



Australia's property industry

Creating for Generations

Property Council of Australia
ABN 13 00847 4422

Level 1, 11 Barrack Street
Sydney NSW 2000

T. +61 2 9033 1900
E. nsw@propertycouncil.com.au

propertycouncil.com.au
 [@propertycouncil](https://twitter.com/propertycouncil)

29 April 2020

Mr Greg Doyle
General Manager
Wollongong City Council
Locked Bag 8821
Wollongong NSW 2500

Email engagement@wollongong.nsw.gov.au

Dear Mr Doyle

Wollongong City Centre Review – Urban Planning Framework

The Property Council of Australia welcomes the opportunity to provide comments on the Wollongong City Centre Urban Design Framework. We acknowledge our collaborative working relationship with Wollongong City Council and will continue to engage with Council on this matter to address the recommendations raised by your review.

As Australia's peak representative of the property and construction industry, the Property Council's members include investors, owners, managers and developers of property across all asset classes. We also represent a diverse group of members spread across all parts of the Illawarra and Shoalhaven region.

The revitalisation and reshaping of the Wollongong CBD to achieve its potential and the 'City for People' vision is a key priority for the Property Council in the Illawarra, and we acknowledge the work that Wollongong City Council has undertaken to recognise some of the current and future challenges in our CBD.

Overall, we agree in principle with the themes and the broad purpose of the framework, its vision and objectives, with further recommendations in line with each of these principles provided by the Property Council Illawarra in the table further below.

We ask that you continue to collaborate with industry as this will enable to not only bring the industry along the journey with you, but also assist in assessing the viability of further decisions and changes with a vast amount of local knowledge, experience and expertise available to assist in achieving the objectives of this framework.

Our Committee is committed to collaborating with Council on the implementation of this document and further changes that need to be made to achieve the objectives of this document. We thank you for the opportunity to provide feedback and input into this process and look forward to continuing working with you on this very important piece of work.

PROSPERITY | JOBS | STRONG COMMUNITIES

Should you have any questions, please do not hesitate to contact myself on 0437 315 198 or Troy Loveday, Senior Policy Advisor on (02) 9033 1907.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M Guido', with a stylized flourish at the end.

Michelle Guido
Illawarra Regional Director
Property Council of Australia

Recommended Actions	Property Council Response
<p><u>Urban Design Framework:</u></p> <p>Direction 1 – Prioritise jobs growth and establish a resilient commercial core</p> <p>Strategy 1.1 – Define and strengthen the role of the B3 Commercial Core for employment</p> <p>Strategy 1.2 – Investigate incentives for commercial development</p>	<p>Agree in principle – with recommendations.</p> <p>We agree that commercial core protection is important, however we have some concerns with the areas marked as commercial only and making the whole of Burelli Street commercial only. The commercial core precinct should be within the areas surrounded by Kembla Street to Keira Street and Market Street to Burelli Street. There is also further potential for redevelopment of Western Crown Street with close proximity to retail and service amenities, as well as good transport connections.</p> <p>The lower part of Burelli Street from the Council Building up to McCabe Park would be a good area to keep commercial only, this is already happening organically, however the other parts of Burelli Street up towards the train station being more problematic for the industry. We are unsure there will be the demand for commercial only for the whole length of Burelli Street and IF the demand will be there for A-Grade office as suggested, especially in light of the recent COVID-19 crisis. It would be more beneficial focusing on the areas as specified above for this precinct.</p> <p>There is a further opportunity for further commercial development in the lower part of Crown Street Mall, and a real potential here to encourage mixed use development and amenities such as outdoor dining, increasing foot traffic during the day and night. There are some restrictions to the sites in this area, however working to consolidate these sites and working with developers with a clear direction on to the vision for the precinct will be critical. There is also potential to utilise this area for smaller, boutique commercial offerings for commercial businesses as well as A-Grade office, which is already evident and happening organically in this part of the mall. We encourage you to focus on repurposing this area as a core commercial and mixed-use precinct, this is truly an area of the commercial core that can support the CBD’s growth and further work here needs to be done to create this vision.</p>
<p><u>Urban Design Framework:</u></p> <p>Direction 2 - Define a thriving retail network that responds to character supports a range of others</p>	<p>Agree in principle – with recommendations.</p> <p>We agree with the move to only require non-residential ground floors on key retail streets, and not the whole CBD as is currently in place. This doesn’t work and has pushed retail out of the core CBD, and businesses to spread out across the CBD making our CBD core essentially ‘too big.’</p>

<p>Strategy 2.1 – Protect the character and role of key retail streets and precincts</p> <p>Strategy 2.2 - Only require non-residential ground floors on key retail streets</p> <p>Strategy 2.3 – Develop planning controls that support a balance between night-time economy and residential city living.</p>	<p>As we have previously discussed with Council, the current retail precinct is problematic and too long in length to be able to sustain and activate. Retailers are gradually moving up to the upper end of the precinct and vacancies are increasing by the day in the lower part of the mall. This is a real issue and the acknowledgement of this by Council is vital to reshaping the lower end of mall and encouraging more commercial office and mixed-use developments in this area. Also considering the current COVID-19 crisis, this is even more critical with the retail sector taking a hit and businesses impacted.</p> <p>The retail core should focus on the areas between Keira and Church Streets, and the east of Church Street should be reopened to slow moving traffic with the ability to be closed for special events etc. One of the main issues in the lower end of the mall is activation and no traffic flow, there is an opportunity here to explore opening a one way traffic flow in this area just up to Church Street (before H&M and old David Jones Site) to invite more people in while still maintaining the character of the precinct. There is already momentum from building owners in this area, and we believe that a restricted traffic flow in this area will be beneficial for businesses, developments and people who in live in the city.</p> <p>The night time economy is also lacking in this area, and as mentioned above we have a real opportunity to make the lower end of the mall into a more vibrant, inviting space which allows eateries, cafes and bars open up to the street and create a great a place that people want to visit and spend time in. Especially in light of tourism, there is a real opportunity to reshape this part of Crown Street to make it more inviting.</p> <p>At the moment, the upper end of the retail precinct seems to be working well with consistent traffic flow and pedestrian flow into the centre, however this is not the same for the lower parts of the mall. Another opportunity for this lower end of the mall is to encourage Education institutions to come into the commercial core, this would not only activate this area with a diverse range of people but also encourage more people to visit the CBD, spend time there and support surrounding businesses and retail. We note that this is also an action in Wollongong City Council's Economic Development Strategy.</p> <p>The other area in need of redevelopment as mentioned above is Western Crown Street, this is an area which should be supporting the health and medical precinct and with close proximity to transport and retail/services there is ample opportunity in this area to create a move vibrant, inviting and diverse place. Though it is happening organically, there should be a clearer direction for this precinct.</p>
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<p><u>Housing</u></p> <p>Direction 3 - Plan for a variety of housing to support a lively and inclusive City</p> <p>Strategy 3.1 – Guide residential development in the right locations</p> <p>Strategy 3.2 – Leverage opportunities for public benefit improvements through development</p> <p>Strategy 3.3 – Encourage a diversity of housing including Affordable Rental Housing and Student Housing</p>	<p>Agree in principle.</p> <p>We agree that increasing the City’s residential population will bring significant benefits to the CBD and help to activate specific areas and support local businesses. It is important that we do have the right types of residential development in the right locations and more importantly, a diverse range of housing available to citizens.</p> <p>We should be encouraging more students to live in the city with a focus on smaller, more affordable product for students, but this needs to be backed up by good data to ensure that the demand is there and what we classify as ‘student accommodation.’ It would be worth doing some more research on what students want, what the trends are, and co-living properties or more flexible housing are also potential opportunities.</p> <p>There is also a growing trend in alternative use for residential use for short-term rental accommodation and serviced apartments. Considering the challenges already being experiencing regarding hotel availability, it would be worth looking into this in more detail to understand what the demand is and consider the challenges already in place regarding hotel infrastructure.</p> <p>We note the release of a Draft Housing and Affordable Housing Options Paper by Council this week and will look to provide a more detailed submission on housing in response to this paper.</p>
<p><u>Built Form:</u></p> <p>Direction 4 - Grow a legible city that supports a distinctive and evolving character.</p> <p>Strategy 4.1 – Plan for diversity in form and renewal at all scales.</p> <p>Strategy 4.1 – Plan for building envelopes that preserve and support the desired future character.</p>	<p>Agree in principle – with recommendations.</p> <p>Overall, we support this principle and the need for more streamlined planning controls, and more work needs to be done in this space to elevate the importance of design and the built form should reflect the vision for the precinct and not just a ‘one size fits all’ approach. However, at the same time we don’t want to overcomplicate the process with complex planning controls - the missing piece in this framework is <i>How</i> we do this and what the Council is planning to do to work with the wider industry in an effective and efficient way to achieve this objective <i>together</i>.</p> <p>There are a few issues to raise:</p>

<p>Strategy 4.3 – Preserve buildings and places of significant character values for the enjoyment of future generations.</p> <p>Strategy 4.4 – Preserve views to the escarpment, ocean, natural and built heritage.</p> <p>Direction 5 - Strengthen and simplify planning controls to promote built form diversity in response to people and place.</p> <p>Strategy 5.1 – Develop controls that ensure slender tower forms, appropriate separation and consistent setbacks.</p> <p>Strategy 5.2 – Develop controls for floor to ceiling heights that ensure good amenity and adaptability.</p> <p>Strategy 5.3 – Develop controls that provide guidance on site amalgamation and isolation.</p> <p>Strategy 5.4 – Develop controls for fine grain frontages to ensure human-scale development.</p> <p>Direction 6 - Elevate the importance of design quality in the City Centre.</p> <p>Strategy 6.1 – Strengthen the commitment to design excellence.</p> <p>Strategy 6.2 – Encourage innovation and design quality in the local design and development industry.</p>	<ul style="list-style-type: none"> - There is a current disconnect between what the current planning controls deliver and the vision for the City. Further work needs to be done to determine the changes required to the planning controls to deliver the outcomes of the Urban Design Framework to achieve a ‘City for People.’ - This document or next phase of this work to be undertaken should spell out the heights and FSR and building forms desired for each precinct, otherwise there is a risk that the LEP or DCP will only ‘tinker’ around the edges of the current planning controls. - Each precinct needs to have its own unique set of planning controls directly linked to the land use and built form the City Centre Plan envisages in that area. This will be a major departure from how planning controls have been used in the last 15 years and certainly since the NSW Govt introduced the one LEP Template (one size fits all approach) enforced in 2009. <p>We acknowledge council’s recognition of strengthening design excellence and ensuring a stronger design culture across council and the community. We encourage Council to explore this further as part of this framework and collaborate with industry to achieve this vision and shape precincts in line with design guidelines. This is something which should be explored in the near future to test the viability of decisions.</p> <p>We also encourage Council to implement the Major Projects Panel as described in their Economic Strategy to assist in achieving the vision for the city. A dedicated team with an urban designer which is leading the transition to achieve the true vision of the city and this strategy would be recommended.</p>
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<p>Strategy 6.3 – Provide clarity and improve outcomes through a strong assessment process.</p> <p>Strategy 6.4 – Prepare design guidelines that communicate better design outcomes.</p> <p>Strategy 6.5 – Develop specific design guidelines that demonstrate better built form outcomes on flood prone lands.</p>	
<p><u>Public Domain and Connections:</u></p> <p>Direction 7 - Strengthen the structure of the City through a permeable grid that prioritises pedestrians</p> <p>Strategy 7.1 – Define the role and function of streets in the City.</p> <p>Strategy 7.2 – Create a permeable city grid for pedestrians</p> <p>Strategy 7.3 – Deliver active transport infrastructure.</p> <p>Strategy 7.4 – Enable the mode shift from cars to public transport.</p> <p>Strategy 7.5 – Identify roads for vehicular traffic and servicing.</p>	<p>Agree in principle – with recommendations.</p> <p>We support the principles raised in the framework, however, would like to see more emphasis on activation and creation of ‘great places’, where people have a sense of place with good amenity.</p> <p>Stronger suggestions on how to improve, enhance our public places is key and revisit previous reports conducted such as the Public Space/Public Life document.</p> <p>It would be beneficial to also focus efforts on improvements to Crown Street, the lower end of the Mall, Marine Drive and the entertainment precinct.</p> <p>We support the revisiting of access and movement around the city and it is also encouraged to do further analysis on public transport, parking and pedestrian activity and priority (as well as car parking) before implementing further changes to the ‘grid’ around the city.</p> <p>We support the need for open spaces and a ‘green’ city that is welcoming to citizens and people working in the CBD to enjoy and spend time in and there is a real opportunity with McCabe Park in which we would like to see Council explore further.</p>

Direction 8 - Create a green network of open spaces for a sustainable, healthy and attractive city

Strategy 8.1 – Reinforce the character of key streets and precincts with appropriate tree planning.

Strategy 8.2 – Define and implement a 35% minimum canopy target on key walking streets by 2037.

Strategy 8.3 – Prepare a City Centre Street Tree Masterplan.

Strategy 8.4 – Establish a tree-centric approach to deliver greening in response to existing constraints.

Strategy 8.5 – Leverage new development to offset the cost of greening.

Strategy 8.6 – Identify and prioritise public domain projects to catalyse renewal and encourage investment in the city.

Direction 9 - Protect sunlight to key public spaces

Strategy 9.1 – Protect solar access to key public spaces to maximise amenity.