

Leigh Forsyth
(Strata Committee Secretary)
For and on behalf of the owners and residents of apartments in Eclipse (16-20 Belmore Street)
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To: Director- State Significant Development Assessments
Department of Planning, Housing and Infrastructure

4 Parramatta Square, 12 Darcy Street
Parramatta N.S.W 2150

SUBMISSION OF OBJECTION

Project Name: 120-122 Smith Street, Wollongong (Keira Place- Stage 2)

Application Number: SSD-83956963

Objector Location: 16-20 Belmore Street, Wollongong N.S.W 2500
(South /South West of Site)

An expansive planning document, **The Flinders Street Precinct Urban Design Framework** was endorsed by Wollongong City Council for public exhibition and officially approved and adopted on the 25th May 2026. This document sets out in great detail the Urban Plan for what is known as the Northern Gateway to the Wollongong Central Business District and has provided precise detail on the vision to take the precinct well into the future taking into account: build form, height, views, flooding and access, and forecast population growth.

With a theme of growth in development being commensurate with growth in population the height restrictions were set at existing 24 metres (6-8 storeys) within the precinct. (# see Note at bottom re. population growth)

[Height restriction zones are established by the Wollongong City Council via the Wollongong Local Environmental Plan and must be approved by the NSW Government's Department of Planning, Housing and Infrastructure.]

This was successfully challenged by 'Blaq' in the Land and Environment Court as they were looking to take advantage of the Affordable Housing initiative for its Brooklyn Square development (located in this precinct) which allows up to a 30% increase in height of the proposed development if a percentage of the build is dedicated Affordable Housing.

This brought the height restriction to 40 metres.

Following the ruling by the Land and Environment Court a recommendation to change the height restrictions for some development zones from the standard 24 metres up to 40 metres (equivalent to 11- 13 stories) was determined. This precinct was included in this zoning determination.

A number of developments have been in the pipeline within this precinct, some of which have already passed through council and are under construction. (Brooklyn Square - identified above, Gallery, and Keira Place - Stage 1). All these developments are within the height levels mandated for the Precinct.

Still awaiting approval is the old Bunnings site (which also proposes accommodation, retail and an affordable housing component and is within the height restrictions mandated), the 15-storey development at 2-8 Belmore Street, **a 36 Storey development in Station Street North Wollongong** and the **Keira Place Stage 2 which is now requesting to develop 3 towers on site, two of which clearly fall well outside the height restrictions determined by the endorsed levels.**

There are a number of key issues surrounding the Keira Place development which question the validity and relevance of the exhaustive work (not to mention cost to rate payers) undertaken to present AND ADOPT the *Flinders Street Precinct Urban Design*. These are outlined below and address the key drivers of the plan:

1. The *Flinders Street Precinct Urban Design*

This was commissioned by the Wollongong City Council and adopted in May 2026 establishing a clear strategic vision for what will be the Northern Gateway into the Wollongong CBD. It clearly designates the precinct as a 'transitional, mid-rise zone capped at 15 stories (40 metres), which is inclusive of the State Government's Affordable Housing 'height discounts' to protect the city's long existing character. Reference in the D.A to the development being in keeping with Is totally inaccurate

A proposal to build a 30-storey (103.7 metre) and a 24-storey (75-80 metre) tower represents a more than four-fold increase on the original height restrictions mandated for this precinct (24 metres). To approve its build will set a dangerous precedent going forward and send a message to other developers that they can ignore local environment plans, consequently leading to uncontrolled high-rise sprawl. Any approval would clearly undermine and disregard years of strategic planning and community consultation, shifting the precinct from an 'inviting arrival boulevard' to a high density, high-rise cluster similar to Sydney CBD or the Gold Coast strip.

2. *View Protection Corridors*

The Feasibility Study presented by the developer suggests that by situating the three towers on the western side of the site running south to north with the highest (30 storeys) at the southern end, middle tower (24 storeys) and the lowest (12 storeys) to the north that the *impact to residents on the southern fringes will be 'medium & low'*.

The photographs provided by the developer are at least six years old. The view, taken from the southern end of Belmore Street, where the impact is listed as 'Low', fails to identify three high-rise buildings of 16+ stories (built between 2020-2026), plus the 10-storey twin-tower Victoria Square and private accommodation, all of which exist with frontage to Belmore Street. There is also a current development application with council for a 15-storey dwelling at 2-8 Belmore Street yet to break ground.

As an extension of Belmore Street, Smith Street travels east/west as the southern border of this development. The Feasibility Study rates the impact on the low density accommodation (terrace houses and some low level high-rise) on the southern side of Smith Street as 'Medium'. These residents will be drastically affected not only by the height of these towers but also Stage 1 of the development which is situated directly across the road with towers of 9+ Levels. Combined, this will all but eliminate an important viewing corridor towards the escarpment.

Running parallel to Smith Street are Victoria Street and Market Street. Both these streets have extensive commercial and residential buildings of height, currently with views to the north-west which will be severely affected by this development. All the locations listed here will be adversely affected with regard to views, sun, shade and wind patterns if this development proceeds as lodged.

3. *Traffic Congestion and Transport Impact.*

The *Flinders Street Precinct Urban Plan* has identified the traffic bottlenecks within this precinct which occur, not only at peak hours in the morning and afternoon but continue throughout the day. The plan has looked at the possibility of reopening an entry corridor at Gipps Street in order to ease the flow, however, with the added traffic, bottlenecks will still continue along Flinders Street at both ends as well as Gipps Street and the Throsby Street roundabout.

#Note: re-opening Gipps Street will only add to the traffic issues by introducing a bottleneck on the western side of the rail at the intersection of Gipps and Foley Street. Foley Street, though only single-lane, is a major arterial corridor leading to the CBD, Wollongong Hospital and the southern suburbs, as well as linking with Memorial Drive for access to the northern suburbs).

Flinders Street, Throsby Street and Foley Street are the major thoroughfares for emergency vehicles (Ambulances, Fire Engines, Police vehicles) to access the northern and western suburbs. With these roads already experiencing heavy traffic much of the day, response times will inevitably suffer.

The Development plan for Keira Square has been designed in isolation from all other developments in existence or planned and is heavily reliant on there being less vehicles in the precinct with more people using public transport due to proximity to the rail link (North Wollongong and Wollongong Stations) as well as bus services running through the main north-south corridor (Flinders Street.) Clearly, the expectation is that, with the added vehicle traffic in the precinct, curb-side parking will diminish with the majority of roads becoming clearways.

Note: The current state of public transport servicing this precinct is currently sub-standard (particularly train links)

However, to suggest that most residents living in these developments will not require access to or desire a vehicle in the medium to long-term and instead will rely on public transport (train & bus, bicycles or walking) is completely unrealistic. Very little provision has been made for extra parking in this area of less than one square kilometre.

The reality is that even if the current developments under construction are the last, there will be an increase of up to 500 more vehicles residing in the area. With the addition of the 2-8 Belmore Street proposed development, the Bunnings site development, the Gallery development (5 buildings), the Brooklyn Square twin-towers, and Stage 2 Keira Place this would result in a potential further increase of more than 2000 vehicles (based on a ratio of one vehicle per 2.5 people.) The proposed number of dedicated parking spots associated with all the developments falls well short of this number.

(Note: As part of the DA lodged relating to parking for this new development Figures have been provided simply do not stack up.

The page 95 reference to parking spaces being calculated at 0.5 of a parking space for a 1 bedroom apartment, 1 space per two bedroom, 1.25 for 3 bedroom Apartments. The D.A has assessed that few of the potential 266 co-living residents will own a vehicle (in lieu of public transport.) None of these statistics are 'worse case') There is little or no consideration from 'through traffic' traversing the precinct and more importantly involved in the delivery of services , including but not limited to 'uber eats' , online shopping deliveries and the like.

The biggest contributor in this shortfall at present is the Keira Place project with a planned 657 units in Stage 2, housing approximately 1200 residents (plus the commercial) but with parking spaces for only 370 cars.

4. *Build and Infrastructure*

As has been identified in the plan, much of the precinct - particularly around Fairy Creek and areas adjacent to the rail corridor - is susceptible to extensive flooding. As concerned residents we feel it is not unreasonable to voice concerns over a 24 and 30-storey tower (of 100+ metres) being built on a known flood impact zone.

It should be noted that the intended 'affordable housing' which is forming part of the Stage 2 development proposal is located in Tower B (25 storeys). As Tower A proposes only 'build to sell' apartments it is not eligible for the 30% height discount.

#Note - Population growth

It has been forecast that Wollongong's population will rise significantly over the next 20 years (2046) with the CBD doubling in size from 9,000 residents (as it currently stands) to 18,000 residents, while the outlying areas of Wollongong will grow by 35%.

With the extensive developments within the Flinders Street Urban Precinct already underway plus existing and proposed builds on both the southern side of Crown Street and upper Crown Street (where height limits are commensurate with the 100 metre ceiling) there is already a projected increase in the population by approximately 5000 in the next 2 years, with substantial developments still on the horizon.

These include, **but are not limited to:**

- WIN precinct
- Cnr Gladstone Avenue and Crown Street
- 357-359 Crown Street
- 13 Crown Street
- Central Park on Keira Street
- Ellen Street Twin Towers

Clearly the projected population and supply of appropriate accommodation, including affordable housing, can be achieved by maintaining a disciplined approach that falls within the existing Flinders Street Urban Precinct planning and height restrictions. Catering for the predicted population can be met without the need to 'fast track' the proposed 24 and 30-storey apartments.

Conclusion

- The proposed height, bulk and scale of the Keira Square Stage 2 is entirely inappropriate for this location. It breaches the core principles of

the Flinders Street framework and inflicts severe impact on the surrounding residences in Smith, Market, Victoria and Belmore Streets in terms of view protection, traffic congestion and environmental concerns.

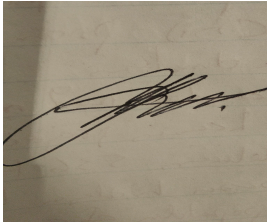
(The Developer has *pre- determined* that the Flinders Street Urban precinct will be littered with large scale high rise, and acknowledges that the proposed development creates a visual dominance in the area by stating that: *'The scale of intended future growth in the precinct establishes a predominant future visual character that is representative of tall buildings within the context of urban renewal in Wollongong. The proposed development is consistent with the intended strategic growth of the city centre and will sit within a future cluster of high-rise development, reducing its overall prominence'*

- The proposed towers are situated on a significantly flood-affected site (formerly a gasworks).
- The development fails to meet the mandated height restrictions of the precinct that have been proposed and signed off by both the Wollongong Council and the NSW Government's Department of Planning, Housing and Infrastructure.
- The added population numbers in the precinct from this development will substantially add to the severe traffic congestion currently experienced.
- While affordable housing has been included in the overall proposal this component is not included in the floor plan for Tower A (30 storeys) therefore should not be eligible for the 30% height discount.
- It is likely the majority of the increased population will originate from Sydney where a move to the Wollongong region is attractive for what is perceived as comparatively cheaper housing and - the primary motivator- the expectation of a far less frantic and congested lifestyle.
- The 'skyscraper' style building precincts that are developing are clearly not within the existing character of the City of Wollongong and, in terms of the Flinders Street Precinct Plan being regarded as the Gateway to the Wollongong CBD, the potential overdevelopment will see the area highly congested, a small but distinct replica of the Sydney CBD skyline and the Gold Coast strip.
- There are a number of other zones within the Wollongong CBD where the height limits being requested by the developer have been approved and could facilitate this proposed amended build.
- It is suggested that noise, dust, increased traffic and other specifics associated with construction will be limited and 'short term' with this development. History shows that 'short term' is reflected in multiple years.

- As a resident group we have no other specific issues with the site being developed however it needs to conform with the already approved ,and implemented Flinders Street Urban precinct as originally lodged and approved

Submitted for your attention and action.

Sincerely

A photograph of a handwritten signature in black ink on a light-colored, textured paper. The signature is cursive and appears to read 'Leigh Forsyth'.

Leigh Forsyth