

12 November 2025

TfNSW reference: STH25/00160/002

Your reference: SSD-76440958

Department of Planning, Housing and Infrastructure

By Email: janith.desilva@planning.nsw.gov.au

CC: information@planning.nsw.gov.au; council@wollongong.nsw.gov.au

Attention: Janith De Silva

SSD-76440958 – MIXED USE DEVELOPMENT WITH INFILL AFFORDABLE HOUSING – PUBLIC AUTHORITY CONSULTATION – 221 TO 291 CROWN STREET, 216 TO 238 KEIRA STREET AND 86 TO 90 BURELLI STREET, WOLLONGONG

Dear Janith,

Transport for NSW (TfNSW) is responding to the abovementioned State Significant Development (SSD) application that was referred for comment on 22 October 2025.

TfNSW has reviewed the information provided and requests that the matters in **Attachment 1** be addressed in the applicant's Response to Submissions (RtS) and before the determination of the application.

TfNSW staff would be happy to be involved in an MS Teams meeting with Department of Planning, Housing and Infrastructure (DPH&I) staff and the applicant to further discuss and clarify the comments provided in Attachment 1 if required.

If you have any questions, please contact Andrew Lissenden, Development Services Case Officer, on 0418 962 703 or email development.south@transport.nsw.gov.au.

Yours sincerely



Chris Millet

Manager, Development Services (South Region)

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Context

TfNSW notes for this SSD application:

- The key state classified road is Crown Street that adjoins the site's northern boundary. Atchison Street, Burelli Street, and Keira Street (adjacent to the site's eastern boundary) are local roads managed by the Council. Refer to **Attachment 2**.
- Consent is being sought for the construction and operation of the proposed mixed use shop top housing, hotel and commercial development. The current SSD application represents a more intensive use of the site compared to what has been previously approved (DA-2021/957).
- All light vehicle and service vehicle access is proposed via Burelli Street. Access for light vehicles to the basement car park will be provided through modifications to the existing signalised intersection of Kenny Street, Burelli Street, and Findlay Place.
- TfNSW consent under Section 87 of the *Roads Act 1993* is required for new traffic signals (new signals at the intersection of Burelli Street, Kenny Street, and Findlay Place) and alterations and additions to existing traffic signals (removal of the pedestrian crossing and replacement with signals at the Atchison Street, Burelli Street intersection, etc). In addition, TfNSW concurrence under Section 138 of the *Roads Act 1993* is also required for all works proposed within the Crown Street road reserve.
- Crown Street and Burelli Street are major public transport corridors, each containing bus stops either directly adjacent to (i.e. Crown Street) or opposite (Burrelli Street) the development site's frontages.
- TfNSW previously provided advice on the earlier mixed-use development application for the site in 2022 (DA-2021/957). The TfNSW letter dated 1 November 2022 identified several outstanding issues to be addressed. A number of those issues remain unresolved in the current SSD application.
- In determining the application under Part 4 of the *Environmental Planning and Assessment Act 1979*, it is the consent authority's responsibility to consider the environmental impacts of any road works (e.g. works at existing signalised intersections that are proposed/required, works along the Crown Street frontage, etc).

Additional required information/comments to assist TfNSW and DPH&I with their assessment:

TfNSW requires the following matters outlined below to be addressed in the RtS.

1. Bus stop relocation: The existing bus stop on the Crown Street frontage of the development site is a significant bus stop within the Wollongong CBD. The TfNSW letter dated 1 November

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2022 details the minimum suitable arrangements that the redevelopment of the land must provide to adequately cater for buses, bus passengers and pedestrians at the eastern end of Crown Street frontage. TfNSW has been unable to locate sufficient information (i.e. a plan) that shows the requirements in the above letter relating to the bus stop in Crown Street have been adequately addressed. TfNSW requires a plan that details the following:

- a) The length of the bus zone that is a minimum of 55m to provide sufficient length for three buses to utilise the bus stop at the same time, including any of the three buses to exit upon completion of boarding. This 55m includes a minimum 6m draw out length at the start of the bus zone (the eastern end). Refer to Section 3.7 of the *State Transit Bus Infrastructure Guide*, Issue 2. In achieving the 55m, it should be noted:
 - i) The plan submitted (Public Domain Concept Design, prepared by S&G Consultants Pty Ltd with reference Project No. 20240207, Dwg No. SC02-C301, Revision A Dated 24.04.25) includes a 20m taper. The taper represents the draw out length, and this can be reduced to 6m provided the angle of the kerb (between the widened kerb line and the existing kerb line) is appropriate to allow a bus to draw out. This will need to be supported with a swept path analysis for a 12.5m bus.
 - ii) The above referenced Public Domain Concept Design plan includes a 43.5m bus zone. Excluding the draw out length described above, the bus zone needs to be a minimum 49m in length.
- b) More details are required of any change to the kerb alignment that is proposed at the corner of Crown Street and Keira Street. This includes a swept path assessment for a 12.5m long bus turning left from Keira Street onto Crown Street within the kerb side bus lane with the proposed kerb change.
- c) The bus stop design must ensure there is no lip or step within the bus zone. Cross sections shall be provided to demonstrate the levels comply with applicable requirements.
- d) Details of the regulatory signage locations for the start and end of the bus zone.

2. Crown Street footpath:

- a) TfNSW supports the provision of a widened public domain area to accommodate and appropriately separate pedestrians from passengers waiting to board buses. TfNSW requires that this widened area commence at the start of the bus zone (i.e. the western sign location) and extend to the eastern end of the bus zone, or as close to this point as reasonably practicable. The depth of the public domain area at the bus stops, defined as the space between the kerb and the property boundary allocated for bus passengers and pedestrians, must be a minimum of 5.3 metres.

TfNSW notes that the Environmental Impact Statement (prepared by Ethos Urban, Version 4.0 dated 22/09/2025) states in Section 7.7.5 (Bus Stop Relocation) that a “minimum of 5.3 metres has been provided between the kerb and the building line from the

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front of the first bus, refer to Appendix B". However, TfNSW has been unable to locate the required details in Appendix B. Plans showing the above detail need to be provided.

- b) Insufficient information has been provided to enable TfNSW to support the kerb widening and the associated reduction in travel lanes on Crown Street, as well as a pedestrian crossing that is proposed within the Crown Street kerb widening (refer to S&G Consultants Pty Ltd Public Domain Concept Plans). To enable TfNSW to undertake an assessment, plans are required that:

- i) Detail compliance with Point 1 and Point 2 a).
- ii) Detail the provision of a corresponding widening/blister/kerb extension on the northern side of Crown Street, which will reduce the crossing distance across Crown Street and will encourage pedestrians to cross. Without any kerb widening on the northern side of Crown Street, pedestrians will be encouraged to cross between parked cars and cars undertaking parking manoeuvres. This would create an unacceptable safety risk. The provision of corresponding kerb widening on the northern side of Crown Street would provide pedestrians with a safer crossing location.

This crossing point should not give pedestrians priority, but rather provide the infrastructure required to assist pedestrians in choosing a gap in traffic to safely cross Crown Street. An associated 'No Stopping' zone must be provided in accordance with TfNSW Technical Direction for Pedestrian Refuges TDT2011/01a.

- iii) Sight distance assessment at the crossing point to demonstrate compliance with applicable requirements in Austroads. TfNSW notes that the landscape plan shows planting adjacent to the new kerb line in Crown Street, however, is unclear on the species proposed and their impact on available sight distances.
- c) Insufficient information has been provided to enable TfNSW to assess whether the proposed outdoor dining area, that is located within the newly widened public domain along Crown Street as shown in the Landscape Architectural Drawings prepared by Land+Form, complies with applicable separation requirements from state roads (i.e. a minimum of 2.5 metres from the face of the kerb unless a TfNSW certified road barrier is agreed upon and installed) and to confirm that the proposed works will not adversely impact the Crown Street public domain.

TfNSW also notes inconsistencies between the Detailed Landscape Plan prepared by Land+Form (Drawing No. LD-DA101, Revision 1, dated 15.09.2025) and the Public Domain Concept Design prepared by S&G Consultants Pty Ltd. For example, the pedestrian crossing shown in the concept design is not reflected in the landscape plan. Furthermore, both the Environmental Impact Statement and the Traffic Impact Assessment are silent on the proposed outdoor dining along the Crown Street frontage.

Details on how the above have been addressed shall be provided.

3. Changes to traffic signals: TfNSW notes that modifications to existing traffic signals are proposed as part of the current SSD application. To enable assessment of the proposed changes, the following additional information is required:

- a) *Burelli Street, Kenny Street and Findlay Place signalised intersection:* TfNSW notes that the proposed light vehicle access to and from Burelli Street will necessitate alterations to the existing signalised intersection of Burelli Street, Kenny Street and Findlay Place. The documentation submitted with the current SSD application does not provide sufficient detail for TfNSW to confirm the full scope of works at this intersection, demonstrate that it can be designed and built in compliance with applicable requirements (e.g. Traffic Signal Design Guide, etc) and enable TfNSW to provide its in-principle approval to the works.

In addition to the above, the plans must clearly show:

- i) the easement required to allow TfNSW access for maintenance of all traffic signal related infrastructure;
- ii) details on how right turns from Burrelli Street into the development site will be prevented (refer to Point 8 for additional details); and
- iii) the location of all poles, lanterns, cabling, loop detectors and pedestrian/kerb ramps.

TfNSW also notes that the proposed pedestrian crossing width should be 3.6m wide in accordance with the TfNSW Traffic Signal Design Guide.

- b) *Atchison Street/Burelli Street intersection:* Clarification is required regarding the proposed changes to the Atchison Street/Burelli Street intersection. TfNSW notes that the Traffic Impact Assessment (prepared by Genesis Traffic, Job No. 24179, Version 5 dated 30.07.2025), references the upgrade works at this intersection, specifically, the removal of the existing slip lane on Atchison Street and its replacement with two full lanes. However, other submitted documentation, including the *Public Domain Concept Plan* prepared by S&G Consultants Pty Ltd, indicates that no upgrade works are proposed and instead shows only the repainting of the existing pedestrian crossing.

TfNSW considers that, given the expected increased pedestrian and cyclist activity generated by the development, the removal of the existing pedestrian crossing and installation of traffic signals would provide a safer and more accessible connection to Wollongong Train Station, while also mitigating potential road safety issues associated with the development.

For both a) and b) above, TfNSW requires a concept/strategic design for the identified works/upgrades to be prepared before the determination of the current SSD application. The strategic design provided shall address the requirements as detailed in the TfNSW *Strategic Design Requirements for DAs* fact sheet (refer to the following link - [Strategic Design Requirements for DAs Factsheet \(August 2024\)](#)). This will, in part, clarify the scope of works, demonstrate that a compliant design can be provided, and allow DPH&I, as the consent

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authority, to consider any environmental impacts of the works as part of their Part 4 assessment under the *Environmental Planning and Assessment Act 1979*.

4. Pedestrian connectivity: TfNSW notes that the previously approved plans under DA-2021/957 provided substantial pedestrian access through the site in both east/west and north/south directions, facilitated by the development site having similar ground level RLs at the south western and north eastern corners of the development site. While the currently submitted plans maintain a north/south pedestrian connection, the proposed design does not optimise east/west pedestrian movement through the site, which TfNSW believes will be significant, noting the location of the train station to the west and the Wollongong Central Business District to the east. TfNSW strongly supports improving east–west pedestrian permeability across the development.
5. SIDRA modelling: TfNSW requires the following information:
 - a) The electronic files for the SIDRA modelling that has been undertaken. This includes modelling for the removal of the pedestrian crossing and its replacement with signal infrastructure at the Atchison Street/Burelli Street intersection.
 - b) Details on how the base model has been calibrated with on-site observations (e.g. queue lengths, delays, etc) need to be provided.
 - c) Confirmation that the required information relating to the operation of existing signals (e.g. phasing, pedestrian times, etc) used in the SIDRA modelling has been obtained from TfNSW.
 - d) The modelling provided to show an exclusive pedestrian phase to prioritise pedestrians at the Burelli Street, Keira Street and Findlay Place signalised intersection. This is due to the nature of the development and to reduce delays for vehicles waiting to turn at Kenny Street. Similar arrangements are already in place at the Kiera and Burelli Street intersection.
 - e) Update the modelling so that the base year used is the date of opening of the proposed development, with the future/10 year scenario being the base year + 10 years.
 - f) Details on any SIDRA defaults that have been changed, along with supporting justification.
6. Service vehicle access: TfNSW notes that the submitted plans propose relocating the service vehicle access further to the west compared to the location approved under DA-2021/957. This change positions the access closer to the signalised intersection of Burelli Street, Kenny Street and Findlay Place. TfNSW does not support the relocation of the service vehicle access closer to the signalised intersection for the following reasons:
 - a) The proposed relocation would create additional conflict points and result in safety and efficiency issues for westbound traffic along Burelli Street, including bus operations.

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b) The proposed location does not comply with the requirements of the TfNSW *Traffic Signal Design Guideline – Section 2*, which stipulates that signalised mid-block marked pedestrian crossings must be located at least 30 metres from a side street. TfNSW classifies the proposed service vehicle access as a side street for the purpose of this requirement. Accordingly, TfNSW requests that the service vehicle access be repositioned to align with the location previously approved under DA-2021/957, with this amendment shown on updated plans.

7. Right turn restrictions: Right turns into the development from Burelli Street should be prevented to minimise adverse impacts on network efficiency, given the existing function of Burelli Street, which accommodates multiple bus routes as well as a bus stop adjacent to the site (southern side of Burelli Street).

TfNSW holds concerns that, without appropriate measures to prevent right turns from Burelli Street, the future development may adversely affect bus operations due to the existing bus stop on the southern side of the street, the constrained road environment, and the potential for traffic conflicts in this area.

8. Post box relocation: TfNSW notes the presence of two post boxes and an associated collection area within the Crown Street road reserve. The information provided, including the Public Domain Concept Design prepared by S&G does not identify the proposed relocation location for these post boxes or include written confirmation from Australia Post regarding their relocation and acceptance. Details on how the above have been addressed shall be provided.

9. Other comments:

- a) Roads Act 1993: At this time, TfNSW has not provided its ‘in principle’ concurrence under Section 138 of the *Roads Act 1993* for the works that are proposed and/or required within the state road reserve. In addition, TfNSW has not provided its required approval under Section 87 of the *Roads Act 1993* for the proposed changes to traffic signals. In principle, approval for both shall be obtained before the SSD application is determined.
- b) Swept paths: TfNSW notes that the swept path analysis for service vehicle access to Burelli Street (refer to Attachment 5 in the Traffic Impact Assessment prepared by Genesis Traffic, Job No. 24179, Version 5 dated 30.07.2025) demonstrates that service vehicles are unable to enter and exit the property simultaneously. This outcome is unacceptable, as it would require service vehicles to wait within the through lane of Burelli Street. Revised designs shall be submitted showing that the largest service vehicles can enter and exit the site simultaneously, maintaining all required clearances and appropriate design speeds.
- c) Largest vehicle size: Noting the size of the development, the mix of uses and the change of occupiers that will occur over time, further justification is required on why a swept path for a 17.5m semi-trailer has been used as opposed to a 19m semi-trailer.

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- d) Section 2.120 of State Environmental Planning Policy (Transport and Infrastructure) 2021:
The provisions of Section 2.120 (Impact of road noise or vibration on non-road development) of *State Environmental Planning Policy (Transport and Infrastructure) 2021* apply to the submitted application as the annual average daily traffic volume along this section of the Crown Street is more than 20,000 vehicles (refer to 'Traffic Volume Maps for Noise Assessment for Building on Land Adjacent to Busy Roads' - Map 18C).

As such, the developer will need to demonstrate to the satisfaction of the determining authority (DPH&I) that the SSD application can comply with provisions contained in Section 2.120 of *State Environmental Planning Policy (Transport and Infrastructure) 2021* specifically in relation to measures to ensure the required noise levels as detailed in Subclause 3 are not exceeded when the building is ready to be occupied.

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SSD application site