

6TH November, 2025

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To The Minister,
Department of Planning, Housing and Infrastructure.

SSDA APPLICATION – SSD-76440958

221-291 Crown Street, 216-238 Keira Street and 86-90 Burelli Street, Wollongong

Dear Minister,

Thank you for the opportunity to make a submission in relation to the SSDA Application for the proposed development.

We wish to advise that we do not support the current design of the proposed development.

We declare we have not made any reportable political donations on the last 2 years.

We acknowledge that we accept the departments disclaimer and declaration and our submission does not contain any offensive, threatening, defamatory or inappropriate content.

We are residents (owners) in the Avante mixed use building located at 3 Rawson Street, Wollongong (diagonly across from the subject site to the west) and would like to submit the following comments in relation to the proposed development.

A couple of years ago we went through the approval process with Wollongong City Council in relation to the approved Development Application DA-2021/957 which resulted in a well designed development being approved which was sympathetic with the local area in relation to the Height of buildings, location of buildings, number of buildings, facilities and amenities for the public and the architectural appearance of each building on the site.

I identified the final proposal as the “Jewel in the Crown “ (Jewel in Crown Street) setting the benchmark for building design and public amenities for future development within this great city.

Regretably this will all be lost if the proposed development as submitted is approved.

In my opinion the proposed development is excessive to the extreme in many ways and would not be in the public interest if approved and is considered gross over development.

Table below identifies the difference between approved DA and proposed development.

Element	Approved DA-2021 / 957	Proposed
Number of buildings and height of each building.	Total = 7 consisting of: Tower 1 – 39 storeys ----- Tower 2 – 23 storeys ----- Tower 3 – 17 storeys ----- Health & Wellness building – 4 storeys --- Commercial building – 7 storeys ----- Grand hotel – 4 storeys ----- Pool and gym building – 4 storeys -----	Total = 7 consisting of: Building 1 – 38 storeys (less 1 storey) Building 2.2 – 24 storeys (actually 26 storey from Burelli Street) (increase of 3 storeys) Building 2.3 – 17 storeys (actually 19 storey from Burelli Street) (increase of 2 storeys) Building 2.1 – 16 storeys (New multi storey building) (increase of 12 storeys) Commercial building – 13 storeys (increase of 6 storeys) Hotel – 10 storeys (increase of 6 storeys) Building 3 – 16 storeys (New multi storey building therefore increase of 16 storeys) TOTAL NUMBER OF NEW STOREYS ON THE SITE = 45 STOREYS
Number of Apartments	390 apartments in 3 buildings	546 apartments in 5 buildings (increase of 156 units)

Car spaces	496	774 (increase of 278 vehicles)
Retail tenancies	60 tenancies	21 tenancies (loss of 39 retail tenancies)
Basement levels	3	2 (loss of 1 basement level)

The Affordable housing should be limited to a single building on the site which would be in keeping with the intent of the affordable housing policy for a building site.

Currently there are 3 buildings containing affordable housing: Building 2.2 has 13 units
Building 2.3 has 16 units
Building 3 has 103 units

We fully support affordable housing however in this instance we believe the developer is taking advantage of and abusing the system which results in over development of what was a great development under the previously approved Development Application.

Unfortunately we believe the appearance of the buildings in particular Building 2.1, 2.3, 2.3, 3 and the commercial building look like office buildings built in the 80's and not modern buildings in 2025.

The buildings identified above have little to no architectural features, no design features and in my opinion should be subject to a "DESIGN COMPETITION " similar to that undertaken by Sydney City Council for major developments to ensure the best design for the site is achieved.

The Visual Impact Assessment prepared by "urbaine design group" has based their assessment on the view impact from the balcony of a single unit in only one building in close proximity of the subject site.

There are 3 major high rise residential buildings in close proximity to the proposed development and there appears to be no assessment on the effect of the proposed development from any other location than level 18 of the Avante building located at 3 Rawson Street.

Level 18 is currently possibly the highest point in this area and I note the following from page 27 of the subject report in relation to Visual Impact and Tenacity Assessment:

Visual Impact Assessment: (page 27 of report)

*The view impact would result in a **significant lateral view loss, to the southeast**, as a result of the new proposals **height and scale**.*

*Upon completion the **proposal would impact upon the greater part of coastal views**, as well as the residential views in the immediate surrounding area.*

***Sky and horizon views** would be bisected by the structure, **impacting many of the views from the Rawson residential flat building**.*

*The **visual impact extent** from this location can thus be assessed as **Severe-to-Devastating**, taking into account the amount of **view loss and the quality of views obscured**.*

Question: If this is the impact from one unit at the highest point in the area what is the impact from all residential units below level 18 just in the "Avante" building let alone the adjoining "Signature" and "Sky" residential buildings.

Avante Building – 75 apartments
Signature Building – 150 apartments
Sky Building – 105 apartments

Tenacity Assessment Summary: (page 27 of report)

- **Value of view: High**
- **View location: Private upper storey balcony – level 18** (possibly level 19 being the upper storey of 2 storey penthouse)
- **Extent of impact: Severe-to-Devastating**

Question: How is it acceptable to approve the proposed development in its current form of “Height and Scale” which will have “ Severe-to-Devastating consequences as stated in the report.

In addition to the above the report states that the views of “**High Value**” are for the most part, retained, particularly to the illawarra escarpment to the west.

There is little to no commentary on the “Views of High Value” facing east which will now be obstructed other than 1 residential unit as noted.

We wish to advise that we have no objection to development (Peter being in the Building Industry) and **we were actually looking forward** to construction commencing in relation to the **original DA – 2021 /957**, however this has drastically changed with the proposed development not only due to the bulk and scale of the buildings but the architecture is terrible and must be re-designed.

As previously discussed this site is possibly the most important site in Wollongong and it cannot be taken lightly.

Approval in its current form cannot happen and it is requested that the Department of Planning, Housing and Infrastructure give careful consideration to the proposal and the long term detrimental impact such a development will have on the City of Wollongong due to the bulk and scale and over development of one of the most important sites in the CBD of Wollongong.

I am happy to discuss further and / or be included in any discussions in relation to this proposed development and we thank you for your time in relation to the subject matter.

Regards

Peter and Pamela Dix