

Subject: **Formal Holding Submission – Objections to DA SSD-122745741 (Keira Place Stage 2, 120-122 Smith Street, Wollongong)**

Attn: Director – State Significant Assessments

NSW Department of Planning, Housing and Infrastructure

4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150

(Submitted via the NSW Major Projects Planning Portal)

RE: DA SSD-122745741 – Stage 2 Mixed-Use Development, 120-122 Smith Street, Wollongong

Dear Director,

I am writing firstly as a local resident and ratepayer within the Flinders Street precinct but also and importantly as the Secretary of the Strata Body Corporate representing the Residents of 'Eclipse' located at 16-20 Belmore Street in the Wollongong CBD precinct to lodge my/our formal objection to Stage 2 of the Keira Place development at 120-122 Smith Street (DA SSD-122745741).

Given the massive scale of this State Significant Development and the fact that several other huge high-rise projects are being proposed in our immediate neighbourhood at the exact same time, this is a provisional holding submission. Our local community group is currently pooling resources to compile a detailed, multi-project engineering and planning response. I am lodging this now to protect the right to submit that further detailed evidence within the next 30 days.

I strongly request that the Department pause its assessment or extend the exhibition period so that the cumulative impact of all these moving parts can be looked at properly. Our Body Corporate objects to the current plans on the following grounds:

1. Total Lack of Cumulative Traffic Modeling

The traffic report for 120-122 Smith Street looks at this development completely in isolation, which makes no sense for our local road network. It completely ignores the massive compounding traffic that will come from the developer's other huge project—the 38-storey tower proposed just down the road at **4-4A Flinders Street (Wollongong City Motors) as well further developments already underway being 'Brooklyn', 'Gallery' and the old Bunning site..**

Dumping thousands of new residents into this tiny pocket at the same time will cause absolute gridlock. The current traffic assessment fails to show how critical

intersections like Flinders and Gipps Streets, or the Stafford and Station Street bottlenecks, will cope when both of these mega-developments hit the road network at peak hours.

2. Unrealistic Assumptions About Car Ownership (TOD Discounts)

The developer is using the state's Transport Oriented Development (TOD) rules to drastically cut down the number of resident parking spaces on-site, claiming everyone will just use North Wollongong Station. While public transport is important, this completely ignores how people actually live in the Illawarra.

Most residents here still need cars to get to work outside the CBD, drop kids at school, or do their weekly shopping. Forcing a 1,400+ population into an area without enough parking spaces means hundreds of cars will spill over into the surrounding residential streets of North Wollongong, which are already completely maxed out.

3. Traffic Chaos from 266 Co-Living Rooms

The plans include 266 co-living rooms, which function more like short-term studio apartments. Co-living residents generate a massive, constant stream of delivery drivers, couriers, online shopping drops, and rideshares (like Uber and DoorDash).

The applicant's traffic plans do not provide proper, off-street loading zones to handle this type of constant commercial turnover. This is going to lead to delivery drivers constantly blocking lanes, parking across driveways, and idling illegally along Smith Street, creating major safety hazards.

4. Direct Violation of the Wollongong Council Framework

Pushing for a 103.7-metre tower completely destroys Wollongong City Council's newly adopted **Flinders Street Precinct Urban Design Framework (UDF)**. Council put this framework together to keep heights in this gateway area to a reasonable mid-rise limit and to protect the iconic views from the city out to Mount Keira and the Illawarra Escarpment.

If the state government allows Urban Property Group to completely ignore local rules and build a 30-storey building here, it sets a terrible precedent. Every other car yard and warehouse on Flinders Street will use this approval to demand the exact same height, turning our low-rise commercial gateway into a wall of skyscrapers without any of the necessary infrastructure upgrades.

Formal Request

Because the community has not been given a fair opportunity to assess the combined infrastructure impact of all these concurrent developments, I formally request that the Department:

1. **Accept this letter as a formal placeholder submission** to keep my file active.
2. **Decline to make a final decision** on DA SSD-122745741 until a joint traffic and infrastructure study is carried out covering all active proposals within a 500-metre radius of this site.
3. Due to a substandard strategy of public engagement we strongly request the convening of a 'Public Meeting' with both the Wollongong Council and the developers asap.

Yours sincerely,

Leigh Forsyth (for and on behalf of the Eclipse Body Corporate)

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