



ENVIRONMENTAL IMPACT STATEMENT

Early Works for Shop Top Housing Development

357-363 Crown Street and 2-4 Gladstone Avenue, Wollongong (SSD-97973958)

Prepared for: Wollongong Developments No 5 Pty Ltd

REF: M220250

DATE: 26 March 2026





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Appendix D	Survey Plan	GeoSurv
Appendix E	Historical Archaeological Statement	Sustainable Heritage
Appendix F	Construction Noise and Vibration Management Plan	Acoustic Logic
Appendix G	Construction Traffic Management Plan	Genesis Traffic
Appendix H	Aboriginal Impact Assessment Report	Seasoned Tree Consulting
Appendix I	Detailed Site Investigation	EI Australia
Appendix J	Remedial Action Plan	EI Australia
Appendix K1	Flooding Desktop Report	S&G Consulting
Appendix K2	Integrated Water Plan	S&G Consulting
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Appendix L	Geotechnical Investigation	Foundation Earth Sciences
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Appendix O	Statutory Compliance Table	Planning Ingenuity
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Appendix T	List of Mitigation Measures	Planning Ingenuity
Appendix U	Hydrogeological Assessment	Foundation Earth Sciences
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Signed Declaration

Project Details

Project Name	Early works for Crown Street Shop Top Housing
Application Number	SSD-97973958
Address of land in respect of which the development application is made	357-359 Crown Street Wollongong 363 Crown Street Wollongong 2 Gladstone Avenue Wollongong 4 Gladstone Avenue Wollongong

Applicant details

Applicant name	Wollongong Developments No 5 Pty Ltd
Applicant address	102 Bonds Road, Riverwood NSW 2210

Details of people by whom this EIS was prepared

Names and professional qualifications	Troy Loveday Principal Planner Bachelor of Arts (University of Sydney) Master of Urban and Regional Planning (University of Sydney)
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Declaration by Registered Environmental Assessment Practitioner (REAP)

Name	Nadine Page
Registration number	83042
Organisation registered with	Planning Institute of Australia

Declaration

The undersigned declares that this EIS:

- has been prepared in accordance with the Environmental Planning and Assessment Regulation 2021;
- contains all available information relevant to the environmental assessment of the development to which the EIS relates;
- does not contain information that is false or misleading;
- contains the information required under the Registered Environmental Assessment Practitioner Guidelines;
- addresses the Planning Secretary's Environmental Assessment Requirements (SEARs) for the Project;
- identifies and addresses the relevant statutory requirements for the Project, including any relevant matters for consideration in environmental planning instruments;
- has been prepared having regard to the Department's State Significant Development Guidelines – Preparing an Environmental Impact Statement;
- contains a simple and easy to understand summary of the Project as a whole, having regard to the economic, environmental and social impacts of the Project and the principles of ecologically sustainable development;
- contains a consolidated description of the Project in a single chapter of the EIS;
- contains an accurate summary of the findings of any community engagement; and
- contains an accurate summary of the detailed technical assessment of the impacts of the Project as a whole.

Signatures



BTP (Hons) UNSW Registered Planner PLUS (EIA)

Date	10 March 2026
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Executive Summary

Introduction

This Environmental Impact Statement (EIS) has been prepared on behalf of Wollongong Developments No 5 Pty Ltd (the Applicant) in support of a State Significant Development Application (SSD) identified as SSD-97973958. The EIS is submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI) for proposed Early Works associated with a future Shop Top Housing development with concurrent rezoning, subject to a separate SSDA (SSD-84127221) herein referred to as the 'Main Works SSDA'. Both applications are being proposed as Amending Development Applications to the approved DA-2023/156 (**Appendix V**).

The Early Works include bulk earthworks and construction of a pile shoring wall of areas beyond that approved by DA-2023/156 at No 357-363 Crown Street and Nos. 2-4 Gladstone Avenue, Wollongong (the Site).

The site was declared State Significant Development (SSD) pursuant to *State Significant Declaration Order (No 5) 2025* (Order) dated 14 April 2025. The Order declares development specified in EOI application 236817 dated 5 February 2025, including development for the purposes of *Demolition of existing buildings and construction of a mixed use development comprising shop top housing with a mix of residential dwellings (including the provision of affordable dwellings) and ground level retail with basement carparking. Retention of heritage-listed Fig tree in communal open space* at the Site, as SSD. As the proposed Early Works are contained within the scope of the works the subject of the Order, this application constitutes SSD.

On 12 November 2025, DPHI issued Secretary's Environmental Assessment Requirements (SEARs) for Early Works, described as "*Early works for Shop Top Housing Development*". This EIS has been prepared in response to the SEARs.

The Applicant has engaged with Wollongong City Council, Transport for NSW and Heritage NSW through the preparation of this application and will continue to do so following lodgement.

The Site

The Site comprises four land parcels that are located on the south-western corner of Crown Street and Gladstone Avenue, Wollongong. The site has an area of 6,514m². It has an irregular shape, has a sloping topography and has been cleared of all previous structures. A heritage-listed Moreton Bay Fig tree occupies the site's south-western corner. The site currently has vehicle access from Crown Street and Gladstone Avenue.

The site is located within the Wollongong Local Government Area (LGA) and is approximately 100m west of the Wollongong railway station and within walking distance of several bus stops serving neighbouring suburbs.

Proposal Overview

The SSDA is lodged as an Amending DA to DA-2023/156 to enable Early Works for a future Shop Top Housing Development (also an Amending DA to DA-2023/156).

A detailed description of the proposal is provided under Section 3 of this EIS. The proposal will be undertaken in accordance with plans prepared by *BKA Architecture* (**Appendix C**).

The early works provide for a new basement level and extend the existing lower ground level further west to accommodate the additional car parking and other building services arising from the proposed Main Works SSDA.

Relationship to Existing Development Consent

Consent was granted to DA-2023/156 by the Southern Regional Planning Panel in December 2024 for the construction of a Shop Top Housing Development on the site involving the following:





“Mixed use – demolition of existing structures, construction of a 19 storey shop-top housing development, including car parking, associated earthworks and landscaping”.

The consent provided approval for the following development on the Site:

- Demolition,
- Bulk excavation,
- Construction of a 19 storey shop-top housing development, with basement carparking,
- Landscaping works including retention of the heritage-listed tree,
- Public Domain works including restoration of the kerb and gutter, footpath paving, street trees and street furniture.

Environmental Impacts and Mitigation Measures

This EIS provides an assessment of the proposal's environmental impacts in accordance with the SEARs, including the key issues such as traffic, noise, waste and heritage. The proposed measures to manage and minimise potential impacts arising from the development.

The EIS confirms that the proposal will not give rise to unacceptable environmental impacts and is worthy of approval. A number of specialist technical reports have been included with the EIS to inform the analysis of the proposal. The list of mitigation measures are provided in this EIS (**Appendix T**).

Conclusion

The EIS has considered all relevant biophysical, economic and social considerations and having regard to the outcome of this assessment, found the undertaking of the proposed development to be justified for the following reasons:

- The Early Works will facilitate the redevelopment of the Site for new housing and affordable housing, with ground level retail areas to deliver important social and economic benefits to the community by contributing to housing diversity;
- The Early Works will facilitate the delivery of well-located homes, including affordable rental housing;
- The Early Works will facilitate a future development that is aligned with the State Government's strategic approach to deliver housing in well-located areas, by facilitating the delivery of new homes approximately 100m walking distance from Wollongong railway station.
- The Early Works will facilitate a development that will be direct response to the strategic vision and objectives for the delivery of housing supply, included in the National Housing Accord 2022, Housing 2041, as well as the Illawarra- Shoalhaven Regional Plan.
- The Early Works will maintain and support the preservation of the heritage-listed Moreton Bay Fig tree on the site.
- The Early Works will expedite construction on the site and in turn achieve the delivery of critical housing within the Housing Accord period which is the intent of the Housing Delivery Authority declaration.

In conclusion, the proposal is considered to be in the public interest and will not result in any unacceptable social, economic or environmental impacts that cannot be appropriately managed through the identified mitigation measures that are listed in **Appendix T** of this EIS.



1. Introduction

This Environmental Impact Statement (EIS) has been prepared on behalf of *Wollongong Developments No 5 Pty Ltd* (the Applicant) in support of a State Significant Development Application (SSDA) identified as SSD-97973958. The EIS is submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI) for proposed Early Works associated with a future mixed-use development with concurrent rezoning, subject to a separate SSD-84127221.

The Early Works are limited to bulk excavation and the construction of piled shoring on land at 357-363 Crown Street and 2-4 Gladstone Avenue, Wollongong (the Site).

The site was declared State Significant Development (SSD) pursuant to *State Significant Development Declaration Order (No 5) 2025* (Order) dated 14 April 2025. The Order declares development specified in EOI application 236817 dated 5 February 2025, including development for the purposes of *Demolition of existing buildings and construction of a mixed-use development comprising shop top housing with a mix of residential dwellings (including the provision of affordable dwellings) and ground level retail with basement carparking. Retention of heritage-listed Fig tree in communal open space* at the Site, as identified in clause 4(1)(b), is SSD. As the proposed Early Works are contained within the scope of works the subject of the Order, this application constitutes SSD.

On 12 November 2025, DPHI issued Secretary's Environmental Assessment Requirements (SEARs) for Early Works, described as "*Early works for Shop Top Housing Development*". This EIS has been prepared in response to the SEARs.

The Applicant has engaged with Wollongong City Council through the preparation of this application and, will continue to do so, through preparation of the subsequent Main Works SSD and following lodgement.

This EIS is based on the Architectural Drawings prepared by *BJA Architecture* (see **Annexure D**) and other supporting technical information.

This EIS has been prepared in accordance with the requirements of Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), section 175 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) and the SEARs issued. A SEARs compliance table is provided at **Annexure B** that identifies where the SEARs have been addressed in the EIS. This EIS should be read in conjunction with the supporting information and plans attached to and accompanying this document.

1.1 THE APPLICANT

The Applicant's details are presented in **Table 1** below.

Table 1 Applicant Details	
Applicant	<i>Wollongong Developments No 5 Pty Ltd</i>
Address	<i>102 Bonds Road Riverwood NSW</i>
ABN	30 672 679 024



1.2 OVERVIEW OF PROPOSED DEVELOPMENT

This SSDA seeks consent for Early Works for the future mixed-use development. Specifically, this SSDA seeks approval for the Early Works identified below that are consistent with the development as described within the request for SEARs:

- Bulk excavation for future basement; and
- Construction and anchoring of piled shoring wall and capping beam;

The above is proposed to be carried out concurrently with the bulk earthworks approved under DA-2023/156.

The proposal will be undertaken in accordance with the Architectural Drawings prepared by *BJA Architecture* (**Annexure D**).

The Early Works will be undertaken within the following hours:

- Monday to Friday: 7:00am to 5:00pm
- Saturday: 7:00am to 3:00pm
- Sunday and Public Holidays: No work

1.3 OBJECTIVES OF THE DEVELOPMENT

The objectives of the proposed development are to:

- Facilitate the early works at the site to enable future development (subject to separate SSD) for Shop Top Housing development;
- Facilitate expedited delivery of housing within the Housing Accord period by allowing enabling works to commence (as an Amending DA to DA-2023/156) prior to consent to the Main Works project.

1.4 BACKGROUND

1.4.1 Prior Approvals

Development consent was granted by the Southern Regional Planning Panel (SRPP) on 3 December 2024 (DA-2023/156) for a *“Mixed use – demolition of existing structures, construction of a 19 storey shop-top housing development, including car parking, associated earthworks and landscaping”*. Refer to **Appendix V**.

The consent provided approval for:

- Demolition,
- Bulk excavation,
- Construction of a 19-storey shop-top housing development, with basement carparking,
- Landscaping works including retention of the heritage-listed tree,
- Public Domain works including restoration of the kerb and gutter, footpath paving, street trees and street furniture.

1.4.2 Related Development

This Early Works SSDA will precede the future lodgement of SSD-84127221 (Main Works SSDA), also an amending DA to DA-2023/156. The Main Works SSDA, also includes a concurrent rezoning request. The Main



Works SSDA will seek consent for development of buildings on the four parcels to support a future mixed-use development on the site.

The key objectives of the Main Works SSDA are to:

- Provide for additional housing supply close to the Wollongong railway station and services,
- Provide new affordable housing dwellings in close proximity to the Wollongong city centre,
- Retain the site's contribution to employment uses providing retail and commercial uses, and
- Support active transport use within the Wollongong city centre.

1.4.3 Amending DA Mechanism

Section 4.17 of the EP&A Act and section 117 of the EP&A Regulation provides the mechanism for an amending development application (Amending DA). A development application for alterations and additions is most appropriate and this Amending DA is a suitable mechanism to amend the approved plans.

This process is able to occur in accordance with section 4.17(1)(b) of the Act which provides:

4.17 Imposition of conditions

(1) Conditions—generally

A condition of development consent may be imposed if—

- (b) it requires the modification or surrender of a consent granted under this Act or a right conferred by Division 4.11 in relation to the land to which the development application relates,*

The procedural aspects of the amendment are as follows:

- Lodgement of 'Amending DA' or alterations and additions DA (being this application),
- Assessment and granting of consent with a condition imposed to the effect of '*Development consent approved under DA-2023/156 is modified to reflect the revised plans and other amended floor plans under this DA*',
- The prior consent DA-2023/156 (at **Appendix V**) is then modified to reflect the current amendments and the proposal can proceed. This may include amended and/or additional conditions that relate to the early works as proposed by this application (additional earthworks and shoring up), including mitigation measures at **Appendix T**. This will enable the additional early works to progress efficiently with the works already underway for the original approved site works.
- The owner of the land prepares and serves a notice pursuant to section 67 of the EP&A Regulation 2021 effecting the amendment of the original DA consent in accordance with the provisions of the new consent for the changes proposed as part of this amending DA.

It is anticipated that the Main Works amending SSDA (SSD-84127221) will then further modify development consent DA-2023/156 as it relates to those works.

The EIS should be read in conjunction with the supporting information and plans accompanying this report.

2. Strategic Context

This section of the EIS identifies key strategic matters relevant to the assessment of the proposal, including the site's features, context, strategic context and other development in the surrounding area. This section also provides an analysis of feasible alternatives that were considered having regard to the proposal's objectives.

2.1 THE SITE

2.1.1 Site Location and Context

The site is located in the City of Wollongong Local Government Area (LGA).

The site located in the Wollongong city centre.

The site is well-connected to public transport and is approximately 100m walk west of the entrance to the Wollongong Railway Station.

A Site Location and Context Map is provided in **Figure 1** below.

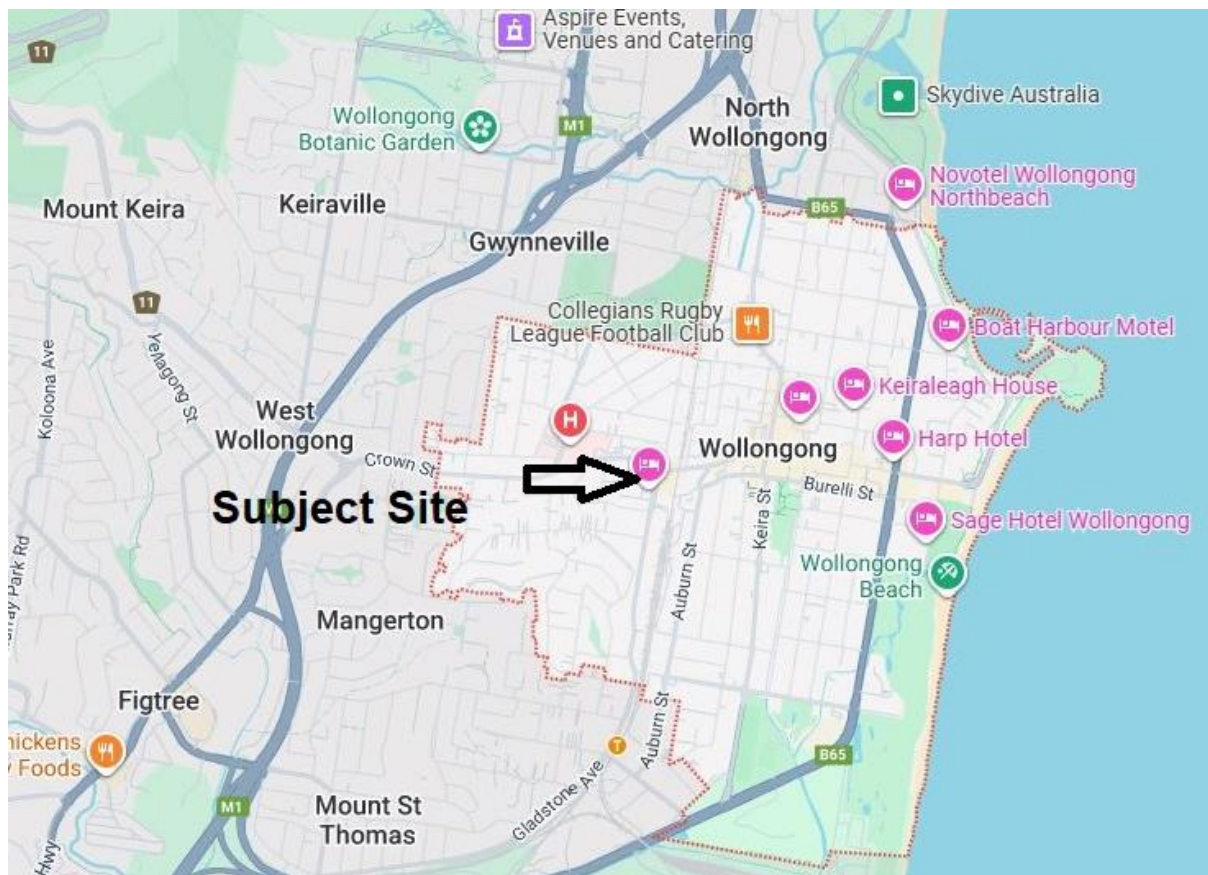


Figure 1 Site location and context

2.1.2 Site Description

The site is located on the south-western corner of Crown Street and Gladstone Avenue and is known as No 357-263 Crown Street and Nos. 2 and 4 Gladstone Avenue, Wollongong.

The site has an area of 6,514m² with frontages to Crown Street and Gladstone Avenue. The site has an irregular shape, and sloping topography. The site currently has a number of vehicle access points into the site that are located in Gladstone Avenue and Crown Street. These footpath crossings were associated with previous land uses operating on the site.

The demolition of the existing structures on the site approved under DA-2023/156 is complete. Until the 1950s, Gladstone House stood on the site. Gladstone House was built for the owner of the land at the time, Dr John Osborne and his family. The dwelling was demolished after 1955 and replaced by a two storey commercial building. A service station operated at No 357 Crown Street until the 1990s and all above ground structures were removed. The site was then used as a carpark for several years.

A heritage-listed Moreton Bay Fig tree is located in the south-western corner of the site and it will be retained and protected during site works.

An aerial photograph of the site and immediate surrounds is provided in **Figure 2** below.



Figure 2 Aerial photograph showing the subject site (in red border) and surrounding area (Source: NearMap)

The legal description of the Site is provided in **Table 2** below.

Table 2 Site Legal Description	
Street Address	Lot/DP
357-359 Crown Street, Wollongong	Lot 2/DP 201949
363 Crown Street, Wollongong	Lot 1/DP 201949
2 Gladstone Avenue, Wollongong	Lot 6/DP 14480
4 Gladstone Avenue, Wollongong	Lot 7/DP 661845

Several recent photographs of the site and its surroundings are provided in **Figures 3 to 5** below.



Figure 3 Photograph site viewed from intersection of Crown Street and Denison Street



Figure 4 Photograph of site viewed from Crown Street looking south



Figure 5 Photograph of site viewed from eastern side of Gladstone Avenue.

2.1.3 Transport and Access

2.1.3.1 Road Access

Existing vehicular access to the site is currently provided from multiple driveways that are located in both Gladstone Avenue and Crown Street. The site benefits from a registered Right of Carriageway (G531434) to the site from the eastern end of Parkinson Street.

The Right of Carriageway was included on a Memorandum of Transfer registered under the Real Property Act 1900 in 1956. The granting of the Right of Carriageway affected the Titles of land known as Vol 4042 Fol 130 and Vol 6120 Fol 44.

The terms of the original Right of Carriageway granted being described as:

“Together with a right of carriage way Twenty feet and thirty feet respectively wide over and along land adjoining the Southern and Eastern boundaries of Lot A as shown in the said Plan and therein marked “Site of (20’ wd) proposed Right of Way (30’ wd)” AND IT IS HEREBY AGREED AND DECLARED that

the benefit of the Right of carriageway shall be appurtenant to the land hereby transferred, the land subject to the burden thereof is the said Lot "A" and the said Right of carriage way may be released varied or modified by the Transferee its successor and assigns".

The land burdened by the Right of Carriageway is today known as Lot 100 DP 1214547. The location of the Right of Carriageway is shown below in **Figure 6**.

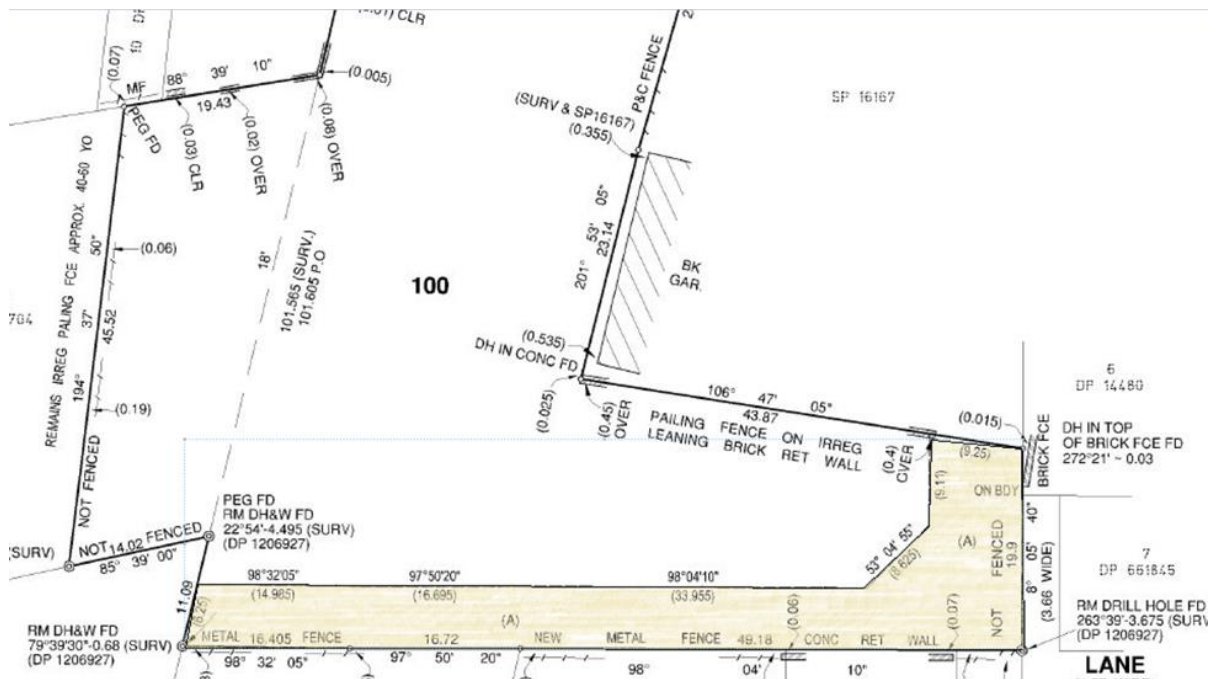


Figure 6 Extent of registered right of Carriageway

2.1.3.2 Public Transport Access

The site is located approximately 100m west of the entrance to Wollongong Railway Station.

The site is also within walking distance of two bus stops. One is located in Gladstone Avenue (bus stop 2500195) and another in Crown Street (bus stop 250045). Both of these bus stops are served by regular timetabled bus services to the surrounding area.

2.1.3.3 Pedestrian Access

The site's location provides for good level of pedestrian mobility and access to key locations within the Wollongong city centre. The proposed development will include the future upgrade the existing footways along both Crown Street and Gladstone Avenue to encourage increased use by pedestrians seeking to access Wollongong Railway Station and nearby office developments along Crown Street.

2.1.3.4 Bicycle Access

There are no dedicated bicycle lanes in the vicinity of the site, however the site is well located for bicycle access from surrounding areas.

The Wollongong Cycling Strategy 2030 has identified the designation of the Wollongong City Centre as a cycling district and prioritising the design and delivery of key cycling connections to and through the Wollongong CBD.

2.1.3.5 Heritage

The Moreton Bay Fig Tree located at the rear of the site is identified as a heritage item in Schedule 5 of *Wollongong Local Environmental Plan 2009*.

The site is not located within a Heritage Conservation Area (HCA). There are several items in proximity of the site. These include:

- Wollongong Railway Station (SHR 01289). The item known as the Wollongong Railway Station Complex is located 100m to the east of the site.
- Tatterall's Hotel (LEP Item 6242). Tattersall's Hotel is located 150m to the east of the site.
- Former Berlei Building (LEP Item 61095). The former Berlei Building is located 110m to the north of the site.
- Wollongong Trade School (LEP Item 6467). The Wollongong Trade School building is located 270m to the south of the site.
- Group of Fig Trees (LEP Item 5939). The group of mature fig trees are located on the southern side of the Wollongong Hospital. Originally a group of five trees, two were removed in 2012 as part of the redevelopment of the hospital site.

An extract of the WLEP Heritage Map is provided at **Figure 7** below.

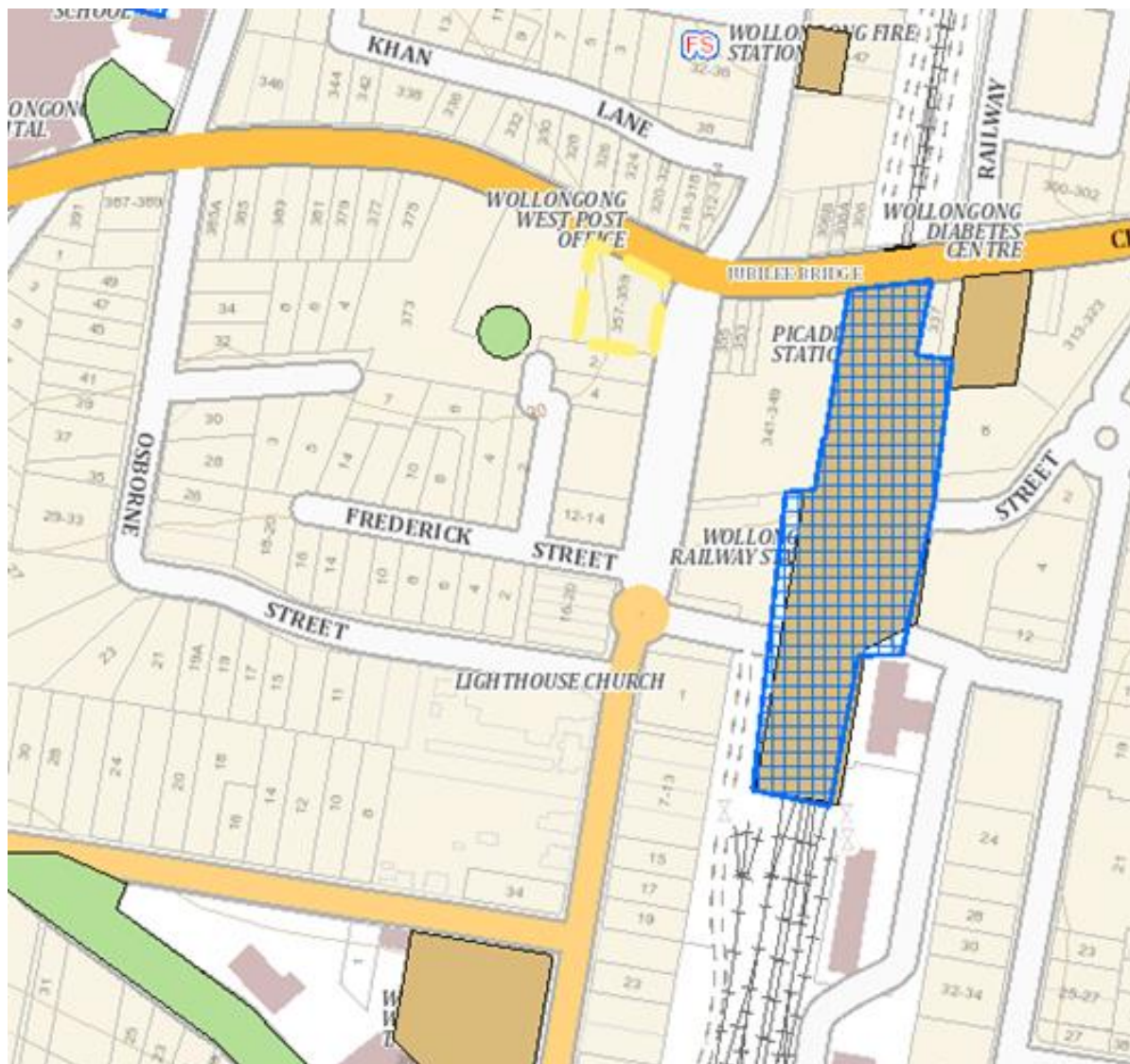


Figure 7 Extract of WLEP Heritage Map

2.1.4 Flooding

The site is located on a ridge that runs along Crown Street. The site's location is broadly at the top of the local catchment that includes most of the Wollongong city centre and drains towards the ocean near Port Kembla.

The 1% AEP flood event in the Wollongong City Centre was presented in the Wollongong City Flood Study (2019). The extent of inundation during the 1% AEP flood event in the vicinity of the site is shown in Figure 7 below. This figure shows the site and the roadway on both Crown Street and Gladstone Avenue to be not affected by the 1% AEP flood event. Flood advice received from Wollongong City Council has confirmed that the majority part of the site is not affected by mainstream flooding.

Flood information for No 4 Gladstone Avenue indicates there is one area on that lot with flood levels on the land. The predicted flood levels are:

- 20% AEP – RL 32.26m AHD
- 1% AEP - RL 32.27m AHD

- PMF – 32.28m AHD.

Figure 8 below shows an extract from the *Review of Wollongong City Flood Study (Jacobs)* that was carried out for Council in 2019.



Figure 8 Flood Hazard risk for site

2.1.5 Contamination

Previous land uses on the site have included residential, commercial, retail development. As such, there is a requirement to investigate the site for potential soil contamination. A number of previous investigations have been carried out on the land.

The development consent for DA-2023/156 (condition 7) requires site remediation to be undertaken as per the Remedial Action Plan (RAP) prepared by *El Australia Consulting* (dated April 2023) (**Appendix J**).

The RAP provides for a sequential process for remediation and validation works to support the proposed site redevelopment to satisfy chapter 4 of *State Environmental Planning Policy (Resilience and Hazards) 2021*. The RAP found that the site can be made suitable for the proposed land use through the implementation of the site remediation and validation process set out in the document.

2.1.6 Topography

The site's topography is gently sloping falling away from Crown Street towards the south. In addition, the site also has a gentle slope from the west (35-37m AHD) to the east (35m AHD).

The site's topography is shown in the contour map in **Figure 9** below.



Figure 9 Site topography

2.2 SURROUNDING DEVELOPMENT

This section describes the key characteristics of the existing development on the land surrounding the subject site.

2.2.1 No. 373 Crown Street, Wollongong

To the west of the Site is a recently constructed mixed-use development comprising two (2) towers of 16 storeys and 10 storeys above a podium of retail and office floor space at No. 373 Crown Street (**Figure 10**). This development was approved under DA-2006/1698 and comprises 149 residential apartments with commercial office space within the building's podium at ground and upper ground level.



Figure 10 Completed multi-storey residential development at No 373 Crown Street, Wollongong

2.2.2 No 6-10 Gladstone Avenue, Wollongong

South of the subject site, at No 6-10 Gladstone Avenue, is a building erected for the purpose of tourist and visitor accommodation (currently operating under the Mantra brand of serviced apartments). A photograph of this building and its relationship to the site is shown below in **Figure 11**.



Figure 11 Photograph of the Mantra Serviced Apartments building to the south of the site

Wollongong City Council approved DA-2005/864 for the construction of an eight (8) storey building containing 54 serviced apartments in in September 2005.

South of the Mantra building is three (3) storey residential flat building located on the corner of Frederick Street and Gladstone Avenue.

2.2.3 No 341-355 Crown Street, Wollongong

Located to the east of the subject site, on the opposite corner of Crown Street and Gladstone Avenue, there is retail and commercial buildings known as Browns Corner and the Piccadilly Centre. Recent photographic images of these buildings are shown below in **Figures 12 to 14**.



Figure 12 Photograph of Browns Corner and adjacent buildings located on the southern side of Crown Street



Figure 13 Photograph of the Piccadilly Centre building adjacent to the entrance to Wollongong Railway Station



Figure 14 Photograph of the rear of Browns Corner and Piccadilly Centre viewed from Gladstone Avenue

2.2.4 No 316-326 Crown Street, Wollongong

To the north of the site, between No 316 and No 326 Crown Street, are a row of single and two storey retail buildings. These buildings are located to the west of Denison Street and have rear lane access from Khan Lane. A recent photograph of these buildings taken from the intersection of Crown Street and Gladstone Avenue is provided below in **Figure 15**.



Figure 15 Photograph of group of low-rise shops on northern side of Crown Street opposite the subject site



2.3 STRATEGIC PLANNING CONTEXT

2.3.1 Strategic Planning

This section demonstrates how the vision and intended outcomes for the site are consistent with a range of strategic planning objectives established by both the NSW State Government and the City of Wollongong.

This EIS seeks consent for the Early Works supporting a proposed mixed-use development to be considered under a forthcoming Amending SSDA. As such, the strategic planning context is considered with respect to the future Main Works SSDA, as the proposed Early Works will facilitate its future development. Further consideration of the relevant strategic planning context will be provided in the EIS for the Main Works SSD.

2.3.2 Housing Supply and Affordability

Wollongong is experiencing a significant shortfall in housing supply and affordability. To meet the needs of a growing population, there is a rising need for more diverse and accessible housing options. This SSDA will enable the bulk excavation and infrastructure works that will deliver an increased number of dwellings in a well-established area.

The National Housing Accord (2022) and NSW Housing Strategy 2041 (2021) set an ambitious target for NSW to deliver 377,000 new homes by July 2029, being an additional 25,000 new homes per year. The Early Works will assist to facilitate development that contributes to that target through the delivery of new homes within the Wollongong City Centre.

The Illawarra Shoalhaven Regional Plan 2041 emphasises the importance of increasing housing supply within the Illawarra region, particularly within Wollongong city centre.

The Early Works will facilitate the future delivery of an affordable housing in the Main Works SSDA.

2.3.3 Alignment with Strategic Planning Context

The proposal is consistent with the relevant Government plans, policies and guidelines applying to the site as outlined in **Table 3** below.

Table 3 Summary of Strategic Context

<i>Strategic Plan</i>	<i>Strategic Context</i>
Illawarra Shoalhaven Regional Plan	The Illawarra Shoalhaven Regional Plan 2041 establishes the strategic framework for the Illawarra and Shoalhaven region, which includes Wollongong. It sets strategic objectives that relate to key areas such as housing, sustainability, transport and the economy. These objectives seek to guide development within the region. The proposal assists to satisfy key objectives under the Illawarra Shoalhaven Regional Plan. Specifically, the proposal seeks to provide much need supply of housing, including affordable housing. This supply is optimally located within walking distance to public transport including Wollongong Train Station and is located in the western edge of the Wollongong CBD, with many services, amenities and recreation facilities located within the surrounds. Additionally, the proposed development will provide opportunities for new and publicly accessible connections to be provided through the site for pedestrians and cyclists. These connections improve the permeability of the locality and provide for better linkages across the Wollongong CBD.
Wollongong Local Strategic Planning Statement	The Wollongong Local Strategic Planning Statement (LSPS) establishes a 20-year vision for land use to guide future growth within the Wollongong LGA. It also aims to align within the vision and objectives set under the Illawarra Shoalhaven Regional Plan 2041 and Wollongong Community



Table 3 Summary of Strategic Context

	Strategic Plan. The LSPS identifies the site within the Wollongong City Centre and marks it as a key location for higher density residential flat buildings. The proposal will achieve the objectives of the LSPS by locating increased height and density in a strategic location within the Wollongong CBD. The siting and massing of the development seeks to capitalise on this opportunity by providing taller buildings in appropriate locations around the site that seek to add to and define the Wollongong skyline.
Draft Housing and Affordable Housing Options Paper	The Draft Housing and Affordable Housing Options Paper analyses the housing needs of the Wollongong LGA. It outlines key issues and planning priorities with respect to housing and provides recommendations to address them. It will ultimately inform the development of a new Housing Strategy for the Wollongong LGA. The proposal supports key planning priorities and recommendations under the Draft Housing and Affordable Housing Options Paper as follows: • The proposal as presented allows for increased levels of density on the site when compared to that permitted under the base planning controls whilst maintaining high levels of residential amenity and design. This facilitates additional dwellings of various sizes and increased provision of affordable housing in response to the needs of the LGA. The siting, massing and design of the proposal facilitates the provision of additional apartments, which enables greater opportunity for adaptable housing types to be provided within the scheme. Further, the additional yield facilitated by the design enables the provision of affordable housing.
National Housing Accord (2022)	The Commonwealth announced the National Housing Accord in October 2022, which committed to delivering 1.2 million houses in well-located areas in 5 years starting from July 2024. There is a combined Commonwealth and State government commitment to deliver up to 20,000 additional new, affordable dwellings. The Accord establishes the framework to improving affordability by addressing Australia's housing supply challenges and enabling the delivery of more social and affordable housing. The Housing Accord includes: The proposed development is aligned with the National Housing Accord as it seeks to deliver additional housing, including a contribution to the provision of affordable housing, in a well-serviced location. The proposal will provide for additional housing close to public transport and readily available infrastructure.
NSW Housing Targets	The NSW Government has recently released 5 year housing completion targets for 43 councils across Greater Sydney, Illawarra-Shoalhaven, Central Coast, Lower Hunter and Greater Newcastle and 1 target for regional NSW. These targets replace outdated targets and reflect NSW's commitment to deliver 377,000 new homes across the State by 2029 under the National Housing Accord. A 5 year target of 9,200 new dwellings has been identified for the City of Wollongong LGA. Acknowledging the commitment to quickly deliver as part of the EOI process and reduced construction timeframes, this proposal will contribute to the achievement of this target by 2030.
NSW Housing Strategy - Housing 2041 (2022)	The NSW Housing Strategy (<i>Housing 2041</i>) supports the provision of new housing stock in NSW. Within the Strategy, residential flat buildings and shop top housing are identified as a housing typology to support the diversity and affordability of the rental market. Affordable housing provision will directly deliver this pillar.

Table 3 Summary of Strategic Context

	Housing supply relates to the delivery of housing in the right location at the right time. The proposal seeks to increase housing supply in the right location (close to Wollongong railway station on the fringe of the city centre) at the right time (delivery will be accelerated through the Housing Delivery Authority process, in a direct response to the NSW housing crisis).
Wollongong Health Precinct Strategy (2026)	In February 2026, the NSW Government endorsed the Wollongong Health Precinct Strategy. The Strategy aims to guide the growth of the precinct over the next 25 years. The Strategy identifies land for future health related purposes, residential development, open space and other commercial uses. The site is located on the precinct's eastern edge and is indicated within the Structure Plan (p51) for 'high rise mixed use.'. A State led rezoning has recently commenced to implement the Strategy's vision. The proposed development, providing Early Works for a future Amending DA to DA2023/156 and concurrent rezoning request (being for a high rise mixed use building), is consistent with the Structure Plan and will therefore assist to give effect to the Strategy's aims.

2.4 ANALYSIS OF ALTERNATIVES

A number of alternative options have been considered by the Applicant in response to the strategic need and objectives for the development of the site. This includes not undertaking any works on the site ("do nothing"), proceeding with a different use on the site, and alternative design options for the redevelopment of the scheme.

Table 4 below provides consideration of those options.

Table 4 Consideration of Alternative Options

<i>Alternatives</i>	<i>Consideration</i>
Do Nothing	Under the 'Do Nothing' scenario, the under-developed site would be retained and continue to underperform and be out of step with the changing charter of the precinct. This approach would represent a missed opportunity to make a contribution to the growth and character of the Wollongong City Centre, which anticipates redevelopment of sites such as this one for high density mixed use. On this basis, the 'Do Nothing' scenario is not considered to be an acceptable approach.
Use of the site for an alternative purpose	As the site is zoned E2 Commercial Centre, the site may be redeveloped for an office/business use. An entirely office development on the site is unlikely in the current economic cycle with very little market interest to develop a large office building in this location despite the significant height and FSR available for such a land use.
The proposed development	The proposed development will make a contribution towards the need for more housing within the Wollongong city centre as well as provide for 70 affordable dwellings. The proposed development will deliver effective buildings and dwellings of high quality and support the overall constructability and servicing of the site, ensuring that future residents and users benefit from a high level of service and, amenity and accessibility.



3. Project Description

3.1 PROJECT OVERVIEW

This EIS has been prepared by *Planning Ingenuity*, on behalf of the Applicant, *Wollongong Developments No 5 Pty Ltd*. This application is an Amending DA seeking consent for specified Early Works to facilitate the future development of the site for a mixed-use shop top housing development.

Specialist studies, reports and plans referenced in this EIS are provided in the Appendices.

3.2 EXCAVATION FOR FUTURE BASEMENT

Bulk excavation is proposed to be carried out across all land parcels. Excavation will be accompanied by construction and anchoring of a piled shoring wall and capping beam. The foundation material is discussed in the Geotechnical Investigation Report at **Annexure I**.

Development Consent DA-2023/156 permits partial excavation of the site, and these works have already commenced. The additional excavation and associated shoring proposed under this application (SSD-97973958) will facilitate efficiencies in preparing the site for the separate Main Works SSDA (SSD-84127221), which will deliver a future mixed-use development in conjunction with a concurrent rezoning process. While SSD-97973958 is expected to be lodged at approximately the same time as the Main Works application, it is anticipated that this Early Works application will be determined ahead of the Main Works. This sequencing will enable the timely and efficient augmentation of the approved excavation works currently underway.



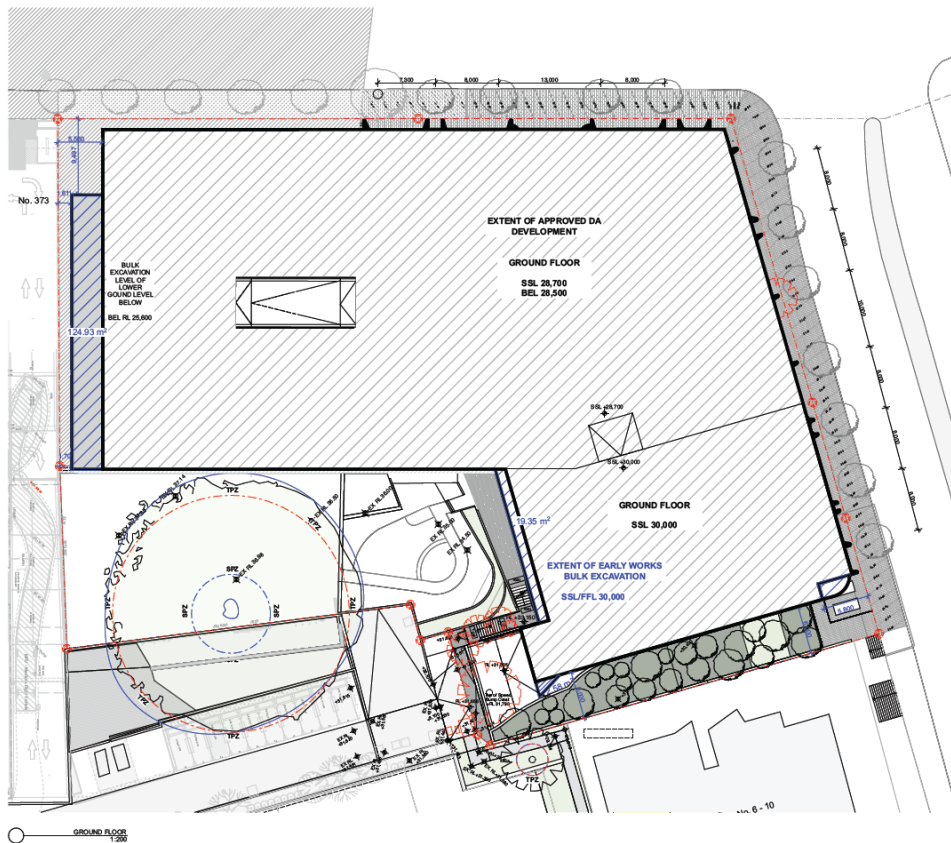


Figure 16 Proposed bulk earthworks ground level (Source: BKA Architecture)

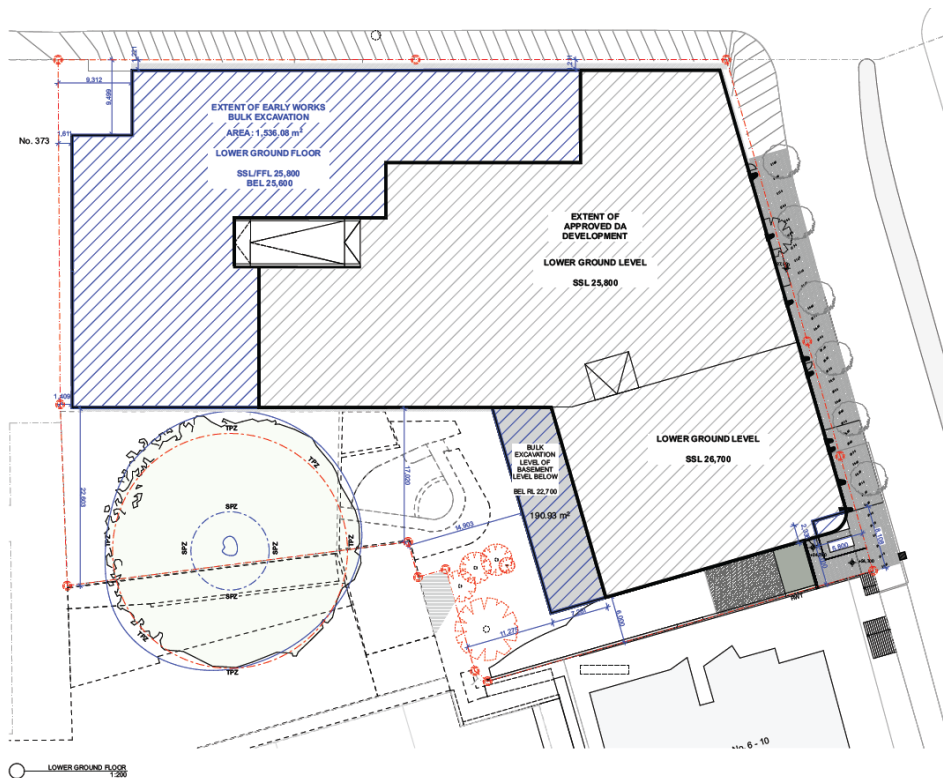


Figure 17 Proposed bulk earthworks lower ground level (Source: BKA Architecture)

**Table 5** Project Team

<i>Document</i>	<i>Author</i>	<i>Location within EIS</i>
SEARS	DPHI	Appendix A
BDAR waiver	DCCEE&W	Appendix B
Bulk Earthworks Plan	BKA Architecture	Appendix C
Survey Plan	GeoSurv	Appendix D
Historical Archaeological Statement	Sustainable Heritage	Appendix E
Construction Noise and Vibration Management Plan	Acoustic Logic	Appendix F
Construction Traffic Management Plan	Genesis Traffic	Appendix G
Aboricultural Impact Assessment Report	Seasoned Tree Consulting	Appendix H
Detailed Site Investigation	EI Australia	Appendix I
Remedial Action Plan	EI Australia	Appendix J
Flooding Desktop Report	S&G Consulting	Appendix K1
Integrated Water Plan	S&G Consulting	Appendix K2
Stormwater Drainage Plans	S&G Consulting	Appendix K3
Geotechnical Investigation	Foundation Earth Sciences	Appendix L
Statement of Heritage Impact	Heritage 21	Appendix M
Aboriginal Heritage Assessment	Artefact	Appendix N
Statutory Compliance Table	Planning Ingenuity	Appendix O
Engagement Outcomes Report	Planning Ingenuity	Appendix P
Estimated Development Cost	Archi-QS	Appendix Q
WDCP compliance table	Planning Ingenuity	Appendix R
Site Management Plan	Mance Arraj Civil & Structural Engineers	Appendix S
List of Mitigation Measures	Planning Ingenuity	Appendix T
Hydrogeological Assessment	Foundation Earth Sciences	Appendix U
DA Consent DA-2023/156	Wollongong City Council	Appendix V

3.6 ESTIMATED DEVELOPMENT COST

The approved DA-2023/156 involved an estimated development cost of \$80.05 million.

The estimated development cost for the proposed Amending DA (as determined by section 6 of the EP&A Regulation 2021) has been calculated by Archi-QS (**Appendix Q**) and is estimated to be \$3.86 million.

3.7 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

Secretary's Environmental Assessment Requirements (SEARs) for the Amending DA (SSD-97973958) were issued by the Department of Planning, Housing and Infrastructure (DPHI) on 12 November 2025. A copy of the SEARs is provided at **Appendix A** of the EIS.



Table 6 below indicates how the matters listed in the SEARs have been addressed throughout this EIS or alternatively are not applicable, noting the works are limited to additional earthworks and shoring up for part of the site, that is additional to that already approved.

Table 6 Consideration of SEARs	
<i>Requirements</i>	<i>Satisfied by</i>
<i>Issues and Assessment Requirements</i>	
Statutory Context	
Address all relevant legislation, environmental planning instruments (EPI) (including drafts), plans, policies, guidelines and planning circulars.	Refer to Appendix O
Identify compliance with applicable development standards and provide a detailed justification for any non-compliances	Refer to Appendix O
Provide an explanation of how the development as described in the EIS consistent with the development as was described in the request for SEARs (including any components that were not SSD) and provide a justification for any differences	The description of the development in section 3 of this EIS is consistent with the scoping letter that accompanied the request for SEARs (by Planning Ingenuity dated 22 January 2026).
Address the requirements of any approvals applying to the site, including any concept approval, any endorsed or draft masterplan, precinct plan or any recommendation from Gateway determination.	Refer to section 4.3 of this EIS.
Provide an accurate summary of the detailed assessment of the impacts of the project and integrate the findings and recommendations of technical reports into the justification and evaluation of the project as a whole.	Refer to section 6 of this EIS.
If affordable housing is being proposed, provide the name and ABN of the registered community housing provider that will be responsible for managing the affordable housing component, along with documentation confirming the provider's agreement to this responsibility.	Not applicable to the proposed Early Works.
Estimated Cost of Development	
Provide the Estimated Development Cost (EDC) of the development prepared in accordance with the relevant planning circular using the Standard Form of EDC report.	Refer to Appendix Q .
As applicable, the EDC report must separately specify the EDC of: - the residential component of the development - the tenant component of the build-to-rent development, the seniors housing component of the development	Not applicable to the proposed Early Works development.
Contributions and Public Benefit	
Address the requirements of any relevant contribution plan(s), planning agreement or EPI requiring a monetary contribution, dedication of land and/or works-in-kind agreement, and include details of any proposal for further material public benefit.	Refer to section 6.13 of the EIS.
Where a voluntary planning agreement is proposed, prepare a draft planning agreement in accordance with the Planning Agreements – Practice Note February 2021.	Not applicable to the proposed development.
Engagement	
Demonstrate that engagement and consultation activities have been undertaken in accordance with the <i>Undertaking Engagement Guidelines for State Significant Projects</i> and	Refer to section 5.0 of the EIS and Appendix P .

Table 6 Consideration of SEARs

identify how issues raised, and feedback received have been considered in the design of the project.

- if the development would have required an approval or authorisation under another Act but for the application of s4.41 of the EP&A Act or requires an approval or authorisation under another Act to be applied consistently by s4.41 of the EP&A Act, the agency relevant to that approval or authorisation must be consulted.

Design Quality

Demonstrate how the development will achieve:

- design excellence in accordance with any applicable EPI Provisions

good design in accordance with the seven objectives for good design in *Better Placed*.

Refer to section 6.13 of the EIS.

Demonstrate that the development:

- where required by an EPI or concept approval, or where proposed, has been subject to a competitive design process, carried out in accordance with an endorsed brief and Design Excellence Strategy; or

in all other instances, has been reviewed by the State Design Review Panel (SDRP) where required under the NSW SDRP: *Guidelines for Project Teams*.

Refer to section 6.13 of the EIS.

Recommendations of the jury and Design Integrity Panel (where a competitive design process has been held) or the SDRP are to be addressed prior to lodgement.

Refer to section 6.13 of the EIS.

Built Form and Urban Design

Demonstrate how the proposed built form (layout, height, bulk, scale, separation, setbacks, interface and articulation) addresses and responds to the context, site characteristics, streetscape and existing and future character of the locality. Where relevant explain and illustrate the application of any bonuses under an EPI.

Refer to section 6.13 of the EIS.

If relevant, provide an assessment of the development against:

- the design principles for seniors housing set out in Schedule 8 of State Environmental Planning Policy (Housing) 2021 (Housing SEPP) and the Seniors Housing Design Guide.

the design principles for residential apartment development set out in Schedule 9 of the Housing SEPP and the Apartment Design Guide (ADG). This should include a table which demonstrates how each dwelling (including affordable dwellings) performs against the ADG design criteria.

Refer to section 6.13 of the EIS.

If affordable housing is proposed, provide a floorplan outlining the gross floor area and dwellings that are provided as affordable housing.

Refer to section 6.13 of the EIS.

Environmental Amenity

Assess amenity impacts on the surrounding locality, including solar access, visual privacy and view sharing, as well as wind, lighting and reflectivity impacts. A high level of environmental amenity for any surrounding residential or other sensitive land uses must be demonstrated.

Refer to section 6.13 of the EIS.

Provide a solar access analysis of the overshadowing impacts of the development within the site, on surrounding properties and public spaces (during winter solstice) at hourly intervals between 9am and 3pm, compare the proposed development, existing situation and where applicable with no bonuses applied.

Refer to section 6.13 of the EIS.

Visual Impact

Provide a visual analysis of the development from key viewpoints, including photomontages or perspectives showing the proposed and likely future development.

Given the nature of the proposed works - being subsurface level - a visual

Table 6 Consideration of SEARs

	impact assessment is not relevant.
If the proposal would result in significant visual impact not anticipated by the planning controls, provide a visual impact assessment that addresses the visual impact of the development on the existing catchment.	As above.
Transport	
Provide a Transport Impact Assessment (TIA) in accordance with the processes and methodology recommended in the Guide to Traffic Impact Assessment (GITA) published by TfNSW.	Refer to section 6.2 of the EIS.
If the construction of the development would cause interruptions to regular pedestrian and transport routes (including public transport, active transport or general traffic), a preliminary Construction Traffic (or Transport) Management Plan (CTMP) should be prepared as part of the TIA to mitigate any such impacts.	Refer to section 6.2 of the EIS.
Noise and Vibration	
Provide a noise and vibration impact assessment prepared in accordance with the relevant NSW Environmental Protection Authority (EPA) guidelines. The assessment must detail construction and operational noise and vibration impacts on nearby sensitive receivers and structures and outline the proposed management and mitigation measures that would be implemented.	Refer to section 6.3 of the EIS.
Water Management	
Detail the proposed drainage design and servicing infrastructure to be incorporated as part of the development (stormwater and wastewater)	Refer to section 6.7 of the EIS
Demonstrate how the development complies with Council's Drainage requirements and identify proposed stormwater treatment and water quality management measures to minimise adverse environmental impacts.	Refer to section 6.7 of the EIS.
Ground and Groundwater Conditions	
Assess potential impacts on soil resources and related infrastructure and riparian lands on and near the site and including soil erosion.	Refer to section 6.6 of the EIS
Where required, provide a Groundwater Impact Assessment in accordance with relevant Groundwater Guidelines. If the proposed development is on land identified as having high salinity or acid sulfate soils in an EPI provide a Salinity Management Plan or Acid Sulfate Soil Management Plan that includes appropriate management measures and strategies.	Refer to section 6.6 of the EIS.
Contamination and Remediation	
In accordance with Chapter 4 of the State Environmental Planning Policy (Resilience and Hazards) 2021, assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable (or will be suitable, after remediation) for the development.	Refer to section 6.11 of the EIS.
Trees and Landscaping	
Provide a landscape plan, that: • details the proposed site planting, including location, number and species of plantings, height of trees at maturity and proposed canopy coverage (as a percentage of the site area). provides evidence that opportunities to retain significant trees have been explored and/or inform the plan.	Refer to section 6.8 of the EIS.

Table 6 Consideration of SEARs

If the proposal involves impacts to trees, provide an Arboricultural Impact Assessment that assesses the number, location, condition and significance of trees to be removed and retained including: any existing canopy coverage to be retained on the site, tree root mapping. If the proposal involves significant impacts to tree-protection zones of retained trees identified as being significant.	Refer to section 6.8 of the EIS.
Ecologically Sustainable Development (ESD)	
Identify how ESD principles (as defined in section 193 of the EP&A Regulation) are incorporated in the design and ongoing operation of the development.	Refer to section 7.3 of the EIS.
Where relevant, provide an assessment of the development against the standards for non-residential development set out in Chapter 3 of <i>State Environmental Planning Policy (Sustainable Buildings) 2022</i> .	Not applicable to the proposed development.
Biodiversity	
Unless a waiver has been granted, provide a Biodiversity Development Assessment Report (BDAR) that assesses any biodiversity impacts associated with the development in accordance with the <i>Biodiversity Conservation Act 2016</i> and the <i>Biodiversity Assessment Method 2020</i> . OR	Refer to section 6.13 of the EIS.
If the development is on biodiversity certified land, provide information to identify the site (using associated mapping) and demonstrate the proposed development is consistent with the relevant biodiversity measure conferred by the biodiversity certification.	Not applicable to the proposed development.
Waste Management	
Provide the measures to be implemented to manage, reuse, recycle and safely dispose of waste, including in accordance with any council waste management requirements.	Refer to section 6.9 of the EIS.
Identify appropriately sited waste storage areas, collection access paths/roads, and appropriate servicing arrangements for the site.	Refer to section 6.9 of the EIS.
Social Impact	
The EIS must consider social impacts and, should any significant social impacts be identified, a Social Impact Assessment must be prepared in accordance with the <i>Social Impact Assessment Guideline for State Significant Projects</i> .	Refer to section 6.12 of the EIS.
Flood Risk	
Identify the flood planning area and level as set out in the relevant EPI and other supporting documents to determine: - The flood extent and velocity up to the Probably Maximum Flood and risk on-site having regard to adopted flood studies and, floodplain risk management studies and plans. - The site access and egress route, - The potential effects of climate change, Any relevant provisions of the <i>NSW Flood Risk Management Manual</i>, and any other relevant guidelines.	Refer to section 6.6 of the EIS.
Where the development is occurring on flood prone land a flood impact and risk assessment (FIRA) must be prepared having regard to the <i>Flood Impact and Risk Assessment – Flood Risk Management Guide LU01</i> . When determining the scope and category of the FIRA the requirements outlined in the FIRA guide must be considered.	Not applicable as the site is not flood affected.
Detail any flood risk management measures that are to be incorporated as part of the development having regard to relevant guidelines (including any design solutions, flood mitigation measures, property modification measures, operational procedures or Flood Emergency Response Plan).	Not applicable as the site is not flood affected.

Table 6 Consideration of SEARs**Bush Fire Risk**

If the development is on mapped bush fire prone land, or a bush/grass fire threat is identified on or adjoining the site, provide a bush fire assessment that details proposed bush fire protection measures and demonstrates compliance with <i>Planning for Bush Fire Protection</i> .	As the site is not mapped as bushfire prone land, no further assessment of this risk is warranted.
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Aboriginal Cultural Heritage

Where there is known, or reasonably likely, to be Aboriginal cultural heritage on or near the site demonstrate that impacts have been adequately investigated and assessed by: Identifying that an appropriate prior planning process has already considered these impacts, eg. a rezoning or development application, Providing an initial assessment of the potential impacts.	Refer to section 6.10.1 of the EIS.
If potential impacts are significant, provide an Aboriginal Cultural Heritage Assessment Report (ACHAR) which: Identifies, describes and assesses any impacts to Aboriginal cultural heritage sites or values associated with the site. Is prepared in accordance with relevant guidelines.	Not applicable.
Where there is known, or reasonably likely, to be Aboriginal cultural heritage on or near the site demonstrate that impacts have been adequately investigated and assessed by: Identifying that an appropriate prior planning process has already considered these impacts, eg. a rezoning or development application, Providing an initial assessment of the potential impacts.	Not applicable

Environmental Heritage

Where there is potential for direct or indirect impacts on environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (where required), in accordance with the relevant guidelines.	Refer to section 6.10.2 of the EIS.
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Public Space

If public space, is proposed as part of the development, demonstrate how the development: - maximises the amount, access to and quantity of public spaces (including open space, public facilities and streets/plazas within and surrounding the site), reflecting relevant design guidelines and advice from the local council and the Department - provides accessible public space, - maximises permeability and connectivity, - maximises the amenity of public spaces in line with their intended use, such as through adequate facilities, solar access, shade and wind protection. - maximises street activation, minimises potential vehicle, bicycle and pedestrian conflicts.	Not applicable
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Hazards and Risk

If the development is affected by above ground dangerous goods storages from the surrounding developments and/or underground high-pressure dangerous goods pipelines in the vicinity of proposal location: report on any consultation outcomes with operators, Consider whether the development would cause these storages non-compliance with Australian Standards.	The site is not located in the vicinity of any dangerous goods storage sites or underground high pressure gas or fuel pipelines. As such, there is no risk that warrants further assessment.
Where applicable, provide a Hazard Analysis in line with relevant guidelines and planning circular.	Not applicable



4. Statutory Context

Development consent is sought for the project under the State Significant Development provision of Part 4 of the EP&A Act. The sections below outline the proposal's key statutory requirements. This section is supported by the Statutory Compliance Table included at **Appendix O** that identifies all relevant statutory matters and where the requirements have been addressed in the EIS.

4.1 POWER TO GRANT APPROVAL

The legislative pathway under which the consent is sought, why the pathway applies, and the relevant consent authority is outlined in **Table 7** below.

Table 7 Power to Grant Consent	
Matter	Consideration
Declaration of State Significant Development	Development consent will be sought under 'Division 4.7 – State Significant Development' of the EP&A Act. Section 4.36(3) of the EP&A Act states that: <i>The Minister may, be a Ministerial planning order, declare a specified development on specified land to be State significant development, but only if the Minister has obtained and made publicly available advice about the State or regional planning significance of the development.</i> The State Significant Development Declaration Order (No 5) 2025 dated 14 April 2025 declared the site as State significant development under the EP& Act. Part 2 of the Order states the following: <i>4 Specified development on specified land declared State significant development</i> <i>(1) The following development is declared to be State significant development-</i> <i>(b) development specified in EOI application 236817 dated 5 February 2025 including development for the purpose of shop top housing with provision of affordable housing at 359 Crown Street, 363 Crown Street, 2 Gladstone Avenue and 4 Gladstone Avenue, Wollongong being Lot 1/DP201949, Lot 2/DP201949, Lot 6/DP14480 and Lot 7/DP661845.</i>
Consent Authority	Section 4.5 of the EP&A Act stipulates that the consent authority for a SSD is the Minister (unless it is a kind of development where the Independent Planning Commission is the consent authority).

4.2 PERMISSIBILITY

The permissibility of the proposed development considering the proposed land use/s and land zoning is outlined in **Table 8** below.



Table 8 Permissibility

Matter	Consideration
Land Use	This Early Works SSDA will be associated with the future Main Works SSDA which proposes the following uses: • Shop top housing • Commercial premises
Land Zoning	The site is zoned E2 Commercial Centre under <i>Wollongong Local Environmental Plan 2009</i> .
Permissibility	All proposed land uses are permissible with consent within the E2 Commercial Centre zone. The proposed Early Works are associated with the development of the proposed uses.

4.3 OTHER APPROVALS

The other legislative approvals required for this Proposal in addition to a development consent under Division 4.7 of the EP&A Act are outlined in **Table 9** below.

Table 9 Other Approvals

Matter	Consideration
Approvals not required for SSD	Section 4.41 of the EP&A Act stipulates that certain authorisations are not required for State Significant Development. The following legislative approvals would otherwise be required if the project was not of State significance. • Fisheries Management Act 1994 – No • Heritage Act – No • National Parks and Wildlife Act 1974 – No • Rural Fires Act – No • Coal Mines Compensation Act 2017 – No • Water Management Act 2000 – Yes
Water Management Act 2000	As indicated in the Geotechnical Investigation report prepared by <i>Foundation Earth Sciences (Appendix L)</i>, no groundwater seepage was observed during the augering of the boreholes. However groundwater was recorded within the installed groundwater well. Pursuant to section 4.41 of the EP&A Act, SSD is exempt from requirements for water use approval (section 89), a water management work approval (section 90) or an activity approval (other than an aquifer interference approval) (section 91) of the <i>Water Management Act 2000</i>. The Applicant has consulted with the Department of Climate Change, Energy, the Environment and Water – Water Group (DCCEE) during the preparation of this application and the requirements have been included in the SSDA.
Consistent Approvals	Section 4.42 of the EP&A Act stipulates that certain authorisations cannot be refused if they are necessary for carrying out State significant development. These include approvals under the Fisheries Management Act 1994, the Coal Mine Subsidence Compensation Act 2017, the Mining Act 1992, the Petroleum (Onshore) Act 1991, the Protection of the Environment Operations Act 1997, the Roads Act 1993 and the Pipelines Act 1967. The Early Works SSDA does not require any of these approvals.
EPBC Approval	The <i>Environmental Protection and Biodiversity Act 1999</i> (C'wth) provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities and heritage places. These are known as Matters of National Environmental Significance (MNES). If the proposed development will, or is likely, to impact a MNES, then

Table 9 Other Approvals

it is required to be referred to the Australian Government's Department of the Environment for assessment to determine if it constitutes a 'controlled action' requiring EPBC approval. Presently, a bilateral agreement allows the Commonwealth Minister for the Environment to rely on the NSW environmental assessment process when assessing a controlled action under the EPBC Act. The proposed development is in a highly urbanised area without significant vegetation and therefore is not likely to impact a MNES. Therefore, the proposed development is not required to be referred to the Australian Government Department of the Environment.

4.4 PRE-CONDITIONS TO EXERCISING THE POWER TO GRANT CONSENT

The pre-conditions to be fulfilled by the consent authority before exercising their power to grant development consent are identified and considered in **Table 10** below.

Table 10 Pre-conditions to Exercising the Power to Grant Consent

Matter	Consideration
Biodiversity Conservation Act 2016	In accordance with this Act, an assessment of any State-significant proposal's biodiversity impacts must be undertaken as part of the provision of any SSDA, including the provision of a Biodiversity Development Assessment Report (BDAR) in instances where it is required. Section 7.14 requires the consent authority to take into consideration the likely impact of the proposed development on biodiversity values as assessed in the BDAR. Given the site's location within the Wollongong city centre and the absence of native vegetation communities, the proposed development is not considered to result in any adverse impacts to biodiversity on the site or within the surrounding area. As such, this SSDA is accompanied by a BDAR Waiver issued by the Department of Climate Change, Energy, the Environment and Water on 12 August 2025 (Appendix B).
State Environmental Planning Policy (Transport and Infrastructure) 2021	The State Environmental Planning Policy (Transport and Infrastructure) 2021 aims to facilitate the effective delivery of infrastructure and avoid adverse impacts to public infrastructure (roads, railways, pipelines and electricity infrastructure). The site is located adjacent to Crown Street and Gladstone Avenue, which are both classified roads. Clause 2.48 Determination of development applications – other development This clause requires the consent authority to give written notice to the electricity supply authority for the area and take into consideration any response to that notice before granting consent to a development application likely to affect an electrical transmission or distribution network. The application will be referred to Endeavour Energy during the assessment. Further discussion on infrastructure and utilities is provided at section 5.2 of this EIS. Clause 2.119 Development with frontage to classified road This clause relates to a development on land that adjoins a classified road. This section requires that: <i>(2) The consent authority must not grant consent to development on land that has a frontage to a classified road unless it is satisfied that:-</i> <i>(a) where practicable and safe, vehicle access to the land is provided by a road other than the classified road, and</i>

Table 10 Pre-conditions to Exercising the Power to Grant Consent

- (b) the safety, efficiency and ongoing operation of the classified road will not be adversely affected by the development as a result of-*
- (i) the design of the vehicular access to the land, or*
- (ii) the emission of smoke or dust from the development, or*
- (iii) the nature, volume or frequency of vehicles using the classified road to gain access to the land, and*
- (c) the development is a type that is not sensitive to traffic noise or vehicle emissions, or is appropriately located and designed, or includes measures, to ameliorate potential traffic noise or vehicle emissions within the site of the development arising from the adjacent classified road.*

As discussed further in section 6.2 of this EIS, access to the site has been designed to ensure that above criteria are satisfied.

State Environmental Planning Policy (Resilience and Hazards) 2021

Chapter 4 of the State Environmental Planning Policy (Resilience and Hazards) 2021 aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment.

Clause 4.6 requires that the consent authority must not consent to the carrying out of development unless:

- 1) It has considered whether the land is contaminated, and if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out.
- 2) If the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.

This EIS is supported by a Detailed Site Investigation (**Annexure I**) and Remedial Action Plan (**Appendix J**) both prepared by EI Australia which confirm that the site will be made suitable for the proposed development.

4.5 MANDATORY MATTERS FOR CONSIDERATION

The matters that the consent authority is required to consider in deciding whether to grant consent to any development application are identified and considered in **Table 11** below.

Table 11 Mandatory Matters for Consideration

Matter	Consideration
Environmental Planning and Assessment Act 1979	The proposed development is consistent with the objects of the EP&A Act for the following reasons: • The proposal promotes the orderly economic use of the land as the development will facilitate delivery of housing, including affordable housing to meet the housing needs of the local community. • The proposal provides for additional employment opportunities within the Wollongong city centre, • The proposal facilitates ecologically sustainable development,

Table 11 Mandatory Matters for Consideration

	• The proposal is consistent with Division 4.7 of the EP&A Act, particularly for the following reasons: • The proposal has been declared to have State-significance, • The development is not prohibited by an environmental planning instrument. • The development has been assessed against the relevant heads of consideration under section 4.15(1) as outlined in this Table. For a detailed assessment against the objects of the Act refer to section 7.4. of this EIS. Other matters relevant under the EP&A Act include consideration of section 4.15 that is provided in section 7 of this EIS.
Environmental Planning and Assessment Regulation 2021	Part 8, Divisions 2 and 5 of the Environmental Planning and Assessment Regulation 2021 set out the procedures which relate to the preparation and submission of an Environmental Impact Statement (EIS). This EIS has been prepared in accordance with sections 190 and 192 of the EP&A Regulation which relate to the form and content of the EIS. The EIS has also addressed the principles of ecologically sustainable development (ESD) through the precautionary principle which assesses threats of any serious or irreversible environmental damage.
State Environmental Planning Policy (Biodiversity and Conservation) 2021	Chapter 2 of the State Environmental Planning Policy (Biodiversity and Conservation) 2021 details provisions regarding the preservation and management of vegetation in non-rural areas. The proposed Early Works do not involve any activity that would require assessment under this policy.
Wollongong Local Environmental Plan 2009	The relevant provisions of WLEP are considered below.
Clause 2.3 Zone objectives and Land Use Table	The Early Works are associated with uses that are permissible in the E2 zone. The Early Works are therefore consistent with the objectives of the zone, in that they will facilitate a future development that will encourage a diversity of uses that generate employment opportunities, provide active street frontages, include non-residential uses on ground floor areas, supports the vitality of the western edge of the Wollongong City Centre and enable residential development that will contribute to a vibrant and active city centre and is consistent with Wollongong Council's strategic planning for development in the area.
Clause 5.10 Heritage Conservation	The Moreton Bay Fig Tree is a listed item of local heritage significance and as such the proposed development has been designed to ensure its retention and future health. The development will also ensure that its heritage values are not diminished.
Clause 5.21 Flood Planning	Development consent must not be granted to development on land the consent authority considers to be within the Flood Planning Area (FPA) unless the consent authority is satisfied the development is compatible with the flood function of the land and will not adversely affect flood behaviour. A Flood Impact and Risk Assessment has been prepared by <i>S&G Consultants</i> and is submitted with the application (Annexure J).
Clause 7.6 Earthworks	This clause requires consideration of certain matters where consent is sought for undertaking earthworks. The proposed development involves additional excavation of the site beyond that approved under DA-2023/156. Consideration of clause 7.6 is provided in this EIS.
Clause 7.13 Certain land within employment or mixed use zones	Not applicable.

Table 11 Mandatory Matters for Consideration

Clause 7.18 Design Excellence in Wollongong City Centre and Key Sites	The requirement to achieve design excellence applies to the Main Works SSD which has been subject to review by the SDRP. The Early Works do not alter any of the design elements of the approved DA-2023/156.
Clause 7.19 Active Frontages	This clause applies to the E2 Commercial Centre zone and aims to attract pedestrian traffic at street level. The proposed Early Works do not alter the currently approved design features that contribute to the activation of the project at street level.
Wollongong Development Control Plan (WDCP)	It is noted that section 2.10 of the Planning Systems SEPP states that “ <i>development control plans (whether made before or after the commencement of this Chapter) do not apply to- (a) State significant development</i> ”. Despite this, Consideration of the provisions of WDCP is provided in Appendix R .



5. Stakeholder Engagement

This section describes consultation undertaken and feedback received prior to the lodgement of the EIS for the proposal and engagement to be carried out following the lodgement of the EIS. It is supported by a Consultation Outcomes Report that has been prepared by *Planning Ingenuity* and is included at **Appendix P**.

5.1 ENGAGEMENT CARRIED OUT

Detailed consideration has been given to the SEARs during the consultation for this project, including reference to the *Undertaking Engagement Guidelines for State Significant Projects* (October 2022).

5.1.1 Identified Stakeholders

A comprehensive list of community members and stakeholders to consult throughout the preparation of the EIS was developed through:

- Identification of neighbours who would be impacted by the proposal unless mitigation measures were implemented.
- Identifying stakeholders who would have a particular interest in the proposal,
- Identification of stakeholders who would have information of particular value to the proposal, such as local knowledge,
- Consultation with DPHI and State agencies as directed in the SEARs.

As a result of the above process, a number of stakeholders were identified for consultation, including:

- Wollongong City Council;
- Government agencies, including DPHI, Transport for NSW, Heritage NSW, DCCEEW and the EPA;
- Service providers and public authorities, including: Sydney Water and Endeavour Energy;
- Immediate neighbours and residents; and
- Surrounding businesses and groups.

5.1.2 Consultation Methods

As detailed in the Engagement Outcomes Report (**Appendix P**) of the EIS, a range of consultation methods were used to engage stakeholders. These included activities completed prior to the lodgement of the EIS. The consultation methods are explained in **Table 12** below. In addition, there was targeted engagement with relevant agencies.

Table 12 Other Approvals

Activity	Targeted Stakeholder	Purpose	How Engagement informed the Project
Project notification letter	Local residents and businesses	Letters distributed to surrounding neighbours via letterbox informing them of the proposal and inviting them provide comments and indicating to register interest in the project.	The invitation to local residents and business to comment provided an opportunity for these groups to raise potential issues with the design of the development.





Table 12 Other Approvals

Stakeholder Notification Letters and Emails	Key Stakeholders	Initiate conversations with stakeholders on important issues and concerns to those groups.	Ensured that key stakeholders are made aware of the proposal.
Portal Notifications	NSW Government Agencies and Wollongong City Council	Creation of PAE engagement requests through the Major Projects portal.	Initiate a formal engagement process with relevant NSW Government stakeholders.

5.2 UTILITY STAKEHOLDER COMMENTS

The key issues and matters raised by the utility stakeholders during the preparation of the EIS for the Early Works are outlined in **Table 13** below.

Table 13 Key Issues

Utility Name	Project Response
Sydney Water	Notice of Requirements issued on 11 March 2025 (Reference 219972) Early Works on the site will be undertaken to satisfy those requirements. There are no requirements specific to the Early Works SSD.
Endeavour Energy	Endeavour Energy will require the augmentation of its electricity distribution infrastructure in the vicinity of the site for the proposed future development of the site. These works do not impact the Early Works SSD.

5.3 STATE DESIGN REVIEW PANEL

The proposed Early Works do not compromise works that require achievement of Design Excellence pursuant to Wollongong LEP 2009.

Notwithstanding this, in preparing the subsequent Main Works SSDA, the Applicant has met with the NSW Government's State Design Review Panel (SDRP) on two (2) occasions prior to lodgement of this SSDA, on 6 August and 15 October 2025, respectively.

While discussion at both SDRP briefings relate to the subsequent Main Works SSDA, it is noted that provision of feedback from the SDRP has been carried through to the Early Works SSDA.

5.4 DPHI ENGAGEMENT AND AGENCIES CONSULTED

As part of the Industry-specific SEARs for Housing, the Applicant is required to consult with specific agencies regarding relevant approvals or authorisations under other Acts. Specifically, SEAR 4 states:

"Demonstrate that engagement and consultation activities have been undertaken in accordance with the Undertaking Engagement Guidelines for State Significant Projects and identify how issues raised, and feedback received have been considered in the design of the project.

If the development would have required an approval or authorisation under another Act but for the application of s 4.41 of the EP&A Act or requires an approval or authorisation under another Act to be applied consistently by s 4.42 of the EP&A Act, the agency relevant to that approval or authorisation must be consulted."



It was identified by the Applicant that relevant agencies are the Department of Climate Change, Energy, the Environment and Water (Water) and Transport for NSW (TfNSW). The response received from each agency is noted in the **Table 14** below.

Table 14 Record of State Government Agency and Authority Meetings and Correspondence			
<i>Date</i>	<i>Stakeholder/s</i>	<i>Activities</i>	<i>Purpose</i>
10 November 2025	Heritage NSW	Portal notification (PAE)	Notice of the proposed development was provided to Heritage NSW. The comments received have been addressed within the Engagement Outcomes Report. (Appendix P).
10 November 2025	Transport for NSW	Portal notification (PAE)	Notice of the proposed development was provided to Transport for NSW. The comments received have been addressed within the Engagement Outcomes Report. (Appendix P).
10 November 2025	Environment Protection Authority	Portal notification (PAE)	Notice of the proposed development was provided to the EPA. The EPA indicated that it did not have any comments on the proposal.
10 November 2025	Department of Climate Change, Energy, the Environment and Water (DCCEEW)	Portal Notification (PAE)	Notice of the proposed development was provided to the DCCEEW. The DCCEEW indicated that it did not have any comments on the proposal.

5.5 WOLLONGONG CITY COUNCIL

Throughout the design development of the proposal, there has been continuous engagement with Wollongong City Council. A summary of these engagement activities and the matters raised in discussions are presented below in **Table 15**. Additionally, these matters are discussed in the Engagement Outcomes Report (**Appendix P**).

Table 15 Record of Wollongong City Council Meetings and Correspondence		
<i>Date</i>	<i>Activities</i>	<i>Purpose</i>
3 October 2025	Email	Request to engage with Wollongong City Council planning team and other specialist technical officers.
18 November 2025	Meeting	Discussion of Early Works SSD project with Council's assessment planner and relevant technical experts.
26 November 2025	Written advice provided.	Council issued written advice and feedback.

5.6 STAKEHOLDER VIEWS

The key issues that were raised by the community and other stakeholders during the preparation of the early works are outlined in **Table 16** below. It is noted that there stakeholder views relevant to the Early Works scope, and only the matters relevant to the early works are listed below. A detailed response to the stakeholder views is provided in the Engagement Outcomes Report (**Appendix P**).



Table 16 Stakeholder Issues	
Key issues	Applicant Response
Transport for NSW	
Geotechnical	The geotechnical matters raised in the correspondence from TfNSW dated 4 December 2025 have been reviewed by the project team and addressed through the technical reports provided with the EIS.
Swept Path Analysis	The vehicle maneuverability matters raised in the correspondence from TfNSW dated 4 December 2025 have been reviewed by the project team and addressed through the technical reports (revised CMTP at Appendix G) provided with the EIS.
Pedestrian Control	The matters pertaining to pedestrian control raised in the correspondence from TfNSW dated 4 December 2025 have been reviewed by the project team and addressed through the technical reports (revised CMTP at Appendix G) provided with the EIS.
Crown Street Access	The matters pertaining to access to Crown Street raised in the correspondence from TfNSW dated 4 December 2025 have been reviewed by the project team and addressed through the technical reports (revised CMTP at Appendix G) provided with the EIS
Truck Loading Area	The matters pertaining to the truck loading area raised in the correspondence from TfNSW dated 4 December 2025 have been reviewed by the project team and addressed through the technical reports (revised CMTP at Appendix G) provided with the EIS
Wollongong City Council	
It is noted that a further state significant development application SSD-97973958 is also under consideration by the Department. That application is titled “Early Works for Shop Top Housing development” and described as an “Amending DA to amend DA-2023/0156”. This was at “Prepare SEARS” stage at the time of issuing these pre-lodgement notes. It was explained at the pre-lodgement meeting and by the officer assessing the application at the department that this application was to facilitate the development currently under assessment as part of SSD-84127221.	Noted. The project team indicated to Council officers the scope of the Early Works SSDA and that it would support the future Main Works SSDA by providing for an expansion to the area where bulk earthworks would be carried out.

5.7 ENGAGEMENT TO BE CARRIED OUT

5.7.1 Ongoing Stakeholder Consultation

The project team remains committed to working with key stakeholders throughout the upcoming public exhibition period to address any issues raised. Further, additional stakeholder consultation will be carried out prior to lodgement of the subsequent Main Works SSD application and any matters pertinent to the Early Works will inform DPHI’s assessment of this SSDA.





In accordance with the SEARs requirement for communications and stakeholder engagement, the Applicant has implemented an engagement strategy that informs the most likely impacted and interested parties, including nearby residents, landowners, businesses and key State government agencies about the proposed development. The responses to this engagement have provided an opportunity for that feedback to be considered in the design process.

5.7.1.1 Exhibition and Assessment

Following the submission of the Early Works SSDA, DPHI will exhibit the EIS on the Major Projects website and invite submissions from State government agencies and the public. Once the exhibition is complete, DPHI may require the Applicant to prepare a Submissions Report in response to issues that have been raised. The Applicant's project team will continue to liaise with DPHI and other stakeholders during the assessment of the SSDA to respond to any issues as they arise.





6. Assessment of Impacts

This section of the EIS assesses and responds to the environmental impacts of the Early Works SSD. It addresses the matters for consideration set out in the SEARs. The list of proposed Mitigation Measures identified to mitigate any environmental impacts are provided in **Appendix T** and complement the findings of this section.

6.1 DESIGN OF EXCAVATION EXTENT

As identified in the project description, bulk excavation is proposed to be carried out within the site in addition to excavation work approved under DA-2023/156. The extent of additional earthworks is shown on the bulk earthworks plans prepared by *BKA Architecture* at **Appendix C**. Excavation will be accompanied by construction and anchoring of a piled shoring wall and capping beam.

The excavation extent is informed by design work associated with the preparation of a future Main Works SSDA and the required carparking areas. The design of the bulk excavation areas has considered the following related matters:

6.1.1 Future Delivery of Deep Soil

The proposed bulk earthworks will maintain the future delivery of deep soil areas around the site, and as such will satisfy the ADG design criteria. Noting a significant portion of the site will be excluded from excavation surrounding the heritage-listed tree. This area will become the Deep Soil Zone for the future Shop Top Housing Development. The proposed Early Works do not impact this part of the site.

6.1.2 Local of Vehicle Entries and Exits

The Early Works proposal will not alter the approved vehicle entry into the site from Parkinson Street. During the early works, construction access to the site will make use of the existing vehicle entrances on Crown Street and Gladstone Avenue.

The proposed additional earthworks will not be in the general vicinity of the right of carriageway access into the site. The additional earthworks proposed by this Early Works SSDA avoid the approved location for vehicle entry/exit.

6.1.3 Consideration of Future Development Envelopes

The approved DA-2023/156 provides the location for future additional development sought by the Main Works SSDA. The proposed Early Works will not seek any changes to the approved podium areas apart from additional earthworks to support a larger underground car parking area by providing a new basement level beneath the approved lower ground level and the expansion of the lower ground level towards the western side boundary.

6.1.4 Accommodation of Parking and Vehicle Circulation Areas

The proposed Early Works SSDA provide for additional excavation to accommodate additional car parking areas required for the new apartments that are proposed in the Main Works SSDA. The depth of the proposed excavation has been designed to allow for an appropriate depth in order that additional car parking and related servicing areas may be provided within the basement levels of the development.



This section of the EIS provides details relevant to the consideration of transport required in item 9 in the SEARs.

6.2.1 Vehicle Site Access and Traffic Routes

As indicated in section 4.4 of the CTMP, vehicle access to the site during bulk excavation works will utilise both Crown Street and Gladstone Avenue to access the site with no access from Osbourne Street. These routes are indicated in **Figure 19** below.



In this regard, large rigid vehicles will approach and depart the site from Gladstone Avenue, thereby avoiding the Crown Street/Osborne Street intersection. Throughout construction, all construction vehicles will be able to approach and depart the site in a forward direction.

During the course of construction, pedestrian movements along the frontage footpath will be maintained as currently available. All construction-related traffic movement along the site's frontages will occur under the



supervision of a trained traffic controller, with trucks being escorted between the site access point and road carriageway to ensure pedestrian safety is maintained at all times.

6.2.3 Materials Delivery

The arrangements for materials delivery under the Early Works SSDA will reflect the approved DA-2023/156. As such, all construction materials will be loaded/off-loaded within the signposted Works Zone and stored within the site's boundary at all times. During the excavation phase of the project, the excavated materials will be loaded/unloaded on the site ahead of removal off site. A tower crane will be erected within the site and specific areas will be available for loading/unloading materials.

6.2.4 Works Zone and No Stopping Zone

A Works zone will be established along the Gladstone Avenue frontage to allow for some vehicles that cannot access the site to stand upon the street. Details regarding the location of the works zone are provided in the CTMP. All required approvals for these areas will be sought from Wollongong City Council and TfNSW.

6.2.5 Parking Impact

During construction work, there will be no on-site parking available for the construction workforce. Workers will be encouraged to use public transport to the site. The CTMP approved under DA-2023/156 provides details on the arrangements that will be implemented during the demolition and construction phase of development to manage the parking needs of the construction workforce.

Workers will have access to some unrestricted on-street parking on surrounding streets. Given the site's proximity to public transport, all workers will be encouraged to utilise public transport services or carpool, where possible.

The developer will provide a tool drop off and storage facility within the site. This will allow tradespeople to drop off and store work tools and machinery on the site, hence allowing them to use public transport to access the site. Arrangements of this service will be communicated to all workers prior to their induction to the site.

6.2.6 Construction Traffic Impact

The total duration of construction works at the site for the development will be approximately two years (2) and the proposal's impact on local traffic conditions has been considered in the assessment of DA-2023/156. Based on the assessment of predicted traffic movements, the frequency of construction traffic vehicle movements are not expected to have an adverse impact on local traffic conditions.

6.3 NOISE AND VIBRATION

A Construction Noise and Vibration Management Plan has been prepared by Acoustic Logic and is provided at **Appendix F**.

The report notes that the site is surrounded by a mix of development types including low and medium residential and commercial land uses. A number of sensitive receivers are located in close proximity to the site.

As indicated in **Figure 20** below, the boundaries of the site are shared with a number of residential properties located to the site's west at No 373 Crown Street (R1), south of the site No 4 Frederick Street (R3) and No 6-10 Gladstone Avenue (R2).

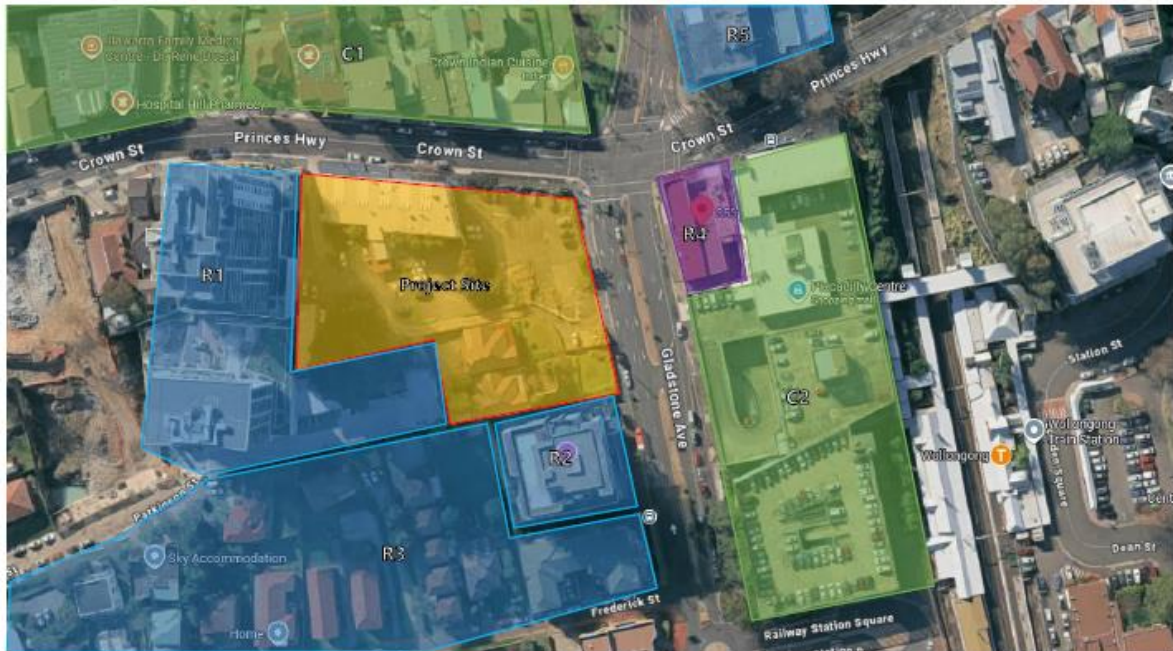


Figure 1: Aerial view of the project site and sensitive receivers.



Figure 20 Nearest Residential Receivers (Source: Acoustic Logic)

6.3.1 Construction Hours

Construction hours for the Early Works will be as indicated below.

- Monday to Friday: 7:00am to 6:00pm
- Saturdays: 8:00am to 3:00pm
- Sundays and Public Holidays: No construction unless by special arrangement.

6.3.2 Construction Noise Assessment

The construction noise report provides a summary of the potential noise and vibration impact undertaken for the proposed early works and construction impacts have been assessed and mitigated as required.

The relevant construction noise criteria for the proposed development is found in the *Interim Construction Noise Guideline* (ICNG)(DECC 2009). These guidelines have been specifically prepared for application to construction noise assessment and identify acceptable noise levels for construction projects.

The proposed development is expected to involve the following construction activities for the Early Works SSDA.

- Boring machine (piling)
- Excavators,
- Concrete pump, and
- Trucks.



The duration of the Early Works that will be undertaken on the site is expected to be approximately 16 weeks during the proposed construction hours.

The predicated noise levels for the proposed Early Works are as detailed in **Table 17** below.

Table 17 Predicted Noise Levels During Early Works		
<i>Activity</i>	<i>Noise level</i>	<i>Approximate Duration</i>
Piling rig	111 dB(A)	16 weeks
Concrete pumps and truck discharging concrete	103dB(A)	16 weeks
Excavator	103 dB(A)	16 weeks
Trucks (removal of spoil)	105 dB(A)	16 weeks

The assessment has identified expected noise levels arising from the Early Works on the site. These have been calculated assuming cumulative noise generating scenario for the worse 15 minutes. The following assumptions have been made:

- Construction noise sources have been assumed to be located at the middle of the project site.
- Construction noise impacts to all receivers have been predicted at the nearest external openings (doors, windows) with 10 dB(A) outside to inside reduction in noise levels (AS 2436 Table B4).

Table 18 Maximum Construction Noise Emission at Critical Boundaries				
<i>Time Period</i>	<i>Location of Residential Receiver</i>	<i>Maximum Predicted LA_{eq} Level dB(A) from Building Works</i>	<i>Site Specific construction noise emission criteria (LA_{eq}(15min))</i>	<i>Criteria Exceeded by / Complied with</i>
Recommended Standard Hours Monday to Friday 7am to 6pm Saturdays 8am to 1pm	R1, R2, R3	60 dB(A) at critical façade (outside) 50 dB(A) inside (windows door open) 40 dB(A) inside (windows door closed 3mm float glazing)	53 dB(A) and less than maximum Highly noise of 75 dB(A)	Exceeds by 7 dB(A) < Maximum Highly noise of 75 dB(A) ok.

The report provides an analysis of the likely noise emissions that are expected to exceed the noise levels during the Early Works stage of the project. It was identified that piling works are the loudest activity and work nearest to the site boundaries will have the most significant acoustic impact.

The Construction Noise and Vibration Assessment report identifies that noise impacts can be minimised through the following measures:

- Noise induction for all site staff.
- Implementation of an appropriate community liaison procedure
- Complaints resolution procedures
- Implementation of monitoring and reporting programmes

If the construction noise levels are predicted to exceed the expected noise levels of the project, the Construction Noise and Vibration Assessment recommends that the following noise mitigation measures be implemented:

- Excessive noisy plant or earth moving equipment are not allowed to operate on the site,



- Provide alternative less noisy equipment when possible,
- No radio or music is to be audible in areas outside the construction site,
- Use of acoustic barriers, noise shields, where feasible and possible,
- Avoid simultaneous noise activities,
- Operating hand-held equipment are to be used inside and away from any window or opening
- Ensure all machines and equipment are well maintained and do not produce excessive noise due to malfunction,
- Avoid dropping material from high levels. Provide rubber matting on the ground when material is to be dropped from high levels,
- All site staff and employees are to use appropriate protective equipment when operating or in the vicinity of a noise generating equipment.

6.3.3 Construction Vibration Impacts

A high level assessment of the construction vibration is provided by *Acoustic Logic* in **Appendix F**. The proposed Early Works includes piling, which is identified as potentially producing significant ground vibration. The other activities are not expected to result in significant ground vibration and/or are sufficiently separated from sensitive receivers.

The report has indicated that the Early Works can be classified as intermittent vibration under the DECCW's '*Assessing Vibration: a Technical Guideline*'. The proposed development is predominantly located on clay/silty ground with weathered shale/sandstone expected at the lowest part of the future basement excavation. Anchored contiguous piling / 'Hit and Miss' piling will likely be required to retain the future basement excavation.

The major sources of vibration are usually caused by a project will include the use of excavators with rock breakers (or grinding heads attached), bulldozers, vibratory rollers and rock anchoring.

The most likely contributing sources of ground vibration during the Early Works of the project will be:

- The drilling and concreting of contiguous piling / 'Hit and Miss',
- Operation of excavators and the movement of trucks removing excavated spoil material,

The assessment report recommends the implementation of a range of vibration mitigation measures, as follows:

- For properties identified at risk from damage, a risk assessment will be undertaken by appropriately qualified and experienced geotechnical and construction engineering experts. Inspections of those properties at risk will be undertaken prior to construction, and a dilapidation report to be produced in accordance with Australian Standard *AS4349.1 Inspection of Buildings*.
- The owners of all properties on which inspections and dilapidation reports are to be conducted will be contacted at least two weeks before the inspection, or as otherwise agreed by the affected property owners.
- Copy of the dilapidation report will be provided to the owner of each property inspected at least one week prior to construction work commencing,
- A register is to be maintained of all properties inspected, indicating whether the owner accepted or refused the property inspection offer.

Any property damage caused directly or indirectly because of construction works will be rectified at no cost to the property owner. Alternatively, property owners will be offered compensation for any damage.

6.4 GEOTECHNICAL IMPACTS

A geotechnical investigation of the site has been carried out by *Foundation Earth Sciences* in the report dated 4 February 2026 at **Annexure L**. The Geotechnical Investigation report was carried out to assess the subsurface conditions of the site and provide advice on the construction methodology for the proposed Early Works.

The Geotechnical Investigation report provides geotechnical advice regarding ground conditions, recommendations and conclusions based on *EI Australia's* investigation work. Based on the results of the Geotechnical Investigation report, it was confirmed that the following was required to be considered for the proposed development:

- Rock excavation and retention,
- Groundwater within the depth of excavation,
- Reactivity of underlying natural clays,
- Existing footings of the neighbouring properties,
- Foundation design for building loads.

For excavation, the report has made several recommendations regarding the excavation methodology due to the high rock strength underlying the site. This will have implications for vibration impacts and will require some flexibility in terms of excavation equipment and methods.

The proposal will ensure that the excavation in the vicinity of the TfNSW asset (Crown Street) is carried out in accordance with the *TfNSW Geotechnical Technical Direction* (GTD) 2020/001 dated July 2020. The requirements of this technical direction will be included into the excavation methodology.

Subject to the implementation of the mitigation measures relating to excavation, foundations and dewatering, it is considered that the proposed Early Works development can be viable from a geotechnical perspective. The recommended mitigation measures are summarised in **Appendix T**.

6.5 GROUNDWATER SEEPAGE AND DEWATERING

The Early Works SSDA is supported by a Hydrogeological Assessment report prepared by *Foundation Earth Sciences* provided at **Appendix U**.

The groundwater investigations found:

"the groundwater inflow analysis concludes that the proposed development with a 'drained basement' option is feasible on the site using industry-standard design and construction techniques. The analysis is based on the groundwater assessment and the likely hydraulic conductivity of the encountered subsurface conditions. There will certainly be variations in the adopted parameters and assumptions, and it is found that the results of the analysis can be within one order of the magnitude. Since the parameters are adopted with higher-end value, based on our experience, the actual groundwater inflow into the basement is more likely to be less than what is estimated in this report. However, if large open water-bearing defects are encountered within the basement excavation, they can be controlled by grouting the defects. The analysis indicates that a 'Solider Pile' wall with a shotcrete infill system is feasible for the encountered groundwater. This report does not justify that the adopted shoring wall system is adequate for the ground movement. It is recommended to assess and confirm the potential ground movement for the adopted shoring wall system before the construction stage".

Subject to the implementation of mitigation measures relating to excavation, foundations and dewatering, it is considered that the proposed development can be geotechnically viable. The recommended mitigation measures are summarised in **Appendix T**.

6.6 FLOODING

A Desktop Flood Report has been prepared by *S&G Consultants* at **Annexure K1**. The report provides an assessment of the hydraulic behaviour of the site and proposed development's susceptibility to any flooding related impacts. It is noted that the site is not affected by flooding as depicted in the Wollongong City Flood Study 2019.

The relevant Hazard Vulnerability Classification for the site and surrounding land is shown below in **Figure 21**.



Figure 21 Extract of Wollongong City Flood Study Hazard Vulnerability Classification Map

Based on a review of this information, it is understood that:

- The site is not impacted by flooding for all range of storms up to and including the PMF;
- The site is located on the upstream end of the catchment with Crown Street being the watershed of the catchment;
- Because the site is not inundated, the increased flood risk associated with the intensification of the site is nil;
- Evacuation from the site is not an issue as well as Crown Street is flood free so access to and from the site during floods is available.

Based on the above findings, the site and the adjacent roadways are not affected by any mainstream flooding and the requirements of the Council's DCP do not apply.

6.7 WATER CYCLE MANAGEMENT

6.7.1 Integrated Water Management

An Integrated Water Management Plan has been prepared by *S&G Consultants* and is provided at **Appendix K2**.

The Integrated Water Management Plan has provided an overview of the relevant Wollongong City Council DCP requirements including stormwater management, water quality, overland flow management and soil and water management during construction.

During the implementation of the Early Works, a combination of standard erosion and sediment control measures will be implemented in accordance with the Landcom publication *Blue Book (Managing Urban Stormwater: Soils and Construction)*. The key measures proposed shown in **Figure 22** and include:

- Erection of silt fences,
- Sediment basin,
- Pump and filtration unit,
- Stockpile areas,
- Discharge point at site boundary, and
- Construction exit protection on Gladstone Avenue,

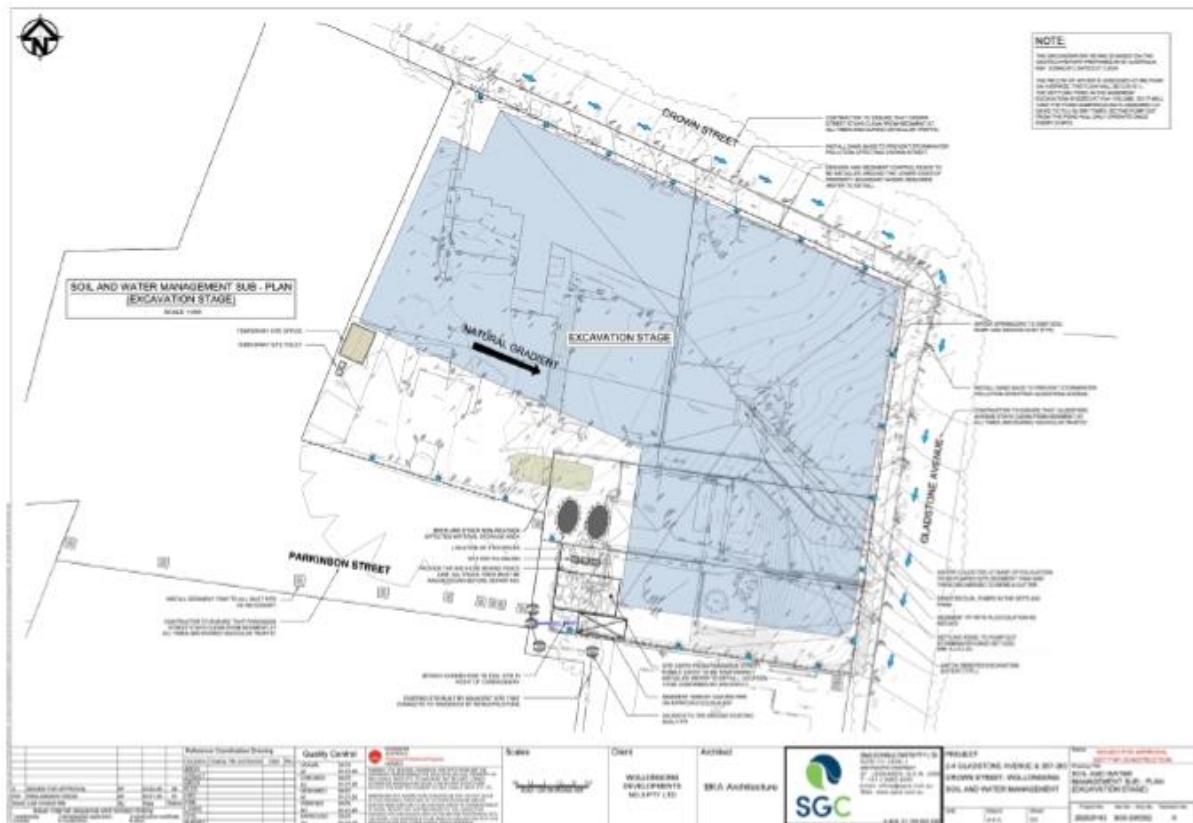


Figure 22 Erosion and Sediment Control Plan



6.8 ABORICULTURAL IMPACTS

An Arboricultural Impact Assessment has been specifically prepared for the Early Works SSDA by *Seasoned Tree Consulting* and is included at **Annexure H**. The report outlines the measures required to maintain the health of the trees located within the site and other trees external to the site that are to be retained.

The site includes a heritage-listed Morton Bay Fig (*Ficus macrophylla*) that will be retained and protected at all times to ensure its health and longevity. As identified in the Arboricultural report, fenced areas will be provided to the Tree Protection Zones (TPZ). No works will be permitted within the TPZ fenced areas unless confirmed by the project's arborist.

All excavation and site works must comply with the recommendations provided in the Arborist report.

6.9 WASTE MANAGEMENT

A Construction and Demolition Waste Management Plan for construction of the Early Works has been prepared by *Elephant's Foot Consulting* and is included at **Annexure H2**. The construction and demolition WMP outlines the waste management strategies for the proposal during the construction of the Early Works.

Section 4 of the plan provides details of the estimated waste volumes for the project's early works stage. These estimates are provided in **Table 19** below.

Table 19 Early Works Estimate of Proposed Waste			
Material	Volume (m ³)	Mass (tonnes)	Approximate percentage recovered
Excavation material	257	461	100%
Concrete	36.25	87	95%
Metals	120.75	966	98%
Totals	414	1514	-

The plan has estimated that most of the construction waste associated with the early works will be diverted from landfill.

The early works construction and demolition WMP is aligned with the waste management plan for the Main Works SSDA so that they both work together once the early works are completed and the main works commence.

The recommendations of the Construction and Demolition WMP have been incorporated into the Table of Mitigation Measures in **Appendix T**.

6.10 HERITAGE

6.10.1 Aboriginal Cultural Heritage

An Aboriginal Heritage Impact Assessment report has been prepared by *Artefact Heritage and Environment* (**Appendix N**). The report provides the results of an Aboriginal Heritage impact Assessment (AHIA) that has followed the requirements of the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (2010). The report also provides recommendations regarding the need for a Aboriginal Cultural Heritage Assessment (ACHAR).

In summary, the assessment has found:



- there is extensive historical ground surface modification within the study area,
- the study area is located on a slope, conducive to erosion,
- there are no landforms indicating the likely presence of Aboriginal objects in proximity to the study area,
- the study area does not contain any identified Aboriginal objects,
- desktop research and the site inspection indicate that unidentified Aboriginal objects are unlikely to be present in the study area.

Based on these findings, the assessment has concluded:

- there are no known Aboriginal objects or places located within the study area,
- the study area is not likely to contain Aboriginal objects,
- as no Aboriginal objects or places will be harmed as a result of the proposed works an Aboriginal Cultural Heritage Assessment Report (ACHAR) is not recommended.

6.10.2 Environmental Heritage

It is noted that the site is a local heritage item as a consequence of being listed in the *Wollongong Local Environmental Plan 2009* as a heritage item (Landscape) within Part 1 of Schedule 5.

The description of the listing is shown below in **Table 20**.

Table 20 WLEP Heritage Listing Description				
Item Name	Address	Property Description	Significance	Item No.
Moreton Bay Fig	363-373 Crown Street	Lot 1 DP 201949 Lot 100 DP 1214547	Local	6290

The inventory sheet for the item provides the following description for the item:

"The Moreton Bay Fig adjoining the Masonic Temple is of significance for the local areas as a notable, aged, rare and representative example of this tree species which presents a local landmark. It is alleged that the tree is associated with the early days of the Free Masonic movement in Wollongong".

The site is also within the vicinity of Wollongong Railway Station which is listed on the State Heritage Register and several other local items.

6.10.2.1 Heritage Impact

The Early Works SSDA is supported by a Statement of Heritage Impact (SoHI) report prepared by *Heritage 21* and provided in **Annexure M**.

An assessment of the proposed early works is provided in section 6.2 of the report. The key findings of the report are provided below:

"The approval of DA-2023/156 included the carrying out of the nominated early works across part of the site. This application seek consent to extend the area of those approved works to certain other areas of the site. Heritage 21 notes that the former buildings on the site have now been demolished as per the approval of DA-2023/156. Therefore, the proposed extension of these areas would not impact on any built heritage or fabric and due to being sub-surface, would not result in a visual impact to the nearby heritage items or the streetscape".

"No excavation would be undertaken in the tree protection zone (TPZ) or structural root zone (SRZ) and as indicated on the plans shown in section 5, a buffer zone has been provided around the tree, to ensure



that the proposal would not impact the tree's integrity. Further mitigation measures and landscaping to ensure continued health of the tree have been provided in SSD-84127221. Heritage 21 has also provided a mitigation measure in section 7, recommending that care and protection plans be developed in conjunction with the arborist while undertaking the proposed works".

For the reasons explored above, Heritage 21 is of the opinion that the proposal would not have a detrimental impact on the subject site and the heritage item Moreton Bay Fig

Section 7.2 of the SoHI has proposed mitigation measures to ensure maximum conservation of the significance of the site and the Moreton Bay Fig. The measures are included in the Table of Mitigation Measures (**Appendix T**).

6.10.2.2 Archaeological Assessment

Condition 46 of DA-2023/156 requires historical archaeological test excavations to be undertaken to identify if any evidence of Gladstone House remain and to assess and determine if any additional archaeological excavation and recording measures are required. Test excavations (within two test trenches (TT1 and TT2) were carried out in accordance with a section 139 permit between 12 and 17 June 2025. The results of the archaeological excavations are summarised in a report prepared by *Sustainable Heritage* dated 25 June 2025.

The key findings of the archaeological assessment are summarised in **Table 21** below.

Table 21 Summary of Archaeological Assessment	
Research questions	Responses
What was identified at the site? What kinds of features and deposits? Where were the relics located?	Relics associated with Gladstone House were identified within the western portion of TT1 and the central northern portion of TT2. Evidence identified as relics include brick footings, artefact bearing internal deposits/contexts and associated clay packing and cuts. The sandstone and flint rough hewn surface associated with the structure(s) identified in TT2 has also been analysed as a relic/resource associated with the historic habitation of Gladstone House. The date of this surface could not be verified by likely nineteenth century. Evidence of mid-twentieth century and twenty first century redevelopment of the proposal area was also identified and not analysed as relics.
When were these features or deposits created? How are they phased against the site historical analysis?	The brick footings identified as relics have been analysed as associated with Gladstone House constructed in the 1840s/1850s. The initial analysis of the individual bricks appear to be unique with the anchor markings where not identified in the 1986 Warwick Gammell The Brickmakers of NSW book or online resources. As such the bricks used to create the footings for the structures identified appear to be locally made between 1830s and 1870s. Additional excavation and analysis is required to confirm the initial analysis.
What site formation processes have occurred? What happened at the site?	The test excavations identified broadly three phases that formed the site as seen in 2025: • Gladstone House (1840s/1850s – 1950s) • Demolition and levelling and stabilisation fill (1950s redevelopment of the proposal area) • Carpark and utilities (Post 1950s to the 21st Century subgrade, bitumen surface and water and sewer utilities) The formation processes show occupation of Gladstone House (1840s/1850s – 1950s) and the occupation of the proposal areas as a carpark used for the medical building development was constructed in the 1950s.
What contexts, phases, and activity areas are evident, and how are these	The test excavations were limited to identifying the presence and/or absence of relics and artefact bearing deposits. Due to the limited nature of the excavations this question cannot be fully answered until salvage excavations have been undertaken.



Table 21 Summary of Archaeological Assessment

demonstrated by the various excavation units?

Compare the results with other relevant sites, related projects, and current research. How does the project fit into the broader, regional framework and theoretical models if they exist?

Wollongong was established as a rural agricultural and timber getting area with large estates established from 1815 onwards. Despite the township of Wollongong declared in 1834 the western estates remained on the fringes of the fledgling town until the early 19th century. The proposal area is unique in the region as an Estate belonging to a member of the Osborne family a significant and prolific family instrumental to the colony and especially the Illawarra region.

Little historical archaeological research and excavation has been undertaken on the early estates west of the township of Wollongong, especially of a family that was instrumental in Wollongong and colonial politics. Land use alterations are vital in understanding how the region grew and developed and the sue of Gladstone House by the Osborne family for almost 100 years could provide an insight to the development of the region from the earliest development of Wollongong until post-WW1.

The archaeological relics and deposits identified in the test excavation support this assertion and additional excavation is required to realise the full potential and analysis of Gladstone House, a significant estate in the Wollongong and Illawarra area until the early-mid 20th century.

Indicate how and/or why the subject site differs from other sites. How does this site compare to others?

The archaeological resources directly related to Gladstone House including foundations and bricks that have previously not been identified in the Illawarra and possibly NSW more broadly. It is likely that the materials used to construct Gladstone House are a local response to the initial development of Wollongong and the surrounding Estates. The proposal area might be able to provide additional information on the localised response to regional development in the colony that other sites within Wollongong and Illawarra region have not been able to provide.

Additionally, the continued use of Gladstone House by the prominent Osborne family might be able to inform us of the social responses to change and advances in technology, planning and utilities. The longevity of the familial connection to the proposal area might also be able to provide evidence of social and economic decline and changes of the Osborne family within the artefactual record and potential variations and differences in the quality of residential upgrades.

Few properties within Wollongong and the Illawarra can provide such a broad range of answers from the earliest occupation through to the mid-20th century.

6.11 CONTAMINATION AND REMEDIATION

Remediation works are to be carried out in accordance with the Detailed Site Investigation (DSI) prepared by *Ei Australia* (**Appendix I**) and other previous investigations carried out at the site between 2019 and 2023.

The DSI has found localised contamination around four former underground storage tanks and associated UPSS infrastructure remaining on the site. The remediation of localised contamination and removal of the UPSS is required. It is the opinion of *Ei Australia* that the site can be made suitable for the proposed mixed-use (residential/commercial) development subject to the following three (3) recommendations:

- An addendum to the Remedial Action Plan (RAP) prepared by *Reditus* (2020) should be prepared to address the additional sites and updated information, providing details of the methodology and procedures required for effective site remediation;
- A Hazardous Materials Survey should be undertaken prior to the commencement of any demolition works;

- As a precautionary measure, an asbestos clearance inspection and certificate should be completed by a suitably qualified professional following removal of fill from 357 Crown Street.

These have been included in the Table of Mitigation Measures (**Appendix T**).

6.12 SOCIAL IMPACTS

It is a requirement of the SEARS to consider any social impacts of the proposed development and should any significant social impacts be identified, a separate Social Impact Assessment (SIA) is to be prepared. Noting that the proposed early works are limited to an extension of bulk earthworks already approved under DA-2023/156, these works are unlikely to give rise to additional social impacts beyond those that were identified and resolved as part of the assessment of that development application.

It should be noted that a detailed SIA has been prepared for the Main Works Amending SSDA (SSD-84127221), in accordance with the *Social Impact Assessment Guideline for State Significant Projects* (DPHI). The preparation of that SIA has identified the potential for temporary impacts during construction work at the site (ie. until the construction works for the entire project scope are complete). A range of mitigation measures are proposed to minimise this impact.

Based on the methodology, considerations and outcomes of the SIA, a due diligence assessment has been undertaken for the anticipated impacts for the of the proposed early works. This also considered the existing approval conditions in addition to:

- the scope and scale of the proposed additional excavation,
- the duration and intensity of early works,
- the existing social environment, including nearby residential areas, businesses, community facilities, pedestrian networks and sensitive receivers,
- the community's existing exposure to construction activities, and
- temporary changes to amenity, access, and local conditions

The early works are temporary and construction focused in nature; therefore, the level of assessment undertaken is proportionate to the short-term and localised nature of the expected impacts.

The assessment identified there is potential for social impacts associated with the bulk earthworks (ie. the subject of this proposal), primarily resulting from noise and vibration impacts experienced by nearby residents. The assessment has found these impacts to be mostly temporary in nature and, with effective management practices, the impacts can be mitigated (refer **Appendix T**: Mitigation Measures). Some wider minor positive flow-on impacts were also identified, including facilitating new residential accommodation (including associated parking) and employment opportunities through increased construction activities.

Table 22 below considers the identified social impact and outlines the recommended project responses to mitigate this impact.

Table 22 Social Impacts Relevant to Proposed Early Works SSDA			
Potential Impact	Key Impact communities	Impact dimensions	Recommended project responses
Temporary disruption to daily routines during construction and amenity impacts related to construction.	Immediate nearby residents	Possible/minor Medium (Negative)	• Implement a Construction Management Plan with protocols for pedestrian and vehicle safety.

Table 22 Social Impacts Relevant to Proposed Early Works SSDA

It has been identified that nearby residents and businesses may be impacted by construction activities, including residents of surrounding existing residential dwellings.	• Implement a complaints management system during construction to ensure residents have a process to report any issues. • Regular construction notification letters inform nearby residents activities (particularly noisy activities) or any changes to vehicle access conditions • Avoid high construction traffic generation during peak travel hours.
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As these impacts can be mitigated, the preparation of a comprehensive SIA is not required to accompany the Early Works SSDA.

6.13 CONTRIBUTIONS

The relevant contributions plan for the proposal is the *Wollongong City-Wide Development Contributions Plan 2025*. The plan provides different levy rate for land within the Wollongong city centre as indicated in Figure 2 of the Plan. In accordance with section 209(1) of the EP&A Regulation 2021, the rate of the levy for development carried out within the Wollongong City Centre is 2%. A monetary contribution equivalent to 2% of the project's EDC will be levied by DPHI and paid to Wollongong City Council.

6.14 OTHER ISSUES

An assessment of the other impacts of the development has been undertaken by the relevant specialist consultants and other issues have been assessed as required in **Table 22** below.

Table 23 Other Issues

SEARs	Issue	Appendix	Assessment
6	Built Form	N/A	The proposed development only relates to the Early Works at the site, with works limited to bulk excavation and shoring of excavated areas. The proposed development will not result in any built form or physical buildings. The bulk earthworks plans are provided at Appendix C which show the extent of the basement excavation and show that no built form is proposed. The subsequent Main Works Amending SSDA (SSD-84127221) will address future built form at the site and assess its impacts in detail. SSD-84127221 will include a full architectural design package (including a Design Report and Design Verification Statement).
7	Environmental amenity	N/A	As noted above, the Early Works do not include construction of buildings. As such, there will be negligible amenity impacts on the surrounding locality with respect to solar access, visual privacy, view loss and view sharing, as well as wind, lighting and reflectivity. As such, shadow diagrams and an assessment against Chapter 4 of the Housing SEPP (including the criteria within the Apartment Design Guide) is not relevant. The Main Works Amending SSDA (SSD-84127221) will address future built form at the site and assess environmental amenity impacts in detail.

Table 23 Other Issues

8	Visual Impact	N/A	As noted above, the Early Works SSDA does not include the construction of buildings and is limited to sub-surface non-visible works. The subsequent Main Works Amending SSDA (SSD-84127221) will address the visual impact of the proposed development at the site and assess the impacts in detail, including provision of a Visual Impact Assessment (VIA).
9	Operational Transport	N/A	The proposed Early Works Amending SSDA do not compromise any built form or physical buildings, therefore there will be no increase in operational trip demand from residents, visitors or employees. The Main Works Amending SSDA (SSD-84127221) will provide a traffic impact assessment in accordance with the Guide for Traffic Impact Assessment, published by TfNSW. A preliminary CTMP is provided with the EIS in accordance with the SEARs.
14	Trees and Landscaping	N/A	The proposed Early Works Amending SSDA do not include landscaping on the site, and as such a Landscape Plan is not required at this stage. The Main Works Amending SSDA (SSD-84127221) will provide a Landscape Plan that details the proposed planting on the site. The proposed excavation extent allows for the retention of the existing heritage-listed Moreton Bay Fig Tree and deep soil planting.
15	Ecologically Sustainable Development (ESD) and BASIX	N/A	The proposed development only relates to the Early Works at the site, with works limited to bulk excavation and shoring of excavated areas. The proposed development will not involve any built form or physical buildings. The Main Works Amending SSDA (SSD-84127221) will include an ESD report and BASIX certificate for the new development proposed.
16	Biodiversity	Appendix B	The proposed development is in a highly urbanised area without significant vegetation (apart from the one heritage listed tree to be retained) and therefore is unlikely to impact a matter of National Environmental Significance. Therefore, the proposed development is not required to be referred to the Commonwealth Department of Environment to determine if it constitutes a 'controlled action' and the bilateral agreement applies. A BDAR waiver has been issued and is provided at Appendix B .
20	Bushfire Risk	N/A	The development is not located on mapped bushfire prone land and a bushfire threat is not identified on or adjoining the site. As such a bushfire assessment detailing bushfire protection measures and compliance with Planning for Bushfire Protection is not required for this SSDA.
21	Aboriginal Cultural Heritage	N/A	The Due Diligence report / ACHAR prepared by <i>Artefact Heritage</i> for the Main Works Amending SSDA (SSD-84127221) concludes there is nil-low potential for Aboriginal archaeological resources and low potential for historical archaeological resources to be present within the site.
23	Public Space	N/A	The proposed early works do not include embellishment of public domain and landscaping on the site, and as such, a Public Space Plan is not required. The subsequent Main Works Amending SSDA (SSD-84127221) will address this SEAR as required.
24	Hazards and Risk	N/A	Following a Dial Before You Dig (DBYD) search of the site and surrounds there are no items that warrant a hazards assessment to be undertaken.



7. Project Justification

The proposed Early Works Amending SSDA includes bulk excavation and construction of piled shoring wall and capping beam works that are described in Section 3 of this EIS. The assessment must, therefore identify and consider the effects of the proposed changes to the site's condition in the Early Works SSDA.

In considering the justification of the proposed Early Works and in reference to section 4.15 of the EP&A Act, which specifies matters for consideration a consent authority must consider in determining a development application, the following matters have been considered:

- Arrangement of the Early Works, including actions that may be taken to avoid or minimise the impact of the Early Works while still achieving the objectives of the project,
- Consistency with the strategic context,
- Consistency with the statutory requirements,
- The likely impacts of the Early Works, including environmental impacts on both the natural and built environments, also any social and economic impacts,
- The suitability of the site for the development, and
- The public interest.

7.1 CONSISTENCY WITH THE STRATEGIC CONTEXT

The Early Works SSDA facilitates the future development that is consistent with the relevant strategic planning framework.

The Early Works will:

- Support the achievement of regional and local planning goals by laying the groundwork for increased housing supply in an accessible, well-connected location that is approximately 100m from Wollongong Railway station,
- Facilitate a future development that will reflect key strategic priorities relating to design excellence, environmental sustainability, integrated transport and connectivity,
- Directly address the current housing affordability and supply crisis by facilitating the future delivery of a significant quantum of apartments, including affordable housing, in the Wollongong City Centre, and
- Facilitate an activated development at street level that will enhance the vibrancy of the location and provide for the convenience of future residents.

7.2 CONSISTENCY WITH THE STATUTORY PROVISIONS

The relevant statutory provisions have been discussed in Section 6 of the EIS and within a compliance table located in **Appendix O**.

Specifically, this EIS has addressed each of the relevant matters identified in the SEARs dated 12 November 2025 (refer to **Annexure A**) and sections 190 and 192 of the EP&A Regulation 2021.



7.3 ENVIRONMENTALLY SUSTAINABLE DEVELOPMENT

Section 193 of the *Environmental Planning and Assessment Regulation 2021* outlines four (4) principles of ecologically sustainable development. They are:

- The precautionary principle,
- Inter-generational equity,
- Conservation of biological diversity and ecological integrity, and
- Improved valuation, pricing and incentive mechanisms.

An analysis of these four (4) principles is provided in the following sections.

7.3.1 Precautionary Principle

The precautionary principle is utilised when uncertainty existing about potential environmental impacts. It provides that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. The precautionary principle requires careful evaluation of potential impacts in order to avoid, where practicable, serious or irreversible harm to the environment.

This EIS and its supporting reports have not identified any serious threat of irreversible damage to the environment and therefore, the precautionary principle is relevant to the proposal.

7.3.2 Intergenerational Equity

Intergenerational equity is concerned with ensuring that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations. The proposal has been designed to benefit from both the existing and future generations by:

- Creating opportunities for employment near homes and public transport during construction of the Early Works,
- Providing safeguards and measures to protect environmental values, including efforts for erosion and sediment controls, reduced waste to landfill and reduced potable water consumption,
- Facilitating the opportunity for future housing supply for a diverse range of residents, renters, and affordable housing tenants, thereby assisting current future generations access to a diverse range of high amenity housing,
- Facilitating the opportunity for future homes in close proximity to jobs and public transport, allowing residents to access their places of work conveniently and with the potential to reduce car dependency, and
- The consolidated list of mitigation measures (**Appendix T**) outlines measures to safeguard and protect the environment.

The proposal has integrated short and long term social, financial and environmental considerations so that any foreseeable impacts are not left to be addressed by future generations. Issues with potential long-term impacts, such as waste disposal, would be avoided and/or minimised through construction planning and the application of safeguards and management measures described in this EIS.

7.3.3 Conservation of Biological Diversity and Ecological Integrity

The principle of biological diversity upholds the conservation of biological diversity and ecological integrity should be a fundamental consideration. The proposal would not have any significant effect on the biodiversity and ecological integrity of the site, as confirmed in the BDAR Waiver (**Appendix B**).



7.3.4 Improved Valuation, Pricing and Incentive Mechanisms

The principle of improved valuation and pricing of environmental resources requires consideration of all environmental resources which may be affected by a proposal, including air, water, land and biodiversity. The proposal provides for mitigation measures that assist with avoiding, reusing, recycling and managing waste during construction of the Early Works to ensure that resources are used responsibly in the first instance.

7.4 OBJECTS OF THE EP&A ACT

The proposal is consistent with the relevant Objects of the Act as listed in section 1.3 of the EP&A Act and will not result in any unjust or significant environmental impact. Specifically, the proposal is consistent with the Objects of the Act as discussed below in **Table 23** below.

Table 24 Objects of the EP&A Act	
Object	Comment
(a) To promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources.	The proposed Early Works promote the social and economic welfare of the community for the following reasons: • Facilitating the future delivery of dwellings in a highly accessible and high amenity area to support the critical shortfall of housing options and the requirement to deliver 9,200 new dwellings in the Wollongong City LGA by 2029. The future supply will significantly support the need for additional dwellings (market and affordable rental) options in the Wollongong city centre. • Will address the recognised shortage in housing supply across the Illawarra region, which has been made worse by the current housing affordability crisis in NSW. • The early works will support construction jobs and future operational jobs during the sequential phases of the development.
(b) to promote the supply, delivery and maintenance of housing, including affordable housing,	The proposed Early Works facilitate a future development that will directly address this object as it will enable the provision of affordable housing dwellings.
(c) to promote productivity through the development and management of the State and its resources,	The Early Works will provide an acceptable response to the management of the State's resources including groundwater through the return of stormwater and groundwater to the natural environment.
(d) to protect the environment, including the conservation of threatened species of native animals and plants and ecological communities and their habitats,	The BDAR Waiver at Appendix B confirms that the Early Works will not impact biodiversity values, including threatened and other species of native animals and plants, ecological communities and their habitats.
(e) to promote resilience to climate change and natural disasters through adaptation, mitigation, preparedness and prevention,	The Early Works on the site have considered relevant natural hazards noting that the site is not exposed to bushfire risk, flooding or coastal hazards.
(f) to promote the sustainable management of built and cultural heritage, including Aboriginal cultural heritage,	The proposed Early Works promote the sustainable management of built and cultural heritage for the following reasons: • The proposal will not harm any Aboriginal objects or heritage. • The Main Works SSDA proposal is supported by a Connecting with Country report that has made recommendations to ensure the development will be designed with Country.

Table 24 Objects of the EP&A Act

(g) to promote good design, amenity and the proper construction and maintenance of built environments, including the protection of the health and safety of the occupants of buildings,	The proposed Early Works will facilitate a future development that has been designed by BKA Architecture and subject to review by the State Design Review Panel (SDRP) at two briefings held in August and October 2025.
(h) to provide opportunities for participation in environmental planning and assessment,	As outlined in section 5 of this EIS, the Applicant has undertaken considerable engagement with stakeholders as required by the SEARs and in accordance with the DPHI's <i>Undertaking Engagement Guidelines for State Significant Projects</i> .
(i) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,	Although the proposed Early Works do not comprise buildings, they do facilitate ecologically sustainable development as they will support an approved shop top housing development and a future Main Works SSDA project that both have taken into consideration the principles of ESD.
(j) to promote a proportionate and risk-based approach to environmental planning and assessment,	The proposed Early Works will be assessed under the SSD pathway and include assessment of all relevant assessment criteria under the EP&A Act and Regulations.
(k) to promote the orderly and economic use and development of land.	The proposed Early Works allow for the promotion of the orderly and economic use of and development of land for the following reasons: • Facilitating the future delivery of dwellings in a highly accessible and high amenity area to support the critical shortfall of housing options and the requirement to deliver 9,200 new dwellings in the Wollongong City LGA by 2029. The future supply will significantly support the need for additional dwellings (market and affordable rental) options in the Wollongong city centre. • Will address the recognised shortage in housing supply across the Illawarra region, which has been made worse by the current housing affordability crisis in NSW. • Provide for a development that is consistent with the WLEP zoning controls and objectives.

7.5 SIGNIFICANT LIKELY IMPACTS OF DEVELOPMENT

Having regard to the significant likely (natural environment, built environment and economic and social impacts) of the proposed development, the significant likely impacts are considered acceptable as outlined in the following sections.

Additionally, the proposed mitigation measures detailed in section 8 of this EIS and **Appendix T** outlined mitigation and management measures that will minimise the impact of the proposed development.

7.5.1 Biophysical

The environmental impact assessment (Section 6) demonstrates that:

- The proposed early works will not have any significant effect on threatened species, populations or ecological communities or their habitat arising from the construction or uses of the proposed development. The proposal will not have an impact on any matters of national environmental significance under the *Environmental Protection and Biodiversity Conservation Act 1999* (C'wth), or *Biodiversity Conservation Act 2016*; and

- The proposal will not result in any undue adverse environmental impacts. Potential sources of risk associated with the construction works of the early works can be managed with the appropriate safeguards and mitigation measures outlined in this EIS.

7.5.2 Social and Economic

The proposal's social and economic impacts include:

- Facilitating the future delivery of dwellings in a highly accessible and high amenity area to support the critical shortfall of housing options and the requirement to deliver 9,200 new dwellings in the Wollongong City LGA by 2029. The future supply will significantly support the need for additional dwellings (market and affordable rental) options in the Wollongong city centre.
- Will address the recognised shortage in housing supply across the Illawarra region, which has been made worse by the current housing affordability crisis in NSW.
- The early works will support construction jobs and future operational jobs during the sequential phases of the development.
- The proposal will facilitate the revitalisation of a highly neglected precinct of the Wollongong city centre.

7.6 SUITABILITY OF THE SITE

Having regard to the characteristics of the site and its immediate surrounding context, the proposed development is suitable for the site for the following reasons:

- The site is zoned E2 Commercial Centre, which permits the proposed land uses that the early works relate to.
- Facilitates future delivery of high quality, diverse affordable housing, improving affordability in the Wollongong city centre.
- Will result in minor environmental impacts that can be appropriately managed and mitigated.
- The proposed Early Works are supported by a construction waste and traffic methodology that will limit impacts to surrounding development. The local road network and traffic intersections have been assessed to be suitable to accommodate the traffic volumes generated by the proposed construction works, with no adverse impacts on performance and safety.
- The proposed Early Works will have limited impacts to surrounding residential developments having regard to predicted acoustic and vibration impacts during construction works.
- The site is not subject to any environmental constraints.

7.7 PUBLIC INTEREST

Having regard to the public interest, the proposed development is in the public interest for the following reasons:

- The early works will facilitate a development that will be a direct response to the strategic vision and objectives for the delivery of additional housing supply, referenced in the following documents, National Housing Accord 2022, Housing 2041, as well as the Illawarra-Shoalhaven Regional Plan 2041. This includes the delivery of well-located homes, including affordable housing in highly accessible locations.
- Direct employment opportunities will be created during the construction phase of the proposed development.
- It complies with the relevant statutory development standards and development controls.
- Will not give rise to any adverse built environment impacts, including heritage, overshadowing, streetscape and public domain.

- The early works retain the required payment of a monetary contribution to Wollongong City Council under DA-2023/156.



8. Mitigation Measures

A consolidated list of mitigation and management measures for the proposed Early Works SSDA has been prepared and is provided in **Appendix T**. These address potential impacts associated with the following matters:

- Noise and vibration,
- Construction traffic,
- Groundwater
- Geotechnical,
- Construction waste management,
- Contamination,
- Water Management
- Flooding,
- Heritage,
- Aboriginal Cultural Heritage,
- Aboricultural impacts.





9. Conclusion

The EIS has been prepared to consider the natural environment, built environment and social and economic impacts of the proposed early works associated with a future mixed-use development with concurrent rezoning, subject to a separate to a separate Amending SSDA. The EIS has addressed the assessment requirements outlined in the SEARs (**Appendix A**) and is consistent with sections 190 and 192 of the EP&A Regulation with regard to consideration of the relevant environmental planning instruments and social and environmental impacts resulting from the proposed early works.

Appropriate mitigation measures have been identified to manage the impacts of the early works through the execution of the works, noting that these potential impacts are inevitable for early works like this as it facilitates the redevelopment of the site that has been zoned for renewal as high density residential accommodation.

