



Response to Submissions Report

Mixed-use Development and Infill Affordable Housing

Crown Street, Wollongong

Submitted to Department of Planning, Housing and Infrastructure
on behalf of Wollongong Developments No.8 Pty Ltd

Prepared by Colliers Urban Planning

3 July 2026 | 2240280



'Gura Bulga'

Liz Belanjee Cameron

'Gura Bulga' – translates to Warm Green Country. Representing New South Wales.



'Dagura Buumarri'

Liz Belanjee Cameron

'Dagura Buumarri' – translates to Cold Brown Country. Representing Victoria.



'Gadalung Djarri'

Liz Belanjee Cameron

'Gadalung Djarri' – translates to Hot Red Country. Representing Queensland.

Colliers Urban Planning acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We pay our respects to their Elders past and present.

In supporting the Uluru Statement from the Heart, we walk with Aboriginal and Torres Strait Islander people in a movement of the Australian people for a better future.

Contact		Ben Craig Director, Planning	ben.craig@colliers.com
This document has been prepared by		This document has been reviewed by	
Ella Freire-Yale	3 July 2026	Anthony Brogan / Ben Craig	3 July 2026
Version No.	Date of issue	Prepared by	Approved by
A (DRAFT)	01/07/2026	EFY	AB / BC
B (FINAL)	03/07/2026	EFY	AB / BC

Reproduction of this document or any part thereof is not permitted without written permission of Colliers International Urban Planning Pty Ltd. Colliers Urban Planning operates under a Quality Management System. This report has been prepared and reviewed in accordance with that system. If the report is not signed, it is a preliminary draft.



Colliers International Urban Planning Pty Ltd | ABN 13 615 087 931 | Sydney NSW | Melbourne VIC | Brisbane QLD | colliers.com

Contents

Executive Summary	7
1.0 Introduction	9
1.1 Exhibited Development	9
1.2 Site Overview	10
1.3 Project Objectives.....	12
2.0 Analysis of Submissions	13
2.1 Breakdown of Submissions.....	13
2.2 Categorising of Issues.....	13
3.0 Actions Undertaken Since Exhibition.....	16
3.1 Further Engagement Undertaken	16
3.2 Refinements to the Proposed Development	16
3.3 Further Assessment Undertaken	28
4.0 Response to Submissions	33
5.0 Updated Project Summary.....	34
6.0 Updated Mitigation Measures.....	35
7.0 Updated Project Justification	36
7.1 Project Design.....	36
7.2 Strategic Context	36
7.3 Statutory Context	36
7.4 Community Views.....	36
7.5 Likely Impacts of the Development.....	36
7.6 Suitability of the Site	37
7.7 Public Interest.....	38
8.0 Conclusion.....	39

Figures

Figure 1	Render of the exhibited proposal	10
Figure 2	Site aerial.....	11
Figure 3	Location of reduced building massing.....	17
Figure 4	Comparison between SSDA (as exhibited) and proposed Building 1 massing from North Elevation	17
Figure 5	Comparison between SSDA (as exhibited) previous and proposed Building 2.3 massing from the south elevation	18
Figure 6	Comparison between SSDA (as exhibited) and proposed Hotel Building massing from south and west elevations	19
Figure 7	Comparison between SSDA (as exhibited) and proposed building separation between Building 2.1 and 2.2 above Level 3	20
Figure 8	Privacy measures introduced between Building 2.1 and Building 2.2	21
Figure 9	Comparison between SSDA (as exhibited) and proposed Marcus Clark Building activation at Lower Ground Level	22
Figure 10	Comparison between SSDA (as exhibited) and proposed Marcus Clark Building activation at Ground Level.....	23
Figure 11	Comparison between SSDA (as exhibited) and proposed Marcus Clark Building activation at Level 1	23
Figure 12	Comparison between SSDA (as exhibited) and proposed Burelli Street activation and landscaping	23
Figure 13	Comparison between SSDA (as exhibited) and proposed east-west through-site link at Lower Ground Level...	24
Figure 14	Comparison between SSDA and proposed corner of Atchison Street and Burelli Street	25
Figure 15	Comparison between SSDA and proposed Crown Street bus zone	25
Figure 16	Comparison between SSDA and proposed Crown Street kerb alignment.....	26
Figure 17	Comparison between SSDA and proposed staging	26
Figure 18	Additional viewpoint from 15 Railway Parade.....	30
Figure 19	Additional viewpoint from 3 Rawson Street	30
Figure 20	Additional viewpoint from 12 Regent Street.....	30
Figure 21	Additional viewpoint from 10 Thomas Street.....	30
Figure 22	Comparison between SSDA and proposed overshadowing of MacCabe Park at 2pm mid-winter	31

Tables

Table 1	Site Description	10
Table 2	Summary of Submissions Received	13
Table 3	Summary of Issues Raised	13
Table 4	Summary of Further Engagement Undertaken	16
Table 5	Adjustments to the Proposed GFA.....	19
Table 6	Adjustments to the Residential Mix	20
Table 7	Further Assessments Undertaken.....	28

Appendices

Appendix	Author
A. Submissions Register	Colliers Urban Planning
B. Updated Mitigation Measures	Colliers Urban Planning
C. Updated Statutory Compliance Table	Colliers Urban Planning
D. Detailed Response to Submissions	Colliers Urban Planning
E. Updated Architectural Drawings	DKO Architects
F. Updated Design Report	DKO Architects
G. Updated Estimated Development Cost Report	Archi-QS
H. Updated Landscape Plan	Land and Form
I. Architectural Design Response	DKO Architects
J. Noise and Vibration Impact Assessment	PWNA
K. Updated Connecting with Country Report	Artefact
L. Updated Crime Prevention Through Environmental Design Report	Lote Consulting
M. Updated Traffic Impact Assessment	Genesis Traffic
N. Updated Aboriginal Cultural Heritage Assessment Report	Artefact
O. Updated Archaeological Technical Report	Artefact
P. Updated Historical Archaeological Assessment	Austral Archaeology
Q. Updated Statement of Heritage Impact	Weir Phillips Heritage
R. Updated Arboricultural Impact Assessment Report	Seasoned Tree Consulting
S. Tree Management Plan	Seasoned Tree Consulting
T. Geotechnical Investigation	Foundation Earth Sciences
U. Hydrogeological Investigation	Foundation Earth Sciences
V. Updated Public Domain Plans	SGC
W. Updated Operational Waste Management Plan	Elephants Foot Consulting
X. Updated Infrastructure Delivery, Management and Staging Plan	Neuron
Y. Acoustic Response Letter	Pulse White Noise Acoustics
Z. Updated Access Assessment Report	East Coast Accessibility
AA. Updated Clause 4.6 Variation Request (Building Height)	Colliers Urban Planning
BB. Updated Clause 4.6 Variation Request (Building Separation)	Colliers Urban Planning
CC. Updated Stratum Layout	Masters Surveying
DD. Updated Visual Impact Assessment	Urbaine
EE. Preliminary Public Art Plan	8th Wonder
FF. Housing Trust Letter of Support	Housing Trust
GG. Agent Letter of Support	Colliers
HH. Electrical Statement – EV Provision	Joeliane Electrical Engineer
II. GoGet Letter of Support	GoGet

JJ. Structural Statement	Mance Arraj Engineers
KK. Waste Letter – Staging	Elephants Foot Consulting
LL. Civil Engineering Response Letter	SGC
MM. Updated FSR Calculation	Colliers Urban Planning

Executive Summary

Purpose of this Report

This Submissions Report has been prepared by Colliers Urban Planning on behalf of Wollongong Developments No.8 Pty Ltd (the Applicant) to address the matters raised during the Public Exhibition of *Crown Square - Mixed use development with infill affordable housing - Crown Street, Wollongong* (SSD-76440958) at 221-291 Crown Street, 216-238 Keira Street and 86-90 Burelli Street, Wollongong (the site).

The State Significant Development Application (SSDA) was publicly exhibited from Friday 24 October 2025 until Thursday 6 November 2025, with a Request for Information (RFI) letter issued on Thursday 12 February 2026. The SSDA, as exhibited, sought approval for the design, construction and operation of the proposed mixed use shop top housing, hotel and commercial development.

Overview of Submissions

In relation to the Public Exhibition of the SSDA, a total of 36 submissions were received. These included submissions made by relevant government agencies and organisations, as well as members of the public.

Specifically, submissions were received from the following:

- Department of Planning, Housing and Infrastructure (DPHI);
- State Design Review Panel (SDRP);
- Wollongong City Council (Council / WCC);
- Transport for NSW (TfNSW);
- Conservation Programs, Heritage and Regulation Group (CPHR);
- Heritage NSW (HNSW);
- NSW State Emergency Service (SES);
- Citi 1 Owner's Committee;
- Endeavour Energy; and
- Members of the public.

The submissions related to a range of issues that included:

- Building height and separation;
- Architectural and urban design;
- Traffic, parking and access;
- Loading, servicing and waste management;
- Noise impacts;
- Local character;
- Land use;
- Public domain and landscaping;
- Safety and wayfinding;
- Planning compliance;
- Community consultation;
- Housing;
- Environmental impacts;
- Community amenity;
- Heritage impacts; and
- Construction impacts.

Actions Taken Since Exhibition

Following the Public Exhibition of the SSDA, the Applicant has undertaken further engagement with the key relevant authorities being DPPI, Wollongong City Council and TfNSW. Discussions with the relevant authorities have included presentation of the proposed design responses to the commentary received during exhibition. This is detailed further in **Section 3.1**.

A number of key design refinements and amendments have been made in response to the submissions received. Importantly, these refinements remain broadly consistent with the project description within the exhibited SSDA and do not raise any additional material environmental impacts. However, the design refinements proposed within the RtS within require minor amendments to what the application is seeking consent for, and therefore an amendment to the proposed development description is detailed at **Section 5.0**.

Response to Submissions

In response to the submissions received, several refinements have been made to the proposed scheme, including:

- Built form, layout and height;
- Architectural design;
- Floorspace, mix and yield;
- Visual privacy;
- Activation and pedestrian permeability;
- Public domain works;
- Staging; and
- Other design refinements.

Updated Project Justification

The design refinements proposed as part of the Response to Submissions include further mitigation measures to address potential impacts of the development. Overall, the impacts are considered to be acceptable and are fully capable of being managed as outlined within updated mitigation measures at **Section 6.0**. An update to the project justification is detailed with **Section 7.0**.

1.0 Introduction

This Response to Submissions (RTS) Report has been prepared by Colliers Urban Planning on behalf of Wollongong Developments No.8 Pty Ltd (the Applicant) to address the matters raised during the Public Exhibition of *Crown Square - Mixed use development with infill affordable housing - Crown Street, Wollongong* (SSD-76440958) at 221-291 Crown Street, 216-238 Keira Street and 86-90 Burelli Street, Wollongong (the site).

The SSDA was publicly exhibited from Friday 24 October 2025 until Thursday 6 November 2025. During exhibition, 36 submissions were received, comprising of support, comment and objections, from relevant government agencies, organisations, and from members of the public. A Request for Information (RFI) letter was received from DPHI on Thursday 12 February 2026.

This Submissions Report provides an analysis of submissions, actions taken since Public Exhibition, the Applicant's response to submissions, and provides an updated justification of the proposed development. It is accompanied by supporting information and technical reports (refer to **Table of Contents**).

This Submissions Report, as required under section 59(2) of the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation), has been prepared in accordance with the DPHI's *State Significant Development Guidelines, including Appendix C – Preparing a Submissions Report*.

1.1 Exhibited Development

The SSDA modification, as exhibited, sought approval for the design, construction and operation of the proposed mixed use shop top housing, hotel and commercial development.

Specifically, the exhibited development sought consent for:

- Demolition of existing structures on the site, retention of heritage facades, tree removal and site excavation for new basement.
- Construction of a new mixed-use development consisting of:
 - Four residential towers, ranging from 16 to 38 storeys and comprising 546 apartments including:
 - 414 market apartments.
 - 132 affordable apartments.
 - Residential lobbies and podium.
 - Communal open space.
 - A 10-storey commercial office building, an 8-storey hotel comprising 166 rooms, and numerous retail tenancies (including a supermarket) consisting of:
 - 10,009 sqm of commercial GFA.
 - 8,793 sqm of hotel GFA.
 - 3,781 sqm of retail GFA.
 - 1,510 sqm of retail supermarket GFA.
- Car, motorcycle and bicycle parking for residents, workers and visitors across two basement levels, mezzanine, lower ground and levels 1 and 2 including:
 - 774 car parking spaces, including:
 - 547 residential spaces (including accessible spaces).
 - 49 residential visitor spaces.
 - 63 commercial/retail/residential visitor spaces.
 - 25 commercial/retail (staff) spaces.
 - 10 hotel (staff only) spaces.
 - 80 retail (supermarket) spaces.
 - Five (5) loading bays.
 - 320 bicycle parking spaces.

- 47 motorcycle parking spaces.
- New public open space including a new public plaza.
- Associated landscaping and public domain works.

Figure 1 below illustrates the Proposal as exhibited.



Figure 1 *Render of the exhibited proposal*

Source: DKO Architects

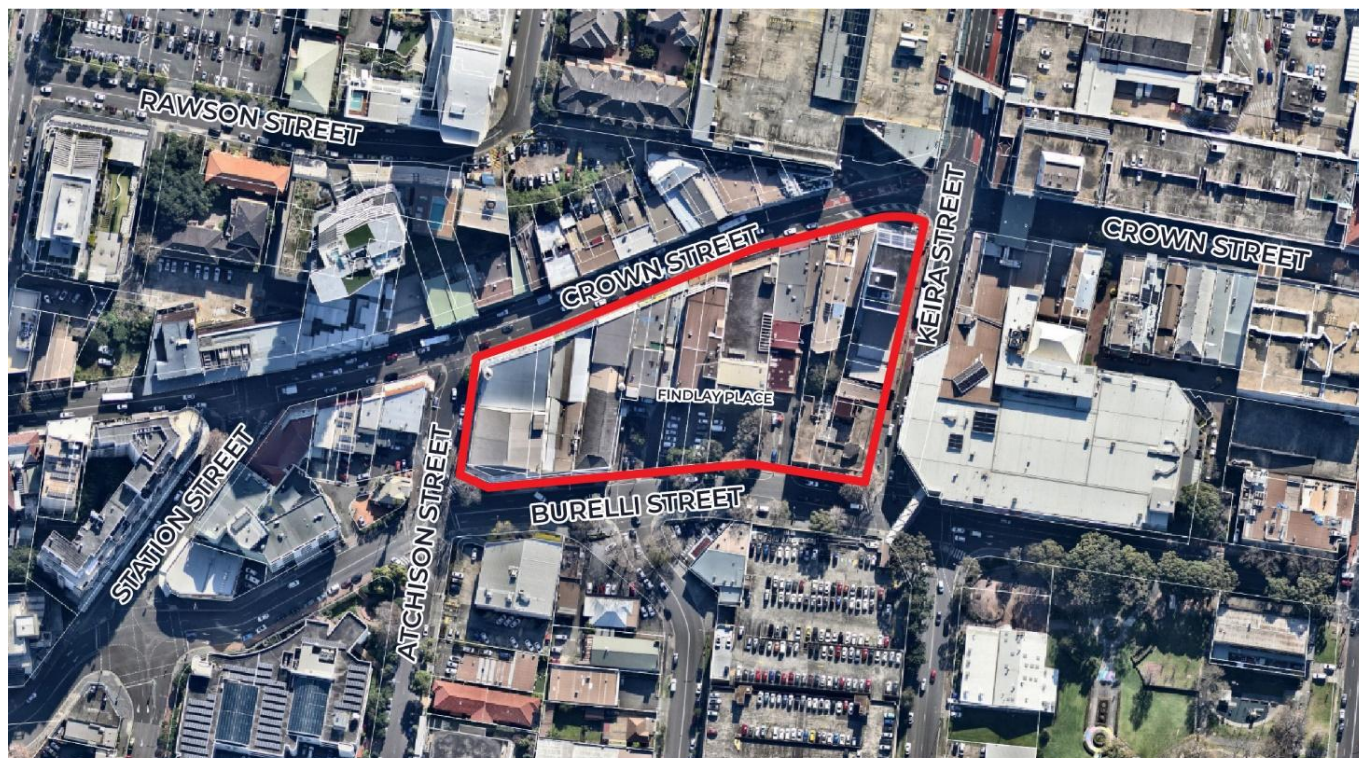
1.2 Site Overview

The site is located at 221-291 Crown Street, 216-238 Keira Street and 86-90 Burelli Street, Wollongong, within the Wollongong Local Government Area (LGA). The site is well located, being approximately 280m from Wollongong Train Station which provides services within Wollongong and to the Sydney CBD. It is adjacent to Wollongong Central shopping centre, which a major regional employment and retail hub, and has ready access to public open space with McCabe Park being less than 50m away. The site contains several existing 2-3 storey buildings of a mix of uses. The site is an irregular rectangular shape with an area of approximately 13,088m² and comprises 27 allotments identified in **Table 1** below. All lots are owned by Wollongong Developments No.8 Pty Ltd. A site aerial is provided in **Figure 2** below.

Table 1 *Site Description*

Lot Description	Street Address
Lot 1 in DP 112417	216-222 Keira Street
Lot 100 in DP 774957	226-230 Keira Street
Lot 9 in DP 551157	232-234 Keira Street
Lot 8 in DP 546125	236-238 Keira Street
Lot 1 in DP 88455	86 Burelli Street
Lot 4 in DP 17979	
Lot 5 in DP 17979	

Lot B in DP 395330	90 Burelli Street
Lot 1 in DP 220513	221-229 Crown Street
Lot 3 in DP 17979	231 Crown Street
Lot 2 in DP 17979	233-235 Crown Street
Lot 1 in DP 17979	237-241 Crown Street
Lot 7 in DP 878243	243-251 Crown Street
Lot 1 in DP 1135333	253-259 Crown Street
Lot 1 in DP 226374	261 Crown Street
Lot 1 in DP 183348	269-271 Crown Street
Lot 2 in DP 226374	273-279 Crown Street
Lot 3 in DP 319452	281-291 Crown Street
Lot 2 in DP 319452	281-291 Burelli Street
Lot 1 in DP 319452	
Lot 2 in DP 181570	
Lot 1 in DP 1116034	
Lot 1 in DP 82673	
Lot 1 in DP 117019	
Lot 1 in DP 927806	
Lot 1 in DP 1198873	
Lot 1 in DP 1087986	



The Site

 NOT TO SCALE

Figure 2 *Site aerial*

Source: Nearmap, edits by Colliers Urban Planning

1.3 Project Objectives

The proposal seeks to improve the provision of diverse housing options through a new mixed-use precinct within the Wollongong LGA, responding to the site's unique context and aligning with broader local and state government planning directives. The objectives of the proposed development are to:

- 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 complementary mix of commercial, retail and hotel floorspace on the wider site, at a scale that will be fully supported by the current and future residents and visitors to the site, and which reinforces the retail and commercial primacy of Wollongong Town Centre.
- Integrate environmental 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.

2.0 Analysis of Submissions

This section analyses the submissions received by providing a breakdown of the type of submissions received and identifying the issues raised.

2.1 Breakdown of Submissions

In relation to the Public Exhibition of the SSDA, a total of 36 submissions were received which included submissions made by relevant government agencies, organisations, and members from the public. A breakdown of the submissions received is provided in **Table 2** below.

Table 2 Summary of Submissions Received

Submissions Received	Position
Government Authorities and Agencies	
Department of Planning, Housing and Infrastructure	Comments for consideration.
State Design Review Panel	Comments for consideration.
Wollongong City Council	Comments for consideration.
Transport for NSW	Comments for consideration.
Conservation Programs, Heritage and Regulation	Comments for consideration.
Heritage NSW	Comments for consideration.
NSW State Emergency Service	Comments for consideration.
Public Submissions: Organisations	
Citi 1 Owner's Committee	Comments for consideration.
Endeavour Energy	Comments for consideration.
Public Submissions: Individuals	
Comment	5
Support	1
Object	21

2.2 Categorising of Issues

A categorical summary of the issues raised during the submissions period is provided below in **Table 3**.

Table 3 Summary of Issues Raised

SSD Guidelines Category	Matter Raised	Overview	Raised by				
			DPHI	SDRP	Council	Agencies	Public
The project (e.g. the site, the project area, the physical layout and design, key uses and activities, timing)	Building Height and Separation	Concerns regarding overshadowing to surrounding properties and public domain.	●	●	●		●
		Concerns regarding the loss of existing views.	●		●		●
		Concerns with proposed height and impact to amenity of site's surrounds.	●		●		●
		Request for building separation to be enhanced and mitigation measures be	●	●	●		

SSD Guidelines Category	Matter Raised	Overview	Raised by				
			DPHI	SDRP	Council	Agencies	Public
		implemented to address privacy impacts.					
	Traffic, Parking and Access	Concerns regarding number of car parking spaces proposed.	●	●	●		●
		Concerns with service vehicle access and movements.	●		●	●	●
		Request for bicycle parking to be adjacent to the end-of-trip facilities as well as mitigation measures to address the safe movement of cyclists.	●		●		
		Concerns regarding traffic generation on local infrastructure network.			●		●
	Waste Management	Request for clarification and improvements to waste management components.	●		●		
	Noise Impacts	Request for further justification of acoustic comfort for dwellings and the implementation of any necessary mitigation measures.	●		●		●
	Local Character	Concerns that the building's scale is inconsistent with surrounding low-rise character.					●
	Land Use	Request for further justification of the land use's contribution to the vitality of the CBD.			●		●
	Public Domain and Landscaping	Request for consideration of public domain improvements.	●	●	●	●	●
		Concerns regarding the level of accessibility of the public spaces.	●	●		●	
		Request for consideration to enhance street activation.	●	●	●		
		Concerns with the level of tree canopy and the protection of retained street trees.	●	●	●		●
	Safety and Wayfinding	Concerns with the level of safety and security of the proposed streetscape.		●	●		●
		Request for the proposed development to provide legible and accessible building entries.	●	●	●		●

SSD Guidelines Category	Matter Raised	Overview	Raised by				
			DPHI	SDRP	Council	Agencies	Public
Procedural matters (e.g. level or quality of engagement, compliance with the SEARs, identification of relevant statutory requirements)	Planning Compliance	Request for further justification of proposed development in accordance with applicable ADG, SEPP, LEP and DCP provisions.	●		●	●	●
	Community Consultation	Concerns with level of community engagement.					●
Economic, environmental and social impacts of the project (e.g. amenity, air, biodiversity, heritage)	Housing	Concerns with the provision and distribution of affordable housing.					●
		Concerns with the potential impact on property values					●
	Environmental Impacts	Concerns with potential biodiversity implications of proposed development.				●	
		Concerns with potential flood implications of proposed development.				●	●
		Concerns with potential wind implications of proposed development.					●
		Concerns with internal air quality and requests consideration of the full-electrification of the proposed development.		●	●		
	Community Amenity	Concerns with the removal of approved community amenities and infrastructure.					●
	Heritage Impacts	Concerns regarding the impact on heritage significance and alignment in relation to surrounding heritage items.			●		●
	Construction Impacts	Concerns regarding impact of construction works to local area.			●		●

3.0 Actions Undertaken Since Exhibition

This section summarises the further engagement undertaken by the Applicant, describes any refinements or amendments to the Proposal and further impact assessment undertaken.

3.1 Further Engagement Undertaken

Following the Public Exhibition of the SSDA, the Applicant has undertaken further engagement with the key relevant authorities, as described in **Table 4** below.

Table 4 Summary of Further Engagement Undertaken

Stakeholder	Engagement Undertaken
Department of Planning, Housing and Infrastructure	- A meeting was held on 10 March 2026 between the proponent team and DPHI to present the Applicant's design response to DPHI's submission. - Following this meeting, DPHI provided feedback on the design response via email dated 18 March 2026. - As part of its feedback, DPHI recommended further consultation with Council and TfNSW to discuss comments relating to the public domain and traffic matters. - A further meeting was held with DPHI on 28 May 2026 to present detailed design progression of the amended scheme and intended responses to the key issues raised.
Wollongong City Council	A meeting was held on 9 April 2026 between the proponent team and representatives from Council and TfNSW to present the Applicant's design response addressing public domain and traffic considerations raised within the submissions received.
Transport for NSW	Following this meeting, the Applicant's preliminary RTS response on the proposed public domain works and traffic considerations was issued following to TfNSW and Council for review and feedback, with the only outstanding matter relating to adequate clearances and potential operational conflicts. Refer to the response to TfNSW in Appendix D.

3.2 Refinements to the Proposed Development

A number of key design refinements and amendments have been made in response to the submissions received. Importantly, these refinements remain broadly consistent with the project description within the exhibited SSDA and do not raise any additional material environmental impacts. However, the design refinements proposed within the RtS require minor amendments to what the application is seeking consent for, and therefore an amendment to the proposed development description is detailed at **Section 5.0**. A summary of the key amendments from the exhibited scheme and the revised RTS scheme is provided in the sections below.

3.2.1 Built Form and Height

In response to feedback received from DPHI, Citi 1 Owner's Committee and members of the public, the proposed development has been refined to increase the setback at the upper levels of Building 1, Building 2.3 and the Hotel Building to maximise solar access to MacCabe Park, as shown in **Figure 3** and detailed in the sections below.

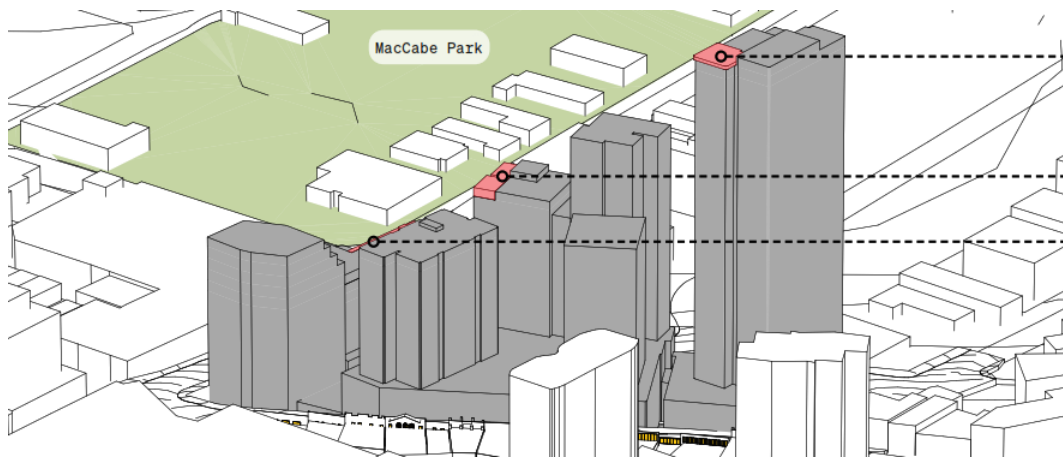


Figure 3 Location of reduced building massing

Source: DKO Architects

Building 1 Massing

The mass of Building 1 has been reduced, as shown in **Figure 4**. This reduces impacts to environmental amenity by providing a suitable height transition to reduce overshadowing impacts to MacCabe Park. Notable design changes which have reduced the mass of the building includes:

- This setback portion of the upper level enables the building to step down to the east resulting in an improved transition in building height.
- The GFA of Building 1 has been reduced by 1,045m².

Updated Architectural Drawings have been prepared by DKO Architects and are provided at **Appendix E**. The revisions made to Building 1 are further discussed in the Design RtS Response at **Appendix MM**.



Original Proposal

Revised Proposal

Figure 4 Comparison between SSDA (as exhibited) and proposed Building 1 massing from North Elevation

Source: DKO Architects

Building 2.3 Massing

The mass of Building 2.3 has also been reduced, as shown in **Figure 5**. This reduces impacts to environmental amenity by providing a suitable height transition to reduce overshadowing impacts to MacCabe Park. The design changes include:

- A reduction in building height from 17 storeys to 16 storeys, to the eastern portion side of building. This helps reduce the exceeding height, as discussed in the revised Clause 4.6 Variation Request at **Appendix AA**.
- This setback portion of the upper level enables the building to step down to the east resulting in an improved transition in building height.

- The GFA of Building 2 has been reduced by 666m², and the dwelling yield in this building has been reduced by three (3) apartments.

Updated Architectural Drawings have been prepared by DKO Architects and are provided at **Appendix E**. The revisions made to Building 2 are further discussed in the Design RtS Response at **Appendix MM**.



Figure 5 Comparison between SSDA (as exhibited) previous and proposed Building 2.3 massing from the south elevation

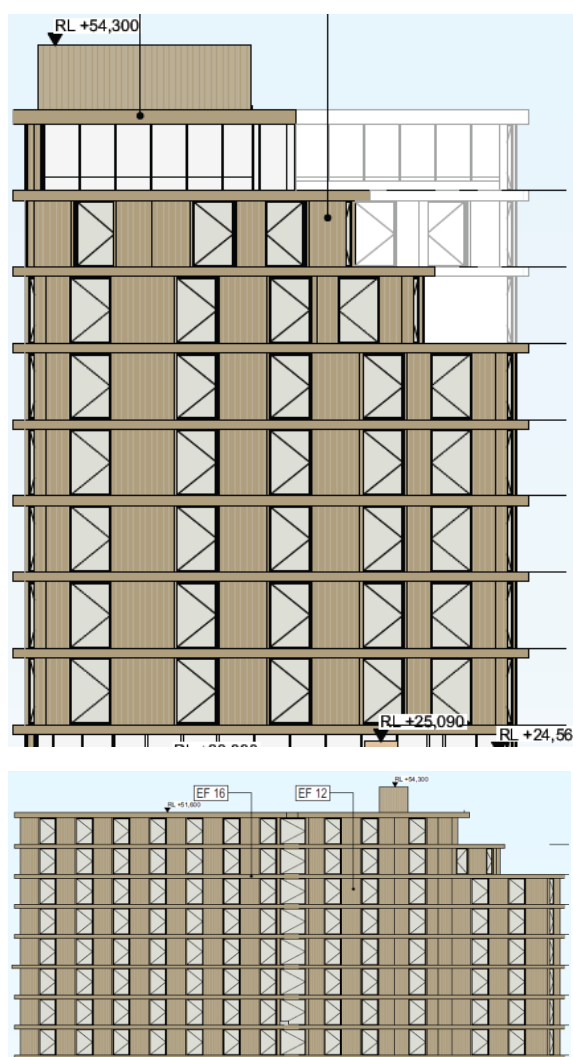
Source: DKO Architects

Hotel Building Massing

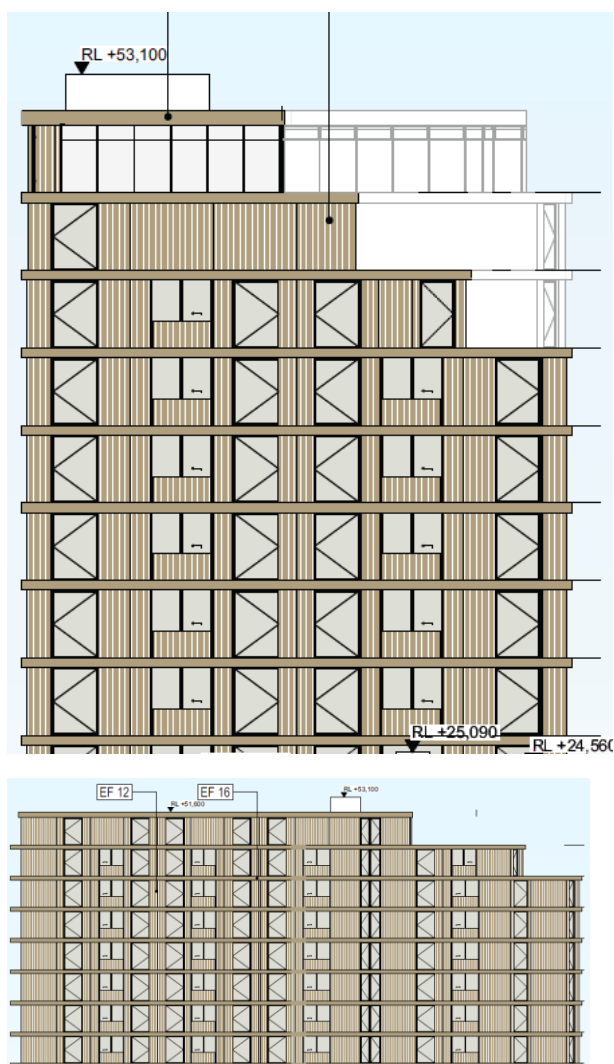
The mass of the Hotel Building has been reduced, as shown in **Figure 6**. This reduces impacts to environmental amenity by providing a suitable height transition to reduce overshadowing impacts to MacCabe Park. Notable design changes which have reduced the mass of the building include:

- Increased upper-level setbacks that enable the building to step down to the east resulting in an improved transition in building height.
- A reduction in the GFA of the Hotel Building by 1,360m², and a corresponding reduction of the size of the hotel to 80 rooms.

Updated Architectural Drawings have been prepared by DKO Architects and are provided at **Appendix E**. The revisions made to the Hotel Building are further discussed in the Design RtS Response at **Appendix MM**.



Original Proposal



Revised Proposal

Figure 6 Comparison between SSDA (as exhibited) and proposed Hotel Building massing from south and west elevations

Source: DKO Architects

3.2.2 Floorspace, Mix and Yield

The revised massing results in changes to the proposed quantum of floorspace to affected buildings, as well as the proposed removal of the supermarket tenancy from Building 1, the increased GFA on the typical layout in Building 1 and the increased provision of retail premises in the Commercial Building. This is summarised in **Table 5** below. Where revised, the change from the previous corresponding proposed floor space is shown in **bold** in brackets. The updated development scheme has a revised gross floor area (GFA) of 76,845m² or 5.87:1 FSR, representing a minor GFA increase of 143m² compared to the originally proposed 76,899m² or 5.87:1 FSR. This remains entirely compliant with the maximum floor space ratio of 5.9:1.

Pursuant to the Housing SEPP, 10% of the proposed GFA is to be provided as affordable housing. The total affordable housing floorspace proposed is 11,620m², which equates to 15% of 76,845m².

Table 5 Adjustments to the Proposed GFA

GFA	Building 1	Building 2	Building 3	Commercial Building	Hotel
Residential	23,822m ² (+304m²)	20,568m ² (-267m²)	8,423m ² (-20m²)	-	-
Non-Residential	3,494m ² (+741m²)	2,763m ² (-399m²)	-	10,333m ² (+2,262m²)	7,443m ² (-1,360m²)

GFA	Building 1	Building 2	Building 3	Commercial Building	Hotel
Total	27,316m ² (+1,045m ²)	23,331m ² (-666m ²)	8,423m ² (-20m ²)	10,333m ² (+2,262m ²)	7,433m ² (-1,360m ²)

Amendments to built form have similarly resulted in a reduced provision of six (6) market units from Building 2 and Building 3. This is summarised in **Table 6** below. No change is proposed to the provision of affordable housing.

Table 6 Adjustments to the Residential Mix

Apartment Type	Original Proposal	Revised Proposal	Change
Market Apartments	1 Bed: 106 2 Bed: 218 3 Bed: 87 4 Bed: 3 Total: 414	1 Bed: 100 2 Bed: 214 3 Bed: 94 Total: 408	1 Bed: -6 2 Bed: -4 3 Bed: +7 4 Bed: -3 Total: -6
Affordable Housing	1 Bed: 57 2 Bed: 72 3 Bed: 3 Total: 132	1 Bed: 57 2 Bed: 72 3 Bed: 3 Total: 132	No change
Total	546	540	Reduced by 6 units

3.2.3 Visual Privacy

In response to feedback received from DPHI, SDRP and Council, the proposed development has been refined to enhance the visual privacy of apartments by limiting opportunities for overlooking between Building 2.1 and Building 2.2, as detailed in the sections below.

Increased Building Separation

The revised orientation of Building 2.1 has repositioned habitable room windows away from Building 2.2, which addresses potential visual privacy impacts by reducing opportunities for direct overlooking between the two buildings.

The reduction in the setback to Crown Street from 6m to 3m has also facilitated a corresponding increase in the separation distance between Building 2.1 and Building 2.2. As a result, the distance between the buildings has increased from 8.9m to 12m along the western interface and from 11.3m to 15.1m along the eastern interface as shown in **Figure 7** below and as discussed in the revised Clause 4.6 Variation Request at **Appendix BB**. These increased separation distances further mitigate potential overlooking impacts, improve access to daylight and outlook, and contribute to a more generous spatial relationship between the buildings, resulting in enhanced residential amenity and a higher-quality built form outcome.

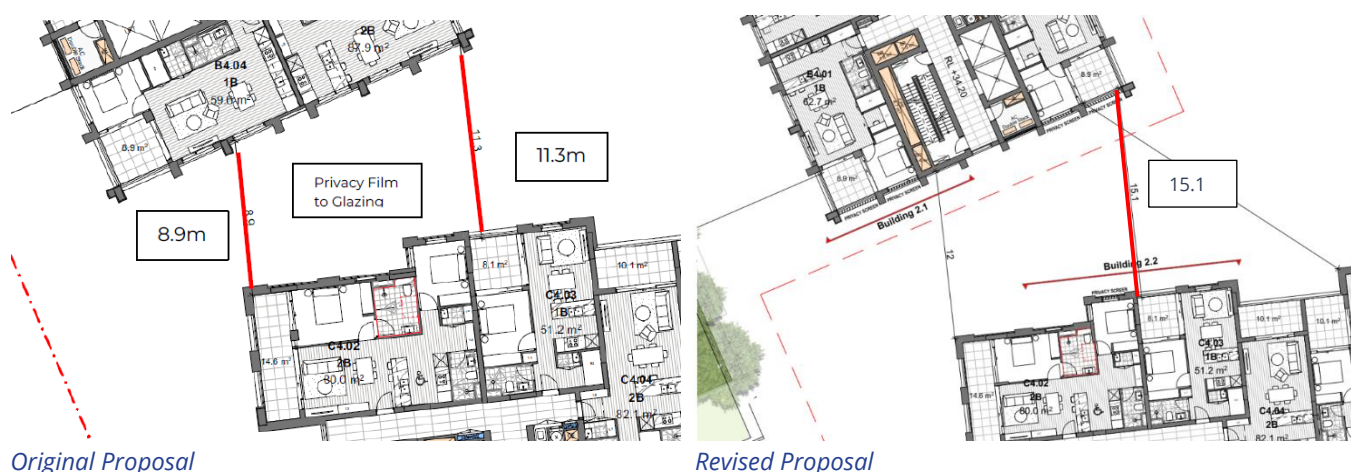


Figure 7 Comparison between SSDA (as exhibited) and proposed building separation between Building 2.1 and 2.2 above Level 3

Integrated Privacy Measures

Further privacy measures have been incorporated in Building 2.1 and Building 2.2 to ensure good quality residential amenity outcomes. These measures include the provision of privacy screens to habitable room windows and balconies, as shown in **Figure 8** below, which will limit opportunities for overlooking between dwellings and neighbouring buildings. Together with the increased building separation distances and reorientation of windows, these treatments enable visual privacy to be achieved for residents while maintaining access to outlook, daylight and ventilation. As a result, the development achieves an appropriate balance between residential amenity, building design quality and occupant privacy.

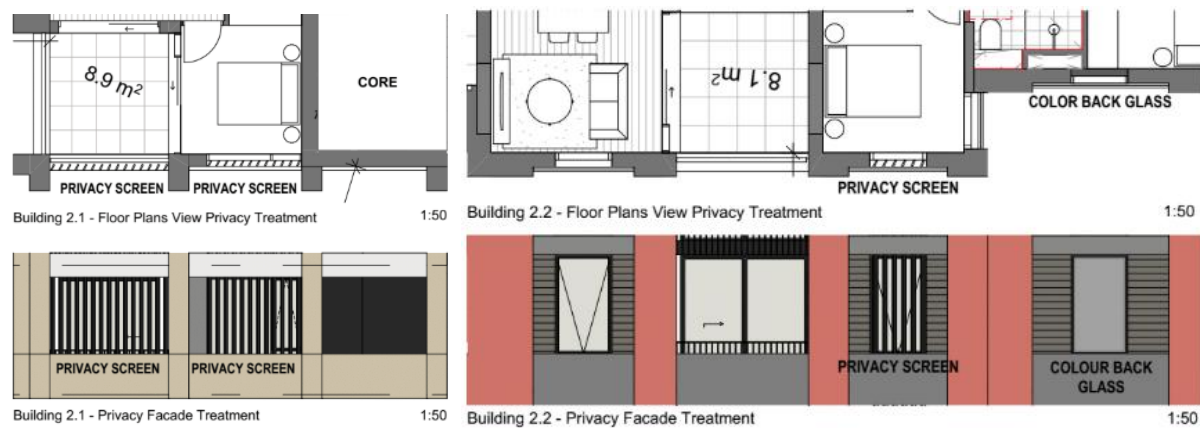


Figure 8 Privacy measures introduced between Building 2.1 and Building 2.2

Source: DKO Architects

3.2.4 Activation and Pedestrian Permeability

In response to feedback received from DPHI, SDRP and members of the public, the proposed development has been refined to improve the activation, landscaping and pedestrian permeability at street level, as detailed in the sections below.

Street Level Activation of Marcus Clark Building

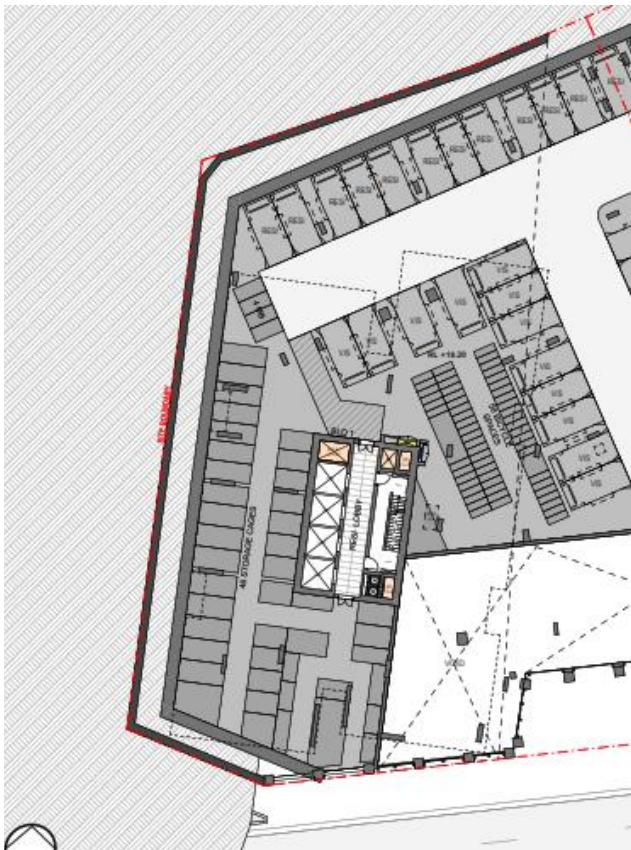
The proposal has been refined to enhance street-level activation and strengthen the relationship between the Marcus Clark Building and the surrounding public domain.

At Lower Ground Level, the commercial tenancy previously located above street level at the corner of Burelli Street and Atchison Street has been relocated to the Burelli Street frontage, providing direct access from the public realm. This change increases the visibility and accessibility of the tenancy, promotes pedestrian activity along the street, and contributes to a more active and engaging streetscape. Refer to **Figure 9** below.

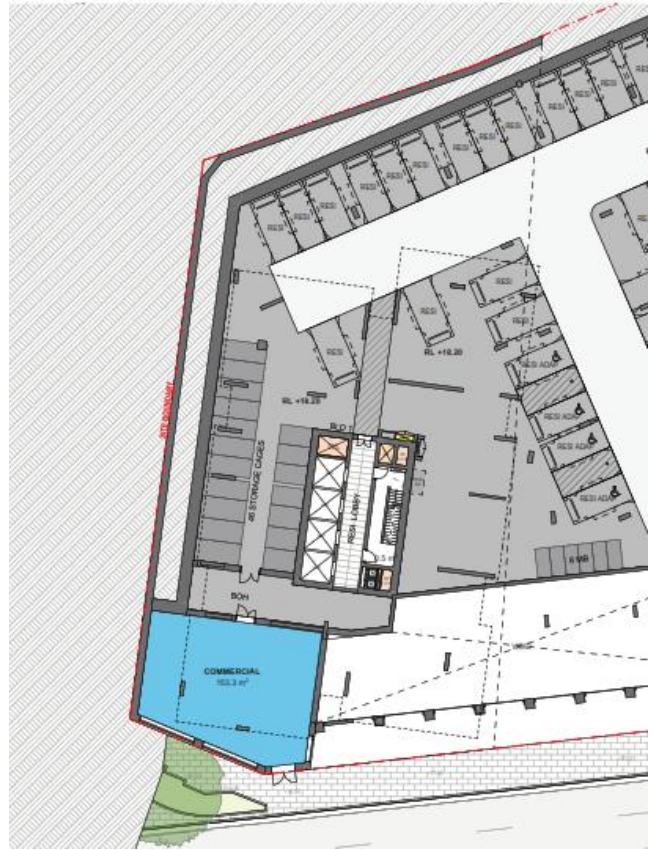
At Ground Level, the building layout has been amended to improve the activation of the street interface. The egress path has been relocated away from the street frontage, allowing the building edge to be activated within the public domain. In addition, the lobby has been repositioned to align with the street wall, creating a more active and legible frontage that contributes to pedestrian interest and passive surveillance. Refer to **Figure 10** below.

At Level 1, the existing openings and entries have been identified on the Updated Architectural Drawings at **Appendix E**. This provides greater clarity regarding the building's interaction with the public realm and demonstrates the continued activation of the façade above ground level. Refer to **Figure 11** below.

Updated Architectural Drawings have been prepared by DKO Architects and are provided at **Appendix E**. The revisions made to the street level activation are further discussed in the Design RtS Response at **Appendix MM**.



Original Proposal



Revised Proposal

Figure 9 Comparison between SSDA (as exhibited) and proposed Marcus Clark Building activation at Lower Ground Level

Source: DKO Architects



Original Proposal



Revised Proposal

Source: DKO Architects



Source: DKO Architects

The commercial tenancy frontage at the south-west corner of the building has been revised, with the building line reduced to 3m to strengthen its alignment with Burelli Street and the public domain and improve visibility from the surrounding streetscape. In conjunction with this change, the landscape treatment in front of the tenancy has been redesigned as a more civic-focused public domain space, providing a clearer and more open setting for the tenancy entrance. Refer to **Figure 12** below,

The revised landscape design improves sightlines to and from the tenancy, enhancing passive surveillance, wayfinding and the overall prominence of the commercial space. It also delivers a level and accessible pedestrian connection to the tenancy entrance, ensuring equitable access for all users and creating a more welcoming and functional interface between the building and the public realm.



Source: DKO Architects

East-West Through-Site Link

A new east-west through-site link has been introduced as part of the revised design to enhance permeability, connectivity and pedestrian movement across the site, as shown in **Figure 13** below.

The link provides a more direct and legible route through the development, encouraging pedestrian activity and reducing reliance on surrounding pedestrian networks. By creating an additional public connection, the development contributes to a more permeable urban form and supports improved walkability within the precinct.

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). The through-site link is designed to be safe, accessible and visually attractive, with active frontages and passive surveillance opportunities that enhance the pedestrian experience and foster a greater sense of place. The introduction of this connection not only improves accessibility and convenience for building occupants and visitors but also delivers a broader public benefit by strengthening east-west connectivity and promoting a more vibrant and connected public realm.

Updated Architectural Drawings have been prepared by DKO Architects and are provided at **Appendix E**. The revisions made to the through-site link are further discussed in the Design RtS Response at **Appendix MM**.

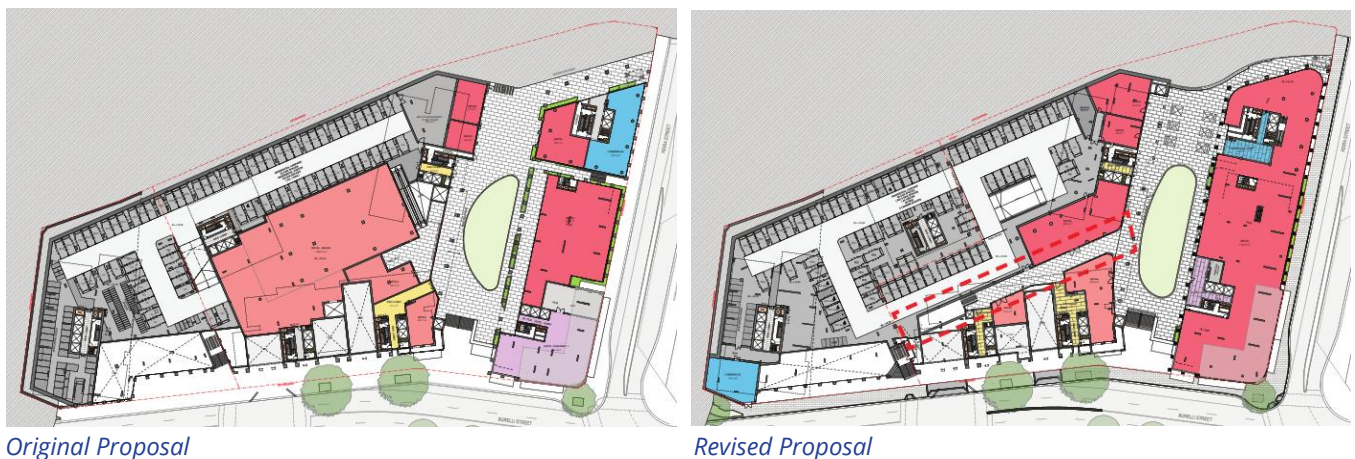


Figure 13 Comparison between SSDA (as exhibited) and proposed east-west through-site link at Lower Ground Level

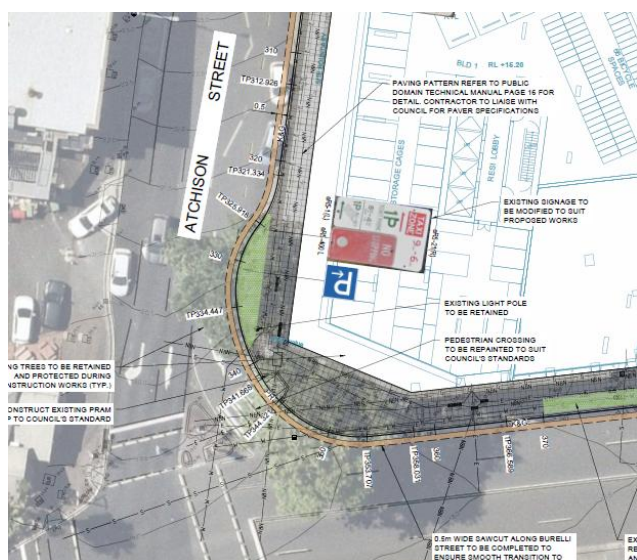
Source: DKO Architects

3.2.5 Public Domain

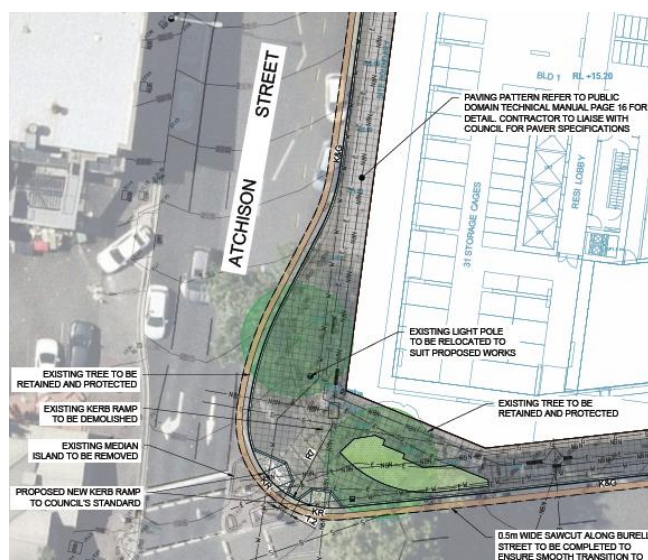
In response to feedback received from DPHI, Council and TfNSW, the proposed development has been refined to incorporate public domain upgrades, as detailed in the sections below.

Removal of Left Slip Lane at Atchison Street

The proposal includes the removal of the existing left slip lane from Atchison Street into Burelli Street, with the kerb line adjusted accordingly. The existing zebra crossing and pedestrian refuge island will also be removed, with the left-turn movement incorporated into a signalised intersection arrangement, consistent with DA-2021/957. Refer to **Figure 14** below and the Updated Public Domain Plans at **Appendix V**.



Original Proposal



Revised Proposal

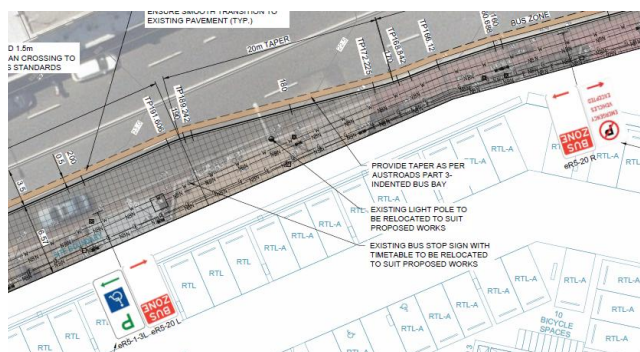
Figure 14 Comparison between SSDA and proposed corner of Atchison Street and Burelli Street

Source: SGC

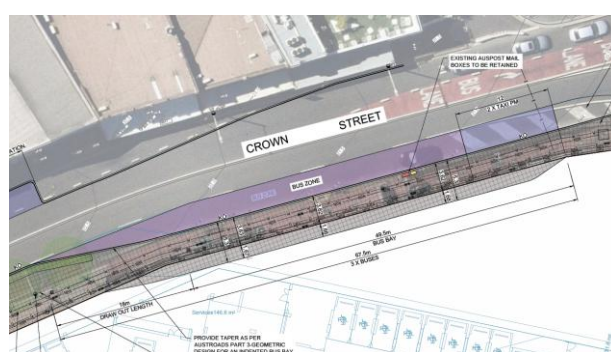
Improved Crown Street Bus Zone

The bus zone along Crown Street is amended to address the TfNSW requirements for length, specifically increasing the bus zone to 55.5m, with an increased bus bay length of 49.5m and a reduced taper of 18m. Refer to **Figure 15** below and the Updated Public Domain Plans at **Appendix V**.

The Updated Traffic Impact Assessment at **Appendix M** includes revised swept path analysis demonstrating the operation of the bus zone.



Original Proposal



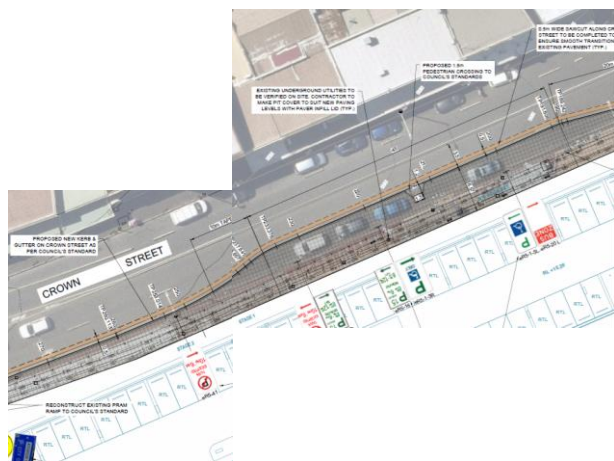
Revised Proposal

Figure 15 Comparison between SSDA and proposed Crown Street bus zone

Source: SGC

Improved Kerb Alignments

The proposal includes amendments to widen the kerb on both sides of Crown Street and reduce the length of the pedestrian crossings to improve safety. Refer to **Figure 16** below and the Updated Public Domain Plans at **Appendix V**.



Original Proposal



Revised Proposal

Figure 16 Comparison between SSDA and proposed Crown Street kerb alignment

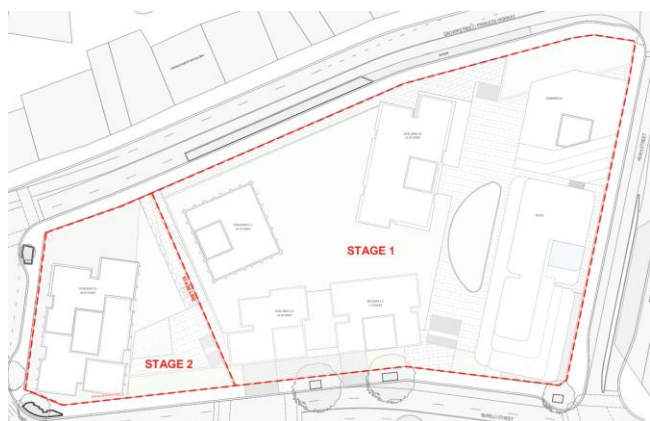
Source: SGC

3.2.6 Amendment to Staging

Although the development would continue to be developed in two (2) stages, the separation between staging has been revised, as follows:

- Stage 1: All proposed works, including demolition and site preparation works (excluding existing the Spotlight buildings works)
- Stage 2: All proposed works within the Spotlight buildings.

Refer to **Figure 17** below.



Original Proposal



Revised Proposal

Figure 17 Comparison between SSDA and proposed staging

Source: DKO Architects

3.2.7 Other Design Refinements

The project has also undergone several other detailed design refinements in response to the submissions received, these refinements are aimed at enhancing the developments functionality and amenity without altering the overall design intent. These include:

- Introduction of 10 car share spaces at the parking entrance;
- Reduced provision of parking spaces from 774 spaces to 675 spaces (-99);
- Removal of supermarket tenancy and the associated 80 parking spaces; and
- Location of all waste and bin stores on Basement 01 to align with loading dock location;
- Introduction of on-site linen/laundry room to the Hotel.

These minor alterations can be seen in the Updated Architectural Drawings at **Appendix E**.

3.3 Further Assessment Undertaken

In response to the submissions received as well as the design refinements made, further assessment of the impact of the proposed development has been undertaken. A list of further assessment and supporting documents are outlined in **Table 7**.

Table 7 Further Assessments Undertaken

Impact	Summary	Reference
Additional Traffic and Parking Assessment	Refer to Section 3.3.1	Appendix M
Additional Visual Impact Analysis	Refer to Section 3.3.2	Appendix DD
Additional Overshadowing Analysis	Refer to Section 0	Appendix E
Crime Prevention Considerations	Refer to Section 3.3.4	Appendix L
Additional Noise Assessment	Refer to Section 3.3.5	Appendix Y
Updated review of Apartment Design Guide Compliance	Refer to Section 3.3.6	Appendix F
Further analysis of Strategic Compliance	-	Appendix C

3.3.1 Additional Traffic and Parking Assessment

Prohibited Right Turn

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 specific signage elements to be provided during the subsequent design documentation phase.

Coupled with this, a median strip will be constructed along the Burrelli Street frontage to prohibit right turn movements, ensuring that only vehicle movements will be left-in/left-out only to and from Burelli Street.

Queuing

Further queuing analysis has been undertaken to assess the adequacy of vehicle queue storage at the site entry. The driveway layout provides capacity for three vehicles to queue in front of the roller shutter.

The analysis indicates that the probability of more than three (3) vehicles arriving simultaneously and exceeding the available queue storage is only 1.1%. Accordingly, the proposed queue storage accommodates the 98.9th percentile queue demand, exceeding the 98th percentile design requirement specified in Part 3.5 of AS/NZS 2890.1.

On this basis, the provision of queue storage for three (3) vehicles is considered adequate and demonstrates compliance with the relevant AS/NZS 2890.1 design criteria.

Signalised Intersection

As discussed in **Section 3.2.5**, in response to the removal of the existing left slip lane from Atchison Street into Burelli Street, a signalisation of this intersection is proposed. Revised SIDRA modelling and a swept path analysis have been prepared to demonstrate the operation of the signalised intersection. Further detailed design of the signalisation, including civil design, traffic signal design and road safety auditing, will be undertaken during the detailed design phase and can be appropriately addressed through conditions of consent.

Non-Residential Parking Credits

The approved car parking rate for retail and commercial uses is one space per 330m² of GFA, reflecting the application of the parking credit available under Clause 7.5 of Chapter E3 of the DCP. This reduced parking rate is consistent with Council's strategic objective of limiting non-residential parking provision within the town centre to minimise private vehicle use and associated traffic generation.

Based on the approved parking rate and the revised non-residential gross floor area of 16,589m², a total of 52 parking spaces is required for the retail and commercial components of the development. The proposal provides 52 retail and commercial parking spaces and therefore satisfies the applicable parking requirement.

3.3.2 Additional Visual Impact Analysis

Additional perspectives and photomontages of the proposed development have been prepared from a range of levels within the following nearby apartment buildings:

- 15 Railway Parade
- 3 Rawson Street
- 12 Regent Street
- 10 Thomas Street

An overview of the visual impact on each of these additional apartment buildings is provided below. Overall, the impacts are considered reasonable. The proposed development is broadly consistent with the approved building envelope and would result in a comparable level of view loss and visual change. Given the site's CBD location and the applicable LEP height and FSR controls, some change to private views is an expected consequence of redevelopment and growth of the Wollongong CBD. While the proposal would result in a modest additional loss of sky and coastal views compared to the approved scheme, these features would remain visible. On balance, the impacts are considered acceptable having regard to the planning framework, approved development outcome, and benefits of the proposal.

15 Railway Parade

Four (4) additional viewpoints have been assessed from 15 Railway Parade, one of which is shown in **Figure 18** below. The visual impact on this building is considered acceptable. While the affected views are of medium-to-high value, the existing outlook is already strongly urban in character and framed by surrounding tall buildings. Within this context, the proposal would be viewed as part of an established and evolving high-density city-centre environment. The resulting change to views is therefore considered reasonable.

3 Rawson Street

Six (6) additional viewpoints are assessed from 3 Rawson Street, one of which is shown in **Figure 19** below. Overall, the visual impact is considered acceptable. Although the affected views are predominantly of medium value, they are experienced from secondary living areas, reducing the significance of the impact. Furthermore, the proposal would be viewed within a precinct that is already transitioning towards a denser high-rise urban form. In this context, the degree of visual change is considered reasonable.

12 Regent Street

Five (5) additional viewpoints are assessed from 12 Regent Street, one of which is shown in **Figure 20** below. The visual impact is considered acceptable. While some of the affected views are of medium-to-high value, they are obtained from secondary living areas, which moderates the importance of the impact. Although lower-level apartments would experience a greater degree of view change, the proposal remains reasonable when considered against the existing planning framework and the ongoing transition of the locality towards a higher-density built form.

10 Thomas Street

One (1) additional viewpoint is assessed from 10 Thomas Street, which is shown in **Figure 21** below. The visual impact is considered acceptable. The affected view is of low-to-medium value and is experienced from a secondary living area, reducing the significance of the impact. Given the comparatively limited view value and the urban context of the surrounding area, the resulting degree of visual change is considered reasonable.

Within **Figure 18 - Figure 21** below, the proposed massing outline is illustrated in red, and the massing outline of existing development consent (DA-2021/957) is illustrated in blue.



Figure 18 Additional viewpoint from 15 Railway Parade

Source: Urbaine



Figure 19 Additional viewpoint from 3 Rawson Street

Source: Urbaine



Figure 20 Additional viewpoint from 12 Regent Street

Source: Urbaine



Figure 21 Additional viewpoint from 10 Thomas Street

Source: Urbaine

3.3.3 Additional Overshadowing Analysis

As discussed in **Section 3.2.1**, increased upper-level setbacks have been incorporated into Building 1, Building 2.3 and the Hotel Building to minimise built form impacts and maximise solar access to MacCabe Park located to the south-east of the site. By stepping back the upper levels of these buildings along their eastern elevations, the extent of built form facing the park has been reduced, resulting in reduced shadow impacts.

As a result of the reduced building massing, the revised proposal no longer casts additional shadow over MacCabe Park at 2pm during mid-winter, as shown in **Figure 22** below. This design response represents an improvement from the original proposal and enhances the usability, comfort and amenity of this important public open space, while balancing the development objectives of the site.

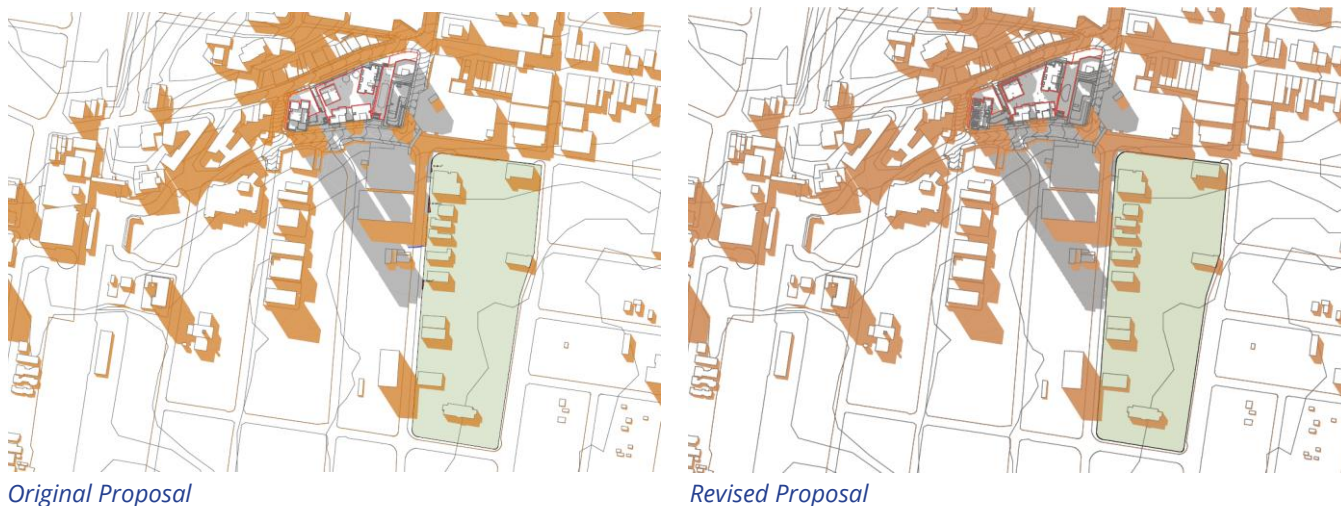


Figure 22 Comparison between SSDA and proposed overshadowing of MacCabe Park at 2pm mid-winter

Source: DKO Architects

3.3.4 Crime Prevention Considerations

Crime prevention principles have been further integrated into the design in response to the introduction of the new east-west through-site link. The through-site link has been designed to provide improved pedestrian connectivity while maintaining a safe and secure environment for residents, workers and visitors.

Importantly, the through-site link will operate only during business hours and will be closed outside these times through the use of secure gates. Restricting public access during non-operational hours will assist in preventing unauthorised access, reducing opportunities for anti-social behaviour and improving overall site security.

In addition, the through-site link has been designed to maximise natural surveillance through clear sightlines, active frontages and visibility from adjoining building uses and public areas. These measures will increase passive surveillance and contribute to a safe and welcoming pedestrian environment during operating hours.

Collectively, the combination of controlled access, passive surveillance and clear pedestrian routes ensures that the through-site link enhances permeability and connectivity while maintaining a high standard of safety and security consistent with Crime Prevention Through Environmental Design (CPTED) principles.

This additional mitigation measure is identified in **Section 6.1.1** below and included in the Updated Mitigation Measures at **Appendix B**.

3.3.5 Additional Noise Assessment

Further acoustic assessment has been undertaken to confirm the required building treatments for dwellings located adjacent to car parking areas, loading and access areas, and lift shafts.

The assessment confirms that dwellings adjoining car parking, loading and access areas will incorporate construction that meets or exceeds the minimum acoustic requirements of the BCA. This includes walls achieving a minimum acoustic performance of $R_w 50$ and floor constructions achieving $R_w + C_{tr} 50$, ensuring effective attenuation of noise from adjoining common areas and vehicle movements.

For dwellings adjacent to lift shafts, enhanced acoustic treatments will be provided, including wall constructions achieving a minimum performance of $R_w + C_{tr} 50$ and discontinuous wall construction, comprising separated wall leaves with a minimum 20mm cavity, to minimise the transmission of operational lift noise and vibration.

Subject to the incorporation of these acoustic treatments and compliance with the BCA requirements, noise associated with the operation of car parking, loading and access areas, and lift shafts is expected to be appropriately managed. Accordingly, the acoustic amenity of future residents will be protected and acceptable internal noise levels achieved.

This additional mitigation measure is identified in **Section 6.1.2** below and included in the Updated Mitigation Measures at **Appendix B**.

3.3.6 Apartment Design Guide Compliance

A revised Design Report, including an updated Apartment Design Guide (ADG) compliance assessment, has been prepared by DKO Architects and is included in **Appendix F**.

The revised proposal is generally consistent with the key ADG design criteria. There are, however, a limited number of instances where specific numerical design criteria are not achieved. Notwithstanding this, the proposal continues to satisfy the relevant ADG objectives and delivers a high-quality design outcome.

It is also noted that Section 147 of the Housing SEPP provides that compliance with the ADG design criteria is not mandatory when determining an SSDA for residential apartment development.

Part 3E – Deep Soil Zones

The revised scheme, developed in response to submissions, has resulted in a reduced provision of deep soil across the site from 971m² (7.4%) to a total of 743m² (5.7%). This outcome is a direct result of the reduced setback to the commercial buildings along Burelli Street, in response to DPHI and SDRP recommendations, and the expansion of the bus zone on Crown Street in accordance with TfNSW requirements.

The revised ground plane design strengthens the relationship between the commercial tenancy and the public domain. This approach maximises landscaping opportunities and achieves an appropriate balance between public domain activation and landscape outcomes.

The proposed deep soil provision is considered acceptable given the site's location within the high-density urban environment of the Wollongong CBD, and the wider objective of providing a large quantum of non-residential uses at ground level to provide active frontage across the site.

Part 3F – Visual Privacy

Overall, the development achieves a high standard of visual privacy. Notwithstanding the building separation distances for the residential towers, a single instance has been identified where the ADG numerical criteria for visual privacy is not achieved between the Hotel Building and the Commercial Building. This has been appropriately mitigated through the design response, including the absence of windows or other openings on the relevant hotel façades facing the commercial building. The Hotel Building is also not directly oriented towards the Commercial Building, thereby maintaining outlook opportunities for hotel guests while effectively avoiding adverse privacy impacts between the two buildings.

As discussed in **Section 3.2.3**, modifications to the scheme have increased building separation distances between Building 2.1 and 2.2. While some instances of non-compliance with the building separation controls in Wollongong LEP 2009 remain, these controls prevail over the ADG criteria and are addressed in detail within the revised Clause 4.6 Variation Request at **Appendix BB**.

Notwithstanding the proposed variation, the objectives of the building separation development standard are achieved. The development provides a reasonable and well-resolved design outcome that is consistent with the underlying objectives of both the Wollongong LEP 2009 and the ADG building separation controls.

Part 4F – Common Circulation and Spaces

All lift cores have a minimum of two lifts and Building 2.1 and Building 2.3 have less than 40 apartments sharing a single lift. Other apartment buildings continue to slightly exceed the requirement, however reduced from the original proposal:

- Building 1: 55.5 apartments per lift
- Building 2.2: 41.5 apartments per lift (reduced by 0.5 apartments per lift)
- Building 3: 50 apartments per lift (reduced by 1.5 apartments per lift)

The objective of this part of the ADG is to ensure common circulation spaces achieve good amenity and properly service the number of apartments. Therefore, the slight exceedances to this requirement will be mitigated through the provision of lifts specified to achieve compliance with relevant ISO standard [ISO 8100-32:2020]. This will ensure an adequate level of service is provided.

4.0 Response to Submissions

The Detailed Response to Submissions at **Appendix D** provide a comprehensive overview of the submissions raised by government agencies, key stakeholders, organisations, and the community. It includes detailed responses to each of the issues raised during the consultation period.

5.0 Updated Project Summary

Following exhibition of the proposed development, a number of design refinements and amendments have been made in response to the submissions received. Importantly, these refinements and changes only result in minor numerical changes to the project summary and as such do not raise any additional material environmental impacts. These refinements do not change what the application is seeking consent for, and therefore an amendment to the proposed development is not required.

The revised development seeks consent for the following. Words to be removed are shown in ~~bold strike through~~ and words to be inserted are shown in ***bold italics***.

- Demolition of existing structures on the site, retention of heritage facades, tree removal and site excavation for new basement.
- Construction of a new mixed-use development consisting of:
 - Four residential towers, ranging from 16 to 38 storeys and comprising ~~546 540~~ apartments including:
 - ~~414 408~~ market apartments.
 - 132 affordable apartments.
 - Residential lobbies and podium.
 - Communal open space.
 - A 10-storey commercial office building, an 8-storey hotel comprising ~~166 80~~ rooms, and numerous retail tenancies (~~including a supermarket~~) consisting of:
 - ~~10,009 16,589~~ sqm of commercial/~~retail~~ GFA.
 - ~~8,793 7,443~~ sqm of hotel GFA.
 - ~~3,781 sqm of retail GFA.~~
 - ~~1,510 sqm of retail supermarket GFA.~~
- Car, motorcycle and bicycle parking for residents, workers and visitors across two basement levels, mezzanine, lower ground and levels 1 and 2 including:
 - ~~774 675~~ car parking spaces, including:
 - ~~547 525~~ residential spaces (including accessible spaces).
 - ~~49 78~~ residential visitor spaces.
 - ~~63 commercial/retail/residential visitor spaces.~~
 - ~~25 52~~ commercial/retail (staff) spaces.
 - 10 hotel (staff only) spaces.
 - ~~80 retail (supermarket) spaces.~~
 - ~~10 share spaces.~~
 - Five (5) loading bays.
 - ~~45 residential visitor bicycle parking spaces.~~
 - ~~320 304~~ bicycle parking spaces.
 - 47 motorcycle parking spaces.
- New public open space including a new public plaza.
- Associated landscaping and public domain works.

6.0 Updated Mitigation Measures

As a consequence of the project amendments described in **Section 5.0** the matters raised in submissions discussed at **Section 2.1**, and the further environmental assessment outlined in **Section 3.0**, the Mitigation Measures for the project have been reviewed and updated. The updated Mitigation Measures are outlined below and in **Appendix B**.

6.1.1 Crime Prevention

The following mitigation measure will be implemented to manage crime prevention of the new through-site link:

- (CPTED-8) Access to the east-west through-site link will be limited to business hours, with secure gates used to restrict public access outside operating hours.

6.1.2 Noise and Vibration

The following mitigation measure will be implemented to manage the impact of noise-generating elements of the development on adjoining dwellings:

- (NV-5) Acoustic treatments will be incorporated into dwellings adjoining noise-generating elements of the development to protect resident amenity, including:
 - Dwellings adjacent to car parking, loading and access areas will incorporate wall constructions achieving a minimum acoustic rating of Rw 50 and floor constructions achieving a minimum acoustic rating of Rw + Ctr 50.
 - Dwellings adjacent to lift shafts will incorporate wall constructions achieving a minimum acoustic rating of Rw + Ctr 50, including discontinuous wall construction with separated wall leaves and a minimum 20mm cavity to minimise the transmission of noise and vibration.

7.0 Updated Project Justification

This section provides an updated justification and evaluation of the project, incorporating any relevant issues raised in submissions and the Applicant's response to these issues.

Any design changes or assessments undertaken are in response to issues raised in submissions or further design development and have not increased the cumulative impact of the development. As such, the justification for the project as previously outlined in the Environmental Impact Statement and Modification Report remains applicable through the presented responses which comprise meaningful amendments to the Proposal.

7.1 Project Design

Overall, the proposed development continues to deliver a well-considered built-form outcome that contributes meaningfully to both market and affordable housing supply in a location highly accessible to public transport, open space and employment opportunities. The scheme provides a high level of residential amenity through a generous provision of high-quality communal open space and supporting facilities distributed throughout the site. The built form remains compatible with its surrounding context, effectively balancing the need to respond sensitively to the area's existing character while supporting sustainable, well-managed growth within Wollongong that aligns with the State Government's aspirations and objectives to deliver more housing.

7.2 Strategic Context

The proposed development remains aligned with the strategic framework as detailed in the EIS, given that:

- It will provide 540 apartments in a strategic location within the Wollongong City Centre.
- It directly responds to the current housing affordability crisis by delivering 132 affordable apartments on site.
- It will support the delivery of approximately 922 ongoing FTE jobs and 1,213 jobs during the construction phase of the development.
- It will include activating uses at the Ground level to enhance the vibrancy of the locality in alignment with the intent of the Victoria Road corridor and provide convenience to residents and visitors. Further, it will allow for the enhancement of the precinct's public domain, introducing pedestrian-focused through site links from Wicks Park to a new pocket park fronting Farr Street, as well as recreation spaces within the site.
- It delivers a built form that is complementary with the surrounding context, respecting the character of its environs.

7.3 Statutory Context

The proposed development has been assessed against the relevant statutory requirements, including matters specified in the SEARs issued 8 October 2024 and Sections 190 & 192 of the EP&A Regulation.

The proposed development remains consistent with the relevant land use permissibility and statutory provisions as detailed in the EIS.

7.4 Community Views

Prior to the Public Exhibition, the Applicant consulted with relevant stakeholders to understand the community and stakeholders views. As outlined in **Section 3.1**, the exhibition feedback has been considered, and design refinements have been made where considered necessary. The relevant design amendments have been developed through consultation with relevant stakeholders, and as such all feedback has been considered and responded to in this RTS Report.

7.5 Likely Impacts of the Development

Having regard to the natural environment, built environment and economic and social impacts of the proposed development, the likely impacts of development are considered acceptable as outlined in the following sections.

Additionally, the proposed mitigation measures detailed within **Section 6.0** and **Appendix B** outlined mitigation and management measures that will minimise the impact of the proposed development.

7.5.1 Biophysical

The assessment of impacts demonstrates that:

- The proposal will not have any significant effect on threatened species, populations or ecological communities or their habitat arising from the construction or uses of the proposed development. The Proposal will not have an impact on any matters of national environmental significance under the *Environmental Protection and Biodiversity Conservation Act 1999 (Cth)*, or *Biodiversity Conservation Act 2016 (NSW)*; and
- The proposal will not result in any undue adverse environmental impacts. Potential sources of risk associated with the construction works and operation of the proposed development can be managed with the appropriate safeguards and mitigation measures as outlined at **Appendix B**.

7.5.2 Built Environment

The proposed development has undergone key refinements to internal configurations, landscaping and façades. These actions are justified as they seek to provide an appropriate design response to issues raised by the relevant authorities and community. Therefore, the likely built environment impacts are considered acceptable for the following reasons:

- Amendments to building massing is to improve solar access to MacCabe Park.
- Amendments to yield are a result of the amended massing, the proposed removal of the supermarket tenancy from Building 1, the increased GFA on the typical layout in Building 1 and the increased provision of retail premises in the Commercial Building.
- Adjustments to public domain are in accordance with TfNSW recommendations.
- The proposal maintains high levels of residential amenity and continues to comply with the objectives of the ADG.

7.5.3 Social and Economic

The likely social and economic impacts of the proposal will generally be positive. This includes:

- Facilitating the delivery of 540 high quality apartments, including 132 affordable apartments, in an accessible and amenity-rich location in the Wollongong CBD to support the shortfall of housing stock in NSW.
- Strengthening the role of Wollongong CBD's as a commercial and strategic centre by creating a truly mixed-use development that will generate employment and economic growth and reinforce the primacy of the centre.
- Deliver a development with a public domain outcome that has a high level of accessibility and amenity, comprising comprehensive landscape design principles, CPTED principles, and streetscape activation articulation.
- Creating new and attractive public spaces, including a new high quality public plaza and an activated through-site link to connect pedestrians between the site's boundaries, allowing for improved pedestrian access to active transport options.
- Retention of the Marcus Clark Building heritage façade, and incorporation of this and the Grand Hotel building façade into the proposed redevelopment ensuring important heritage and character is retained and celebrated as part of the redevelopment.
- Facilitating a residential population at the site to support increased activation in the locality beyond business hours. This has the potential to subsequently benefit Wollongong's night-time economy and status as a strategic centre within which people can live, work, and play.
- Contribute to direct employment during construction and operation of the development.

7.6 Suitability of the Site

Having regard to the characteristics of the site and its immediate surrounding context, the proposed development is suitable for the site for the following reasons:

- It responds to the strategic vision for the delivery of additional housing supply in key locations, including those with locational proximity to key transport nodes such as Wollongong train station.
- It responds to the Council's vision for the renewal and growth of the Wollongong Town Centre as the primary strategic role servicing the local community.

- It provides a mix of uses that will enable the population growth of both residents and workers in a strategic area, reinforcing the role of Wollongong LGA as a residential community and stimulating a competitive employment market through creating a more active and attractive precinct.
- It delivers high quality housing at a key site, improving housing stability and diversity in Wollongong as well as supporting the creation of a series of mixed-use buildings, including 15% affordable housing.
- The site is not affected by critical constraints, such as flooding, bush fire hazards, endangered species and contamination or hazardous material.
- The proposal is consistent with the objectives of the E2 Commercial Centre zone and the proposed land uses are permissible with consent on the site.

7.7 Public Interest

Having regard to the public interest, the proposed development is in the public interest for the following reasons:

- It will revitalise a strategically located site within walking distance of existing transport infrastructure, retail, social, cultural, open space and employment opportunities.
- It will improve the public domain within and around the site, including provision of a new public plaza and an activated through-site link to create a public thoroughfare.
- It will foster social connectedness and cultural expression through a high-quality public domain, Connecting with Country-inspired landscape design, and activated ground floor tenancies.
- It will demonstrate excellence in both design and ecologically sustainable development initiatives.
- It will deliver 540 dwellings, which will take advantage of this accessible location, proximity to services and existing networks with direct connections to major employment destinations.
- It will deliver 132 affordable dwellings which directly addresses the critical need for affordable housing in the area.
- It will retain important local heritage through the retention of the Marcus Clark and Grand Hotel facades.
- It will create a more vibrant and activated precinct that provides a range of day-to-day services and offerings for employees, visitors, and the local community, tailored to support existing creative and diverse offerings in Wollongong.
- It will create new jobs during the construction and operational phases of the development, providing employment and amenities for residents on site and in the greater precinct.
- It will include 4,601m² of publicly accessible open space, with a diverse array of landscaped, passive and active recreational spaces.
- The public interest is best served by the orderly and economic use and development of land for permissible purposes in a form which is cognisant of and does not unreasonably impact on surrounding land uses and which satisfies a market demand.

8.0 Conclusion

As set out in this Submissions Report, the Applicant has reviewed each of the submissions made by members of the general public and State and local government agencies. In response to issues raised in these submissions, as well as matters identified by the DPHI, the Applicant has undertaken further environmental assessment and proposed minor design amendments in order to respond to matters raised in the submissions.

This Submissions Report has set out these matters as required under Section 59(2) of the EP&A Regulation and in accordance with the DPHI's State Significant Development Guidelines, including Appendix C – Preparing a Submissions Report.



At Colliers, we are enterprising.

We maximize the potential of property and real assets to accelerate the success of our clients, our investors and our people.

Our expert advice to property occupiers, owners and investors leads the industry into the future. We invest in relationships to create enduring value. What sets us apart is not what we do, but how we do it. Our people are passionate, take personal responsibility and always do what's right for our clients, people and communities. We attract and develop industry leaders, empowering them to think and act differently to drive exceptional results. What's more, our global reach maximizes the potential of property, wherever our clients do business.

colliers.com

Colliers Urban Planning

Accelerating success.