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Thomas Soccio  
Manager, Local and Regional Planning - Southern Region  
Department of Planning, Housing and Infrastructure  
84 Crown Street  
Wollongong NSW 2520

Via email: [thomas.soccio@dpie.nsw.gov.au](mailto:thomas.soccio@dpie.nsw.gov.au)

Dear Mr Soccio,

The Property Council of Australia is Australia's peak representative of the property and construction industry with over 2,300 member companies. We are the voice of the Australian property industry, championing a strong, thriving sector that leaves a positive legacy for all Australians. We principally support "Great cities, Strong economies and Sustainable communities".

Our Illawarra Chapter and Future Directions Committee members operate across the Illawarra with members from the design, planning, engineering, and legal professions as well as owners and operators of key industrial, commercial, and residential companies. Through our work, we are acutely aware of the challenges facing government on the need to balance growth for a changing and diverse population but still provide services and lifestyle benefits offered within a regional area.

We support the review of the Wollongong Health Precinct (WHP) by the NSW Department of Planning and Environment (DPHI) which primarily covers the Wollongong Public Hospital and Wollongong Private hospital, smaller health operators, surrounding residential areas, commercial premises, and state and local roads and local open space.

We support the work undertaken by DPHI as part of the *Shaping the Wollongong Health Precinct Strategy* report (December 2023) which was prepared in response to a key recommendation in the *Illawarra Shoalhaven Regional Plan 2041*. The review should be used to amend, where required, the *Wollongong Local Environmental Plan 2009* (WLEP 2009), which is the principal environmental planning instrument that applies to the WHP.

This review should facilitate the future expansion of the primary medical facilities in an orderly and integrated manner without significant impact to the urban fabric and amenity of the surrounding locality. There should also be an opportunity to improve safety and amenity through public domain improvements that foster a stronger sense of place and better connectivity to key nodes including the Wollongong CBD and Wollongong Station Interchange.

## Recommendations

We offer the following four primary recommendations and supporting commentary to DPHI which should be addressed as part of any new planning framework for the WHP. Further commentary on key questions in the *Shaping the Wollongong Health Precinct Strategy*, are provided in **Attachment No.1**.

### **1. That DPHI prepares a precinct master plan to guide the long-term planning and redevelopment of the precinct.**

The precinct is complex with a strong land use mix, a pastiche of building uses and types with a disjointed road network punctuated by pockets of open space. With up to six different land zonings in the precinct ranging from mixed uses, residential, commercial, infrastructure and public open space, there is a real uniqueness to this area.

The precinct has a long history, which was established well before European settlement. Now centred on the Wollongong Hospital, which opened in 1907, there is now long standing and entrenched interests in the area. This includes an older style and compact residential area, long standing commercial premises along Crown Street / Princes Highway and the rail line which acts as a strong eastern boundary. The precinct also has a unique geography due to its elevation which allows expansive views to the Tasman Sea and to the Illawarra escarpment.

The strong history embedded in the precinct and its unique natural geography provide both challenges and opportunities to undertake the transformation of this area which still allows the WHP to continue to provide superior health services to Wollongong and Illawarra Region.

The Property Council contends that a master plan should be prepared for the WHP that seeks to properly understand the nature of the precinct through feasible and reasonable design solutions that achieve the following outcomes:

- A strong sense of place built upon a high-quality public domain and good access to existing and new open spaces
- Ease of movement for all demographics and abilities that achieve good legibility and connection to key nodes including the Wollongong CBD and Wollongong Station Interchange
- Planning based on indigenous principles, meaning and interpretation that present a history prior to European settlement
- The recognition of the strong viewlines to key natural features and urban landmarks
- Clear design interfaces between hospital uses and residential areas to minimise land use conflicts and achieve cohesiveness where possible
- A vehicle, cyclist and pedestrian access hierarchy that improves movement and accessibility for all road uses but importantly it maintains Urunga Parade as a primary access point for the Wollongong Private Hospital
- Recommendations based on a short-, medium- and long-term timeframe that give a clear indication to the community and stakeholders to how the precinct will transform through planned upgrades and a scheduled program of public and private works
- A proposed list of planning amendments to the WLEP 2009 that facilitate the precinct plan's outcomes. Suggested amendment could include changes to height of buildings, and floor space ratio.

### **2. That the NSW Government provides key worker housing in the WHP to further lessen the housing affordability and rental crisis which is gripping the Illawarra.**

The Illawarra is facing a housing and affordability crisis which is forcing people to live further away from their place of work and leading to staff shortages across a range of industries.

Based on Core Logic data, *“Typical house prices soared **16 per cent** over the past year and unit prices went up 14 per cent (in Wollongong), eclipsing the 13 per cent jump in average Sydney values.... The median price of a Wollongong house is now about \$720,000, while the median unit price is about \$520,000”.*

To compound this rapid rise in house and unit prices, The *Solutions to the affordable housing crisis in the Illawarra Shoalhaven Advocacy Report* (Business Illawarra, July 2023), identified that the lack of key worker housing is particularly acute in the Illawarra Shoalhaven region, where key workers face income-to-rent ratios of 40 percent compared against the national average of 30 percent. Within the Advocacy report, *Judith Stubbs and Associates* identified that the housing shortfall in the Illawarra Shoalhaven will rise to 11,645 dwellings by 2041 if nothing is done. As such, the Advocacy report recommends that key worker housing should be included within all major, state government-led employment generating projects like hospitals.

The review of the WHP, provides an opportunity to provide for affordable housing (key worker housing) from the onset in the immediate area. This will allow an opportunity for lower skilled workers and key skilled workers, of which many work at hospitals, to live close to where they live, with the added benefit of less incidences of staff shortfalls which directly impact hospital operations. Key worker housing could include traditional nurses' quarters or separately managed dwellings for key hospital workers.

We cannot have a situation where a major health infrastructure investment occurs in the WHP with result being that there are no staff to ensure their operations run efficiently. A situation that will undermine the ability of the WHP to continue to provide superior health services for a changing and growing Illawarra Shoalhaven population.

### **3. That Wollongong Hospital and Wollongong Private Hospital work together to provide a shared car parking facility off Urunga Parade, which also contains a pedestrian overpass at Urunga Parade that links both hospitals.**

We are aware that redevelopment of the Wollongong Public Hospital, is planned to occur based on a new NSW Health Clinical Services Plan. The operators of the Wollongong Private Hospital are also proposing an expansion to respond to increasing but also changing health needs. This project alignment provides an opportunity to lessen project cost and minimise traffic and parking woes that typically plague residential areas located near hospitals.

The Property Council supports an option to share the existing car park at Dudley Street and Urunga Parade. A redevelopment of this car park site that sees new hospital services being located on top of a new underground car park, that is linked by a new overpass at Urunga Parade could allow a sharing arrangement of carparking for each hospital. This will lead to less project cost with building and/or upgrading new car parks. It will also reinforce the status of the WHP and lead to greater integration and connectedness of the two major health providers. This added benefit should see a more manageable parking arrangement and less risk of parking incursions and traffic impacts in nearby residential areas.

Only through a master planning process (Refer to Recommendation No.1) could such a project benefit be achieved that carefully manages the development process and ultimately allows for the integration of health users who typically have a high demand for parking.

### **4. That a governance framework is established between the main stakeholders to oversee the transformation of the WHP**

The precinct is likely to see major transformative change in key areas of the WHP which could occur over a 10-year period. This could concern some stakeholders who may not support the master plan outcomes (refer recommendation no.1). Further, with entrenched property interests and investment in the WHP, which are not health related, it could again lead to conflict and overall failure to achieve the transformation and expansion of health services.

It is therefore imperative that a proper governance model is established early in the master planning process that involves key stakeholders and properly manages the associated impacts of transformative change.

A core group of representatives from NSW Health, DPHI, Transport for NSW and Wollongong City Council are critical in shaping the public domain vision, providing the planning framework, and ultimately funding the upgrade of public utilities and areas. Additional to this is Wollongong Private Hospital and the various smaller health providers, non-health operators and the surrounding local community which should be actively engaged and involved closely.

Good governance can lead to better stakeholder engagement and less community friction when development proposals are publicly exhibited. It will lead to less misinformation and a negative community reaction on how the precinct will be transformed.

With the key representatives involved it could better target highest-priority upgrades to local infrastructure, ensure a value-for-money outcome for both State and local government investment and lead to the highest possible community benefit.

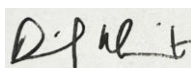
## **Conclusion**

The review of the Wollongong Health Precinct provides a great opportunity to deliver a precinct master plan based on good governance that allow for the orderly transformation of the area without any major environmental and/or community impact. A sharing of public utilities between the major hospitals and provision of key worker housing will reinforce the WHP as a provider of superior health services to a changing and growing population in the Illawarra Shoalhaven.

We are further willing to continue to work with DPHI on the delivery of key planning provisions that support the redevelopment of the Wollongong Health Precinct to further emerge as a world-class health precinct servicing the Illawarra Shoalhaven region.

If you have any questions related to the matters raised in this letter, I can be contacted on 0415 914 612 or at [dwhite@propertycouncil.com.au](mailto:dwhite@propertycouncil.com.au)

Yours sincerely,



## **David White**

Regional Director - Illawarra  
Property Council of Australia