



Wollongong City Centre Urban Design Framework & Economic Analysis

UDIA NSW Response

April 2020

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ABOUT THE UDIA

Established in 1963, the Urban Development Institute of Australia (UDIA) is the leading industry group representing the property development sector. Our 500 member companies include developers, engineers, consultants, local government, and utilities. Our advocacy is focussed on developing liveable, affordable and connected cities.

EXECUTIVE SUMMARY

The Urban Development Institute of Australia – NSW (UDIA) welcomes the opportunity to make a submission on the draft Wollongong City Centre Urban Design Framework (the Framework). We are proud to have Wollongong City Council (Council) as a UDIA member, and we have a collaborative working relationship with Council. UDIA's Illawarra Committee includes many of the major developers and allied professionals active in the Wollongong City Centre. We bring a high level of industry knowledge and experience to our submission.

We are very pleased to see Council identifying the key issues currently constraining the city centre, and proposing reform to address these issues. We are supportive of the proposals to strengthen the retail core, improve permeability, green the city and protect solar access.

Our primary concerns with the Framework are:

- The proposed commercial-only precincts and the impact on development feasibility and renewal in these areas of the city centre.
- The proposed reductions in floor space ratio and/or height of buildings in various precincts of the city based on subjective 'place' criteria.
- The proposed leveraging of development to fund public domain improvements and affordable housing supply without additional uplift to support development feasibility.
- The proposed expansion of the Design Review Panel process, the expansion of key sites, and the application of a design excellence competition to these key sites, which will add unnecessary complexity, delay and expense to renewing the city centre.

UDIA believes many of the issues affecting the city centre do not require wholesale change to the flexible planning controls currently in place, and that the design quality and amenity of the city centre can be lifted through strengthening council processes and providing certainty to the industry. In summary, UDIA provides the following recommendations:

- Recommendation 1: Council should not introduce a commercial-only zone which prohibits residential development, or place additional development control restrictions on residential development, in the areas it wants to encourage commercial development.
- Recommendation 2: Council should provide additional incentives for commercial development (in addition to the existing floor space ratio incentives) in the areas it wants to encourage commercial development.
- Recommendation 3: Council should (as proposed) remove the ground floor retail requirement outside of the retail core.
- Recommendation 4: Council should not impose additional developer charges or seek an increase in s7.12 charges to facilitate public domain improvements.
- Recommendation 5: Council should not impose additional requirements for housing mix or apartment sizes.

- Recommendation 6: Council should not impose additional requirements for affordable rental housing or student housing without providing adequate additional uplift to ensure development feasibility.
- Recommendation 7: Council should retain the existing height controls in the City Centre.
- Recommendation 8: Council should not reduce floor space ratios in the City Centre.
- Recommendation 9: Council should not apply the arbitrary protection of views from Flagstaff Hill to the escarpment, and should allow key sites to pierce the view-line to highlight the importance of the city centre.
- Recommendation 10: Council should strengthen its existing design quality processes and staff expertise, and not apply additional design review processes or design excellence competitions.
- Recommendation 11: Council should address the following additional issues in the final Framework:
- a City Centre Gateway Strategy;
 - the Coniston-Wollongong-North Wollongong commuter corridor;
 - and a strategy for optimising existing council carparks in the city centre.

Our response to each of the strategies in the Framework is summarised in the table below.

<u>Direction/Strategy</u>	<u>UDIA Response</u>
Direction 1: Prioritise jobs growth and establish a resilient commercial core.	
Strategy 1.1: Define and strengthen the role of the B3 Commercial Core for employment.	Oppose
Strategy 1.2: Investigate incentives for commercial development.	Support – with additional incentives needed.
Direction 2: Define a thriving retail network that responds to character and supports a range of offers.	
Strategy 2.1: Protect the character and role of key retail streets and precincts.	Neutral – Retail must be ground floor. Allow mix of commercial and residential at higher floors.
Strategy 2.2: Only require non-residential ground floors on key retail streets.	Support
Strategy 2.3: Develop planning controls that support a balance between night-time economy and residential city living.	Support – adopt Melbourne model of new residents accepting pre-existing noisy uses.
Direction 3: Plan for a variety of housing to support a lively and inclusive City.	
Strategy 3.1: Guide residential development in the right locations.	Neutral – Support ground floor residential and a variety of dwelling sizes, but not a mandated dwelling mix within developments. Future SEPP 70 requirements may also affect dwelling mix and development feasibility.
Strategy 3.2: Leverage opportunities for public benefit improvements through development.	Oppose – existing s7.12 arrangements are adequate if well managed and planned by Council. We oppose any additional taxes or charges for public improvements without zoning uplift.
Strategy 3.3: Encourage a diversity of housing including Affordable Rental Housing and Student Housing.	Oppose – existing incentives for affordable housing are adequate. We oppose additional levies without zoning uplift.
Direction 4: Grow a legible city that supports a distinctive and evolving character.	
Strategy 4.1: Plan for diversity in form and renewal at all scales.	
<ul style="list-style-type: none"> Map maximum FSR controls across the City Centre that respond to 'place'. 	Oppose – in a dense city centre, built form should be guided by height rather than FSR.
<ul style="list-style-type: none"> Protect and incentivise commercial capacity. 	Support (without residential prohibition)

<ul style="list-style-type: none"> • Unlock development potential on narrow sites to allow renewal when high quality design outcomes can be demonstrated. 	Support – but concerned about the discretionary approach to additional FSR/height. This creates investment uncertainty.
Strategy 4.2: Plan for building envelopes that preserve amenity and support the desired future character.	
<ul style="list-style-type: none"> • Protect the amenity of key public places. 	Support
<ul style="list-style-type: none"> • Limit residential capacity in flood prone areas. 	Limited support – but this should be achieved through specifically maintaining existing residential FSR, not reducing building heights, as non-residential ground floor uses may still be proposed.
<ul style="list-style-type: none"> • Create a legible city skyline that concentrates height around the office core. 	Limited support – skyline should be legible but not focussed on office-only height eminence.
<ul style="list-style-type: none"> • Ensure heights reflect character of precincts. 	Limited support – we do not support downzoning of existing controls in the Market Street commercial precinct based on smaller existing offices.
<ul style="list-style-type: none"> • Align heights to development potential. 	Oppose – Height controls should be maintained to ensure a legible skyline and potential yield should not be downgraded simply because of existing lot sizes (with no amalgamation) or perceptions about development potential.
Strategy 4.3: Preserve buildings and places of significant character values for the enjoyment of future generations.	
Strategy 4.4: Preserve views to the escarpment, ocean, natural and built heritage.	
<ul style="list-style-type: none"> • Ensure the form of development in the city centre preserves views to the escarpment from the foreshore. 	Oppose. Why are continuous views of the escarpment from Flagstaff Hill so vital? Having some towers pierce the escarpment line signals the strength of the City. Tower slenderness controls in Strategy 5.1 would help reduce their impact.
<ul style="list-style-type: none"> • Preserve views along street corridors. 	Support.
<ul style="list-style-type: none"> • Ensure built form controls create a permeable skyline. 	Limited support.
<ul style="list-style-type: none"> • Improve views to St Michael's spire and Courthouse. 	Support.

Direction 5: Strengthen and simplify planning controls to promote built form diversity in response to people and place.

Strategy 5.1: Develop controls that ensure slender tower forms, appropriate separation and consistent setbacks.	
<ul style="list-style-type: none"> Achieve an attractive city skyline sympathetic to the topography, natural setting and character. 	Support.
<ul style="list-style-type: none"> Promote tower slenderness. 	Limited support – concern about reduction in residential GFA without uplift.
<ul style="list-style-type: none"> Attractive and diverse tower forms. 	Support.
<ul style="list-style-type: none"> Ensure well separated towers. 	Support.
Strategy 5.2: Develop controls for floor to ceiling heights that ensure good amenity and adaptability.	Support.
Strategy 5.3: Develop controls that provide guidance on site amalgamation and isolation.	Support.
Strategy 5.4: Develop controls for fine grain frontages to ensure human scale development.	Support.
Strategy 5.5: Develop ground setback controls that provide attractive interfaces and functional streetscapes.	Support.
Strategy 5.6: Develop street wall controls that respond to character and human scale.	Support.
Direction 6: Elevate the importance of design quality in the City Centre.	
Strategy 6.1: Strengthen the commitment to design excellence.	Oppose. Controls we support in Directions 5 and 6 negate the need for onerous design review or competition.
Strategy 6.2: Encourage innovation and design quality in the local design and development industry.	Limited support. Existing sub-optimal outcomes are not a reflection on design talent available in Wollongong – it is a result of a death by a thousand cuts. Council needs to develop innovation and design quality attributes in its staff and processes (per Strategy 6.3).
Strategy 6.3: Provide clarity and improve outcomes through a strong assessment process.	Support.
Strategy 6.4: Prepare design guidelines that communicate better design outcomes.	Support.

Strategy 6.5: Develop specific design guidelines that demonstrate better built form outcomes on flood prone lands.	Support.
Direction 7: Strengthen the structure of the City through a permeable grid that prioritises pedestrians.	
Strategy 7.1: Define the role and function of streets in the City.	Support.
Strategy 7.2: Create a permeable city grid for pedestrians.	Support.
Strategy 7.3: Deliver active transport infrastructure.	Support.
Strategy 7.4: Enable the mode shift from cars to public transport.	Limited support – distinguish between residents and visitors when disincentivising parking. Ensure parking reductions are supported by concurrent public/active transport infrastructure improvements.
Strategy 7.5: Identify roads for vehicular traffic and servicing.	Support.
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 planting.	Support.
Strategy 8.2: Define and implement a 35% minimum canopy target on key walking streets by 2037.	Support.
Strategy 8.3: Prepare a City Centre Street Tree Masterplan.	Support.
Strategy 8.4: Establish a tree-centric approach to deliver greening in response to existing constraints.	Support.
Strategy 8.5: Leverage new development to offset the cost of greening.	Limited support – more detail needed on the process for attributing impact.
Strategy 8.6: Identify and prioritise public domain projects to catalyse renewal and encourage investment in the city.	Support.
Direction 9: Protect sunlight to key public spaces.	
Strategy 9.1: Protect solar access to key public spaces to maximise amenity.	Support.

EXCELLENT INDUSTRY CONSULTATION

We would like to start by thanking Wollongong City Council for your excellent engagement with the development industry during the preparation of the Framework. In particular, Chris Stewart, Bridget Jarvis and David Green deserve acknowledgement for their efforts.

We provide this submission as constructive input from industry practitioners that we hope will ensure that the Wollongong City Centre continues to thrive as an excellent place to invest, build, work, shop and live.

Our feedback is structured in response to the Framework's nine Directions:

1. Prioritise jobs growth and establish a resilient commercial core.
2. Define a thriving retail network that responds to character and supports a range of offers.
3. Plan for a variety of housing to support a lively and inclusive City.
4. Grow a legible city that supports a distinctive and evolving character.
5. Strengthen and simplify planning controls to promote built form diversity in response to people and place.
6. Elevate the importance of design quality in the City Centre.
7. Strengthen the structure of the City through a permeable grid that prioritises pedestrians.
8. Create a green network of open spaces for a sustainable, healthy and attractive city.
9. Protect sunlight to key public spaces.

DIRECTION 1: PRIORITISE JOBS GROWTH AND ESTABLISH A RESILIENT COMMERCIAL CORE

UDIA is a strong supporter of Wollongong City Council's *Economic Development Strategy* and acknowledges the excellent work that Mark Grimson and his team have done in attracting commercial investment to Wollongong. We believe that Wollongong City Centre can only thrive if residential, commercial and retail uses are all contributing to city activity – a 'living city'.

It is true that there has been a residential boom in the Wollongong City Centre over the last 5-10 years. It is important to acknowledge that this boom came off a low base of city-centre residential supply. It is clear to anyone visiting Wollongong that the city is not being overwhelmed by apartment developments – rather a historical imbalance in city centre uses is being corrected. The new apartment towers are making a positive contribution to both the activation of the city at all hours of the day, and the modernity of the city skyline. Commercial uses are still the dominant use by total floorspace.

UDIA believes that introducing the commercial-only precincts proposed in the Framework would be detrimental to the future of the city. While we support incentivising commercial development, we do not support commercial-only precincts where residential development is prohibited or artificially restricted. In other cities, these commercial-only precincts do not support city centre activation, and we believe Council should provide more evidence that they are the only solution to attracting commercial investors to the Wollongong City Centre.

The Framework has been prepared at the peak of apartment development in the city centre, and Council is at risk of making a knee-jerk reaction to a temporary imbalance in the types of new

development being proposed. We believe that longer term market fluctuations will mean commercial development will become more viable, especially with incentives, rather than zoning restrictions. As an example of these fluctuations, we are already seeing market adjustments in response to the lower residential demand forecasts resulting from COVID-19. Wollongong's existing zoning flexibility in the city centre is an asset that will allow market demand to determine a feasible mix of uses, that will include adequate commercial supply.

We also suggest that the modelling of future demand for residential and commercial floorspace was completed in June 2019 and should be revisited in light of the economic and demographic impacts from COVID-19. We note that SGS Economics and Planning has recently modelled lower growth scenarios in Sydney and the same may now apply to Wollongong.

We believe that the balance of emphasis in the Framework should shift from Strategy 1.1 (commercial-only zoning) to Strategy 1.2 (other incentives for commercial development). Strategy 1.2 should be expanded beyond exploring reduced parking requirements to also considering:

- Increased (above existing) FSR and HOB controls.
- Reduced or waived council fees and rates charges
- No basement parking – i.e. parking at ground level and above.
- Infrastructure charge concessions, such as a reduction in the s7.12 rate
- Prioritised Council assessment process.
- Greater planning flexibility for identified commercial developments.

These incentives can play a significant role in developer investment decisions without artificially restricting developers from meeting market demand. They are arguably more compelling for commercial developers than offering a commercial-only precinct.

RECOMMENDATION 1: COUNCIL SHOULD NOT INTRODUCE A COMMERCIAL-ONLY ZONE WHICH PROHIBITS RESIDENTIAL DEVELOPMENT, OR PLACE ADDITIONAL DEVELOPMENT CONTROL RESTRICTIONS ON RESIDENTIAL DEVELOPMENT, IN THE AREAS IT WANTS TO ENCOURAGE COMMERCIAL DEVELOPMENT.

RECOMMENDATION 2: COUNCIL SHOULD PROVIDE ADDITIONAL INCENTIVES FOR COMMERCIAL DEVELOPMENT (IN ADDITION TO THE EXISTING FLOOR SPACE RATIO INCENTIVES) IN THE AREAS IT WANTS TO ENCOURAGE COMMERCIAL DEVELOPMENT.

DIRECTION 2: DEFINE A THRIVING RETAIL NETWORK THAT RESPONDS TO CHARACTER AND SUPPORTS A RANGE OF OFFERS

UDIA is very pleased to see Council taking on board the feedback from the development industry that the blanket requirement across the city centre for ground floor retail uses has hurt the retail core and the city streetscape. We strongly support Strategy 2.2 and look forward to seeing a revitalisation of the city centre through ground floor residential activation.

RECOMMENDATION 3: COUNCIL SHOULD (AS PROPOSED) REMOVE THE GROUND FLOOR RETAIL REQUIREMENT OUTSIDE OF THE RETAIL CORE.

RECOMMENDATION 4: DIRECTION 3: PLAN FOR A VARIETY OF HOUSING TO SUPPORT A LIVELY AND INCLUSIVE CITY

Strategy 3.2 is to leverage opportunities for public benefit improvements through development. UDIA notes that Council already has a city-wide s7.12 plan in place that levies up to 2% of the value of a development. This Plan will deliver more than \$130 million in infrastructure upgrades in Wollongong. We believe that this Plan is appropriate, and Council should clarify in the Framework that it will not be imposing any additional developer charges or seeking and increase to s7.12 charges in the city. If this is the case, then Strategy 3.2 is redundant as the Plan is already in place. What should be emphasised is the importance of Council progressing the delivery of this infrastructure in a timely manner.

RECOMMENDATION 5: COUNCIL SHOULD NOT IMPOSE ADDITIONAL DEVELOPER CHARGES OR SEEK AN INCREASE IN S7.12 CHARGES TO FACILITATE PUBLIC DOMAIN IMPROVEMENTS.

UDIA believes that the Framework has not shown evidence that housing variety needs to be improved through additional planning intervention. There are existing provisions within the Apartment Design Guide (ADG) that seek a variety of apartment sizes. We believe these provisions are sufficient and we do not recommend additional requirements which would add to planning complexity. Our members' experience in other jurisdictions where additional apartment mix requirements have been imposed have been mixed and Council should stick with existing requirements in ADG. SEPP 70 will also help address housing mix.

RECOMMENDATION 6: COUNCIL SHOULD NOT IMPOSE ADDITIONAL REQUIREMENTS FOR HOUSING MIX OR APARTMENT SIZES.

Strategy 3.3 recommends Council prepare an Affordable Housing Contributions Scheme. UDIA notes that Council has already commenced this process with the imminent public exhibition of its Affordable Housing Options Paper. The ultimate aim of this process is to allow Council to impose an affordable housing contribution on developments.

While UDIA recognises the housing affordability crisis in Wollongong and the need for more affordable housing, we believe that imposing an affordable housing contribution on development without providing additional uplift is simply adding another tax to an already highly taxed industry.

The additional charge will make many developments unfeasible and they will simply not proceed. The additional charge will be passed on to homebuyers of market housing, making housing affordability even worse. It is vital that any affordable housing requirement is only imposed when there is sufficient additional uplift provided to ensure the ongoing feasibility of development.

RECOMMENDATION 7: COUNCIL SHOULD NOT IMPOSE ADDITIONAL REQUIREMENTS FOR AFFORDABLE RENTAL HOUSING OR STUDENT HOUSING WITHOUT PROVIDING ADEQUATE ADDITIONAL UPLIFT TO ENSURE DEVELOPMENT FEASIBILITY.

DIRECTION 4: GROW A LEGIBLE CITY THAT SUPPORTS A DISTINCTIVE AND EVOLVING CHARACTER

Several aspects of this direction would, if implemented, create uncertainty for the development industry regarding yield, and adversely affect the feasibility of development in the city centre. In Strategies 4.1 and 4.2, the Framework considers reducing floor space ratios (FSR) to address both 'place' and flood-prone land constraints. UDIA does not support any reductions in FSR to address 'place'. We believe height controls are the better determinant of scale and a sense of place in city centres.

Having said that, we do not support changes to the existing height controls for the reasons given in the Framework. Specifically, we do not support reducing height controls to:

- prevent increases in residential floorspace in flood-prone areas once the ground floor retail requirement is removed. A specific residential FSR control on these flood-prone sites (reflecting the current FSR control) is more appropriate because new developments on these sites may still proposed non-residential ground floor uses and should not be penalised on height.
- make the proposed commercial precinct the highest part of the skyline. While we oppose the commercial-only precinct idea itself, we also see no valid reason why a specific use should be favoured for the highest buildings in the city.
- protect continuous views from Flagstaff Hill to the escarpment. This is a very subjective and arbitrary viewline – there is no clear reason why some key city centre sites exceeding this viewline would be detrimental to the city. In fact, having some key sites higher than the escarpment would highlight the growth and importance of the city centre.
- align heights to so-called development potential around Wollongong Station. While it is true that some sites in this location have been difficult to renew, this history shouldn't influence decisions on height. High building masses near the station still have planning merit, and future site amalgamations may improve development potential.
- keep future development low in the Market Street commercial precinct, in line with older low-scale commercial development. This commercial precinct should be aspirational rather than answering to past development that reflected smaller scale commercial operations in Wollongong's history.

RECOMMENDATION 8: COUNCIL SHOULD RETAIN THE EXISTING HEIGHT CONTROLS IN THE CITY CENTRE.

RECOMMENDATION 9: COUNCIL SHOULD NOT REDUCE FLOOR SPACE RATIOS IN THE CITY CENTRE.

RECOMMENDATION 10: COUNCIL SHOULD NOT APPLY THE ARBITRARY PROTECTION OF VIEWS FROM FLAGSTAFF HILL TO THE ESCARPMENT, AND SHOULD ALLOW KEY SITES TO PIERCE THE VIEWLINE TO HIGHLIGHT THE IMPORTANCE OF THE CITY CENTRE.

DIRECTION 5: STRENGTHEN AND SIMPLIFY PLANNING CONTROLS TO PROMOTE BUILT FORM DIVERSITY IN RESPONSE TO PEOPLE AND PLACE

UDIA is generally supportive of all of the strategies identified under this direction. We have some concerns about the proposed reduction in residential gross floor area, without sufficient uplift to protect yield. However, the other proposed improvements to development controls will ensure a high level of design quality in the city centre. As noted in the next section, these additional controls (together with stronger Council processes and a dedicated City Centre team within Council) would lift design quality and negate the need for additional design-related red tape, such as additional design reviews or design excellence competitions.

DIRECTION 6: ELEVATE THE IMPORTANCE OF DESIGN QUALITY IN THE CITY CENTRE

UDIA opposes both the expansion of the Design Review Panel process, and the imposition of a design excellence competition on key sites.

A Design Review Panel has been in place in Wollongong for four years for development under SEPP 65, s7.18 of the Wollongong LEP, and boarding houses. Section 7.18 of the LEP sets out a rigorous process for assessing design excellence, without the need for a design excellence competition.

If design excellence has not been achieved in some cases following this process, UDIA suggests it is due to the inconsistent application of the process between different projects. Our members also suggest that inconsistent feedback is often received from the Design Review Panel between pre-DA discussions and final lodgement, and also inconsistent views are expressed between the Panel and Council assessment officers. It is important that Council strengthen the rigour of its existing process. With this in place, UDIA prefers this as the most efficient and effective way of lifting design quality.

Our members experience with design excellence competitions in other jurisdictions highlight several problems. Submitting a design is a significant cost imposition for the competing designers. The process often means a design is adopted (and paid for) that does not align with the developer's vision for the site. The process may also fragment the communication and working relationship between the developer, Council and the winning designer throughout the approval and construction process.

RECOMMENDATION 11: COUNCIL SHOULD STRENGTHEN ITS EXISTING DESIGN QUALITY PROCESSES AND STAFF EXPERTISE, AND NOT APPLY ADDITIONAL DESIGN REVIEW PROCESSES OR DESIGN EXCELLENCE COMPETITIONS.

Strategy 6.2 seeks to encourage innovation and design quality in the local design and development industry. UDIA would like to point out that there is already a large number of innovative and high-

quality designers and developers in Wollongong with inspiring visions for the Wollongong City Centre. It is important to note that a lot of amendments are imposed on building designs through the development assessment process, and that high quality original designs may suffer a 'death by a thousand cuts' in meeting the development controls and feedback from assessment officers and planning panels. For this reason, UDIA strongly supports Strategy 6.3 to form a dedicated City Centre team within council with a design focus.

DIRECTION 7: STRENGTHEN THE STRUCTURE OF THE CITY THROUGH A PERMEABLE GRID THAT PRIORITISES PEDESTRIANS

UDIA supports improvements to the permeability of the city centre for pedestrians. As more residents move into the city centre it becomes even more important to allow ease of access and legibility for pedestrians. UDIA notes that there is strong community sentiment against the full pedestrianisation of the Crown Street Mall, and recommends that the Framework consider the merits of a potential return of limited vehicle traffic to this strip.

We also recommend that Council ensure that any reductions in parking provision in the City Centre must:

- Distinguish between visitor and resident parking provision, ensuring residents have sufficient provision
- Only occur in tandem with public/active transport infrastructure upgrades.

DIRECTION 8: CREATE A GREEN NETWORK OF OPEN SPACES FOR A SUSTAINABLE, HEALTHY AND ATTRACTIVE CITY

UDIA agrees with Council's vision for increased street tree canopy and a network of open spaces. Again, as more residents and workers locate in the city centre, these open spaces become increasingly important for amenity and health. We would appreciate further clarification in the Framework about the proposal to make developers pay for the replacement of trees impacted by development and how the attribution of impact would be assessed.

DIRECTION 9: PROTECT SUNLIGHT TO KEY PUBLIC SPACES

UDIA agrees with this proposed direction and the expansion of solar access controls to the Crown Street Mall and the Arts Precinct.

ADDITIONAL CITY CENTRE ISSUES TO ADDRESS IN THE FRAMEWORK

While the focus of the Framework is to consolidate commercial and retail core activities within the immediate city centre, UDIA believes there are several key issues in adjacent parts of Wollongong that need to be addressed at the same time to ensure the ongoing success of the city centre.

CITY CENTRE GATEWAY STRATEGY

Access to the city centre from the west (Crown Street), north (Keira Street and Corrimal Street) and south (Keira Street and Corrimal Street) is via an uninspiring streetscape of mixed low density land uses such as car hire and car saleyards, petrol stations, low density residential, and playing fields.

While the Framework has sought to address the entry to the city from the Wollongong train station, UDIA believes it is important that these other access gateways by road are the subject of their own strategy (or incorporated into an expanded Framework) to ensure the ongoing attraction of investment in the city centre. Consider controls to phase out unwanted uses and support landmark developments on these gateways.

CONISTON-WOLLONGONG-NORTH WOLLONGONG CORRIDOR

Wollongong's proximity to Sydney means it has a large commuter community – over 20,000 Wollongong residents commute to Sydney each day for work. Many of these commuters travel by train departing Wollongong and (to a lesser extent) North Wollongong stations.

UDIA suggests that the Framework expand its purview to the corridor surrounding North Wollongong, Wollongong and Coniston train stations. All trains travelling to Sydney stop at these three stations and there is significant scope to develop not only high density homes for commuters within walking distance of the stations, but also new commercial and industrial uses to encourage commuting *from* Sydney for work.

OPTIMISATION OF PARKING LOTS

Council owns several off-street open-air parking lots within or adjacent to the city centre. These spaces represent an extremely underutilised asset that should be put to a higher use. UDIA recommends that Council explore options to deliver additional metered parking, affordable housing and market housing (or a combination of all of these) on these sites through s7.12 funding, planning agreements or redevelopment.

RECOMMENDATION 12: COUNCIL SHOULD ADDRESS THE FOLLOWING ADDITIONAL ISSUES IN THE FINAL FRAMEWORK: A CITY CENTRE GATEWAY STRATEGY; THE CONISTON-WOLLONGONG-NORTH WOLLONGONG COMMUTER CORRIDOR; AND A STRATEGY FOR OPTIMISING EXISTING COUNCIL CARPARKS IN THE CITY CENTRE.

CONCLUSION

UDIA's primary concerns with the Framework are:

- The proposed commercial-only precincts and the impact on development feasibility and renewal in these areas of the city centre.
- The proposed reductions in floor space ratio and/or height of buildings in various precincts of the city based on subjective 'place' criteria.
- The proposed leveraging of development to fund public domain improvements and affordable housing supply without additional uplift to support development feasibility.
- The proposed expansion of the Design Review Panel process, the expansion of key sites, and the application of a design excellence competition to these key sites, which will add unnecessary complexity, delay and expense to renewing the city centre.

We believe many of the issues affecting the city centre do not require wholesale change to the flexible planning controls currently in place, and that design quality and amenity can be lifted through strengthening council processes and providing certainty to the industry.

With the revisions recommended in this submission, UDIA believes the Framework will support the development of a thriving Wollongong City Centre.

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