

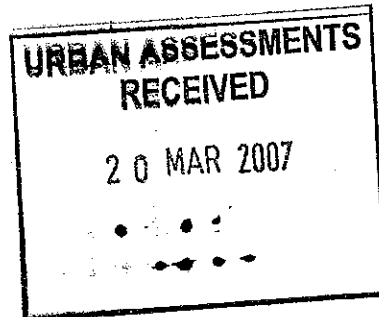


**WOLLONGONG**  
City of Innovation

16 March 2007

41 Burelli Street Wollongong Locked Bag 8821 Wollongong NSW 2500  
DX: 27811 Wollongong Court Ph: (02) 4227 7111 Fax: (02) 4227 7277  
Email: council@wollongong.nsw.gov.au Web: www.wollongong.nsw.gov.au  
ABN 63 139 525 939 - GST Registered

The Director  
Urban Assessments  
NSW Department of Planning  
GPO Box 39  
SYDNEY NSW 2001



Attention: Mr A Sutherland

Dear Sir

**REQUEST FOR KEY ISSUES AND ASSESSMENT REQUIREMENTS - PROPOSED STAGED MIXED USE RETAIL, COMMERCIAL OFFICE & RESIDENTIAL DEVELOPMENT, INCLUDING THE PROPOSED MAJOR REDEVELOPMENT & UPGRADING OF THE CROWN CENTRAL SHOPPING CENTRE COMPLEX  
YOUR REF: MP 06-0209 S06/00441**

**PROPERTY: PART OF KEIRA STREET ROAD RESERVE, PART OF RICHARDSON STREET ROAD RESERVE, PART OF CROWN LANE ROAD RESERVE, LOT 1, DP 823263, LOT 260, DP 823263, LOT 270, DP 8473, LOT 250, DP 823262, LOT 1, DP 503512, LOT 100, DP 568649, LOT 7, DP 521621, LOT 1, DP 510608, LOTS A & B, DP 403097, LOT 1, DP 797590, LOT 1, DDP 799494, LOT 100, DP 734993, LOTS 1 & 2, DP 17888 AND LOT 1, DP 154592, GENERALLY BOUNDED BY CROWN STREET, KEIRA STREET, MARKET STREET, CHURCH STREET, BURELLI STREET, RICHARDSON STREET, CROWN LANE & REGENT STREET, WOLLONGONG**

I refer to the Department's correspondence received by Council on Thursday 8 March 2007 concerning the Part 3A project by GPT Group Ltd for the proposed major expansion of the existing Wollongong Crown Central shopping centre involving the major upgrading of the existing northern Crown Central shopping centre and the erection of a new retail shopping centre complex with residential and commercial tower buildings on the western side of Keira Street (opposite the existing Crown Central shopping centre).

This is to advise that a preliminary review has been made by Council staff in respect to the Part 3A project and as a result the following key issues / documents are requested to be addressed as part of the lodgement of any Development Application for the proposed development:-

1. The preparation of a comprehensive Statement of Environmental Effects (SEE) (ie prepared by a suitably qualified and experienced town planning consultant) which addresses a range of matters, including but not necessarily limited to the following matters / issues:-
  - (i) Full details of the nature of the proposed development, including:-
    - (a) Legal description of the various parcels of land and details of any existing easements or other restrictions pertaining to the each parcel of land within the subject site;

- (b) Development description of the various components in each stage of the development;
  - (c) Breakdown in Gross Floor Area (GFA) for each component in each stage of the development;
  - (d) Proposed staging program and the anticipated timeframes for completion of each respective stage in the development (ie in the event that consent is ultimately granted by the Minister for Planning);
  - (e) Proposed access arrangements to / from the site, including proposed patron car parking areas and the truck loading / unloading access arrangements; and
  - (f) The estimated capital value of the Stage 1 redevelopment and expansion of the Wollongong Crown Cental shopping centre and the Stage 2 commercial office and residential towers.
- (ii) The proposal's relationship / compliance with the following environmental planning instruments, development control plans and policies:-
- (a) State Environmental Planning Policy (Major Projects) 2005
  - (b) Wollongong City Centre Local Environmental Plan 2007;
  - (c) Wollongong City Centre Development Control Plan 2007;
  - (d) Wollongong City Centre Civic Improvement Plan 2007;
  - (e) Wollongong City Centre Vision 2007;
  - (f) State Environmental Planning Policy No. 11 – Traffic Generating Development;
  - (g) State Environmental Planning Policy No. 55 – Remediation of Land;
  - (h) State Environmental Planning Policy No. 65 – Design Quality of Residential Flat Development & Residential Flat Design Code;
  - (i) Draft State Environmental Planning Policy No. 66 – Integration of Land Use and Transport;
  - (j) State Environmental Planning Policy No. 64 – Advertising and Signage;
  - (k) Illawarra Regional Strategy 2006-31;
  - (l) Wollongong City Council Development Control Plan No. 49 – Residential Development;
  - (m) Wollongong City Council Access and Movement Strategy 2005;
  - (n) Wollongong City Council Drainage Design Code;
  - (o) Wollongong City Council Outdoor Restaurant Policy 2002;
  - (p) Wollongong City Council Development Assessment and Compliance Notification Policy February 2007;
  - (q) Wollongong City Council Geotechnical Development Control Plan 2006; and
  - (r) Wollongong City Council Draft Landscape Technical Policy 98/4.

Note:

The review of the proposal's compliance with various environmental planning instruments, development control plans and policies is recommended to be undertaken by way of a comprehensive Table of Compliance in which

compliance with each development standard / requirement should be highlighted. Any departure from a requirement / development standard is recommended to be subject to a comprehensive written justification outlining the reasons as to why compliance with this standard / requirement is unnecessary and unreasonable in the circumstances of the case and include sufficient environmental planning grounds to justify the contravention of the development standard or requirement.

2. The BBC preliminary assessment report dated February 2007 seeks the waiving of the architectural design competition process through the Director – General granting an exemption to the process, pursuant to the provisions of sub-clause 22B(5) of the WCC LEP 2007. This request is primarily on the basis of the previous extensive design phase undertaken by GPT since mid - 2006.

However, the project has an estimated capital value of \$350 Million and is likely to be the largest development in the city centre over the next decade. The scale, size, form and nature of the project may also warrant a formal architectural design process to be undertaken in line with clause 22 of WCCLEP 2007.

If the Director – General was to agree to the GPT Group’s request for waiving of the design competition process, then Council and the Director – General are likely to receive a number of similar requests from other property developers whom similarly have undertaken extensive design processes prior to DA lodgement over the last 12 months, whilst awaiting the final framework of the new city centre planning documents.

3. The BBC preliminary assessment report also seeks a concession / variation to the building setback requirements contained in both the WCCLEP 2007 & WCC DCP 2007 for the commercial office and residential tower elements in the proposal. The building setback requirements form part of the building envelope controls contained in WCCLEP 2007 & WCC DCP 2007 and were originally developed by the Cities Centres taskforce of the Department in consultation with Council. From Council’s understanding, this was based upon rigorous ‘road testing’ of building envelope controls prior to implementation into WCCLEP 2007 & WCC DCP 2007.

As the Department is aware, WCCLEP 2007 & WCC DCP 2007 were formally gazetted on 31 January 2007. In this regard, it is considered important that the new development standards / requirements contained in WCCLEP 2007 & WCC DCP 2007 are consistently applied by both Council and the Department at this early stage, in order to maintain the integrity of the new planning framework. This approach has also been advocated by the NSW Land & Environment Court in a number of previous judgments, most notably, in *Stockland Development Pty Ltd v Manly Council* [2004] NSWLEC 472, in which McClellan, CJ stated “...that a development control plan which has been consistently applied by a council will be given significantly greater weight than one which has only been selectively applied.”

Accordingly, Council recommends that the Department thoroughly consider any reasons for the proposed variations to the building setback / envelope requirements in both WCCLEP 2007 & WCC DCP 2007 prior to the granting of any such variation.

4. The BBC preliminary assessment report also seeks a concession / variation to the maximum 1,200 m<sup>2</sup> floor plate size and maximum 25 metre building depth requirements in WCC DCP 2007 (clause 2.3) for the proposed commercial office building tower. As

per above, the maximum floor plate & maximum building depth provisions are part of the overall building envelope controls to determine building form in the commercial core. Therefore, it is recommended that the Department advise the applicant that the proposed commercial office tower is required to be redesigned in line with the maximum 1,200 m<sup>2</sup> floor plate size and maximum 25 metre building depth requirements under clause 2.3 of WCC DCP 2007.

5. The BBC preliminary assessment report indicates that the west Keira Street mixed use retail shopping centre and commercial office and residential tower component (Stage 2) will involve a total gross floor area of 86,115m<sup>2</sup> (including 24,383m<sup>2</sup> half- above-ground retail carparking plus all above-ground residential and commercial office parking) with a corresponding floor space ratio (FSR) of 7.43:1. The BBC report also indicates that proposed redevelopment and expansion of Crown Central shopping centre component (ie eastern part of the site) equates to a total gross floor area of 44,553m<sup>2</sup> (including 32,138m<sup>2</sup> retail floorspace and 12,415m<sup>2</sup> of half above-ground retail parking) with a corresponding floor space ratio (FSR) of 3.49:1. In conclusion, the BBC report states that the combined Crown Central & West Keira sites will have a corresponding total floor space ratio (FSR) of 5.19:1 (inclusive of a proposed 820m<sup>2</sup> stratum lot beneath Keira Street road reserve).

The BBC report however fails to provide sufficient evidence as to the breakdown in gross floor areas for specific land use components in the development in order to demonstrate as to whether the proposal accords with the specific mixed use development FSR formula contained in sub-clause 22(4) of WCCLEP 2007 for mixed use type developments in Business zones (including the Commercial Core zone in which the subject site is located within). This is critical to determine as to whether or not the proposed 5.19:1 FSR for the development in its current form, is consistent with sub-clause 22(4) of WCC LEP 2007.

Further, the BBC report argues that the new LEP fails to deliver any practical benefit in development even though the FSR has increased from 3.5:1 up to 6:1 since the new LEP includes common arcades, malls, thoroughfares and the like in the calculation of gross floor area. However, the proposal at this stage is not supported by a breakdown in gross floor area for each floor or component in the development to determine the validity of this argument.

The BBC report also argues that the non-compliance with the West Keira site arises when the commercial office and residential towers are added and the non-compliance is a direct consequence of the required inclusion in the calculation of gross floor area of common horizontal circulation areas and of above-ground carparking areas.

In light of the above, it is recommended that the Department not support any significant variation to FSR mix given the applicant can physically amend the proposal by way of deleting the above – ground parking and constructing additional basement parking levels below the West Keira Street shopping centre site. This would enable the applicant to gain additional retail floorspace whilst providing for additional carparking commensurate with the carparking requirements of WCCLEP 2007 & WCC DCP 2007.

6. The BBC report indicates that the redevelopment and expansion of Wollongong Crown Central will result in total gross floor area of 32,138m<sup>2</sup> of retail floorspace and a total of 650 carparking spaces proposed (ie 49 additional carparking spaces) within the existing

eastern Crown Central precinct and an additional 796 carparking spaces on the West Keira Street site. This will result in a total parking allocation of 1,446 carspaces.

The provisions of clause 22C(1) of WCCLEP 2007 prescribe the provision of carparking at a rate of 1 parking space per 25m<sup>2</sup> of retail floorspace. Based upon the BBC report, the proposed upgrading of Wollongong Crown Central shopping centre (Stage 1) requires the provision of 1,285 carparking spaces.

However, the calculations for the gross floor area of the proposed redevelopment and expansion of Wollongong Crown Central shopping centre as per the BBC report fail to include common arcade, mall and thoroughfare areas, stairs, lifts, escalators, amenities and the like, which are now included in the gross floor area definition as calculated floorspace.

Further, there is a lack of detail concerning the number of seats within the cinema complex which is subject to a separate carparking rate of 1 parking space per 5m<sup>2</sup> of gross floor area or 1 space per 4 seats.

Notwithstanding this, Council staff have tried to undertake a preliminary assessment of the car parking requirements for the proposed development, based on the present data available. In this respect, the proposed expansion of Wollongong Crown Central shopping centre & proposed cinema complex will require as an absolute minimum the following carparking spaces:-

Level 2 - 21,921sq.m = 879 parking spaces

Level 3 - 17,687sq.m = 708 parking spaces

Level 4 - 10,967sq.m = 439 parking spaces

Cinema 1 & 2 = 144 seats (72 each cinema)

Cinema 3 = 217 seats

Cinema 4, 5 & 6 = 240 seats (80 seats each cinema)

Cinema 7 & 8 = 40 seats (20 seats each in gold class)

TOTAL - 641 seats = 161 car spaces plus 7 motor cycle space plus 13 additional spaces for the box office area.

This equates to a total carparking requirement for the expansion of the Crown Central shopping centre & new cinema complex of 2,207 car parking spaces (excluding any parking for the commercial office building or the units in the residential apartment building).

As per above, the proposed expansion of Stage 1 Crown Central shopping centre & new cinema complex makes provision for only 1,446 car spaces. Therefore, the Stage 1 retail & cinema complex component will have a parking shortfall of 761 parking spaces with a corresponding variation in the order of 35%

A review of major Sydney shopping centres and local sub-regional shopping centres in Wollongong Local Government Area (LGA) has been undertaken to provide a comparative analysis in terms of car parking in relation to shopping centre size. This is highlighted in below:-

#### Local Sub-Regional Shopping Centres in Wollongong LGA

Westfield Figtree - 98 Shops -1,000 car spaces  
Westfield Warrawong - 150 Shops - 2,000 car spaces  
Dapto Mall (refurbishment under construction) 28,081sq.m - 1,049 car spaces

Major Sydney Shopping Centres

Penrith Plaza (Westfield) - 85,000sq.m - 3,600 car spaces  
Miranda Westfield - 110,00sq.m 4,500 car spaces  
Parramatta Westfield - 128,000sq.m - 4,300 car spaces  
Blacktown Westpoint - 100,000sq.m - 4,800 car spaces

In light of the above, it is evident that the proposed expansion of the Wollongong Crown Central shopping centre should provide in the order of 2000+ carspaces for stage 1.

Further, Council has not been in a position at this stage to assess the carparking requirement for the West Keira Street site, given the current level of information available on the commercial office and residential towers.

Accordingly, the total gross floor area of the commercial office building and the breakdown in the number and mix of units in the residential apartment tower is required to enable further assessment of the total car parking requirement for the overall mixed use development, given that the provision of any additional basement carparking levels must be required upfront at Stage 1 in the development. No additional aboveground parking is recommended given this will only further add to the parking complications.

In light of the above, it is recommended that the Department consider seeking a major redesign of the proposed development by way of additional basement carparking levels upon the western precinct of the development site, in order to resolve the parking shortfall.

Alternatively, the Department may wish to negotiate with the applicant (GPT) for the creation of a formal Planning Agreement with the Department and Council (ie to be lodged in conjunction with the Part 3A Development Application) pursuant to the provisions of 93F of the Environmental Planning & Assessment Act 1979. This Planning Agreement would either involve a monetary contribution towards the acquisition and / or construction of a carpark within the city centre, in lieu of the on-site parking shortfall.

7. The proposed redevelopment of the Wollongong Crown Central shopping centre appears to remain inward focussed and fails to provide adequate street frontage activation along the main pedestrian frontages such as Keira Street, Church & Market Street.

The site is situated within a B3 Commercial Core Zone. One of main objectives in the B3 Commercial Core zone is to create opportunities to improve public domain and pedestrian links throughout the city centre.

Further, clause 29A of WCC LEP 2007 states that for land situated in Zone B3, consent should not be given if development would result in any part of the ground floor not being used for commercial activities that have active street frontages.

The provisions of WCC DCP 2007 state that the site is located within the city core which focuses on high quality streetscapes, public art, outdoor eating and attractive public spaces. The primary focus of the city core is Crown Street Mall. This area is characterised by street enclosing buildings forming continuous building facades that will provide an active street frontage to all commercial core streets.

In terms of building form, the key objectives are:

- Provide a strong definition of public domain
- Define the public street with good physical and visual connections between buildings to the street.
- Achieve active street frontages with good physical and visual connections
- Ensure there is consistency in the main street frontages of buildings having common alignment
- Provide for pedestrian comfort and protection from weather conditions
- Define the public street to provide spaces that are clear in terms of public accessibility and safety, and are easy to maintain;
- Provide for high quality landscape to contribute to the amenity of the city core

Other relevant matters include in the DCP include:

- Locate active uses such as shop fronts closer to pedestrian areas
- Create good quality entry spaces to entrances
- Maintain sun access to public domain
- Streets are to have continuous awning to give weather protection to concentrated pedestrian street activity.

All specialty shops located at ground floor should have individual entrances to the street to promote pedestrian activity especially along Crown Lane and Crown Street Mall. Entrances from Keira Street should be provided to the Mini Major department store which also provides access to the major department store. Specialty shops should be continuous along street frontages. Improvements can be made in providing street access from Crown Lane to the specialty shops to open up the lane and make it more usable as it is currently underutilised with vandalism and loitering of people.

The main hub of activity will be the intersection of Crown and Keira Street with high pedestrian activity. Continuous awning cover should be provided with appropriate street furniture. The corner of Crown and Keira Streets is the main focal point and architectural elements should be used to reinforce this significance.

The Church Street elevation does not create any visual interest with the bland facades and limited street activity. Safer by design principles should be applied to this frontage as it will be heavily used at night due to the location of the cinemas. This may involve lighting, security cameras, increased entrances for surveillance and appropriate location of landscaping so as to not create 'hiding spots'.

The lack of street activity on Keira Street is a concern especially after hours where there is no opportunity for specialty shops/cafes/restaurants along this frontage. Consideration should be given to enhancing Keira Street into the active night time restaurant strip in which Keira Street is transforming into.

Accordingly, it is recommended that the Department request GPT to provide additional street frontage activation for Crown Lane, Keira Street, Church Street & Market Street in line with the requirements of WCC LEP 2007 & WCC DCP 2007, as part of the final DA architectural design drawings.

8. The proposed pedestrian overbridge above Keira Street (linking the eastern Crown Central shopping centre with the western Keira Street retail podium) is required to incorporate a minimum 5.8 metre clearance height above the road carriageway to ensure buses and other heavy vehicles are able to continue to travel along Keira Street. The 5.8 metre clearance height requirement is requested to be reflected on Development Application elevation and sectional plans together with appropriate RLs.
9. The proposed pedestrian overbridge & the retail tunnel underneath the existing Keira Street road reserve will necessitate the lodgement of a stratum subdivision plan which shows the exact stratum for each component in the development. The stratum subdivision plan is required to be prepared by a registered surveyor and shall be accompanied by appropriate supporting documentation including a 88B written instrument, sectional / cross sectional plans and such documents which clearly identify the dimensions / depth of each stratum lot in the subdivision. The stratum subdivision and supporting documentation must specifically take into account the depth of all infrastructure / utility services in the Keira Street road reserve and shall guarantee that all such infrastructure / utility services remain in the proposed Keira Street public road stratum lot.
10. The preparation of full structural design details for the tunnel (ie underneath the proposed Keira Street public road stratum lot) is required for the submission to and approval of Council. The structural design details of the tunnel are required to be fully certified by a suitably qualified and experienced structural engineer. The structural design details must prove that the structural integrity of the Keira Street road carriageway & all associated infrastructure / utility services contained within the road reserve will be maintained at all times. The structural design details of the tunnel shall also guarantee that the Keira Street road carriageway is capable of maintaining continuous heavy vehicular traffic movements along this portion of Keira Street. The submission of documentary evidence from Council and each relevant infrastructure / utility service provider is also recommended in order to determine that their minimum clearances in relation to the tunnel are catered for in the design as well as future access requirements for any future road maintenance work, stormwater maintenance work and / or replacement or servicing of infrastructure by the various service providers.
11. The preparation of drainage concept plans and associated calculations for the development by a suitably qualified and experienced civil engineer. As part of the preparation of the final drainage concept plans, it is necessary for a review to be undertaken as to the adequacy of the existing stormwater drainage system and whether upgrading is necessary to meet the future stormwater drainage requirements in the locality of the development site. The review of the existing stormwater drainage system shall specifically include Keira Street, Crown Street and Crown Lane given the proposed tunnel beneath the Keira Street road reserve.
12. All awning structures around the external façade of the development shall be setback a minimum of 600 millimetres off any road kerb line for all roads surrounding the

development site, in order to provide sufficient clearances for heavy vehicles such as trucks and buses. This requirement is requested to be reflected on the DA architectural site plan, floor layout plans and elevational plans (where relevant) for the development.

13. The proposed retail tunnel is recommended to incorporate a full length (1:20) pedestrian ramp or a lift designed in accordance with Australian Standard AS 1428.1 - Access and Mobility Guidelines together with the proposed escalators and stairs in order to provide equal access opportunities for all patrons and staff in the proposed development. This requirement is requested to be reflected on the DA architectural floor layout and section plans.
14. The proposed 'piazza' area at the intersection between Crown Lane & Crown Street requires further detail to clarify as to whether it is proposed to be a pedestrian walkway only or is to be an active public domain space in which outdoor seating is proposed.
15. The proposed realignment of the eastern end of Crown Lane relies upon the demolition of No.228 Crown Street on Lot 1, DP 154592 in order to remove the existing acute angled intersection with Crown Street. This will require dedication of this land for inclusion as road reserve in Crown Street and be free of cost to Council. Further, the proposed partial road closure of Crown Lane & Richardson Street will also require formal road closure by Council under the Roads Act 1993.

Accordingly, it is recommended that the applicant (GPT) be advised to further liaise with Council's Property Division in respect to the formal road closure procedures as well as the proposed stratum subdivision and associated lease agreement for the airspace rights above Keira Street for the pedestrian overhead and the stratum lot below Keira Street for the retail tunnel.

Note: In the event that the Minister for Planning ultimately supports the proposed development and wishes to grant consent to the development prior to the formal road closure and Keira Street stratum subdivision procedures and associated airspace right lease agreements being finalised, it is recommended that a "Deferred Commencement" consent be imposed requiring these aspects to be completed to the satisfaction of the Minister for Planning and Council, prior to the consent becoming operative.

16. The preparation of a comprehensive retail impact assessment report as part of the Statement of Environmental Effects which addresses the proposal's relationship / potential impact upon existing and planned retail and commercial office centres in Wollongong Local Government Area, including direct impacts upon the Wollongong City Centre. The retail impact assessment is required to specifically address Wollongong City Centre Local Environmental Plan 2007, relevant Land & Environment Court case law (eg *Fabcot Pty Ltd v Hawkesbury City Council NSW LEC 2, 10 April 1997*) and the range of previous studies undertaken by over the last 10 years for the Wollongong City Centre, including the following studies:-
  - (i) Wollongong CBD Retail Study (November 1997) – prepared by Leyshon Consulting Pty Ltd on behalf of Wollongong City Centre Ltd;
  - (ii) Retail Overview Report – Wollongong City Centre / Crown Street Mall (June 2002) – prepared by Leyshon Consulting Pty Ltd on behalf of Wollongong City Centre Management;
  - (iii) Overview of Wollongong Region Economy Report (June 2002) – prepared by Leyshon Consulting Pty Ltd on behalf of Wollongong City Council;

- (iv) Illawarra and South Coast Retail Centres Study February 2004 – prepared by HillPDA on behalf of the NSW Department of Infrastructure Planning and Natural Resources;
  - (v) Wollongong Retail Centre Study (September 2004) – prepared by HillPDA on Behalf of Wollongong City Council’s Strategic Planning Division; and
  - (vi) Retail and Commercial Centre Impact Assessment and Review Report – prepared by Patrick Partners Pty Ltd on behalf of Wollongong City Council.
17. The preparation of a comprehensive carparking and traffic impact assessment report is recommended to address the following issues / matters:-
- (i) Appropriate traffic analysis / modelling including but not necessarily limited to PARAMICS, TRACKS & SIDRA traffic modelling. The PARAMICS modelling shall examine the likely traffic generation impact of the proposed development on the surrounding road network (ie for both the existing and future period – Year 2016) in the form of input / output reports and video files. All key intersections in the surrounding road network shall be modelled using SIDRA analysis. Further, the outputs from the PARAMICS modelling should be analysed in SCATES for signalised co-ordinated junctions to determine the potential impact of the development;
  - (ii) Full details of the carparking facilities and access arrangements for both the total development and each respective stage in the development taking into account the carparking requirements contained in Wollongong City Centre LEP 2007, Wollongong City Centre DCP 2007 and Wollongong City Council DCP 49. This carparking assessment is recommended to be accompanied by a full breakdown of the proposed allocation of carparking spaces for each component in the development as well as identifying the proposed quantum and location of visitor parking associated with the residential apartment tower in the development;
  - (iii) Architectural drawings which show the full dimensions of the carparking areas and the proposed location of pay booths, boom gates and trolley storage areas as well as the proposed truck loading / unloading delivery areas etc;
  - (iv) Proposed truck routes to / from the site for the supermarket, discount department store and other major retail operators within the stage 1 component and other deliveries in the staged development, especially truck routes in the immediate locality;
  - (v) Details of the proposed truck delivery service areas and access arrangements together with truck turning templates on the architectural plans is required in order to determine the physical capability or constraints associated with servicing either of the two separate buildings in the staged development. This requirement must take into account existing road conditions and road signage restrictions applying to specific zones in the immediate locality;
  - (vi) The report is also required to identify what additional road improvement and / or upgrading works are required to key intersections or roads in the locality, as a result of the PARAMICS & SIDRA analysis;
  - (vii) Proposed security access arrangements into / from the various proposed carparking areas in the overall development;

- (viii) Provision for shopping trolleys within the various carparking levels in the development;
  - (ix) Provision for suitable bicycle storage areas and change rooms / showers within the overall development; and
  - (x) Detailed road upgrading and / or road improvement design plans (including survey reports identifying the location and depth of existing infrastructure / utility services within the road reserves) required to cater for the development, including proposed pedestrian threshold treatments for key locations including the pedestrian crossing on Keira Street between the eastern and western buildings in the development.
18. The provision of electronic parking vacancy signs is recommended at each carpark entry point, in order to minimise potential additional traffic generation impacts within the development and upon the surrounding road network arising from patrons having to access different carparking areas in the development in endeavour to find a vacant carparking space. This requirement is recommended to be reflected on architectural drawings as part of the DA documentation.
19. The preparation of a public transport management plan is recommended which makes provision for a possible bus shuttle operating in a loop around the city centre as well as additional bus transport routes to / from the centre particularly along Market Street to improve accessibility to the eastern end of the Wollongong Crown Central shopping centre complex, especially for night-time periods where patrons may wish to attend the cinema complex. This will necessitate liaison with the local bus company operators and Council's Traffic Section & Community & Cultural Services Division.
20. The redesign of the eastern Crown Central shopping centre is recommended to make provision for a pedestrian link within the centre between Crown Street (mall) and Market Square as per the pedestrian linkage requirements contained in Figure 3.1 in WCC DCP 2007 down towards MacCabe Park. This pedestrian access link requirement may include an enclosed or open arcade and should be reflected on the site plan, floor layout plans & elevation plans.
21. The preparation of a detailed site contamination report is recommended to be required upfront prior to the granting of development consent. This report is requested to include the following aspects:-
- (i) Identification of the exact location, nature and degree of any contamination within the soil strata and / or the groundwater table, where relevant;
  - (ii) Detailed soil sampling and NATA laboratory testing – The site shall be tested and analysed for a range of potential contaminants, including (but not necessarily limited to) the following:- (i) heavy metals – arsenic (As), cadmium (Cd), copper (Cu), mercury (Hg), lead (Pb), nickel (Ni) and zinc (Zn) (ii) Total Petroleum Hydrocarbons (TPH / BTEX) including benzene, toluene, ethyl benzene and xylenes (iii) Polyaromatic hydrocarbons (PAHs) including benzopyrene, organochlorine pesticides (OC), organophosphorus pesticides (OP) and polychlorinated biphenyls; and

- (iii) Proposed remediation strategies / measures to be implemented for the remediation of any contaminants found within existing underground storage tanks, the soil strata and groundwater table as well as the proposed remediation strategy to be employed for the excavation of the Council road reserve in Crown Street, in order to determine as whether any such underground storage tanks exist in the road reserve. The remediation action plan shall also address what strategies will be employed for the removal of any identified underground storage tanks within Council's road reserve.

Note:- The site contamination assessment report is recommended to comply with the requirements of State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55) & the associated SEPP 55 Managing Land Contamination: Planning Guidelines, Contaminated Land Management Act 199, Contaminated Sites: Guidelines for Consultants Reporting on Contaminated Sites, Contaminated Sites: Sampling Design Guidelines and Contaminated Sites: Guidelines for Assessing Service Station Sites and any other relevant best practice documents.

- 22. The preparation of a comprehensive geotechnical investigation report (as an addendum report to the Statement of Environmental Effects) which identifies a range of matters including but not necessarily limited to the following:-
  - (i) Geotechnical conditions of the underlying rock stratum;
  - (ii) Recommended strategies / measures required to be imposed (ie in the event that the proposal is ultimately supported by the Minister for Planning) for the excavation of the site and the construction of the development including the proposed lower level retail area underneath Keira Street and the basement carparking areas. The report is specifically requested to recommend specific excavation techniques / technology which will minimise any adverse noise and / or amenity impacts upon surrounding land uses in the immediate locality, whilst still providing a cost-effective and efficient excavation method;
  - (iii) Recommended geotechnical testing requirements; and
  - (iv) Required level of geotechnical supervision for each part of the works as defined under AS 3798 – Guidelines on Earthworks for Commercial and Residential Developments.
- 23. The submission of architectural drawings (ie at a 1:500 scale) including a site plan, floor layout plans for the basement carparking areas and the various mixed use retail, commercial office and residential floors, elevational and section plans and other supporting documentation (as referred to in Schedule 1 of the Environmental Planning & Assessment Regulation 2000) including a sample board of proposed external building materials and colours and detailed photomontages are requested which show the proposed external treatment finishes and streetscape appearance of the buildings in the development. Additionally, landscape design plans are also requested which show the proposed landscape treatment for the public domain areas within Council's road reserves / footpaths in line with Council's landscaping design requirements for public domain areas in the Wollongong City Centre. The preparation of a model at a suitable scale (eg 1:500 scale) may also be of assistance during the formal public exhibition / community engagement process.

24. Council has adopted a policy as part of the Wollongong City Centre revitalisation program whereby detailed 3D CAD models are required for developments within the Wollongong City Centre boundaries. The policy requires the lodgement of detailed 3D CAD models to Council for the insertion and visualisation into the Wollongong City Centre model together with the prescribed fee of \$1,000.00 to cover the costs associated with inputting of the data into the model. The 3D CAD model is at a scale of 1:1.
25. The preparation of a Crime Prevention through Environmental Design (CPTED) and a Safer by Design assessment report is recommended which deals with the range of issues addressed in Crime Prevention through Environmental Design (CPTED) and Safer by Design guidelines, including but not limited to the following matters:-
- (i) Natural surveillance – crime and anti-social behaviour is less likely to occur if the target area is within sight of the general public;
  - (ii) Access control – creating a built environment that it more difficult in which to commit crime or anti-social behaviour eg lighting, active street frontages, restricted access areas;
  - (iii) Territorial reinforcement – defining public versus private space;
  - (iv) Avoidance of unrestricted access areas such as alley ways to back of house (BOH) areas;
  - (v) Avoidance of external wall materials and treatments that readily encourage graffiti;
  - (vi) Improved lighting and white wall painting of carparking levels, in order to improve safety within carparking areas;
  - (vii) Maintenance schedules which provide rapid response times for the removal of graffiti and repairs to broken windows and lights etc.
26. The submission of a preliminary traffic management plan report which deals with proposed traffic management plan and staging program for any proposed works within road reserves in the surrounding road network, including the proposed retail tunnel below Keira Street.
27. The submission of shadow diagrams for hourly intervals between 9.00 am to 3.00 pm for the 21 June winter solstice period. The shadow diagrams should also be supported by appropriate written advice in the required SEE outlining the proposal's overshadowing impact upon surrounding land uses and its relationship with relevant development standards / requirements contained in WCC LEP 2007 & WCC DCP 2007.
28. The preparation of a wind impact assessment report for the development is required which deals with the likely wind effects / impacts on the surrounding public domain as a result of the proposed development, especially the commercial office and residential tower components in the development. The maximum wind criteria shall be 10 metres / second for this retail locality as per clause 5.4 in WCC DCP 2007. The wind impact assessment report should also address what additional building features / design measures are recommended to be incorporated into any final design of the development, in order to minimise any adverse wind effects upon the public domain areas, within the immediate locality of the development site.
29. The preparation of a waste and recycling management plan (ie prepared by a specialist waste consultant) is required which addresses best practice recycling and re-use strategies / measures, including but not necessarily limited to the following matters:-

- (i) Proposed recycling and / or re-use strategies for demolition and construction materials;
  - (ii) Use of sustainable building materials that can be reused or recycled at the end of their life;
  - (iii) Proposed handling methods and location of waste storage areas;
  - (iv) Proposed procedures for the handling of any contaminated or medical waste; and
  - (v) Procedures for the on-going sustainable management of putrescible waste, glass, boxes and other packaging materials, including estimated volumes, required bin capacities and on-site waste and recycling storage requirements.
30. The preparation of a heritage impact assessment report by a suitably qualified and experienced heritage consultant which addresses the proposal's relationship and any potential impact with any existing heritage item within the surrounding locality as identified in Schedule 5 of WCC LEP 2007, including but not necessarily limited to:-
- (i) St Michaels Anglican Cathedral / Church at Market Square, Wollongong;
  - (ii) Market Square conservation area, Wollongong;
  - (iii) Regent Cinema at 197 Regent Street, Wollongong;
  - (iv) Wollongong Congregational Church, 33 Market Street, Wollongong;
  - (v) Wollongong Courthouse, Market Square, Wollongong;
  - (vi) Other shops / buildings along Crown Street as per Schedule 5;
  - (vii) Other shops / buildings along Keira Street as per Schedule 5.
31. The Public Domain Technical Manual issue A November 2006 ( in development) identifies Crown and Keira Streets as City Core Streets and Market St and Crown Lane as Civic Streets.
- Both areas would require a high quality pavement finish. A raven black dark grey granite pavement is nominated with exfoliated finish. Pavement size is 600 x 300 x 40mm in staggered bond with working slab. A nominal 2%, minimum 1%, maximum 2.5% crossfall is required from property boundary to back of kerb to comply with AS 1428 and achieve positive drainage.
- Pavement slope is a major issue as liberties can be taken to meet building entries and the cross fall can be difficult for wheel chair users.
32. The development will require the provision of street tree planting around the perimeter of the site. The street tree species adopted for the Commercial Core are restricted to 5 species only, namely:-  
*Araucaria cookii*, *Livistona australis*, *Fraxinus griffithii*, *Platanus x hybrida* and *Ulmus parvifolia*.  
 The *Ulmus parvifolia* (Chinese Elm) tree species is considered the most appropriate and is thriving relatively well, near the amphitheatre in mall. Accordingly, the preparation of a detailed landscape design plan is required which shows the proposed landscaping treatment to the public domain including the provision of the nominated tree species at a interval spacing of every 10 metres. The detailed landscape plan shall also incorporate tree guards and grate systems around the trunk of the street trees.
33. The Wollongong City Centre Civic Improvement Plan 2007 (WCC CIP 2007) identifies a range of public domain projects / strategies to be pursued in order to revitalise the Wollongong City Centre, namely:-

- (i) Public Art Strategy

Public art is encouraged in the streets of the public domain and may include some form of freestanding objects, the layout of public spaces, elements such as paving design and street furniture. Therefore, the Department is requested to seek advice from GPT as to whether any possible public art may be provided as part of the project.

(ii) Paving Strategy

The paving design is identified as Type 1 City Core Street- Fully paved, high quality finish.

In this respect, the required paving treatment for the public domain in this locality is of a raven black / dark grey granite pavement type with an exfoliated finish. The required pavement size is 600 mm x 300 mm x 40mm in a staggered bond with working slab. A nominal 2%, minimum 1% and maximum 2.5% crossfall is required from the property boundary to back of kerb to comply with AS 1428 and in order to achieve positive drainage off the footway areas.

This requirement is requested to be reflected on appropriate public domain plans at a detailed 1:50 scale.

(iii) Tree Planting

Details on the type of trees are not as yet specified. However, as per 32 above, detailed landscape plans are requested to be provided which show the proposed street tree planting upon the road reserve / public domain areas surrounding the development.

(iv) Lighting Strategy

The Lighting Strategy in the Wollongong City Centre Civic Improvement Plan 2007 indicates that under awning lighting is required for developments with facades fronting Crown Street, Keira Street, Market Street, Church Street and Regent Street. Additionally, pedestrian pole lighting Details of the proposed type and placement of street lighting is requested as part of the DA documentation.

(v) Urban Furniture

Details of any proposed street furniture within the public domain surrounding the shopping centre are requested to be provided at a detailed 1:50 scale.

34. Consultation with the following statutory authorities / government departments / organisations to ascertain their requirements is also recommended:-

- (i) NSW Fire Brigades;
- (ii) Sydney Water Corporation;
- (iii) Telstra Corporation;
- (iv) Integral Energy;
- (v) NSW Roads & Traffic Authority;
- (vi) NSW Ambulance Service;
- (vii) NSW Department of Environment & Conservation;
- (viii) NSW Police Service;
- (ix) NSW Department of Transport; and
- (x) Local bus & taxi service providers.

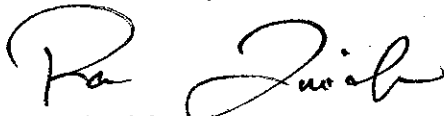
It should be noted that Council is supportive in-principle with the major redevelopment and expansion of Wollongong Crown Central shopping centre since this project will strengthen the retail hierarchy of the city centre and reinforce Wollongong City Centre as the regional city in the Illawarra. The project is also likely to help revitalise the city centre, especially Crown Street West and hence, Council is willing to work with the Department and GPT in respect to this project.

Council appreciates the opportunity to provide the Department with advice on the recommended key issues to be addressed for this Part 3A project.

However, given the tight timeframe to review this proposal and to provide detailed written advice on recommended key issues to be addressed as part of the Development Application documentation, Council reserves its right to provide further written comments to the Minister for Planning and Department, upon receipt of the Development Application and accompanying documentation.

Should you have any enquiries or wish to organise a meeting to discuss any issues arising in this correspondence, please do not hesitate to contact me on 4227 7639, during office hours.

Yours faithfully



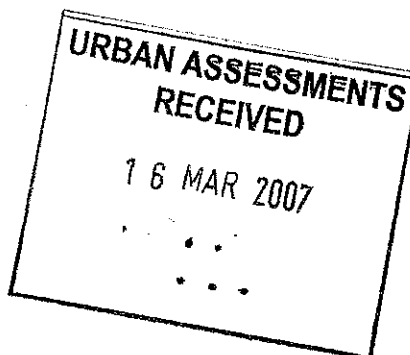
Ron Zwicker  
Development Manager East  
**Wollongong City Council**



Our Ref: 497DA228

Contact: Nicole Stevenson (4221 2523)

Your Ref: MP 06\_0209



14 MAR 2007

Major Development Assessment  
Department of Planning  
Urban and Coastal Assessments  
GPO Box 39  
SYDNEY 2001  
Att: Aaron Sutherland

**CITY OF WOLLONGONG – MP 06\_0209, KEIRA STREET WOLLONGONG, PROPOSED MIXED USE DEVELOPMENT INCLUDING RETAIL, CINEMA COMPLEX AND ASSOCIATED BRIDGE AND TUNNEL INFRASTRUCTURE, WOLLONGONG.**

Dear Sir

I refer to your letter received on 2 March 2007 requesting details of key issues and assessment requirements for the subject development proposal.

The RTA has reviewed the information provided and offers the following preliminary comments for your consideration:

- The proposal should be developed in the context of the Wollongong City Centre Revitalisation Plan.
- A Traffic Impact Study, examining potential impacts of the development should be submitted with the application for RTA and Council consideration. The traffic impact study (TIS) should be prepared in accordance with Table 2.1 of the *RTA Guide to Traffic Generating Developments*. The traffic impact study and all subsequent modelling should consider the cumulative impact of the development on the road network.

**NB:** It should be noted that the traffic generation rate determined for the site should be based on values contained within the RTA Guide to Traffic Generating Developments. Should a particular use not be contained within this guideline, then surveys of similar use developments within a similar regional area, preferably the Illawarra should be undertaken to provide an estimate of the traffic generation of these uses.

- Network modelling must be undertaken to assess the impact of the proposal on the existing network. The applicant should utilise the Wollongong City Centre Paramics Model to examine the impact of the development on the road network. The applicant should be required to model the following PM Peak Scenarios:
  - Base scenario

Roads and Traffic Authority



Level 4, 90 Crown Street  
Wollongong NSW 2500

PO Box 477 Wollongong NSW 2500  
DX51 78 Wollongong

T 02 4221 2460

www.rta.nsw.gov.au

- Base with development
- 10 year projection
- 10 year projection with development

**NB: Electronic copies of the Paramics data files for each scenario and a calibration and validation report must be submitted for evaluation.**

- In addition to the above network modelling, intersection modelling using aaSIDRA will be required to examine the impact of the development on key junctions within the area.

The applicant should be required to model the following PM Peak Scenarios in SIDRA:

- Base scenario
- Base with development
- 10 year projection
- 10 year projection with development

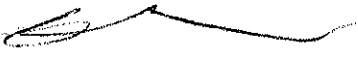
**NB: Electronic copies of the input and output files, movement summaries and queue lengths must be submitted for evaluation. In addition, where possible SIDRA analysis should be undertaken using SIDRA 3.**

- The applicant should identify suitable treatments required to ameliorate any traffic and safety impacts associated with the development. This should include an examination and identification of pedestrian/cyclist desire lines, consideration of alternative modes of transportation, including public transport, an examination of the accident history within the area and the identification of any additional infrastructure required to address these matters.
- The applicant should submit a construction management plan with the development application to indicate staging of all works associated with the proposal and indicate relevant management systems designed to minimise the impact of construction activities on pedestrian safety and traffic efficiency. This is particularly relevant for the bridge and tunnel works proposed for Keira Street.
- Turning movement diagrams in accordance with AUSTROADS Standards should be submitted to demonstrate the turning movements of heavy vehicles at key intersections along the heavy vehicle route. This is required for both construction and operation stages of the development. In particular, turning movements at the intersection of Market Street and Keira Street and within Richardson Lane should be submitted for review.
- The RTA requests that the developer consider the environmental impacts of any proposed roadworks as part of a Statement of Environmental Effects. If these impacts are not considered, then the RTA would require the applicant to provide a separate environmental impact assessment, a 'Review of Environmental Factors' prior to commencing any works that were conditioned as requirements of the development.

**Note:** The RTA has a responsibility to ensure that all environmental impacts are considered to the fullest extent possible under Section 111 of the Environmental Planning and Assessment Act.

Should you require any clarification on this matter please contact Nicole Stevenson on 4221 2523.

Yours faithfully



Trish McClure  
Manager, Road Safety and Traffic Management  
Southern Operations and Services

15 March 2007

Heather Warton  
Director, Urban & Coastal Assessments  
Department of Planning  
GPO BOX 39  
SYDNEY NSW 2001

File Ref No: 2002/03116F-08

Attention: Aaron Sutherland

Dear Heather,

**Re: MP 06\_0209 Concept Plan and Project Application for GPT site known as 'Wollongong Central Shopping Centre', Crown and Keira Streets, Wollongong.**

I refer to your letter dated 2 March 2007 inviting Sydney Water to comment on the proposed concept plan and project application for the Wollongong Central Site for GPT located at Crown and Keira Streets, Wollongong. Sydney Water has reviewed the information provided for this proposal, and provides the following comments for the Department's consideration.

**Water and Wastewater Services**

A redevelopment proposal was submitted to Sydney Water on 26/6/06 [Case No. 103454]. The assessment was provided to the applicant Hyder Consulting in August of 2006. The development site is currently serviced by both water and wastewater services that are adequate to supply the proposed future development of the site.

If during detailed design phases of the project, it is identified that adjustments to the sewer in Keira St are needed to accommodate the proposed tunnel, then further negotiations with the developer will be required. The development would need to adhere to the guidelines for building over/adjacent to Sydney Water Assets.

**Section 73 Compliance Certificates**

The developer will be required to obtain a Section 73 Compliance Certificate from Sydney Water. Issuing of the Certificate will confirm that the developer has met Sydney Water's detailed requirements, which include:

- Correctly sized water and wastewater mains; extensions or amplifications to existing water and wastewater systems (if necessary);
- Building over/ adjacent to Sydney Water's existing water, sewerage or stormwater infrastructure;
- Payment of Sydney Water charges; and
- The completion of any other requirements.

The developer will be responsible for funding any adjustments to Sydney Water infrastructure resulting from the development. Developers are advised to engage the services of a Water Servicing Coordinator (WSC) to obtain a Section 73 Certificate and manage the servicing aspects of their projects. Details are available from any Sydney Water Customer Centre on 13 20 92 or Sydney Water's website at [www.sydneywater.com.au](http://www.sydneywater.com.au)

**Trade Waste**

All industrial and commercial customers discharging trade waste into Sydney Water's wastewater systems must obtain written permission from Sydney Water. The trade waste requirements help ensure Sydney Water can discharge or reuse wastewater in a way that protects the environment and complies with regulatory requirements. Depending upon the type of business and trade waste, Sydney Water will issue a trade waste permit or enter into a trade waste agreement.

A trade waste permit to discharge must be obtained before discharge into the sewer can commence. A trade waste permit will also be required for site remediation purposes. The application for a trade waste permit can be made to Sydney Water at the Section 73 Certificate application stage. The applicant can contact the Sydney Water Customer Information Centre on 13 20 92 or Sydney Water's website at [www.sydneywater.com.au](http://www.sydneywater.com.au).

**Fire Fighting Capacity**

Sydney Water does not consider the fire fighting capacity of the mains as part of the Section 73 Certificate application process. Assessment of fire-fighting capability is the responsibility of the applicant. Sydney Water's role is limited to indicating modelled pressures at flows nominated by the applicant. Consideration must also be given to the fire fighting capability of surrounding developments. The applicant must ensure that the general water demand of the proposed development does not adversely impact the fire fighting capability of surrounding areas.

**General Comments**

In acknowledgment of the large size of the development, an opportunity is present for recycled water use within the site with uses such as toilet flushing and irrigation. In addition, there is the opportunity for storm water capture and reuse on nearby parklands. Sydney Water encourages the conservation and reuse of water where possible. For additional information, please refer to the Sydney Water website; [www.sydneywater.com.au](http://www.sydneywater.com.au).

If you have any queries or require further information, please contact Dean Hosking of the Urban Growth Branch on 02 9350 6207 or e-mail [dean.hosking@sydneywater.com.au](mailto:dean.hosking@sydneywater.com.au)

Yours sincerely



**Andrew Jackson**  
Manager, Strategic Market Analysis