

Wollongong Developments No. 8 Pty Ltd
C/-NSW Department of Planning, Housing and
Infrastructure
Contact person: Janith De Silva
Locked Bag 5022
PARRAMATTA 2124 NSW

REFERENCE

DE-2025/112

Date

06 November 2025

Dear Sir/Madam

Development	State Significant Development (SSD-76440958) – South House – Mixed Use Development with Infill Affordable Housing (WIN Grand) – Request to Provide Advice on the Environmental Impact Statement (EIS), the Proposal and Recommended Conditions
Location	Lot 4 DP 17979, Lot 5 DP 17979, and 1 more, Lot 1 DP 112417, Lot 100 DP 774957, Lot 9 DP 551157, Lot 8 DP 546125, Lot 1 DP 220513, Lot 2 DP 17979, Lot 3 DP 17979, Lot 1 DP 17979, Lot 7 DP 878243, Lot 1 DP 1135333, Lot 1 DP 183348, Lot 1 DP 226374, and 1 more, Lot 1 DP 82673, Lot 1 DP 117019, Lot 1 DP 302824, Pt Lot 1 DP 927806 Lot 1 DP 1087986 WIN Grand - Burelli, Crown & Kiera Streets WOLLONGONG NSW 2500

Thank you for the opportunity to respond to the proposal. Council firstly acknowledges that the proposal presents a unique opportunity to revitalise a key block in the centre of the city through a coordinated upgrade of the street frontages and introduction of a large number of residents and varied mix of uses that could build on Wollongong strengths. Council will be providing a more comprehensive submission next week.

This initial submission focusses on key matters arising from Council's thorough understanding of the site constraints and opportunities arising from the previous state Regional Planning Panel approved development DA-2021/957 which should inform the detailed design moving forward.

Public Domain

- Under DA-2021/957, extensive work was done to establish the desired footpath levels and widths along with kerb alignments for the perimeter of the block. Those design drawings involved lengthy consultation with relevant stakeholders within Council and Transport for NSW should be maintained under the current proposal as they are essential to achieving necessary pedestrian amenity, incorporate bus stops, taxi zones and the like. The detailed design drawings have been previously provided to the proponent and the sDRP.
- Detailed sections and elevations are required that reflect these design drawings for the full frontage of the development.
- Street trees within the footpath should be retained as the footpaths contain numerous services that would make it challenging to reestablish street trees.

Design excellence

The site is subject to the design excellence provisions under clause 7.18 of Wollongong Local Environmental Plan 2009. Key concerns with the current proposal regarding design excellence are as follows:

- 4(b), 4(e)(x) and 4(e)(xi): the following concerns are raised regarding the public domain:
 - Under DA-2021/957, extensive work was done to establish the desired footpath levels and widths along with kerb alignments for the perimeter of the block. Those design drawings involved lengthy consultation with relevant stakeholders within Council and Transport for NSW should be maintained under the current proposal as they are essential to achieving necessary pedestrian amenity, incorporate bus stops, taxi zones and the like. The detailed design drawings have been previously provided to the proponent and the sDRP.
 - Detailed sections and elevations from kerb to building entries are required that reflect these design drawings for the full frontage of the development.
 - The architectural drawings should include a greater number of visual representations of each building, entry point, public plaza areas, intersections and through links to understand the appearance, amenity and function of those spaces.
 - The northern link between the commercial building and hotel from the plaza to Keira Street is considered unnecessary and to result in CPTED concerns.
 - The large direct flight of stairs from Burelli Street into the plaza is not considered an attractive entry point to the plaza.
 - The Burelli Street frontage is fragmented and dominated by access, servicing and driveways and the purpose of the large setbacks is unclear. There is also limited activation, noting the Grand appears to have no openings directly to the street.
 - Plans for each building façade are too small and lacking in detail.
 - Attention should be given to the curvature of the building alignment in relation to the 'West Crown St Shops' special area to the north (see DCP D13 7.2.1). In this location on Crown St the building alignment should curve in response to the curvature of the road. This curved section of Crown Street runs along a ridge line and was likely a traditional travel route. This more organic form responds more sensitively to the dominant landform and corresponding street alignment. At present the combination of angular building forms, flowing curved steps and the existing road curvature are not well aligned.
 - The internal plaza spaces and through site links are supported. The scale of these spaces in relation to their adjacent uses appears to work well. Further consideration is to be given to improving the level transitions incorporated into these spaces, particular to create a more 'civic' environment which transitions more slowly between levels, rather than relying on long, narrow sets of stairs.
- 4(c): The widening of the tallest tower increases view impacts towards Mt Kembla from Flagstaff Hill. The View Impact Assessment demonstrates what is noted as 'moderate to severe' visual impact to the DCP view from Flagstaff Hill to the Illawarra Escarpment. Council disagrees with the VIA conclusion that 'within the context of the development's height compliance, the proposal can be deemed acceptable, since the highest value components of the view remain, along the Illawarra Escarpment, and distant views to the west are only partially impacted' (pg25). The view to Mt Kembla (Jumbulla) and Mt Keira (Djerra) are considered the highest value components of this view. Uninterrupted views to Mount Keira and Mount Kembla are considered vital due to their cultural and spiritual significance. These landmarks anchor Dreaming stories and traditional education. The Connecting with Country report (Artefact) fails to acknowledge the cultural significance of these view lines, and indeed fails to mention Mt Kembla at all except when citing Council's video 'Dharawal Country – Mt Keira and Mt Kembla'. In this video Aunty Shas notes the importance of views to the mountains as locators.

- 4(d): The plans submitted indicate overshadowing to MacCabe Park between 12-2pm which is contrary to the Sun Plane Protection Map under clause 8.3 of WLEP 2009 and clause 7.18(4)(d). The proposal must not overshadow MacCabe park between 12-2pm mid-winter.
- 4(e)(ii): The Development is in the heart of the Wollongong CBD – a location for major cultural entertainment including live music and 24 hour activity. The proposal is an opportunity to positively contribute to this. The development approved under DA-2021/957 achieved this objective with retention of The Grand as a pub and live music venue, incorporation of a cinema, health facilities and exhibition space. The majority of those components have now been removed from the proposal which is disappointing, noting the hotel is positive addition. It should be demonstrated how the land use mix will contribute to the vitality of the CBD, particularly given the increase in number of residents arising from this development and other similar developments within the CBD.
- 4(e)(iii): The revised tallest tower raises concerns in the degree to which it encroaches above the Marcus Clark building. The design retains a larger portion of the Marcus Clark façade where the development approved under DA-2021/957 retained a smaller more significant portion of that building. This allowed the main tower to hit the ground and have a stronger ground floor and podium presence.
- 4(e)(iv): Council does not support the building separation between building 2.1 and 2.2. ADG minimums should be achieved. Having such minimal separation compromises the amenity of units and results in a form across the site that appears as one consolidated mass and limits views between towers.
- 4(e)(viii): Meaningful sustainability measures must be incorporated into the development. This includes but is not limited to prioritising sustainable transport (bicycle parking, end of trip facilities, pedestrian amenity) applying a Greenstar rating to the development and capturing and reusing water on site. Council has supported for exhibition controls for the City Centre to mandate all electric development. The SEARs Ecologically Sustainable Design (ESD) Report (Eco Engineering Group) does not consider electrification or the transition away from fossil fuel gas. The applicant is encouraged to progress with a fully electric development in order to improve indoor air quality and promote health by reducing exposure to air pollutants; and ensure new development is energy efficient and therefore cost effective for occupants over the long term, and can avoid future costs of electrification or remaining on the fossil fuel gas network.
- 4(e)(xii): The large number of street trees proposed along Crown Street and Keira Street do not appear to have been coordinated with service locations and are likely unrealistic. Street trees within the footpath must be retained as the footpaths contain numerous services that would make it challenging to reestablish street trees.

Heritage

- The site includes the “Former Marcus Clark Building” which is listed as a Heritage Item under the Wollongong LEP 2009. The tower setbacks should ensure the Clock Tower element can be read as the most prominent element in Crown Street. The tower form should not overwhelm the heritage item.
- Detailed and early consideration of the impacts of constructing basement levels and basement parking beneath the Marcus Clark building/façade is required to demonstrate constructability

Waste Management

Given the scale of the development and the number of residential units proposal, effective waste management will have a measurable environmental benefit.

Effective waste management is compromised by the following aspects of the current design:

- A FOGO receptacle must be located on each floor of the residential buildings to facilitate the convenient disposal of food waste
- Tower 1 (38 storeys) does not provide a space on each floor for disposal of recyclable materials or FOGO.
- Each level of the building must provide space for both recycling waste and FOGO to minimise the waste going to landfill (eg 240L bins located adjacent to the general waste chutes).
- It is unclear how/where retail tenancies will dispose of their waste
- The commercial, hotel and retail spaces must have access to FOGO.

Car parking, access and servicing

- Consultation with TfNSW regarding the design detail of the bus stops on Crown and Burelli Streets and the impact of the service vehicle entry on the signalised intersection of Burelli and Kenny Streets will be required.
- DA-2021/957 required the removal of the Atchison Street vehicle slip lane to address footpath transitions and pedestrian safety. This remains a desired outcome for the site, particularly noting the increase density.

Apartment Design Guide (ADG)

- Council notes that an assessment of the development under the ADG will be undertaken by the Department as consent authority.

Other

- Consideration should be given to the likely future subdivision / ownership / management arrangements.
- Council requests that any electronic 3D model of the development that forms part of the documentation is also made available to Council. Council's mapping Services can be contacted for accepted file formats.

Council endorsed documents / policies

Council requests that the following endorsed documents / policies be considered in the assessment

- Urban Design Framework
- Wollongong Retail and Business Centres Strategy 2023
- Wollongong CBD Night Time Economy
- Draft Wollongong City Centre Movement and Place Plan
- Animating Wollongong – Public Art Strategy 2022-2032
- City Centre Public Domain Technical Manual

If you have any questions regarding the above, please contact me on the telephone number below.

This letter is authorised by

Nigel Lamb

Senior Development Project Officer
Wollongong City Council
Telephone (02) 4227 7111