

Illawarra Retirement Trust (IRT) Group (Registered  
Community Housing Provider)  
C/- NSW Department of Planning, Housing and  
Infrastructure  
4 Parramatta Square  
12 Darcy Street  
Parramatta NSW 2150

**REFERENCE**

Date

**DE-2025/70**

25 August 2025

Dear Sir/Madam

**SSD-73910208**

<b>Development</b>	State Significant Development – Seniors Housing – IRT Woonona Redevelopment (SSD-73910208) - Redevelopment of existing Seniors Housing development including the construction of five (5) apartment buildings containing independent living units, adaptive reuse of existing church, alterations/additions to existing Residential Care Facility, wellness hub, landscaping and car parking
<b>Location</b>	Retirement Village  2-8 Popes Road WOONONA NSW 2517

Thank you for providing Council with the opportunity to comment on this proposal.

The submitted documentation from the proponent responding to the Department's SEAR's has been reviewed. Appropriately, the proponent and the Department have undertaken extensive consultation with relevant government agencies and key stakeholders and it is noted that two meetings have also been convened with the State Design Review Panel who have provided commentary to guide expected design and amenity outcomes having regard to the context of the site.

Likely key assessment issues include the building height departure, visual impact upon two heritage items – the Illawarra Escarpment backdrop and former Church within the site and flood hazard mitigation.

Aged Care developments in general have support from Council, particularly where they are appropriately sited and take advantage of existing infrastructure and services.

Comments from relevant sections of Council as follows:

**Traffic and Transport**

The proposed traffic generation will result in an increase of 28 AM peak and 42 PM peak hour trips. This results in an additional 3 seconds of peak hour delay which is negligible in terms of overall traffic network impact.

The car parking provision meets the minimum SEPP requirements (176 spaces required, 182 spaces provided). The applicant has prepared a 'Preliminary' Green Travel Plan (GTP) for staff which will assist in reducing reliance on private vehicular travel and encourage the use of sustainable modes of transport. The 'Preliminary' GTP proposes monitoring and review which is an important aspect of the proposed plan. It is recommended that if all DA matters are resolved, a Condition of consent would be

required to ensure that a final GTP is prepared by the applicant with suitable targets, measures and monitoring to be included in the document.

Staff bicycle spaces and end of trip facilities are a requirement in the Wollongong City Council DCP Chapter E3 and a recommendation in the TIA, which will assist in reaching GTP targets and objectives. However, these facilities have not been shown on the plans.

The internal layout has been tested with the swept paths of the design vehicle (waste truck and ambulance). However, passing assessments within the new car parking areas have not been carried out.

The CTMP is noted which will manage construction traffic impacts.

The following issues are raised:

- Swept paths of a B99 vehicle passing a B85 vehicle need to be shown within all new car parking areas, ramps, aisles and all two-way manoeuvring areas with additional clearances of 300mm to any solid obstructions as per AS2890.1.
- Table 3 of the recently adopted Chapter E3 of the DCP requires additional van loading bays for parcel deliveries, uber eats, menu log etc. Based on the proposed GFA, and additional 2 x van loading bays need to be provided within the site.
- Bicycle parking spaces for staff need to be provided within secure cages with a self-closing door and combination keypad as required by AS2890.3.
- End of trip facilities need to be provided as per the requirements of Table 1 of Chapter E3 of the DCP.
- In relation to the waste management Plan, Wollongong City Council's Waste Team require the recycling generation rates to be increase to 80 litres of recycling per unit, 40 litres per unit FOGO. Accordingly, bin rooms will need to be increased in size.
- The Waste Team require recycling bins and FOGO bins to be provided on each floor above ground (in addition to the waste chutes proposed) to ensure that the waste streams are dealt with properly and not mixed. The current arrangements may result in residents putting recycling down the waste chutes.

## Environment

Clarification required - on page 157 under the heading of Biodiversity, the SoEE incorrectly states: *"A biodiversity Assessment Report has been prepared for the proposed development, which has assessed the proposal in consideration of serious and irreversible impacts on threatened vegetation community on the Cumberland Plain Woodland in the Sydney Basin Bioregion Critically Endangered Ecological Community the Cumberland Plain Woodland in the Sydney Basin Bioregion Critically Endangered Ecological Community (CEEC). Residual impacts to native vegetation will require eight ecosystem credits and eight species credits in accordance with the Biodiversity Offsets Scheme."*

A fully tanked basement design should be expected at this site due to proximity to a watercourse.

Conditions can be provided if/ when required in relation to:

- implementation of sustainable building design measures,
- design of a tanked basement,
- preparation and implementation of a construction environmental management plan,
- preparation and implementation of an erosion and sediment control plan,
- preparation and implementation of a waste management plan,

- preparation and implementation of a construction noise and vibration management plan,
- preparation and implementation of a vegetation management plan,
- restricted hours of work,
- implementation of the recommendations of the biodiversity development assessment report,
- credit retirement,
- implementation of the recommendations of the detailed site contamination assessment report,
- implementation of the recommendations of the noise impact assessment report,
- discharge of accumulated water during construction, and
- maintenance of water sensitive urban design measures

## **Design**

It is noted the proposal has been the subject of two State Design Review Panel (SDRP) meetings with recommendations made. The Department is encouraged to separately evaluate the proponent's design response.

### Context and Neighbourhood Character

The importance of the signalised pedestrian crossing across the Princes Hwy has not been highlighted in most of the site analysis documentation. This should be clearly illustrated and emphasised on all relevant documentation to ensure alignment of site entries and view corridors are appropriate.

The view corridors to the escarpment and the riparian corridor identified by the applicant on page 7 and 11 of the SDRP Response Report are not convincing. The café pavilion off the church, the south of Building B, and the port cochere awning structures connecting Building C with the RAC all impede or impact on the view lines through the site and towards the escarpment. It is also noted that the north-west corner of Building B disrupts view lines to the Riparian corridor. Some modifications to building footprints and/or alignments are recommended. Refer also to comments under *Landscape*

The view corridor to the heritage building from the north of Princes Hwy is successful, however the applicant is encouraged to also improve view lines to the heritage building from the south of Princes Hwy by potentially cutting back the north-eastern corner of Building D and increasing the amount of open space to the south-eastern side of the heritage building.

Activation and engagement with edge of riparian corridor has improved by providing opportunities for residents and their visitors to engage with and create stronger visual connections to Collins Creek, due to the proximity and orientation of the club house and its associated outdoor spaces. Opportunities to engage with Gahans Park is also encouraged.

There is an existing substation located in the middle of the site. It is not clear where this will be relocated given the extent of the basement area proposed. The extent of basement carparking area remains a concern as this represents an unnecessarily large volume of soil to be removed. Combined with the known substantial flooding impacts at this location, this is a poor environmental outcome.

On architectural drawings A700-A700.1 it is difficult to identify the extent of shadows produced by the proposed buildings and differentiate them from the existing shadows produced by other surrounding dwellings. It is recommended that the graphic representation of the shadow diagrams be revised to clearly outline what shadows have occurred due to the proposed development.

Interfaces and building separation with the western neighbouring properties have improved by relocating the internal roadway along the western boundary, however, the visual privacy sections provided on architectural drawings A213-A216 have been located in such a way that does not display how visual privacy or overlooking is to be mitigated. For example, in the section on drawing A213, the

landscape buffer should be dimensioned and highlight what impact this would have on the overlooking concerns.

Furthermore, the sections have only been taken through bedroom windows, however the more contentious interface is that through the living room windows and POS balconies. Providing a note which states “narrow window opening” does not convincingly demonstrate that visual privacy has been mitigated. This is particularly evident in the section provided on A216 which clearly shows that overlooking into the southern neighbouring dwelling from Building D is possible. All interface sections are to be reviewed.

As indicated in the comment above, visual privacy impacts to neighbouring properties along the west remain a concern. The existing building, whilst sitting closer to the boundary, includes angled windows focusing views away from the boundary and neighbouring dwellings. The current proposal, whilst providing increased setbacks, provides views directly towards neighbouring properties, and the ability to provide meaningful landscaping along the western boundary to assist in combatting visual privacy is questioned given the proposed width of the landscape strip. Further articulation of the western façade should be considered to direct views away from the neighbouring dwellings.

#### Built Form, Scale, Aesthetics and Materiality

The shifting of Building B further north is an improvement; however further adjustments are recommended for Building B to align with the existing Residential Aged Care Facility (RACF) as a minimum to assist in maintaining and/or improving view corridors through the site and towards the escarpment from the Princes Highway. Refer also to comments under *Context and Neighbourhood Character*.

The additional buildings and pavilions proposed to connect to both the north and south side of the existing heritage church is questioned, particularly the cafe provided to the south. This disrupts view lines to the escarpment which is not supported. Refer also to comments under *Context and Neighbourhood Character*.

The various built forms are generally well articulated with some nice contemporary details proposed. Whilst the bold contemporary forms are visually appealing, they do not appear to be devised from site location or existing context. The proposed materials, colours, façade modulation and roof forms do not establish a strong relationship with the existing heritage building on site and would benefit from drawing greater inspiration from the surrounding context to achieve a more sympathetic and cohesive outcome.

Prefinished and durable materials/finishes are strongly encouraged by Council, and applied finishes should be minimised. This includes any painted or rendered surfaces, noting the accelerated effects of weathering are likely. All proposed finishes are to be clearly specified and noted on drawings (not currently provided). This includes brick specification, cladding types, colour/profile/finish of plant screening etc. Large scale details should also be provided for key features such as balustrading, window boxes, roof and awning details etc. to ensure that the architects vision is fully realised.

The proposed finishes to the existing Flametree RACF are noted as bagged and/or painted which is not accepted. The applicant is encouraged to explore a revised colour pallet that incorporates the existing face brickwork to avoid unnecessary paint, render or bagging of brickwork to maintain a low cost and durable finish that requires less ongoing maintenance. The photomontages provided on architectural drawings A900-A902 should also be updated to show the proposed material and colour pallet of the RACF to better understand how it integrates with the overall development.

The blank wall presentation along the western side of building B is a result of the placement and orientation of the basement carpark driveway ramp entry. This along with the general abundance of blank walls to the ground floor plane of all Building B frontages, provides a poor interface, lack of activation, and insufficient passive surveillance to the main internal roadway and other associated outdoor spaces, bringing into question the suitability of the basement ramp location and orientation.

Building E equally presents a very defensive and blank ground floor façade, particularly along the eastern frontage facing Princes Hwy, which lacks activation and visibility and does not integrate well with the surrounding landscape. The proposed gym use on the ground level is dominated by solid sandstone walls and timber battens, providing an internalised building program that does not engage well with the streetscape or associated outdoor spaces.

The increase of proposed bulk and building width/depth of Building C and D is a concern. In particular, the consolidation of Building C, into one built form has resulted in a bulky building appearance with dark internalised corridors and convoluted circulation areas that have no access to natural light or ventilation. By merging the buildings into a large triangular wedge shape, the perception of bulk and scale has increased. This appears to be a result of filling in the open areas rather than redistributing the mass. Consideration should be given to whether an L-shaped configuration, or other alternative, may provide a more appropriate built form outcome than the current triangular wedge arrangement.

The proposed rooftop service and plant areas across all buildings are not well integrated into roof designs or overall built forms. They are visually dominant and contribute to the perceived bulk and scale when viewed from surrounding areas, presenting as an additional storey in some instances, breaching the height limit. This is not supported and the clause 4.6 height departure must be carefully considered by the Department.

#### Landscape and Outdoor Open Space

Several comments have been made above in relation to the view corridors through the site; however it should also be noted that there may be opportunity for the landscape design to emphasise the view corridors, particularly that running east-west towards the escarpment. An option may be to consider a feature tree or other significant landscape feature to draw one's eye through the site from the Princes Highway and up towards the escarpment beyond.

More detail is required regarding the proposed new pedestrian ramp in the north-western corner of the site adjacent to Popes Road. It appears that the existing ramp is being demolished, and a new ramp and stair configuration is being constructed. It is assumed this is being done to ensure compliance is achieved, however no details or Reduced Levels (RL's) have been provided. A large-scale detailed plan of this area is recommended.

A detailed section of the proposed pedestrian bridge along the eastern side of Building A is required to better understand its relationship with the drainage channel below, and how this integrates with the surrounding landscaping. It is also unclear as to how much of the existing established vegetation will remain in this area. Clarification is required.

The general arrangement landscape plans should be updated to clearly differentiate between new proposed trees and existing trees that are being retained. It should also be noted that wording such as "tree to be retained if possible" is not accepted. A detailed arborist report along with consultant coordination is to clearly determine which exact trees have been identified for retention and Tree Protection Zones are to be clearly noted and coordinated on all relevant architectural and landscape plans.

There is a lack of separation provided between the south-western end of Building A and the proposed internal road to the West. A more generous area of landscaping is required to provide a sufficient buffer between the habitable areas of the various units and the roadway.

It is unclear why a 2.8m high solid retaining wall has been proposed along the length of the western boundary. More information is required regarding the finish and constructability of this wall. Due to the height proposed, the footings required will likely be wide and potentially impact a significant portion (if not all) of the proposed landscaping along the western boundary. The width of this landscaping strip is to be clearly dimensioned in plan and section, and more detailed information of the proposed fencing and walls is to be included to ensure that meaningful landscaping can be maintained along this entire boundary to accommodate mature trees and sufficient planting buffers for neighbouring properties.

The raised landscaped area provided to the south of Building B appears to be a result of providing sufficient head clearance to the basement carpark ramp below. Rather than taking on the exact shape of the ramp, this landscaped area could be better integrated into the overall landscape design and vision. Perhaps gentle mounding to provide a more subtle level change and feature rather than a raised planter that's shape is reflective of the basement ramp below.

Ensure coordination between architectural, landscape and drainage/flood to accurately determine the visual impact of the drainage channel across various areas of the site. Detailed sections of the drainage channel in various locations are to be provided as part of the landscape documentation to ensure coordination has been undertaken and that it integrates well with the surrounding landscape design.

-  
An area of particular concern is that along the northern boundary of Building E. It should also be noted that whilst Section 2 on landscape drawing 5001 shows an acceptable landscape solution for the drainage channel, it is imperative that this has been coordinated with the stormwater and flood engineering to ensure the landscape vision can be achieved in its entirety.

-  
The numbering of the landscape sections on landscape drawings 5001-5003 are inconsistent with the numbering provided across the various landscape plans. A key plan is to be provided on each of the section drawings clearly noting the location of each detailed section to avoid confusion.

-  
Section 7 on landscape drawing 5003 should be extended further to the left to capture the creek below if possible, and Section 8 should be extended further to the right to show the full area between Building C and the heritage building.

#### Amenity, Safety and Sustainability

Council has declared a Climate Emergency and expects new developments to exceed minimum mandatory sustainable buildings criteria. This includes (but is not limited to) solar panels, rainwater harvesting and reuse, use of electric-only appliances and systems, EV chargers, bicycle parking for residents, staff and visitors, prefinished durable materials with low embodied energy, and low water use planting. These are to be considered and incorporated into all buildings.

Whilst there is a heavy reliance on operable skylights to upper-level units to assist with achieving adequate natural ventilation, more than 60% of units achieve natural cross ventilation which is accepted.

It is difficult to confirm solar access compliance given the scale and quality of the solar access diagrams provided on architectural drawing A701. The diagrams are to be provided at a larger scale to ensure that the windows and balcony areas being assessed can be clearly seen. Some additional larger scale detailed views may also be required for some units.

The development has proposed a floor-to-floor height of 3.2m for typical residential levels, which appears capable of providing 2.7m high ceilings to habitable areas, whilst incorporating all required structure and services.

Access to natural light in the southern portion of the circulation corridors across all levels of Building D is not provided. There are similar concerns with the lack of natural light and ventilation to circulation corridors and foyer spaces of Building C also.

Several unit types (including unit type 02, 07, 08, 10, 11, 17, 18, 19, and 22) provide open plan layouts which exceed the maximum 8m room depth requirement as set out in Objective 4D-2 of the ADG. *"In open plan layouts (where the living, dining and kitchen are combined) the maximum habitable room depth is 8m from a window."*

Whilst Unit Type 23 provides a small window to the living space, the amount of light is questioned given the depth and proportion of the room. On this basis it is recommended that an additional window or sliding glass door is provided to the living area which opens out directly onto the balcony space.

The full extent of the basement carpark is unclear on architectural drawing A100, in particular its relationship with the existing RAC building, which should be updated for clarity. On architectural drawing A300.2 it appears that pedestrians accessing the RAC from the basement carpark are required to transverse through the loading, waste and laundry area to access the lifts which is not acceptable and raises concerns in regard to safety and wayfinding, with possible pedestrian and vehicular conflicts, as well as the poor identification and visibility of the lifts from parking areas.

Storage cages within the carpark area should be provided for all units where possible. These can be useful for larger and less frequently used items or large outdoor items which may not be practical to store within a unit. Ensure that the location of any storage cages does not impact visibility and surveillance throughout the carpark.

If waste chutes are being provided, they should discharge into a separate secure waste rooms that are not accessible to residents to avoid potential safety issues.

## **Geotechnical**

The Geotechnical Site Investigation Report and the Additional Geotechnical Site Investigation Report, both dated 19 May 2025 by Soilsrock Engineering Pty Ltd has been reviewed with a site inspection and comparison to known geotechnical studies for the general area.

The proposal includes a single level basement carpark that will extend underneath the entire footprint area of the five new buildings, which would require cut excavation up to approximately 5.9 metres depth.

The Geotechnical report provides a good description of site conditions, demonstrates feasibility of the development from a geotechnical perspective and makes appropriate recommendations for the development. It is noted that the development will entail significant earthworks as part of the site preparation are within soils which are subject to high water table conditions. This will require careful design of the earthworks and close geotechnical supervision particularly for the management of groundwater during construction and to ensure that adequate support is provided during and after construction to protect adjoining development.

Conditions can be provided for as/when required.

## Stormwater and Flooding

The Department should require the development to be re-designed to satisfy the requirements in Chapters E13 (Floodplain Management) and E14 (Stormwater Management) of the Wollongong Development Control Plan (WDCP) 2009 and Clauses 5.21 and 5.22 of the Wollongong Local Environmental Plan (WLEP)2009.

Council's records indicate that the site is coded as 'Flood Risk Precinct Classification under Review'. Council is currently in the process of updating the Floodplain Risk Management Study and Plan (FRMS&P) for the catchment. A draft Collins Creek FRMS&P was publicly exhibited in March 2024 and a final version of the study is expected to be put before Council for adoption shortly.

Currently adopted information on flooding at the site can be found in Council's adopted Collins Creek Flood Study (dated 2019), which is publicly available via the NSW State Emergency Services (SES) Flood Data Portal. However, this flood information will be superseded by Council's Collins Creek FRMS&P, once adopted.

A detailed flood study should be prepared by a suitably qualified civil engineer in accordance with Chapters E13 and E14 and submitted with the application. The flood study should:

- Be calibrated against a recorded storm event or Council's adopted Collins Creek flood model (dated 2019) or alternatively use Council's adopted model as the base-case pre-development scenario (Council's adopted flood model incl. report, model files, results, etc. can be downloaded from the SES Flood Data Portal);
- Identify pre and post development 20% AEP, 1% AEP, and Probable Maximum Flood (PMF) levels and extents, hydraulic hazard, flood function (incl. floodway and flood storage areas), flood risk precincts, consistent with Chapter E13 of the Wollongong DCP 2009 and inclusive of the 10 metre set back from watercourse banks in mapping of High FRP (per s6.3 of Chapter E13);
- Identify pre and post development flood storage volumes and flood impacts for the development;
- Include all changes to surface levels, structures, and/or roughness values within the floodplain as a result of the proposed development (incl. landscape planting and/or riparian revegetation, earthworks, bridge/culvert structures, fencing, etc.) and apply blockage factors as per Section 5.2 of Chapter E13;
- Demonstrate that the development will not result in off-site flood level increases exceeding the permissible impacts stipulated in Table 2 of Chapter E13; and
- Demonstrate how the proposal will satisfy all floodplain management controls, objectives, and performance criteria in Chapter E13 of the DCP and Clauses 5.21 and 5.22 of the WLEP2009.
- Note in relation to the above, the information reviewed by Council included a pdf document titled 'Appendix R - Flood Impact Assessment (Compressed)', however when opened this pdf is an identical duplicate of the other submitted pdf titled 'Appendix Q - Flood Emergency



Response Plan'. As such, a Flood Impact Assessment for the proposal has not been seen or reviewed by Council.

The consent authority should ensure that compliance with Chapter E13 (Floodplain Management) and the provisions of Clauses 5.21 and 5.22 of the Wollongong LEP2009, relating to flood planning, are achieved.

An independent detailed survey plan of the site by a registered surveyor to Australian Height Datum (AHD), including lot boundaries, contours/spot levels, easements, services, pavement surface levels, existing drainage, watercourses, top and bottom of watercourse banks, etc. should be submitted with the application.

A stormwater concept management plan including on-site stormwater detention (OSD) and demonstrating compliance with Chapter E14 (Stormwater Management) should be prepared by a suitably qualified civil engineer. The consent authority should ensure that compliance with Chapter E14 is achieved.

The stormwater concept plan should be accompanied by detailed pre and post development stormwater calculations showing pre and post development catchment boundaries/areas and flow rates discharging to each proposed stormwater disposal point. This information should demonstrate no increase in discharge rates to any disposal point as a result of the development.

Stormwater disposal should be designed to comply with Section 9.3 of Chapter E14 of the Wollongong DCP2009. Stormwater outlets to watercourses should be to a point where the watercourse is well defined, having defined bed and banks. This should be confirmed by survey (incl. top and bottom of watercourse bank).

The finished surface levels should be designed to ensure no re-direction of stormwater between catchments. This should be demonstrated with plans showing pre and post development catchment boundaries and areas to each proposed stormwater disposal point.

The design should ensure the proposed stormwater and landscape plans are compatible, including stormwater pits/pipes/detention storage facilities and existing/proposed trees and vegetation, and stormwater lines/outlets and riparian revegetation.

#### Sensitive Land Use within Flood Planning Area and High/Medium FRP – Not Supported:

Although a flood study and flood risk precinct mapping has not been provided, it is apparent that the proposal includes a sensitive use located within the Flood Planning Area (FPA) and within a High and Medium Flood Risk Precinct.

This proposal is inconsistent with the controls, objectives, performance criteria, and requirements in Chapter E13 (Floodplain Management) and Clauses 5.21 and 5.22 of the Wollongong LEP2009.

The proposed land use is classified as 'Critical Utility' according to Chapter E13 of the Wollongong DCP2009 and as a sensitive land use according to Clause 5.22 of the Wollongong LEP2009. Such uses are not suitable within the High/Medium Flood Risk Precincts and/or the FPA.

Clause 5.22 also requires that development on flood-prone land must incorporate appropriate measures to manage risk to life and avoid adverse environmental impacts during flood events. The proposed location of seniors housing within a high flood risk precinct fails to meet these criteria and increases flood risk to vulnerable occupants.

The existing flood risk precincts and FPA for the site should be appropriately delineated in accordance with Council's DCP, and the development re-designed such that there is no increase in sensitive use within the delineated High/Medium Flood Risk Precinct and/or FPA.

Development within Floodway and High Flood Risk Precinct – Not Supported:

The proposal includes a proposed building (Building E) located within a significant flow path associated with the watercourse through the site, and the realignment of the piped watercourse and flow path to facilitate this building.

This existing flow path has been mapped as a floodway and High Flood Risk Precinct in Council's Draft Collins Creek Floodplain Risk Management Study & Plan, which was publicly exhibited March 2024 and is pending adoption by Council shortly.

The proposal re-purposes a mapped floodway for built form to facilitate a sensitive land use and is considered contrary to a number of key floodplain management related statutory and policy documents including:

- o Chapter E13 of the Wollongong DCP2009.
- o Clause 5.21 of the Wollongong LEP2009.
- o NSW Government Flood Risk Management Manual (2023)

This proposal is inconsistent with Principles 5, 6, 8, and 9 of the NSW Flood Risk Management Manual (2023), which collectively require preservation of floodways, avoidance of sensitive land uses in high hazard areas, and robust planning for future flood risk. Principle 5 emphasises the need to understand and preserve flood behaviour and constraints, while Principle 6 requires consideration of future changes to flood risk. Principle 8 explicitly states that natural flood functions must be maintained, and Principle 9 promotes a risk-based approach that prioritises safety, particularly for vulnerable land uses such as seniors housing.

Council recommends, in the strongest terms, that the applicant be required to amend the proposal such that the existing flow path and floodway is not modified, and Building E is wholly removed from the flow path and FPA.

Building over Piped Watercourse – Not Supported:

The proposal includes a building (Building A) encroaching over an existing piped watercourse and common drainage line. This proposal is inconsistent with the requirements of Section 9.4 in Chapter E14 of the Wollongong DCP2009.

Whilst it is acknowledged that the current building encroaches (to a lesser extent) over this piped watercourse, the redevelopment of the site should resolve, not perpetuate, this legacy conflict.

Council does not support the realignment of, and/or construction of a new building over, the piped watercourse. The proposal should be redesigned such that proposed new buildings do not encroach over the existing alignment of the piped watercourse.

## Heritage

The subject site contains the Heritage item #61007 "Former Woonona Uniting Church" located at 2-8 Popes Road. There are a range of existing building on the site, approved for demolition that ranged from having some heritage value (former butcher shop/rectory) to being intrusive elements on the site. A number of heritage items are also located in the vicinity of the site in the Woonona Town Centre which are not duplicated here.

Generally the SSD documentation and application is missing a significant amount of detail that Council would require for adequate consideration of Clause 5.10 of the LEP and the impacts of the development on the listed heritage item as a matter of course.

The SEARS required:

*19. Provide an Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared in accordance with relevant guidelines, identifying, describing Aboriginal Cultural Heritage Assessment Report assessing any impacts to any Aboriginal cultural heritage sites or values associated with the site. - Austral ACHAR*

Council cannot comment on the adequacy of the ACHAR due to the redacted version being provided. An updated copy of the ACHAR is requested and comment from heritage NSW on Sear 19.

*20. Environmental Heritage Where there is potential for direct or indirect impacts on the heritage significance of environmental heritage, provide a Statement of Heritage Impact and **Archaeological Assessment** (if potential impacts to archaeological resources are identified), prepared in accordance with the relevant guidelines, which assesses any impacts and outlines measures to ensure they are minimised.*

A Heritage Impact Statement has been prepared by Weir Phillips Heritage and Planning dated April 2025. The HIS does not adequately consider Chapter E11: Heritage Conservation of the Wollongong Development Control Plan and does not assess the proposed development against the relevant controls. There is also no discussion of impacts such as building upgrades required for the change of use, or potential construction impacts from the significant basement car parking proposed.

The HIS also notes that no archaeological assessment has been prepared by Wier Phillips. Noting the significant excavation that will be required to accommodate the basement car parking, this assessment is necessary to adequately consider the proposed development. It has not been demonstrated there is no historic archaeological potential on the site.

Therefore SEAR 20 has not been satisfied.

## Built Form

The change to the alignment of Building C is noted as having been substantially amended to retain the view corridor from the Princes Highway to the North of the site (from Woonona Town Centre. This realignment is supported.

However the height, scale and bulk of the proposed new built form which it is noted was not provided at PL, is required to be further considered in terms of the relating the scale to the ridgeline of the Church Building and retaining views both to the site when travelling along the Princes Highway and through the site west to the Illawarra Escarpment.

The Bonus LEP Height limits should be complied with additional height such as the screening for plant room on building C and D is in close proximity to the heritage item and will be highly visible from the public domain, contributing to the unsympathetic built form and scale that is visually dominating the ridgeline of the church building. The argument put forward in the Variation statement that a reduction in building footprint has retained viewed to the Escarpment is not supported by the Visual Impact Analysis. Views west to the Escarpment are blocked by the wall of built form for a significant length. The only corridor of the Church Building west again has in appropriate built form encroaching into the Church building to the northern elevation.

The Visual Impact Assessment: Urbain Group June 2025 shows short range views to the Escarpment and Church Building are significantly impacts by the proposed built form arrangement. The following views are listed as examples of the impacts of the proposed scale, height and setback as discussed below.

- View 02 - All existing Ridgeline views blocked. Stepping Building E down may assist in retaining view to Escarpment ridgeline
- View 11 - Ridgeline and church views blocked travelling north along Princes Highway. Setback should be increased or built form stepped back in part to open view corridor to Church Building.
- View 15 and 16 - Stepping down Building D and E stepped to Church scale would assist in partially retaining Escarpment ridgeline views
- View 17 - Fourth storey blocking ridgeline views to Escarpment, stepping down to three stories would improve this view and increased setback would open view to Church

The Height of Building E and D should be more sympathetically designed to step down to the south and north respectively to three stories to better relate to the Heritage item. This would still create built form above the ridgeline of the church building which is not the preferred outcome, however would allow the LEP height limit to be complied with for the lift overrun and screening and assist in creating a more relating scale of the built form sandwiching the heritage item from both the north and south.

The setback of Building E should also be increased and cited to demonstrate an improvement of views to the Church whilst travelling north to Woonona. The HIS indicates that the existing building (now demolished) historically impeded these views however the scale of the two storey building was not comparable to the proposed and allowed some view corridors to be retained to the roof form of the Church when travelling north. There is also no comparisons of the setback of the demolished building and the proposed building, which appears to be set further forward on the site (at least in most parts) further impacting views. Therefore the proposed setback of building E is not supported and consideration of view impacts requires further analysis in the HIS.

There are very little existing views to the Riparian Area from the public domain. This view is not identified in the HIS as significant and this retention of this view corridor is not discussed. These views would only be internal site views from a very specific location in the proposed entry forecourt. The

merits of prioritising this view corridor above setting back Building D to Princes Highway and retaining views to the church when travelling North along Princes highway should be reconsidered.

### Basement Car Parking

The basement car parking plan shows car park and basement construction proposed in close proximity to the heritage item including to the south and at the front of the item. This would require significant excavation and construction of a shoring wall to the foundations of the heritage item, which has the potential to compromise the structure integrity of the building and cause damage and future maintenance issues relating to water movement. The potential construction impacts are not addressed in the HIS. The basement level is not supported from a heritage perspective, and should be significantly reduced and moved away from the heritage item.

A Heritage Construction Management Plan is required to be prepared along with structural engineering investigations of the heritage item that demonstrates that the proposed basement has been designed in a way that will not impact on the heritage item, and provide management recommendations for protection of the heritage item during all phases of construction.

### Use of Church Building

The EIS and HIS notes that internal reconfiguration and demolition works are proposed to the Church Building to support a change of use to a restaurant and all fit out and services will be reversible. However there are no plans or detail of what work is proposed to the church building, how the additional pavilion and kiosk would function, what is proposed to be accommodated in the church building (kitchen, storage, dining etc). Floor plans and demolition plans are requested for the heritage item, and additional structures.

There is also limited detail in the Section plans of the proposed design of the kiosk and pavilion buildings. Detail on how these additional structures will be connected and integrated to the heritage item, impacts to windows and the proposed 'link' is required as well as a detailed schedule of External Finishes specially for these elements is required.

The use of the Church Building as a restaurant may be a suitable adaptive reuse, however there is not sufficient information provided to consider the potential impacts of this use on the building including waste disposal, grease traps, cold storage, additional weight to the structure, outdoor shade structures, business identified signage and other change required to meet food safety and building code requirements. There is no detail on how the use would be accommodated in the building, or discussion of potential issues that need to be considered for adaptive reuse of heritage items. The scale of the restaurant use will likely impact on these upgrades.

A National Construction Code Report is therefore required that details any upgrades such as access, fire safety, egress, WC etc. to the church building to accommodate this change of use. The potential impacts of these changes should be addressed in an updated Heritage Impact Statement.

### Conservation Outcomes

As an outcome of a significant redevelopment of the site, it is also anticipated that a Schedule of Conservation Works to the Church Building is prepared and provided and this is implemented as a

condition of consent. The Schedule should be based on a condition report of the building and identify works such as roofing repairs, window reinstatement and replacement of unsympathetic aluminum windows (as noted in HIS), demolition of half wall, gutter upgrades, repointing, flooring works, painting etc. that should be undertaken to ensure monetary benefits can be tied to the conservation of the Church from any future approval.

A Schedule of Ongoing Maintenance Works should also be prepared and updated following completion of the Conservation Works, to be tied to the ongoing operation of the Senior Housing facility through a Positive Covenant on title, or other mechanism in the operational plan. This Schedule should be provided and advice on how it will be implemented as an outcome of this development. As noted in the HIS - "Consent is sought for alterations and additions to the existing heritage item which will help to conserve the item by providing a viable use for it that will raise the necessary funds required for its long-term maintenance." The conservation outcome and long term maintenance is required to be demonstrated in the proposal.

A Heritage Interpretation Strategy for the site, including publicly accessible interpretive outcomes such as wayfinding and landscaping, information on the history of the Church demolished significant buildings, image displays and other devices to be delivered as part of the broader development and more focused outcomes on the restaurant use and Aboriginal Cultural value associated with the riparian land should be prepared and provided.

#### Aboriginal Archaeology

An Aboriginal Cultural Heritage Assessment Report has been prepared by Austral Archaeology dated April 2025. The ACHAR identified an area of moderate archaeological potential and a potential Scar Tree in the riparian corridor. It is noted that Council's Heritage Coordinator had similar questions raised in the ACHAR about the validity of tree species as a scar tree however it is now a recorded Aboriginal Site and is required to be treated as such under the NPPWA.

The ACHAR is redacted - a full copy of the ACHAR is requested to allow Council to review the information and provide adequate comment. The ACHAR indicates no impacts are proposed to the area of moderate potential which is supported, however again Council cannot review the plans including vegetation management against the ACHAR as the maps are redacted.

Comment should be sought from Heritage NSW and the development notified to the Local Aboriginal Community.

#### Recommendations

The following broad recommendations are made and a list of additional documents that should be provided to Council is included below:

1. The citing and built form of the proposed new development in particular Building D and E is more carefully considered with input from Wier Phillips and better discussion of the potential built form outcomes in the HIS;
2. The Setback of Building D be increased to improve views travelling north to the Church Building and Illawarra Escarpment ridgeline.

3. Building D and E should be LEP height compliant, and more sympathetically designed and step down to three stories as they approach the Church building to better relate to the scale of the heritage item and improve visual impacts;
4. Additional detail should be provided on the proposed adaptive reuse of the Church building as a restaurant, and the kiosk and pavilion structures. Additional information on the conservation outcomes for the Church building including heritage interpretation should also be prepared and be delivered as an outcome of this development.
5. The basement carpark should be reduced and a greater physical buffer to the heritage item proposed to mitigate potential construction impacts.
6. Historic Archaeology is required to be considered a part of SEAR requirement 20;
7. An updated Heritage Impact Statement that adequately addresses Chapter E11 and the SEARs requirements, as well as responding to the above should be provided.

#### Additional Information Required

1. Copy of non-redacted ACHAR
2. Historic Archaeological Assessment to satisfy SEAR Condition 20
3. Heritage NSW Comments on above
4. Amended site plans, elevations, VIA and HIS that respond to point 1-3 and 5 of the above;
5. Floor plans of internal changes and fit out to accommodate restaurant use in Church Building; Demolition plan of internal partitions, fit out, lighting etc; Sections of pavilion, kiosk and proposed link and detailed Schedule of Colours and Materials for these elements;
6. National Construction Code Report that identifies any upgrades required to the Church Building for the change of use and updated HIS that addresses the potential impacts of the required upgrades;
7. Schedule of Conservation Works to be delivered as an outcome of the proposed development to Church Building based on a Condition Report;
8. Schedule of Ongoing Maintenance Works and advice on how this will be implemented in the ongoing operation of the Aged Care Facility;
9. Heritage Interpretation Strategy for whole development site that integrates with Landscape Concept plan;
10. Heritage Construction Management Plan and Structural Engineering Plan that considers and mitigates potential basement car parking impacts.

## **Contributions**

The IRT is a registered community housing provider under the Housing Act 2001. The proposed development is for seniors housing as defined in the SEPP (Housing for Seniors or People with a Disability) 2004. Therefore, the development is exempt from Section 7.12 contributions under the Wollongong City-Wide Development Contributions Plan 2024.

## **Community Services and Safety**

### Landscaping

Pavers used on footpaths and walkways - consider maintenance of these paved areas, small changes in levels could create trip hazards causing dangerous conditions for older users or people using mobility aids. Seamless integration from one finish to another must be achieved. Small unit paving is not supported – high risk for variation in surface creating trip hazards.

Seating - options to be reviewed, hard surfaces with no back support or arm rests are not an appropriate option suitable for an aging population. Seating to be provided at regular intervals along pedestrian walkways to allow elderly residents places to rest.

BBQ - design is to enable use of a wheelchair user. Underneath cutaway is required to enable the person to wheel underneath the BBQ Plate.

Lighting – what type of treatment is being used to light the pedestrian walkways? Bollard lighting should be considered.

### Diversity

Aging in place document - Unclear if the 1.3 avg people per unit could be applied to all units. This is unlikely to apply to 50% of this proposal which are 3-bedroom units. Evidence as to this data supply should be provided.

The SIA should list the number of dwellings that will be constructed to cater for people with a disability. as the intention of this proposal is to promote aging in place it is assumed to provide for diverse dwelling products and a number of accessible dwellings will be constructed. Adaptable dwellings incur costs to be adapted.

While it is noted the unit floor plans have options there is a significant number of 3 bedroom independent living units proposed noting 51% of the units are 3 bedroom units. How do these options ensure housing affordability to enable a range of income ranges access to these units?

### Safety

Passive surveillance is required to all external areas and should be reviewed.

Location of waste rooms should be in areas that are not concealed.

## **Health**



The proposal outlines the applicant's intention to retain the existing heritage church and repurpose it as a restaurant/café, with new associated structures proposed to the north and south of the church.

However, the documentation provided lacks sufficient detail beyond the conceptual description of the proposed structures and the intended repurposing of the church. As such, it is not possible to adequately assess the proposal against the requirements of the *Australia New Zealand Food Standards Code* and *AS 4674-2004: Design, Construction and Fit-out of Food Premises*.

To proceed with the assessment, amended plans are required that clearly demonstrate compliance with the above standards. All plans must be drawn to scale and include relevant elevations and sectional views where appropriate.

### **Landscaping**

Submission material including Arboricultural report and Landscape Concept designs has been reviewed and conditions can be provided as/when required.

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

This letter is authorised by

**John Wood**  
City Wide Development Manager  
Wollongong City Council  
Telephone (02) 4227 7111