis
Appendix C	TfNSW Response Letter	Bitzios
Appendix D	Revised BDAR Waiver Request (dated 7 May 2026)	Eco Logical Australia
Appendix E	Revised Civil Works Plans	Maker
Appendix F	Revised Plan of Subdivision	SDG
Appendix G	Civil Design Verification Statement	Maker Engineering
Appendix H	Landscape Design Package – Central Park	Clouston Associates
Appendix I	Landscape Design Package – Stage 2-4 Streetscape	Clouston Associates
Appendix J	Landscape Design Package – Southern Park	Clouston Associates
Appendix K	Historical Archaeology Response	Urbis Heritage

2 Analysis of Submissions

This section provides a summary of the submissions received including a breakdown of respondent type, the nature of the submission, and the total number of submissions.

All submissions were managed by DPHI, including the registration and uploading to the Major Projects Portal.

2.1 Breakdown of Submissions

The SSDA was publicly exhibited between 27 February 2026 and 26 March 2026.

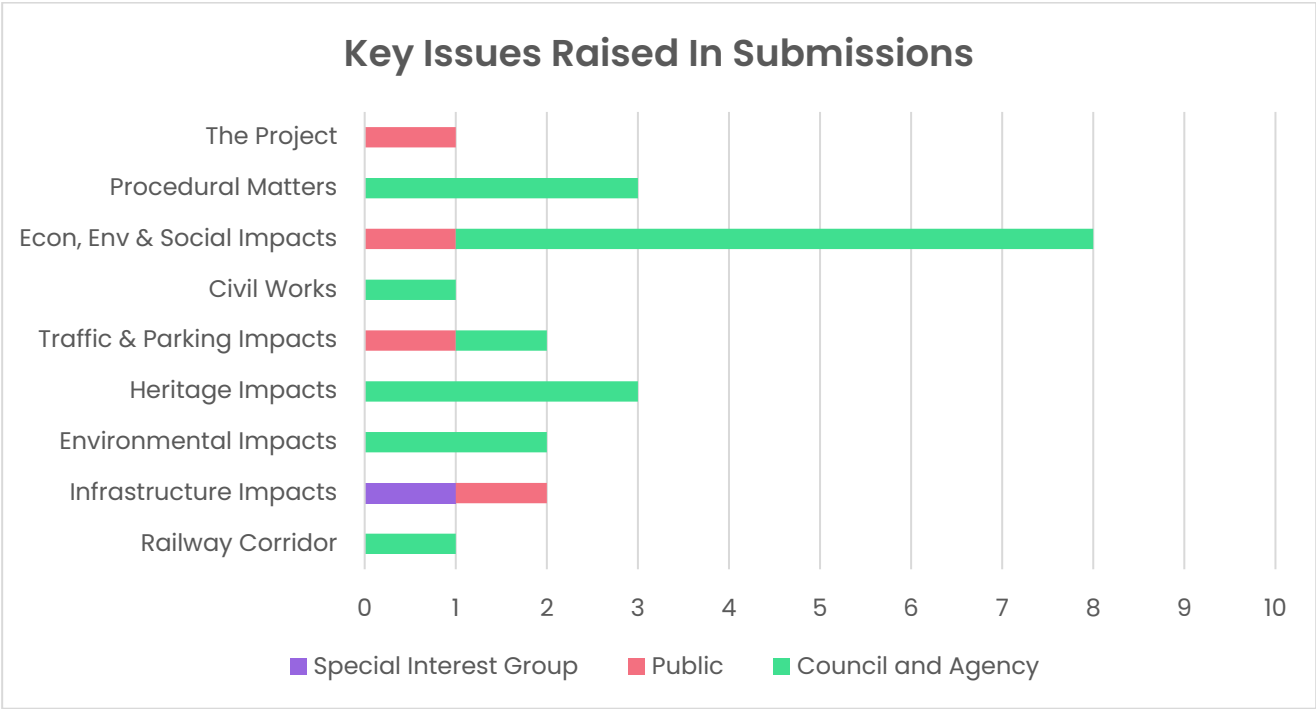
A total of 11 submissions received during and immediately following the exhibition period. These comprised:

- One (1) submission from Wollongong City Council
- Eight (8) submissions from public agencies
- One (1) submission from a member of the local community
- One (1) submission from a special interest group

The submission from a member of the local community objected to the project. The Council and agency submissions provided comments, recommended conditions, and suggestions for alterations to the proposed development to ensure compliance with applicable environmental planning instruments. The special interest group also provided comment and recommended conditions of consent.

A response to the agency, special interest group and public submission is provided in **Section 4**, the detailed response to Council is provided at **Appendix A**.

Table 1 Key Issues Raised in Submissions



The table below provides a summary of the submissions received and their breakdown.

Table 2 Summary of Public Submissions

Source	Position	Number of Submissions
Council & Agency: Wollongong Council, TfNSW, Heritage NSW (Aboriginal Cultural Heritage), Heritage NSW, DCEEW Water Group, NSW Environment Protection Authority, DCEEW CPHR, Sydney Trains, Sydney Water.	Neutral / Comment	9 x
Public & Community Interest Group Submissions Endeavour Energy, Community Member.	Neutral / Comment	1 x
	Object	1 x

2.2 Categorisation of Submissions

The key issues raised in the submissions are outlined in **Table 3** below.

Table 3 Categorisation of Submissions

Issue	Raised By
Staging, Sequencing, and Consistency with Approved Consents	Wollongong City Council TfNSW
Traffic, Access, and Cumulative Transport Impacts	Wollongong City Council TfNSW Community member
Road Design, Pedestrian Connectivity and Public Domain	Wollongong City Council
Rail Corridor Protection and Interface	Sydney Trains TfNSW
Stormwater, Flooding, Riparian, and Water Management	Wollongong City Council DCEEW Water Group DCEEW CPHR
Biodiversity and Threatened Species Impacts	Wollongong City Council DCEEW CPHR
Aboriginal and Non-Aboriginal Heritage	Heritage NSW (Aboriginal Cultural Heritage) Heritage NSW Wollongong City Council
Utilities and Services Coordination	Sydney Water Endeavour Energy
Environmental Management and Contamination	Wollongong City Council NSW EPA (noted)

3 Actions Taken Since Exhibition

In response to the key issues raised within the submissions, minor design refinements and clarifications have been made to the proposed development since public exhibition.

This section summarises the changes that have been made to the project since its public exhibition

3.1 Refinements to the Project

In direct response to matters raised during exhibition, a range of refinements and clarifications have been made to the project. Importantly, these changes do not alter the scope of the SSDA or the nature of development consent being sought. Rather, these refinements have been made to improve clarity, consistency, and alignment with previously approved outcomes and relevant agency requirements.

The key refinements made since exhibition are outlined below.

3.1.1 Riparian Corridor Alignment and Waterfront Land

The civil design has been updated to align the riparian corridor and creek linework with the approved Stage 2-4 Bulk Earthworks DA (DA-2023/823). These updates minimise encroachment into the vegetated riparian zone and now reflect the previously approved creek realignment and riparian management framework.

The revised design ensures that no works are proposed within the inner riparian zone. A minor and limited encroachment into the outer vegetated riparian zone remains as a result of detailed design refinements that improve bank stability. The proposal has been reviewed for consistency with the existing Controlled Activity Approval, with any further approvals, to be progressed separately prior to construction (as required).

3.1.2 Biodiversity and Ecological Management

Eco Logical Australia has prepared a revised BDAR Waiver Request (**Appendix D**) for the Stage 2-4 civil works scope. The revised BDAR Waiver Request (dated 7 May 2026) includes updated mapping reflective of the extent of the works proposed by this SSDA. Additionally, the revised BDAR Waiver Request clarifies how the proposal responds to existing biodiversity approvals and site-wide ecological management frameworks under previous development consents.

Biodiversity mitigation measures have been consolidated and clearly referenced from previously prepared BDAR Waiver Requests and endorsed site-specific assessments and management plans, in relation to vegetation management, threatened species, and Grey-headed Flying-fox management. These updates clarify how ecological impacts associated with the Stage 2-4 civil works will be managed within the established approval framework, with any outstanding agency matters to be resolved through the ongoing assessment process. The complete list of mitigation measures is provided at **Appendix B** and **Appendix D**.

3.1.3 Proposed Subdivision

On 1 December 2025, Council approved a development application for the paper subdivision of the former Corrimal Coke Works site to create eight (8) new Torrens Title lots (DA-2025/388). The new proposed lots were described as Lots 1-8 in DP1313981. At the time of the subject SSDA lodgement (February 2026), a Subdivision Certificate for the new Torrens Title lots created by DA-2025/388 had been submitted to NSW Land Registry Services for registration. The new Torrens Title lots approved by DA-2025/388 have since been registered. Accordingly, the legal property description of the land to which the subject SSDA relates has been amended. For completeness, **Table 4** below provides a revised description of the land to which the SSDA relates. [**Note. Table 4** supersedes Table 6 of the EIS as originally submitted with the SSDA].

Table 4 Site and Locality Description

Characteristic	Description
Key Site Features	
Country	Dharawal Country
Site Name	Corrimal Coke Works
Address	27 Railway Street, Corrimal
Legal Description	The legal property description of the former Corrimal Coke Works site is Lot 126 DP598190, 101 DP1301632, 103 DP1301632, Lot 3 DP1313981, Lot 4 DP1313981, Lot 5 DP1313981, Lot 6 DP1313981, Lot 7 DP1313981, and Lot 8 DP1313981. These allotments are identified in purple below. The lots subject to this SSD are referred to as Lot 3 DP1313981, Lot 4 DP1313981, Lot 5 DP1313981, Lot 6 DP1313981, Lot 7 DP1313981, and Lot 8 DP1313981. These lots are annotated in red below.

Figure 1 Site Context Map



Source: Urbis Ltd

Zoning	R3 Medium Density Residential, E1 Public Recreation
Existing Use / Structures	Existing features across the Corrimal Coke Works site are as follow: - Structures and infrastructure associated with the former coke work production have been demolished under the Demolition DA (DA-2022/1249). - Towradgi Creek forms the southern boundary of the site and drains in a west to east direction. A tributary of the Creek traverses the site. The western portion of the site is occupied by scattered bush and stockpiling areas. Separate development applications (DAs) have been lodged to Wollongong City Council, and either have been determined or are under assessment. These DAs

Characteristic	Description
	relate to subdivision, Stage 1 built form, bulk earthworks, and tree / vegetation management.
Site Area	The site of the Stage 2–4 Civil Works SSDA is 66,226 sqm and comprises Lot 3 DP1313981, Lot 4 DP1313981, Lot 5 DP1313981, Lot 6 DP1313981, Lot 7 DP1313981, and Lot 8 DP1313981 (see Figure 1 above). More broadly, the area of the Corrimal Coke Works site is 18.2 hectares.
Number of pre-existing dwellings on site	- Zero (0) existing dwellings 179 x residential apartments approved under the Stage 1 Built Form DA–2023/550.
Site Frontage	The Corrimal Coke Works site has a frontage to Railway Street to the north.
Vehicular/Site Access	An internal road network will be delivered as part of the Stage 1 Built Form approval, which provides a connection to Railway Street. The internal road network will be extended across the wider Corrimal Coke Works site, subject to the internal roads proposed under the subject Stage 2–4 Civil Works SSDA.
Local Context	The site has an irregular rectangular configuration and is bounded by: - East boundary: main southern railway line (Corrimal Train Station) - West boundary: dual carriageway (Memorial Drive) - North boundary: Railway Street - South boundary: Towradgi Creek
Regional Context	The site is approximately 1km to the east of the Corrimal Town Centre. Corrimal is approximately 6.5 kilometres north of Wollongong City Centre. The site is located within close proximity to education and recreation facilities, including the Corrimal High School, Corrimal East Public School, Robert Ziems Park, Corrimal Memorial Park, Towradgi Beach Park, and Bowls and Recreation Club.
Topography	The site has a generally flat topography, gently undulating to the south.
Vegetation	As part of the Stage 2–4 Bulk Earthworks approval (DA-2023/823), a Tree Removal and Retention Plan, Arboricultural Impact Assessment, and associated management plans addressing specific threatened species were prepared and approved. The consent to DA-2023/823 resolved vegetation management and clearing requirements for the site. Accordingly, the Stage 2–4 Civil Works area will be cleared in accordance with the consent to DA-2023/823. The Arborist Report submitted with the original SSDA (Appendix S) confirms that no further tree removal is required under this SSDA.
Heritage	Part of the site is subject to the following heritage listings: - Local heritage listing in the Wollongong LEP 2009 (ID 6607) - State heritage listing on State Heritage Register in the NSW Heritage Act 1977
Aboriginal Archaeology	As part of the Stage 2–4 Bulk Earthworks approval (DA-2023/823), an Aboriginal Cultural Heritage Assessment was undertaken, including survey, test excavation, and consultation with the Aboriginal community. Test excavation confirmed one

Characteristic	Description
	Aboriginal archaeological site: FCCW AFT 1 (AHIMS 52-2-4504). AHIP 5141 was granted by Heritage NSW on 3 August 2023, permitting harm to Aboriginal objects associated with this site. All identified Aboriginal objects have been managed under AHIP 5141. Works proposed by this SSDA are not expected to result in any additional impacts to Aboriginal cultural heritage values.
Acid Sulfate Soils	The site contains predominantly Class 5 Acid Sulfate Soils, with a small portion of the southeastern corner identified as Class 3. The land subject to this SSDA is identified with Class 5 soils. An Acid Sulfate Soils Management Plan was approved by the Stage 2-4 Bulk Earthworks DA consent (DA-2023/823) and is submitted at Appendix Q of the original SSD package.
Contamination	A consolidated Detailed Site Investigation (DSI) was submitted with the Stage 2-4 Bulk Earthworks DA (DA-2023/823). The DSI, together with the associated Remedial Action Plans (RAPs), provides for the remediation of identified contamination prior to commencement of the Stage 2 -4 civil works, as proposed by the subject SSDA. For the subject SSDA, Reditus has prepared a supporting letter (Appendix K) confirming that the consolidated DSI satisfies the relevant requirements of SEARs 13 and is appropriate to support the proposed development.
Surrounding Locality	
Public Transport	The site is highly accessible via public transport. Corrimal Train station directly adjacent to the site at the east. Bus stops are located along Railway Street.
Major Roads	Memorial Drive is located to the sites western boundary which is a State classified road, and a major traffic corridor. Memorial Drive is a 4 lane, two-way road.
Open Space	▪ Corrimal Memorial Park – approximately 400m northwest of the site. ▪ Phil Adams Park – approximately 500m to the east of the site. ▪ Ziems Park – approximately 650m to the west of the site.
Social Infrastructure (Schools/Hospitals etc.)	Key social infrastructure located within proximity to the site includes: ▪ Corrimal Public School (Primary) ▪ Corrimal East Public School ▪ Corrimal Highschool (Secondary) ▪ Goodstart Early Learning Centre Corrimal ▪ KU Corrimal East Preschool ▪ Corrimal Family Medical ▪ East Corrimal Medical Centre ▪ Wollongong Medicare Urgent Care Clinic ▪ Illawarra Diggers Aged & Community Care

3.1.4 Central Park and Southern Park

The design of the Central Park and Southern Park has been further refined in response to comments from Council and agencies. The changes focus on resolving specific design conflicts, improving usability and safety, and providing clearer documentation of how the two parks will function and be delivered.

Key changes made to the Central Park and Southern Park following the public exhibition are:

- Resolution of the design conflict in the Southern Park between the amphitheatre and the vehicle turning head, including the introduction of reinforced turf to accommodate infrequent maintenance and emergency vehicle access without undermining the public-realm function of the space.
- Provision of additional fixed seating and picnic shelters within the Central Park and Southern Park to improve comfort, supervision opportunities and day-to-day usability.
- Details of nature-play mulch type, depth, and specifications for play areas, consistent with public safety and maintenance requirements, and clarification that sand will not be used as a softfall material.
- Refinement and clarification of retaining wall locations, heights and typologies, including sandstone sleeper walls where visible to the public realm, and coordination of fencing where required for safety.
- Clarification and refinement of lighting strategies for the two parks, including wildlife-sensitive lighting in the Southern Park to minimise impacts on the Grey-headed Flying-fox camp, and confirmation of vandal-resistant and maintainable lighting approaches.

3.1.5 Streetscape and Road Design

The streetscape and road design has been reviewed and refined to address matters raised by Council and to improve pedestrian safety, accessibility, and coordination between civil and landscape elements.

Key changes and clarifications made since exhibition include:

- Additional pram ramps at intersections to improve pedestrian connectivity and accessibility.
- Verification of footpath widths and clearances, with minor localised adjustments made where required to address compliance and coordination with fencing.
- Refinement of street tree locations to resolve conflicts with driveways, intersections, lighting, utilities and stormwater infrastructure.
- Update of street tree species selections to align with Council's preferred street tree species.
- Coordination between civil engineering and landscape plans to provide consistent documentation.

4 Response to Submissions

A detailed response to matters raised in the submissions received during and immediately preceding the exhibition period is provided in **Table 5**. Detail responses to the matters raised by Wollongong City Council are provided in **Appendix A**.

Table 5 Response to Agency Submissions

Summary of Submission	Response	Appendix
Transport for NSW		
Contribution to Road Network Infrastructure. Provide details outlining how the developer will contribute to the broader road network infrastructure upgrades required to mitigate the impacts of the proposed development.	The SSD seeks development for civil works and subdivision only. The works are limited to roads, drainage, stormwater infrastructure and open space, and do not seek consent for the construction or occupation of any dwellings. Accordingly, the proposed civil works will not generate any additional operational traffic on the surrounding road network. The Traffic Impact Assessment (at Appendix C) confirms that the proposed civil works do not generate operational traffic and are limited to short-term construction traffic only. The Assessment anticipates a maximum 60 heavy vehicle movements per day, which are temporary, low in volume, and capable of being accommodated within the existing State and local road network without requiring upgrades or mitigation works. TfNSW's comments regarding road network upgrades relate to the ultimate delivery of the master plan and increased dwelling yield. These outcomes are not enabled by the civil works application and will arise only through future built form development applications, including the concurrent Built Form SSDA. Contributions towards broader road network infrastructure upgrades required to support the ultimate development were worked through with TfNSW via the State Planning Agreement associated with the Stage 1 built form development consent (DA-2023/550).. Operational traffic impacts associated with future stages will be assessed as part of the respective development applications (for instance the concurrent Stage 2a built form SSDA), with each development application to be subject to the Housing Productivity Contribution As this development application does not result in gross floor area, there is no requirement for a Housing Productivity Contribution.	Appendix C

On this basis, no additional road network upgrades or contributions are triggered by the proposed civil works, and the application can be supported from a traffic and transport perspective.

Heritage NSW – Aboriginal Cultural Heritage

The EIS confirms that sewer upgrade works under AHIP 5141 are complete, with overlap identified within the Stage 2–4 Early Stage Civil Works area. While Aboriginal sites have been recorded nearby in relation to AHIP 5141, the current information does not demonstrate that all potential impacts overlapping the Stage 2–4 site have been fully assessed. Additional information is required to demonstrate that the Secretary’s Environmental Assessment Requirements for Aboriginal Cultural Heritage have been adequately addressed.

Aboriginal cultural heritage across the broader Corrimal Coke Works site has been the subject of extensive investigation. Two Aboriginal Cultural Heritage Assessment Reports (**ACHARs**) have been prepared for the development. These include:

- An ACHAR for the entire site (dated 28 February 2023); and
- An Amended ACHAR specific to the sewer upgrade works (dated May 2023).

These assessments were undertaken in accordance with the *Heritage NSW Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (2011) and were informed by Aboriginal community consultation consistent with Heritage NSW requirements.

The ACHAR (dated 28 February 2023) concluded that, with the exception of the identified archaeological site AHIMS 52-3-4505, an AHIP is not required for the remainder of the study area. The Amended ACHAR (dated May 2023) specifically addressed impacts associated with the sewer upgrade works, for which AHIP 5141 was issued and has since been completed. Figures included in the EIS identify the extent of the AHIP area and its partial overlap with the land to which the Stage 2–4 Civil Works SSDA relates.

Based on previous assessments and supporting documentation, Aboriginal cultural heritage impacts within the land to which the Stage 2–4 Civil Works SSDA relates have been appropriately investigated and are either covered by AHIP-approved works or occur in areas where no further impacts to Aboriginal objects are anticipated. Any future works with the potential to impact Aboriginal cultural heritage will be subject to further assessment and approval under the relevant legislative framework (as required), including any unexpected finds protocols.

Heritage NSW

Demonstrate adequate consideration of historical archaeology by providing the following information:

- a. The archaeological potential within the Stage 2–4 Early Stage Civil Works area.
- b. Approved impacts and mitigation measures.
- c. The status of archaeological investigations.
- d. Whether additional impacts are expected as part of Stage 2–4 works.

In response to the items raised by Heritage NSW, the following is noted:

Appendix K

- a. Now that both test and salvage excavation are complete and development is substantially underway, the key archaeological features at the study site have been removed. Of the coke oven and flue system, all that remains are those elements intentionally conserved. Despite extensive testing, little in situ evidence of the tramway survived. Further, it is now considered to have nil archaeological potential. The remainder of the site may yet yield unexpected archaeological finds in the form of unmapped features related to its use as a coke works (refer to figure at **Appendix K**).
- b. Impacts associated with the SSDA can proceed in accordance with the unexpected Finds Procedure.
- c. As per response to ‘a’ above.
- d. No additional impacts are expected as part of the Stage 2–4 civil works. There is low potential for unmapped features within the s140 boundary (HMS ID 6162).

Refer to the cover letter prepared by Urbis (**Appendix K**).

Department of Climate Change, Energy, the Environment and Water – (DCCEEW) Water Group

The following information must be provided:

1. Revise the layout to remove works from the vegetated riparian zone of North Corrimal Creek.
2. Review the project for consistency with a Controlled Activity Approval issued for the site.

The civil engineering drawings have been updated to align the riparian corridor linework with the approved Stage 2–4 Bulk Earthworks DA (DA-2023/823). The revised plans minimise encroachment into the riparian corridor and reflect the previously approved creek realignment and vegetation management framework.

A minor encroachment into the outer vegetated riparian zone remains. This encroachment is limited in extent and results from detailed design refinements, including a slight adjustment to the creek alignment to improve bank stability on the western side of North Corrimal Creek. Importantly, no works are proposed by the subject SSDA within the inner riparian zone.

Appendix E

The proposed civil works have been reviewed against the existing Controlled Activity Approval (CAA) issued under the Water Management Act 2000 for the creek realignment works. The intent, outcomes and environmental protections established by the approved CAA are maintained. Should DCCEEW determine that a formal amendment to the existing CAA is required to reflect the detailed design refinements, this will be progressed separately in consultation with DCCEEW prior to the carrying out of relevant civil works.

All works on waterfront land will be designed and constructed in accordance with the *Guidelines for Controlled Activities on Waterfront Land* (DCCEEW, 2025), including appropriate mitigation, stabilisation and revegetation measures.

The proposal is considered to be consistent with the approved riparian management framework, with any residual matters capable of being appropriately managed through existing regulatory processes.

NSW Environment Protection Authority

No comment on the proposal.

Noted

N/A

DCCEEW – Conservation Programs, Heritage and Regulation Group

The following issues are identified and must be addressed: 1. The proposal is inconsistent with the existing BDAR Waiver and is required to be addressed.	Eco Logical Australia has prepared a revised BDAR Waiver Request which resolves the inconsistencies with the proposed civil works and the original BDAR Waiver. [Refer Appendix D].	Appendix D
2. Provide additional documentation to demonstrate how this SSDA satisfies all biodiversity conditions imposed under DA-2023/823.	The revised BDAR Waiver Request addresses the biodiversity conditions of under the Stage 2-4 Bulk Earthworks DA-2023/823: <i>The subject land, including the study area impacted by Stage 2-4 Early Stage (Civil) Works (SSD-86131212) has been subject to considerable historical clearing to facilitate its previous use as the Coke Works. The native vegetation that has since been planted offers limited habitat potential for threatened species and is a small patch of vegetation amidst a broader urban area that has been fragmented due to roads and housing. Vegetation within the study area has been approved for clearance under the Stage 2-4 Bulk Earthworks (BEW) DA-2023/823. Therefore, no vegetation removal or biodiversity impacts are proposed under the Stage 2-4 Early Stage (Civil) Works (SSD-86131212). This is under the assumption that all clearing will be carried out under the BEW Development Application (DA) and will be complete prior to this SSDA consent being enacted.</i>	Appendix D

3. Provide discussion and mitigation measures for indirect impacts to threatened fauna and flora.	The revised BDAR Waiver Request (Appendix D) includes mitigation measures. These mitigation measures have been drawn from the site-specific assessments and management plans, and include: ▪ Corrimal Cokeworks Site Wide BDAR – Version 7 (ELA) (dated 24 September 2024) (A2) ▪ Corrimal Residential Development Grey-headed Flying-fox Management Plan – Version 7 (ELA) (dated 24 September 2024) (A3) ▪ Corrimal Cokeworks Vegetation Management Plan (ELA) (dated 25 September 2024) (A4) ▪ Threatened Species Licence (DOC24/644921-3) (A5) The reporting concludes that the implementation of the recommended mitigation measures will result in a development that is unlikely to have a significant impact on native vegetation, the GHFF camp, and any existing riparian areas within the site. The complete list of mitigation measures is provided at Appendix B and Appendix D.	Appendix B Appendix D
4. The proposal does not address Chapter 2 of the Resilience and Hazards SEPP 2021 and is required to be addressed.	The relevant sections of the Hazards SEPP 2021, Chapter 2 is addressed below. Chapter 2 of the SEPP aims to promote an integrated and co-ordinated approach to land use planning in the coastal zone in a manner consistent with the objects of the Coastal Management Act 2016. The land to which the SSDA relates is identified within the 'Coastal Environment Area' and 'Coastal Use Area'. Relevantly, Clause 2.10 provides that development consent must not be granted to development on land within the coastal environment area unless the consent authority is satisfied that the development is designed, sited, and will be managed to avoid adverse impacts or is managed to minimise impacts. The Stage 2-4 Bulk Earthworks DA-2023/823 was accompanied by a Water Cycle Management Statement to assess potential flood impacts of the approved development. Key findings are summarised as follows: ▪ The channel in-flood function and overall affectation associated with the approved works is limited to the realigned creek channel. There are no adverse impacts within the areas identified for future residential use. ▪ The approved realignment of the creek results in a positive impact on flood behaviour. Flooding is confined to the newly formed creek, thereby reducing flooding through the central developable portion of the site. The approved	N/A

works have a neutral or beneficial impact on flooding on surrounding properties.

- All five approved local roads are flood free and provide substantial flood-free island above the PMF level, consistent with the controls for the Towradgi Creek Floodplain. These roads provide satisfactory evacuation in the event of a flood. The site provides significant refuge areas in all flood events (including PMF). External to the site, flood-free evacuation routes are available east along Railway Street.
- The approved development has been designed to remain viable in the long term by incorporating consideration of climate change. The assumed climate change impacts were found to be relatively small (<0.10 m) on peak flood levels along North Corrimal Creek for both the 0.5% AEP and 0.2% AEP events. More notable differences in peak levels were identified along Towradgi Creek between the 1% AEP basement design event and the 0.5% and 0.2% AEP events; however, these do not result in any significant change to flood extents.
- The approved development does not result in any increased risk to life. Overall, the development results in a reduction in flood risk across some flood fringe areas suitable for development. The realignment of North Corrimal Creek also establishes a defined waterway corridor.
- The approved creek realignment has been designed in accordance with recommendations from a qualified geomorphologist, with consideration given to erosion, riparian revegetation, and the overall stability of the watercourse.
- The flood impact study was prepared in accordance with the requirements of Council's DCP (Chapter E13) to assess flooding impacts of the approved development. The study models the 1% AEP, 10% AEP and PMF flood events, maps flood impacts, and identifies flood risk precincts.
- The approved development aligns with the floodplain context and delivers a restored creek corridor without introducing significant new flood hazards.
- Subsequent built form development within Stages 2–4 is restricted to areas outside the PMF extents.
- The approved creek realignment ensures there is no loss of floodplain storage across a range of flood events.

The subject Stage 2–4 Civil Works SSDA is enabled by the outcomes of the approved Stage 2 – 4 Bulk Earthworks and Vegetation Management DA (DA-2023/823).

Therefore the above outcomes of the Water Cycle Management Statement demonstrate alignment with the requirements of Clause 2.10 above.

Clause 2.11 applies to development on land within the coastal use area and requires the consent authority to consider a range of potential impacts on public access, amenity, heritage and the coastal setting, and to be satisfied that any such impacts are avoided, minimised or mitigated through the design, siting and management of the development. In response to this clause, the following is noted:

- The site and proposed works are not located on the foreshore, beach, headland or rock platform therefore will have no impact on members of the public, including persons with a disability.
- The proposal does not involve the delivery of any built form works and therefore there will be no overshadowing, wind funnelling, or loss of views from public places to foreshores.
- The proposal does not involve the delivery of any built form works and therefore will have no impact on the visual amenity and scenic qualities of the coast, including coastal headlands.
- The site is supported by several Aboriginal cultural heritage investigations which confirm Aboriginal cultural heritage impacts within the land to which the SSDA relates have been appropriately investigated and are either covered by AHIP-approved works or occur in areas where no further impacts to Aboriginal objects are anticipated. For complete details refer to the following:
 - An ACHAR for the entire site (dated 28 February 2023); and
 - An Amended ACHAR specific to the sewer upgrade works (dated May 2023).
- The Stage 2–4 Civil Works involve public domain upgrades, parks, roads, drainage, landscaping, services installation and paper subdivision only.
 - No new buildings, structures, or alterations to heritage fabric are proposed.
 - No works physically interface with, modify, or remove any heritage-listed fabric or significant relics.
 - The character and setting of the heritage items are not directly altered by the proposed civil works.
- Given the absence of built form or works affecting above-ground heritage fabric, the level of heritage impact is inherently low.

The proposed development achieves a suitable outcome in the context of Clause 2.11 of the Hazards SEPP 2021.

5. Provide further information to clarify that the road layout in this SSDA is consistent with the approved Stage 2-4 Bulk earthworks DA (DA-2023/823), Councils LEP requirements for riparian lands (Section 7.6) and DCP Chapters E23 and D19.	The final excavation and ground levels approved under the Stage 2-4 Bulk Earthworks DA (DA-2023/823) set the new existing ground levels for the basement levels and built form proposed by the concurrent Stage 2a Built Form DA (SSD-83789711). Coordination between the subject SSDA and the approved Stage 2-4 Bulk Earthworks DA has been maintained in the civil works drawings (at Appendix E).	Appendix E
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Sydney Trains

Please confirm if there is a proposed connection from the subject site and to Corrimal Train Station. If so, please provide landowner's consent allowing access across this Transport asset.	The proposed SSD does not seek approval for, nor include a connection between the subject site and Corrimal Train Station. Accordingly, no works are proposed within Transport for NSW land, and no landowner consent is required as part of this application. A future connection to Corrimal Train Station is proposed as part of the Heritage Plaza DA, which is currently under assessment by Wollongong City Council (DA-2023/840). Any access arrangements and required landowner consent(s) will be addressed and resolved as part of the Heritage Plaza DA.	N/A
Please see the conditions provided.	The applicant has reviewed and agrees in principle to the draft conditions proposed by Sydney Trains.	N/A

Sydney Water

This submission recommends conditions relating to water and wastewater servicing.	The applicant has reviewed and agrees in principle to the draft conditions proposed by Sydney Water.	N/A
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Public Submissions

The submitter objected to the proposed development on the basis that existing road infrastructure, particularly Railway Street, is already operating beyond capacity and cannot accommodate further traffic. Railway Street is the sole access and egress point for both the existing Corrimal Coke Works development and the proposed additional 207 apartments, on top of approximately 550 dwellings already under construction in Stage 1. Based on recent census data on car ownership in Corrimal, the development is expected to generate at least 750 additional vehicles. Railway Street also services the town centre, local	The subject Stage 2-4 Civil Works SSDA does not seek approval for any new dwellings. Residential development is proposed by the concurrent Stage 2a Built Form SSDA (SSD-83789711). Accordingly, the traffic concerns raised in this submission are noted and will be considered as part of the assessment of the Stage 2a Built Form SSDA.	N/A
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businesses, sporting events at Ziems Park and a childcare centre currently under construction, further compounding existing traffic pressures.

Increasing extreme weather events create more traffic hazards, limiting access to Railway Street as well as adding additional strain on existing infrastructure.

5 Updated Project Justification

This section provides an updated justification and evaluation of the project as a whole.

5.1 Project Design

The Stage 2–4 civil works continue to deliver the essential infrastructure, public domain, and subdivision works needed to support the concurrent Stage 2a Built Form SSDA and the future development of Stages 3 and 4 of the Corrimal Coke Works Precinct. As an enabling phase of the approved masterplan, the works establish the structural framework for a connected, resilient, and culturally responsive neighbourhood.

The Central Park, at approximately 0.3 hectares, will be the precinct’s primary neighbourhood park, framed by future residential buildings and designed for passive recreation, play, and community gathering. The Southern Park, at 1.15 hectares within a wider 7-hectare open space area, will provide nature play, community gardens, amphitheatre seating, and culturally significant planting along the realigned North Corrimal Creek.

The future construction of the shared pedestrian–cycle path will link these spaces to the broader Corrimal cycling network, with bridge and boardwalk structures providing safe creek crossings.

The new internal road network will provide safe and legible access for vehicles, pedestrians, and cyclists, supported by underground services, stormwater drainage, and street tree planting. Water sensitive urban design (**WSUD**) measures, including bioretention basins and rain gardens, will improve water quality, manage flows and enhance landscape resilience.

The proposed Torrens title lots will enable the orderly staging of future residential and retail development.

The public domain and landscape works have been informed by Connecting with Country engagement, embedding Dharawal cultural narratives and the site’s industrial heritage into the design. Native Illawarra species will be prioritised in planting, with interpretive elements reinforcing the precinct’s identity. Through its coordinated layout, high-quality open spaces and cultural integration, the proposed civil works will deliver early public benefits and set the foundation for a vibrant and liveable new community in Corrimal.

5.2 Strategic Context

The strategic planning context for the Stage 2–4 Civil Works SSDA remains unchanged from that detailed in the EIS. Whilst the civil works do not directly deliver residential dwellings, they play a critical enabling role in supporting housing supply, including affordable housing, through the provision of essential infrastructure and public domain works.

The proposal continues to align with State and local strategic planning objectives, including the National Housing Accord, NSW Housing Strategy, Illawarra–Shoalhaven Regional Plan 2041, and Wollongong’s strategic planning framework. By facilitating the timely delivery of infrastructure, open space and movement networks in a well-located precinct, the proposal supports transit-oriented development and broader urban renewal.

5.3 Statutory Planning Consistency

The statutory planning framework applicable to the proposal remains unchanged. The Stage 2–4 Civil Works SSDA is permissible with consent and capable of satisfying the relevant requirements of the Environmental Planning and Assessment Act 1979 (**EP&A Act**), applicable State Environmental Planning Policies (**SEPPs**), and the Wollongong Local Environmental Plan 2009 (**LEP**). The refinements and clarifications made to the scope of the SSDA do not alter the compliance position outlined in the original EIS. The civil works continue to respond appropriately to relevant statutory controls and no new variations to development standards are proposed.

5.4 Community Views

Community and agency submissions received during the public exhibition of the Stage 2–4 Civil Works SSDA are addressed in Section 4 of this Response to Submissions Report. The refinements and clarifications respond to matters raised in submissions by providing additional information and confirmation regarding the delivery of civil infrastructure, public open space, and environmental management. These changes do not result in any new or different impacts beyond those already assessed in the exhibited EIS.

5.5 Likely Impacts of the Proposal

The likely environmental, social, and economic impacts of the Stage 2–4 Civil Works SSDA remain consistent with those assessed in the original EIS. The proposal comprises enabling infrastructure works, public domain improvements and subdivision, with impacts associated with construction activities, traffic, noise, water management and ecology already comprehensively assessed. The refinements and clarifications do not result in any additional environmental impacts. Where relevant, they introduce or confirm measures to ensure that previously identified impacts are appropriately managed during construction and operation.

An updated table of proposed mitigation measures is provided at **Appendix B**, having regard to the economic, environmental, and social impacts of the proposal. These measures consolidate and clarify the mitigation framework assessed in the EIS. Subject to their implementation, the proposal is not expected to result in any significant adverse impacts.

5.6 Suitability of the Site

The site remains highly suitable for the proposed Stage 2–4 Civil Works, as previously demonstrated in the original EIS. The refinements and clarifications do not alter the strategic role of the land, its zoning or its ability to accommodate the proposed civil, servicing and public domain works.

The land to which the SSDA relates forms part of the Corrimal Coke Works renewal precinct and is identified for comprehensive redevelopment to deliver housing, open space, and supporting infrastructure. The subject civil works SSDA represents an essential enabling phase of this renewal and establishes the infrastructure framework necessary to support current and future built form stages.

The site is zoned R3 Medium Density Residential, where roads, recreation areas, and associated infrastructure are permissible with consent and consistent with the zone objectives. The proposal delivers essential servicing, road and subdivision works to facilitate the orderly and staged development of the precinct.

The site is well connected to Corrimal Train Station, surrounding road networks and local services, supporting accessibility and integration with the existing urban area. Environmental constraints, including flooding, heritage and biodiversity considerations, have been comprehensively assessed and appropriately addressed through the design and approved bulk earthworks framework.

Accordingly, the site remains well suited to the proposed civil works and subdivision.

5.7 Public Interest

The proposal remains in the public interest. The proposal delivers essential infrastructure and high-quality public open space that will benefit future residents of the precinct and the broader Corrimal community.

The timely delivery of Central Park, Southern Park, the internal road network, and pedestrian infrastructure will provide early public benefits and support the coordinated delivery of future housing supply, including affordable housing. The proposal aligns with strategic planning objectives, supports urban renewal and ensures that development occurs in an orderly, efficient and well-serviced manner.

Having considered all relevant matters, the proposal will not create any additional environmental impacts. The refinements introduce additional measures to ensure that previously known and assessed impacts will be appropriately managed and mitigated where relevant. On this basis, the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

Disclaimer

This report is dated 14 May 2026 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of LEGPRO 70 PTY LTD ATF LEGPRO 70 UNIT TRUST (**Instructing Party**) for the purpose of Response to Submissions Report (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

Appendix A Detailed Responses to Council Submission

Appendix B Updated Mitigation Measures

Appendix C TfNSW Response Letter

Appendix D Revised BDAR Waiver Request (dated 7 May 2026)

Appendix E Revised Civil Works Plans

Appendix F Revised Plan of Subdivision

Appendix G Civil Design Verification Statement

Appendix H Landscape Design Package

– Central Park

Appendix I Landscape Design Package

– Stage 2-4 Streetscape

Appendix J Landscape Design Package

– Southern Park

Appendix K Historical Archaeology Response



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