



# Stage 1 Visual Analysis

106, 120-122 Smith Street and 3A Charlotte Street, Wollongong

Submitted to Wollongong City Council  
on behalf of Urban Property Group

Prepared by Colliers Urban Planning

28 November 2025 | 2250978



**'Gura Bulga'**

Liz Belanjee Cameron

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



**'Dagura Buumarri'**

Liz Belanjee Cameron

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



**'Gadalung Djarri'**

Liz Belanjee Cameron

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

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

We pay our respects to their Elders past and present.

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

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# 1.0 Introduction

In response to release for public exhibition of the draft 'Flinders Street Precinct Urban Design Framework' (the draft UDF) The Smith Street Development Partnership (the applicant) are proposing to amend the height of the approved shop top housing development with infill affordable housing (the proposal) on land located at 106 & 120-122 Smith Street and 3A Charlotte Street, Wollongong (the site).

Pursuant to section 4.55(1A) of the Environmental Planning and Assessment Act 1979 (EP&A Act 1979), Colliers Urban Planning on behalf of the applicant has submitted a modification application (SSD-67895459 MOD4) to the NSW Department of Planning, Housing and Infrastructure (the Department) seeking approval for this proposal.

This view analysis supports this modification application by addressing relent view and visual impact matters.


# 2.0 The Site

The site is located at 106 & 120-122 Smith St and 3A Charlotte St, Wollongong within the Wollongong City Council Local Government Area (LGA) (refer below figure). It is 500m (approx.) north-west of Wollongong Central Shopping Centre and 800m (approx.) north of the Wollongong Railway Station.

It is located within the Flinders Street Precinct, the subject of the draft UDF.



 The Site

 NOT TO SCALE

*Figure 1*      *Approximate boundaries of the site*

Source: Colliers Urban Planning

## 3.0 Site Approval History

### 3.1 The Original Development Consent

Development consent SSD-67895459 was granted by the Minister of Planning and Public Spaces on 4 April 2025 for renewal of the site for the purposes of shop top housing development with infill affordable housing (refer below figure) comprising:

- Two 7 to 10-storey residential buildings with ground level retail/commercial uses
- 145 apartments (including 25 affordable housing apartments)
- Communal open space at podium and roof top level
- Two levels of above ground car parking with 183 car spaces
- Vehicular access from Smith Street and Charlotte Street with associated road upgrade works
- Publicly accessible through-site link and landscaping works.



*Figure 2* Artist impression of the approved development

Source: COX Architecture

## 3.2 The VIA

In response to the relevant SEARs (refer below), the development application for which development consent SSD-67895459 was granted was supported by a Visual Impact Assessment (VIA) prepared by Ethos Urban in collaboration with Rock Hunter and dated 8 May 2024.

**Table 1** SEARs issued for development consent SSD-67895459

Issue	Assessment Requirements	Documentation
7. Visual Impact	<p>Provide a visual analysis of the development from key viewpoints, including photomontages or perspectives showing the proposed and likely future development.</p> <p>Where the visual analysis has identified potential for significant visual impact, provide a visual impact assessment that addresses the impacts of the development on the existing catchment.</p>	<p>Visual Analysis</p> <p>Visual Impact Assessment</p>

In response to submissions, a revised VIA was prepared by Ethos Urban in collaboration with Rock Hunter and dated 26 November 2024.

The revised VIA concluded that subject to the recommended mitigation measures the proposal has acceptable visual and view loss impact for the following key reasons:

- Relative to what may be expected in the city centre with reference to permitted site height and FSR the proposal will not unduly obstruct significant views or views from the Flagstaff Hill lighthouse to the escarpment
- It will maintain existing linear views to the west along Smith Street
- Being for a high density residential, higher rise development, it is consistent with the key character intent of the surrounding precinct
- It will enhance the amenity of the site and surrounds
- It will not introduce new, non-characteristic or discordant or intrusive elements into the views available in the visual catchment
- Does not block or otherwise interrupt the existing view to Mt Keira from the intersection of the Princes Highway and Smith Street seen when exiting the city centre.

This conclusion was informed by a number of photos showing current views from selected key viewpoints in the surrounding public domain and photomontages showing the likely future view from the same viewpoints should the proposal be approved (refer figures below).



*Figure 3 View of the approved development from the Throsby Drive Overpass*

Source: Rock Hunter



*Figure 4 View of the approved development from the Prince Highway*

Source: Rock Hunter

### 3.3 The Departments Assessment

The Department assessment concluded that the proposal is acceptable as:

- 'it would support State government priorities to deliver well-located housing as it would deliver 120 market and 25 affordable housing apartments in an accessible location
- It provides shop top housing which is permissible with consent and consistent with the objectives of the Wollongong Local Environmental Plan 2009 E3 Productivity Support zoning
- It provides a bulk and scale which is compatible with the envisaged character of the area and an appropriate built-form relationship to adjoining developments
- It would not result in unreasonable overshadowing, visual, privacy, traffic or other amenity impacts on adjoining development or the public domain
- It would provide for 305 construction jobs and 30 operational jobs'.

### 3.4 Modification 1

Development consent SSDA-67895459-Mod-1 was granted by the Minister of Planning and Public Spaces on 31 July 2025. As stated by the Department, this modification involved the following:

- 'Loading dock modification, minor internal and external modifications'.

### 3.5 Modification 2

Development application SSD-67895459-Mod-2 is currently under assessment by the Department. As stated by the Department, this modification involved the following:

- 'Increase the 7-storey portion of Building 2 to 8 storeys and increase the total number of apartments from 145 to 150'.

### 3.6 Modification 3

Development application SSD-67895459-Mod-3 is currently under assessment by the Department. As stated by the Department, this modification involved the following:

- 'Minor internal and external alterations and additions, including amendments to facade materiality'.

## 4.0 The Proposal

The proposal is detailed in the supporting, separate 'Modification Report' prepared by Colliers Urban Planning. For the purposes of this report, the most relevant part of the modification is a proposed increase in the height on part of the northern building by 3 storeys.

# 5.0 Planning Framework

## 5.1 SEARs

The SEARs issued for development consent SSD-67895459 are shown in the below table. As can be seen, this requires consideration of visual impact. This report satisfies this requirement by enabling the Department to consider visual impact relevant to the scope of this modification application.

**Table 2** SEARs issued for development consent SSD-67895459

Issue	Assessment Requirements	Documentation
7. Visual Impact	Provide a visual analysis of the development from key viewpoints, including photomontages or perspectives showing the proposed and likely future development.  Where the visual analysis has identified potential for significant visual impact, provide a visual impact assessment that addresses the impacts of the development on the existing catchment.	Visual Analysis Visual Impact Assessment

## 5.2 Environmental Planning and Assessment Act 1979

Section 4.55(1A) of the Environmental Planning and Assessment Act 1979 (EP&A Act 1979) states that a consent authority may, on application being made by the applicant or any other person entitled to act on a consent granted by the consent authority and subject to and in accordance with the Environmental Planning & Assessment Regulation 2021 (EP&A Regulations), modify the consent if it is satisfied that the proposed development to which the consent as modified relates is of minimal environmental impact, and is substantially the same development as the development for which was originally granted.

# 6.0 Visual Analysis

## 6.1 The Draft UDF

On 27 October 2025, Wollongong City Council (council) resolved to endorse the draft UDF for public exhibition. Exhibition commenced on 3 November and is scheduled to conclude on 15 December 2025.

## 6.2 Intent of the Draft UDF

Due to a range of factors, including its strategic location near North Wollongong Station and the Wollongong CBD, the precinct is considered to have potential to help deliver a greater amount of jobs and homes. The purpose of the draft UDF is to guide future growth in the precinct to unlock this potential. As can be seen in the following figure, the draft UDF seeks considerable growth for the precinct.



Figure 5 The Flinders Street Precinct in the context of Wollongong



**Figure 6** *Indicative model of development enabled by the draft UDF*

Source: Architectus

### 6.3 Structure of the draft UDF

The draft UDF guides this future growth in accordance with a range of parts, including a vision, design principles, position statements, structure plan, and sub-precincts.

### 6.4 Vision of the draft UDF

The vision seeks to position the precinct as a key arrival boulevard that contains a mix of uses is as follows:

- ‘The Flinders Street Precinct is the key arrival boulevard into the Wollongong City Centre. It is a place where a mix of businesses can thrive, while also supporting other uses such as apartment living, within a walk and cycle of North Wollongong Station, the city centre and the beach’.

It also establishes an intent for a greater scale of development:

- ‘A mixed-use corridor of mid to high rise development will define Flinders Street, with active commercial uses fronting the street, tree lined setbacks, and apartments above. Gateway development at the southern end of Flinders Street creates a mixed use attractor and provides a transition to the city centre character further south’.

Other parts of the vision seek responsiveness to context. Of particular relevance to this visual analysis is the introduction of aspirations for views:

- ‘The Flinders Street Precinct responds to its unique context along Fairy Creek and with Mount Keira, Mount Kembla and the escarpment overlooking, acknowledging Aboriginal cultural and spiritual connections’.

As can be seen and is recognised in the draft UDF, this establishes a tension between enabling development in accordance with the precinct’s potential to support jobs and homes, and protecting views. The tension between development and views continues throughout the design principles, position statements, and is clearly shown in Figure 10 ‘Structure plan’ (refer below).

## 6.5 Structure Plan

The structure plan introduces the concept of view corridor originating from the centre of Smith Street slightly west of its intersection with Princes Highway and Keira Street traversing, and therefore impacting, the block bound by Throsby Drive to the north, Princes Highway to the east, Smith Street to the south, and the railway to the west.

However, this block is also included in the MU1 Mixed Use zone and E3 Productivity Support zone, and partly supports:

- 'Key sites'
- 'Key activity node'
- 'Key marker buildings.'

The view corridor traverses parts of the key sites, and key activity node.'

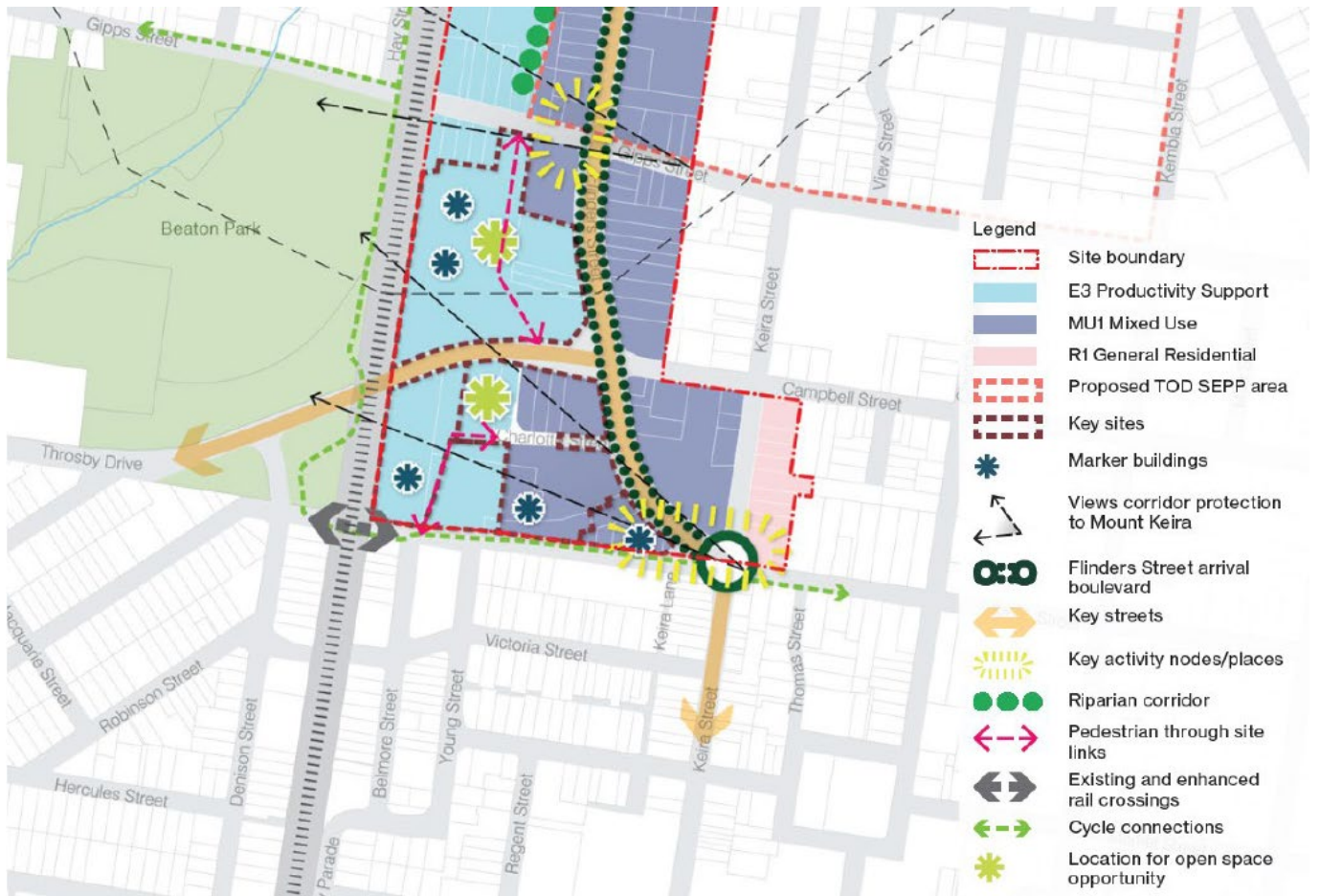


Figure 7 Draft UDF Structure Plan

## 6.6 Building, Height and Scale

This tension is also reflected in the key principles and controls for section 3.2 'Building height and scale' (page 27):

- 'Ensure that built form height and scale responds to the nominated view protection corridors to Mount Keira (see 3.4 view Protection for further detail)
- Support marker towers across the precinct, ranging between 12-15 storeys to act as key buildings that help to anchor and distinguish the precinct.
- Provide increased height along Smith Street of up to 15 storeys, to integrate with the existing height corridor and transition to the city centre context.
- Ensure that areas with increased height provide well-separated tower forms that maximise solar and visual amenity, and opportunities for deep soil and landscaping at ground'.

- Consistent with its preferred role and character under the draft UDF, supporting Figure 14 'Approach to building heights map' introduces the concept of a 'height corridor' along Smith Street.



Figure 8 Approach to building heights map

## 6.7 View Protection

Section 3.4 'View protection' provides further detail on views. This introduces the concept of 'building height and upper-level setback requirements' to ensure that key view corridors are retained'. This impacts a small part of the site.

While the draft UDF is not supported by proposed amendments to the Wollongong Local Environmental Plan 2009 (the LEP) or Wollongong Development Control Plan 2009 (the DCP) to enshrine their introduction, the suggested new maximum building height in the area covered by the view corridor ranges between 24m – 34m. To protect views, the section also encourages slender buildings, and building separation:

- 'Encourage slender buildings and appropriate separation to ensure that intermittent views to Mount Keira, Mount Kembla and the escarpment can be provided between buildings'.

Enabling intermittent views of high value landscape elements such as these are common planning and design techniques in areas planned to accommodate significant change, including taller buildings. In particular, it avoids sterilising or considerably reducing the capability of land to help deliver on new jobs and homes by striking a balance between these outcomes and contextually appropriate development that is responsive to these elements. Furthermore, it is a more balanced tactic for enabling views obtained in a more dynamic way from roads such as Smith Street. This is in contrast to views obtained from important and designated locations in the public domain supported by infrastructure that assists in their static appreciation. In the Wollongong context, this includes views obtained from Flagstaff Hill.

## 6.8 Flinders Street South Sub-Precinct

The site is included in the Flinders Street South sub-precinct. The statement of desired future character for this sub-precinct is as follows:

- 'The Flinders Street South sub-precinct reinforces the southern mixed-use node within the precinct. The sub-precinct provides significant commercial and housing opportunities close to Wollongong City Centre. Anchored by the Collegians Club, the sub-precinct provides retail, and entertainment uses away from the busy Flinders Street and supports destination offerings that attract people to the precinct. Variation in building height protects views towards Mount Keira as you exit Wollongong City Centre'.

This statement confirms the intent for 'significant commercial and housing opportunities. It also introduces the concept of 'destination offerings', which infers development of significance. The statement also confirms the role of the sub-precinct as a marker for existing the Wollongong City Centre.

Further guidance that supports development of scale includes:

- 'Rezone the eastern portion of the sub-precinct to M1 Mixed Use reinforcing the mixed use character of the Flinders Street corridor
- Create a height corridor along Smith Street with a 40m base height, integrating with adjacent controls to the south and reinforcing the transition to a city centre character
- Enable additional height at the corner of Flinders Street and Throsby Drive with a base height of 32m
- Support a slender marker tower at the corner of Flinders and Smith Streets, signifying the southern entry point into the Flinders Street Precinct and transition to the city centre.
- Reinforce the mixed use node at the intersection of Flinders, Smith and Keira Streets and support a mix of retail activation that attracts people to the precinct.
- Nominate the sub-precinct as a key site that can deliver high quality development including activation opportunities, through site links and open space'.

Further guidance for view protection is as follows:

- 'Protect the view corridor to Mount Keira from Smith Street, near the intersection with Keira and Flinders Street
- Built form directly within the view corridor e.g. a portion of the Collegian Club site, and land at the northwest corner of the sub-precinct along Throsby Drive, is limited to 24m (approximately 6 storeys) to retain views to Mount Keira
- Development at the corner of Flinders and Smith Street to be slender and setback to ensure the view corridor is maintained
- Ensure that the visual bulk and scale of new development is minimised within and adjacent to key view corridors to Mount Keira and Mount Kembla. Provide well-separated and slender built form. Development proposals to provide a visual impact assessment'.

As noted above, the draft UDF recommends a height corridor of along Smith Street with a 40m base height.

It is however further noted that Figure 37 'Flinders Street South sub-precinct - Recommended controls' shows a lower base height of 32m. While this is greater than the current LEP height of 24m (NSW Planning Portal, accessed 25 November 2025). This table shows that application of the view protection provisions results in a reduction of base height from 32m to 24m for that part of the sub-precinct impacted by the view corridor.

The following figure shows indicative built form enabled by the draft UDF for the sub-precinct. In addition to greater scale of development, including height, the following elements can clearly be seen:

- The approved scheme (in light yellow)
- Slender marker tower at the corner of Flinders and Smith Streets
- 'Location for open space' at the end of Charlotte Street and a corresponding absence of built form at the referenced north-west corner of the sub-precinct intended to provide for views to Mt Keira.



*Figure 9 Flinders Street South sub-precinct - Indicative built from*

# 7.0 Visual Analysis

As part of this visual analysis, detailed study of the Smith Street view corridor was undertaken.

## 7.1 The importance of Mt Keira

This was informed by the Appendix A 'Analysis' of the draft UDF. Review of the appendix has shown the importance of Mount Keira to the Wodi Wodi People, and in particular its connection between the escarpment and the sea (refer below figure).



*Figure 10 View from the summit of Mt Keira showing its connection between the escarpment and the sea*

We also note the appendix addressing the possibilities renewal of the precinct may provide for the future:

- 'The Flinders Street Precinct holds particular significance for the Wodi Wodi community, whose ancestral ties to the land offer a unique lens through which the zoning decisions should be evaluated. Maintaining the E3 Productivity Support Zoning could preserve the connection to the land's historical and cultural narratives, ensuring that Aboriginal values are embedded in its future use. Conversely, transitioning parts of the precinct to mixed or residential zoning could accommodate evolving urban needs while still respecting and integrating Aboriginal heritage through thoughtful planning and community consultation'.

## 7.2 The Smith Street View Corridor

Section A.8 'Topography and views' identifies that the Smith Street view corridor is 'important to retain and celebrate'. It provides further detail as follows:

- The intersection at Flinders, Smith and Keira Streets is a key junction signalling the transition into the Wollongong City Centre. Smith Street is also a key east-west connection for vehicles, pedestrians and cyclists.
- Mount Keira can be seen when travelling north along Flinders Street and is a key visual marker exiting Wollongong. Currently a wide view towards Mount Keira can be appreciated from this junction, however recent proposals on sites along the railway corridor partially blocks the escarpment. Significantly, future development on sites along Flinders Street between Throsby Drive and Smith Street may have a considerable impact on this view'.

The extent and nature of the current view is shown in the below Google Street View contained in the draft UDF.



Figure 11 Existing view to Mt Keira

### 7.3 Tension between Development and Views

Continuing the theme of the tension between development and views, as is evidenced in Figure 73 'Development context map' the view corridor traverses land that is in the process of being considered for renewal for greater height. This is evidenced by the figures below.



Figure 12 Proposal for 73-75 Gipps Street and 60-74 Flinders Street, Wollongong seeking building heights between 43-80m currently under review

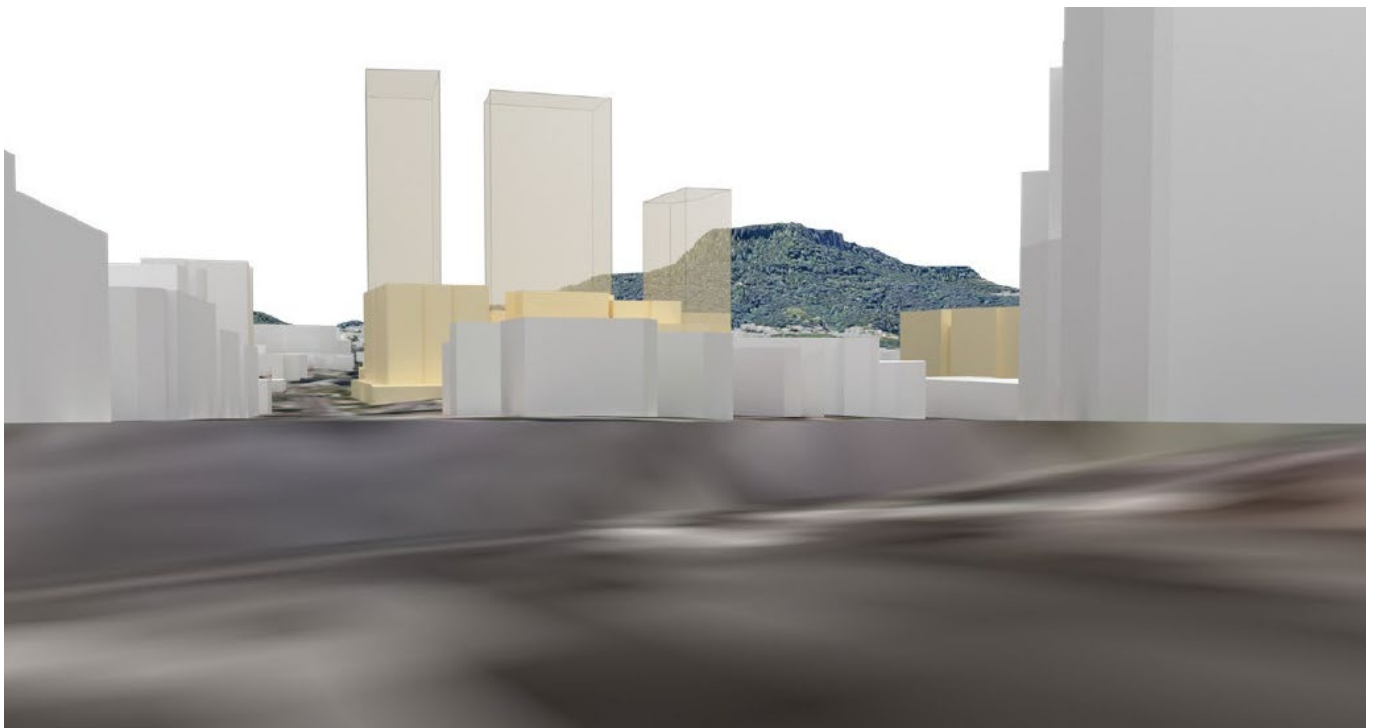


Figure 13 Potential future view (includes DAs/SSDs approved or under assessment, show in yellow)

## 7.4 The Response of the Draft UDF

The below figure shows how the draft UDF proposes to treat the sub-precinct. As can be seen, considerable scale of development including taller buildings is enabled. The numbers 26 in the figure denote where reduced heights of 24m (approx. 6 storeys) may be appropriate to preserve views to Mt Keira.

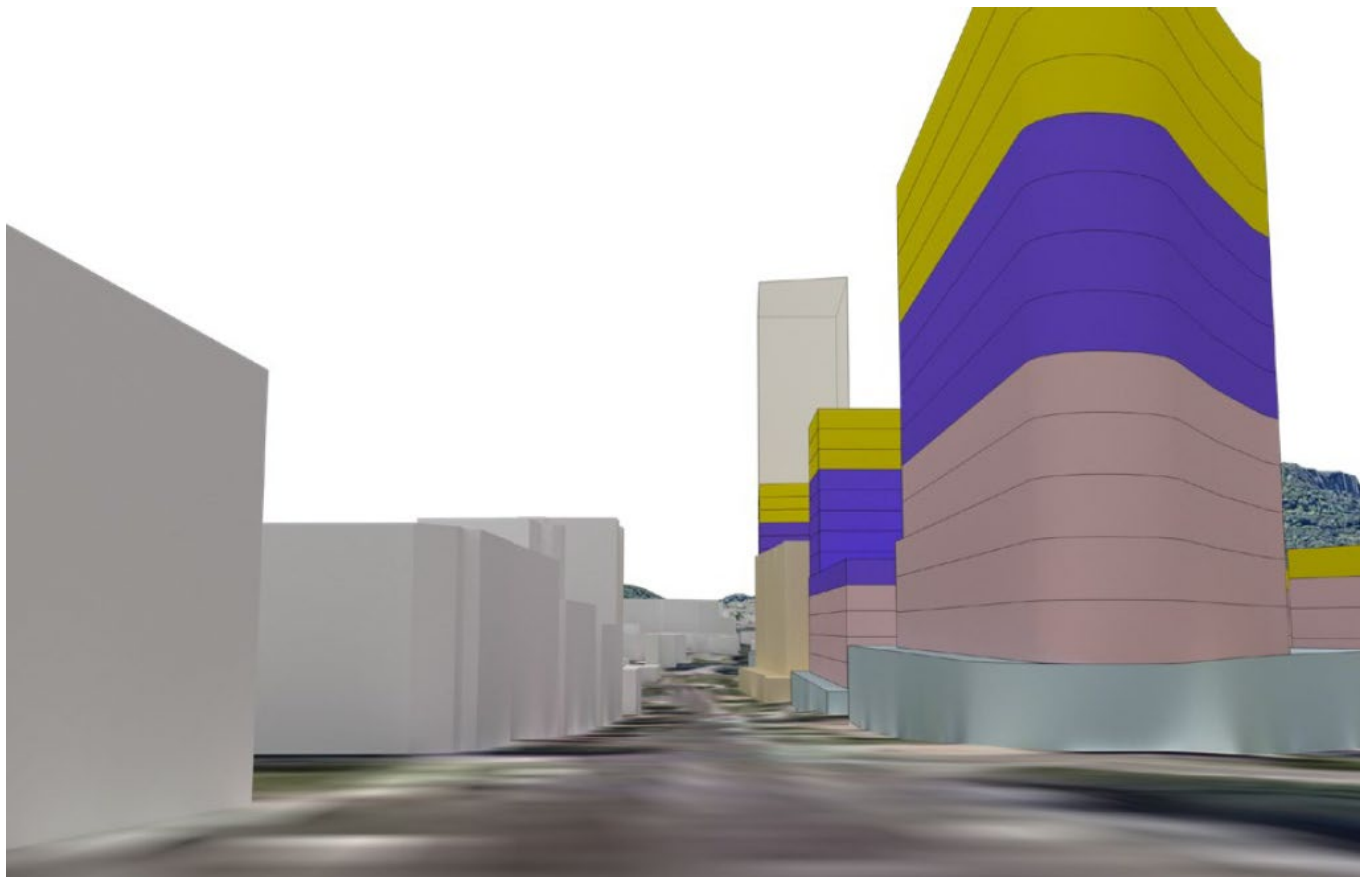


Figure 14 View down the western part of Smith Street under the draft UDF



Figure 15 View from the Smith Street viewpoint under the draft UDF

## 7.5 The Impact of Viewpoint Location

Comparison of the view down the western part of Smith Street under the draft UDF and the view from the Smith Street viewpoint under the draft UDF shows how adjustment in viewing location can have a significant impact on the extent and nature of the view to Mt Keira.

## 7.6 The Location of the Smith Street Viewpoint

Informed by this, further consideration was given to the context of the intersection of Flinders/Smith/ Keira Street. Firstly, by reference to the above figures, it is noted that the viewpoint is located in the centre of Smith Street west of its intersection with the Princes Highway. As is shown in the below figure, Smith Street in this location is a one-way road. As the travel direction is eastbound, people in vehicles will not see this view. This is distinct from the two-way nature of Gipps Street, and Bourke Street, which are the other two streets subject of the proposed view corridors.



*Figure 16 Intersection of Princes Highway and Smith Street*

Source: Nearmap

On this basis, it is presumed that the viewpoint is a proxy for the view which may be obtained heading northbound on the Princes Highway existing the Wollongong City Centre. In this location Princes Highway is a busy road. As such and in accordance with the principles of VIA, the interest or attention in views and visual amenity of most people who will ordinarily be exposed to the view is likely to be relatively low.

In addition, with reference to the below figure, the triangular parcel of land in the public domain at the intersection of the Princes Highway and Smith Street and in the direct line of sight of the view corridor is occupied by a large, well established, spreading, healthy tree. While noting it is deciduous, this significantly screens the view during periods when the tree is in leaf and filters the view at other times of the year.



*Figure 17 Intersection of Princes Highway and Smith Street showing the well-established tree in the public domain*

## 7.7 The Adjoining Public Space

Conversely, as is shown in the below figure, renewal of the site at the north-east corner of the Princes Highway, Smith Street and Keira Street has created a generous sized and high quality public space that is aligned with a signalised crossing of the Princes Highway, and a marked pedestrian crossing of Keira Street.



*Figure 18 Aerial photograph of the new public space at the north-east corner of the Princes Highway, Smith Street and Keira Street*

In terms of VIA practice, it is not only the nature and extent of views that is a key consideration, but also the characteristics of the viewing location. Viewing location that are in the public domain, well used, and are accessible by pedestrians typically have greater weight than those obtained from roads. As such, this location is considered to have greater weighting in a VIA context than the current viewpoint. It is also considered sufficiently proximate to the current viewpoint to reasonably represent the general location.

## 7.8 Views to Mt Keira from this Public Space

As can be seen in the figures below, a generous view of Mt Keira is obtained from this location. While noting that most people in vehicles will have reduced interest in views and visual amenity, it is also noted that this view is directly aligned with the line of sight obtained when travelling north on the Princes Highway.



*Figure 19 Mt Keira seen in the background of a view from the adjoining public space*



*Figure 20 View of Mt Keira seen from the adjoining part of the Princes Highway*

As such, consideration was given to the nature and extent of views obtained from this viewpoint as marked as 'C' in the below figure.



*Figure 21 Location of the viewpoint located in the adjoining public space*

The figure below prepared by Rock Hunter shows:

- The approved consent in outline
- The proposed modification in colour
- The draft UDF view corridor in solid grey
- The southern extent of the view of Mt Keira from this location as a green line
- An alternative view corridor as a pink line.

As can be seen, the southern extent of the view of Mt Keira from this location denoted as a green line does not impact the proposed modification. Furthermore, while there is minimal difference in the area between the draft UDF view corridor in solid grey and the alternative view corridor as a pink line, the alternative view corridor is less impactful on the proposed modification.



Figure 22 Comparison of Mt Keira view corridors

### 7.9 The Impact of the Proposed Modification on this View

To test the view and visual impact of the proposed modification, Rock Hunter prepared the photomontage shown in the below figure. This clearly shows the proposed modification located separate to, and not impacting, the crown of Mt Keira. As such, the proposed modification is consistent with the intent of the draft UDF, and does not have a significant, adverse impact on visibility of Mt Keira from this general location.



Figure 23 The proposal as seen from Viewpoint C

# 8.0 Discussion

## 8.1 Substantially the Same

As is outlined in the separate, supporting Modification Report prepared by Colliers Urban Planning, the proposed modification is for development that is substantially the same development as that for which consent was originally granted.

## 8.2 Minimal Environmental Impact

This visual analysis has considered the potential visual impact of the proposal.

The following grounds support the proposed modification having minimal environmental impact:

- It is located to the rear of the site in relation to Smith Street
- It is limited in physical extent height and overall scale compared to the development for which consent was originally granted
- It will be in large part screened from view from other parts of the public domain by future development enabled by the LEP and the draft UDF.

These support the findings of the original SSDA when determining acceptability of visual impact:

- 'Relative to what may be expected in the city centre with reference to permitted site height and FSR the proposal will not unduly obstruct significant views or views from the Flagstaff Hill lighthouse to the escarpment
- It will maintain existing linear views to the west along Smith Street
- Being for a high density residential, higher rise development, its is consistent with the key character intent of the surrounding precinct
- It will enhance the amenity of the site and surrounds
- It will not introduce new, non-characteristic or discordant or intrusive elements into the views available in the visual catchment'.

An original ground for supporting the proposal from a view and visual impact perspective was the following:

- 'The proposal does not block or otherwise interrupt the existing view to Mt Keira from the intersection of the Princes Highway and Smith Street seen when exiting the city centre'.

Given the release of the draft UDF, this is the only issue warranting further, refreshed consideration. This visual analysis provides this consideration.

As has been found, this visual analysis makes the case that an alternative view adjoining and slightly to the north of the current viewpoint aligned with public space should be given greater weight from a VIA perspective in the assessment of the proposed modification's impacts. As is shown in the visual analysis, the proposed modification is located separate to, and will not impact, the crown of Mt Keira when seen from the viewpoint

As such, the proposed modification is consistent with the intent of the draft UDF, and does not have a significant, adverse impact on visibility of Mt Keira from this general location.

# Conclusion

It is the conclusion of this visual analysis that:

- The proposed modification is of minimal environmental impact.
- The proposed modification is substantially the same development as the development for which the consent was granted.

It is also the conclusion of this visual analysis that the proposed modification does not generate new or additional impacts that would give grounds to not support the proposal in accordance with the Department's original conclusions as follows:

- It would support State government priorities to deliver well-located housing as it would deliver 120 market and 25 affordable housing apartments in an accessible location
- It provides shop top housing which is permissible with consent and consistent with the objectives of the Wollongong Local Environmental Plan 2009 E3 Productivity Support zoning
- It provides a bulk and scale which is compatible with the envisaged character of the area and an appropriate built-form relationship to adjoining developments
- It would not result in unreasonable overshadowing, visual, privacy, traffic or other amenity impacts on adjoining development or the public domain
- It would provide for 305 construction jobs and 30 operational jobs.

As such, the proposed modification can be supported on view and visual impact grounds.