

Ms Ingrid Berzins  
Department of Planning and Environment  
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**WCC REFERENCE**

**DE-2022/86**

Date

26 August 2022

Dear Ms Berzins,

**RESPONSE TO PUBLIC EXHIBITION OF SSD-30240120**

<b>Development</b>	Wollongong Private Hospital Expansion - State Significant Development – Public Exhibition - (SSD-30240120)
<b>Location</b>	15, 17, 19 and 21 Urunga Parade and 360, 366 and 368 Crown Street, Wollongong Lot D DP402234, Lot 47 DP5507, Lot 9 DP5507, Lot CP and 1-4 SP73256 and Lot A DP343680, Lots 1 & Lot 2 DP1212956 and Lot B DP34368 Wollongong Private Hospital 362 Crown Street WOLLONGONG NSW 2500

Thank you for the opportunity to comment on the development.

Wollongong City Council wishes to object to the application in its current form, for the following reasons:

1. Property description

- a) To Council's knowledge, the registered stratum subdivision of the existing private hospital building is still in effect. Lot 1 DP 1212956 contains the private hospital functions and Lot 2 DP 1212956 contains primarily non-hospital uses. The Statement of Environmental Effects (SEE) refers only to Lot 2 as being within the site, which appears an error.

2. Relationship with existing consents has not been clarified

- a) The stratum subdivision of the existing hospital building was approved under DA-2014/1431, and the subdivision created Lots 1 and 2 DP 1212956. A number of restrictions and covenants govern access, parking and servicing for the two lots. It is unclear how the new floor area would relate to the existing lot restrictions and covenants.
- b) The level 6 plan shows 'new vertical extension to existing fire stair' in north-east corner of the existing hospital, however this was approved under development application DA-2021/1028.

3. Wollongong Local Environmental Plan 2009

- a) Non-compliance clause 4.3 Height of Buildings
  - i. Proposed height 35m exceeds maximum permitted height 32m.
  - ii. The Visual Impact Assessment Report by Hatch RobertsDay should have included the impact when viewed from Beatson Park on Crown Street Wollongong (Lots 1 & 2 DP 1115021), as this is a heritage-listed public park

with seating in close proximity to the site. It is expected that the proposed height exceedance will be apparent from this location.

b) Non-compliance clause 4.4A Floor Space Ratio – Wollongong City Centre

- i. The SEE and clause 4.6 request refers to a percentage variation of 12% (based on a proposed FSR of 3.63:1) which is incorrect. A floor space ratio (FSR) of 3.63:1 is 21% over the standard. The addition of surplus parking results in a development seeking a 25% variation to the standard (see below).
- ii. The Transport and Accessibility Impact Assessment by Traffix refers to the Wollongong Development Control Plan 2009 requiring 382.5 (383) car parking spaces for the combined existing and proposed floor area. The development provides 465 car parking spaces.

Wollongong Local Environmental Plan 2009 defines gross floor area as excluding ‘...car parking to meet any requirements of the consent authority (including access to that car parking)’. Car parking in excess of the rates prescribed in WDCP 2009 contributes to gross floor area in accordance with the definition. However, the GFA Calculation Plan appears to exclude all parking from gross floor area (GFA).

Based on the Traffix report, the development provides 82 surplus parking spaces. Each space occupies approximately 13.75m<sup>2</sup> of GFA, and therefore the surplus parking adds approximately 1,127.5m<sup>2</sup> to the development. The total GFA for the purpose of FSR calculations is therefore 33075.5m<sup>2</sup>, which is an FSR of 3.75:1.

- iii. The expansion project involves acquisition of additional land, yet the Wollongong Private Hospital seeks to maintain a non-complying FSR. Expanding the site is an opportunity to provide a development which sits comfortably within the predominantly low scale residential setting and is within the parameters of the planning controls, yet the proponent has elected to again exceed the FSR control.

c) Clause 5.10 Heritage Conservation

- i. The demolition of 366 Crown Street Wollongong is not consistent with the objectives of the clause, which include:

*(a) to conserve the environmental heritage of Wollongong,*

*(b) to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,*

d) Clause 7.18 Design Excellence in Wollongong City Centre and at Key Sites

- i. The consent authority must be satisfied that the development demonstrates design excellence as detailed in the clause, prior to granting consent. Council is of the view that the recommendations of the State Design Review Panel have not been adequately resolved in the proposed plans. Any departure from a development standard should only be considered where design excellence can be demonstrated. The proposed built form which arises from the departures falls well short of acceptable urban design and design excellence standards at this time.

4. Lot Isolation

- a) The development leaves 370 Crown Street Wollongong sandwiched between the proposed development and Beatson Park, which is public land owned by Wollongong City Council. Opportunities to develop 370 Crown Street are limited by the proposed development.

## 5. Traffic and Parking

- a) The existing private hospital building has 3 basements. The hospital lot (Lot 1 DP 1212956) is situated on each basement floor. The hospital car parking is physically located in basement level 3 and additional basement parking located in Lot 2 is allocated to the hospital lot via a registered positive covenant. The traffic and parking assessment does not adequately discuss the stratum arrangements.
- b) Car parking should be allocated in accordance with Wollongong Development Control Plan 2009 (WDCP 2009) requirements for each activity/tenancy and this should be reflected in the application and on the 88b instrument.
- c) Movement
  - i. Lower ground floor plan – Vehicles accessing via Urunga Parade do not appear to have a place to drop off before entering a paid parking area. Will there be arrangements in place for free parking for a short period of time?
  - ii. Ground floor plan – The drop off area appears ungenerous in length and may interfere with the ambulance path, despite the proposed marking to keep the area clear.
  - iii. Ground floor plan - Visitors to the new medical tenancy may want to be dropped off. Pedestrian desire lines may tempt visitors to walk from the main hospital drop off area across the driveways to get to the medical tenancy. A drop off area on the medical tenancy side would be an improvement.

## 6. Design

- a) The proposal does not take the opportunity to improve the pedestrian access and streetscape connection on Urunga Parade of the existing hospital, in particular the existing loading dock.

## 7. Heritage

- a) Demolition of the listed heritage item at 366 Crown Street Wollongong is not supported at this time as it is contrary to Part 16 of WDCP 2009 Chapter E11: Heritage Conservation and Clause 5.10 of WLEP 2009. Alternatives for the project that do not involve demolition of a listed heritage item should be explored.

## 8. Landscaping

- a) Opportunities for landscaping the walkway/verandah of the ground floor new medical tenancy on Crown Street should be explored. Landscaping at ground level would provide more visual amenity for occupants of the medical tenancies and hospital on higher levels of the building.
- b) A survey of underground services should be undertaken to confirm the viability of 'deep soil' street trees on Urunga Parade.

If you have any questions regarding the above, please contact me on the telephone number below.

This letter is authorised by

**Pier Panozzo**

City Centre and Major Development Manager  
Wollongong City Council  
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