

Appendix D

Detailed Response to Submissions

This section provides a detailed summary of the Applicant's response to the matters raised in submissions received.

1.1 Department of Planning, Housing and Infrastructure

The Applicant's response to the Department of Planning, Housing and Infrastructure submission is outlined in **Table 1** below.

Table 1 Department of Planning, Housing and Infrastructure Submission

Item	Matters Raised	Responses
Submission #1		
Built Form		
DPHI-1	<i>Amend the proposed building heights to ensure the proposal complies with the sun access plane to MacCabe Park, as detailed in Clause 8.3 of the LEP, and demonstrate no overshadowing of MacCabe Park occurs between 12-2pm midwinter.</i>	The Updated Architectural Drawings at Appendix E detail the amendments to the design of the scheme to ensure no overshadowing to the sun access plane between 12pm-2pm midwinter. This includes: • reducing the height of Building 1 where it previously impacted the park; • units within Building 2.2 have been removed to reduce massing which previously overshadowed the park; and • the hotel roof level has been amended to eliminate previous overshadowing of the park. This amendment was presented to DPHI on 17 March 2026, subsequently on 18 March 2026, DPHI provided the following feedback via email: <i>"The Department supports the changes, full compliance with the sun access plane is a necessary requirement. You may re-distribute the lost GFA to other parts of the development unaffected by the plane."</i> Refer to the Architectural Design Response at Appendix I for detailed visuals that illustrate how the proposed massing has been amended to address this comment.

Item	Matters Raised	Responses
DPHI-2	Confirm whether a portion of Building 2.3 breaches the 48m height plane. Justify any breach and update the Clause 4.6 variation request accordingly.	As shown in the Updated Architectural Drawings at Appendix E the apartment layout for Building 2.3 has been amended to incorporate a chamfered edge that now removes the previous encroachment on the height control line. This amendment was presented to DPHI on 17 March 2026, subsequently on 18 March 2026, DPHI provided the following feedback via email: <i>"The Department can accept a properly justified Clause 4.6 variation to deal with the slight breach created by Building 2.3. Please detail the full extent of the protrusion in the RtS plans."</i> As such, the Clause 4.6 Variation Statement at Appendix AA has been amended to include justification of the partial height breach of Building 2.3.
DPHI-3	Concern is raised about the proposed building separation distance between Buildings 2.1 and 2.2. In this regard, the Department requests further consideration of: - options to adjust the proposed towers to enhance building separation, including shifting or reorienting the buildings - the inclusion of additional privacy measures including window treatments (such as angled bay windows), reoriented openings, and considering alternative dwelling layouts to minimise overlooking.	The proposed design of Buildings 2.1 and 2.2 has been revised to increase the building separation distances. These amendments were presented to DPHI on 17 March 2026 and subsequently on 18 March 2026, DPHI provided the following feedback via email: <i>"The Department supports the changes made here, including the reduced setback to Crown Street and the new core location."</i> <i>The Department also recommends exploring further privacy treatment options between the balcony segment of Building 2.3 and the southern living areas of Building 3. While this can be conditioned in a consent, it would be cleaner if this is detailed in the RtS plans."</i> The Updated Architectural Drawings (Drawing DA3025) at Appendix E demonstrates that the separation between Building 2.1 and Building 2.2 has been enhanced by rotating Building 2.1 in an anticlockwise direction and reducing its setback to Crown Street from 9m to 6m (reduction of 3). The proposed location of the lift core on Building 2.1 has also been relocated to the southern facade to help reduce opportunities for direct overlooking, and improve privacy to habitable windows on Building 2.2. Further, the re-positioning of Building 2.1 further north to Crown Street has enabled an increased separation distance between Building 2.1 and Building 2.2. Specifically, the separation has been increased from 8.9m to 12m on western side and from 11.3m to 15m on eastern side. Further privacy measures have also been incorporated into the design, including privacy screens and obscured glazing to habitable room windows and balconies, to minimise overlooking and maintain residential amenity. Refer to the Architectural Design Response at Appendix I for a detailed illustration of the proposed privacy measures.

Item	Matters Raised	Responses
DPHI-4	<i>Detail the location of all mechanical plants and lift overruns servicing the development on the architectural plans, including for the supermarket, and all retail and commercial tenancies. Ensure that all plant areas are appropriately screened to prevent visual and acoustic impacts.</i>	The Updated Architectural Drawings at Appendix E includes the extent of mechanical plants on rooftops. This amendment was presented to DPHI on 17 March 2026, subsequently on 18 March 2026, DPHI provided the following feedback via email: <i>“No issue raised with location of rooftop plans, subject to appropriate screening for visual and acoustic impacts.”</i> The NVIA details the relevant project trigger noise levels, including those required to be achieved for all plant and equipment. The project trigger noise levels are required to be achieved by the operation of all building services equipment including future retail, commercial tenancies and the like. Given the preliminary stage of the project, detailed selections of mechanical equipment is yet to be undertaken and therefore details of specific acoustic mitigations are not possible. As part of the normal detailed design of the project an acoustic assessment of all proposed plant and equipment will be undertaken, which will include all required mitigations such that project triggered noise levels will be achieved. Based on experience with other similar projects, compliance with the project trigger noise levels will be possible and practical including mitigations such as acoustic screen, internally lined ductwork, acoustic silencers and the like. It is noted that the proposed development no longer includes a supermarket tenancy. Appropriately worded conditions of consent can ensure that the specified trigger noise levels are applied to the development and acoustic screening details can be submitted at the relevant detailed design stage of the project.
Street Activation		
DPHI-5	<i>Provide active uses along the ground level of the Marcus Clarke Building, to support its adaptive reuse and contribute positively to the Crown Street CBD streetscape.</i>	As shown in the Updated Architectural Drawings at Appendix E and the accompanying Architectural Design Response at Appendix I, the ground level of the Marcus Clark Building will be activated with active uses along its road frontage. This amendment was presented to DPHI on 17 March 2026, subsequently on 18 March 2026, DPHI provided the following feedback via email: <i>“Support the reinstatement of openings and active uses on the ground plane. The current plans detail that the parking will be above street level on the corner of Atchinson and Crown Street,</i>

Item	Matters Raised	Responses
		with active uses starting at RL 24.6. Any aboveground parking on this frontage is not supported and it is understood that this is an error in the public domain levels. The Department recommends clarifying the public domain RLs shown in the elevations to ensure accuracy." The interface of the Marcus Clark Building has been refined to enhance its presentation and relationship with the public domain. Along Crown Street, the upper-level access stair has been recessed to improve the building frontage. Existing windows along Atchison Street that were previously obscured have been reopened to reinstate the building's historic façade rhythm and provide increased passive surveillance. The Building 1 fire stair egress has been relocated to minimise its impact on Atchison Street, while the adjacent retail tenancy has been reconfigured to provide direct street access at the corner of Atchison and Burelli Streets, creating a more active and engaging street interface which positively contributes to the CBD. The combination of these changes ensures the achievement of a design outcome that responds positively to the streetscape. The Public Domain Plans at Appendix V have been updated to correctly state the public domain RLs.
DPHI-6	<i>Improve the Burelli Street frontage in line with SDRP recommendations for landscaping, activation and passive surveillance from the 3rd presentation.</i>	Refer to the response to SDRP-10 and SDRP-11. The Updated Architectural Drawings at Appendix E demonstrate that the Burelli Street frontage has been materially improved through the following design changes: • The entrance to the commercial tenancy at the corner of Burelli Street and Atchison Street has been relocated to the Burelli Street level, which reinforces pedestrian footfall and activation along this part of Burelli Street. • The setback to the commercial tenancy frontage at the south-west corner of the Burelli Street been reduced to 3m (previously 6m). This reduced frontage provides a more consistent alignment along Burelli Street and greatly improves how the building will address the street. • Appropriate landscaping is provided at ground floor within the 3m setback that will ensure street activation is maintained with clear sightliness and level entry access to the commercial building is provided from the street, adjacent to the laneway access.
DPHI-7	<i>Improve the interface of the commercial tenancy with the street at the south-west corner of the building by improving its alignment to the street and providing an</i>	As shown in the Updated Architectural Drawings at Appendix E, the commercial tenancy line at the south-west corner of the building has been reduced to 3 metres. In addition, the landscaping in front of the commercial tenancy has been redesigned as a more civic-style landscape treatment to improve clear sightlines and provide level, accessible entry

Item	Matters Raised	Responses
	<i>accessible, street-level entry. Ensure any landscaping in front of the tenancy maintains clear sightlines to the street.</i>	to the tenancy. The revised commercial tenancy design also provides a distinct separate interface with the Marcus Clark façade, and proposed greater retention of the façade fronting Burrelli Street. This amendment was presented to DPHI on 17 March 2026, subsequently on 18 March 2026, DPHI provided the following feedback via email: <i>“The Department’s key concern was that the tenancy appeared to be sunken from street level (due to the provided public domain RLs). The new renders show street level entry which is supported. Ensure accurate levels are provided in the RtS plans. Further design development is recommended to ensure a proper interface is maintained between the Marcus Clarke building and Building 01 on the Burrelli street setback, the changes must be supportable from a heritage perspective, with updated documentation provided.”</i>
DPHI-8	<i>Provide an awning strategy for the development, detailing awnings along all street frontages, including the Burrelli and Kiera Street frontages</i>	The Architectural Drawings (Drawing DA3026) at Appendix E have been updated to include an awning strategy. Awnings are proposed at each street frontage, notably a new awning is proposed in the centre of the Burrelli Street frontage, and reinstated awnings are proposed at the corner of Burrelli Street and Kiera Street and the corner of Atchison Street and Burrelli Street.
Public Domain		
DPHI-9	<i>Provide civil drawings and an updated public domain plan that clearly detail the works required by both Council and TfNSW including:</i> <i>the removal of the slip lane on Atchinson Street and signalisation of the intersection</i> <i>the redesign of Crown Street to the satisfaction of TfNSW, including the works to accommodate the bus stop relocation and widened kerb alignment on both sides of the street</i> <i>the works required on Keira Street including any changes to the kerb alignment</i> <i>the works on Burrelli street to accommodate the site access including signalisation of the intersection, removal of crossings and preventing right turns into the site</i> <i>swept path diagrams for any relevant vehicles including buses and include details of any regulatory signage and the location of all necessary street infrastructure.</i>	The Public Domain Plans at Appendix V have been updated in coordination with the traffic engineering and landscaping consultants. The Applicant also undertook detailed engagement with TfNSW and Wollongong Council as part of the RtS to ensure the amended design fully addresses their requirements. The design of the public domain has been updated in response to all the matters raised, including the removal of the left slip lane on Atchinson Street and signalisation of the intersection, the location of works to Crown Street to accommodate the bus stop relocation and widening kerb alignment, the works required on Keira Street, works on Burrelli Street, and the location of the regulatory signage and all necessary street infrastructure. Furthermore, further detail including a swept path analysis has been prepared and is available at the updated Traffic Impact Assessment at Appendix M. Further detail is provided in the response to TfNSW-1 to TfNSW-3, TfNSW-7, TfNSW-8, TfNSW-10, and TfNSW-15 to TfNSW-17.

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DPHI-10	<i>Ensure all landscape and architectural plans are updated to be consistent with revised public domain plans.</i>	The Updated Architectural Drawings at Appendix E and the Updated Landscape Plan, at Appendix H , are consistent with the Updated Public Domain Plan at Appendix V .
View Loss		
DPHI-11	<i>Provide additional perspectives from nearby apartment buildings, including 12 Regent Street, 15 Railway Parade, 10 Thomas Street and 3 Rawson Street to clearly illustrate the potential view loss impacts of the proposal on these properties. Views should be taken from a range of levels within these buildings, including the worst affected apartments.</i>	As detailed within the addendum Visual Impact Assessment (VIA) at Appendix DD , additional perspectives and photomontages have been provided from the requested nearby apartment buildings, including 12 Regent Street, 15 Railway Parade, 10 Thomas Street and 3 Rawson Street. Views were taken from a range of levels within the requested buildings as requested and a further assessment of the visual impact of the scheme on these views has been provided as part of the addendum VIA.
Pedestrian Permeability		
DPHI-12	<i>Consider options to enhance east-west permeability through the podium by providing a connection/additional entry from the supermarket to the western through-site link, as well as a connection from the Marcus Clarke building's large retail tenancy to both the western laneway and Atchison Street.</i>	In response to this recommendation by DPHI, the Applicant has revised the design of the scheme to include the provision of an east to west pedestrian through-site link. The proposed new through-site link will connect from the proposed eastern public plaza at lower ground floor to the western laneway at ground floor. The new through-site link will include frontage and access to retail tenancies at the eastern end of the site and residential lobbies to Building 2.3, ensuring the link will be activated and benefit from good levels of pedestrian and resident footfall. The proposed through-site link will be 4.5 m wide along its entirety, with a double-height clearance of 6m from the plaza level and 3m from the laneway level. To ensure safe access and movement through the site in accordance with CPTED principles, the through-site link will be gated and closed outside of normal business hours (8am – 6pm). Refer to the Lower Ground Floor (DA2003) and Ground Floor (DA2004) of the Updated Architectural Drawings at Appendix E and the Updated Design Report at Appendix F. It is noted that the proposed development no longer includes a supermarket tenancy.
Parking		
DPHI-13	<i>The Department supports reduced car parking within the Wollongong CBD, consistent with Council comments. Accordingly, consider reducing residential parking from 577 to 468 spaces (consistent with the Housing SEPP) as well as the commercial parking from 88 to 42 spaces and supermarket parking from 80 to 26 spaces (consistent with Council's controls). A corresponding reduction in above-ground car parking is also</i>	The design has been revised to reduce the proposed car parking provision from 774 spaces to 675 parking spaces (-99 spaces). This reduction reflects the removal of the supermarket from the proposed development alongside a reduction in residential car parking provision. The proposed revised car parking provision is as follows: - 525 x residential car parking spaces (reduced from 547 spaces);

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	<i>recommended to enable a higher-quality ground plane with improved street activation, circulation, and pedestrian amenity within the CBD.</i>	- 78 x residential visitor spaces (increased from 49 spaces); - 52 x commercial / retail spaces (reduced from 63 spaces); and - 10 x car share spaces. - 10 x hotel (no change). It is noted that under the Housing SEPP provisions, the minimum residential parking requirement for the scheme is 473 spaces, and the proposal will exceed this requirements by 52 spaces. The proposed additional car parking is considered appropriate in this instance as the Housing SEPP standards are not applied as maximum car parking requirement to the development. In addition, the additional car parking provision will ensure sufficient on-site parking provision for future residents and ensure there are no overflow on-street parking stress demands within the site context, which would impact local residents. The proposed visitor parking is considered sufficient to serve the development given the CBD context and proximity to public transport connections. The proposed retail, commercial and hotel car parking provision is considered appropriate and has been derived from applying the car parking credits under Clause 7.5 of Chapter E3 of the Wollongong DCP. The proposed car parking provision does not negatively impact the ground floor plane of the development. All frontages to the development are activated at ground floor with pedestrian connectivity and movement through the site maximised through the provision of pedestrian connections. Overall, the proposed car parking provision is considered sufficient to serve the demand of the future development and has been balanced alongside the key development objectives of providing a high quality, well-connected and well activated ground floor plane across the entirety of the site.
DPHI-14	<i>Provide publicly accessible car share spaces within the development, to encourage reduced car ownership and demonstrate the provision electric vehicle parking in line with the NCC.</i>	The Updated Traffic Impact Assessment at Appendix M identifies the inclusion of 10 car share spaces, and the necessary infrastructure and allowances to support EV charging facilities within the designated parking areas. GoGet, a car share company in Australia, have a Carshare Services Agreement with the Applicant, whereby GoGet intends to license the approved carshare spaces and deploy up

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		to ten (10) vehicles to the site to be available for use by residents and the broader community. For further detail see the GoGet Letter of Support at Appendix II. An Electrical Statement regarding the provision of EV at the site confirms that the proposal includes the necessary infrastructure and allowances to support EV charging facilities within the designated parking areas. For further detail see the Electrical Statement – EV provision at Appendix HH.
Loading and Access		
DPHI-15	<i>Prohibit right turns from Burelli Street to address TfNSW concerns and consult with TfNSW/Council to provide an acceptable service vehicle access that does not compromise the eastern through-site link</i>	Refer to the response to DPHI-9. Right turns into the basement car park will be prohibited and enforced by 'No Right Turn' signage. Right turns from Burelli Street into the service access will be prohibited by a median strip extending from the eastern edge of the driveway to the traffic signals. The Updated TIA at Appendix M provides amended swept paths demonstrating that medium rigid vehicles (MRV) and heavy rigid vehicles (HRV) can safely enter, turn and exit the site in forward gear and that the proposed service and loading bay arrangements is appropriate to service the development.
DPHI-16	<i>Update all swept path diagrams to demonstrate:</i> <i>the largest service vehicles can simultaneously enter and exit the site with no queuing on Burelli Street</i> <i>that the path for the supermarket truck does not infringe on the HRV loading zones</i> <i>that the swept paths for the HRVs start at their exact parking location as shown on the architectural plans</i>	Updated swept path diagrams are not required, as the requested information has already been addressed as follows: - To accommodate simultaneous passing for the largest service vehicles, the driveway needs to be widened to at least 20m as per AS2890.2. It is unlikely that such a width could be accommodated within the site constraints. Furthermore, a driveway of this width is not desirable from a pedestrian safety perspective, particularly given the high pedestrian activity in the area. - The proposed development no longer includes a supermarket tenancy, as such supermarket servicing vehicles are no longer required to service the development. - The swept path analysis within Attachment 5 of the Updated TIA at Appendix M illustrate the swept paths for the HRV from their exact parking location as shown in the Architectural Drawings.
DPHI-17	<i>Assess and confirm if adequate space is provided for supermarket unloading, pallet manoeuvring, and goods-lift access.</i>	Not applicable as the proposed development no longer includes a supermarket tenancy.

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DPHI-18	<i>Assess the loading and servicing provisions of the development against Council's requirements.</i>	The DCP does not specify a numerical requirement for loading bays but nominates the largest vehicle type to be accommodated for each land use (Office/Business – AV; Residential and Hotel – HRV). The proposal provides five (5) bays in total (2 MRV bays, 2 HRV bays, and 1 utility van bay), which satisfies the DCP provisions.
DPHI-19	<i>Detail delivery arrangements, including paths of travel from the loading dock to all retail, commercial, and hotel premises (without using residential lifts) and update the traffic assessment to reflect all delivery types, including hotel laundry and catering.</i>	Refer to the response to DPHI-53. A preliminary Freight and Delivery Management Plan has been developed within the TIA at Appendix M and details the vehicle access strategy, delivery types and frequency, delivery schedules, and operational guidelines to ensure the effective servicing of the site.
Bicycle Parking and facilities		
DPHI-20	<i>Assess the movement of cyclists through the parking area including any mitigation measures for conflicts between vehicles and pedestrians, it is recommended that bicycle parking be consolidated around the end-of-trip facilities to improve amenity for cyclists.</i>	The Architectural Drawings at Appendix E have been updated to reflect the relocation and consolidation of the commercial and retail bicycle parking around the end-of-trip facilities (refer to Drawing Number DA2002).
DPHI-21	<i>Detail the proposed number of change rooms, showers and personal lockers on the architectural plans.</i>	The proposed provision of End of Trip facilities is in accordance with the rates stipulated within the Wollongong DCP 2009, specifically: • 18 x Female and male shower and change rooms • 79 x Personal lockers This is detailed in the Updated TIA at Appendix M and illustrated in the Updated Architectural Drawings (Drawing DA2002) at Appendix E.
Waste		
DPHI-22	<i>Address Council's comments regarding waste management and demonstrate that the proposal provides:</i> • <i>dedicated and suitably sized on site waste storage areas for all uses (including the commercial, retail, and supermarket components) and confirm that the capacity of the overall bin holding area can accommodate waste volumes at peak usage</i> • <i>correct floor area calculations for waste management aligned with the architectural plans for commercial and retail spaces.</i>	Refer to the responses to Council-46 to Council-53. • Refer to the response to DPHI-38 and DPHI-45. • Refer to the response to DPHI-46. • Refer to the responses to DPHI-40 to DPHI-44. • Refer to the response to DPHI-47.

Item	Matters Raised	Responses
	• appropriate internal waste and recycling arrangements for all buildings, including direct access from bin rooms to car parks or loading areas, and safe bin transport routes where paths of travel may be obstructed. • improved FOGO service provision with improved accessibility for residents and FOGO provision for other land uses (commercial, retail and hotel).	
Acoustics		
DPHI-23	Update the acoustic report to include the latest TfNSW traffic volume maps which demonstrate that the site triggers the acoustic considerations of the Transport and Infrastructure SEPP.	Figure 3 at the Noise and Vibration Impact Assessment (NVIA) at Appendix J , includes the updated TfNSW traffic volume maps. As the proposal is already compliant with Clause 2.120 of the Transport and Infrastructure SEPP, as outlined in Section 4.1.2 of the Updated NVIA, the updated traffic mapping does not give rise to any additional technical noise or vibration impacts requiring further assessment.
DPHI-24	Detail provisions to ensure acoustic comfort is maintained for dwellings that are adjacent to carparking, loading and access areas and to lift cores. Detail any acoustic treatments that would be required.	As outlined within the Acoustic Response to Submissions Letter at Appendix Y, the architectural layouts of the project include a number of apartments which are adjacent to carparking, loading and access areas. In these locations the walls separating dwellings and common areas will be required to comply with the minimum requirements of the BCA, including construction which includes not less than Rw 50 for walls and Rw + Ctr 50 for floors (as detailed in Part F7 of Amendment 2 of the 2022 BCA). Based on all building elements complying with the BCA, the resulting acoustic impact from the use of the carparking, loading and access areas will be acceptable and protect the amenity of the future dwellings. Experience with similar projects including residential dwellings with walls which separate loading areas, carparks and the like (and included construction similar to those which will be included in the Crown Street, Wollongong project), indicates that the resulting acoustic impact on future occupants will be acoustically acceptable. For dwellings which are located adjacent lift shafts within the building will include construction which include a performance of not less than Rw + Ctr 50 and includes discontinuous construction (which include a 20mm gap between 2 leaves of a wall) and required by part F7 of the of Amendment 2 of the 2022 BCA. Based on the building including BCA complaint constructions the resulting acoustic amenity within the dwellings will be protected.

Item	Matters Raised	Responses
		The design and construction of other similar residential buildings have been successfully delivered without unacceptable acoustic impacts on occupants.
Accessibility		
DPHI-25	<i>Demonstrate an accessible path of travel can be provided:</i> <i>to the commercial tenancy located on the south-western corner of the Burelli Street frontage.</i> <i>from the basement carpark to the retail and commercial tenancies located on the western side of the development, noting access through the residential lobbies is not supported.</i> <i>from Crown Street into the eastern through-site link.</i>	The Architectural Drawings at Appendix E have been updated to demonstrate that an accessible path of travel can provided as follows: - An accessible path of travel is available from the commercial tenancy located on the south-western corner of the Burelli Street frontage from Burelli Street on the ground floor, see Drawing Number DA2002. The path is step-free and designed to accommodate wheelchair users, mobility scooter users, prams, elderly visitors and people with limited mobility. - An accessible path of travel is available from the basement carpark to the retail and commercial tenancies located on the western side of the development via a passenger lift, see Drawing Number DA2002 and DA2003. - An accessible plan of travel is available from Crown Street into the eastern through-site link via a passenger lift located adjacent to the stairs, see Drawing Number DA2004.
Miscellaneous		
DPHI-26	<i>Clarify if the hotel will be provided with an on-site laundry service of sufficient capacity to service the development. If no laundry is provided, detail how the hotel will be serviced, update the plans and traffic and loading assessments accordingly.</i>	The Architectural Drawings at Appendix E have been updated to clarify that the hotel will be provided with an on-site laundry service at eastern boundary of Basement 01, for further details see Drawing Number DA2001.
DPHI-27	<i>Detail how the various uses within the site will be coordinated including the maintenance and management of all publicly accessible spaces including the through-site links and communal open space.</i>	Refer to the Plan of Management lodged with the SSDA submission at Appendix RR. A final plan of management can be secured via condition of consent.
DPHI-28	<i>Clarify that adequate services can be provided to the commercial and retail tenancies based on their anticipated future use, this should include any mechanical ventilation needed to service a food and drink premises.</i>	An Infrastructure Delivery, Management and Staging Plan at Appendix X has been prepared to provide preliminary clarification that adequate services can be provided to the proposed commercial and retail tenancies. Services connections details will be provided at a future stage.
DPHI-29	<i>Provide details of ADG compliant soil volumes and depths within major planter boxes.</i>	The Updated Landscape Plan (Drawing LD-DA900) at Appendix H provides details of the soil volumes and depths within the major planter boxes for planting at podium level and planters at grade. These plans demonstrate proposed soil volumes and depths comply with ADG requirements.

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DPHI-30	<i>Detail how the number 59,122m² in Appendix OO referencing total GFA allowed under the LEP has been derived.</i>	Refer to Appendix MM which contains a detailed floorspace calculation for the proposed scheme and details how the total allowable GFA has been derived.
DPHI-31	<i>Update the EDC report to reference the EIS and be directly addressed to the Department. Additionally, cost demolition and remediation works, update the final costings accordingly.</i>	The Updated Estimated Development Cost Report at Appendix G is addressed to the Department, identifies current costings and references the EIS.
DPHI-32	<i>Prepare a preliminary public art plan in line with Council's public art strategy (Animating Wollongong).</i>	A Preliminary Public Art Plan at Appendix EE has been prepared by in accordance with Council's <i>Public Art Strategy 2022-2032</i> .
Plan details		
DPHI-33	<i>Update the plans to provide RL 's for the public domain, including street elevations, detail heights on pavements, and at each entry point into the site including both pedestrian and vehicular entries.</i>	The Updated Architectural Drawings (Drawings 3000, 3001, 3002 and 3003) at Appendix E provides the RLs for the public domain.
DPHI-34	<i>Provide detailed elevations and renders of each entryway into the site, including the pedestrian entry at Atchinson Street, the stairway to Kiera Street, the two through -site links entryways on both Crown Street and Burelli Street, and the vehicular access points on Burelli Street, ensure that elevations include public domain levels.</i>	The Updated Architectural Drawings (Drawings 3000, 3001, 3002 and 3003) at Appendix E provides detailed elevations of each entryway into the site.
DPHI-35	<i>Provide detailed elevations and renders of the eastern and western facings of each through - site link detailing the pedestrian experience through the site.</i>	The Updated Architectural Drawings (Drawings 3000, 3001, 3002 and 3003) at Appendix E provides detailed elevations of the eastern and western facings of each through-site link.
DPHI-36	<i>Update the architectural plans to detail doors or an appropriate entryway for each retail tenancy.</i>	The Updated Architectural Drawings (Drawings 2001, 2002, 2003, 2004, and 2005) at Appendix E , provides details of the entryway to each retail tenancy.
DPHI-37	<i>Provide detailed elevations and renders of entries into each residential lobby on the site.</i>	The Updated Design Report at Appendix F provides renders of the entrance to each residential lobby on the site.
Submission #2		
Waste		
DPHI-38	<i>Show a dedicated waste room for the commercial building on the plans.</i>	Refer to Appendix A.1 of the Updated OWMP at Appendix W for labelled bin rooms and their specific locations. The dedicated commercial bin room is located on the mezzanine level.
DPHI-39	<i>Further assess waste collection requirements for the supermarket and detail a waste storage area of sufficient size on the plans.</i>	Not applicable as the proposed development no longer includes a supermarket tenancy,

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DPHI-40	<i>Clarify how recycling waste is moved from units to the waste room in Building 01, if using chutes detail sufficient room at the base of the chute, within the bin room to accommodate all required bins.</i>	As detailed within the Updated OWMP at Appendix W a single general waste chute will be installed in each building core with access provided to all residents on each residential level (except Building 1, which will propose a dual chute system for general waste and recycling). For the remaining buildings, separate 240L recycling bins will be provided in a compartment adjacent to the general waste chute for the storage of recycling. Residents will be responsible for walking their general waste and recycling to their allocated disposal point and placing their general waste into the general waste chute and recycling into the 240L recycling bin. The 240L recycling bins on each level will be monitored by the building caretaker, and full bins will be decanted into larger 1100L bins via the aid of a bin lifter.
DPHI-41	<i>Provide direct access from the Building 01 bin room to the car park to avoid moving bins through the residential lobby.</i>	The updated OWMP at Appendix W and Updated Architectural Drawings at Appendix E indicate that direct access is provided from the Building 01 bin chute discharge room to the car park.
DPHI-42	<i>Detail how bins from the bin room servicing Building 03 can be moved to the bin holding area, if the accessible car space in the path of travel is occupied.</i>	As detailed in the Architectural Drawings at Appendix E Drawing Number DA2001, Basement Level 01 and the location of bin room for Building 03 has been redesigned to provide a path of travel from the bin room to the bin holding area. The accessible car spaces no longer obstruct the path of travel from the bin room to the bin holding area.
DPHI-43	<i>Provide a direct internal connection from the residential lobby to the bin loading area for Building 2.3.</i>	As detailed in the Architectural Drawings at Appendix E Drawing Number DA2001, the entrance to the bin room is adjacent to the entrance for the residential lobby, and a direct internal connection has not been provided.
DPHI-44	<i>Confirm that the north western loading dock ramp has adequate width and gradient to safely accommodate bin movements into the bin room.</i>	The updated OWMP at Appendix W and Updated Architectural Drawings at Appendix E confirm that the ramps within the proposed development have adequate width to accommodate bin movement and gradient to comply with the relevant Australian Standards.
DPHI-45	<i>Further detail how waste will be transported and stored from the commercial and retail tenancies to the bin holding area and if the area has sufficient capacity to hold all waste (including residential) from the development at peak usage.</i>	As detailed in the Updated OWMP at Appendix W waste from the commercial and retail tenancies will not be held within the residential bin holding room. Residential waste will be collected weekly by a Council collector from the residential bin holding area, whereas waste from commercial and retail tenancies will be kept at their dedicated bin rooms and collected by a private contractor at the below frequency: <u>Retail tenancies:</u>

Item	Matters Raised	Responses
		- General Waste: 9 x 1100L bins collected 7 x weekly. - Recycling: 8 x 1100L bins collected 7 x weekly. - FO: 12 x 240L bins collected 7 x weekly. <u>Commercial tenancies:</u> - General Waste: 2 x 1100L bins collected 3 x weekly. - Recycling: 3 x 1100L bins collected 3 x weekly. - FO: 2 x 240L bins collected 5 x weekly.
DPHI-46	<i>Cross check and correct discrepancies between waste management floor area calculations and the architectural plans for commercial and retail spaces.</i>	The OWMP at Appendix W has been revised to ensure Tables 4 and 5 are consistent with the proposal GFA schedule.
DPHI-47	<i>Provide FOGO services for all other land uses, including commercial, retail, and hotel components, attempt to provide fogo for residential in line with Council comments</i>	Refer to the response to Council-50 and Council-51 .
Access		
DPHI-48	<i>Right turns from Burelli Street into the development are not supported by TfNSW, detail measures to ensure compliance and amend swept path diagrams accordingly.</i>	Refer to the response to DPHI-9 and DPHI-15 . Right turns into the basement car park will be prohibited and enforced by 'No Right Turn' signage. Right turns from Burelli Street into the service access will be prohibited by a median strip extending from the eastern edge of the driveway to the traffic signals. For further detail see the Updated TIA at Appendix M .
DPHI-49	<i>Clarify that a 17.5m trailer is of an appropriate size to service the proposed supermarket.</i>	A supermarket is no longer proposed as part of the development and 17.5m trailer is no longer required as part of the service vehicle requirements.
DPHI-50	<i>Clarify if the raised area (RL 14.67) adjacent to the lift in the loading zone serves as the primary drop off point for the supermarket truck. If so, provide evidence that there is sufficient area to store the goods from a fully loaded trailer and there is sufficient circulation area to manoeuvre pallets into the goods lift.</i>	Not applicable as the proposed development no longer includes a supermarket tenancy,
DPHI-51	<i>Detail how deliveries to each individual retail or commercial premises will be carried out from the loading dock, including to all the premises on the western side of the development, the use of residential lifts for goods deliveries is not supported.</i>	A Freight and Delivery Management Plan has been developed within the TIA at Appendix M and details the vehicle access strategy, delivery schedules, and operational guidelines to ensure the effective servicing of the site. A delivery and goods lift is located within the loading dock area, and residential lifts will not be used for goods deliveries.

Item	Matters Raised	Responses
DPHI-52	<i>Justify why retail premises have been classified for parcel and courier delivery rather than goods delivery in the traffic impact assessment.</i>	Table 6-1 of the Freight and Delivery Management Plan within the TIA at Appendix M outlines that retail premises have been classified for goods delivery and parcel and courier delivery.
DPHI-53	<i>Assess the types of deliveries required by the hotel, including laundry (if no laundry is to be provided) and catering services, update the traffic impact assessment accordingly.</i>	As a laundry/linen room is provided for the hotel tenancy and laundry delivery will not be required. The Updated TIA at Appendix M includes an assessment of the delivery types to serve the hotel and identifies a van or small rigid vehicles as sufficient, with 2-3 trips per day.

Acoustics

DPHI-54

Clarify the recommended amenity noise levels in the report which detail a suburban noise amenity area but provide amenity noise levels for an urban area (Table 5). The Department considers that the urban noise amenity area designation is most appropriate for the site (I believe this will improve the figures in your assessment to the development's benefit)

The amenity noise levels included in Table 5 of the Noise and Vibration Impact Assessment (NVIA) (Appendix II of the EIS), see excerpt below, include those which are consistent with the amenity noise levels of the EPA NPfl (see section of NPfl below).

Table 5 NSW NPI – Recommended LAeq Noise Levels from Noise Sources

Type of Receiver	Indicative Noise Amenity Area	Time of Day ¹	Recommended Amenity Noise Level (LAeq, period) ² (dBA)
Residence	Suburban	Day	55
		Evening	45
		Night	40
Commercial		When in use	65

Note 1 For Monday to Saturday, Daytime 7:00 am – 6:00 pm; Evening 6:00 pm – 10:00 pm; Night-time 10:00 pm – 7:00 am. On Sundays and Public Holidays, Daytime 8:00 am – 6:00 pm; Evening 6:00 pm – 10:00 pm; Night-time 10:00 pm – 8:00 am.

Note 2 The LAeq is the energy average sound level. It is defined as the steady sound level that contains the same amount of acoustical energy as a given time-varying sound.

Item	Matters Raised	Responses																														
Table 2.2: Amenity noise levels. <table><tr><th>Receiver</th><th>Noise amenity area</th><th>Time of day</th><th>L_{Aeq}, dB(A)</th></tr><tr><td colspan="3">(see Table 2.3 to determine which residential receiver category applies)</td><td>Recommended amenity noise level</td></tr><tr><td rowspan="9">Residential</td><td rowspan="3">Rural</td><td>Day</td><td>50</td></tr><tr><td>Evening</td><td>45</td></tr><tr><td>Night</td><td>40</td></tr><tr><td rowspan="3">Suburban</td><td>Day</td><td>55</td></tr><tr><td>Evening</td><td>45</td></tr><tr><td>Night</td><td>40</td></tr><tr><td rowspan="3">Urban</td><td>Day</td><td>60</td></tr><tr><td>Evening</td><td>50</td></tr><tr><td>Night</td><td>45</td></tr></table>			Receiver	Noise amenity area	Time of day	L _{Aeq} , dB(A)	(see Table 2.3 to determine which residential receiver category applies)			Recommended amenity noise level	Residential	Rural	Day	50	Evening	45	Night	40	Suburban	Day	55	Evening	45	Night	40	Urban	Day	60	Evening	50	Night	45
Receiver	Noise amenity area	Time of day	L _{Aeq} , dB(A)																													
(see Table 2.3 to determine which residential receiver category applies)			Recommended amenity noise level																													
Residential	Rural	Day	50																													
		Evening	45																													
		Night	40																													
	Suburban	Day	55																													
		Evening	45																													
		Night	40																													
	Urban	Day	60																													
		Evening	50																													
		Night	45																													
Miscellaneous																																
DPHI-55	Detail trolley parking bays in the plans, in proximity to the carparking spaces dedicated to the supermarket.	Not applicable as the proposed development no longer includes a supermarket tenancy,																														
DPHI-56	Provide evidence that the relocation of any Australia post infrastructure has been approved by Australia Post.	As outlined within the Civil Engineering Response to Submissions Letter at Appendix LL , Australia post infrastructure is unchanged and retained at its current location, the proposed works in that section of Crown Street will not impact on the location and servicing of the post boxes.																														
DPHI-57	Clarify why the stratum subdivision for the hotel does not include the back of house and services areas which has been included as part of Lot 1.	The Preliminary Stratum Plan at Appendix CC has been provided to respond to this item and clarify the intended stratum subdivision for the hotel. This is provided as indicative information and will not be finalised until the registration of the strata plan with LRS.																														
DPHI-58	Any entries into the site must be assessed for level changes from the public domain with measures in place to provide universal access.	As outlined within the Accessibility Report at Appendix Z, entry accessibility has been assessed for level changes from the public domain. Universal access is defined as access for all occupants, which is provided via stairs for able-bodies occupants and lifts and compliant grade for wheelchair occupants. To ensure accessibility compliance, the Accessibility Report recommends performance solutions to be provided at CC stage or redesign at CC stage as relevant.																														

1.2 State Design Review Panel

The Applicant's response to the State Design Review Panel's submission is outlined in **Table 3** below.

Table 2 State Design Review Panel Submission

Item	Matters Raised	Responses
Site strategy, public domain and landscape		
SDRP-1	<i>It is understood that Council and TfNSW have agreed on the levels for the public domain. Ensure these levels inform the design of new public spaces and the built form from the outset, rather than deferring this key coordination process to post approval stages.</i> <i>a. Provide evidence of early consultation and coordination with Council and relevant parties.</i>	Refer to response to DPHI-58. Consultation was held on 9 April 2026 between the proponent team and representatives from Council and TfNSW to present the Applicant's design response addressing the public domain.
SDRP-2	<i>Delivering tree-lined, green streetscapes is essential to mitigate the impacts of climate change, promote walkability and realise other key co-benefits (e.g., air quality, population health). Demonstrate through plans, elevations and details that all streetscapes and public spaces provide the necessary conditions for trees and landscape to thrive in a cost-effective way. This includes:</i> <i>a. Sufficient and connected deep soil areas</i> <i>b. Adequately sized and unencumbered root zones</i> <i>c. Coordination with existing and proposed underground services and proposed site levels.</i>	The Landscape Plans (Drawing LD-DA002) at Appendix H detail the provision of a deep soil zone along the Burelli Street frontage enabling the delivery of a tree lined 'green' street with significant tree retention. Deep soil has been provided to the Public Plaza at the corner of Keira Street and Crown Street to facilitate tree canopy in the North facing corner of the site. Together, these deep soil zones equate to a reduced provision across the site to a total of 743m² (5.7%). This outcome is a direct result of the reduced setback along Burelli Street and the expansion of the bus zone on Crown Street in accordance with TfNSW requirements. A 500mm set down in landscaped areas in addition to 500mm seating a raised edges further facilitate tree growth to areas above suspended slab.
SDRP-3	<i>Ensure the planting selection accounts for private and public areas that may be shadowed by the towers.</i>	The Landscape Plans (Drawing LD-DA001) at Appendix H provide full sun and part shade in the plant schedule.
SDRP-4	<i>The proposal for retractable awnings in the west link is noted. Illustrate the awning strategy for public frontages across the site. Demonstrate through drawings how the design solution responds to site level changes and the various facades.</i>	Refer to the response to DPHI-8.
North-South links		

Item	Matters Raised	Responses
SDRP-5	<i>To reiterate SDRP 2 advice:</i> a. <i>Significantly reduce the gradient of the stairs in the east and west links to:</i> <i>support walkability and ensuring comfortable movement for all users, including the elderly and less able</i> <i>aid wayfinding and promote a perception of safety, allowing visual continuity along the entire through-site links.</i> b. <i>Design stairs and landings to contribute to a sense of place, establish a civic character and support activation.</i>	As detailed in the Updated Architectural Drawings at Appendix E, the proposed development incorporates lifts to facilitate inclusive access, with appropriately designed and compliant landing areas provided. The stair design has been amended to become more pedestrian friendly with smaller risers. This comment aligns with the package sent to the SDRP.
SDRP-6	<i>Refine the design of the west lane to improve the experience of the journey, the legibility of access areas and the circulation between the different uses and service areas.</i> a. <i>Consider widening the stairs.</i> b. <i>Ensure access to lobbies is legible and direct.</i>	a. The stairs have been widened at Burrelli Street to connect to the east-west link. b. Refer to the response to SDRP-18 and SDRP-22.
SDRP-7	<i>Ensure lifts at both links provide public, universal access for all level transitions. They should be clearly visible as part of the pedestrian route, present as public in character and facilitate an equitable and dignified experience for all users.</i>	As detailed in the Updated Architectural Drawings Appendix E lifts have been provided for both the laneway and the proposed public plaza to ensure level access is available for all pedestrian users.
SDRP-8	<i>Ensure the lawn in the East Plaza contributes to activation without obstructing pedestrian movements or compromising sightlines</i>	As detailed in the Updated Landscape Plans at Appendix H the central lawn to east plaza provides a seating edge to the major retail face. The eastern edge of the lawn also provides an informal edge to the finer grain retail edges.
SDRP-9	<i>Provide plans and section drawings of the revised north-south links design.</i>	The Updated Architectural Drawings (Drawings DA2003 and DA3015) at Appendix E, provide plans and section drawings of the revised north-south links.
Burrelli Street		
SDRP-10	<i>Burrelli Street provides a key pedestrian link from the train station to Crown Street Mall. The ambition is to transform this street into a green, safe and comfortable pedestrian route. As presented, the design does not yet deliver on this ambition.</i>	The proposed design for Burrelli Street has been updated in response to the SDRP feedback, and now provides a more comfortable, activated and safe pedestrian experience. Key amendments include: The entrance to the commercial tenancy at the corner of Burrelli Street and Atchison Street has been relocated to the Burrelli Street level, which reinforces pedestrian footfall and activation along this part of Burrelli Street.

Item	Matters Raised	Responses
		- The setback to the commercial tenancy frontage at the south-west corner of the Burelli Street been reduced to 3 metres (previously 6m). This reduced frontage provides a consistent alignment with Burelli Street and greatly improves how the building will address the street. - Appropriate landscaping is provided at ground floor within the 3m setback that will ensure street activation is maintained with clear sightliness and level entry access to the commercial building is provided from the street, adjacent to the laneway access.
SDRP-11	<i>Review the streetscape design to:</i> <i>a. create a consistent tree lined edge</i> <i>b. locate and size any driveways to prioritise pedestrian continuity and safety. Avoid a large, consolidated driveway.</i> <i>c. integrate requirements for any present or planned signalised crossings</i> <i>d. enable good interfaces with built form at the ground level, including to support activation and passive surveillance.</i>	The streetscape design has been reviewed and revised to provide an improved pedestrian outcome, specifically: - The provision of trees has been improved along Burelli Street, and has been , balanced with the requirement to maintain street activation through consistently aligned street frontage, vehicular access and egress to the site, and existing services infrastructure within the pedestrian footpath. Refer to Updated Landscape Plans (Drawing LD-DA100) at Appendix H. - The updated design proposes separate entry and exit points for vehicles and servicing, avoiding a large, consolidated driveway. This ensures continuity of pedestrian movement and safety along Burelli Street. Refer to Updated Architectural Drawings (Drawing DA2002) at Appendix E. - The ability to accommodate requirements for signalised crossings has been integrated into the design. Refer to Updated Public Domain Plans at Appendix V. - Enable good built form interfaces at the ground level. Refer to Updated Architectural Drawings (Drawings DA2003 and DA2004) at Appendix E.
SDRP-12	<i>Review the built form address of all podiums and towers onto this street.</i> <i>Develop:</i> <i>a. a varied but cohesive built form frontage</i>	As detailed in the Architectural Drawings at Appendix E the design and presentation of podiums and towers onto the street supports the provision of a varied but cohesive design approach that delivers a stronger interface between the site and the public domain than the proposal as exhibited.
SDRP-13	<i>Provide plans, elevations and cross-sections to illustrate items 10 and 11.</i>	, Plans, elevations and cross sections have been updated to illustrate the revised streetscape design that respond to the above items. (see Architectural Drawings at Appendix E)
Built form		

Item	Matters Raised	Responses
SDRP-14	<i>DPHI raised concerns about the building separation between Building 2.1 and Building 2.2. The alternative strategies presented to improve building separation, by redistributing GFA and height, demonstrated limited flexibility without generating other adverse impacts.</i>	Refer to the response to DPHI-3 .
	<i>Ensure there are no overshadowing impacts to MacCabe Park. There appears to be a minor overshadowing incursion, which should be easily resolvable.</i>	Refer to the response to DPHI-1 .
SDRP-15	<i>Ensure the generosity, aspect and amenity of the private communal area at the podium level is maintained.</i>	Noted. As requested, no changes are proposed to the private communal area at the podium level.
SDRP-16	<i>Continue refining options to improve privacy and aspect between Building 2.1 and Building 2.2. Consider:</i> <i>a. alternative or complementary windows treatments to screening film, such as high-level windows or external louvers.</i> <i>b. re-orientating windows, such as, an angled bay-window that relates to the adjacent building via one solid face towards the building and one glazed face angled away from it.</i> <i>c. alternative dwelling configurations. For example, replacing select 2-bedroom apartments with 1-bedroom apartments with integrated home office.</i>	Refer to the response to DPHI-3 .
SDRP-17	<i>Continue developing the proposed articulation of Building 1 to break down the massing, as shown in page 37 of the presentation pack.</i>	As detailed in the Updated Architectural Drawings (Drawing DA3005) at Appendix E , the proposed articulation of Building 1 has been amended as per the SDRP-3 presentation pack.
SDRP-18	<i>Ensure all towers provide a legible and easily accessible building address for pedestrians.</i>	All towers provide a legible and easily accessible building address for pedestrian. Specifically, Building 3 has a lobby entry from Crown Street, otherwise the buildings main entry lobbies are accessible via through the site links which have clear legible entry points. The Updated Design Report at Appendix F provides renders of the entrance to each residential lobby on the site. Refer to the response to DPHI-37 .

Item	Matters Raised	Responses
SDRP-19	<i>Simplify the carpark layout.</i>	The Updated Architectural Drawings at Appendix E includes a revised basement carpark layout that improves vehicle circulation and paths of travel throughout the basement levels.
Sustainability		
SDRP-20	<i>Sustainability initiatives for the public domain are discussed throughout this letter. The ESD approach for the built form was not discussed in detail. It was noted the design has the capability to be fully electrified; however, adoption of this approach was not confirmed.</i> <i>Adoption of a fully electrified development from day 1 is strongly encouraged.</i>	The proposed development is not a fully-electric building as the hot water and stoves are proposed to be gas. Sustainability initiatives for the proposed development include the provision of EV charging stations and have been detailed within the Ecologically Sustainable Development Report at Appendix Q of the submitted EIS.
Advice out of session		
SDRP-21	<i>The servicing of retail and commercial uses in the western portion of the site is unclear. Clarify how these uses will be serviced. Consider:</i> <i>a. providing a dedicated loading dock and goods lifts</i> <i>b. how the eastern loading dock can be optimized to service the west portion of the development</i> <i>c. how these basement servicing elements work for the staging.</i>	a. The proposed development includes one central loading dock that is accessible from both the eastern and western portion of the development. b. A Waste Letter – Staging at Appendix KK has been prepared to detail how the basements servicing elements will operate, confirming that the bin storage areas provided under Stage 1 alone will be sufficient for the full development. During Stage 1, the bin storage areas will operate below full capacity, and once Stage 2 becomes operational, the existing bin storage areas will accommodate the increased demand without requiring any changes.
SDRP-22	<i>Demonstrate lobbies, lifts and other circulation areas for the residential and commercial uses and service areas are legible, separated and generate direct and logic paths of travel.</i>	Refer to the response to DPHI-37 and SDRP-18 . The Updated Design Report at Appendix F provides the following information to demonstrate that the lobbies, lifts and other circulation areas are legible, separated and generate direct and logical paths of travel: - renders of the entrance to each residential lobby on the site, - pedestrian permeability diagrams, and - paths of travel for pedestrians and vehicles.
SDRP-23	<i>Demonstrate that the carparking provision:</i> <i>a. is commensurate with the site location in a central area within the catchment of the train station</i>	Refer to the response to DPHI-13 . The proposed car parking provision is commensurate with the site's highly accessible location within walking distance of the train station and has been reduced by 99 spaces compared to the previous scheme. The development therefore does not provide an

Item	Matters Raised	Responses
	<i>b. will not jeopardize the strategic objectives of promoting walkability and reducing carbon emissions.</i>	excessive supply of parking and appropriately balances resident needs with broader transport and sustainability objectives. The proposal supports the strategic objectives of promoting walkability, reducing private vehicle dependency, and lowering transport-related carbon emissions through the following measures: • A reduced visitor parking provision compared to the rate prescribed by the DCP. • Provision of 10 dedicated car share spaces, reducing the need for private vehicle ownership and supporting more efficient use of parking infrastructure. • Implementation of a Green Travel Plan, incorporating measures to encourage walking, cycling and public transport use by residents, occupants and visitors. Refer to the Updated TIA at Appendix M.

1.3 Wollongong City Council

The Applicant's response to the Wollongong City Council submission is outlined in **Table 3** below.

Table 3 Wollongong City Council Submission

Item	Matters Raised	Responses
Submission #1		
Public Domain		
Council-1	<i>The large direct flight of stairs from Burelli Street into the plaza is not considered an attractive entry point to the plaza.</i>	Refer to the response to SDRP-5 . The stair design has been amended to become more pedestrian friendly and a better quality entry into the plaza. This comment aligns with the package sent to the SDRP.
Council-2	<i>The Burelli Street frontage is fragmented and dominated by access, servicing and driveways and the purpose of the large setbacks is unclear. There is also limited activation, noting the Grand appears to have no openings directly to the street.</i>	The Burelli Street frontage has been amended to provide a more pedestrian friendly interface characterised by a more activated frontage and an improved public domain. The result is a more unified streetscape that is more legible, safe and welcoming. For further details refer to the response to SDRP-10 and SDRP-11 .
Car parking, access and servicing		
Council-3	<i>Consultation with TfNSW regarding the design detail of the bus stops on Crown and Burelli Streets and the impact of the service vehicle entry on the signalised intersection of Burelli and Kenny Streets will be required.</i>	Consultation was held on 9 April 2026 between the proponent team and representatives from Council and TfNSW to present the Applicant's design response addressing the design of the bus stops on Crown and Burelli Streets and the impact of the service vehicle entry on the signalised intersection of Burelli and Kenny Streets. The Applicant's preliminary RTS response was issued following consultation for TfNSW and Council's comment, with the only outstanding matter relating to adequate clearances and potential operational conflicts. Refer to the response to TfNSW in Table 4 below. It should be noted that TfNSW agreed to the proposed bus stop location and configuration approved under DA-2021/957.
Council-4	<i>DA-2021/957 required the removal of the Atchison Street vehicle slip lane to address footpath transitions and pedestrian safety. This remains a desired outcome for the site, particularly noting the increase density.</i>	Noted. The left turn from Atchison Street into Burelli Street is proposed to be signalised, in accordance with DA-2021/957. Gensis has incorporated the Atchison Street into Burelli Street upgrade into the SIDRA modelling within the updated TIA at Appendix M .
Subdivision / ownership / management arrangements		

Item	Matters Raised	Responses
Council-5	<i>Consideration should be given to the likely future subdivision / ownership / management arrangements.</i>	Noted.
Submission #2		
Design Excellence <i>The site is subject to the design excellence provisions under clause 7.18 of Wollongong Local Environmental Plan 2009. Key concerns with the current proposal regarding design excellence are as follows:</i> • 4(b) whether the form and external appearance of the proposed development will improve the quality and amenity of the public domain, • 4(e)(ix) pedestrian, cycle, vehicular and service access, circulation and requirements, • 4(e) (x) impact on, and any proposed improvements to, the public domain, • 4(e) (xi) achieving appropriate interfaces at ground level between buildings and the public domain, <i>The following concerns are raised regarding the subclauses above in terms of the public domain:</i>		
Council-6	<i>Under approved DA-2021/957, extensive work was done to establish the desired footpath levels and widths along with kerb alignments for the perimeter of the block [See SK01-SK12 /1 – Road Frontage Design dated 10/20]. Those design drawings involved lengthy consultation with relevant stakeholders within Council and Transport for NSW should be maintained under the current proposal as they are essential to achieving necessary street interface including pedestrian amenity, incorporating bus stops, taxi zones and the like. The approved detailed design drawings have been previously provided to the proponent and the State Design Review Panel (SDRP).</i> • <i>Levels, dimensions, existing / proposed boundaries need to be reflected on all relevant plan sets.</i> <i>The design of the public domain must be coordinated with Transport for NSW due to the implications for Crown Street, which is a classified road, including bus stop requirements, traffic generation, queuing and the like.</i>	It is noted that the requested level of detail is not required at this stage and detailed design documentation will be provided as part of a future CC stage, forming part of a Section 138 approval by Council. Nevertheless, the Updated Public Domain Plans at Appendix V have been prepared in consultation with Council, TfNSW and DPHI. The plans incorporate proposed public domain works within Crown Street, including footpath and kerb alignments, and demonstrate that the design can be delivered in a manner generally consistent with the desired public domain levels, dimensions and widths. Accordingly, the proposal establishes the feasibility of the required public domain outcome, with detailed design resolution to occur during the subsequent CC and Section 138 approval processes. Refer to the response to DPHI-9 and responses to items raised by TfNSW in Table 4.
Council-7	<i>Detailed sections and elevations from kerb to building entries are required that reflect these design drawings for the full frontage of the development to ensure level transitions from all street frontages and compliant footpath crossfalls.</i>	The Architectural Drawings (Drawings DA3000-DA3003 and DA3015-DA3018) at Appendix E include sections and elevations for the full frontage of the development. It is noted that the requested level of detail is not required at this stage and further subsequent detail will be provided as part of a future CC stage, forming part of a Section 138 approval by Council

Item	Matters Raised	Responses
Council-8	<i>The architectural drawings should include a greater number of visual representations of each building, entry point, public plaza areas, intersections and through links to understand the appearance, amenity and function of those spaces.</i>	3D renders of the proposed development from multiple angles are presented at Drawing Number DA3019, DA3020, DA3021, DA3022, AND DA3023 of the Architectural Drawings at Appendix E .
Council-9	<i>The northern link between the commercial building and hotel from the plaza to Keira Street is considered unnecessary and to result in CPTED concerns.</i>	the northern link between the commercial building and hotel from the plaza to Keira Street has been removed. For further detail see Drawing Number DA2003 within the updated Architectural Drawings at Appendix E .
Council-10	<i>The Burelli Street frontage requires further work to maximise active frontages. The retained section the Marcus Clark building (Spotlight) has no activation to Burelli Street and the degree of activation is substantially reduced from the approved scheme.</i>	Refer to the response to DPHI-5 and SDRP-10 .
Council-11	<i>The columns and recessed areas are a CPTED issue, appear to compromise accessibility for those with a vision impairment, and appear to have no real purpose.</i>	As outlined within the CPTED Report at Appendix L, the recessed areas and columns associated with the building overhangs serve a functional purpose by providing weather protection, supporting outdoor dining opportunities, and facilitating the integration of lighting and surveillance infrastructure. The CPTED implications of these spaces have been assessed and, in response to Council's concerns, the design has been amended to incorporate enhanced CCTV coverage, security lighting and wayfinding measures to improve visibility, passive surveillance and pedestrian navigation. These measures will ensure the spaces remain safe, legible and accessible, including for people with vision impairment. Accordingly, the recessed areas and columns do not give rise to unacceptable CPTED or accessibility outcomes.
Council-12	<i>The commercial tenancy in the south west corner on Burelli Street appears to create a sunken forecourt area. This precludes an awning and creates a setback area of questionable functionality given it is on the south side of the building where it will receive no sun and be heavily exposed to traffic noise. The commercial building line at that location may be better aligned closer to the street to address this issue (noting minimum footpath widths must be maintained – DA-2021/957 had a boundary setback of approximately 2m to accommodate increased pedestrian volumes and provide adequate circulation space).</i>	Refer to the response to DPHI-7. With regard to the resulting noise levels within this external space, the Updated NVIA at Appendix J measured noise level of 66 dB(A) $L_{Aeq}(15min)$, this noise level represents that which will be acoustically acceptable for the amenity of the commercial external areas and the area would be suitable for use including activities such as occupants using the area for lunch breaks and the like.
Council-13	<i>Plans for each building façade are too small and lacking in detail to enable a proper assessment. There are no dimensions provided.</i>	The Architectural Drawings (Drawings DA3004-DA3014) at Appendix E have been updated to provide additional detail on the building facades, including dimensions and materiality so as to enable a proper assessment.
Council-14	<i>Along the Crown Street frontage, attention should be given to the curvature of the building alignment in relation to the heritage listed 'West Crown St Shops' special area</i>	It is noted that the identified "West Crown St Shops" is not heritage listed.

Item	Matters Raised	Responses
	<i>to the north. In this location on Crown St the building alignment should curve in response to the curvature of the road. This curved section of Crown Street runs along a ridge line and was likely a traditional travel route. This more organic form responds more sensitively to the dominant landform and corresponding street alignment. At present the combination of angular building forms, flowing curved steps and the existing road curvature are not well aligned.</i>	The proposed Crown Street frontage achieves a positive urban design outcome and has been carefully designed in response to the established streetscape character and alignment. The setback and built form improve the pedestrian experience by facilitating a wider footpath and a more active street frontage, while maintaining consistency with the prevailing street alignment and the built form pattern on the opposite side of Crown Street. Accordingly, the proposal responds appropriately to its context and contributes positively to the public domain.
Council-15	<i>The internal plaza spaces and through site links are supported. The scale of these spaces in relation to their adjacent uses appears to work well. However, the level transitions between these spaces requires further design refinement to create a more generous, 'civic' environment which transitions more slowly between levels, rather than relying on long, straight flights of stairs</i>	Noted – Further work has been done to break up the run of steps to include generous landings and landscape zones for pedestrians to utilise, creating an informal amphitheatre space.
Council-16	<i>There appears to be little to no awning along the entire Burelli Street frontage and an awning should extend for the length of the Keira Street frontage including at the intersection to Keira and Crown at the lights.</i>	Refer to the response to DPHI-8 .
Council-17	<i>The street interface to Atchison Street and the corner at Burelli Street is not supported (see Lower Ground and Ground Floor). Other than the corridor entry to the commercial tenancies and residential lobby, there is no street activation or windows.</i>	Refer to the response to DPHI-5 and DPHI-6 .
Council-18	<i>The corridor entry configuration at the Atchison Street frontage is not supported due to CPTED concerns. It leads to commercial space that would likely be closed in the evening or difficult to tenant. This corridor space would be better occupied by a more generous residential lobby area similar to that approved under DA-2021/957 with a controlled entry point at Atchison Street.</i>	To respond to Council's concern, the size of the residential lobby has been increased. A larger residential lobby with a controlled entry point is now provided and supports stronger access control, improves territorial definition, and reduces the potential for spaces that could be misused for unintended activities. From a crime prevention perspective, this approach strengthens first and second generation CPTED outcomes by consolidating entry points and clarifying public and private domains. The proposal enhances control, visibility and defensible space, and with the integration of lighting and surveillance measures into the lobby design will ensure appropriate access control. For further detail see Drawing Number DA2004 of the Architectural Drawings at Appendix E and the CPTED Report at Appendix L .
Council-19	<i>The residential lobby to building 2.1 is poorly located from a wayfinding and accessibility perspective and should be designed to have frontage to a street with accessible path of travel (noting the proposed link from Atchison Street would not be accessible due to the grades of the footpath on Atchison Street).</i>	The Architectural Drawings (Drawing DA2005) at Appendix E have been updated to relocate the residential lobby to the Crown Street frontage to improve wayfinding and accessibility.

Item	Matters Raised	Responses
Council-20	4(c) whether the proposed development detrimentally impacts on view corridors: <i>The widening of the tallest tower further restricts views towards Mt Kembla (Jumbulla) from Flagstaff Hill. The View Impact Assessment demonstrates what is noted as 'moderate to severe' visual impact to the DCP view from Flagstaff Hill to the Illawarra Escarpment. Council disagrees with the VIA conclusion that 'within the context of the development's height compliance, the proposal can be deemed acceptable, since the highest value components of the view remain, along the Illawarra Escarpment, and distant views to the west are only partially impacted' (pg25). The view to Mt Kembla (Jumbulla) and Mt Keira (Djerra) are considered the highest value components of this view. Uninterrupted views to Mount Keira and Mount Kembla are considered vital due to their cultural and spiritual significance. These landmarks anchor Dreaming stories and traditional education. The Connecting with Country report (Artefact) fails to acknowledge the cultural significance of these view lines, and indeed fails to mention Mt Kembla at all except when citing Council's video 'Dharawal Country – Mt Keira and Mt Kembla'. In this video Auntie Shas notes the importance of views to the mountains as locators.</i>	As detailed within the Updated VIA at Appendix DD, from the selected Viewpoint (06), the visual impact and view loss caused by the new proposal relate to an area of the southern, descending ridgeline of Mt Kembla. An alternative viewing location, approximately 5m to the east of Viewpoint 06, would realign the tower's impact further to the south, beyond the extents of Mount Kembla. This would restore an uninterrupted view of this culturally and spiritually significant component. The particular viewing location from Flagstaff Hill was selected non-specifically and would not be representative of a defining viewpoint position in this area. The cultural significance can, as a result, be fully maintained from Flagstaff Hill from a multitude of other positions. A 'moderate-to-severe' classification is given within an assessment scale that extends from 'nil' to 'devastating' and, when reviewed in light of the comments above, is not in itself deemed unacceptable. The Connecting with Country Report at Appendix K has been updated with details of the provided video interview with Aunties from Dharawal Country on the importance of view to the mountains. Information has been added regarding the cultural value of the mountains and the potential design realisation of the views.
Council-21	4(d) whether the proposed development detrimentally overshadows the following— (i) an area shown distinctively coloured and numbered on the Sun Plane Protection Map, (ii) a site identified on the Overshadowing Map, <i>The plans submitted indicate overshadowing to MacCabe Park between 12-2pm which is contrary to the Sun Plane Protection Map under clause 8.3 of WLEP 2009 and clause 7.18(4)(d). The proposal must not overshadow any part of MacCabe park between 12-2pm mid-winter.</i>	The building design has been amended to mitigate overshadowing impacts and provide an outcome that complies with these requirements. For further detail refer to the response to DPHI-1.
Council-22	4(e)(ii) existing and proposed uses and use mix: <i>The development is in the heart of the Wollongong CBD – a location for major cultural entertainment including live music and 24 hour activity. The proposal is an opportunity to positively contribute to this. The development approved under DA-2021/957 achieved this objective with retention of The Grand as a pub and live music venue, incorporation of a cinema, health facilities and exhibition space. The majority of those components have now been removed from the proposal, which is disappointing, noting</i>	The proposal responds to current strategic priorities, including the emphasis on housing delivery. The proposal represents a balanced outcome, introducing a mix of uses including commercial, hotel, retail and non-retail components that will support the ongoing activation of the Wollongong CBD. The proposal includes ground floor activation to all street frontages at Kiera Street, Burelli Street, Crown Street and Atchison Street.

Item	Matters Raised	Responses
	<i>the hotel is positive addition. It should be demonstrated how the land use mix will contribute to the vitality of the CBD, particularly given the increase in number of residents arising from this development and other similar developments within the CBD.</i>	
Council-23	4(e)(iii) heritage issues and streetscape constraints: <i>Building 1 detrimentally encroaches above the Marcus Clark building (see further heritage comments below).</i> <i>The design retains a larger portion of the Marcus Clark façade where the development approved under DA-2021/957 retained a smaller more significant portion of that building. This allowed the main tower to hit the ground and have a stronger ground floor and podium presence.</i> <i>The retained portion has virtually no activation at street level.</i>	Refer to the response to DPHI-5 and Council-40. Keeping this additional section of elevation along Atchinson Street visually balances the section retained along Crown Street, particularly on approach along Crown Street from the west. This gives a stronger, not weaker, anchor to the tower. For further detail, see the Architectural Drawings at Appendix E for elevations and public domain levels for the Marcus Clark façade to reflect the uses at the Ground Level and Level 1.
Council-24	4(e)(iv) the location of any tower proposed, having regard to the need to achieve an acceptable relationship with other towers (existing or proposed) on the same site or on neighbouring sites in terms of separation, setbacks, amenity and urban form: <i>Council does not support the building separation between building 2.1 and 2.2. ADG minimums should be achieved. Having such minimal separation compromises the amenity of units and results in a form across the site that appears as one consolidated mass and limits views between towers.</i>	Noted.
Council-25	4(e)(viii) environmental impacts such as sustainable design, overshadowing, wind and reflectivity: <i>Meaningful sustainability measures must be incorporated into the development. This includes but is not limited to prioritising sustainable transport (bicycle parking, end of trip facilities, pedestrian amenity) applying a Greenstar rating to the development and capturing and reusing water on site. Council has supported for exhibition controls for the City Centre to mandate all electric development. The SEARs Ecologically Sustainable Design (ESD) Report does not consider electrification or the transition away from gas. The applicant is encouraged to progress with a fully electric development in order to improve indoor air quality and promote health by reducing exposure to air pollutants; and ensure new development is energy efficient and therefore cost effective for</i>	Refer to the response to SDRP-20.

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	<i>occupants over the long term, and can avoid future costs of electrification or remaining on the gas network.</i>	
Council-26	4(e)(xii) excellence and integration of landscape design: <i>The large number of street trees proposed along Crown Street and Keira Street do not appear to have been coordinated with known service locations and unlikely to be possible. Street trees within the footpath must be retained as the footpaths contain numerous services that would make it challenging to reestablish street trees.</i>	Refer to the response to SDRP-2. An underground site services search has been conducted, see the Infrastructure Delivery, Management and Staging Plan at Appendix X. Services and future tree planting will be coordinated to ensure impacts to existing and proposed street trees are minimised or mitigated. Detailed design of services connection will occur at a future development stage.
Street Trees		
Council-27	<i>Existing street trees within the footpath should be retained due to the difficulty in achieving any new comparable mature trees in their location due to the extent of existing services within footpaths.</i>	Existing street trees along Burelli Street have been retained and co-ordinated with Arborist, this is a result of the reduced setback along Burelli Street. Refer to the response to SDRP-2.
Council-28	<i>An arborist report should include a detailed management plan for each stage of development from demolition through to construction, for each of the trees proposed to be retained. For example; the establishment of hoardings, the removal of any pavement within the required Tree Protection Zones, any pruning required, service adjustments that may be necessary that impact upon the root zone and the basement excavation.</i>	A Tree Management Plan at Appendix S has been prepared to detail retained tree management for each stage of development.
Council-29	<i>Basements should be suitably set back from root zones.</i>	A Tree Management Plan at Appendix S has been prepared and details the tree protection zones, particularly highlighting potential encroachment with T4 and T11 along Burelli Street which has been considered in the updated basement design as shown in the Updated Architectural Drawings at Appendix E .
Council-30	<i>The proposal for street trees within blisters in the parking lane of Crown Street is supported, noting the number and species of trees will be dictated by required sight lines and clearances to the road reserve as well as services within the road. A 3D survey is required to understand what services are under the road. This would be at the developers expense.</i>	Noted. An underground services survey has been conducted, and further detail is available at the Infrastructure Delivery, Management and Staging Plan at Appendix X. The street trees within the blisters of the parking lane on Crown Street have been revised, see the Updated Landscape Plans at Appendix H. Refer to the response to DPHI-7 and SDRP-8.
Council-31	<i>The footpath for the entire frontage of the development will need to be reconstructed in accordance with the City Centre Public Domain Manual and the detailed design coordinated with Council.</i>	The Updated Public Domain Plan at Appendix V has been provided that was developed in coordination with TfNSW, for further detail refer to the response to DPHI-9. Requested footpath details will be designed for the S138 RDA at the post approval stage.

Item	Matters Raised	Responses
Awnings		
Council-32	<i>Awnings are required for the full frontage of the site. Heights of awnings should be managed to ensure maximum amenity and functionality.</i>	DKO Architects have prepared plans for an awning strategy. Refer to the Updated Design Report at Appendix F and Updated Architectural Drawings (DA3026) at Appendix E.
Publicly accessible areas throughout the site		
Council-33	Landscaped areas <i>For the successful establishment of canopy trees within the development, details of soil volumes based on mature tree sizes are to be provided.</i>	Refer to the response to DPHI-29.
Council-34	Safety and security <i>Safety and security throughout the site should be achieved through the building design and land uses (e.g. active frontages, passive surveillance, controlled access between public and private domain, removal of alcoves and concealment opportunities), rather than relying on reactive controls such as CCTV. The proposal creates a number of areas of concern as detailed elsewhere in this letter.</i> <i>Lighting: Internal areas that are accessible to the public should be appropriately lit.</i> <i>Sight lines/passive surveillance: any links through the site should be activated and provide suitably sight lines.</i> <i>Emergency access: This should be accommodated for any publicly accessible internal open space areas.</i>	Within Section 8.0 of the Updated CPTED Report at Appendix L, consistent emphasis is placed on passive surveillance, controlled access, and the clear separation of public and private domains across the site. This CPTED analysis is intended to be read both prior to and in conjunction with the accompanying architectural mark-up, enabling first and second generation CPTED principles to be understood and considered alongside the proposed design outcomes. These principles are applied in assessing the proposed design based on the architectural information available at the time of review. Where aspects of the design are identified as presenting potential security considerations, they are examined through a CPTED lens to understand both the inherent risks and the opportunities for mitigation within the current design framework. Lighting provision and sightline based passive surveillance are addressed throughout the report, with targeted recommendations documented where spatial conditions may influence visibility or informal oversight. Particular attention is given to areas that, by their layout or use, may experience reduced activation or clarity of purpose. In these instances, the report focuses on strengthening environmental and operational controls to reduce opportunities for misuse while working within the intent of the proposed design.
Council-35	Public art <i>The site must incorporate public art into the lobby areas of the larger buildings, forecourts and throughout publicly accessible areas within the site, in alignment with the objectives of Council's public art strategy (Animating Wollongong). A Preliminary Arts Plan should be prepared to respond to these opportunities in accordance with this policy. Any Arts Strategy must reflect the unique local context including Connection to Country.</i>	Refer to the response to DPHI-32.

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Council-36	Accessibility <i>The paths of travel for able bodied as well as for wheelchair, pram and mobility scooter users need to be considered given the varying topography across the site.</i> <i>Detail would be required to demonstrate how less able visitors will navigate the site (e.g. visually impaired, wheelchair users, elderly etc.).</i> <i>Council's Disability Inclusion Action Plan 2020-2025 indicates a lack of accessible parking throughout the LGA. There is an objective in the DIAP to Increase the number of accessible parking spaces. There needs to be sufficient accessible parking onsite at this development to support the key uses.</i>	Refer to the response to DPHI-25 and DPHI-58. The accessibility of the proposal is detailed within the Updated Accessibility Report at Appendix Z. From Kiera Street, a compliant level path of travel is provided to the building entry. This path is step-free and designed to accommodate wheelchair users, mobility scooter users, prams, elderly visitors and people with limited mobility. Access from Burelli Street is provided via a compliant passenger lift located immediately adjacent to the stairs. The co-location of the lift and stair follows best-practice universal design principles, ensuring that users can readily identify the accessible route without ambiguity. The lift provides direct access to the ground floor commercial tenancies only. This controlled access reduces confusion for visitors by clearly directing them to the primary commercial level and avoids unnecessary complexity in vertical circulation. In addition, level access is provided from Atchinson Street to the through site link. The east-west through site-link includes a compliant passenger lift located immediately adjacent to the stairs. Should a visitor approach from Burelli Street and be unable to use the stairs to access the through site link, clear signage will be provided directing them to the Atchinson Street entry. While this entry is located more than 50 metres away, the provision of advance wayfinding signage will ensure that users are informed of the nearest step-free alternative before committing to an inaccessible route. This supports independent navigation and minimises backtracking. Access from Crown Street to the building lobbies and retail tenancies is also provided at grade. These entries are step-free and directly connected to internal circulation areas, ensuring seamless movement between the public domain and commercial spaces. The proposal includes the provision of 55 accessible residential car parking spaces.
Acoustic Considerations		
Council-37	Impacts on night time economy <i>Consideration to any residential uses in close proximity to live entertainment uses and outdoor dining/drinking areas The design of the development should not compromise achieving the outcomes endorsed under the Wollongong CBD Night Time Economy Policy such as requiring limiting reasonable operating parameters.</i>	As discussed in the Acoustic Response to Submissions Letter at Appendix Y, based on the site location within the 'major activity cluster' of Wollongong City Council and the potential for activation of the public domain and the evening economy the following is discussed: The <i>Wollongong CBD Night Time Economy – Council Policy</i> includes recommendation which include the following:

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		The main objectives of this policy are to: 1. Enable the ongoing cultural evolution of the Wollongong CBD Night Time Economy. 2. Provide a consistent, clear and transparent assessment process for proponents. 3. Encourage a safe Night Time Economy that is comprised of vibrant and diverse businesses. 4. Foster good relations between residents of the Wollongong CBD and businesses which trade at night. 5. Concentrate appropriate venues within Wollongong LGA's established night trading precinct. ii. Based on the location of the site the potential for noise resulting from the use of the public areas, including street events and the like would have the potential to impact future residents of the project, however the resulting noise impacts would be acoustically acceptable based on the following considerations: a) The use of the public space for public events or the like would be limited in number and required to approved by council, which would include notification for residence within the area including period when the events where to take place. b) The events which would be undertaken on the public areas would include time restrictions such that impacts would be limited during night time periods. c) The design of the building includes an acoustic performance of the façade with upgraded acoustic glazing, including 10.38mm laminated and 6.38mm laminated (as detailed in Section 4.3.1 of the NVIA) with an Rw performance of the glass and frames of not less than 30 and 35 respectively. The resulting glass would also result in noise mitigations in the event of public events on the roadways. The required upgraded acoustic façade for traffic noise would also be sufficient for the mitigation of potential activity noise on the public area such that the acoustic amenity of future residence would be reasonably protected from the noise resulting the business zone (including activation beyond 5pm). d) It could be possible to include details of the Wollongong CBD Night Time Economy Council Policy within the sales documentation of the dwellings such that future owners would be aware of the proposed activation of the centre of Wollongong.

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		iii. <i>The Wollongong CBD Night Time Economy -Council Policy always includes comments regarding the requirements for venues to undertake acoustic assessments, including the following:</i> 2 RESIDENTIAL INTERFACE A venue or premises will be considered to have a residential interface where existing approved residential accommodation is located on an adjoining or adjacent site, or where the development site adjoins a residential zone. Adopted by Council: [Date] Page 2 Document No: 200604/20552
		WOLLONGONG CBD NIGHT TIME ECONOMY COUNCIL POLICY An acoustic report may be required where an application proposes to operate until or beyond 12am (midnight) and has a residential interface. The report must be prepared by a member of the Australian Acoustic Society or the Association of Australian Acoustic Consultants and be submitted with the development application. The report must assess the noise both indoor and outdoor and recommend a suitable attenuation plan to meet applicable noise criteria provided by the NSW Environmental Protection Agency, Independent Liquor & Gaming Authority and Liquor & Gaming NSW. Based on the details above any future venues within the centre of Wollongong and propose to include entertainment noise an acoustic assessment including details of potential impacts and required mitigations would be required to be undertaken. Page 4 of 11. iv. Based on the details included in the points above the potential noise resulting from potential activity noise would be acoustically acceptable including the details included within the Wollongong CBD Night Time Economy – Council Policy.
Demolition and Construction Management		
Council-38	Noise and vibration impact management	As discussed in the Acoustic Response to Submissions Letter at Appendix Y , as part of the NVIA, including Section 5 (<i>Construction Noise and Vibration Management Plan</i>), an

Item	Matters Raised	Responses
	<i>The locality is known to contain hard bedrock and a preliminary construction noise and vibration management plan will be needed to outline how noise and vibration impacts will be managed throughout the project.</i>	assessment of noise and vibration resulting from construction of the site has been undertaken. Details included within the NVIA includes the required construction noise and vibration management controls, community consultation, monitoring and complaints systems, which are required for the project to comply with the relevant requirements of the EPA <i>Interim Construction Noise Guideline</i> and other relevant requirements. As part of an SSD approval of the project it would be expected that a number of conditions would be included in any approval controlling construction activities on the site. This may include hours of use, development of a site specific management sub plan (once a building contractor is known), as well as community consultation and complaints systems. Details included in the NVIA include requirements for monitoring, community consultation and management of complaints. Details of the specific equipment will be assessed once a building contractor has been engaged and construction activities are known. Details of the specific methodologies and work methodologies will be undertaken as part of site-specific Construction Noise and Vibration Sub Plan. As part of the construction delivery of the project, site vibration monitoring and/or surveys will be undertaken to ensure construction vibration is within the project requirements.
Council-39	Management of pedestrian movement and bus waiting areas <i>Detail is to be provided as to how pedestrian movement and bus waiting areas will be accommodated during the demolition and construction stages noting the bus stop on Crown Street is the busiest in Wollongong.</i>	The Preliminary Construction Traffic Management Plan (CTMP) within the TIA at Appendix M has been updated with the following detail as requested: • Pedestrian: A-class hoarding will be provided to cordon off the construction site and pedestrian movements along the footpath. If necessary, B-class hoarding will be provided to ensure pedestrian movements are maintained. • Bus: No construction vehicles will enter the site or stop on Crown Street during the construction period. Accordingly, the existing bus stop and waiting areas on Crown Street are not envisaged be significantly impacted. A Final Construction Traffic Management can be required via an appropriately worded condition of consent.
Heritage		

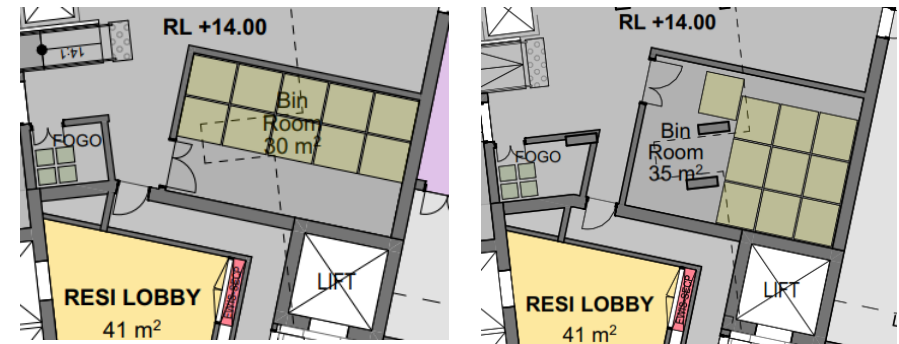
Item	Matters Raised	Responses
Council-40	Impact on heritage significance <i>The site includes the “Former Marcus Clark Building” which is listed as a Heritage Item under the Wollongong LEP 2009. Building 1 encroaches to a greater extent above the Marcus Clark building than the approved tower footprint under DA-2021/957 as illustrated below. This is not supported as it compromises the Clock Tower element being read as a prominent element in Crown Street and overwhelms the heritage item. It is recommended the built form is specifically designed to retain view corridors along Crown Street to the clock tower and to ensure the clock tower remains a prominent visual element in the streetscape. These impacts are not adequately considered in the Heritage Impact Statement.</i>	As can be observed in Viewpoint 02 in the Updated VIA at Appendix DD, the Clock Tower above the Marcus Clark building remains a very prominent visual element within the streetscape. The structural form of the Heritage Item is almost monolithic, with punched apertures at the first-floor level. These proportions and massing read very differently to the articulated, more open façade treatment of the new proposal above it. In particular, the clock tower continues the solid form of the heritage building elevational, in contrast to the proportions and materiality of the proposal to the rear. With this in mind, it is considered that the Clock Tower will continue to be a highly visible and prominent feature in the streetscape under a post development scenario.
Council-41	Impact on significant cultural views <i>View lines to Illawarra Escarpment and Mt Kembla are further impacted by height and built form as referenced in point 4(c) of Council's 6 November 2025 submission. The Connecting with Country Report and ACHAR do not adequately consider impacts to view lines as cultural values. It is recommended further assessment of the cultural values of views to the escarpment are undertaken and the proposed built form is designed to specifically retain the significant view lines and that celebration and interpretation of these view corridors is specifically included in Connecting with Country outcomes.</i>	When assessing the impact of the proposed building envelope, it is evident that only a small number of view locations experience any effect on the highest-value components of the outlook, namely the views toward Mt Kembla (Jumbulla) and Mt Keira (Djerra). Within the context of existing development and the anticipated future built form that will characterise the Wollongong CBD, the retention of uninterrupted escarpment views is not considered to be a realistic or achievable outcome. Any attempt to mandate such an outcome would significantly constrain the Council's own vision for the city's growth as a major commercial and residential hub on the NSW east coast. Taking this into account the proposed built form is considered to deliver on the Council's vision for the CBD, and balance this outcome appropriately with the need to mitigate view impacts as far as reasonably possible.
Council-42	Further inspections by Registered Aboriginal Parties <i>The ACHAR now prepared for the site as part of SEARs requirements recommends further inspection of an area of the site as requested by the South Coast People registered Native Title Group following partial demolition of concrete carpark in Figure 2 (Page 14). It should be considered how this is built into the any consent conditions to ensure this occurs at the appropriate stage and allow other Registered Aboriginal Parties to be consulted/notified.</i>	Noted.
Council-43	Purpose of Marcus Clark façade retention <i>Concern is raised over retaining the southern part of the Marcus Clark façade where retention of the façade appears to be for the purpose of concealing above ground car</i>	Refer to the response to Council-23.

Item	Matters Raised	Responses
	<i>parking which is not a positive heritage outcome. If this element is to be retained, it must be balanced with achieving a positive design and streetscape outcome.</i>	
Council-44	Construction impacts beneath Marcus Clark <i>Detailed and early consideration of the impacts of constructing basement levels and basement parking beneath the Marcus Clark building/façade is required to demonstrate constructability.</i>	The Structural Engineering Letter of Support at Appendix JJ confirms that the proposed retention scheme is structurally reasonable and compatible with the future permanent building framework.
Council-45	Maintain DA-2021/957 heritage conditions of consent <i>Heritage conditions imposed for the approved development under DA-2021/957 remain relevant and Council requests these requirements be considered for inclusion in any consent granted for the current proposal.</i>	Noted.
Waste Management		
Council-46	Minimising landfill <i>Separation of waste streams is essential to demonstrate sustainable design outcomes are achieved and ensure waste going to landfill is minimised.</i>	Noted. As detailed within the exhibited and updated Operational Waste Management Plan (OWMP) at Appendix W, all waste streams will be appropriately separated to ensure the amount of waste going to landfill is minimised.
Council-47	Private contractors are not an acceptable solution <i>Wollongong City Council is the Residential Waste Collection Authority and obligated to service all residential developments within the LGA. Private contractors are not an acceptable solution as Council has poor experience with legacy developments where this has occurred in the past. Council must charge owners a waste levy irrespective of whether Council or private waste contractors are used. If the proposal is not designed to Council contractor standards Council will bear a considerable financial burden. This is why it is most important for the proponent to work to Council contractor standards as outlined below.</i>	As detailed within the exhibited and updated OWMP at Appendix W, Council is confirmed as the collection authority for residential general waste, recycling and FOGO in accordance with Council's collection schedule. A private contractor will be engaged to service the retail and commercial general waste and recycling bins as per an agreed collection schedule
Council-48	Amendment to Council's DCP waste requirements <i>Council's Waste Chapter of the DCP (Chapter E7) is currently being reviewed due to problems with lack of waste storage impacting on building amenity. Moving forward until the Waste Chapter has been properly updated, the applicant needs to provide general waste storage of 120L per unit per week, recycling storage of 120L per unit per week.</i>	As detailed within the exhibited and updated OWMP at Appendix W , Council's rate is adopted, with general waste storage of 120L per unit per week and recycling storage of 120L per unit per week provided.

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Council-49	Lack of temporary storage for bulky items <i>A dedicated room or caged area must be provided for the temporary storage of discarded bulky items which are awaiting removal in accordance with the EPA Better practice guide for resource recovery in residential developments.</i>	As detailed within the exhibited and updated OWMP at Appendix W , a dedicated bulky waste room is provided for the residential component for the temporary storage of discarded bulky items which are awaiting removal.
Council-50	Waste management concerns <i>Effective waste management is compromised by the following aspects of the current design:</i> <i>A FOGO receptacle must be located on each floor of the residential buildings to facilitate the convenient disposal of food waste.</i> <i>Tower 1 (38 storeys) does not provide a space on each floor for disposal of recyclable materials or FOGO.</i> <i>Each level of the building must provide space for both recycling waste and FOGO to minimise the waste going to landfill (e.g. 240L bins located adjacent to the general waste chutes).</i> <i>It is unclear how/where retail tenancies will dispose of their waste, particularly where tenancies may be occupied by food and drink premises.</i> <i>The commercial, hotel and retail spaces must have access to FOGO.</i>	Refer to the response to Council-51c and Council-51f .
Council-51a	Issues with Operational Waste Management Plan: <i>Section 5.1 – Total Waste/Recycle bins have been slightly overstated. Council cannot supply capacity that is not being paid for. The bin totals have been adjusted as shown in red text below:</i>	As detailed within the updated OWMP at Appendix W , all bin quantities have been rounded up per room, as a single bin cannot be partially allocated or shared between two chute rooms. The calculations in the table are based on managing waste volumes per core rather than across the development as a whole. The red-marked calculations assume a single chute system by dividing the total development-wide volume using the overall bin size and collection frequency, which does not reflect the per-core operational arrangement.

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Table 2: Estimated Waste and Recycling Volumes – Residential						
Building/ Core	# Units	General Waste Generation Rate (L/unit/week)	Generated General Waste (L/week)	Compacted Waste 2:1 (L/week)	Recycling Generation Rate (L/unit/week)	Generated Recycling (L/week)
BLD 1	222	120	26640	13320	120	26640
BLD 2.1	55	120	6600	3300	120	6600
BLD 2.2	82	120	9840	4920	120	9840
BLD 2.3	84	120	10080	5040	120	10080
BLD 3	103	120	12360	6180	120	12360
TOTAL	546		65520	32760		65520
Bins & Collections		General Waste Bin Size (L)	1100	1100	Recycling Bin Size (L)	1100
		General Waste Collections per Week	1	1	Recycling Collections per Week	2
		Total General Waste Bins Required	60	30	Total Recycling Bins Required	30
Bins per Building/ Core		Building/ Core	# Bins	# Bins	Building/ Core	# Bins
		BLD 1	25	12	BLD 1	12
		BLD 2.1	6	3	BLD 2.1	3
		BLD 2.2	9	4	BLD 2.2	5
		BLD 2.3	10	5	BLD 2.3	5
		BLD 3	12	6	BLD 3	6

| Council-51b | Section 5.4.1 states that a single chute will be provided for each residential tower. Building 1 appears to show 2 chutes (which may be due to the number of apartments). No space is provided for disposal of recyclable materials which is not supported. Provision must be made for convenient disposal of both recyclable materials and FOGO for residents on each floor in the form of a 240L bin. | As discussed within the Updated OWMP at **Appendix W**, Building 1 will retain the two chutes (one for general waste, and the other for recycling). FOGO will be maintained as being disposed of within a communal bin room. |
| Council-51c | Section 5.4.2 – A FOGO receptacle must be located on each floor along with the waste and recycling disposal options (e.g. a 240L green FOGO bin). The current proposal does not encourage the correct disposal of food waste; residents will take the easy option and put it in the waste chute. | As outlined within the Updated OWMP at **Appendix W**, the proposed arrangement will retain the communal FOGO bin room in the basement. This approach reflects Elephant Foot Consulting’s recommendation to mitigate odour impacts and reduce operational labour associated with rotating bins on each level, while also supporting regular bin-room washdowns and minimising spillages, pests, vermin and associated odour issues. The communal FOGO rooms are located within Basement Level 01, see Drawing DA2001 of the Architectural Drawings at **Appendix E** for more details. |

Item	Matters Raised	Responses
Council-51d	<i>Section 5.5 – The bin holding area looks very congested and will be difficult to manoeuvre bins in this space. Council's collections contractor will not navigate this space; this would fall to the building manager to move them out to the loading area.</i>	As outlined within the Updated OWMP at Appendix W the supermarket is no longer included in the proposal, the bin storage rooms now benefit from increased spatial capacity. This additional space provides sufficient circulation and allows for effective bin rotations during collection periods and chute management.
Council-51e	<i>The recycle bin storage area for building 2.3 is not big enough, the bins will not be able to move around easily.</i>	As outlined within the Updated OWMP at Appendix W and the Updated Architectural Drawings at Appendix E, the recycle bin storage room has increased from 30m² to 35m². It is noted that the placement of the proposed structural columns within the bin room remains subject to further review during subsequent design stages. For confirmation of the increased size, see Figure 1 below.  Exhibited recycling bin room for Building 2.3 Proposed recycling bin room for Building 2.3
Council-51f	<i>Section 6.1 & 6.2 & 7.1 & 7.2 & 7.3.2 – There are no FOGO provisions for the commercial, hotel and retail spaces. There is a mandate coming into effect on 1 July 2026, the qualifying generation rates are here Business food waste EPA. Council will be responsible for ensuring compliance and space will be needed for commercial businesses in new buildings. FOGO must be included for these spaces.</i>	The Updated OWMP at Appendix W has been updated with amended calculations and provisions to include FOGO for non-residential components. The Updated OWMP identifies that food organics (FO) will comprise over 30% of the total commercial and retail waste stream, to be provided and collected at the following rate: <u>Retail tenancies:</u> • General Waste: 9 x 1100L bins collected 7 x weekly. • Recycling: 8 x 1100L bins collected 7 x weekly. • FO: 12 x 240L bins collected 7 x weekly.

Item	Matters Raised	Responses
		<u>Commercial tenancies:</u> • General Waste: 2 x 1100L bins collected 3 x weekly. • Recycling: 3 x 1100L bins collected 3 x weekly. • FO: 2 x 240L bins collected 5 x weekly.
Council-51g	<i>Section 16 – It is unclear where the bin room/s for the commercial and retail spaces as listed in table 11 are located, therefore the suitability of the proposed services cannot be assessed (noting separate waste facilities for the hotel and supermarket appear to be catered for). The waste management procedures and facilities for the retail and commercial premises must be detailed, particularly noting there are likely to be numerous food and drink premises generating substantial volumes of waste.</i>	Refer to Appendix A.1 of the Updated OWMP at Appendix W for labelled bin rooms and their specific locations, including retail, commercial, hotel and residential bin rooms.
Council-51h	<i>Section 6.5 – The proposal for the supermarket waste services is unclear and not identifiable on the supplied plans ('near the loading area' is not satisfactory). The provisions need to have more detail and certainty as to how the waste will be managed.</i>	Not applicable. The proposed development no longer includes a supermarket tenancy,
Council-51i	<i>Section 8.1.4 – More detailed methodology is required to explain where the collection points will be for problem waste and how the streams will be managed. Additional problem waste streams need to be added to the list and outlined how these will be managed, including gas bottles, stationery, and textiles.</i>	Noted. The building manager will be responsible for problem waste and will coordinate the management and disposal of such waste with a private contractor, as detailed within the Updated OWMP at Appendix W. Problem waste may be added to the existing bulky waste room as an additional area, at the discretion of the building manager at an operational stage.
Council-51j	<i>Section 14 – Council does not approve the installation of hitches to its infrastructure as this voids warranty and decreases the lifespan of the bin.</i>	Noted.
Council-52	Purpose of compactor on Basement 1 <i>It is unclear what the compactor on the Basement 1 plan is to be used for noting that there is no information in the OWMP.</i>	The compactor will be used for the retail or commercial tenancies, subject to the needs of the future tenants.
Council-53	Bulky waste management <i>Detail how large volumes of cardboard and packaging will be managed when residents move in and out of the towers.</i>	Management of bulky waste is provided within the originally submitted Operational Waste Management Plan (Appendix EE of the EIS).

Item	Matters Raised	Responses
Car parking, access and servicing		
Council-54a	Car parking credits <i>The previous development used a number of car parking credits. Chapter E3 of the Wollongong City Council DCP allows credits for non-residential “redevelopment which does not cause any net increase in the demand for car parking”. In this case, Clause 3.4.2 (5) of Chapter E3 of the DCP allows car parking credits to be applied if a development is operating lawfully in accordance with development consent. The credits are used where a lawful land use exists, and the car parking rates for that land use form the basis of any credit assessment applied. There should not be any surplus car parking as it will exacerbate traffic impacts within the city centre and may be leading to the extent of above ground car parking that compromises the above ground built form (e.g. street activation, linkages through the site, residential amenity, wayfinding and the like).</i> <i>The reduction in car parking within the site under the previous proposal was seen to benefit the town centre area surrounding the site through reducing the traffic generation potential and lessened future traffic signal delays.</i>	As detailed within the TIA at Appendix M , car parking credits for non-residential uses apply to the site, and car parking has been provided in accordance with the car parking rate derived by applying the car parking credit under Clause 7.5 of Chapter E3 of the DCP. This DCP rate is 1 space per 60m ² , and the rate derived through application of car parking credits is 1 space per 330m ² . Based on the parking rate with applied car parking credits, the retail and commercial parking requirement is 52 spaces, and as such only 52 car parking spaces for retail and commercial uses are proposed at the site.
Council-54b	<i>The residential car parking spaces must be separate and secure from residential visitor spaces.</i>	Residential parking will be separated from visitor and non-residential car parking areas with boom gates.
Council-54c	<i>Residential visitor spaces must also be separate from commercial car parking spaces. Sharing of commercial and residential visitor spaces will result in those spaces frequently being occupied by non-residential uses and compromise visitation to residents.</i>	
Council-55	Publicly available car share <i>To further support the reduced car parking provision, and in the interests of helping to reduce car ownership within the site as well as the surrounding area, Council would need to see a meaningful proportion of car parking spaces within the site identified as ‘car share parking spaces’ which must be publicly accessible and managed by a registered car share provider (this is common in metropolitan developments) where car share users have access to secure areas using their car share swipe card to access vehicles within the development.</i>	Refer to the response to DPHI-14 .
Council-56	Adaptable Car Parking Spaces	Not applicable as AS4299 and its requirement for 3.8m wide car parking spaces is no longer in use.

Item	Matters Raised	Responses
	<i>Council requires 10% of all residential units to be capable of adaption for people with disabilities as per AS4299. Car parking space dimensions must also comply with AS4299 and be 3.8 metres wide. It is noted that the proposed layout shows 'disabled' car parking spaces with a shared area as per AS2890.6 which is only relevant for non-residential disabled drivers. This layout issue will require amendment.</i>	
Council-57	Stacked car parking spaces <i>Any proposed stacked car parking spaces must be allocated to the same residential unit or retail, commercial or hotel premises.</i>	Noted. Stacked car parking spaces are not proposed.
Council-58	Bicycle parking <i>The proposed commercial, hotel, and retail staff bicycle spaces and all residential bicycle spaces must be provided within secure compounds with a self-closing door and combination keypad. There must be adequate manoeuvring space for users to wheel their bicycles in and out of the enclosures.</i>	The Architectural Drawings at Appendix E have been updated to include all bicycle parking spaces within secure storage cages.
Council-59	Lack of visitor bicycle parking <i>There must be provision for bicycle parking spaces for visitors to commercial components, which currently appears to be lacking.</i>	The Updated Architectural Drawings at Appendix E includes an increased provision of 13 bicycle parking spaces for commercial visitor parking.
Council-60	Bicycle end of trip facilities <i>The proximity of bicycle parking to the bicycle 'end of trip facilities' is unsatisfactory as shown. Many of the bicycle spaces are some distance from the showers and lockers, and on different levels etc. Bicycle parking needs to be adjacent to lockers and showers to promote good sustainability habits. If the bicycle parking is in different areas, it will reduce the appeal of cycling and not be convenient enough to encourage users to cycle rather than drive.</i>	Refer to the response to DPHI-20 .
Council-61	Green Travel Plan <i>The applicant is proposing a Green Travel Plan. It will be important to ensure that the Green Travel Plan includes the above incentives, such as publicly available car share spaces, end of trip facilities with nearby secure bicycle parking (an internal 'sustainable hub'). The Green Travel Plan will need to include site-specific measurable targets for future mode share and must include ongoing monitoring.</i>	The Updated TIA at Appendix M includes details of the incentives within the Green Travel Plan as well as stipulating site-specific measurable targets. Refer to the response to DPHI-14 .
Council-62	Lack of EV charging facilities	Refer to the response to DPHI-14 .

Item	Matters Raised	Responses
	<i>Provision for Electric Vehicle Charging Facilities as per the National Construction Code will need to be demonstrated.</i>	
Council-63	Traffic generation and intersection/network impacts <i>SIDRA modelling has been carried out, and the proposed accesses were found to operate within an acceptable level of service.</i>	Noted.
Council-64	Parking impacts on surrounding streets <i>The preference is for the development to utilise car parking credits (only able to be applied for non-residential uses), but to provide sufficient residential car parking, and adequate provision for residential visitors to ensure that there are no additional impacts in nearby residential streets.</i>	As demonstrated in the Updated TIA at Appendix M the proposed development provides sufficient residential and visitor car parking and does not rely on car parking credits for residential or visitor parking provision.
Council-65	Street Frontages/Public Domain <i>Atchison Slip Lane: The left turn from Atchison Street into Burelli will be required to be signalised and the zebra crossing removed to address pedestrian safety and manage traffic circulation around the site. The detailed design of this corner must be undertaken in consultation with Council and Transport for NSW. Any changes must be accompanied by SIDRA modelling.</i> <i>Crown Street Bus Stops: The location and design of the bus stop and associated infrastructure (shelters, signage) on the Crown Street frontage must be coordinated with Transport for NSW.</i>	<u>Atchison Slip Lane:</u> The left turn from Atchison Street into Burelli Street is proposed to be signalised, with the zebra crossing and pedestrian island removed to address pedestrian safety and manage traffic circulation around the site. Gensis has incorporated the Atchison Street into Burelli Street upgrade into the SIDRA modelling within the Updated TIA at Appendix M. Detailed design in relation to the signalisation of the left turn will require design inputs from SGC for civil layout and levels, a signalling consultant approved by TfNSW and external audit by an accredited auditor with TfNSW. This is a detailed design that is requested to be conditioned at this stage. <u>Crown Street Bus Stops:</u> Location of bus stops on the Crown Street frontage has been coordinated with Transport for NSW and further detail is available at the Updated TIA at Appendix M.
Council-66	Loading Facilities <i>Information has been provided within the Traffic Report regarding the dwell times for delivery vehicles. If all matters are addressed, a condition will be required to ensure that the building manager is responsible for coordinating loading and deliveries within the loading dock.</i>	Noted.
Council-67	Delivery requirements <i>Detailed consideration of likely delivery requirements (food, online shopping, moving vans, taxis/uber, and locations, paths of travel etc.)</i>	A Preliminary Freight and Delivery Management Plan has been developed within the Updated TIA at Appendix M and details the vehicle access strategy, delivery schedules, and operational guidelines to ensure the effective servicing of the site.

Item	Matters Raised	Responses
Council-68	Preliminary Construction Traffic Management <i>A Preliminary Construction Traffic Management Plan is required to identify ways to mitigate impacts on public roads and manage safety for pedestrians and drivers in this busy town centre area.</i>	A Preliminary Construction Traffic Management Plan was provided in the originally submitted TIA (Appendix T of the EIS).
Apartment Design Guide (ADG)		
Council-69	<i>Council notes that an assessment of the development under the ADG will be undertaken by the Department as consent authority. It is noted that separation distances are far below the recommended minimums under the ADG and clause 8.6 of WLEP 2009, particularly between buildings 2.1 and 2.2 (~7m proposed - 24m minimum required).</i>	Noted.
3D Model		
Council-70	<i>An electronic 3D model of the development must be provided to Council. Council's mapping Services can be contacted for accepted file formats.</i>	A 3D model of the development has been provided to Council via email.
Council endorsed documents / policies		
Council-71	<i>It is requested that the following endorsed documents / policies be considered in the assessment:</i> • <i>Our Wollongong Our Future 2035 Community Strategic Plan (2025)</i> • <i>Wollongong City Centre Urban Design Framework 2020</i> • <i>Wollongong Retail and Business Centres Strategy (2023)</i> • <i>Wollongong Housing Strategy</i> • <i>Wollongong Heritage Strategy</i> • <i>Wollongong Tourism Accommodation Strategy</i> • <i>Sustainable Wollongong 2030: A Climate Healthy City Strategy</i> • <i>Wollongong Climate Change Mitigation Plan</i> • <i>Wollongong Climate Change Adaptation Plan (CCACP)</i> • <i>Wollongong Urban Heat Strategy (2023) (action of CCAP)</i> • <i>Wollongong Waste and Resource Recovery</i>	Noted. Refer to the Updated Statutory Compliance Table at Appendix C .

Item	Matters Raised	Responses
	• <i>Urban Greening Strategy</i> • <i>Wollongong CBD Night Time Economy</i> • <i>Wollongong Transport Strategy 2025-2035</i> • <i>Wollongong City Centre Access and Movement Strategy</i> • <i>Wollongong Cycling Strategy 2030</i> • <i>Draft Wollongong City Centre Movement and Place Plan</i> • <i>Economic Development Strategy</i> • <i>Animating Wollongong – Public Art Strategy 2022-2032</i> • <i>City Centre Public Domain Technical Manual</i>	

1.4 Government Agencies

The Applicant's responses to the received government submissions are outlined in **Table 4** below.

Table 4 Government Agency Submissions

Item	Matters Raised	Responses
Transport for New South Wales		
Bus stop relocation		
TfNSW-1	The existing bus stop on the Crown Street frontage of the development site is a significant bus stop within the Wollongong CBD. The TfNSW letter dated 1 November 2022 details the minimum suitable arrangements that the redevelopment of the land must provide to adequately cater for buses, bus passengers and pedestrians at the eastern end of Crown Street frontage. TfNSW has been unable to locate sufficient information (i.e. a plan) that shows the requirements in the above letter relating to the bus stop in Crown Street have been adequately addressed. TfNSW requires a plan that details the following: a) The length of the bus zone that is a minimum of 55m to provide sufficient length for three buses to utilise the bus stop at the same time, including any of the three buses to exit upon completion of boarding. This 55m includes a minimum 6m draw out length at the start of the bus zone (the eastern end). Refer to Section 3.7 of the State Transit Bus Infrastructure Guide, Issue 2. In achieving the 55m, it should be noted:	The Updated Public Domain Plans at Attachment V have been amended by SGC to reduce the taper. The proposed bus zone is now 55.5m and the length of the bus bay has been amended to 49m as requested.
TfNSW-2	The plan submitted (Public Domain Concept Design, prepared by S&G Consultants Pty Ltd with reference Project No. 20240207, Dwg No. SC02-C301, Revision A Dated 24.04.25) includes a 20m taper. The taper represents the draw out length, and this can be reduced to 6m provided the angle of the kerb (between the widened kerb line and the existing kerb line) is appropriate to allow a bus to draw out. This will need to be supported with a swept path analysis for a 12.5m bus.	
TfNSW-3	The above referenced Public Domain Concept Design plan includes a 43.5m bus zone. Excluding the draw out length described above, the bus zone needs to be a minimum 49m in length.	
TfNSW-4	b) More details are required of any change to the kerb alignment that is proposed at the corner of Crown Street and Keira Street. This includes a swept path assessment	A swept path analysis of a 12.5m bus turning left from Keira Street onto Crown Street within the kerb side bus lane has been provided within the Updated TIA at Appendix M to

Item	Matters Raised	Responses
	<i>for a 12.5m long bus turning left from Keira Street onto Crown Street within the kerb side bus lane with the proposed kerb change.</i>	demonstrate that the bus zone is an appropriate area to allow a bus to draw out. Additionally, the kerb alignment at the intersection of Crown and Kiera has been amended to reflect the approved civil design layout by Council.
TfNSW-5	<i>c) The bus stop design must ensure there is no lip or step within the bus zone. Cross sections shall be provided to demonstrate the levels comply with applicable requirements.</i>	Noted. Level 33 is comfortable addressing this matter at the detailed design stage and requests that this item be conditioned.
TfNSW-6	<i>d) Details of the regulatory signage locations for the start and end of the bus zone.</i>	The Updated Public Domain Plans at Appendix V detail the location of the regulatory signage for the start end of the bus zone.
Crown Street Footpath		
TfNSW-7	<i>a) TfNSW supports the provision of a widened public domain area to accommodate and appropriately separate pedestrians from passengers waiting to board buses. TfNSW requires that this widened area commence at the start of the bus zone (i.e. the western sign location) and extend to the eastern end of the bus zone, or as close to this point as reasonably practicable. The depth of the public domain area at the bus stops, defined as the space between the kerb and the property boundary allocated for bus passengers and pedestrians, must be a minimum of 5.3 metres.</i> <i>TfNSW notes that the Environmental Impact Statement (prepared by Ethos Urban, Version 4.0 dated 22/09/2025) states in Section 7.7.5 (Bus Stop Relocation) that a "minimum of 5.3 metres has been provided between the kerb and the building line from the front of the first bus, refer to Appendix B". However, TfNSW has been unable to locate the required details in Appendix B. Plans showing the above detail need to be provided.</i>	Noted. The Public Domain Plans at Appendix V have been amended to address this item.
TfNSW-8	<i>b) Insufficient information has been provided to enable TfNSW to support the kerb widening and the associated reduction in travel lanes on Crown Street, as well as a pedestrian crossing that is proposed within the Crown Street kerb widening (refer to S&G Consultants Pty Ltd Public Domain Concept Plans). To enable TfNSW to undertake an assessment, plans are required that:</i>	Noted. The Public Domain Plans at Appendix V have been amended to address this item, and the revised layout is shown on the plans which outlines the pedestrian crossing and kerb widening on both sides of Crown Street.
TfNSW-9	<i>Detail compliance with Point 1 and Point 2a (TfNSW 1-7 above)</i>	Noted. The Public Domain Plans at Appendix V have been amended to address this item.
TfNSW-10	<i>(i) Detail the provision of a corresponding widening/blister/kerb extension on the northern side of Crown Street, which will reduce the crossing distance across Crown Street and will encourage pedestrians to cross. Without any</i>	Noted. The Public Domain Plans at Appendix V have been updated to include the indicative location for potential road widening works at the northern side of Crown Street, subject to further consultation.

Item	Matters Raised	Responses
	kerb widening on the northern side of Crown Street, pedestrians will be encouraged to cross between parked cars and cars undertaking parking manoeuvres. This would create an unacceptable safety risk. The provision of corresponding kerb widening on the northern side of Crown Street would provide pedestrians with a safer crossing location. This crossing point should not give pedestrians priority, but rather provide the infrastructure required to assist pedestrians in choosing a gap in traffic to safely cross Crown Street. An associated 'No Stopping' zone must be provided in accordance with TfNSW Technical Direction for Pedestrian Refuges TDT2011/01a.	
TfNSW-11	Sight distance assessment at the crossing point to demonstrate compliance with applicable requirements in Austroads. TfNSW notes that the landscape plan shows planting adjacent to the new kerb line in Crown Street, however, is unclear on the species proposed and their impact on available sight distances.	The Landscape Plans at Appendix H have been amended following coordination with traffic in relation to sight distances. Accordingly, the proposed species have clear stems for sightlines and are identified as Tristaniopsis laurina- Water Gums. This will be further coordinated Post DA as part of the Public Works documentation.
TfNSW-12	c) Insufficient information has been provided to enable TfNSW to assess whether the proposed outdoor dining area, that is located within the newly widened public domain along Crown Street as shown in the Landscape Architectural Drawings prepared by Land+Form, complies with applicable separation requirements from state roads (i.e. a minimum of 2.5 metres from the face of the kerb unless a TfNSW certified road barrier is agreed upon and installed) and to confirm that the proposed works will not adversely impact the Crown Street public domain.	The Landscape Plans at Appendix H have been amended to provide a minimum 3m-wide footpath along Crown Street, from boundary line to back of kerb. This will be further coordinated Post DA as part of the Public Works documentation to WCC standards.
TfNSW-13	TfNSW also notes inconsistencies between the Detailed Landscape Plan prepared by Land+Form (Drawing No. LD-DA101, Revision 1, dated 15.09.2025) and the Public Domain Concept Design prepared by S&G Consultants Pty Ltd. For example, the pedestrian crossing shown in the concept design is not reflected in the landscape plan. Furthermore, both the Environmental Impact Statement and the Traffic Impact Assessment are silent on the proposed outdoor dining along the Crown Street frontage.	Noted. The Landscape Plans at Appendix H have been amended to address this item and ensure consistency with the Public Domain Plan.
Changes to traffic signals		
TfNSW-14	TfNSW notes that modifications to existing traffic signals are proposed as part of the current SSD application. To enable assessment of the proposed changes, the following additional information is required:	A concept traffic signal plan was prepared by Stantec in support of the approved development scheme. This plan is reproduced in Attachment 1 of the Traffic Statement prepared by Genesis.

Item	Matters Raised	Responses
	a) <i>Burelli Street, Kenny Street and Findlay Place signalised intersection: TfNSW notes that the proposed light vehicle access to and from Burelli Street will necessitate alterations to the existing signalised intersection of Burelli Street, Kenny Street and Findlay Place. The documentation submitted with the current SSD application does not provide sufficient detail for TfNSW to confirm the full scope of works at this intersection, demonstrate that it can be designed and built in compliance with applicable requirements (e.g. Traffic Signal Design Guide, etc) and enable TfNSW to provide its in-principle approval to the works.</i>	While it is acknowledged that the concept Traffic Control Signal plan does not include the full level of detail requested in TfNSW's comments, this assessment considers that the proposed addition of a new intersection car park access leg to the existing traffic signals can be designed to meet relevant standard requirements without undue difficulty. Accordingly, the detailed design elements, along with TfNSW consultation, can be deferred to the subsequent design documentation stages.
TfNSW-15	<i>In addition to the above, the plans must clearly show:</i> i) <i>the easement required to allow TfNSW access for maintenance of all traffic signal related infrastructure;</i> ii) <i>details on how right turns from Burrelli Street into the development site will be prevented (refer to Point 8 for additional details; and</i> iii) <i>the location of all poles, lanterns, cabling, loop detectors and pedestrian/kerb ramps.</i> <i>TfNSW also notes that the proposed pedestrian crossing width should be 3.6m wide in accordance with the TfNSW Traffic Signal Design Guide.</i>	i) The maintenance easement requirements can be reflected on the detailed TCS plan during the relevant design documentation phase. ii) The prohibition of right turns from Burelli Street into the development car park is expected to be implemented through appropriate 'No Right Turn' signage, with details to be provided during the subsequent design documentation phase. iii) The required new poles, lanterns, cabling, detectors, kerb ramps, etc. can be accommodated within the currently proposed intersection footprint. These elements will be documented in the detailed design, which will be subject to TfNSW assessment, consultation, and approval The signalling designer has to amend the existing signalling at that intersection to include a new traffic light for left turn from Atchison in Burelli and it is requested that be conditioned, in addition to the crossing being 3.6m wide. Further detail is provided in the Updated Public Domain Plans at Appendix V.
TfNSW-16	<i>b) Atchison Street/Burelli Street intersection: Clarification is required regarding the proposed changes to the Atchison Street/Burelli Street intersection. TfNSW notes that the Traffic Impact Assessment (prepared by Genesis Traffic, Job No. 24179, Version 5 dated 30.07.2025), references the upgrade works at this intersection, specifically, the removal of the existing slip lane on Atchison Street and its replacement with two full lanes. However, other submitted documentation, including the Public Domain Concept Plan prepared by S&G Consultants Pty Ltd, indicates that no upgrade works are proposed and instead shows only the repainting of the existing pedestrian crossing.</i> <i>TfNSW considers that, given the expected increased pedestrian and cyclist activity generated by the development, the removal of the existing pedestrian crossing and</i>	The Public Domain Plans at Appendix V have been amended by SGC to reflect the removal of the slip lane and the signalised intersection as the approved arrangement by TfNSW. Further detail is provided in the Updated TIA at Appendix M.

Item	Matters Raised	Responses
	<i>installation of traffic signals would provide a safer and more accessible connection to Wollongong Train Station, while also mitigating potential road safety issues associated with the development.</i>	
TfNSW-17	<i>For both a) and b) above, TfNSW requires a concept/strategic design for the identified works/upgrades to be prepared before the determination of the current SSD application. The strategic design provided shall address the requirements as detailed in the TfNSW Strategic Design Requirements for DAs fact sheet (refer to the following link - Strategic Design Requirements for DAs Factsheet (August 2024). This will, in part, clarify the scope of works, demonstrate that a compliant design can be provided, and allow DPH&I, as the consent authority, to consider any environmental impacts of the works as part of their Part 4 assessment under the Environmental Planning and Assessment Act 1979.</i>	A concept design plan has been prepared by Genesis as per TfNSW Strategic Design Requirement Factsheet, refer to the Updated TIA at Attachment M .
Pedestrian connectivity		
TfNSW-18	<i>TfNSW notes that the previously approved plans under DA-2021/957 provided substantial pedestrian access through the site in both east/west and north/south directions, facilitated by the development site having similar ground level RLs at the south western and north eastern corners of the development site. While the currently submitted plans maintain a north/south pedestrian connection, the proposed design does not optimise east/west pedestrian movement through the site, which TfNSW believes will be significant, noting the location of the train station to the west and the Wollongong Central Business District to the east. TfNSW strongly supports improving east-west pedestrian permeability across the development.</i>	The proposal now includes an east/west link via a connection between the two north/south links.
SIDRA modelling		
TfNSW-19	<i>a) The electronic files for the SIDRA modelling that has been undertaken. This includes modelling for the removal of the pedestrian crossing and its replacement with signal infrastructure at the Atchison Street/Burelli Street intersection.</i>	SIDRA modelling has been updated by Genesis. Refer to the Updated TIA at Appendix M .
TfNSW-20	<i>b) Details on how the base model has been calibrated with on-site observations (e.g. queue lengths, delays, etc) need to be provided.</i>	
TfNSW-21	<i>c) Confirmation that the required information relating to the operation of existing signals (e.g. phasing, pedestrian times, etc) used in the SIDRA modelling has been obtained from TfNSW.</i>	

Item	Matters Raised	Responses
TfNSW-22	<i>d) The modelling provided to show an exclusive pedestrian phase to prioritise pedestrians at the Burelli Street, Keira Street and Findlay Place signalised intersection. This is due to the nature of the development and to reduce delays for vehicles waiting to turn at Kenny Street. Similar arrangements are already in place at the Kiera and Burelli Street intersection.</i>	
TfNSW-23	<i>e) Update the modelling so that the base year used is the date of opening of the proposed development, with the future/10 year scenario being the base year + 10 years.</i>	
TfNSW-24	<i>f) Details on any SIDRA defaults that have been changed, along with supporting justification.</i>	
Service vehicle access		
TfNSW-25	<i>TfNSW notes that the submitted plans propose relocating the service vehicle access further to the west compared to the location approved under DA-2021/957. This change positions the access closer to the signalised intersection of Burelli Street, Kenny Street and Findlay Place. TfNSW does not support the relocation of the service vehicle access closer to the signalised intersection for the following reasons: a) The proposed relocation would create additional conflict points and result in safety and efficiency issues for westbound traffic along Burelli Street, including bus operations.</i>	Council's concern regarding the impact of the relocated access on westbound traffic is acknowledged. To address this potential issue, a raised median strip will be provided along Burelli Street (in front of the service access) to physically deter westbound vehicles from turning right into the relocated loading dock access.
TfNSW-26	<i>b) The proposed location does not comply with the requirements of the TfNSW Traffic Signal Design Guideline – Section 2, which stipulates that signalised mid-block marked pedestrian crossings must be located at least 30 metres from a side street. TfNSW classifies the proposed service vehicle access as a side street for the purpose of this requirement. Accordingly, TfNSW requests that the service vehicle access be repositioned to align with the location previously approved under DA-2021/957, with this amendment shown on updated plans.</i>	The intent of the prescribed 30m separation is to protect pedestrians from an oncoming turning vehicle (from the driveway in this context), i.e. risks associated with trucks turning from the driveway onto Burelli Street. This is no longer applicable in the context of the proposal because the introduction of a median strip means that service vehicles will only be permitted to turn left when departing the loading dock, travelling away from (not towards) the midblock pedestrian crossing. The request to reinstate the service vehicle access to its originally approved location (DA-2021/957) is acknowledged. However, the scheme being subject to other urban planning design requirements, including the provision of a pedestrian through-site link which occupies the location of the originally approved service vehicle access, precludes this from being achievable.

Item	Matters Raised	Responses
		Also of relevance is that the approved scheme was designed to accommodate a 20m articulated semi-trailer, while the proposal no longer needs to accommodate this type of vehicle. This is because it will no longer offer a supermarket element, reducing the loading dock's design service vehicle to a 12.5m HRV. In relation to TfNSW's concern of the service access being in proximity to the traffic signals, the removal of the need for semi-trailers (20m) will result in additional available lane storage between the driveway and the intersection's departure lane. However, it is understood the development will be subject to an average of six (6) service vehicle movements per day (not all HRVs) only, representing a relatively lightly used access driveway. If it is deemed necessary by TfNSW, Level 33 is open to the potential of restricting service vehicle access during the road network's AM and PM peak hours, and this may be reflected in the associated Operations Plans of Management or Loading Dock Management Plan.
Right turn restrictions		
TfNSW-27	<i>Right turns into the development from Burelli Street should be prevented to minimise adverse impacts on network efficiency, given the existing function of Burelli Street, which accommodates multiple bus routes as well as a bus stop adjacent to the site (southern side of Burelli Street).</i> <i>TfNSW holds concerns that, without appropriate measures to prevent right turns from Burelli Street, the future development may adversely affect bus operations due to the existing bus stop on the southern side of the street, the constrained road environment, and the potential for traffic conflicts in this area.</i>	Right turns into the basement car park will be prohibited and enforced by 'No Right Turn' signage. Right turns from Burelli Street into the service access will be restricted by a median strip extending from the eastern edge of the driveway to the traffic signals. Refer to the Updated TIA at Appendix M.
Post box relocation		
TfNSW-28	<i>TfNSW notes the presence of two post boxes and an associated collection area within the Crown Street road reserve. The information provided, including the Public Domain Concept Design prepared by S&G does not identify the proposed relocation location for these post boxes or include written confirmation from Australia Post regarding their relocation and acceptance. Details on how the above have been addressed shall be provided.</i>	The proposed changes in that section of Crown Street are not anticipated to impact on the location and servicing of the existing post boxes. These are identified as retained on the Updated Public Domain Plans at Appendix V.
Other comments		

Item	Matters Raised	Responses
TfNSW-30	Roads Act 1993 <i>a) At this time, TfNSW has not provided its 'in principle' concurrence under Section 138 of the Roads Act 1993 for the works that are proposed and/or required within the state road reserve. In addition, TfNSW has not provided its required approval under Section 87 of the Roads Act 1993 for the proposed changes to traffic signals. In principle, approval for both shall be obtained before the SSD application is determined.</i>	Noted.
TfNSW-31	Swept paths <i>b) TfNSW notes that the swept path analysis for service vehicle access to Burelli Street (refer to Attachment 5 in the Traffic Impact Assessment prepared by Genesis Traffic, Job No. 24179, Version 5 dated 30.07.2025) demonstrates that service vehicles are unable to enter and exit the property simultaneously. This outcome is unacceptable, as it would require service vehicles to wait within the through lane of Burelli Street. Revised designs shall be submitted showing that the largest service vehicles can enter and exit the site simultaneously, maintaining all required clearances and appropriate design speeds.</i>	To accommodate simultaneous passing, the driveway needs to be widened to at least 20m as per AS2890.2. It is unlikely that such a width could be accommodated within the site constraints. Furthermore, a driveway of this width is not desirable from a pedestrian safety perspective, particularly given the high pedestrian activity in the area. From a design perspective, a 20m servicing entrance is not a good design outcome and would lead to pedestrian safety concerns. Instead, this can be appropriately addressed through implementation of management measures detailed within the Freight and Delivery Management Plan provided at Section 6 of the Traffic Impact Statement (Appendix T of the EIS). A condition of consent requiring a final FDMP to be submitted for approval demonstrating acceptable management measures is sufficient to address this comment.
TfNSW-32	Largest vehicle size <i>c) Noting the size of the development, the mix of uses and the change of occupiers that will occur over time, further justification is required on why a swept path for a 17.5m semi-trailer has been used as opposed to a 19m semi-trailer.</i>	Refer to the response to DPHI-49 .
TfNSW-33	Section 2.120 of State Environmental Planning Policy (Transport and Infrastructure) 2021 <i>d) The provisions of Section 2.120 (Impact of road noise or vibration on non-road development) of State Environmental Planning Policy (Transport and Infrastructure) 2021 apply to the submitted application as the annual average daily traffic volume along this section of the Crown Street is more than 20,000 vehicles (refer to 'Traffic Volume Maps for Noise Assessment for Building on Land Adjacent to Busy Roads' - Map 18C).</i> <i>As such, the developer will need to demonstrate to the satisfaction of the determining authority (DPH&I) that the SSD application can comply with provisions contained in Section 2.120 of State Environmental Planning Policy (Transport and Infrastructure)</i>	Refer to the response to DPHI-23 .

Item	Matters Raised	Responses
	2021 specifically in relation to measures to ensure the required noise levels as detailed in Subclause 3 are not exceeded when the building is ready to be occupied.	
Conservation Programs, Heritage and Regulation		
Biodiversity		
CPHR-1	Streamlined assessment A small area streamlined BDAR was applied in conjunction with the Planted Native Vegetation module, in accordance with Appendices B and C of the Biodiversity Assessment Method (BAM) 2020, respectively. This assessment approach is consistent with the BAM. The Wollongong Local Environmental Plan 2010 (WLEP) does not specify a minimum lot size for the site. Therefore based on the subject site's total area of 1.31 hectares, the total native vegetation clearing must not exceed 2ha for the BAM small area module to apply. The proposal will result in the removal of 0.04ha of native vegetation, thus the small-area module was applied appropriately.	Noted.
CPHR-2	Vegetation mapping The proposed development has largely been located within areas devoid of native vegetation, within an existing built, urban environment. Native vegetation within the site consists only of select native planted Eucalypts within a landscaped carpark and exotic vegetation. The native vegetation was assigned to Plant Community Type (PCT) 3191: South Coast Ranges Moist Gully Forest in the BDAR. Adequate justification is provided in the BDAR and CPHR support this PCT selection. No ecosystem credits will require offsetting for the proposal, due to the low Vegetation Integrity (VI) Score of the vegetation.	Noted.
CPHR-3	Threatened species One threatened flora species, Magenta Lilly Pilly (<i>Syzygium paniculatum</i>) was recorded within the subject site. This species is widely cultivated, and the individual was likely to have been planted within the site for landscaping purposes. This individual is not part of a self-sustaining, naturally occurring population. Therefore, no further assessment of impacts to this species is required as per the NSW survey guide for the BAM: Surveying Threatened Plants and Habitats (DPIE 2020). No threatened species habitats were recorded within the site. The project will not require offsetting of species credits.	Noted.

Item	Matters Raised	Responses
Trees and Landscaping		
CPHR-4	Supportive of species selection <i>The Landscape Plan does meet the Secretary's requirements for landscaping. The species selected for future planting includes a range of locally native species. From a biodiversity point of view, less desirable species such as Agapanthus and English Ivy have been included in the Landscape Plan, however given that the site does not adjoin sensitive environmental areas, the risk of these species spreading and becoming an environmental weed is very low.</i>	Noted.
CPHR-5	Supportive of tree removal, retention and planting <i>The AIA satisfies the Secretary's requirements regarding assessing the number, location, condition and significance of trees to be removed. A total of 17 trees are present within the site, all of which are proposed for removal. Six trees adjacent to the site along Atchinson and Burelli Streets will be retained. No significant trees are present. Ultimately, if approved, the proposed development will increase the number and diversity of trees within the site, also increasing the % canopy cover. This is broadly consistent with NSW Greener Places Framework.</i>	Noted.
Flooding		
CPHR-6	Flood comments <i>The site is not mapped as flood prone, however, a sliver of land within the road reserve north of the site adjacent to Crown Street is identified in the Wollongong City Flood Study 2019 as an area with 'potential minor flooding' due to inundation south-east of the site.</i> <i>A Flood Desktop Review Report (S&G Consultants, August 2025) has been submitted with the EIS (Appendix BB). The existing flooding extent as mapped by the Wollongong City Flood Study 2019 is confined within the road reserve, and the proposed development is not predicted to exacerbate the flooding extents. The EIS concludes that the proposed development will not reduce the existing flood storage volume and will not adversely impact existing flood hazard and flood behaviour.</i> <i>We remain available to provide further detailed advice to DPHI if required, including following consultation with Wollongong City Council as holders of the most up-to-date flood information for this locality.</i>	Noted.

Item	Matters Raised	Responses
Recommended Conditions of Consent		
CPHR-7	Pre-clearance fauna survey <i>No more than 7 days prior to demolition of buildings, a suitably qualified and experienced Ecologist is to be commissioned to undertake an extensive pre-clearing survey, searching roof cavities of existing buildings for microbats. If microbats are not detected, no further action is required prior to demolition works. In the event that microbats are detected within existing buildings, consultation with the Project Ecologist will be required to determine the most appropriate timing for demolition works.</i>	Noted.
	Tree protection <i>Retained trees along Atchison Street and Burelli Street are to be protected in accordance with the Australian Standard 4970-2025 Protection of Trees on Development Sites.</i>	Noted.
	Landscaping <i>Landscaping is to be installed in accordance with the approved Plan following completion of construction activities.</i>	Noted.
	Weed management <i>Exotic vegetation must be disposed of appropriately offsite.</i>	Noted.
	Stormwater management <i>Water sensitive urban design is to be implemented as per the approved Plan (Integrated Water Management Report, S&G Consultants, August 2025).</i>	Noted.
	Erosion and sediment control <i>Erosion and sediment control devices are to be installed prior to any construction activity on the site in accordance with the approved plan. These devices are to be maintained for the full period of construction and beyond this period where necessary.</i>	Noted.
Heritage NSW		
Aboriginal Cultural Heritage		

Item	Matters Raised	Responses
HNSW-1	Preparation of an unexpected finds policy <i>Recommend an unexpected finds policy be prepared prior to the commencement of works.</i>	Noted. This was recommended in the originally submitted Aboriginal Cultural Heritage Assessment Report (Appendix U of the EIS).
Historical Archaeology		
HNSW-2	Removal and retention of the archaeological resource <i>It is recommended that a new figure or Figure 8.1 in the report be updated to clearly identify where the archaeological resource will be removed and where it will be retained within the proposal. Heritage NSW otherwise considers the Historical Archaeological Assessment to generally address SEARs Requirement 19 for an Archaeological Assessment for SSD-76440958. However, it notes that it has not been asked to assess or consider the Statement of Heritage Impact prepared for Requirement 19 of the SEARs.</i>	The Updated Historical Archaeological Assessment at Appendix P has been updated to include an added sentence under 'Legislative mitigations' in Section 8.2 (page 70): <i>"Moreover, given the identified areas of archaeological potential relative to the proposed development footprint, in situ retention of archaeological fabric is generally not possible."</i> Further, A separate SoHI document has been completed by Weir Phillips Heritage. For Heritage NSW's consideration, heritage impact considerations included in the Guidelines for preparing a SoHI are included in Table 8.1 of the Updated Historical Archaeological Assessment.
HNSW-3	Historical archaeological resource management <i>The following is recommended to manage the historical archaeological resource:</i> <i>An Archaeological Research Design and excavation methodology should be submitted to Heritage NSW for comment at the response to submissions stage. This document should nominate an excavation director who meets Heritage NSW's excavation director criteria.</i> <i>As mitigation for the impact on the archaeological resource, consideration should be given to conveying the significance and findings of the archaeological investigation to the public through a Heritage Interpretation Plan. Refer to the <u>Interpreting Heritage Items and Places Guidelines</u>. Site interpretation should occur in a publicly accessible space.</i>	The Updated Historical Archaeological Assessment at Appendix P has been updated to address the HNSW requirements as follows: - Requirement included in Recommendations 1a and 1b, and in Section 8.2 (page 70). - Requirement included in Recommendations 2 and 2a.
NSW SES		
Flooding issues		
SES-1	Consideration of relevant policies, manuals, guidelines and legislation <i>it is recommended that consideration of flooding issues is undertaken in accordance with the requirements of NSW Government's Flood Prone Land Policy as set out in the Flood Risk Management Manual 2023 (the Manual) and supporting guidelines,</i>	The site is not directly affected by flooding, as indicated in the Wollongong City Flood Study (2019). Based on the available flood data, the site does not appear to be directly impacted by the 1% AEP and PMF flood extent, which is confined to the road reserve. The existing site levels are such that the site falls within the flood freeboard extents, therefore the floor levels will be set at minimum 500mm above the 1% AEP flood level.

Item	Matters Raised	Responses
	including the Support for Emergency Management Planning and relevant planning directions under the Environmental Planning and Assessment Act, 1979. Some of the key considerations relating to emergency management are further detailed in Attachment A.	
SES-2	Risk of isolation and emergency access/egress Recommend considering overland flooding impacts on the access/egress roads for the precinct (including any new proposed access) and the broader road network, as part of the risk assessment, and ensuring that any emergency management constraints (such as risk of isolation and emergency access/egress) are addressed.	Refer to the response to SES-1 .
SES-3	Basement design Advise that basement car parks have inherent risks to life and property and can often restrict safe evacuation of the occupants during flooding. This can be managed through building design, such as crest levels above a certain level (e.g. the PMF) to prevent water ingress and flooding. We recommend ensuring that all openings to the basement (ramp, vents, etc) are situated above the Probable Maximum Flood (PMF) or 1% AEP plus freeboard, whichever is higher, or reconsidering basement carparking if this is not feasible to reduce risk to life and property.	Refer to the response to SES-1. Furthermore, access into the basement is not from the lowest point on the site and would not be affected by overland flows. The standard crest in the driveway will suffice to ensure that the basement is protected from stormwater entry.
SES-4	Shelter in place strategies Recommend ensuring consistency with the Shelter in Place Guidelines including the considerations and design criteria listed, as the site is subject to flash flooding. The consistency should be documented in the Flood Impact and Risk Assessment report.	Not applicable. Refer to the response to SES-1 .
SES-5	Consistency with the NSW Independent Inquiry Advise pursuing, if relevant, site design, stormwater management and Flood-Resilient Infrastructure, consistent with the NSW Independent Inquiry, to withstand extreme weather events to promote resilience and reduce the impact of floods and other hazards on communities. Any improvements that can be made to reduce flood risk will benefit the community. We recommend liaising with Council regarding potential stormwater upgrades, and alignment with the Wollongong Floodplain Risk Management Study and Plan. This will ensure climate risk assessment is included for adaptation and resilience to natural hazards like flooding and storms.	Not applicable. Refer to the response to SES-1 .
SES-6	Climate change	Not applicable as the PMF flood extents do not reach the site. Refer to the response to SES-1 .

Item	Matters Raised	Responses
	<i>Recommend considering the impacts of climate change. It is estimated that the actual probability of a 1 in 100 AEP for this catchment area is approximately a 1 in 56 AEP event for the current 2025 scenario. For the proposed development site, this could result in more frequent inundation and/or isolation than what is currently expected based on previous modelling.</i>	

1.5 Organisations

The Applicant's responses to the organisation submissions received are outlined in **Table 5** below.

Table 5 Organisation Submissions

Item	Summary of Matters Raised	Responses
Citi 1 Owner's Committee		
Citi-1	Building Height <i>Firstly, the height of residential building 2 at 42 levels is seen to be excessive and unnecessary. This tower will be constructed on an already elevated site, making it even higher than the proposed 42 level height. The height also appears to exceed the existing LEP height limit that applies to Central Wollongong.</i>	Refer to the response to DPHI-2 .
Citi-2	Overshadowing <i>Add to this, the shadow line cast by such a tall structure and the impact on other residences within this shadow. Buildings to the South will be in permanent shadow and have extremely limited access to daylight, especially in Winter when the sun's angle is greatly reduced. The residents of our building in particular will be greatly impacted by this. We suggest that the height of this tower be reduced to that of the other 2 towers and that the proposed residences be evenly distributed across all 3 towers.</i>	The subject site has previously been assessed as a site suitable for mixed- use development including high density residential and overshadowing impacts deemed acceptable.
Citi-3	Surrounding character <i>Aesthetically, a tower of this magnitude will be oppressive and overbearing in the small area that is Crown Street. It is not an appropriate placement for such a building.</i>	The site is located within the Wollongong Town Centre, a highly urbanised area planned to accommodate higher-density, mixed-use development. The site has previously been assessed as suitable for high-density residential and mixed-use development, reflecting its central location and proximity to public transport. The proposed development responds to its context by providing a mix of shop-top housing, commercial and retail uses, and visitor accommodation. At street level, the podium is designed to reflect the established scale and character of Crown Street, with double-height retail and lobby spaces, stepped awnings, and an active frontage that maintains a pedestrian-focused high-street environment. The building's form and materials have been carefully designed to reduce visual bulk and respond to Wollongong's character, drawing on the area's landscape and industrial heritage through articulated façades and a refined material palette.

Item	Summary of Matters Raised	Responses
		The retention and integration of the Marcus Clark Building and Grand Hotel heritage façades ensure that important heritage character is preserved and celebrated as part of the redevelopment. Overall, the proposal balances increased height within the town centre with appropriate street-level scale, heritage retention, and architectural articulation, and is not considered to result in an oppressive or overbearing outcome along Crown Street.
Citi-4	Insufficient parking allocation <i>The second concern is that of parking. There appears to be an insufficient allocation of parking space, especially the number allocated to the proposed hotel. 29 spaces is in no way adequate. Parking in Wollongong CBD is in short supply and one wonders where hotel guests are going to park. There also appears to be limited commercial parking available. With a 10 storey office complex, a 166 room hotel, retail tenancies and a supermarket, an increase in parking availability is essential and needs to be addressed before construction commences.</i>	The provision of car parking aligns with the strategic direction of the LGA to reduce parking within the Wollongong CBD.
Endeavour Energy		
EE-1	Adequate electricity services <i>The Infrastructure Delivery, Management and Staging Plan prepared by Neuron Date 2025-07-31 - Revision 02 includes the following advice addressing electricity services are available and adequate for the proposed development.</i> EXISTING POWER INFRASTRUCTURE There is multiple existing substation on the current site. These chamber substations will need to be decommissioned and removed. An Application to Endeavour Energy will be needed for this decommission. PROPOSED ELECTRICAL SERVICES Stage 1 of the site will likely require two new chamber substations each containing two 1,500kVA transformers. Stage 2 will likely require two mini-chamber substations each containing a 1,000kVA transformer.	Noted. The final substation arrangement and supply is subject to formal certification of an ASP3 design as part of the next development phase.
EE-2	Substation's location and protection <i>The copy of the Mezzanine Plan shows provision for two indoor substation chambers to the Keira Street road frontage of the site. Any required distribution substation/s will</i>	Noted. This is a standard condition and will be achievable. Further information is provided within the Infrastructure Delivery, Management and Staging Report at Appendix X.

Item	Summary of Matters Raised	Responses
	<i>need to be located within the property (in a suitable and accessible location) and be protected (including any associated cabling not located within a public road / reserve) with an appropriate form of property tenure as detailed in the attached copy of Endeavour Energy's 'Land Interest Guidelines for Network Connection'.</i> 	
EE-3	No objection • Endeavour Energy has no objection to the application.	Noted.

1.6 Public

The Applicant's responses to the public submissions received are detailed in **Table 6** below.

Table 6 *Public Submissions*

Item	Summary of Matters Raised	Raised in	Responses
Community amenity and infrastructure			
PS-1	Lack of community amenity and infrastructure (including public open space) - The revised proposal represents a significant reduction in community amenity compared to the previously approved development. - Key community facilities removed from the proposal include a cinema complex, public swimming pool, community hub, and publicly accessible green open space. Request the reinstatement of community amenities or meaningful alternatives, - Wollongong CBD is currently without a cinema, highlighting the importance of reinstating this cultural facility. - The removal of these amenities reduces opportunities to activate the precinct, support social interaction, and enhance day- and night-time use. - The proposal is considered inadequate in delivering quality of life and residential amenity for a high-density inner-city precinct. - Concern that the revised scheme prioritises increased development scale and commercial outcomes over community benefit. - Central Wollongong is already lacking green open space, mature tree canopy, and areas for respite, and the proposal does not adequately respond to this deficiency. - There is limited provision for children and families, including a lack of accessible ground-level play spaces and publicly usable recreational facilities. - Proposed recreational amenities such as pools and gyms appear to be private rather than publicly accessible. - Many submitters such as public or outdoor cinemas, publicly accessible green space, rooftop or hanging gardens, and inclusive recreational facilities.	15 submissions	The proposal continues to deliver significant public benefit, providing high-quality outcomes for residents and the broader community. The proposal accommodates an upgraded public domain including green streetscapes and significant tree canopy cover across the development. Through-site links, internal plazas, and green spaces are generous in size and scale, creating a public domain that fosters efficient pedestrian mobilisation, improved permeability of the built form, and forms a high-quality pedestrian experience. The proposal also considers existing community amenity, specifically McCabe Park, which provides public open space immediately proximate to the site. Solar access is preserved and aligns with the provisions and objectives of the ADG. To promote a lively and vibrant environment for the community, the proposal is also supported by a Preliminary Public Art Plan at Appendix EE which intends to integrate meaningful and interesting art into the area, including potential sculptural and suspended works. Refer to the response to Council-22.

Item	Summary of Matters Raised	Raised in	Responses
PS-2	Comments on lack of support for other community shortages - Acknowledging the housing shortage, the proposal does not adequately respond to broader community shortages and constraints. - Continued high-density residential development in Wollongong is occurring without evidence of sufficient demand or occupancy, increasing the risk of poor urban outcomes. - The proposal is considered to exacerbate existing deficiencies in supporting infrastructure, including public transport, parking, schools, healthcare, recreational facilities, and public open space. - There is a lack of coordinated infrastructure planning to accompany large-scale population increases associated with major developments. - The development is seen as failing to adequately address liveability, residential amenity, environmental impacts, and social outcomes for future residents. - Concentrating large numbers of residents in high-rise buildings without sufficient supporting infrastructure may lead to overcrowding, social conflict, and reduced quality of life. - Without adequate social and physical infrastructure, the proposal risks contributing to urban crowding without liveability and eroding Wollongong's character and community wellbeing.	4 submissions	The Applicant will pay contributions in line with Wollongong City Council's 7.12 Contributions Plan including that which applies to the Commercial Core, and the Housing and Productivity Contributions. These contributions will go towards a range of local, regional, and state infrastructure including transport, schools, healthcare, recreational facilities, and public open space. Therefore, the proposal adequately addresses anticipated community impacts and perceived/real shortages. It is intended that the proposal will include augmentation of servicing infrastructure relating to electrical and hydraulic services and utilities. As detailed within Section 7.17 of the EIS and further in Appendix HH to the EIS. These upgrades align with already anticipated future onsite services, infrastructure, and facilities proposed on site.
Consultation process			
PS-3	Lack of public hearing - A public hearing is considered necessary due to the scale, complexity, and CBD location of the proposed development. - Community consultation is viewed as inadequate, with a short exhibition period, poor publicity, and limited notification of nearby residents and affected stakeholders. - Many people became aware of the revised proposal only through local media rather than formal planning or council communication channels.	9 submissions	The community consultation undertaken throughout the duration of the SSDA has been completed in accordance with the SEARs requirements and the <i>Undertaking Engagement Guidelines for State Significant Projects</i>, including: - Engaging with relevant NSW Government agencies, Council, close neighbours and targeted members of the community. - Informing the surrounding community of the site about opportunities to gain further information and consult with the project team.

Item	Summary of Matters Raised	Raised in	Responses
	- The absence of a public hearing is seen as limiting transparency, public scrutiny, and meaningful participation in the SSD assessment process. - The process is perceived to undermine confidence in decision-making and accountability for a major development, with concerns also raised about the level of information available to Wollongong City Council during exhibition.		- Explaining how community feedback will be considered and documented. - Providing relevant information about the proposal to ensure that potential impacts are understood. - Providing a variety of different methods of communication to provide feedback. An Engagement Report and Community Engagement Table have been provided at Appendix M and Appendix D of the EIS, respectively. These confirm the engagement activities have been completed to a high standard. Further, the 14 day exhibition period on the Planning Portal fall outside of the control of the Applicant and within the remit of DPHI. The holding of a public meeting as required by a number of community members would be at the discretion of DPHI. It is acknowledged the proposal represents a significant development within the Wollongong City Centre. As part of the works undertaken to prepare the application, community and stakeholder engagement was undertaken. A variety of engagement tools were utilised to ensure the community was notified of the proposal, and provided with the opportunity to comment on the proposal prior to lodgement of the application. These tools included: - Notice distribution to properties in proximity to the site - An online survey - A public notice in the Illawarra Times - Various media articles about the proposal - A Community Information Webinar. As detailed in the Engagement Report, the engagement tools generated a volume of submissions from the community and agencies providing feedback on various aspects of the proposal.

Item	Summary of Matters Raised	Raised in	Responses
			As the application has utilised the SSDA pathway, the application is not advertised on the Council website.
PS-4	Lack of engagement information and short notice period - Community engagement is considered inadequate due to limited information, lack of direct notification, and insufficient transparency in the exhibition process. - Many affected residents report receiving no written notice or direct communication regarding the revised proposal or its public exhibition. - The notification process is viewed as unclear and inconsistent with the Department's Community Participation Plan, with concerns about the adequacy of the notification radius. - The exhibition period is regarded as too short for a State Significant Development, with calls to extend the timeframe to allow meaningful review and consideration of the amended proposal. - The fact that the application does not appear on Wollongong City Council's DA tracking system is seen as compounding difficulties for the community to stay informed. - The level of engagement is viewed as falling short of expectations for a major development affecting the city centre and local residents. - Requests are made for re-exhibition of the proposal with broader written notification, a clearer explanation of notification methods, and a longer exhibition period to support effective community participation.	4 submissions	Refer to the response to PS-3 .
Pedestrian connectivity and safety			
PS-5	Lack of all-weather dedicated pedestrian connections - The proposal does not provide all-weather, dedicated pedestrian connections to adjacent Crown Central shopping centres, despite such connections existing between the neighbouring centres. - The inclusion of similar connections is requested.	2 submissions	Connection of the proposal to the Wollongong Central shopping mall is outside the scope of the development. An over road connection, such as those that exist between the existing mall fragments, represent a poor public domain outcome that prioritises vehicles rather than pedestrians. Such a connection also results in extensive planning complexities and land ownership matters.

Item	Summary of Matters Raised	Raised in	Responses
			While these sort of pathways are not generally supported from a planning or design perspective, public domain upgrades have been proposed in alignment with Council's vision for the site and the surrounding area, and TfNSW's requirements. Notwithstanding the above, development consent does not restrict these works from occurring in the future.
PS-6	Lack of pedestrian thoroughfares - The proposal is considered to provide insufficient pedestrian thoroughfares and cross-block connections between surrounding streets, including Crown Street and Keira Street. - Limited pedestrian permeability is seen as reducing connectivity to the city centre and surrounding retail areas and potentially diverting pedestrian activity away from established streets. - The dominance of internal transport access and internalised retail and plaza spaces is viewed as drawing activity inward and weakening the public streetscape. - Concerns are raised that inadequate pedestrian connections may negatively affect pedestrian amenity, safety, passive surveillance, and local business activity. - There are calls for additional pedestrian laneways through the site, frequent and fully glazed entries along all street frontages, and active retail uses addressing surrounding streets to reinforce connectivity and streetscape vitality.	2 submissions	The proposal provides two distinct connections between Crown Street and Burelli Street through the provision of a through-site link and plaza. It is the role of these thoroughfares to promote pedestrian permeability and encourage foot traffic through the site, supporting retail frontage. It is also noted that Council is supportive of the connections, including their scale, as discussed in their comments at Council-15.
PS-7	Quality of footpaths Footpaths surrounding and providing access to the development must be of sufficient quality and design to accommodate high pedestrian volumes.	1 submission	Public domain upgrades have been proposed in alignment with Council's vision for the site and the surrounding area, and with TfNSW's requirements. Further details are provided at Appendix V.
Bulk and scale of development			
PS-8	Building height and density The development is considered excessive in height, bulk, and density for its CBD location and the scale of surrounding development.	9 submissions	The proposal utilises additional height on the site under the Housing SEPP's affordable housing scheme, allowing RFB development and shop top housing an additional 30% above that provided by the

Item	Summary of Matters Raised	Raised in	Responses
	- The proposed number of high-rise towers, residential units, and vehicle spaces is viewed as resulting in overdevelopment of the site. - The revised proposal is seen as a significant intensification beyond the previously approved development, which was generally regarded as more appropriate for the site. - Building heights of up to 26, 38 storeys and approximately 156 metres are considered disproportionate to Wollongong's established built form and coastal character. - Concerns are raised that the proposal sets an undesirable precedent for future skyscraper-style development in the city. - The scale and massing of the buildings are viewed as creating an oppressive streetscape, particularly along Crown Street. - The placement of taller buildings closer to Crown Street is considered inconsistent with the previously approved setback arrangement, which kept high-rise elements away from the street edge. - The proposal is seen as unsympathetic to nearby low-rise and heritage retail buildings, resulting in a perceived imbalance in scale and visual dominance. - Calls are made for reductions in building height and density, increased setbacks, and a more sensitive design response to maintain light, amenity, and pedestrian enjoyment within the city centre.		Wollongong LEP 2009. By providing 15% of its floorspace towards affordable housing, the proposal is afforded the entire 30% height bonus. The proposal is entirely compliant with this height with the exception of a minor exceedance at a portion of Building 2.2 and Building 2.3. This is supported by a Clause 4.6 Variation Request at Appendix AA. The proposal does not represent an undesirable precedent, nor does it depart from the envisioned character of the area. The building does not in any instance exceed the tallest height control afforded to the site of 158m. The massing of the building responds to the surrounding context, broken down into a number of components that interface with the public domain in a sustainable way. A podium provided at the base of the building enables a suitable transition between the streetscape and the towers above. This is supported by considerable articulation and recessing reducing the dominance of the building.
PS-9	Inconsistent with surrounding character - The height, scale, and massing of the proposed development are considered out of character with the surrounding urban context. - The proposal is viewed as dominant on the skyline, particularly given its elevated position and the absence of nearby buildings of comparable height or bulk. - The scale of the development is seen as inconsistent with neighbouring low-rise and heritage buildings, particularly along Crown Street and surrounding streets that are predominantly two storeys in height.	8 submissions	Refer to response to Citi-3 .

Item	Summary of Matters Raised	Raised in	Responses
	- Concerns are raised that the development would create an oppressive streetscape and diminish the pedestrian experience, especially when approaching the city centre. - The placement of high-rise elements is viewed as disproportionate and visually intrusive when compared with retained low-rise heritage retail buildings nearby. - The variation in development intensity across the site is considered poorly resolved, with stark contrasts between tower elements and adjacent lower-scale areas. - The application of height or scale bonuses in this location is regarded as inappropriate and inconsistent with established height controls and prevailing built form. - Overall, the proposal is perceived as an unsympathetic design response that does not adequately respect Wollongong's established character, scale, or townscape qualities.		
PS-10	Overshadowing - Concern is raised that the height and massing of the proposed buildings will result in excessive overshadowing of surrounding areas. - The proposal is viewed as failing to adequately maximise solar access to both private spaces within the development and nearby residential properties. - Shadow impacts on Atchison Street are identified as particularly significant, with large portions of the street and adjacent residences overshadowed for extended periods during the day. - It is considered that overshadowing impacts on surrounding residential areas have not been sufficiently assessed, with the focus placed primarily on MacCabe Park. - Overshadowing of MacCabe Park is raised as a concern due to its role as an important public open space used by the community. - The loss of sunlight and reduced daylight access are seen as negatively affecting residential amenity, public space usability, and overall liveability.	5 submissions	Refer to the response to DPHI-1 and Citi-2 .

Item	Summary of Matters Raised	Raised in	Responses
	Suggestions are made that any reduction in sunlight to nearby public spaces should be offset through the provision of additional, high-quality, publicly accessible landscaped open space within the development.		
PS-11	Visual impact - The height, scale, and massing of the proposed development are considered visually dominant and out of character with the surrounding urban context. - The elevated location of the site is viewed as amplifying the visual impact, with the buildings expected to dominate the skyline and key approach views. - Concerns are raised that the proposal will significantly obstruct existing views, including ocean views and broader vistas enjoyed by nearby residential buildings. - The development is considered to have a major visual impact due to its scale across an entire city block, affecting multiple surrounding properties. - The variation in building heights and intensity across the site is viewed as poorly resolved, with stark contrasts between tower elements and adjacent lower-scale development. - The Visual Impact Assessment is considered limited in scope, with concerns that it assesses impacts from a single vantage point and does not adequately consider impacts on neighbouring high-rise residential buildings. - It is argued that visual impacts on lower-level dwellings and other nearby buildings have not been sufficiently assessed. - The proposal is perceived as resulting in unreasonable obstruction of valued and iconic views across Wollongong, particularly east-facing and ocean views.	7 submissions	The visual impact referred to, from no.3 Rawson Street, relates to an interrupted view of a panoramic ocean vista. For a large-scale development that is consistent with the increased density of zoning and height envelope, as instigated by Council, this view loss can be deemed acceptable, since views are effectively 'shared'. This is designated within The City of Wollongong DCP7 Part B – Land Use Based Controls Chapter B1: Residential Development 4.16 View Sharing 4.16.1 <i>Objectives (a) To encourage view sharing from adjoining or nearby properties, public places, and new development.</i> View sharing aims to ensure there is an equitable distribution of views between existing properties and future, compliant developments. It does not necessitate view retention of existing views. Despite the visual impact created by the new proposal, views are effectively shared. It should not be unreasonably expected of existing residents to be aware of the future potential scaling of under-developed sites within the vicinity of their properties.
Construction impacts			
PS-12	Hoarding implications Construction hoarding, demolition, excavation, and building works will cause significant congestion affecting pedestrian movement, traffic flow, and bus operations within the CBD, including potential disruption to existing bus stops and commuter access along Crown Street and Keira Street.	1 submission	Construction vehicles will not enter the site or stop via Crown Street throughout the entire construction period. Accordingly, the existing bus stop and waiting areas on Crown Street will not be impacted.

Item	Summary of Matters Raised	Raised in	Responses
PS-13	Potential construction traffic disruptions - Demolition, construction, and fit-out activities will generate significant heavy vehicle movements, resulting in congestion and disruption to CBD traffic and bus services. - Expected deliveries of scaffold, formwork, reinforcement, concrete agitators, and building services, are considered likely to cause ongoing traffic interruption. - Additional disruption is anticipated during the installation and removal of tower cranes, scaffolding, and related construction infrastructure.	1 submission	An updated CTMP prepared by Genesis is provided at Appendix M .
PS-14	Construction parking Detail the availability and management of parking for construction workers and trade personnel, including where vehicles will be parked and how workers will commute to and from the site during construction.	1 submission	An updated CTMP prepared by Genesis is provided at Appendix M .
PS-15	Potential construction noise, dust and vibration impacts - Concern is raised that demolition and excavation works, particularly hard-rock excavation using hydraulic jackhammers, will generate significant noise and vibration. - Construction noise and vibration are expected to be noticeable over a wide area and disruptive to nearby residents and businesses, based on experience from similar recent developments in the CBD. - Dust generation during excavation and construction is viewed as likely to impact residential amenity and air quality in surrounding areas. - The overall scale and intensity of the proposed development are considered likely to amplify construction impacts over an extended period. - There are calls for stringent, best-practice noise, dust, and vibration mitigation measures to be mandated as part of any approval. - Requests are made for restrictions on construction hours, particularly to minimise impacts on surrounding residents and daytime retail trade.	2 submissions	As discussed in the Acoustic Response to Submissions Letter at Appendix Y, similar not items discussed in Council-38 above, the NVIA includes Section 5 (<i>Construction Noise and Vibration Management Plan</i>), which includes as assessment of noise and vibration resulting from construction of the site including the period of excavation. Details of the project requirements, including those during the excavation period of the project include the similar comments including the Council-38 above.
PS-16	Potential construction risks and complications	3 submissions	The Applicant is committed to a strong development outcomes and to the delivery of the proposed development. Potential construction and

Item	Summary of Matters Raised	Raised in	Responses
	- Concern is raised that the scale and complexity of the project may place pressure on regional construction supply chains, including concrete supply, delivery capacity, labour, and trade availability. - Questions are raised about whether sufficient concrete supply and batching capacity exist within the region to accommodate multiple large concrete pours associated with the project. - The extended scale and duration of construction are viewed as potentially causing prolonged disruption to the Wollongong CBD, with cumulative impacts on businesses, residents, and overall city function. - There is concern that staged or prolonged construction could exacerbate disruption, particularly if unforeseen delays occur. - The possibility of contractor or developer insolvency during construction is raised as a risk, with reference to past cases where incomplete or defective developments have resulted in long-term site blight. - Nearby examples of major construction non-compliance are cited as raising broader concerns about quality assurance, regulatory oversight, developer accountability, and public safety for large-scale developments. - Overall, the proposal is considered to carry heightened construction and delivery risks that may have long-term consequences for the city if not tightly managed and regulated.		delivery challenges cannot be anticipated at this DA stage, particularly in relation to supply chains and program coordination. The Wollongong CBD area has an established capacity to support major development, with detailed procurement, staging and construction management measures to be resolved through standard post-approval processes and conditions of consent. The Applicant will manage the development through staged construction and future project management to facilitate the delivery of the development.
Commercial impacts			
PS-17	Construction impacts on businesses - Concern is raised that prolonged construction disruption and increased traffic congestion will deter residents and visitors from accessing the Wollongong CBD. - Reduced visitation during construction is viewed as likely to cause significant hardship for local businesses, potentially leading to business closures. - Ongoing disruption is considered likely to negatively affect attendance and economic activity at major CBD facilities and venues, including cultural, civic, and entertainment destinations.	1 submission	An updated CTMP prepared by Genesis is provided at Appendix M .

Item	Summary of Matters Raised	Raised in	Responses
	The cumulative effect of long-term construction impacts is seen as posing a risk to the vitality and economic resilience of the city centre.		
PS-18	Hotel use is inappropriate The proposed hotel use is unsuitable in its current context, with surrounding apartment towers, limited nearby attractions, struggling CBD businesses, and inadequate transport options making it unlikely to be attractive to visitors.	1 submission	The proposed hotel uses respond directly to Wollongong Council's suite of strategic documents that identify the need for additional short-term accommodation to support its visitor, tourism, and conference economies. Moreover, the hotel uses will foster additional operational jobs on the site and introduce a wider range and larger number of visitors to Wollongong to activate the area.
PS-19	Retail proximity to city centre - Concern is raised that the proposed retail frontages are unclear and are located too far from the established city-centre retail core. - The proposal is viewed as failing to reinforce retail continuity along Crown Street and Keira Street, weakening connections to the city centre. - Limited and poorly distributed retail is considered to contribute to inactive street frontages, particularly along key pedestrian routes. - The design is seen as overly inward-focused, funneling activity into the development rather than supporting surrounding streets and cross-block pedestrian movement. - Insufficient fully glazed shopfronts and frequent street entries are viewed as reducing street activation, passive surveillance, and pedestrian safety. - The proposal is considered unsympathetic to the existing retail character of surrounding streets, which generally feature continuous, street-oriented, glazed retail. - Overall, the development is viewed as failing to meaningfully support the vitality, safety, and continuity of the city-centre retail precinct.	2 submissions	The site is well located in an area of high amenity, adjacent to the existing commercial core of the CBD adjoining Wollongong Central shopping centre and fine grain retail uses along Crown Street. The proposal will support the continuation of this character, complementing existing uses by extending activated retail along the ground floor of the public domain. The through-site links intend to enhance pedestrian movement and will not detract from the current activity on the existing main streets.
Public transport			
PS-20	Lack of bus interchange Concern is raised that the proposal does not include a bus layover or interchange facility serviced from Burelli Street, Keira Street, and Crown	1 submission	Public domain changes and upgrades have been considered in tandem with TfNSW and Council to ensure a high-quality outcome. This has included significant consideration of the bus stop relocation and development of infrastructure in alignment with its function.

Item	Summary of Matters Raised	Raised in	Responses
	Street, which is seen as a missed opportunity to support public transport integration and CBD accessibility.		
PS-21	Incorporation of the existing bus stop - Concern is raised that the landscape and site plans do not clearly demonstrate how the existing bus stop on Crown Street, including seating and shelter, will be incorporated into the redevelopment. - Increased demand for public transport is anticipated due to the scale of the development, yet adequate space for waiting passengers and bus arrivals is not clearly shown. - Current bus stop facilities are already heavily used, with queues often exceeding available seating. - Existing building facades currently provide shelter, and it is unclear how equivalent or improved weather protection will be provided as part of the proposal.	1 submission	The location and configuration of the proposed bus stop on the Crown Street frontage have been coordinated with TfNSW as approved under DA-2021/957.
Traffic and parking			
PS-22	Traffic generation impacts - An increase in population will result in increases in traffic generation and congestion, worsening already poor perceived traffic conditions. - Additional vehicles brought to the area as a result of the proposal will increase safety risks for pedestrians, cyclists, and residents. - Inaccurate consideration of traffic generation including outdated information and a lack of consideration for future development proximate to the site.	5 submissions	The Traffic Impact Assessment (Appendix T of the EIS) has been prepared in accordance with the <i>TfNSW Guide to Traffic Generating Development</i> and the SEARs criteria. The TIA confirms that the minor differences in traffic generation are not considered to have a significant impact on the road network.
PS-23	Insufficient parking - The proposal provides insufficient parking for residents, visitors, and commercial tenants. - The existing parking infrastructure is insufficient and experiences congestion. - Concerns over supply of parking's ability to accommodate accessibility for aged, young families, disabled, visitors, shoppers, etc.	4 submissions	Refer to the response to DPHI-13 and DPHI-14 .

Item	Summary of Matters Raised	Raised in	Responses
PS-24	Demand on infrastructure Additional strain is placed on road and transport networks (private and public). Existing infrastructure will be unable to accommodate increases in population and usage.	1 submission	Refer to the response to PS-1 and PS-2 .
PS-25	Vehicle access arrangements and safety - Parking access arrangements are conducive to congestion and will not allow for efficient flow of traffic. - An increase of ingress/egress points are contributing to unsafe conditions due to poor visibility, the speed of existing traffic, on-street parking behaviour.	2 submissions	Refer to the response to DPHI-15 to DPHI-19 .
PS-26	Emergency vehicle arrangements The conditions of the existing surrounding street network, coupled with the future conditions as a result of the proposal, will mean that emergency vehicles (ambulances, fire trucks, police) may experience difficulties reaching the site in a timely manner.	2 submissions	Emergency vehicle access has been addressed in the Traffic Impact Assessment at Appendix T of the EIS. It outlines that, during construction emergency vehicles will be able to access the site by all construction access points. In relation to broader traffic outcomes, the report confirmed that the existing road network currently operates with spare capacity and satisfactory levels of service. The assessment also confirmed that, on a cumulative basis, the network can accommodate traffic from both the subject development and the neighbouring development with similarly satisfactory outcomes.
PS-27	Loading and delivery services Insufficient parking is provided for non-residential uses, including delivery services, which are required for the operation and function of the building and its residents.	1 submission	Refer to the response to DPHI-15 to DPHI-19 .
PS-28	Accessibility concerns Given the site's topography, access for people living with a disability is a challenge. How this is addressed is unclear.	1 submission	An Access Assessment Report has been prepared (Appendix KK of the EIS). Refer to the response to DPHI-25.
Building design			

Item	Summary of Matters Raised	Raised in	Responses
PS-29	Building aesthetic - The architectural form of the building, including the towers, are low-quality and not the most appropriate for the site. - An architectural design competition is proposed. - The built form's interface with surrounding buildings and open space is not well considered.	3 submissions	The design of the proposed development has been refined to respond to items raised through the response to submissions process, as detailed within this report. It is considered that the proposed building aesthetic, building interface, and proposed open space is of high quality and is the most appropriate for the site. For further detail see the Updated Architectural Drawings at Appendix E and Updated Urban Design Report at Appendix F.
PS-30	ESD Concerns over whether sustainable development elements been considered, especially given the influence the development has in the surrounding area as a result of its scale.	1 submission	The EIS is accompanied by an ESD report at Appendix Q. This sets out various ESD initiatives that are to be incorporated into the development and confirms that the proposed development would meet relevant energy and water reduction targets.
PS-31	Concern with inclusion of a supermarket Belief that the inclusion of a supermarket is not best suited for the site and alternative uses that will attract more people should be considered.	1 submission	Noted. The proposed development no longer includes a supermarket tenancy.
Housing diversity			
PS-32	Affordable housing comments - Queries regarding why affordable housing is delivered instead of social housing - The affordable housing component of the proposal should be located at a separate building within the site.	3 submissions	Affordable housing is defined within Section 1.4 of the EP&A Act as "housing for very low income households, low income households or moderate income households, being such households are described by regulations or as provided for in an environmental planning instrument". Given the proposal is providing affordable housing in accordance with Chapter 2 of the Housing SEPP, the definition of such households is provided in Section 13. The proposal provides a generous 132 affordable apartments. Spreading apartments throughout the development, rather than being contained within a single building, ensures that equitable environmental and residential amenity provisions are met when compared to that of market apartments.
Neighbouring property value			
PS-33	Concerns with impact on property values	2 submissions	The potential impact of a development on the value of neighbouring properties is not a matter for consideration under Section 4.15 of the

Item	Summary of Matters Raised	Raised in	Responses
	The proposal may affect property values in adjacent buildings, including as a result of view loss, overshadowing, and amenity.		Environmental Planning and Assessment Act 1979. Development applications are assessed having regard to planning merit, environmental impacts and the public interest.
Compliance with planning framework			
PS-34	Compliance with building height and floor space controls The proposed development exceeds the prescribed building height maximum of 48 meters under the Wollongong LEP.	1 submission	The height of building proposed is entirely compliant with the upper height limit on the site, with no exceedance proposed to the permissible maximum height of 158m. While this maximum height is greater than that prescribed by the LEP, the proposed development utilises height bonuses afforded by the Housing SEPP, which explicitly permit the height of a building to exceed LEP controls subject to a suitable provision of affordable housing. Extensive detail of the applicability of the Housing SEPP is provided in Section 7.1.1 and 7.1.3 of the EIS. Where an exceedance in height to a localised area of the site is exhibited (i.e. Building 2.2 where a maximum height of building of 78m applies), a Clause 4.6 Variation Request has been included (Appendix MM to the EIS). The proposed FSR of the development is also compliant with the Housing SEPP bonuses as discussed in Section 7.1.2 and 7.1.3 of the EIS. Notwithstanding, the proposal has been designed to respond to its unique site location and context within Wollongong City Centre through massing strategies that reduce environmental impacts such as overshadowing, privacy, and views. In doing so. The proposed heights, while disparate from the LEP, are permissible and do not result in adverse visual, environmental, or residential amenity impacts.
PS-35	Compliance under Sustainable Buildings SEPP The proposed development exceeds development standards and does not qualify as a prescribed large commercial development under the Sustainable Buildings SEPP.	1 submission	The proposed development has been considered under the Sustainable Buildings SEPP given it involves the erection of a new building with an estimated development cost of more than \$5 million. The proposed development also qualifies as large commercial development given the proposal includes hotel accommodation. Therefore, the proposal must be consistent with Section 3.3 and

Item	Summary of Matters Raised	Raised in	Responses
			Schedule 3 of the Sustainable Buildings SEPP to ensure that a minimum 4-star NABERS energy rating and 3-star NABERS water rating are achieved. As such, the proposal has been assessed with a sustainability lens and supported by an Ecologically Sustainable Development (ESD) Report at Appendix Q of the EIS.
PS-36	Compliance with zoning objectives The proposal does not align with the intended zoning objectives.	1 submission	The site is zoned E2 Commercial Centre. The proposed works are permissible in this zoning and are consistent with the objectives of the zone in that it will: - Facilitate the renewal of underutilised land in a highly accessible strategic location within the Wollongong City Centre. - Retain the site's existing heritage significance and incorporate the important heritage character within the redevelopment. - Provide high quality residential accommodation and a mix of housing choices to meet Wollongong's changing demographics and housing needs. - Contribute to the surrounding neighbourhood by delivering a high quality, contemporary, activated mixed-use precinct that supports housing, employment, retail and new footfall. - Significantly enhance the streetscape through improvements to the public realm including partially pedestrianising and activating the site's Burelli Street frontage, delivering an engaging new public plaza in the eastern part of the site with excellent solar access and a separate secondary through-site link connecting Burelli Street to Crown Street. - Ensure a high level of residential amenity by providing a large quantum of high quality residential communal open space and facilities throughout the development. - Provide a compatible and complimentary mix of commercial, retail and hotel floorspace on the site, at a scale that will be fully supported by the current and future residents and visitors to the

Item	Summary of Matters Raised	Raised in	Responses
			site, and which reinforces the retail primacy of Wollongong Town Centre. Integrate ecologically sustainable development (ESD) principles into the proposal's future design to achieve best practice sustainable building principles and improve the site's environmental and social performance.
PS-37	Compliance with local planning controls The status of the proposal as SSD overrides Wollongong's LEP and local strategic planning work, undermining public trust in the planning system.	1 submission	The proposed development has been declared State Significant Development pursuant to Division 4.7 – State Significant Development of the EP&A Act and Schedule 1 of the Planning Systems SEPP, given the predominant proposed purpose of the development is “In-fill affordable housing” with an estimated development cost of greater than \$30 million. Greater detail relating to the site's declaration as SSD is provided in Section 5.1 of the EIS. However, it should be noted that the proposal is not afforded alternative planning controls for the sole reason that the proposal has been declared SSD. Rather, additional building height and FSR have been afforded through the Housing SEPP, irrespective of the site's SSD declaration. Refer to the response to PS-34.
Community/public impacts			
PS-38	Flood impacts Flood risks to surrounding areas are present as a result of the site's topography.	1 submission	The site is not flood impacted. For further detail see the Flood Desktop Review Report provided at Appendix BB of the submitted EIS.
PS-39	Wind impacts - The height of the building will result in adverse wind impacts to both the street and the development itself. - The proposal will exacerbate existing wind conditions that are becoming apparent following the construction of multiple tall buildings in the Wollongong CBD.	3 submissions	Figures 18 to 21 of the report '30N-24-0405-TRP-101414-5-draft - Pedestrian Wind Comfort - Computational Wind Engineering' at Appendix O of the submitted EIS (and shown below) show that the wind conditions around the development are within the comfort and safety criteria. Note, that landscaping has not been included in the modelling and simulation. With the inclusion of the proposed landscaping, the wind conditions are expected to be further enhanced and well within the comfort and safety criterion.

Item	Summary of Matters Raised	Raised in	Responses
			Figure 18: Wind comfort result (combined all wind directions - Annual) - around the project site and walkways between the towers (Feb 2025).
PS-40	Urban heat effect - The proposal increases the urban heat island effect as a result of a disproportionate increase in hard, dark, impermeable surfaces. - The proposal is not accompanied by a commensurate amount of tree canopy cover.	2 submissions	The proposal provides an acceptable amount of permeable surfaces through public and private open space and deep soil areas. Tree canopy of the site is also proposed to support urban shading and the lowering of temperatures within the Wollongong CBD.
PS-41	Plant noise mitigation <i>All plant should be concealed behind noise cancelling barricades so as to eradicate their impact on streetlife at all times.</i>	1 submission	As discussed in the Acoustic Response to Submissions Letter at Appendix Y , the NVIA, submitted at Appendix II of the EIS, includes the assessment of potential noise emissions including the operation of building services. Section 4.2 of the NVIA includes the details of the assessment completed at the site, which includes the relevant project trigger noise levels which are detailed in Table 6 and is included below:

Item	Summary of Matters Raised	Raised in	Responses																																	
			4.2.2.2 Project Trigger Noise Levels The intrusive and amenity criteria for industrial noise emissions, derived from the measured data, are presented in Table 6. These criteria are nominated for the purpose of determining the operational noise limits for mechanical plant associated with the development which can potentially affect noise sensitive receivers. For each assessment period, the lower (i.e., the more stringent) of the amenity or intrusive criteria are adopted, which are shown in bold text in Table 6. Table 6 External noise level criteria in accordance with the NSW NPI <table><tr><th>Location</th><th>Time of Day ¹</th><th>Project Amenity Noise Level, LAeq, period ² (dBA)</th><th>Measured LAeq, 15 min (RBL) ³ (dBA)</th><th>Measured LAeq, period Noise Level (dBA)</th><th>Intrusive LAeq, 15 min Criterion for New Sources (dBA)</th><th>Amenity LAeq, 15 min Criterion for New Sources (dBA)</th></tr><tr><td rowspan="3">Residential Receivers</td><td>Day</td><td>55</td><td>47</td><td>59</td><td>52</td><td>58</td></tr><tr><td>Evening</td><td>45</td><td>43</td><td>57</td><td>48</td><td>48</td></tr><tr><td>Night</td><td>40</td><td>39</td><td>55</td><td>44</td><td>43</td></tr><tr><td>Commercial Receivers</td><td>When in use</td><td>60</td><td>-</td><td>-</td><td>-</td><td>63</td></tr></table> <i>Note 1 For Monday to Saturday, Daytime 7:00 am – 10:00 pm; Night-time 10:00 pm – 7:00 am. On Sundays and Public Holidays, Daytime 8:00 am – 10:00 pm; Night-time 10:00 pm – 8:00 am.</i> <i>Note 2 Project amenity noise level are shown as</i> <i>Note 3 LAeq Background Noise or Rating Background Level.</i> <i>Note 4 Project Noise Trigger Levels are shown in bold and underline.</i> <i>Note 5 Resulting amenity noise levels are calculated as per below in accordance with section 2.4.1 of the NSW EPA NPI.</i> Based on the expected Conditions of Consent all plant and equipment will be required to be designed such that compliance with the relevant project trigger noise levels are complied with. As part of the normal detailed design of the project plant and equipment selections will be undertaken, including details of noise levels, such that details of required acoustic mitigations can be recommended and included in the building services design. Details of the projects design, plant and equipment selections as well as required acoustic mitigation will be included as part of the CC design and certification. In addition to the design requirements the expected SSD conditions will include requirements for acoustic certification testing as part of the Occupation Certificates for the project. Details of compliance will be required to confirm that the completed project complies with the relevant project trigger noise levels. Construction traffic will be assessed and in accordance with the CTMP. The resulting traffic management plan would need to include the number of trucks expected during various stages of the project.	Location	Time of Day ¹	Project Amenity Noise Level, LAeq, period ² (dBA)	Measured LAeq, 15 min (RBL) ³ (dBA)	Measured LAeq, period Noise Level (dBA)	Intrusive LAeq, 15 min Criterion for New Sources (dBA)	Amenity LAeq, 15 min Criterion for New Sources (dBA)	Residential Receivers	Day	55	47	59	52	58	Evening	45	43	57	48	48	Night	40	39	55	44	43	Commercial Receivers	When in use	60	-	-	-	63
Location	Time of Day ¹	Project Amenity Noise Level, LAeq, period ² (dBA)	Measured LAeq, 15 min (RBL) ³ (dBA)	Measured LAeq, period Noise Level (dBA)	Intrusive LAeq, 15 min Criterion for New Sources (dBA)	Amenity LAeq, 15 min Criterion for New Sources (dBA)																														
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Commercial Receivers	When in use	60	-	-	-	63																														

Item	Summary of Matters Raised	Raised in	Responses
			Based on access to the site, construction traffic will predominantly utilise Mungerie Road which includes existing traffic. Based on the assessment included in the <i>SSDA Acoustic Assessment</i>, the expected traffic noise impacts from construction traffic will be within the requirements of the <i>NSW Road Noise Policy</i>.
Planning process			
PS-42	Setting a bad precedent The proposed development is likely to set an unhealthy precedent for height in the area and provides a base to allow future development to alter the planning context of the area.	2 submissions	The proposal is entirely consistent with the maximum height of building permitted on the site, with exceedances in height limits localised to lower density areas of the development. Therefore, the proposal is considered to align with the intent of development on the site and will not become a precedent for future exceedances.
PS-43	Concern around the proposal classifying as SSD The proposed development does not provide adequate affordable housing and should not qualify as a critical state project as such.	1 submission	Refer to the response to PS-37 .
Other technical matters			
PS-44	Inconsistency in landscape drawings The landscape plan LD-DA011 overall site plan does not match LD-DA010 tree management plan (trees along Crown Street).	1 submission	The Landscape Plans at Appendix H have been updated to ensure consistency with the Tree Management Plan.
PS-45	Concern with plant types Agapanthus are listed as a proposed species for the development. Given this plant is considered a weed, an alternative plant could be selected. Even if a sterile variety or new hybrid is used, it may be giving a mixed message to residents re appropriateness of these plants in gardens.	1 submission	The Landscape Plans (Appendix I of the EIS), include a planting schedule that has been developed to align with Council planting requirements and the broader character of the area. The planting of residents' plants falls outside of the remit of the Applicant.
PS-46	Electric charging infrastructure There appears to be an extensive area identified for bicycle parking however given the popularity of electric bikes, it would be reasonable to expect the provision of isolated charging areas that do not create a hazard to the rest of the development. Parking for electric cars and bikes does not appear to be	1 submission	Refer to the response to DPHI-14. Joeliane Electrical Engineer Consultants have prepared an Electrical Statement regarding the provision of EV at the site and confirm that the proposal includes the necessary infrastructure and allowances to support EV charging facilities within the designated parking areas. For

Item	Summary of Matters Raised	Raised in	Responses
	addressed or accommodated. Given the safety issues related to potential fire hazard of equipment.		further detail see the Electrical Statement – EV provision at Appendix HH .
PS-47	Lack of current analysis of existing travel behaviour In relation to existing travel behaviour, comparing 2016 and 2021 data is outdated and many more residential and commercial buildings have been erected.	1 submission	The Traffic Impact Assessment, appended to the EIS at Appendix T, has been prepared in accordance with State guidelines and requirements and therefore provides an accurate assessment of travel behaviours.
PS-48	Address Council's Neighbourhood Forum The Council's Neighbourhood Forum 5 Sep 2021 outlines significant implications for the structure of the city centre. This proposal does not appear to have addressed the 7 structural implications for the City Centre raised in that meeting.	1 submission	The design of the proposed development has significantly progressed over the past 5 years since September 2021, and the proposed development has responded to specific Council raised concerns through the response to submissions process. For details of the response to Council comments see Table 3 above.